

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (1\_3)**
- Recertification Assessment** (Choose an item.)
- Extension of Scope**

<p><b>Client Company name (Parent Company):</b>  <b>IOI Corporation Berhad</b></p>
<p>Client company Address:  IOI City Tower 2, Lebuhr IRC,  IOI Resort City  62502 Putrajaya, Malaysia</p>
<p>Certification Unit:  <b>Ladang Sabah Sdn Bhd-</b>  <b>Ladang Sabah Palm Oil Mill</b></p> <p>Location of Certification Unit:  Mile 45, Sandakan/ Telupid Road, WDT 164,  90009 Sandakan, Sabah, Malaysia</p>
<p>Date of Final Report:  14/7/2021</p>

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### Section 1: Scope of the Certification Assessment

1. Company Details			
<b>Parent Company</b>	IOI Corporation Berhad		
<b>RSPO Membership Number</b>	2-0002-04-000-00	<b>Membership Approval Date</b>	17/05/2004
<b>Address</b>	IOI City Tower 2, Lebuhr IRC, IOI Resort City, 62502 Putrajaya, Malaysia		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	Ladang Sabah Sdn Bhd- Ladang Sabah Palm Oil Mill		
<b>Location / Address</b>	Mile 45, Sandakan/ Telupid Road, WDT 164, 90009 Sandakan, Sabah, Malaysia		
<b>Website</b>	www.ioigroup.com		
<b>Management Representative</b>	Mr. William Siow (Sustainability Manager, Plantation Division, IOI HQ)	<b>E-mail</b>	<a href="mailto:william.siow@ioigroup.com">william.siow@ioigroup.com</a>
<b>Telephone</b>	+603-89478888 (Head Office)	<b>Facsimile</b>	+603-89432266 (Head Office)

2. Certification Information			
<b>Certificate Number</b>	RSPO 687135	<b>Date of First Certification</b>	03/04/2013
		<b>Certificate Start Date</b>	03/04/2018
		<b>Certificate Expiry Date</b>	02/04/2023
<b>Scope of Certification</b>	Palm Oil and Palm Kernel Production		
<b>Visit Objectives</b>	Continue RSPO audit another 70% from previous RSPO remote audit		
<b>Assessment Cycle</b>	<input type="checkbox"/> Initial Assessment <input type="checkbox"/> Recertification Assessment (Choose an item.) <input checked="" type="checkbox"/> Annual Surveillance Assessment (RA 1 ; ASA 3) <input type="checkbox"/> Scope Extension		
<b>Applicable Standards</b>	<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 <input type="checkbox"/> Group Certification 2016 <input type="checkbox"/> RSPO Independent Smallholders Standard 2019		
<b>Supply Chain Module</b>	<input checked="" type="checkbox"/> Identity Preserved <input type="checkbox"/> Mass Balance		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date

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EU-ISCC-Cert_ID218-20200088	ISCC EU	PT Intertek Utama Services	10/08/2021
MSPO 723824	MSPO 2530-3:2013 Part 3: General Principles for Oil Palm Plantations & Organised Smallholders	BSI Services Malaysia Sdn. Bhd.	19/06/2023
MSPO 723823	MSPO 2530-4:2013 Part 4: General Principles for Palm Oil Mills	BSI Services Malaysia Sdn. Bhd.	19/06/2023
MSPO 712340	MSPO Supply Chain Certification Standard	BSI Services Malaysia Sdn. Bhd.	29/05/2024

<b>4. Location(s) of Mill &amp; Supply Bases</b>			
<b>Name (Mill / Supply Base)</b>	<b>Location</b>	<b>GPS Coordinates</b>	
		<b>Latitude</b>	<b>Longitude</b>
Ladang Sabah Palm Oil Mill	Mile 45, Sandakan/Telupid Road, WDT 164, 90009, Sandakan, Sabah.	05° 43' 47.96" N	117° 34' 39.90" E
Bimbingan 1 Estate	Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah.	05° 37' 16.55" N	117° 26' 45.30" E
Bimbingan 2 Estate	Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah.	05° 37' 10.64" N	117° 25' 22.59" E
Labuk Estate	Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah.	05° 40' 13.35" N	117° 29' 55.92" E
Laukin Estate	Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah.	05° 46' 42.49" N	117° 31' 56.76" E
Luangmanis Estate	Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah.	05° 45' 47.98" N	117° 36' 22.94" E
Moynod Estate	Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah.	05° 44' 26.95" N	117° 36' 37.38" E
Terusan Baru Estate	Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah.	05° 48' 27.13" N	117° 31' 1.21" E
Sungai Sapi Estate	Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah.	05° 45' 53.37" N	117° 36' 37.15" E

<b>5. Description of Supply Base</b>					
<b>Estate</b>	<b>Total Planted (Mature + Immature) (ha)</b>	<b>HCV (ha)</b>	<b>Infrastructure &amp; Other (ha)</b>	<b>Total Area (ha)</b>	<b>% of Planted</b>
Bimbingan 1 Estate	1,716	0	221.39	1,937.39	88.57

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Bimbingan 2 Estate	1,727	0	228.61	1,955.61	88.31
Labuk Estate	2,320	70.71*	277.79	2,668.50	86.94
Moynod Estate	2,677	0	366.71	3,043.71	87.95
Luangmanis Estate	2,439	0	274.29	2,713.29	89.89
Terusan Baru Estate	2,226	60.95	216.58	2,503.53	88.91
Laukin Estate	1,893	0	235	2,128.00	88.96
Sungai Sapi Estate	1,204	33.72	61.58	1,299.30	92.67
<b>Total</b>	<b>16,202</b>	<b>165.38</b>	<b>1,881.95</b>	<b>18,249.33</b>	<b>88.78</b>

\* Changes in HCV in Labuk Estate was due to over declaration for previously unplanted area which was abandoned by government's oil & gas exploration activity in the year early 2000, currently being planted after resurvey

**6. Plantings & Cycle**

Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Bimbingan 1 Estate	753	225	-	738	-	963	753
Bimbingan 2 Estate	919	54	-	754	-	808	919
Labuk Estate	407	-	1,421	492	-	1,913	407
Moynod Estate	687	335	-	1,655	-	1,990	687
Luangmanis Estate	735	151	-	-	1,553	1,704	735
Terusan Baru Estate	507	960	156	-	603	1,719	507
Laukin Estate	428	145	-	1,303	17	1,465	428
Sungai Sapi Estate	354	-	-	735	115	850	354
<b>Total (ha)</b>	<b>4,790</b>	<b>1,870</b>	<b>1,577</b>	<b>5,677</b>	<b>2,288</b>	<b>11,412</b>	<b>4,790</b>

**7. Certified Tonnage of FFB (Own Certified Scope)**

Estate	Tonnage / year			
	Estimated (Apr 20-Mar 21)	Actual (Jan 20-Mar 21)		Forecast (Apr 21-Mar 22)
		Previous License (Jan 20-Mar 20)	Current License (Apr 20-Mar 21)	
Bimbingan 1 Estate	29,749	3,089.30	18,256.83	10,670
Bimbingan 2 Estate	17,086	4,800.15	20,076.26	9,291
Labuk Estate	56,683	10,626.26	55,453.14	54,895
Moynod Estate	50,115	9,837.57	48,754.11	47,549
Luangmanis Estate	37,504	8,857.30	40,251.02	38,163

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Terusan Baru Estate	37,651	8,890.24	41,235.88	42,666
Laukin Estate	30,308	6,915.73	32,850.17	28,416
Sungai Sapi Estate	25,599	4,341.90	24,927.39	18,464
<b>Total</b>	<b>284,695</b>	<b>57,358.45</b>	<b>281,804.80</b>	<b>250,114</b>

<b>8. Certified Tonnage of FFB (from other certified unit(s))</b>				
Estate	Tonnage / year			
	Estimated (Apr 20-Mar 21)	Actual (Jan 20-Mar 21)		Forecast (Apr 21-Mar 22)
Nil	N/A	Previous License (Jan 20-Mar 20)	Current License (Apr 20-Mar 21)	N/A
Linbar 1 Estate		1,428.43	1,636.95	
Linbar 2 Estate		485.26	389.85	
Sakilan Estate		1,253.65	-	
<b>Total</b>		5,194.14		

<b>9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)</b>				
Independent FFB Supplier	Tonnage / year			
	Estimated (Apr 20-Mar 21)	Actual (Jan 20-Mar 21)		Forecast (Apr 21-Mar 22)
N/A		Previous License (Jan 20-Mar 20)	Current License (Apr 20-Mar 21)	
Nil	n/a	n/a	n/a	n/a

<b>10. Certified Tonnage</b>				
Mill Capacity: 90 MT/hr	Estimated (Apr 20-Mar 21)	Actual (Jan 20-Mar 21)		Forecast (Mar 21-Feb 22 )
		Previous License (Jan 20-Mar 20)	Current License (Apr 20-Mar 21)	
	FFB	FFB		FFB
	<b>284,695.00</b>	60,525.79	<b>283,831.60</b>	250,114
	CPO (OER: 21.00%)	CPO (OER: 20.61%)		CPO (OER: 21.00%)
	<b>59,786.00</b>	12,457.10	<b>58,516.59</b>	52,524

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	<b>PK</b> <b>(KER: 5.50%)</b>	<b>PK</b> <b>(KER: 5.48%)</b>		<b>PK</b> <b>(KER: 5.5%)</b>
	<b>15,658.00</b>	3,297.87	<b>15,561.03</b>	13,919

<b>11. Actual Sold Volume (CPO)</b>					
<b>Current License period (Apr 20 – Mar 21)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	27,438.03	-	-	15,148.28	<b>42,586.31</b>
<b>Previous License period (Jan 20 – Mar 20)</b>					
CPO (MT)	12,468.91	-	-	-	12,365.46

<b>12. Actual Sold Volume (PK)</b>					
<b>Current License period (Apr 20 – Mar 21)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
PK (MT)	12,365.46	-		-	<b>12,365.46</b>
<b>Previous License period (Jan 20 – Mar 20)</b>					
PK (MT)	2,184.37	-		-	2,184.37

<b>13. Independent Smallholders Certification Claims</b>		
	Credit	Physical Volume (MT)
<b>IS-CSPO</b>	Nil	Nil
<b>IS-CSPKO</b>	Nil	Nil
<b>IS-CSPKE</b>	Nil	Nil



## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)  
Suite 29.01 Level 29, The Gardens North Tower,  
Mid Valley City, Lingkaran Syed Putra,  
59200 Kuala Lumpur, Malaysia.  
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639  
Representative: Nicholas Cheong ([Nicholas.Cheong@bsigroup.com](mailto:Nicholas.Cheong@bsigroup.com))  
Website: [www.bsigroup.com](http://www.bsigroup.com)

BSI is a leading global provider of management systems assessment and certification, with more than 84,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **25-27/3/2021**. The audit programme is included as Section 2.3. Due to the COVID-19 pandemic, this assessment involved a partial remote audit as allowed by RSPO Secretariat – RSPO P&C On-site & Remote Audits dated 24<sup>th</sup> March 2020. The remote audit was conducted on **16-17/2/2021**.

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 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. RSPO Principles & Criteria 2018 for the Production of Sustainable Palm Oil (MYNI 2019) was used to guide the assessment of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (and smallholders) of its supply base.

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula  $N = (0.8\sqrt{y}) \times (z)$  where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula  $(0.8\sqrt{y}) \times (z)$ ; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

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

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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 3.5.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment/annual surveillance assessment are detailed in Section 3.4.

This report is structured to provide a summary of assessment finding as attached in the Appendix A. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

For Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification 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**

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Recertification)</b>	<b>Year 2 (ASA 1_1)</b>	<b>Year 3 (ASA 1_2)</b>	<b>Year 4 (ASA 1_3)</b>	<b>Year 5 (ASA 1_4)</b>
Sakilan Palm Oil Mill	✓	✓	✓	✓	✓
Bimbingan 1 Estate	-	-	✓	-	✓
Bimbingan 2 Estate	-	-	✓	-	-
Labuk Estate	✓	-	✓	-	-
Moynod Estate	✓	-	-	✓	-
Luangmanis Estate	-	✓	-	✓	-
Terusan Baru Estate	-	✓	-	-	✓
Laukin Estate	-	✓	-	-	✓
Sungai Sapi Estate	✓	-	-	✓	-

**Tentative Date of Next Visit: December 27, 2021 - December 31, 2021**

**Total No. of Mandays: 15**

**2.2 BSI Assessment Team:**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Hafriazhar Mohd Mokhtar	Team Leader	He holds Bachelor Degree of Chemical Engineer. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He completed his endorsed RSPO P&C

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		Lead Assessor and SCCS standards training and has been involved in RSPO audits within Malaysia, Papua New Guinea and Solomon Islands. During this assessment, he assessed on the aspects of legal, social and stakeholder engagement. He is fluent in Bahasa Malaysia and English.
Muhamad Naquiuddin Mazeli	Team Member	He holds Bachelor of Science Horticulture at University Putra Malaysia. He has 11 years of working experience in oil palm plantation industry as sustainability team. Joining the sustainability team, he managed, implement and monitors the RSPO, ISCC, MSPO and ISO 9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training related to RSPO, MSPO and other certifications where applicable to the operations during previous company. He is a trained Safety and Health Officer and completed Food Safety System (FSSC and ISO 22000) for Mill and refineries, ISO 9001, ISO 45001 and HCV training with Proforest. During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, safety and health, environmental and workers and stakeholders consultation. He is fluent in Bahasa Malaysia and English.
Muhammad Fadzli Masran	Team Member	He holds Bachelor Degree in Forestry Science, graduated from University Putra Malaysia. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO 9001 and ISO 14001 at Kulim Plantations. He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018. During this assessment, he assessed on the aspects of mill and estate best practices, waste management, HCV and environmental. He is fluent in Bahasa Malaysia and English.

**Accompanying Persons:**

Name	Role
Nil	n/a

**2.3 Assessment Plan**

The Assessment plan was sent to the client prior to the assessment (attached assessment plan).

On-site:

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Thursday, 25/3/2021	0830 – 0900	Ladang Sabah POM: Opening Meeting: <ul style="list-style-type: none"> <li>Opening Presentation by Audit team leader.</li> <li>Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation).</li> </ul>	✓	✓	✓
	0900 – 1230	Moynod Estate: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, , etc.	✓	✓	✓
	1230 – 1330	Lunch	✓	✓	✓
	1330 – 1500	Moynod Estate: Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records.	✓	✓	✓
	1500 – 1515	Travel to Sungai Sapi Estate	✓	✓	✓
	1515 – 1715	Travel to Sungai Sapi Estate: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, , etc.	✓	✓	✓
	1715 – 1730	Day 1 interim closing	✓	✓	✓
Friday, 26/3/2021	0830 – 1230	Sungai Sapi Estate: Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records.	✓	✓	✓
	1030 – 1230	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	✓	-	-

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	1230 – 1400	Lunch and travel to Ladang Sabah POM	✓	✓	✓
	1400 – 1700	Ladang Sabah POM: Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, SEIA, HIRARC & GHG documents & records.	✓	✓	✓
	1700 – 1715	Day 2 interim closing	✓	✓	✓
Saturday, 27/3/2021	0830 – 1000	Ladang Sabah POM: 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.	✓	✓	✓
	1000 – 1230	Travel to Luangmanis Estate: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, , etc.	✓	✓	✓
	1230 – 1330	Lunch	✓	✓	✓
	1330 – 1600	Luangmanis Estate: Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records.	✓	✓	✓
	1600 – 1630	Auditors discussion & closing preparation	✓	✓	✓
	1630 – 1700	Closing meeting	✓	✓	✓

Remote:

Date	Time	Subjects	(VKP)	(HMM)
<b>Wednesday, 10/02/2021</b>	1030 - 1130	Proposed preparatory/test call between client and BSI auditor Communication on document preparation for remote/ICT audit	√	√
<b>Tuesday, 16/02/2021</b>  Luangmanis Estate	0900 - 0930	Opening Meeting: <ul style="list-style-type: none"> <li>Opening Presentation by Audit team leader.</li> <li>Confirmation of assessment scope and finalize Audit plan</li> </ul>	√	√
	0930 - 1230	Assessment and documentation review on: <ul style="list-style-type: none"> <li>Legal requirements, OHS and continual improvement, Good agriculture practice, environment and HCV.</li> </ul>	√	
		Assessment and documentation review on: <ul style="list-style-type: none"> <li>Social aspects, legal requirements, employees' welfare and stakeholder management</li> </ul>		√
Ladang Sabah POM	1230 - 1330	Lunch break	√	√
	1330 - 1630	Assessment and documentation review on: <ul style="list-style-type: none"> <li>RSPO SCCS components and RSPO Rules on Market Communication and Claim</li> <li>Legal requirements, OHS and continual improvement, Good agriculture practice, environment and HCV.</li> </ul>	√	
		Assessment and documentation review on: <ul style="list-style-type: none"> <li>Social aspects, legal requirements, employees' welfare and stakeholder management</li> <li>RSPO SCCS components and RSPO Rules on Market Communication and Claim</li> </ul>		√
	1630 - 1700	Interim closing for remote/ICT audit	√	√
<b>Wednesday, 17/02/2021</b>  Moynod Estate	09.00 - 1230	Assessment and documentation review on: <ul style="list-style-type: none"> <li>Legal requirements, OHS and continual improvement, Good agriculture practice, environment and HCV.</li> </ul>	√	
		Assessment and documentation review on: <ul style="list-style-type: none"> <li>Social aspects, legal requirements, employees' welfare and stakeholder management</li> </ul>		√
Sungai Sapi Estate	1230 - 1330	Lunch break	√	√
	1330 - 1600	Assessment and documentation review on: <ul style="list-style-type: none"> <li>Legal requirements, OHS and continual improvement, Good agriculture practice, environment and HCV.</li> </ul>	√	
		Assessment and documentation review on: <ul style="list-style-type: none"> <li>Social aspects, legal requirements, employees' welfare and stakeholder management</li> </ul>		√

Date	Time	Subjects	(VKP)	(HMM)
	1600 - 1630	Assessment team discussion and preparation of closing meeting	√	√
	1630 – 1700	Closing Meeting	√	√

### Section 3: Assessment Findings

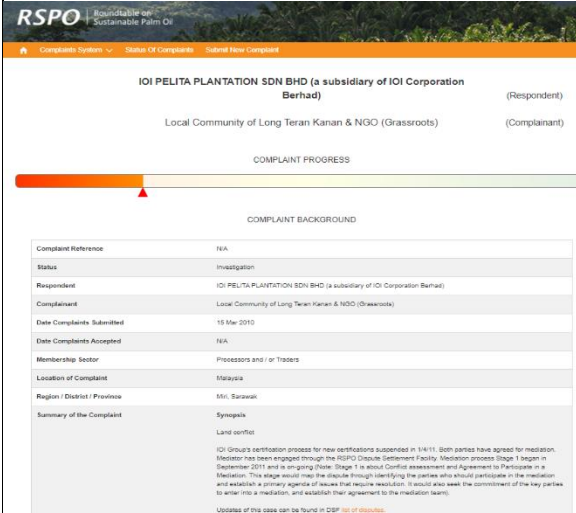
#### 3.1 Normative requirement applied for this assessment:

- IOI Corporation Berhad and supply base Multiple Management Units / Time Bound Plan
- RSPO Principle and Criteria (P&C) 2018 for the Production of Sustainable Palm Oil
- RSPO Group Certification Standard 2016
- Malaysia National Interpretation (2019) for RSPO P&C 2018
- Independent Smallholder Standard 2019

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

Requirement	Assessment	Compliance
Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?	Yes. Please refer to IOI Time Bound Plan updated as of 31 December 2020	Complied
Have all the estates and mills certified within five years after obtaining RSPO membership?	The certification was still in progress and target was on year 2023 as per time bound plan. Please refer to IOI Time Bound Plan updated as of 31 December 2020 and IOI ACOP 2019 under Time Bound Plan which was submitted to RSPO.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	No new acquisition	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?	Please refer to IOI Time Bound Plan updated as of 31 December 2020. This time bound plan was consistent with ACOP 2019. Due to the pandemic issue, certification preparation was affected such HGU process and as well as on ground preparation. Hence, the main assessment audit expected to be conducted in year 2021. 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 HGU process and as well as on ground	Complied

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	<p>preparation. Hence, the main assessment audit expected to be conducted in year 2021. The postponement of the main assessment into 2021 have been communicated to RSPO Head of Certification by email dated 2/9/2020. In November 2020, PT. SKS, PT. BNS and PT. BSS internal audit have been conducted.</p>	
<p>Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised</p>	<p>No isolated lapses. Please refer to IOI Time Bound Plan updated as of 31 December 2020</p>	<p>Complied</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised</p>	<p>No failure. Please refer to IOI Time Bound Plan updated as of 31 December 2020 and IOI ACOP 2019 which was submitted to RSPO.</p>	<p>Complied</p>
<p><b>Un-Certified Units or Holdings</b></p>		
<p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.3.</li> </ul>	<p>No replacement. The concession in Indonesia PT. KPAM had undergo the NPP process prior to any new planting dated 13 April 2020. This can refer at <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/page/3?">https://rspo.org/certification/new-planting-procedure/public-consultations/page/3?</a></p>	<p>Complied</p>
<p>Any new plantings since January 1<sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>No. The concession in Indonesia PT. KPAM had undergo the NPP process prior to any new planting. Please refer to the latest Time Bound Plan updated as of 31 December 2020.</p>	<p>Complied</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&amp;C criteria 2.2, 6.4, 7.5 and 7.6.</p>	<p>Settlement on the dispute over land ownership in Tinjar Long Lapok is still in progress through the engagement programme headed by the IOI stakeholder team. Please refer to our latest Time Bound Plan updated as of 31 December 2020</p> 	



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<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&amp;C criterion 6.3.</p>	<p>No labor dispute as per internal audit November 2020. Also there are some comment under ACOP 2019 as per below: 2. One of the key obstacles that could affect the operation of the plantation, especially on social issues include lack of awareness on the usage of fire in agricultural practices, land rights and access to suitable capacity building. In order to address these issues we have developed a platform for the community to participate or access to the training program, including enhancing the communication between the plantation and the adjacent Communities.</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&amp;C criteria 2.1</p>	<p>No non-compliance under legal being address during internal audit on November 2020. There also reporting under ACOP 2019. 1. Changes in local legal requirements related to plantation management. The plantation region in Malaysia, has subscribed to legal system that enable their sustainable team to get access to the latest relevant laws and regulations to support the management of their plantation. Meanwhile, in Indonesia, IOI is consistently conduct the effort to track if there is any changes of law and regulation.</p>	<p>Complied</p>
<p>Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.</p>	<p>Yes. The latest internal audit conducted was on November 2020 at P.T Sukses Karya Sawit, P.T Bumi Sawit Sejahtera and P.T Berkat Nabati Sejahtera. The team of sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance.</p>	<p>Complied</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Yes during audit been conducted accordingly. No negative comment been highlight by stakeholder. Refer 3.5 stakeholder comment.</p>	<p>Complied</p>

**3.3 Progress of scheme smallholders and/or outgrowers**

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
<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>Not applicable</p>	<p>Not applicable</p>

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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.		
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**3.4 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(Onsite) Critical (Major) Nonconformity and 2 (Onsite) 1 (remote) Minor Nonconformities and 1 (remote) OFI raised. The Ladang Sabah 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.

Due to the Movement Control Order (MCO) enforced by the government, the Critical (Major) Nonconformity close-out was conducted off-site through verification of documented information of CAP implemented. Final evidence received and Critical Nonconformity was closed on 16/6/2021.

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 it effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
<b>NCR Ref #</b>	2023865-202102-N1	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	Indicator 6.7.4 Minor
<b>Date Issued</b>	17/02/2021	<b>Due Date</b>	Next Assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	N/A
<b>Statement of Nonconformity:</b>	There is insufficient evidence of compliance on coverage of insurance provision in accordance with Malaysian law for 2 sample workers in Ladang Sabah POM and 2 sample workers in Moynod Estate.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	<p>The coverage of insurance provision in accordance with Malaysia law through SOCSO contribution was insufficiently evident for the workers as following :</p> <p><u>Ladang Sabah Palm Oil Mill:</u></p> <ul style="list-style-type: none"> <li>• Employee # 1SLS/IOI/0315/8987; Date joined 22/3/2015; for Month of March &amp; June 2020</li> <li>• Employee # 1SLS/IOI/0317/8997; Date joined 6/3/2017; for Month of March &amp; June 2020</li> </ul> <p><u>Moynod Estate:</u></p> <ul style="list-style-type: none"> <li>• Employee # 1SLS/IOI/1013/7544; Date joined 1/10/2013; for Month of March 2020</li> <li>• Employee # 1SLS/IOI/1115/7568; Date joined 1/11/2015; for Month of March 2020</li> </ul>		

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<b>Corrections:</b>	<ul style="list-style-type: none"> <li>To declare the late/lapses of contribution for the affected workers to SOCSO.</li> <li>To clear out all the late/lapses payment of the contribution as advice by SOCSO.</li> </ul>
<b>Root Cause Analysis:</b>	The lapses are due to the insufficient monitoring and verification of the SOCSO monthly payment process and its related data migration from the old check roll system to the new system.
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>To conduct monthly monitoring and verification on the SOCSO contribution to all workers.</li> <li>If there be any further lapses of contribution found, payment will be carried out in accordance to the procedure.</li> <li>Refresher training regarding the monitoring mechanism on SOCSO registration &amp; contribution for workers for personnel involved.</li> </ul>
<b>Assessment Conclusion:</b>	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.
<b>ASA 1_3 (On-site) Verification</b>	*This is Minor NC from partial remote audit conducted on 17/2/2021. Verification of CAP not conducted and a one-year period was given since the period of conducting on-site audit from the remote audit date was insufficient for full implementation of accepted CAP. Hence, Minor NC remain open.

Non-conformity			
<b>NCR Ref #</b>	2036144-202103-M1	<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 3.6.1 Critical
<b>Date Issued</b>	27/3/2021	<b>Due Date</b>	24/6/2021
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	16/6/2021
<b>Statement of Nonconformity:</b>	Implementation of mitigation plan for an identified H&S issues in estate operation was found not adequate.		
<b>Requirement Reference:</b>	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
<b>Objective Evidence:</b>	Moynod Estate: Sighted Sprayer workers in Moynod Estate was using general trailer (not passenger trailer) without safety precaution as per HIRARC recommendation (Reviewed dated 10/1/2021) from field to Office thus Major NC been raise during this Audit.		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>To conduct immediate action for the maintenance of the passenger trailer by replacing punctured tyres with good one.</li> <li>To issue reminder letter to the estate management for the delayed action on maintenance process of the passenger trailer.</li> <li>To issue reminder letter to the workers who had failed to follow instruction by the Assistant Manager.</li> <li>To issue reminder letter to the Field Supervisor in-charge for supervision failure.</li> </ol>		

	<ol style="list-style-type: none"> <li>5. To conduct briefing and re-training with evaluation of the training to workers on the safety aspect when using the general trailer as transportation means as per SOP and HIRARC requirement.</li> <li>6. To establish and to start conducting inspection on the condition of the passenger trailer as part of in the workplace inspection.</li> </ol>
<p><b>Root Cause Analysis:</b></p>	<p>As normally practiced, the passenger trailer is being used for workers' transportation on daily basis. However, the passenger trailer was in breakdown due to punctured tyres since end February 2021. There was no immediate and further follow action taken to repair the passenger trailer by the estate management. It is noted that there is no inspection and monitoring for passenger trailer as part of the workplace inspection.</p> <p>The Assistant Manager with the acknowledgement by the Estate Manager decided to use the general trailer as workers' transportation though they were aware with the SOP of <i>Pemanduan Traktor</i> and SOP <i>Pengangkutan Pekerja (Umum)</i> and HIRARC requirements. All workers were verbally briefed by the Assistant Manager on the needs to sit in the trailer floor as mentioned in the SOP requirement before the general trailer move. Regrettably, the verbal instructions were failed to be followed accordingly by workers.</p> <p>In addition, supervision by the Field Supervisor in-charge of the workers was lacking to ensure that they adhered to the SOP.</p>
<p><b>Corrective Actions:</b></p>	<ol style="list-style-type: none"> <li>1. To develop new HIRARC for workers' transportation using the general trailer in case of the passenger trailer breakdown.</li> <li>2. Workplace inspection on the use of general trailer and passenger trailer to be conducted by the field supervisor on daily basis to ensure compliance of SOP and HIRARC.</li> <li>3. To ensure vehicle inspection is conducted on daily basis. Any defects report is to be immediately communicated to the estate management for an immediate action. Inspection is to be conducted by the workshop operator, field supervisor and Assistant Manager.</li> <li>4. To regularly announce during muster on the needs to observe SOP &amp; HIRARC requirements when using the general trailer and passenger trailer as transportation means.</li> <li>5. HSE Department is to conduct an internal audit and regular inspection to ensure all mitigation measures are implemented and complied.</li> </ol>
<p><b>Assessment Conclusion:</b></p>	<p>Evidence of corrections and corrective actions verified:</p> <ul style="list-style-type: none"> <li>- Punctured tyres replacement and relevant purchases record; Date: 5/6/2021</li> <li>- Reminder letters for the relevant personnel; Date: 14/4/2021</li> <li>- Refresher training on SOP &amp; training evaluation record; Date: 15/4/2021</li> <li>- Vehicle inspection in particular the trailer; Date: March, April, May &amp; June 2021</li> <li>- Briefing record on safety procedures for workers' transportation; Date: 26/3/2021, 8/4/2021, 18/5/2021 &amp; 2/6/2021</li> <li>- Workplace inspection record; Date: March, April, May &amp; June 2021</li> <li>- Internal audit conducted by HSE Department; Date: 8/6/2021</li> <li>- HIRARC Form for Transporting of Workers Using General Trailer; Date: 5/4/2021</li> </ul> <p>Evidence of corrections and corrective actions taken confirmed the CAP proposed were effective to address the issue. Hence, Critical NC was closed on 16/6/2021.</p>

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Non-conformity			
<b>NCR Ref #</b>	2036144-202103-N1	<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 7.11.3 Minor
<b>Date Issued</b>	27/3/2021	<b>Due Date</b>	Next assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	N/A
<b>Statement of Nonconformity:</b>	No evidence of the operating units' engagement on fire prevention and control measures with the adjacent stakeholders		
<b>Requirement Reference:</b>	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.		
<b>Objective Evidence:</b>	<p>Moynod Estate &amp; Sg. Sapi Estate:</p> <p>The estates visited engagement with the adjacent stakeholders during stakeholders' consultation meeting.</p> <p>In the meeting, the estate brief the stakeholders on the IOI group policies, environmental and social issue.</p> <p>However, there is no evidence of the operating units' engagement on fire prevention and control measures with the adjacent stakeholders.</p>		
<b>Corrections:</b>	The commitment from the new guidelines will be extracted and conversed to the adjacent stakeholders via other method of communication such as digital communication.		
<b>Root Cause Analysis:</b>	The engagement on fire prevention and control measures with adjacent stakeholders is usually conducted once a year during the external stakeholder consultation and inclusive of inputs communication given following the Emergency Response Plan measure in which the new commitment as mentioned in the new guideline dated Jan 8th has yet being incorporated. Adding in, the guideline had just been newly distributed towards end February 2021 by IOI Sustainability HQ.		
<b>Corrective Actions:</b>	Apart of having the communication digitally conversed, the commitment from the new guidelines will also be communicated during the annual stakeholder consultation and as when the needs arise.		
<b>Assessment Conclusion:</b>	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.		

Non-conformity			
<b>NCR Ref #</b>	2036144-202103-N2	<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 4.2.3 Minor
<b>Date Issued</b>	27/3/2021	<b>Due Date</b>	Next assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	N/A

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<b>Statement of Nonconformity:</b>	The unit of certification insufficiently keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is inadequately available and communicated to relevant stakeholders.
<b>Requirement Reference:</b>	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.
<b>Objective Evidence:</b>	<p>Sg. Sapi Estate:</p> <p>During visit to Sg. Sapi and consultation with external stakeholders from school, the representative was asking on the status of the feedback given to the estate. Based on records of communication (Borang Maklumbalas; Lampiran 4) with information of grievances and complaints received from the school representative dated 28/1/2021 and records of time bound action plan for identified social aspects related to the feedbacks, it was found that there's insufficient evidence that the grievance parties been informed of the grievance progress including against agreed timeframe and the outcome is not made available and communicated to the relevant stakeholders.</p> <p>Furthermore, some previous letters of requests received from external stakeholder and estate's response to the requests made was unable to be determined either the requester has received and/or acknowledge the response or not.</p>
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- The estate management to immediately attend to response on the school request by informing the current status of the school's request to them through the finalized TBAP.</li> <li>- The estate management will arrange to get the written acknowledgement receipt from the stakeholders.</li> </ul>
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>- The request and response from the schools and other stakeholders during stakeholder consultation is recorded through a finalized Time Bound Action Plan (TBAP) document in which this record will be shared to the respective stakeholders after each consultation session ended however it is regretful that the TBAP document had just been finalized towards the audit day which cause the estate management to have missed to communicate on their stakeholder's current status request according to timeline.</li> <li>- The response from the estate was only being noted through verbal telephonic call and no written records to support the receipt.</li> </ul>
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- To include the stakeholder grievance mechanism in the annual stakeholder consultation programme. The request and Time Bound Action Plan record are to be communicated and acknowledged by stakeholders within the established and agreed time frame discussed during the consultation conducted.</li> <li>- The estate management is to regularly conduct monitoring towards stakeholders' grievances, issues, and request using the grievances log/register mechanism.</li> </ul>
<b>Assessment Conclusion:</b>	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	Finding Reference: 2023865-202102-I1 Clause: 6.2.6 The Gross Living Wage Calculation (GLWC) could be further specified for estates in Sabah
ASA 1_3 (On-site) Verification	*This is OFI from partial remote audit conducted on 17/2/2021. Verification of improvement not conducted and a one-year period was given since the period of conducting on-site audit from the remote audit date was insufficient for full implementation of improvement process. Hence, OFI remain open.

Opportunity for Improvements	
OFI #	Description
Nil	N/A

Positive Findings	
PF #	Description
PF 1	Good document retrieval from the operating unit.
PF 2	Good commitment from estate management and IOI Sustainability team.

### 3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1864944-202001-M1	Clause & Category (Critical (Major) / Minor)	Indicator 2.1.1 Critical (Major)
Closed (Yes / No)	Yes	Date of nonconformity Closure	15/04/2020
Statement of Nonconformity:	The unit certification does not complies with application legal requirement, in terms of work permit and statutory contribution to government agencies.		
Requirement Reference:	The unit of certification complies with applicable legal requirements.		
Objective Evidence:	BB1 Estate Menara Jernih – 2 out of 4 FFB transporter service provider’s workers found as : <ul style="list-style-type: none"> <li>• Driver name: Darwis, Passport No.: AS364501 work permit with IOI Plantation expired on 29.11.2017. According to the service provider, the work permit is in progress of renewal; however, no work permit sighted available as at time of audit. The evidence presented on the permit and passport application submitted on Feb 2019 but no further result / action available right after the submission.</li> <li>• No EPF, SIP and SOCSO contribution made by both party for local worker – Driver Name: Mohd Nor Aidil (ID: 990119126045) AK Contractor – 2 out of 4 FFB transporter service provider’s workers found without valid work permit.</li> </ul>		



	<p>Passport No.: B4804756 – no work permit available as at time of audit, Passport No.: AT972078 carries Social Visit Pass instead of work permit.</p> <p>Labuk Estate</p> <p>1 of the sampled migrant worker (Passport No.: AT816179) found with expired work permit since 30.08.2019. The original passport is currently taken by the appointed agency and have not submitted to the immigration office for renewal.</p>
<p><b>Corrective Actions:</b></p>	<p>BB1 Estate</p> <ol style="list-style-type: none"> <li>1. A meeting to remind all contractors will be carried out to reiterate company’s commitment.</li> <li>2. Due diligence process prior contractor engagement will be conducted.</li> <li>3. Supplementary internal audit on the contractor engagement will be carried out and result of findings will be made transparent.</li> </ol> <p>Labuk Estate</p> <p>The Operating Unit and HR Department is committed in continuous improvements on the practices and mechanism to monitor worker’s data. A centralized monitoring is currently in place with data update from respective estate submitted on monthly basis. Through this practice, the tracking mechanism record at the estate level on the passport and work permit shall sync with each other. Undoubtedly, the knowledge gaps requires constant trainings on the part of the person in charge after which stringent action on PIC will be taken should there be deliberate act of delaying submissions.</p>
<p><b>Assessment Conclusion:</b></p>	<p>Evidence submitted:</p> <p>BB1:</p> <ol style="list-style-type: none"> <li>1. Letter of suspension of service to the FFB transport contractors dated 25/2/2020</li> <li>2. SOCSO’s Acknowledgement Contribution Received (ACR) and Employee Contribution Received (ECR) for all contractors that show both employers and employees have made the SOCSO and SIP contributions</li> <li>3. Borang A KWSP 6 to show that the contributions from both employers and employees have been made accordingly for all contractors</li> <li>4. Minutes of meeting dated 22/2/2020 that show all the contractors had been reminded about the company’s commitment in complying with the legal requirements</li> <li>5. Guideline for Tenant &amp; Service Provider Management &amp; Monitoring Record [SPO/SDK/G/01, dated 1/2/2020] – Clause 3 has mentioned that due diligence shall be conducted prior to engagement of tenants and service providers</li> <li>6. Supplementary internal audit report dated 9/3/2020 and 2/4/2020 to cover the engagement of contractors</li> </ol> <p>Labuk Estate:</p> <ol style="list-style-type: none"> <li>1. Training material and training attendance dated 3/4/2020 to show that training on the tracking mechanism / monitoring system for passport and work permit renewal had been given to the relevant personnel</li> </ol> <p>The evidence of the corrective actions was found to be adequate to close the NCR.</p>
<p><b>ASA 1_3 Verification</b></p>	<p>All relevant and applicable legal requirements had been identified by Ladang Sabah POM and its supply base. It incorporated the latest amendments, that is, OSH (Noise Exposure) Regulations 2019, Minimum Wages Order 2020 and Prevention and Control of Infectious Diseases (Compounding of Offences)</p>



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	<p>(Amendment) (No.6) Regulations 2020. At the assessed operating units, the following were noted to be complied.</p> <p>Ladang Sabah POM</p> <ol style="list-style-type: none"> <li>1. MPOB License; License Number: 500264104000; License Expiry Date: 30/06/2021.</li> <li>2. DOE License; License Number: 003445; License Expiry Date: 30/06/2021.</li> <li>3. DOE License [Lesen Pelanggaran (Udara Bersih) 2014]; License Number: 005200; License Expiry Date: 30/08/2021.</li> <li>4. JTK Salary Deduction Permit; Permit Number: 600-1/2/8/320 (11/SDK/2020-0272); License Expiry Date: 12/04/2022.</li> <li>5. JTK Salary Advance Permit; Permit Number: 600-1/2/8/320 (06/SDK/2019-0153); License Expiry Date: 23/04/2021.</li> <li>6. JTK License to Employ Non-Residential Workers; License Number: JTK.H.SDK.600-4/1/01261/003867; License Expiry Date: 16/09/2021.</li> <li>7. Competent person for scheduled waste (CePSWaM/00311) Mr Jimi Bin Dalinting</li> </ol> <p>Luangmanis Estate</p> <ol style="list-style-type: none"> <li>1. Air Compressor License; License Number: PMT-SB/20 33970; License Valid till: 19/10/2021.</li> <li>2. Energy Commission License (Private Installation); License Number: 2020/02841; Serial Number: 47163; License Validity Period: 01/01/2021 – 31/12/2021</li> <li>3. MPOB License; License Number: 501728102000; License Period: 01/05/2020 till 30/04/2021</li> <li>4. Diesel License; License Reference Number: PPDNKK.SDK.18/2002 (SK); Serial Number: P(Q2001); Storage Capacity: 18,400 Litre; License Validity: 03/01/2021 – 02/01/2024.</li> </ol> <p>Moynod Estate</p> <ol style="list-style-type: none"> <li>1. Energy Commission License (Private Installation); License Number: 2020/01405; Serial Number: 44079; License Validity Period: 24/06/2020 – 23/06/2021.</li> <li>2. MPOB License: License Number: 501728102000; License Period: 01/05/2020 till 30/04/2021</li> <li>3. MPOB License (Nursery); License Number: 61637601100; License Validity Period: 01/04/2020 – 31/03/2021</li> <li>4. Air Compressor License; License Number: PMT-SB/20 38025; License Valid till 29/03/2022</li> </ol> <p>Sungai Sapi Estate</p>
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	<p>1. Air Compressor License; License Number: PMT-SB/21 38153; License Valid till 03/04/2022</p> <p>2. MPOB License: License Number: 501728102000; License Period: 01/05/2020 till 30/04/2021</p> <p>3. Diesel License; License Reference Number: PPDNKK.SDK.20/2002 (SK); P Series Number: S002393; Storage Capacity: 18,200 Litre; License Validity: 03/03/2020 – 02/03/2021.</p> <p>No recurrence of issue, hence Major NC remain closed.</p>
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Non-conformity			
<b>NCR Ref #</b>	1864944-202001-M2	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	Indicator 6.2.2 Critical (Major)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	15/04/2020
<b>Statement of Nonconformity:</b>	<p>1. Undocumented record for work done by family members and service provider’s workers.</p> <p>2. Documents related to payment and condition of employment for randomly selected service provider’s workers not available for review.</p> <p>3. Inaccurate information on compensation for work performed.</p>		
<b>Requirement Reference:</b>	Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.		
<b>Objective Evidence:</b>	<p>BB2 Estate</p> <p>1. mothers of 4 randomly selected child from crèche were found not documented in the employee list and BB2 payroll. Interview with the selected child and crèche’s nanny, children are sent to crèche while both parents are working in the estates. Review of “Worker Census’ records sighted, 3 out of the 4 mothers are classified as ‘dependent’ while 1 out of 4 mother is classified as manurer / manure spreader.</p> <p>2. There are 2 FFB transport service provider used by the estate management. However, none of the selected workers of the service provider employment contracts and related documents detailing payment and conditions of employment and payroll documents available for review as at time of audit. Noted, list provided incomplete; whereby 2 drivers name derived from the weight bridge ticker were not found in the list provided.</p> <p>3. 1 of the sampled worker (Emp. No.: 1370) was found not paid according to the work carried out as harvester. Inconsistency found in report tracking between workers ‘payslip’, ‘Harvester Tonnage For Month xx/2019 report’ and ‘Penyata Gaji Penuaian / Detail of Work salary summary.’ E.g.:</p> <ul style="list-style-type: none"> <li>• July 2019 – Harvester Tonnage Report generated found total of 42.21 MT but payslip &amp; detailed salary summary and salary paid based on 46.96 MT.</li> </ul>		

	<ul style="list-style-type: none"> <li>January 2019 – Harvester Tonnage Report generated found total of 53.04 MT but payslip &amp; detailed salary summary and salary paid based on 48.31 MT.</li> </ul> <p>BB1 Estate</p> <p>1 of the sampled worker (Emp: 3871) for the month of January 2019, found not being paid according to the overtime hours worked. Payslip reviewed found with 50 overtime hours but PINFOSYS (Checkroll Daily Record) and Overtime Requisition Form for the Month of January 2019 found as 52 hours.</p>
<p><b>Corrective Actions:</b></p>	<p>BB2 Estate</p> <ol style="list-style-type: none"> <li>Supplementary internal audit on workers registry and contractors' engagement will be carried out and result of findings will be made transparent.</li> <li>A meeting to remind all contractors will be carried out to reiterate company's commitment.</li> <li>Due diligence process prior contractor engagement will be conducted.</li> <li>A copy of the payslip with details of work for each harvester shall be kept for reference ease at estate upon final database generated on monthly basis after the month end closing.</li> </ol> <p>BB1 Estate</p> <ol style="list-style-type: none"> <li>A supplementary internal audit to be carried out on the estate overtime payment to ensure overtime are paid correctly and result of findings will be made transparent.</li> <li>Moving forward, by 1<sup>st</sup> March 2020, IOI has committed on transparency and improving the operational system in centralized data monitoring with the introduction of SAP system (Systems Application and Products in Data Processing) at the group level. This system introduced standardization on information and data management including accounting, payment rate, leave entitlement, operations, etc. The implementation of the new system will ensure only the authorized/ approved data will be keyed in into the system thus able to avoid the multiple layer of data transfer and therefore reduce the risk of error in the data entry.</li> </ol>
<p><b>Assessment Conclusion:</b></p>	<p>Evidence submitted:</p> <p>BB2:</p> <ol style="list-style-type: none"> <li>Estate Master Data Employee Register that show the 2 concerned persons have been registered to be legalized and recruited for employment.</li> <li>List of persons which include the 2 samples submitted to IOI HR department on 7/4/2020 for legalization process.</li> <li>Letter of suspension of service to the FFB transport contractors dated 17/2/2020.</li> <li>Pay slips generated from the correct months database that show the total FFB mt is tally with Harvester Tonnage Report.</li> <li>Supplementary internal audit report dated 13/3 &amp; 2/4/2020 to cover the workers registry and contractors' engagement.</li> <li>Minutes of meeting dated 22/2/2020 that show all the contractors had been reminded about the company's commitment in complying with the legal requirements.</li> <li>Guideline for Tenant &amp; Service Provider Management &amp; Monitoring Record [SPO/SDK/G/01, dated 1/2/2020] – Clause 3 has mentioned that due diligence shall be conducted prior to engagement of tenants and service providers.</li> </ol>

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	<p>BB1:</p> <ol style="list-style-type: none"> <li>1. Warning letter to the concerned staff dated 12/2/2020.</li> <li>2. Pay slip for January 2020 that shows the underpayment has been reimbursed.</li> <li>3. Supplementary internal audit.</li> </ol> <p>The evidence of the corrective actions was found to be adequate to close the NCR.</p>
<p><b>ASA 1_3 Verification</b></p>	<p>Employment contracts detailing payments and conditions of employment available to the workers for sample employees sighted as per indicator 6.1.6 above. Regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with Sabah Labour Ordinance and Minimum Wages Order.</p> <p>Other samples also sighted for following workers:</p> <p>Mill:</p> <ol style="list-style-type: none"> <li>1) Abdul Hadi Bin Rasmo</li> <li>2) Andi Juli</li> <li>3) Archdeboney Tsau</li> <li>4) Ardy Bin Johari</li> <li>5) Asimah Binti Babba</li> <li>6) Zuladlan Bin Saharan</li> <li>7) Vidaylin Binti Asmit</li> </ol> <p>Luangmanis Estate:</p> <ol style="list-style-type: none"> <li>1) Darno Bin Daru; Cutter; M</li> <li>2) Dewa Bin Hamadia; Cutter; M</li> <li>3) Ernie; Manurer; F</li> <li>4) Hana; Sprayer; F</li> <li>5) Indo Tang Binti Sire; Chreche Ayah; F</li> <li>6) Neni Binti Messi; Sprayer; F</li> <li>7) Saffar Layar; Driver; M</li> <li>8) Samsul Bin Kude; General Maintenance; M</li> <li>9) Jusma Binti Habang; Carrier; F</li> </ol> <p>Moynod Estate:</p> <ol style="list-style-type: none"> <li>1) Ansar; Harvester; M</li> <li>2) Bunga Tan Binti Ambo Sakka; Sprayer; F</li> <li>3) Elisabeth Agnes Masrinus; Manurer; F</li> <li>4) Hamidi Herman; Harvester; M</li> <li>5) Jaswandi Wawan; EFB Mulching; M</li> <li>6) Mira Daodah; Manurer; F</li> <li>7) Siti Asiah Abdullah; Field Worker; F</li> <li>8) Suherman Samsu; Field Worker; M</li> <li>9) Suzila Binti Irfan; Sprayer; F</li> </ol> <p>Sg. Sapi Estate:</p> <ol style="list-style-type: none"> <li>1) Aco; Sprayer; M</li> <li>2) Andis Bin Tarima; Harvester; M</li> <li>3) Damayanti Dahlan; General Worker; F</li> <li>4) Hamsina Binti Mapiare; General Worker; F</li> <li>5) Ismail Bin Yusuf; Harvester; M</li> <li>6) Marna Binti Dise; General Worker; F</li> </ol>

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	<p>7) Mohd Sofian Bin Salleh; Driver; M 8) Pato Dg Tata; Harvester; M 9) Sainab Andi Hamsa; Manurer; F</p> <p>No recurrence of issue, hence Major NC remain closed.</p>
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Non-conformity			
<b>NCR Ref #</b>	1864944-202001-M3	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	Indicator 6.2.3 Critical (Major)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	15/04/2020
<b>Statement of Nonconformity:</b>	There is evidence of non-legal compliance in regards in workers' wages.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	<p>BB1 Estate</p> <p>01 of sampled worker (Emp. No. 3350) for the month of December 2019, found not being paid at minimum wage MYR1,100 despite having full attendance – 24 days as offered (excluding 2 days Public Holiday). Further documentation review sighted inconsistency of documented evidences as below.</p> <ul style="list-style-type: none"> <li>• The initial employment contract dated 01.07.2016 under clause 2 – states that if the employer is unable to provide the minimum piece wage job, the employee will be given a daily wage of MYR35.40 (subsequently MYR42.31 as the minimum wage of pay has increased since 2019).</li> <li>• MW1 (Attendance and daily task monitoring record of employees) &amp; PINFOSYS (Checkroll Daily Records) for the month of December 2019 on selected worker found with full attendance – 24 days of work per month;</li> <li>• The MW1 records shows that daily worked hours found 6 to 7 hours a day. No justification provided on the shall falls of completing the ordinary hours of work. Sighted as well there are 29 approx.. 5 workers (in the same group) having the same work hours from 6 to 7 hours.</li> <li>• MW2 – Borang Ulasan Pencapaian Produktiviti Pekerja month of December 2019 sighted 14 days of work assigned does not achieve the targeted volume. However, the MW2 is only applicable to Emp. No.: 3350.</li> <li>• Payslip of the said worker was found having full attendance 24 days of work with total wage paid at MYR745.20; whereby 14 days is calculated as day wage while rest of the day is paid according to piece rated .</li> <li>• Type of work assigned in MW2 and PINFOSYS is not consistent. 14 days of Slashing, 9 days of Manuring, 1 day of Manuring Compound as stated in MW2 while PINFOSYS states 11 days of manuring, 3 day of cover crop weeding, 1 day front stacking, 9 days of slashing. Although the field staff has commented that the worker did not achieve the target, it is not verifiable as what type of work that is not achieved since both documents are not consistent.</li> <li>• Payslip indicated that total of Slashing work is 1.74 Hectare paid; but in MW2 there are total of 14.29 hectare work of slashing completed. Detail of pay and calculation not clear and verifiable.</li> </ul> <p>BB2 Estate</p>		

	<p>(4) 1 of the sampled worker (Emp. : 2671 / AP) is not paid with overtime premium for overtime hours worked. He is paid with monthly wage of MYR1,190 although found worked more than 8 hours per day as reported in the Buku Laporan AP. e.g. Dec 2019 – 4<sup>th</sup> (0710~1920), 5<sup>th</sup> (0647~1830), 6<sup>th</sup> (0640~1750), 9<sup>th</sup> (0657~1700), 10<sup>th</sup> (0510~1720), etc.</p>
<p><b>Corrective Actions:</b></p>	<p>BB1 Estate</p> <ol style="list-style-type: none"> <li>1. Moving forward, by 1<sup>st</sup> March 2020, IOI has committed be more transparent and improving the operational system in centralized data monitoring with the introduction of SAP system (Systems Application and Products in Data Processing) at the group level. This system introduced standardization on information and data management including accounting, payment rate, leave entitlement, operations, etc. and the data entry is required for work details (e.g working hours, work productivity, leave etc). Work done are to be entered on a daily basis thus reducing the risk of the record not being updated. These record will then be reflected on the worker’s salary daily and enabled daily justification for their salary payment.</li> <li>2. Supplementary internal audit to be carried out on the consistency of recording with payment at estate operation and result of findings will be made transparent.</li> </ol> <p>BB2 Estate</p> <ol style="list-style-type: none"> <li>1. A briefing to understand working hours, overtime, how is the procedure of overtime, terms of voluntary nature of overtime will be conducted to all worker at the estate level.</li> <li>2. A supplementary internal audit to be carried out on the estate overtime payment to ensure overtime are paid correctly and result of findings will be made transparent.</li> </ol>
<p><b>Assessment Conclusion:</b></p>	<p>Evidence submitted:</p> <p>BB1</p> <ol style="list-style-type: none"> <li>1. Warning letter to the concerned staff dated 18/2/2020</li> <li>2. Interview report done by the Sustainable Palm Oil Dept. dated 2/4/2020 to show that investigation on workers has been made</li> <li>3. Training materials and training records dated 3/2 and 2/4/2020 that show the training and guidance had been given to ensure good management and supervision of the workers daily task</li> <li>4. Supplementary internal audit report dated 9/3/2020 and 2/4/2020 to cover the consistency of recording with payment at estate operation</li> </ol> <p>BB2</p> <ol style="list-style-type: none"> <li>1. Pictures that show working hours have been displayed to create awareness to the workers on their working hours and able to explain it to others</li> <li>2. Briefing attendance records dated 3/2 &amp; 15/2/2020 on working hours, overtime, how is the procedure of overtime, terms of voluntary nature of overtime</li> <li>3. Supplementary internal audit report dated 13/3 &amp; 2/4/2020 to cover the overtime payment to ensure overtime are paid correctly</li> </ol> <p>The evidence of the corrective actions was found to be adequate to close the NCR.</p>
<p><b>ASA 1_3 Verification</b></p>	<p>Records of payslip and check-roll documents available to the workers for sample employees sighted as per indicator 6.1.6 and 6.2.2 above shown evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday</p>

	entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements. No recurrence of issue, hence Major NC remain closed.
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<b>Non-conformity</b>			
<b>NCR Ref #</b>	1864944-202001-M4	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	Indicator 6.2.4 Critical (Major)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	15/04/2020
<b>Statement of Nonconformity:</b>	Inadequate educational and welfare amenities to national standards and ILO Guidance on Workers Housing Recommendation No 115 and Workers' Minimum Housing & Amenities Act.		
<b>Requirement Reference:</b>	The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.		
<b>Objective Evidence:</b>	1 crèche at BB2 Div 2 estate was found not supplied with electricity during operating hours. The electricity supplied to the crèche is from 3am to 6am and 5pm to 11pm only. No electricity supply from 6am up to 5pm. As at time of audit, there are approximately 15 children placed at the crèche with 2 crèche nanny.		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>By April 2020, a portable genset will be provided mainly to be used by the crèche for electricity generation during day operating hours.</li> <li>Estate will be conducting a monitoring at the crèche on regular basis to ensure the facility runs with electricity supplies accordingly during operating hours.</li> </ol>		
<b>Assessment Conclusion:</b>	Evidence submitted: <ol style="list-style-type: none"> <li>Pictures to show that electricity has been supplied to the creche at its operation hours.</li> <li>Purchase order dated 17/2/2020 to a supplier that show purchase of a unit of generator set has been made.</li> <li>Inspection report dated 27/3/2020 by an Estate Hospital Assistant (EHA) that show the conditions of creche was monitored.</li> </ol> The evidence of the corrective actions was found to be adequate to close the NCR.		
<b>ASA 1_3 Verification</b>	Housing issue raised through Housing Repair Form as per sample sighted in mill dated on 2/3/2021 for any housing issue related to electrical, mechanical or civil such as repair of bed, table, cupboard, closet, doors, mosquito net, door knob, wiring, sinks, pipe, sockets, roofing, water tank, window glass, fan etc.  Inspection also conducted on monthly basis which latest done for March 2021 covering mil labour quarters (LQ)A - LQE. The mill kept Questionnaire Form entitled Provision of basic housing amenities to workers as well as House Inventory Listing for Workers; Doc. Ref. # IOI/P/F/HILW; Rev. # 01; Issue Date: 30/11/2020.  No recurrence of issue, hence Major NC remain closed.		



Non-conformity			
<b>NCR Ref #</b>	1864944-202001-N1	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	Indicator 1.1.5 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	17/02/2021
<b>Statement of Nonconformity:</b>	The current list of contact and details of stakeholders are not maintained adequately.		
<b>Requirement Reference:</b>	There is a current list of contact and details of stakeholders and their nominated representatives.		
<b>Objective Evidence:</b>	Stakeholder list provide found not updated with the current nominated representative and wrong contact number. Several sampled stakeholders were verified during the audit through stakeholder consultation, and found not updated with the current phone number and contact person / nominated representatives.		
<b>Corrective Actions:</b>	Supplementary party internal audit to be carried out regularly on the consistency of recording. The result of findings will be made transparent.		
<b>Assessment Conclusion:</b>	CAP has been accepted, verification of effectiveness to be conducted during next assessment.		
<b>ASA 1_3 Verification</b>	<p>Current list of contact and details of stakeholders and their nominated representatives available as per sighted as following:</p> <ul style="list-style-type: none"> <li>- Ladang Sabah POM List of External Stakeholders; Date: 1/2/2021</li> <li>- Luangmanis Estate List of External Stakeholders; Date: 11/2/2021</li> <li>- Moynod Estate List of External Stakeholders; Date: 2/1/2021</li> <li>- Sg. Sapi Estate List of External Stakeholders; Date: 22/1/2021</li> </ul> <p>No recurrence of issue found, hence Minor NC closed on 17/2/2021.</p>		

Non-conformity			
<b>NCR Ref #</b>	1864944-202001-N2	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	Indicator 2.2.2 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	17/02/2021
<b>Statement of Nonconformity:</b>	The FFB transport contractors for the estates did not comply with the vehicles' weight limit stipulated in the Commercial Vehicle Licensing Board in "Lesen Pembawa" (carrier license).		
<b>Requirement Reference:</b>	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.		
<b>Objective Evidence:</b>	The vehicles' weight limit [Berat Dengan Muatan (weight with load)] spelt out by the Commercial Vehicle Licensing Board in "Lesen Pembawa" (carrier license) is 21000 kg for the FFB Transport contractors. However, based on Ladang Sabah POM weighbridge tickets, it was found that the vehicles used to transport the FFB from the estates (Labuk, Bimbingan 1 and Bimbingan 2) to the mill had frequently		



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	exceeded the limit. E.g. of weighbridge tickets sampled: 719564, 719492, 719427, 719680, 719548, 719237, 719599 and 719534.
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. A meeting to remind all contractors will be carried out to reiterate company's commitment.</li> <li>2. For improvement, the contract agreement content will be revised to include a condition of disciplinary action against non-adherence to the legal and sustainability requirement and the company procedure.</li> <li>3. The load limit for each delivery will be monitored at the weighbridge office prior consignment being dispatched off by the Executive. Each weighbridge office will be have a summary of the vehicle carrier license record as reference for each of the registered vehicle for a cross checked. On-the-job training will be given to the responsible personnel at weighbridge office.</li> <li>4. Supplementary internal audit to be carried out on the said activity. The result of findings will be made transparent.</li> </ol>
<b>Assessment Conclusion:</b>	CAP has been accepted, verification of effectiveness to be conducted during next assessment.
<b>ASA 1_3 Verification</b>	<p>The requirements to comply with applicable laws are stipulated in the contract agreements. Sighted the contract agreement as following;-</p> <p>CPO Transporter</p> <ul style="list-style-type: none"> <li>- Rico Enterprise</li> <li>- KK Fong Sdn Bhd</li> <li>- Syarikat Perniagaan Pigrusyahlia Jaya</li> </ul> <p>PK Transporter</p> <p>Syarikat Pengangkutan Budi Bersaudara</p> <p>Among the applicable laws mentioned are:</p> <ul style="list-style-type: none"> <li>• Sabah Labour Ordinance</li> <li>• Passport Act</li> <li>• Anti-trafficking in Persons and Anti-Smuggling of Migrant Act</li> <li>• Immigration Act</li> <li>• SOCSO Act</li> <li>• Workmen Compensation Act</li> <li>• EPF</li> <li>• Minimum Wage Order</li> <li>• OSHA</li> <li>• EQA</li> <li>• Road Transportation Act</li> </ul> <p>No recurrence of issue found, hence Minor NC closed on 17/2/2021.</p>

Non-conformity			
<b>NCR Ref #</b>	1864944-202001-N3	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	Indicator 2.2.3 Minor
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	17/02/2021
<b>Statement of Nonconformity:</b>	Some of the contractors have yet to sign the contract agreement that contains clauses disallowing child, forced and trafficked labour.		

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<b>Requirement Reference:</b>	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.
<b>Objective Evidence:</b>	At Bimbingan 2 Estate, the following contractors have yet to sign the contract agreement that contains clauses disallowing child, forced and trafficked labour: <ul style="list-style-type: none"> <li>• Syarikat Mega Trading</li> <li>• Syarikat Perniagaan Niq</li> <li>• Million Enterprise</li> <li>• Cahaya Ayuni</li> <li>• Sinar Harapan</li> </ul>
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. To conduct due diligence process prior contractor engagement.</li> <li>2. Supplementary internal audit to be carried out on the activity of contractor and service provider. The result of findings will be made transparent.</li> </ol>
<b>Assessment Conclusion:</b>	CAP has been accepted, verification of effectiveness to be conducted during next assessment.
<b>ASA 1_3 Verification</b>	<p>Sighted the contract agreement as following;-</p> <p>CPO Transporter</p> <ul style="list-style-type: none"> <li>- Rico Enterprise</li> <li>- KK Fong Sdn Bhd</li> <li>- Syarikat Perniagaan Piqrusyahlia Jaya</li> </ul> <p>PK Transporter</p> <p>Syarikat Pengangkutan Budi Bersaudara</p> <p>The contract agreements for all the contractors contain clauses to disallow child, forced and trafficked labour which were written under subtitles "Sustainability Palm Oil Policy (SPOP)", "Sabah Labour Ordinance" and "Human Rights". These three subtitles made reference to IOI's SPOP and SLO.</p> <p>No recurrence of issue found, hence Minor NC closed on 17/2/2021.</p>

Opportunity for Improvement	
OFI#	Description
Nil	N/A

**3.4.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1582202-201801-M1	Major	4.1.2	26/01/2018	Closed on 25/03/2018
1582202-201801-N1	Minor	5.3.3	26/01/2018	Closed on 25/01/2019
1728629-201901-M2	Major	4.1.1	25/01/2019	Closed on 20/04/2019
1728629-201901-N1	Minor	2.1.3	25/01/2019	Closed on 17/01/2020
RSPO P&C MYNI 2019				
1864944-202001-M1	Critical (Major)	2.1.1	17/01/2020	Closed on 15/4/2020

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1864944-202001-M2	Critical (Major)	6.2.2	17/01/2020	Closed on 15/4/2020
1864944-202001-M3	Critical (Major)	6.2.3	17/01/2020	Closed on 15/4/2020
1864944-202001-M4	Critical (Major)	6.2.4	17/01/2020	Closed on 15/4/2020
1864944-202001-N1	Minor	1.1.5	17/01/2020	Closed on 17/2/2021
1864944-202001-N2	Minor	2.2.2	17/01/2020	Closed on 17/2/2021
1864944-202001-N3	Minor	2.2.3	17/01/2020	Closed on 17/2/2021
2023865-202102-N1	Minor	6.7.4	17/02/2021	Open
2036144-202103-M1	Critical (Major)	3.6.1	27/3/2021	Closed on 16/6/2021
2036144-202103-N1	Minor	7.11.3	27/3/2021	Open
2036144-202103-N2	Minor	4.2.3	27/3/2021	Open

**3.5 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 Ladang Sabah 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.

<b>List of Stakeholders contacted</b>	
<b>Internal Stakeholders</b> Mill operators Field workers Harvesters Gender committee chairpersons Estate Hospital Assistants Creche ayah	<b>Local community/Union/Contractors</b> Local workers JCC representative Foreign workers JCC representatives Local village representatives Neighbouring estate representatives Grocery store operator Mill & Estates vendor
<b>Government Departments</b> SK Sakilan Desa teachers	<b>NGO</b> Community Learning Centre (CLC) teachers

**Stakeholders comment**

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<p><b>1</b></p>	<p><b>Feedbacks:</b>          Mill &amp; Estates vendor: No issue in contractual works and supplied spare parts pricing and payment. Has long business relationship with company for more than 10 years.</p> <p><b>Management Responses:</b>          Positive comments noted.</p> <p><b>Audit Team Findings:</b>          No further issue.</p>
<p><b>2</b></p>	<p><b>Feedbacks:</b>          Neighbouring estate (Malsa Corporation): Managers been invited to latest stakeholder meeting and attended accordingly. Management of Ladang Sabah Estate communicated and explained well on RSPO sustainability requirements. Have good relationship with company management and no issues related to land and planting boundaries between both companies.</p> <p><b>Management Responses:</b>          Positive comments noted.</p> <p><b>Audit Team Findings:</b>          No further issue.</p>
<p><b>3</b></p>	<p><b>Feedbacks:</b>          Local &amp; foreign workers' JCC representatives: Most of workers felt stressful for not being able to go out of estate and housing compound due to voluntary lockdown enforced by management since January 2021. However, it is agreed among them that it is safer and whatsoever, estates management been very helpful to assist on workers needs including daily sundries.</p> <p><b>Management Responses:</b>          It was understood that the stressful condition among workers due to unable to go out of estate. Management provide full support mainly in providing workers needs with complete daily needs in grocery shops during this pandemic period for their own benefits as well as companies. Workers are provided with alternative to order through staff in-charges to go to town for other matters during this voluntary lockdown period.</p> <p><b>Audit Team Findings:</b>          No further issue.</p>
<p><b>4</b></p>	<p><b>Feedbacks:</b>          Grocery store/canteen operator: Had issues during Movement Control Order (MCO) and Conditional Movement Control Order (CMCO) period to buy shop's stock from wholesaler due to stringent enforcement by estate management that requires mandatory swab test every time out and come back in estate. Had discussion and allowed to conduct the swab test only if necessary, i.e. if have symptoms.</p> <p><b>Management Responses:</b>          Management must strictly follow company's directive in order to prevent occurrence and spread of COVID-19 case.</p> <p><b>Audit Team Findings:</b>          No further issue.</p>
<p><b>5</b></p>	<p><b>Feedbacks:</b>          Village (Kampung Lungmanis &amp; Kampung Pahu) representatives: No issue by mill and estate activities. Have good relationship with management of company and staff who are mostly among local villagers.</p>

	Company very helpful when local villagers have problem such as during the recent flood season by assisting to repair roads and aid with flood victim.
	<b>Management Responses:</b> Positive comments noted.
	<b>Audit Team Findings:</b> No further issue.
<b>6</b>	<b>Feedbacks:</b> Schools (SK Sakilan Desa & Humana School) representatives: Estate managements always visits and contributes to school programs and activities. 100% of children among estate foreign workers are schooling at Humana including from neighbour estate. School facilities were well maintained by company.
	<b>Management Responses:</b> Positive comments noted.
	<b>Audit Team Findings:</b> No further issue.

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
There is no customary rights land in the Ladang Sabah POM Certification Unit. All Estates & Mill within Ladang Sabah are the original first time ownership by IOI whom obtained the land from Sabah State government since 1980's.					




Previous land owner / user comment	
	<b>Feedbacks:</b> Nil
	<b>Management Responses:</b> N/A
	<b>Audit Team Findings:</b> N/A

### 3.6 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 remains appropriate. Based on the results of this audit, it is concluded that The Ladang Sabah Palm Oil Mill has complied with the RSPO Principles and Criteria 2018 for Sustainable Palm Oil (Malaysia National Interpretation 2019) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Ladang Sabah Palm Oil Mill is continued.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name:</b> Hafriazhar Mohd. Mokhtar	<b>Name:</b> <b>A PRAKASH</b> SR. PLANTATION CONTROLLER
<b>Company Name:</b> BSI Services Malaysia Sdn. Bhd.	<b>Company Name:</b> SANDAKAN REGION
<b>Title:</b> Client Manager	<b>Title:</b> 
<b>Signature:</b> 	<b>Signature:</b> (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.) 
<b>Date:</b> 18/6/2021	<b>Date:</b> 22/06/2021

**Appendix A: Summary of Findings**

Criterion / Indicator		Assessment Findings	Compliance
<b>Principle 1: Behave ethically and transparently</b>			
<b>Criterion 1.1</b>			
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><b>(C)</b> Documents that are specified in the RSPO P&amp;C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Publicly available management documents such as land titles, OHS plans, EIA, SIA, HCV documentation, pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, RSPO Public Summary Report, company policies and continual improvement plans are available and can be cross referred to their respective criterion.</p> <p>All operating units have individual documents and records to demonstrate compliance to this indicator. IOI Group documents are also accessible through their Group’s website link: <a href="http://www.ioigroup.com">http://www.ioigroup.com</a></p>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Information provided in English and Bahasa Melayu accessible to all stakeholders in IOI complex with translation on the information provided by the management to requested party mainly among foreign workers . More information publicly available can be access through web <a href="https://www.ioigroup.com/Content/S/S_Define">https://www.ioigroup.com/Content/S/S_Define</a>, this include Sustainable Palm Oil Policy, Sustainable implementation update and others.</p>	Complied
1.1.3	<p><b>(C)</b> Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>Ladang Sabah POM and estates kept both external and internal stakeholder request in the Letter To/From Stakeholder File and Complaint/grievance book. Among the request sighted as per sample as following:</p>	Complied

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		<ul style="list-style-type: none"> <li>- DOSH Sandakan requests to Ladang Sabah POM upon latest mill inspection; Date: 4/1/2021</li> <li>- DOE Sandakan requests to Ladang Sabah POM upon latest mill visit; Date: 22/1/2020</li> </ul>	
1.1.4	<p><b>(C)</b> 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>IOI Corporation Berhad has developed Stakeholder Request Procedure for Corporate Level and Estate Level and Grievance Procedure (Staff Grievances Standard of Procedure).</p> <p>The flowchart has detailed out the process of request by the stakeholders. Stakeholders can access to <a href="http://www.ioigroup.com">www.ioigroup.com</a>, call IOI Group General Line or write formal letter to Head Office of IOI if they have any requests or complaints. The stakeholders need to be informed of outcome within 5 working days.</p> <p>Latest procedure briefing was conducted during internal stakeholder at respective unit as following:</p> <ul style="list-style-type: none"> <li>- Ladang Sabah POM workers; Date: 13/11/2020</li> <li>- Luangmanis Estate workers; Date: 18/12/2020</li> <li>- Moynod Estate workers; Date: 15/6/2020</li> <li>- Sg. Sapi Estate workers; Date: 25/1/2021</li> </ul> <p>Consultation meeting scheduled with external stakeholders were cancelled for 2020 due to COVID-19 pandemic and replace with indirect consultation through letters and email attached with public documents including consultation and communication procedures.</p>	Complied
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>Current list of contact and details of stakeholders and their nominated representatives available as per sighted as following:</p> <ul style="list-style-type: none"> <li>- Ladang Sabah POM List of External Stakeholders; Date: 1/2/2021</li> </ul>	Complied



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		<ul style="list-style-type: none"> <li>- Luangmanis Estate List of External Stakeholders; Date: 11/2/2021</li> <li>- Moynod Estate List of External Stakeholders; Date: 2/1/2021</li> <li>- Sg. Sapi Estate List of External Stakeholders; Date: 22/1/2021</li> </ul>	
<p><b>Criterion 1.2</b>          The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
<p>1.2.1</p>	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>The Business Ethics, Compliance, Anti-Corruption and Anti-Money Laundering Policy was available dated September 2018. The management of Ladang Sabah Certification Unit already communicate the policy in all business operation including during stakeholder meeting and induction. IOI Group’s employees and directors are not allowed to accept or give courtesies, which involve cash or cash equivalents, or which could be evaluated as illegal or improper exchanges. In addition, government or public servants may be under strict guidelines, preventing them from receiving courtesies. Offering courtesies to government or public officials may be considered as a legal offence in certain countries.</p> <p>The briefing of Policy was conducted at respective unit as following:</p> <ul style="list-style-type: none"> <li>- Ladang Sabah POM workers; Date: 13/11/2020</li> <li>- Luangmanis Estate workers; Date: 18/12/2020</li> <li>- Moynod Estate workers; Date: 15/6/2020</li> <li>- Sg. Sapi Estate workers; Date: 25/1/2021</li> </ul> <p>Consultation meeting scheduled with external stakeholders were cancelled for 2020 due to COVID-19 pandemic and replace with indirect consultation through letters and email attached with public documents including ethical conduct policy.</p>	<p>Complied</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>Mechanism for ensuring compliance is described in the “Mechanism of Tracking Law Changes”, dated 27/7/2018. The sustainability team is responsible to monitor implementation/updating of information through routine monitoring and internal audit.</p> <p>Internal Audit for Ladang Sabah certification unit was conducted from 19-22/10/2020 by internal auditors from Sustainable Palm Oil Department. Also, for ensure the compliance of Business conduct &amp; ethics by Sandakan Town Office, Procedure of controlling the disclosure of confidential information (for third party) estate dated 2011 has been established to ensure the compliance and the implementation of the policy and overall ethical business practice.</p>	Complied
<p><b>Principle 2: Operate legally and respect rights</b></p>			
<p><b>Criterion 2.1</b>          There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	<p><b>(C)</b> The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>All relevant and applicable legal requirements had been identified by Ladang Sabah POM and its supply base. It incorporated the latest amendments, that is, OSH (Noise Exposure) Regulations 2019, Minimum Wages Order 2020 and Prevention and Control of Infectious Diseases (Compounding of Offences) (Amendment) (No.6) Regulations 2020. At the assessed operating units, the following were noted to be complied.</p> <p>Ladang Sabah POM</p> <ol style="list-style-type: none"> <li>1. MPOB License; License Number: 500264104000; License Expiry Date: 30/06/2021.</li> <li>2. DOE License; License Number: 003445; License Expiry Date: 30/06/2021.</li> </ol>	Complied

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		<p>3. DOE License [Lesen Pelanggaran (Udara Bersih) 2014]; License Number: 005200; License Expiry Date: 30/08/2021.</p> <p>4. JTK Salary Deduction Permit; Permit Number: 600-1/2/8/320 (11/SDK/2020-0272); License Expiry Date: 12/04/2022.</p> <p>5. JTK Salary Advance Permit; Permit Number: 600-1/2/8/320 (06/SDK/2019-0153); License Expiry Date: 23/04/2021.</p> <p>6. JTK License to Employ Non-Residential Workers; License Number: JTK.H.SDK.600-4/1/01261/003867; License Expiry Date: 16/09/2021.</p> <p>7. Competent person for scheduled waste (CePSWaM/00311) Mr Jimi Bin Dalinting</p> <p>Luangmanis Estate</p> <p>1. Air Compressor License; License Number: PMT-SB/20 33970; License Valid till: 19/10/2021.</p> <p>2. Energy Commission License (Private Installation); License Number: 2020/02841; Serial Number: 47163; License Validity Period: 01/01/2021 – 31/12/2021</p> <p>3. MPOB License; License Number: 501728102000; License Period: 01/05/2020 till 30/04/2021</p> <p>4. Diesel License; License Reference Number: PPDNKK.SDK.18/2002 (SK); Serial Number: P(Q2001); Storage Capacity: 18,400 Litre; License Validity: 03/01/2021 – 02/01/2024.</p> <p>Moynod Estate</p>	
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		<ol style="list-style-type: none"> <li>1. Energy Commission License (Private Installation); License Number: 2020/01405; Serial Number: 44079; License Validity Period: 24/06/2020 – 23/06/2021.</li> <li>2. MPOB License: License Number: 501728102000; License Period: 01/05/2020 till 30/04/2021</li> <li>3. MPOB License (Nursery); License Number: 61637601100; License Validity Period: 01/04/2020 – 31/03/2021</li> <li>4. Air Compressor License; License Number: PMT-SB/20 38025; License Valid till 29/03/2022</li> </ol> <p>Sungai Sapi Estate</p> <ol style="list-style-type: none"> <li>1. Air Compressor License; License Number: PMT-SB/21 38153; License Valid till 03/04/2022</li> <li>2. MPOB License: License Number: 501728102000; License Period: 01/05/2020 till 30/04/2021</li> <li>3. Diesel License; License Reference Number: PPDNKK.SDK.20/2002 (SK); P Series Number: S002393; Storage Capacity: 18,200 Litre; License Validity: 03/03/2020 – 02/03/2021.</li> </ol>	
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>Written information on legal requirements was documented and maintained in "Legal Requirements Register", dated 01/11/2020 prepared by SPO Department Sandakan Regional Office. Among the registered laws were:</p> <ul style="list-style-type: none"> <li>- Prevention and Control Infection Disease Act 1988 – Prevention and control of infectious Diseases (Measure within the infected Local Areas) Reg 2020</li> <li>- Minimum Wages Order 2020</li> </ul>	Complied

		- Employee Minimum Standards of Housing , Accommodations and Amenities Reg 2020.Occupational Safety and Health (Noise Exposure) Reg 2019.	
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance -	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries as per sample for boundaries between IOI Moynod and Smallholder that are clearly demarcated and visibly maintained with blue colour at Palm in field P96A and Mr Gabriel Ungat farm.	Complied
<b>Criterion 2.2:</b>			
All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements			
2.2.1	A list of contracted parties is maintained. - Minor compliance -	List of all contracted parties were maintained in the operating units' stakeholder list. The latest list was updated in FY 2021. Among the stakeholders registered were government agencies, neighbouring estates, neighbouring villages, NGO, contractors, suppliers and service providers.	Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -	The requirements to comply with applicable laws are stipulated in the contract agreements. Among the applicable laws mentioned are: <ul style="list-style-type: none"> <li>• Sabah Labour Ordinance</li> <li>• Passport Act</li> <li>• Anti-trafficking in Persons and Anti-Smuggling of Migrant Act</li> <li>• Immigration Act</li> <li>• SOCSO Act</li> <li>• Workmen Compensation Act</li> <li>• EPF</li> <li>• Minimum Wage Order</li> <li>• OSHA</li> <li>• EQA</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>Road Transportation Act</li> </ul>	
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>The contract agreements for all the contractors contain clauses to disallow child, forced and trafficked labour which were written under subtitles "Sustainability Palm Oil Policy (SPOP)", "Sabah Labour Ordinance" and "Human Rights". These three subtitles made reference to IOI's SPOP and SLO.</p>	Complied
<p><b>Criterion 2.3:</b>            All FFB supplies from outside the unit of certification are from legal sources.</p>			
2.3.1	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>Information on geo-location of FFB origins</li> <li>Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>One or more supporting documents for claims</li> <li>Valid MPOB license</li> </ul> <p>- Critical (Major) compliance -</p>	<p>Not applicable as the mill received only certified FFB from own IOI Group estates.</p>	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>	<p>Not applicable as the mill received only certified FFB from own IOI Group estates.</p>	Not Applicable
<p><b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b></p>			
<p><b>Criterion 3.1</b>            There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			
3.1.1	<p><b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p>	<p>Mill annual budget and management plan were documented with five years projection that include monthly breakdown for FFB production, CPO, PK, OER, and KER, costs of production, CAPEX and OPEX. There was no scheme smallholder within the supply base.</p>	Complied

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	<p>- Critical (Major) compliance -</p>	<p>The business plan was available for Ladang Sabah POM and its supply base.</p> <p>The estate business plan covers Crop by Year of planting, Replanting Programme, Executive/Staff and Workers Requirement, Mature Oil Palm Costing Statement, General Charges and Capital Expenditure Statement and depreciation.</p>																																	
<p>3.1.2</p>	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>The replanting program projected for the next 10 years was available at the estates assessed. The annual replanting program sampled for 5 years as shown in table below:-</p> <table border="1" data-bbox="1137 687 1928 1380"> <thead> <tr> <th>Estate</th> <th>Year</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td rowspan="5">Luangmanis Estate</td> <td>2020/2021</td> <td>122</td> </tr> <tr> <td>2021/2022</td> <td>341</td> </tr> <tr> <td>2022/2023</td> <td>304</td> </tr> <tr> <td>2023/2024</td> <td>297</td> </tr> <tr> <td>2024/2025</td> <td>326</td> </tr> <tr> <td rowspan="5">Moynod Estate</td> <td>2020/2021</td> <td>300</td> </tr> <tr> <td>2021/2022</td> <td>233</td> </tr> <tr> <td>2022/2023</td> <td>231</td> </tr> <tr> <td>2023/2024</td> <td>206</td> </tr> <tr> <td>2024/2025</td> <td>220</td> </tr> <tr> <td rowspan="3">Sungai Sapi Estate</td> <td>2020/2021</td> <td>119</td> </tr> <tr> <td>2021/2022</td> <td>161</td> </tr> <tr> <td>2022/2023</td> <td>247</td> </tr> </tbody> </table>	Estate	Year	Ha	Luangmanis Estate	2020/2021	122	2021/2022	341	2022/2023	304	2023/2024	297	2024/2025	326	Moynod Estate	2020/2021	300	2021/2022	233	2022/2023	231	2023/2024	206	2024/2025	220	Sungai Sapi Estate	2020/2021	119	2021/2022	161	2022/2023	247	<p>Complied</p>
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			2023/2024	219																						
			2024/2025	223																						
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken. - Minor compliance -	The frequency for management review is once annually after annual Internal SPO Audit at each Operating Unit as shown in table below.	<table border="1"> <thead> <tr> <th>Operating Unit</th> <th>Internal Audit Date</th> <th>Internal Audit Findings</th> <th>Management Review Date</th> </tr> </thead> <tbody> <tr> <td>Ladang Sabah POM</td> <td>22/10/2020</td> <td>1 Major Nonconformity</td> <td>26/10/2020</td> </tr> <tr> <td>Luangmanis Estate</td> <td>15/10/2020</td> <td>1 Major &amp; 1 Minor Nonconformities</td> <td>18/11/2020</td> </tr> <tr> <td>Moynod Estate</td> <td>16/10/2020</td> <td>2 Major Nonconformities</td> <td>23/10/2020</td> </tr> <tr> <td>Sungai Sapi Estate</td> <td>12/10/2020</td> <td>1 Major &amp; 1 Minor Nonconformities</td> <td>20/10/2020</td> </tr> </tbody> </table>			Operating Unit	Internal Audit Date	Internal Audit Findings	Management Review Date	Ladang Sabah POM	22/10/2020	1 Major Nonconformity	26/10/2020	Luangmanis Estate	15/10/2020	1 Major & 1 Minor Nonconformities	18/11/2020	Moynod Estate	16/10/2020	2 Major Nonconformities	23/10/2020	Sungai Sapi Estate	12/10/2020	1 Major & 1 Minor Nonconformities	20/10/2020	Complied
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<p><b>Criterion 3.2</b></p> <p>The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>																										
3.2.1	<b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance -	The continuous improvement plan was available dated 30/12/2020. The plan covers Social, Environment, Safety and Technology. Environmental - To install new signage for all HCV area and conduct training on HCV to workers				Complied																				



		<ul style="list-style-type: none"> <li>- To retrain staff and workers on Integrated Pest Management</li> <li>- To enhance recycle programmed in estate</li> </ul> <p>Safety and Health</p> <ul style="list-style-type: none"> <li>- To build new shower room for sprayer and manuring workers</li> <li>- Build up the new tyre cage for safety purpose</li> <li>- To install fences at workshop area for safety reason.</li> </ul> <p>Social</p> <ul style="list-style-type: none"> <li>- To construct 2 new staff house</li> <li>- To construct 6 unit of new labour quarters</li> <li>- To brief guidelines regarding to Women Empowerment to workers</li> <li>- To keep give awareness to workers pertaining to sexual harassment</li> </ul>	
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><b>PROCEDURAL NOTE:</b></p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>It is noted that RSPO has not finalized the RSPO metric template. Communication with RSPO Secretariat was made and noted that the indicator is not applicable until the template is finalized.</p> <p>Notwithstanding the unavailability of the RSPO metrics template, IOI Group maintains submitting its ACOP and RSPO GHG Calculations to the RSPO Secretariat.</p>	Complied
<p><b>Criterion 3.3</b>          Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			

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<p>3.3.1</p>	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.          - Critical (Major) compliance -</p>	<p>Standard Operating Procedures (SOPs) in the form of written document for estates and mills are documented and maintained. It covers procedures as required by the RSPO P&amp;C 2018 (MYNI:2019).</p> <p>The company's management process and operations are guided by the following documents:</p> <ol style="list-style-type: none"> <li>1. Group Standard Operating Procedures (StOP) for Estate Operations, Doc Date: 05/12/2007</li> <li>2. Group Standard Operating Procedures (StOP) for Palm Oil Mill Operations, Doc Date: 01/07/2017</li> <li>3. Group Safe Operating Procedures (SaOP)</li> <li>4. Group Occupational Safety and Health Guidance for Estate Workers</li> </ol> <p>The StOPs reflects best industry practices as detailed in IOI's Agricultural Policy document. Aside from the StOPs, for operations of mill and estates, there exists also SaOPs for management such as:</p> <ol style="list-style-type: none"> <li>1. Consultation and communication</li> <li>2. Negotiation on compensation.</li> <li>3. Guidance and procedure for gifts and hospitality.</li> <li>4. Selection and contracting of contractors including recruitment agencies</li> <li>5. Employment procedures for recruitment, selection, hiring, promotion, retirement and/or termination.</li> <li>6. Procedures for Supply Chain.</li> <li>7. Internal Audit procedure for Supply Chain</li> <li>8. Remediation and Compensation Procedure (RaCP)</li> <li>9. Accident and emergency procedures</li> <li>10. Proper disposal of waste material</li> </ol>	<p>Complied</p>
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3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	There are mechanism to check implementation of Standard Operating Procedure in Operation such as Internal audit, Agronomist, and Senior plantation controller. Internal audit conducted by Sustainable Team on 16/10/2020 and Agronomist report ref: Adv/Sabah/MYN dated 19/1/2021. Senior Plantation Controller visit was on 28/2/2021	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	Documented information such as records of monitoring, reports and completed checklists and any subsequent action required together with follow-up until closure of complaints and grievances, non-conformity/non-compliance were available and maintained. Sighted medical surveillance report, Supply Chain record, RTE animal sightings filled-up checklists, etc. whose record retention time varies complying to legal requirements.  Sampling in monitoring record in Ladang Sabah POM, the mill monitor the Local Exhaust Ventilation(LEV) been done yearly basis and latest record was on 10/7/2020 done by Dynakey Laboratories Sdn Bhd as per report IHT(II)/2020/0702/LSPOM and previously was conducted on 10/7/2020 also done by Dynakey Laboratories Sdn Bhd as per report ref: IHT(II)/2019/0703/LSPOM. For Monthly inspection was done by lab operator and record latest was on 3/3/2021 and previously was on 11/2/2021.	Complied
<p><b>Criterion 3.4</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	<b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -	No new planting in sampled estates within Ladang Sabah certification unit. Latest Annual Review for Social Impact Assessment (SIA) and Environmental Impact Assessment (EIA) for all operating units visited was conducted in 2018 and reviewed on	Complied

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		<p>annually basis documented in Environment Impact Assessment Management Action Plans &amp; Continuous Improvement Plan.</p> <p>For existing operation available as per Annual Review for Social Impact Assessment Management Action Plans &amp; Continuous Improvement Plan Ladang Sabah Palm Oil Mill; Report ref. # IOI/SR/SPO/2020/SIA/annual/04; Date prepared: February 2021; Date next review: February 2022. Report prepared by Jackcarry Suati; Social Liaison Officer and approved by Wilfred Moikong; Mill Manager.</p> <p>For replanting area, Ladang Sabah Group Estate has conducted the environmental impact assessment as per report Proposed Replanting of 16,688 Hectares of Oil Palm Plantations at Ladang Sabah Group Estate, District of Beluran, Sabah by IOI Corporation Bhd, with ref. no. KWEC-(EV)/10/20-10.</p>	
<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>The mill and estates visited has established the social and environmental management plan based on the review of impact assessments conducted as Continuous Improvement Plan. Amongst all, sample plan including the following:</p> <p>Social</p> <ul style="list-style-type: none"> <li>- To construct 2 new staff house</li> <li>- To construct 6 unit of new labour quarters</li> <li>- To brief guidelines regarding to Women Empowerment to workers</li> <li>- To keep give awareness to workers pertaining to sexual harassment</li> </ul> <p>Environmental</p> <ul style="list-style-type: none"> <li>- To install new signage for all HCV area and conduct training on HCV to workers</li> <li>- To retrain staff and workers on Integrated Pest Management</li> </ul>	<p>Complied</p>

<p>3.4.3</p>	<p><b>(C)</b> 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>- To enhance recycle programmed in estate</p> <p>SIA plan established has summarize the issues raised, potential impacts to social, action plans and monitoring programme as well as management review and comments. The review done through consultation with internal and external stakeholders in 2020. Consultation meeting scheduled with external stakeholders were cancelled for 2020 due to COVID-19 pandemic and replace with indirect consultation through letters and email with use of feedbacks forms. No negative feedbacks received from stakeholders.</p> <p>Other sample records of monitoring plan include the followings:</p> <ul style="list-style-type: none"> <li>- The mill conducted stack emission monitoring twice a year follow regulation as stated in the compliance schedule. Reviewed the stack emission monitoring reports with ref. no. LSPOM/ST-B2/2020 dated 17/10/2020 and LSPOM/ST-B3/2020/2 dated 04/02/2021. The results was not conform to emission limit of 150 mg/m3 as per Environmental Quality (Clean Air) Regulation 2014. However, the mill has acquired Contradiction License no. 005200 and compliance schedule ref. no. ASSH(B)31/152/000/096 from DOE.</li> <li>- The estate monitor the collection and disposal of recycle waste items. Reviewed the recycle waste generated from January 2020 till 24/03/2021 recorded at 1t 170 kg and disposal records as per official receipt no. 11951 dated 24/03/2021 in Moynod Estate.</li> <li>- The domestic waste collection was collected once a week. Sighted the landfill located in field P98B in Moynod Estate, P96B in Sg. Sapi Estate and P95A in Luangmanis Estate. No evidence of scheduled waste disposed in the landfill.</li> </ul>	<p>Complied</p>
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		- River water sampling was conducted once every 4 months as per Environmental Compliance Report for Ladang Sabah submitted to NREB. Refer report ref. no. KWEC-(EV)/M/20. Results for all estates visited conform to NWQSM Class IIB.	
<b>Criterion 3.5</b>			
A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable. - Minor Compliance -	SOP for Workers on HR Matter (Ref No: IOI/SRO/HRD/20-156) includes the employment Procedure for Workers, Retirement, Termination, Absconded Foreign Workers, Resignation & Repatriation Process Flow for Foreign Workers established as guideline.  Additionally, in Sabah, there is SOP for Legalization Programme (HRD/REC-REG/01/2019) for workers, Foreign Workers Recruitment Guideline & Procedures in Malaysia dated July 2018, Procedure of New Workers Recruitment with Valid Pass (Ref no: HRD/REC-VP/01/2019) and Procedure of New Workers Recruitment (Ref no: HRD/REC-NW/01/2019) for IOI Plantation Division Sabah  Employment contracts also stated the termination clause where the period of resignation notice is agreed by both parties: 4 weeks for service less than 2 years, 6 weeks for services more than 2 years but less than 5 years and 8 weeks for service more than 5 years or more or between agreement of both parties.	Complied
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	Based on the employment contract, passport and pay slips reviewed in 6.5.2, the procedure of recruitment was implemented and records are maintained.	Complied
<b>Criterion 3.6</b>			
An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			

<p>3.6.1</p>	<p><b>(C)</b> All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.          - Critical (Major) compliance -</p>	<p>All operations in the mill and estates are risks assessed. The risks assessments are done in accordance with the legal requirements and management’s commitments towards best practises.</p> <p>Ladang Sabah POM</p> <ol style="list-style-type: none"> <li>1. Risk assessment is done for all operations and projected in the HIRARC form covering the identification and control measures to prevent or reduce the identified risks. The HIRARC was last updated on 10/01/2021. The HIRARC was available for verification which included risks associated to Security, Weighbridge, FFB Grading, Loading Ramp and Sterilizer.</li> <li>2. Chemical Health Risk Assessment (CHRA) was conducted to assess the risks and hazards associated with the usage of hazardous chemicals in the mill. The assessment was conducted by DAB OH Sdn Bhd (HQ/11/ASS/00/298-2018/146) on 01/11/2018. The management have implemented an action plan to comply with the recommendations provided by the assessor in the CHRA Report.</li> <li>3. An Initial Noise Risk Assessment has been conducted in the mill on 30/10/2020 – 02/11/2020 by Dr Mohd Azizan Bin Abdul Aziz (DOSH Registration Number: HQ/18/PEB/00/00024). The noise risk assessment was carried out in order to comply with Regulation 4: OSH (NOISE EXPOSURE) Regulation 2019. The management have implemented an action plan to comply with the recommendations provided by the assessor in the NRA Report.</li> <li>4. Audiometric Test was conduct for 81 workers in the mill to monitor the risk and effects of the noise generated by the mill on the workers. The test conducted on 03/07/2020 concluded</li> </ol>	<p>Non-compliance</p>
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		<p>that 71 workers was having normal hearing and 10 workers was diagnosed to have hearing impairment. No workers was diagnosed to have Standard Threshold Shift in the mill. The Audiometric Test Report recommended that the 10 workers with hearing impairment to go for annual audiometric test.</p> <ol style="list-style-type: none"> <li>5. Examination, Inspection and Testing of Local Exhaust Ventilation (LEV) System was conducted in the mill by Dynakey Laboratories Sdn Bhd on 10/07/2020. The LEV Report concluded that the inspection, examination and testing of local exhaust ventilation located at the mill is currently effective in its performance safe to be used.</li> <li>6. For PTW verification on Digester maintenance as per PTW 0076 dated 29/12/2020. The health verification was done by management as per recommendation ICOP 2010. The gas Tester been done by Mr Ikwan ( NW-NDSK-AGT-0021-P valid until 11/4/2021). For authorisation entry by Mr Zulkiflee (NW-SBRO-AGT-0076-S)</li> </ol> <p>Luangmanis Estate</p> <ol style="list-style-type: none"> <li>1. Chemical Health Risk Assessment (CHRA) was conducted to assess the risks associated with the hazardous chemicals used in the estate operations. The assessment was conducted by DAB OH Sdn Bhd (HQ/11/ASS/00/298-2019/198) on 06/01/2020 – 10/01/2020. The recommendation provided by the assessor is stated in the CHRA Action Plan and monitored for compliance by the estate management.</li> <li>2. An Initial Noise Risk Assessment has been conducted in the estate on 05/11/2020 by Dr Mohd Azizan Bin Abdul Aziz (DOSH Registration Number: HQ/18/PEB/00/00024). The management have implemented an action plan to comply with</li> </ol>	
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		<p>the recommendations provided by the assessor in the NRA Report.</p> <ol style="list-style-type: none"> <li>3. Mobile Audiometric Test was conduct for 39 workers in the estate to monitor the risk and effects of the noise generated by the estate on the workers. The test conducted on 11/01/2021 is pending the results.</li> <li>4. Medical Surveillance was conducted for 22 pesticide handlers in the estate deemed to be exposed to the chemicals. The assessment was conducted on 11/01/2019 by DAB OH Sdn Bhd. The medical surveillance reported that all 22 workers were fit to work with no abnormal results.</li> </ol> <p>Moynod Estate</p> <ol style="list-style-type: none"> <li>1. In compliance with OSHA Act 1994 and the USECHH Regulations 2000, Moynod Estate carried out the CHRA Assessment at the estate on 20/02/2018. The CHRA Assessment was done by DAB OH Sdn Bhd ( DOSH Number: JKPP KIM127/453/6 (30).</li> <li>2. Initial Noise Risk Assessment has been conducted in the estate on 07/11/2020 by Dr Mohd Azizan Bin Abdul Aziz (DOSHS Registration Number: HQ/18/PEB/00/00024). The management have implemented an action plan to comply with the recommendations provided by the assessor in the NRA Report.</li> <li>3. Mobile Audiometric Test was conduct for 18 workers in the estate to monitor the risk and effects of the noise generated by the estate on the workers. The test conducted on 11/02/2021 is pending the results.</li> <li>4. Found Sprayer workers was using general trailer (not passenger trailer) without safety precaution as per HIRARC</li> </ol>	
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recommendation (Reviewed dated 10/1/2021) from field to Office thus Major NC been raise during this Audit.

Sungai Sapi Estate

1. The assessed estates keep a central register for all H&S issues identified. The register captured hazards recognized, its risk assessed and counter measures recommended to minimize or prevent the risks. The register has been developed for significant routine and non-routine activities and updated. It was last reviewed on 01/02/2021. Among the sampled HIRARC verified included Harvesting, Loose Fruit Collection, Transporting Fertilizer, Chemical Spraying and Rat Bait Application.
2. Chemical Health Risk Assessment (CHRA) was conducted to assess the risks associated with the hazardous chemicals used in the estate operations. The assessment was conducted by DAB Sdn Bhd (HQ/11/ASS/00/298-2019/196) on 06/01/2020 – 10/01/2020. The recommendation provided by the assessor is stated in the CHRA Action Plan and monitored for compliance by the estate management.
3. Initial Noise Risk Assessment has been conducted in the estate on 09/11/2020 by Dr Mohd Azizan Bin Abdul Aziz (DOSH Registration Number: HQ/18/PEB/00/00024). The management have implemented an action plan to comply with the recommendations provided by the assessor in the NRA Report.
4. Mobile Audiometric Test was conduct for 10 workers in the estate to monitor the risk and effects of the noise generated by the estate on the workers. The test conducted on 11/02/2021 is pending the results.

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3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p> <p>- Major Compliance -</p>	<p>The effectiveness of H&amp;S plan to address health and safety risks was available in estate as per sampling below:-</p> <p>Moynod Estate</p> <p>Initial Noise Risk Assessment has been conducted in the estate on 07/11/2020 by Dr Mohd Azizan Bin Abdul Aziz (DOSH Registration Number: HQ/18/PEB/00/00024). The management have implemented an action plan to comply with the recommendations provided by the assessor in the NRA Report.</p> <p>Mobile Audiometric Test was conduct for 18 workers in the estate to monitor the risk and effects of the noise generated by the estate on the workers. The test conducted on 11/02/2021, result showed 17 workers with normal audiogram and 1 abnormal audiogram. For the abnormal result was in progress to send for OHD verification as per letter ref MYNSB/SHS/001-2021 date 23/3/2021. The training on hearing conservation conducted on 12/1/2021 by Dr Azizan.</p> <p>Luang Manis estate</p> <p>The implementation of H&amp;S was available in estate, the first aid training been conducted according to plan, dated 15/1/2021 by EHA (Pn. Yusrina Binti Abdullah) at Klinik Luangmanis attended by 17 first aider. For medical surveillance been conducted on 11/1/2021 at DAB OH Sdn Bhd with total 32 workers included sprayer, Mechanic, water treatment and genset.</p>	Complied
<p><b>Criterion 3.7</b>  All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
3.7.1	<p><b>(C)</b> 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</p>	<p>Formal training program for the year 2021 was established and made available at the beginning of each Financial Year and implemented accordingly. Training identification and needs</p>	Complied

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	<p>aspects of the RSPOP&amp;C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>analysis were applied to recognize the staff, workers and contractor’s deficient skills or knowledge gaps, particularly, in aspects of RSPO P&amp;C and the Supply Chain Certification System.</p> <p>There is no associated smallholders at this Certification Unit and thus no training given to them.</p> <p>Following the training given, regular assessment of training was conducted either by the Trainer or their immediate Supervisor to evaluate trainees’ understanding. Else, refresher course will be organized.</p> <p>Training methodology given to workers are commonly On-The-Job Training, Coaching/Mentoring and Hands-on Practical Session with plenty of Graphical/Pictorial illustration than wordings as these approach get their attention and better understanding.</p>													
<p>3.7.2</p>	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Training records were observed to be updated and maintained. In general, the identified trainings covered the aspects of safety, environment, best practices and social. Sampled a few of the following training records at the respective assessed operating units, given in 2020 and 2021.</p> <p>Moynod Estate</p> <table border="1" data-bbox="1153 1034 1928 1334"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Nursery, SDS &amp; PPE Training</td> <td>04/01/2020</td> </tr> <tr> <td>Policy Briefing</td> <td>10/01/2020</td> </tr> <tr> <td>Awareness on Sexual Harassment</td> <td>28/08/2020</td> </tr> <tr> <td>Recycle Waste Training</td> <td>30/11/2020</td> </tr> <tr> <td>Driver &amp; Loader Training</td> <td>11/11/2020</td> </tr> </tbody> </table>	Training	Date	Nursery, SDS & PPE Training	04/01/2020	Policy Briefing	10/01/2020	Awareness on Sexual Harassment	28/08/2020	Recycle Waste Training	30/11/2020	Driver & Loader Training	11/11/2020	<p>Complied</p>
Training	Date														
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Driver & Loader Training	11/11/2020														

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		Sg Sapi Estate			
		Training	Date		
		Personal Hearing Protectors Training	14/12/2020		
		Working At Height Training	28/01/2020		
		Schedule Waste Training	16/10/2020		
		HCV Awareness Training	15/12/2020		
		Workshop Training	12/01/2021		
		Ladang Sabah POM			
		Training	Date		
		Chemical Handling Training	14/09/2020		
		NADOPOD Regulation Training	22/09/2020		
		Confined Space & PTW Training	19/09/2020		
		Working at Height Awareness Training	19/02/2020		
		SDS & Chemical Usage Training	14/09/2020		
		Luang Manis Estate			
		Training	Date		
		Manuring and SDS Training	14/12/2020		
		Chainsaw & Genset Training	28/11/2020		
		Bees and Snakes Identification Training	12/11/2020		

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		<table border="1"> <tr> <td>HCV Conservation Training</td> <td>06/08/2020</td> </tr> <tr> <td>Creche Ayah Training</td> <td>30/04/2020</td> </tr> </table>	HCV Conservation Training	06/08/2020	Creche Ayah Training	30/04/2020	
HCV Conservation Training	06/08/2020						
Creche Ayah Training	30/04/2020						
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>There were three trainings conducted related to RSPO SC since the last assessment, i.e.:</p> <p>i) Sustainability briefing certification &amp; supply chain by SPO Dept., conducted on 4/12/2019, attended by 17 participants from the mill</p> <p>ii) Assistant give briefing certification &amp; supply chain to control critical point such as weighbridge operator, security, clerk and others, conducted on 30/11/2020, attended by 14 participants</p> <p>iii) Assistant give briefing &amp; supply chain Certification Standard with Transporter &amp; Contractor by the Assistant Mill Manager, conducted on 10/2/2021, attended by 11 participants included Pengangkutan Ya Hen Sdn Bhd, Juita Baru Sdn Bhd, K.K Fong Sdn Bhd, Uniharverst Sdn Bhd and Pengangkutan Dagang Tera Sdn Bhd</p>	Complied				
<p><b>Criterion 3.8</b>  Supply chain requirement for mills (<b>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</b>)</p>							
3.8.1	Identity Preserved Module	The mill received and processed only certified FFB from own company group estates. A procedure, RSPO Supply Chain –	Complied				

	<p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;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>Identity Preserve (IP) [doc. No.: RSPOSC/SOP/IP/3, rev. 8, dated 31/10/2020] was developed to implement the IP supply chain system at the POM. The procedure is applicable for incoming FFB, outgoing CPO &amp; PK at RSPO certified mills that operate IP supply chain system. The procedure has also covered the subjects of overproduction, handling of complaints and non-conformities product.</p>	
3.8.2	<p><b>Mass Balance Module</b></p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p>	<p>Ladang Sabah POM deemed to be Identity Preserved (IP) since the FFB processed mill are sourced from own company group estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C).</p>	Complied
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&amp;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>	Complied
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>The mill met all registration and reporting requirements for the IP module through the RSPO IT platform. Registered information from PalmTrace shown the following:</p> <ul style="list-style-type: none"> <li>- Member Name: Ladang Sabah Sdn Bhd - Ladang Sabah Palm Oil Mil</li> <li>- PalmTrace Member ID: RSPO_PO1000000541</li> <li>- RSPO Membership Number: 2-0002-04-000-00</li> </ul>	Complied

<p>3.8.5</p>	<p><b>Documented procedures</b>          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> <ol style="list-style-type: none"> <li>a. Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>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.</li> <li>d. The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</li> </ol>	<p>IOI Group has developed procedures to implement the elements of the applicable supply chain model as below:</p> <ul style="list-style-type: none"> <li>• RSPO Supply Chain – Identity Preserve (IP) [doc. No.: RSPOSC/SOP/IP/3, rev. 8, dated 31/10/2020]</li> <li>• Internal Audit Procedure, Doc. No.: RSPOSC/SOP/IA/1, Rev. 02 dated 20/12/2018.</li> </ul> <p>The Mill Manager has an overall responsibility and authority over the implementation of the procedure, requirements and compliances with all the applicable RSPO Supply Chain Certification Standard and assisted by Assistant Managers, Engineers and Technical Executives as per stated in its procedure.</p> <p>FFB were obtained from all IOI’s certified estates only. There was no third party’s crop nor non-certified FFB received by the mill.</p>	<p>Complied</p>
<p>3.8.6</p>	<p><b>Internal Audit</b></p> <ol style="list-style-type: none"> <li>i. The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;             <ol style="list-style-type: none"> <li>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>b. Effectively implements and maintains the standard requirements within its organisation.</li> </ol> </li> <li>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</li> </ol>	<p>IOI Group has developed Internal Audit Procedure, Doc. No.: RSPOSC/SOP/IA/1, Rev. 02 dated 20/12/2018 for conducting RSPO SCCS and RSPO Rules on Market Communications and Claims internal audit.</p> <p>Latest internal audit was conducted on 22/10/2020 by the SPO Department Sandakan Region. The coverage of internal audit has included the General Chain of Custody Requirements for the Supply Chain and Module D: Identity Preserved. No non-conformity raised on SCCS from the internal audit.</p>	<p>Complied</p>



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	review at least annually. The mill shall maintain the internal audit records and reports.		
3.8.7	<p><b>Purchasing and Goods In</b></p> <ul style="list-style-type: none"> <li>i. The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</li> <li>ii. The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</li> <li>iii. The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</li> </ul>	<p>The accompanying documents of incoming FFB from own estate are estate’s weighing bridge tickets which has the info about name of estate, RSPO certificate number, weighbridge ticket number, seal number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill issues its weighbridge ticket as confirmation of receipt. The estate’s ticket number is recorded in the mill’s ticket number.</p> <p>There has been no projected overproduction. Nonetheless, based on interview with the staff, the facility is aware of this requirement. The mechanism for handling non-conforming oil palm products and/or documents is addressed under RSPOSC/SOP/IP/3 Clause 12 which describes the non-certified material or product shall be kept segregated from the certified ones.</p>	Complied
3.8.8	<p><b>Sales and Goods Out</b></p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> <li>a. The name and address of the buyer;</li> <li>b. The name and address of the seller;</li> <li>c. The loading or shipment / delivery date;</li> <li>d. The date on which the documents were issued;</li> <li>e. RSPO certificate number;</li> <li>f. A description of the product, including the applicable supply chain</li> </ul>	<p>Based on samples of CPO &amp; PK sales contracts/PO/sales confirmation and their samples of accompanying shipping documents corresponding to the contracts, all the required information in the standard was available. E.g. of shipping documents verified:</p> <ul style="list-style-type: none"> <li>- Sales contract/purchase order</li> <li>- Commercial invoice</li> <li>- Delivery notes/Weighbridge tickets</li> <li>- Certificate of analysis</li> <li>- Goods receipt confirmation from buyer/buyer’s weighbridge tickets</li> </ul>	Complied

	<p>model (Identity Preserved or Mass Balance or the approved abbreviations);</p> <ul style="list-style-type: none"> <li>g. The quantity of the products delivered;</li> <li>h. Any related transport documentation;</li> <li>i. A unique identification number.</li> </ul>		
<p>3.8.9</p>	<p><b>Outsourcing Activities</b></p> <ul style="list-style-type: none"> <li>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</li> <li>ii. The mill shall ensure the following: <ul style="list-style-type: none"> <li>a. The mill has legal ownership of all input material to be included in outsourced processes</li> <li>b. The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</li> <li>c. The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>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.</li> </ul> </li> </ul>	<p>The mill have updated procedure on handling, refer title RSPO Supply Chain -Identity Preserve (IP) RSPOSC/SOP/IP/3 Rev: 08 dated 31/10/2020.</p> <p>Outsourcing only applicable for CPO despatch based on the delivered contract with buyers. No outsourcing for PK despatch that have ex-mill contracts with buyers. Sighted the contract agreement as following;-</p> <p>CPO Transporter</p> <ul style="list-style-type: none"> <li>- Rico Enterprise</li> <li>- KK Fong Sdn Bhd</li> <li>- Syarikat Perniagaan Pigrusyahlia Jaya</li> </ul> <p>PK Transporter</p> <ul style="list-style-type: none"> <li>- Syarikat Pengangkutan Budi Bersaudara</li> </ul> <p>Sampling on KK Fong Sdn Bhd and Ladang Sabah Sdn Bhd dated August 2019. This agreement valid until 31/7/2022. It cover all requirement as per criteria 3.8.9</p>	<p>Complied</p>

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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.	The mill have a record of all contact detail for transporter and updated. The record was stated under stakeholder list dated Jan 2020.	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 changes of transporter and the mill aware on requirement to inform CB in advance in case of new outsource contractor appointed.	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>iv. For Mass Balance Module, the mill:             <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> </ul> </li> </ul>	<p>Ladang Sabah 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 D – CPO Mills: 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 &amp; 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><b>Extraction Rate</b></p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. The previous actual OER &amp; KER available in Table 10 of full public summary report.</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>As per mill monthly production records, the record was updated and available for reviewed.</p>	Complied
3.8.15	<p><b>Processing</b></p> <p>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>The mill have updated procedure on handling, refer title RSPO Supply Chain -Identity Preserve (IP) RSPOSC/SOP/IP/3 Rev: 08 dated 31/10/2020. From the record verification no outsider FFB accepted in Ladang Sabah POM. The FFB source only from supply base as per RSPO Ladang Sabah certificate.</p>	Complied
3.8.16	<p><b>Registration of Transactions</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul>	<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><b>Claims</b></p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>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 Trademark License from RSPO. The trademark license# is 2-0002-04-100-03 which is valid from 19/12/2019 to 18/12/2021.</p>	Complied
<b>General corporate communications</b>			

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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.	IOI Group has made "off-product" claim by highlighted its commitment towards RSPO and certification of RSPO in the company's website: <a href="https://www.ioigroup.com/Content/BUSINESS/B_Product">https://www.ioigroup.com/Content/BUSINESS/B_Product</a>	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.	IOI Group has made "off-product" claim by highlighted its commitment towards RSPO and certification of RSPO in the company's website: <a href="https://www.ioigroup.com/Content/BUSINESS/B_Product">https://www.ioigroup.com/Content/BUSINESS/B_Product</a>	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.	IOI Group does not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	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.	IOI Group ensure 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.	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 RSPO corporate logo used as evidence during the document audit and site visit.	Complied
<b>Business to business communications</b>			

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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 sales contract 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.	The requirements of the RSPO SCCS are adhered to and was verified from the sampled weighbridge tickets of the sales of CPO.	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.	Not applicable as Ladang Sabah POM is neither distributors nor wholesalers.	Not Applicable
<b>Business to consumer communication</b>			
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.	Ladang Sabah POM does not made any product specific claim.	Complied
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.	Not applicable to Ladang Sabah POM as they do not conduct business to consumer claims.	Not Applicable

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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.	Not applicable to Ladang Sabah POM as they do not conduct business to consumer claims.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Not applicable to Ladang Sabah POM as they do not conduct business to consumer claims.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Not applicable to Ladang Sabah POM as they do not conduct business to consumer claims.	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.	Not applicable to Ladang Sabah POM as they do not conduct business to consumer claims.	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.	Not applicable to Ladang Sabah POM as they do not conduct business to consumer claims.	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 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 <a href="http://www.rspo.org">www.rspo.org</a> .	There was no use of RSPO Trademark logo used on product claim.	Complied

<b>MODULE A – IDENTITY PRESERVED &amp; SEGREGATED SPECIFIC RULES</b>			
<b>Certified oil palm content (IP)</b>			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	Oil palm content is 100% CPO and claim as RSPO IP-certified.	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	Not Applicable for Ladang Sabah POM.	Not Applicable
	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.	Oil palm content is 100% CPO and claim as RSPO IP-certified. All infeed material (FFB) is RSPO certified.	Complied
<b>Labelling and trademark (IP)</b>			
	Members are allowed to use the RSPO label in one of the following ways: a. RSPO trademark which includes the tag 'CERTIFIED' or b. 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 communications, the RSPO trademark can be printed anywhere on the pack.	As at to date, no RSPO trademark used by the facility.	Complied
<b>Messaging (IP)</b>			
	Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements: <ul style="list-style-type: none"> <li>The oil palm products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li> </ul>	As at to date, no RSPO trademark used by the facility.	Complied



	<ul style="list-style-type: none"> <li>• By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.</li> </ul>		
<p><b>Principle 4: Respect community and human rights and deliver benefits</b></p>			
<p><b>Criterion 4.1</b></p>			
<p>The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>IOI Group has developed Sustainable Palm Oil Policy dated October 2020 where the company respects and uphold the rights of all workers, including contract, temporary and migrant workers in accordance with the Universal Declaration of Human Rights, International Labour Organization’s core conventions, United Nations Guiding Principles on Business and Human Rights and the principles of Free and Fair Labour in Palm Oil Production.</p> <p>Latest procedure briefing was conducted during internal stakeholder at respective unit as following:</p> <ul style="list-style-type: none"> <li>- Ladang Sabah POM workers; Date: 13/11/2020</li> <li>- Luangmanis Estate workers; Date: 18/12/2020</li> <li>- Moynod Estate workers; Date: 15/6/2020</li> <li>- Sg. Sapi Estate workers; Date: 25/1/2021</li> </ul>	<p>Complied</p>

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		<p>Consultation meeting scheduled with external stakeholders were cancelled for 2020 due to COVID-19 pandemic and replaced with indirect consultation through letters and email attached with public documents including relevant sustainability policies and procedures. Policy also available in company's website:  <a href="https://www.ioigroup.com/Content/S/pdf/Sustainable%20Palm%20Oil%20Policy.pdf">https://www.ioigroup.com/Content/S/pdf/Sustainable%20Palm%20Oil%20Policy.pdf</a></p>	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.            - Minor compliance -</p>	<p>As per Sustainable Palm Oil Policy dated March 2018, the company will eliminate all forms of illegal, forced, bonded, compulsory or child labour and in particular, follow responsible recruitment practices including not charging recruitment related fees at any stage in the recruitment process, whether by us, our contractors, our agents or their sub-agents in receiving and sending countries. No changes from previous year.</p>	Complied
<p><b>Criterion 4.2</b>            There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties</p>			
4.2.1	<p><b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.            - Critical (Major) compliance -</p>	<p>IOI Corporation Berhad has developed and implemented Whistleblowing Policy, revised on October 2019 where the objective of the policy is to provide an avenue for all employees of IOI Group and all other stakeholders to raise concerns about any improper conduct within IOI Group. The policy is designed to provide transparent and confidential process for dealing with concerns. The policy has ensured protection to whistle-blowers where the person may choose to remain anonymous when reporting. The whistleblowing investigation shall be completed within 2 weeks from date of receiving the whistleblowing.            Based on the records of complaints and grievances no issue of whistle-blowing that requires anonymity of complainants and/or grievance parties since last audit. Interview conducted with internal</p>	Complied

		stakeholders among workers and relevant external stakeholders also confirmed the information.	
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>Procedures available and communicated during the Annual Review Social Impact Assessment with external and internal stakeholders as below:</p> <ol style="list-style-type: none"> <li>1. Stakeholder Request Procedure</li> <li>2. Grievance Procedure</li> <li>3. Sexual Harassment Grievance Procedure</li> <li>4. Grievance Procedure for Land Owner</li> </ol> <p>Based on the records of complaints and grievances no issue of whistle-blowing that requires anonymity of complainants and/or grievance parties since last audit. Interview conducted with internal stakeholders among workers and relevant external stakeholders also confirmed that they understood the procedures.</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>All the complaints/request were solved within timeframe which is less than 2 weeks. This is verified in the Complaint/Grievance book sampled as below:</p> <ol style="list-style-type: none"> <li>1. Luangmanis Estate: Request to prolong the electricity period for ceremony, requested by staff on 06/03/2020. Status is approved.</li> <li>2. Ladang Sabah POM: Damage lamp at living hall on 23/07/2020. Status is completed.</li> <li>3. Moynod Estate: Damage septic tank at worker's house on 13/02/2020. Status is completed on 15/02/2020.</li> </ol> <p>During visit to Sg. Sapi and consultation with external stakeholders from school, the representative was asking on the status of the feedback given to the estate. Based on records of communication</p>	Non-compliance

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		<p>(<i>Borang Maklumbalas; Lampiran 4</i>) with information of grievances and complaints received from the school representative dated 28/1/2021 and records of time bound action plan for identified social aspects related to the feedbacks, it was found that there's insufficient evidence that the grievance parties been informed of the grievance progress including against agreed timeframe and the outcome is not made available and communicated to the relevant stakeholders. The timeframe has also exceeded the period as per Grievance Procedure as following:</p> <table border="1" data-bbox="1137 670 1921 1125"> <thead> <tr> <th>Stage</th> <th>Timeframe</th> </tr> </thead> <tbody> <tr> <td>1: Grievance submission</td> <td>Acknowledge grievance submitted through Green Book, hotline or ECC immediately or within 24 hours</td> </tr> <tr> <td>2: Preliminary investigation</td> <td>Investigate within 30 working days from grievance submission date</td> </tr> <tr> <td>3: Further investigation/meeting with complainant</td> <td>Meet up with complainant within 10 working days after preliminary investigation outcome</td> </tr> </tbody> </table> <p>Furthermore, some previous letters of requests received from external stakeholder and estate's response to the requests made was unable to be determined either the requester has received and/or acknowledge the response or not. <b>Hence, a minor nonconformity was raised on the matter.</b></p>	Stage	Timeframe	1: Grievance submission	Acknowledge grievance submitted through Green Book, hotline or ECC immediately or within 24 hours	2: Preliminary investigation	Investigate within 30 working days from grievance submission date	3: Further investigation/meeting with complainant	Meet up with complainant within 10 working days after preliminary investigation outcome	
Stage	Timeframe										
1: Grievance submission	Acknowledge grievance submitted through Green Book, hotline or ECC immediately or within 24 hours										
2: Preliminary investigation	Investigate within 30 working days from grievance submission date										
3: Further investigation/meeting with complainant	Meet up with complainant within 10 working days after preliminary investigation outcome										
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to	IOI Group has given public access for grievance mechanism in website: <a href="http://www.ioigroup.com">www.ioigroup.com</a> where the Grievance Procedure dated	Complied								

	<p>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>20 Jan 2020 has mention: Process flow Page 2 and General terms &amp; definitions page 5: Third party: if required during the process, IOI and the complainant can agree to involve a neutral third-party facilitator, mediator or specific social, environmental expert, particularly where issues are complex or multiple groups are involved.</p>	
<p><b>Criterion 4.3</b>          The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
<p>4.3.1</p>	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>As a group level, IOI has the corporate social responsibility program and stated in website:  <a href="https://www.ioigroup.com/Content/CI/Corp_Responsibilities">https://www.ioigroup.com/Content/CI/Corp_Responsibilities</a>          Among sample contributions are as following:</p> <ul style="list-style-type: none"> <li>- Dec 2020: Yayasan Tan Sri Lee Shin Cheng continued to support Dual Blessing Bhd by donating RM30,000 and 10 computers worth RM20,000 to its IT hub, which provides training and skills to the disabled community.</li> <li>- Oct 2020: IOI Edible Oils Sdn Bhd supplied 10 pairs of goggles, spray equipment, and 15 units of steel beds to help frontliners during the COVID-19 pandemic.</li> <li>- Sept 2020: IOI Plantation Services Sdn Bhd, assisted by the Malaysian Palm Oil Board’s Beluran Branch, reached out to Kamansi Village and held a three-hour interactive programme with villagers under the Sustainable Palm Oil Cluster (SPOC) to address sustainability and traceability-related issues and concerns. The programme was successful as these villagers will obtain their Malaysian Sustainable Palm Oil certification under the SPOC Scheme soon.</li> </ul>	<p>Complied</p>
<p><b>Criterion 4.4</b></p>			

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.			
4.4.1	<p><b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) 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>Documents showing legal ownership available as per sighted land titles samples as following:</p> <ul style="list-style-type: none"> <li>- Moynod &amp; Luangmanis Estate: Land title # Country Lease 085317497; Area: 5,766 ha; Lease period: 1/1/1984 – 31/12/2082</li> <li>- Sg. Sapi Estate: Land title # Country Lease 085322578; Area: 1,299.5 ha; Lease period: 1/1/1989 – 31/12/2087</li> </ul> <p>Visit to sites and consultation with stakeholders confirmed all estates within Ladang Sabah POM certification unit are not encumbered by any customary rights.</p>	Complied
4.4.2	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p>	<p>There's no new leasing of land recorded since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit.</p> <p>In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.</p>	Complied
4.4.2a	<p>Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.</p> <p>- Minor compliance -</p>	<p>There's no new leasing of land recorded since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit.</p> <p>In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.</p>	Complied

4.4.2b	<p>Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.</p> <p>- Minor compliance -</p>	<p>There's no new leasing of land recorded since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit.</p> <p>In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.</p>	Complied
4.4.2c	<p>Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p> <p>- Minor compliance -</p>	<p>There's no new leasing of land recorded since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit.</p> <p>In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.</p>	Complied
4.4.3	<p><b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>Maps available as GIS generated map which internally surveyed by GIS Department, survey dated 14.3.2018, GIS Data used based on Mar 2017. As this is not new development, these maps are no required to developed through participatory mapping.</p>	Complied
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>There's no new leasing of land recorded since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit.</p> <p>In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.</p>	Complied
4.4.5	<p><b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>There's no new leasing of land recorded since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit.</p>	Complied

		In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.	
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	There's no new leasing of land recorded since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit.  In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.	Complied
<b>Criterion 4.5:</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user 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	<b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	Demonstrable rights of land ownership were verified as per land title issued by the Director of Land and Surveys Office, Government of State of Sabah. Land tenure and ownership history is as shown in Indicator 4.4.1 above.	Complied
4.5.2	<b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -	There's no new planting since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit.  In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.	Complied
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement	There's no new planting since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit.	Complied



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	with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -	In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.	
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -	There's no new planting since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit. In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.	Complied
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	There's no new planting since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit. In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.	Complied
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	There's no new planting since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit. In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.	Complied
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's no new planting since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit. In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.	Complied
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation.	There's no new planting since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit.	Complied

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	- Critical (Major) compliance -	In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.	
<b>Criterion 4.6</b>			
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	<p><b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>There's no new planting since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit.</p> <p>In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.</p>	Complied
4.6.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>There's no new planting since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit.</p> <p>In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	<p>There's no new planting since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit.</p> <p>In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.</p>	Complied
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	<p>There's no new planting since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit.</p> <p>In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.</p>	Complied
<b>Criterion 4.7</b>			

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	<p><b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>There's no new planting since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit.</p> <p>In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.</p>	Complied
4.7.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p> <p>- Critical (Major) compliance -</p>	<p>There's no new planting since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit.</p> <p>In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.</p>	Complied
4.7.3	<p>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.</p> <p>- Minor compliance -</p>	<p>There's no new planting since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit.</p> <p>In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.</p>	Complied
<p><b>Criterion 4.8</b></p> <p>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.</p>			
4.8.1	<p>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.</p> <p>- Minor compliance -</p>	<p>There's no new planting since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit.</p> <p>In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.</p>	Complied

4.8.2	<p><b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>There's no new planting since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit.</p> <p>In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.</p>	Complied
4.8.3	<p>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)</p> <p>- Minor compliance -</p>	<p>There's no new planting since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit.</p> <p>In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.</p>	Complied
4.8.4	<p>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).</p> <p>- Minor compliance -</p>	<p>There's no new planting since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit.</p> <p>In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.</p>	Complied
<p><b>Principle 5: Support smallholder inclusion</b></p>			
<p><b>Criterion 5.1</b>  The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
5.1.1	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	<p>There's no new planting since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit.</p> <p>In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.</p>	Complied

5.1.2	<p><b>(C)</b> 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).</p> <p>- Critical (Major) compliance -</p>	<p>There's no new planting since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit.</p> <p>In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.</p>	Complied
5.1.3	<p><b>(C)</b> Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>There's no new planting since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit.</p> <p>In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.</p>	Complied
5.1.4	<p><b>(C)</b> 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>There's no new planting since the last audit. Visit to sites and consultation with stakeholders confirmed there's no record of land dispute for all estates within Ladang Sabah POM certification unit.</p> <p>In case of FPIC, the Grievance Procedure for Land Owner will be use to handle the process.</p>	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Not applicable since there are no smallholders within the Ladang Sabah POM certification unit.</p>	Not applicable
5.1.6	<p><b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Not applicable since there are no smallholders within the Ladang Sabah POM certification unit.</p>	Not applicable
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>Not applicable since there are no smallholders within the Ladang Sabah POM certification unit.</p>	Not applicable

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 -	This indicator is not applicable since Ladang Sabah POM did not source its FFB from smallholders	Not Applicable
5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	This indicator is not applicable since Ladang Sabah POM did not source its FFB from smallholders.	Not applicable
<b>Criterion 5.2</b>			
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 -	There is no smallholders scheme or send their FFB to Ladang Sabah POM. Ladang Sabah POM is receive FFB only from its own supply bases.	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 -	There is no smallholders scheme or send their FFB to Ladang Sabah POM. Ladang Sabah POM is receive FFB only from its own supply bases.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	There is no smallholders scheme or send their FFB to Ladang Sabah POM. Ladang Sabah POM is receive FFB only from its own supply bases.	Not Applicable

5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	There is no smallholders scheme or send their FFB to Ladang Sabah POM. Ladang Sabah POM is receive FFB only from its own supply bases.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	There is no smallholders scheme or send their FFB to Ladang Sabah POM. Ladang Sabah POM is receive FFB only from its own supply bases.	Not Applicable
<b>Principle 6: Respect workers' rights and conditions</b>			
<b>Criterion 6.1:</b> Any form of discrimination is prohibited.			
6.1.1	<b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	IOI Group has developed and implemented Equal Opportunity Employment & Freedom of Association Policies dated October 2017 in both languages where the company respects the freedom of association and collective bargaining to the workers. The workers have the right to join or form trade unions of their own choosing without prior authorization and to bargain collectively. Latest policy briefing was conducted during internal stakeholder meeting at respective units as following: - Ladang Sabah POM workers; Date: 13/11/2020 - Luangmanis Estate workers; Date: 18/12/2020 - Moynod Estate workers; Date: 15/6/2020 - Sg. Sapi Estate workers; Date: 25/1/2021 Consultation meeting scheduled with external stakeholders were cancelled for 2020 due to COVID-19 pandemic and replace with indirect consultation through letters and email attached with public documents including relevant sustainability policies and procedures. Policy also available in company's website:	Complied

		<a href="https://www.ioigroup.com/Content/S/pdf/Sustainable%20Palm%20Oil%20Policy.pdf">https://www.ioigroup.com/Content/S/pdf/Sustainable%20Palm%20Oil%20Policy.pdf</a>	
6.1.2	<p><b>(C)</b> 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>	Records of employments and interview conducted on-site with sampled internal and external stakeholders confirmed that the workers and groups including local communities, women, and migrant workers have not been discriminated against.	Complied
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>IOI Group practices to conduct medical check-up prior recruitment of workers or continue of employment of workers as per the Procedure of Recruitment of Workers. If the result of FOMEMA found unfit, the workers will be repatriate. The recruitment of workers will be based on the medical fitness of workers.</p> <p>Sighted sample advertisements and records of new employee's recruitments as well as promotion of exiting employees confirmed that it was based on skills, capabilities, qualities and medical fitness necessary. Interview conducted with sample workers found that no unfair recruitment has occurred in the company.</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>Pregnancy testing was conducted only for women employee involved in chemical handling work to ensure no pregnant women working with the risk of chemical exposure. All women employees involved in chemical handling work within Ladang Sabah certification unit underwent Urine Pregnancy Test (UPT) conducted by Hospital Assistant with prior consent (<i>Surat Persetujuan Menjalani Ujian Kehamilan</i>) based on <i>Garis Panduan Kesehatan Reprodutif</i>, Date: 15/1/2020; Ref. # IOI/G/SE/002 in All Estate as per record sample as following:</p> <ul style="list-style-type: none"> <li>- <i>Pemeriksaan Ujian Kehamilan (Urine Pregnancy Test) Bagi Pekerja Am (General Worker)</i>; Date: 28/12/2020; Division: Moynod Division 2</li> </ul>	Complied



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		<ul style="list-style-type: none"> <li>- Mill done as part of Monthly Medical Check Up; Doc Ref. # IOI-OSH 3.3.4.3; Rev. # HSE/2019/REV01; Appendix 13</li> <li>- Luangmanis Estate sample employee # (office clerk – quarterly UPT) last conducted on 25/3/2021 and employee # (sprayer – monthly UPT)</li> </ul>	
6.1.5	<p><b>(C)</b> 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>IOI Group has developed and implemented Garis Panduan Pelaksanaan Women and Empowerment Committee (WEC) Ref No: IOI/G/SE/001 Rev 01 dated 17/02/2020 where the function of the committee has been clearly outlined in the procedure. Besides, the policy has ensured that the victim can be remained anonymous and will not be subject to any form of retaliatory action for submitting the complaint. All grievances submitted will remained as confidential.</p> <p>The Women and Empowerment Committee was established in all operating units within Ladang Sabah POM certification unit. Meeting conducted periodically, as per sample sighted as following:</p> <ul style="list-style-type: none"> <li>- Women &amp; Empowerment Committee (WEC) Minutes of Meeting Sg. Sapi Estate; Date: 21/12/2020; Venue: Sg. Sapi Estate Office</li> <li>- Ladang Sabah Palm Oil Mill Minutes of Meeting Women &amp; Empowerment Committee # 2/2020; Date: 17/7/2020</li> </ul> <p>No issue was reported during the meeting. Interviewed with the female workers confirmed that they are understood the procedure to lodge complaint if they have any sexual harassment cases. As to date, there was no case of sexual harassment reported as informed by them.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>Evidence of equal pay for the same work scope available as per sample sighted as following:</p> <p>Ladang Sabah POM:</p>	Complied

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		<ul style="list-style-type: none"> <li>- Female employee ID # 1SLS/IOI/1015/9001; Post: Mill Operator; March 2020 salary: RM 1,205.65</li> <li>- Male employee ID # 1SLS/IOI/0317/8997; Post: Mill Operator; March 2020 salary: RM 1,443.60</li> </ul> <p>Moynod Estate:</p> <ul style="list-style-type: none"> <li>- Female employee ID # 1SLS/IOI/1010/7341; Post: Field Worker; June 2020 salary: RM 1,177.45</li> <li>- Male employee ID # 1SLS/IOI/0219/7366; Post: Harvester; June 2020 salary: RM 1,444.00</li> </ul> <p>Luangmanis Estate:</p> <ul style="list-style-type: none"> <li>- Female employee ID # 1SLS/IOI/1015/9001; Post: General Worker; October 2020 salary: RM 1,150.25</li> <li>- Male employee ID # 1SLS/IOI/0417/5873; Post: Harvester; October 2020 salary: RM 1,753.55</li> </ul> <p>Sg. Sapi Estate:</p> <ul style="list-style-type: none"> <li>- Female employee ID # 1SLS/IOI/1016/9475; Post: Field Manurer; June 2020 salary: RM 1,131.20</li> <li>- Male employee ID # 1SLS/IOI/1016/8444; Post: Sprayer; June 2020 salary: RM 1,188.65</li> </ul>	
<p><b>Criterion 6.2</b>          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>			
6.2.1	<p><b>(C)</b> 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>Details of pay and conditions of employment are stated and documented in the Employment Agreement given to all workers and staff in Ladang Sabah POM Certification Unit. The documents are prepared in dual-language, i.e. English and another language that the worker is conversant in (either Indonesia or Philippine). The contract stipulates terms of conditions of service such position,</p>	Complied

		<p>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 documents are signed by the Human Resources Manager and the worker, and dated.</p>	
<p>6.2.2</p>	<p><b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.          - Critical (Major) compliance -</p>	<p>Employment contracts detailing payments and conditions of employment available to the workers for sample employees sighted as per indicator 6.1.6 above. Regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with Sabah Labour Ordinance and Minimum Wages Order.</p> <p>Other samples also sighted for following workers:</p> <p>Mill:</p> <ol style="list-style-type: none"> <li>1) Abdul Hadi Bin Rasmu</li> <li>2) Andi Juli</li> <li>3) Archdeboney Tsau</li> <li>4) Ardy Bin Johari</li> <li>5) Asimah Binti Babba</li> <li>6) Zuladlan Bin Saharan</li> <li>7) Vidaylin Binti Asmit</li> </ol> <p>Luangmanis Estate:</p> <ol style="list-style-type: none"> <li>1) Darno Bin Daru; Cutter; M</li> <li>2) Dewa Bin Hamadia; Cutter; M</li> <li>3) Ernie; Manurer; F</li> <li>4) Hana; Sprayer; F</li> <li>5) Indo Tang Binti Sire; Chreche Ayah; F</li> <li>6) Neni Binti Messi; Sprayer; F</li> <li>7) Saffar Layar; Driver; M</li> <li>8) Samsul Bin Kude; General Maintenance; M</li> </ol>	<p>Complied</p>

		<p>9) Jusma Binti Habang; Carrier; F</p> <p>Moynod Estate:</p> <ol style="list-style-type: none"> <li>1) Ansar; Harvester; M</li> <li>2) Bunga Tan Binti Ambo Sakka; Sprayer; F</li> <li>3) Elisabeth Agnes Masrinus; Manurer; F</li> <li>4) Hamidi Herman; Harvester; M</li> <li>5) Jaswandi Wawan; EFB Mulching; M</li> <li>6) Mira Daodah; Manurer; F</li> <li>7) Siti Asiah Abdullah; Field Worker; F</li> <li>8) Suherman Samsu; Field Worker; M</li> <li>9) Suzila Binti Irfan; Sprayer; F</li> </ol> <p>Sg. Sapi Estate:</p> <ol style="list-style-type: none"> <li>1) Aco; Sprayer; M</li> <li>2) Andis Bin Tarima; Harvester; M</li> <li>3) Damayanti Dahlan; General Worker; F</li> <li>4) Hamsina Binti Mapiare; General Worker; F</li> <li>5) Ismail Bin Yusuf; Harvester; M</li> <li>6) Marna Binti Dise; General Worker; F</li> <li>7) Mohd Sofian Bin Salleh; Driver; M</li> <li>8) Pato Dg Tata; Harvester; M</li> <li>9) Sainab Andi Hamsa; Manurer; F</li> </ol>	
6.2.3	<p><b>(C)</b> 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>Records of payslip and check-roll documents available to the workers for sample employees sighted as per indicator 6.1.6 and 6.2.2 above shown 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>	Complied

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6.2.4	<p><b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Housing issue raised through Housing Repair Form as per sample sighted in mill dated on 2/3/2021 for any housing issue related to electrical, mechanical or civil such as repair of bed, table, cupboard, closet, doors, mosquito net, door knob, wiring, sinks, pipe, sockets, roofing, water tank, window glass, fan etc.</p> <p>Inspection also conducted on monthly basis which latest done for March 2021 covering mil labour quarters (LQ)A - LQE. The mill kept Questionnaire Form entitled Provision of basic housing amenities to workers as well as House Inventory Listing for Workers; Doc. Ref. # IOI/P/F/HILW; Rev. # 01; Issue Date: 30/11/2020.</p>	Complied
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>Based on the sample records, Ladang Sabah POM monitored through records of price comparison in sundry shop available within workers housing area. Sighted price comparison made for the month of Sep-20, Oct-20, Nov-20, Dec-20, Jan-21 &amp; Feb-21 samples of sundry shop groceries and food prices monitoring conducted by Luangmanis Estate for common sundry shop with Terusan Baru Estate of Kedai Runcit Normah Trading; Dated 19/11/2020.</p>	Complied
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><b>PROCEDURAL NOTE:</b></p> <p><b>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</b></p> <p><b>(Endorsed by the RSPO BoG on 7th November 2019)</b></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 endeavor to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which</p>	<p>IOI has engaged Monash University on the Decent Wages in the Malaysia Palm Oil Industry and the report published on 02/04/2020. The topic discussed includes the living wage benchmark, site visits and foreign workers.</p> <p>In summary, based on the worker’s nationality, the decent living wage after taking into consideration of income tax, social security, food cost and housing cost it can be concluded that the nett living wage based on nationalities is as below:</p> <ol style="list-style-type: none"> <li>1. Indonesia: RM 1,183.907</li> <li>2. India: RM 791.26</li> <li>3. Bangladesh: RM 1,088.50</li> </ol>	OFI

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<p>no Global Living Wage Coalition (GLWC) benchmarks exist (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><b><i>Where a GLWC living wage standard (benchmark), or one that fulfills the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></b></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><b><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</i></b></p>	<p>Notwithstanding a Gross Living Wage Calculation (GLWC)/prevailing wage assessment conducted for whole IOI Group mill and estates. However, it could be further specified for estates in Sabah.</p>	
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	<p><b><i>Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage</i></b> (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).</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"> <li>• Updated assessment on prevailing wages and in-kind benefits</li> <li>• There is annual progress on the implementation of living wages</li> <li>• 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</li> <li>• 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.</li> </ul> <p>- Minor compliance -</p>		
6.2.7	<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>Employment contracts detailing payments and conditions of employment available to the permanent workers employed as per samples sighted in indicator 6.1.6 and 6.2.2 above. No casual, temporary and day labour employed within all operating units within Ladang Sabah certification unit.</p>	Complied
<b>Criterion 6.3</b>			

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<p>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><b>(C)</b> 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>IOI Group has developed and implemented Equal Opportunity Employment &amp; Freedom of Association Policies dated October 2017 in both languages where the company respects the freedom of association and collective bargaining to the workers. The workers have the right to join or form trade unions of their own choosing without prior authorization and to bargain collectively.</p> <p>Latest policy briefing was conducted during internal stakeholder meeting at respective units as following:</p> <ul style="list-style-type: none"> <li>- Ladang Sabah POM workers; Date: 13/11/2020</li> <li>- Luangmanis Estate workers; Date: 18/12/2020</li> <li>- Moynod Estate workers; Date: 15/6/2020</li> <li>- Sg. Sapi Estate workers; Date: 25/1/2021</li> </ul> <p>Consultation meeting scheduled with external stakeholders were cancelled for 2020 due to COVID-19 pandemic and replace with indirect consultation through letters and email attached with public documents including relevant sustainability policies and procedures.</p> <p>Policy also available in company's website:  <a href="https://www.ioigroup.com/Content/S/pdf/Sustainable%20Palm%20Oil%20Policy.pdf">https://www.ioigroup.com/Content/S/pdf/Sustainable%20Palm%20Oil%20Policy.pdf</a></p>
<p>6.3.2</p>	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia)</p>



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		<p>and made available upon request as per samples minutes of meeting sighted as following:</p> <ul style="list-style-type: none"> <li>- <i>Minit Mesyuarat Jawatankuasa Perundingan Pekerja</i>; Date: 29/12/2020; Venue: Moynod Estate Office</li> <li>- Sg. Sapi Estate Employee Consultative Committee Meeting; Date: 10/3/2021; Venue: Sg. Sapi Estate Office</li> <li>- Sg. Sapi Estate Joint Consultative Committee Meeting # 1/2021; Date: 10/3/2021</li> </ul>	
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>Based on the interview conducted with the workers' representatives and records of JCC election at all operating units within Ladang Sabah, it was confirmed that management does not interfere with the formation or operation of the workers committee.</p>	Complied
<p><b>Criterion 6.4</b>  Children are not employed or exploited.</p>			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>IOI Group has developed and implemented Sustainability Palm Oil Policy dated March 2018 where the company eliminates child labour in the company. Reviewed of the name list of workers found that the workers recruited with minimum age of 18 years old.</p> <p>Latest policy briefing was conducted during internal stakeholder meeting at respective units as following:</p> <ul style="list-style-type: none"> <li>- Ladang Sabah POM workers; Date: 13/11/2020</li> <li>- Luangmanis Estate workers; Date: 18/12/2020</li> <li>- Moynod Estate workers; Date: 15/6/2020</li> <li>- Sg. Sapi Estate workers; Date: 25/1/2021</li> </ul>	Complied

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		<p>Consultation meeting scheduled with external stakeholders were cancelled for 2020 due to COVID-19 pandemic and replace with indirect consultation through letters and email attached with public documents including relevant sustainability policies and procedures. Policy also available in company's website:</p> <p><a href="https://www.ioigroup.com/Content/S/pdf/Sustainable%20Palm%20Oil%20Policy.pdf">https://www.ioigroup.com/Content/S/pdf/Sustainable%20Palm%20Oil%20Policy.pdf</a></p>	
6.4.2	<p><b>(C)</b> 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>All the workers have their own individual file namely 'Employee Identification cum Input Document' where the evidence of date of birth include the passport detail available.</p>	Complied
6.4.3	<p><b>(C)</b> 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>As per worker's name list, all the workers are more than 18 years hired in Ladang Sabah certification unit. It was further verified with the stakeholders (school teacher, villagers, contractors, etc.) and workers during interview session.</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>Interview conducted on-site with sampled internal and external stakeholders confirmed that the information on no child labour policy and the negative effects of child labour were provided in appropriate languages and accessible to them. Records of communication also available as per sample sighted for hardware supplier of Ladang Sabah Estate i.e. Chuan Yee Hardwares Sdn. Bhd./Kebaco Sdn. Bhd. that was signed on 1/6/2020.</p>	Complied
<p><b>Criterion 6.5</b></p> <p>There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p><b>(C)</b> 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>The company has implemented Policy on Harassment at Workplace dated June 218 where the company is committed to promote a safe and healthy working environment. The company has zero tolerance</p>	Complied

	<p>- Critical (Major) compliance -</p>	<p>for any form of harassment at workplace. The policy serves as a guidance on handling matters related to harassment.          Latest policy briefing was conducted during internal stakeholder meeting at respective units as following:</p> <ul style="list-style-type: none"> <li>- Ladang Sabah POM workers; Date: 13/11/2020</li> <li>- Luangmanis Estate workers; Date: 18/12/2020</li> <li>- Moynod Estate workers; Date: 15/6/2020</li> <li>- Sg. Sapi Estate workers; Date: 25/1/2021</li> </ul> <p>Interview conducted with internal stakeholders among both local and foreign workers mainly women confirmed that they aware of their reproductive rights and understand how to respond to sexual harassment and/or violence in case of any. So far none happen.</p>	
<p>6.5.2</p>	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.          - Critical (Major) compliance -</p>	<p>The company has implemented IOI Group Sustainable Palm Oil Policy dated October 2020, mentioned that the will protect reproductive health of women employees and promote women empowerment.          Latest policy briefing was conducted during internal stakeholder meeting at respective units as following:</p> <ul style="list-style-type: none"> <li>- Ladang Sabah POM workers; Date: 13/11/2020</li> <li>- Luangmanis Estate workers; Date: 18/12/2020</li> <li>- Moynod Estate workers; Date: 15/6/2020</li> <li>- Sg. Sapi Estate workers; Date: 25/1/2021</li> </ul> <p>Interview conducted with internal stakeholders among both local and foreign workers mainly women confirmed that they aware of their reproductive rights.</p>	<p>Complied</p>

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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>New mothers' assessment was undertaken by gender committee representatives as per sample records of gender committee meeting conducted as following:</p> <ul style="list-style-type: none"> <li>- Women &amp; Empowerment Committee (WEC) Minutes of Meeting Sg. Sapi Estate; Date: 21/12/2020; Venue: Sg. Sapi Estate Office</li> <li>- Ladang Sabah Palm Oil Mill Minutes of Meeting Women &amp; Empowerment Committee # 2/2020; Date: 17/7/2020</li> </ul>	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>Interview conducted on-site with sampled internal stakeholders among all workforce confirmed that the information on grievance mechanism, which respects anonymity and protects complainants where requested, is established and communicated to them.</p> <p>No grievance issues that requires the implementation of the mechanism occurs in all operating units within Ladang Sabah certification unit since the last audit.</p>	Complied
<p><b>Criterion 6.6</b>            No forms of forced or trafficked labour are used.</p>			
6.6.1	<p><b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees.</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> </ul>	<p>It was well mentioned in the IOI Group Sustainability Palm Oil Policy dated October 2020 that:</p> <ol style="list-style-type: none"> <li>1. Company will eliminate all forms of illegal, forced, bonded, compulsory or child labour and in particular, follow responsible recruitment practices including not charging recruitment related fees at any stage in the recruitment process whether by us, our contractors, our agents or their sub-agents in receiving and sending countries.</li> <li>2. No retention of worker's passport/identity documents or withholding of workers' wages other than that prescribed by law.</li> </ol>	Complied

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	<ul style="list-style-type: none"> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p>	Interview conducted with internal stakeholders among both local and foreign workers confirmed that the company don't force them to work and all foreign workers are legal.	
6.6.2	<p><b>(C)</b> 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>There were Indonesian and Philippine workers hired in Ladang Sabah Certification Unit.</p> <p>IOI Group has developed Sustainable Palm Oil Policy dated October 2020 and Foreign Workers Recruitment Guideline &amp; Procedure in Malaysia revised on July 2018 where the company has provided induction and orientation training to the workers on the employment contract, wages, benefits such as medical leave and overtime, rules and regulation, safety training and Malaysia's culture. Besides, the company provide fair and equal employment opportunities to all workers and provide decent living condition.</p>	Complied
<p><b>Criterion 6.7</b></p> <p>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><b>(C)</b> The responsible person(s) for H&amp;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 respective Operating Units have appointed their Assistant Manager as the person in charge for safety and environment. The PIC role covers areas of responsibilities on safety, health and welfare of the staff/workers. The Mill and Estates Managers in turn were appointed as the Chairman for the OSH committee. His duties among others was to preside the OSH meetings, discharge the General Duties of Employers and make decision arising out of issues discussed for improvement of Safety, Health, Welfare and the Environment. OSH Committee has been formed consisting of representatives from the management and workers.</p> <p>Regular OSH Meetings were conducted by the respective units. Records of OSH Meeting Minutes was available for verification</p>	Complied

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		<p>during the assessment. The sampled OSH Meeting Minutes were as below;</p> <ol style="list-style-type: none"> <li>1. Ladang Sabah POM <ul style="list-style-type: none"> <li>• 21/03/2020 (1-2020), 03/07/2020 (2-2020), 25/09/2020 (3-2020), 11/12/2020 (4-2020)</li> </ul> </li> <li>2. Luangmanis Estate <ul style="list-style-type: none"> <li>• 24/01/2020 (1-2020), 25/04/2020 (2-2020), 23/07/2020 (3-2020), 09/12/2020 (4-2020)</li> </ul> </li> <li>3. Moynod Estate <ul style="list-style-type: none"> <li>• 12/05/2020 (01-2020), 14/07/2020 (01-2020), 18/09/2020 (03-2020), 11/12/2020 (04-2020)</li> </ul> </li> <li>4. Sungai Sapi Estate <ul style="list-style-type: none"> <li>• 10/03/2020 (01-2020), 02/2020 (02-2020), 09/09/2020 (03-2020), 11/12/2020 (04-2020)</li> </ul> </li> </ol>	
<p>6.7.2</p>	<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>The Certification Unit continued to use established procedures contained in their OHS Manual (a) 3.4.2 Accident/Incident Investigation &amp; Reporting and (b) 3.3.4.3 Emergency Prevention, Preparedness and Response. The procedures have been summarized in a flow chart form and displayed at notice boards for mill and estates employees information. Likewise, the respective Operating Unit ERP organization chart and important telephone contact numbers have been established and displayed too. ERT members receive training and practice in emergency procedures. The Fire Extinguisher and Emergency Drills Training was conducted in the respective units as below:</p> <ol style="list-style-type: none"> <li>1. Ladang Sabah POM – 01/08/2020</li> <li>2. Moynod Estate – 09/09/2020</li> <li>3. Luangmanis Estate - 09/01/2020</li> </ol> <p>First aid kit inventory was available for each operating units. It was acknowledged that all required items were stated in the inventory</p>	<p>Complied</p>

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		<p>and does not contain consumable medicines or expired items. The first aid holder's summary list was also available to include all important operations and worksites. Monthly monitoring is conducted by the estate and the mill to ensure used items are replenished and the boxes are well maintained. First Aid &amp; CPR Training was conducted as below:</p> <ol style="list-style-type: none"> <li>1. Ladang Sabah POM – 14/11/2020</li> <li>2. Moynod Estate - 15/11/2020 &amp; 19/06/2020</li> </ol> <p>Records of all accidents are maintained and summarized in the relevant form and submitted to DOSH as per OSH NADOPOD Regulations 2004. Relevant JKPP 6, JKPP 7 and JKPP 8 for the year 2020 was available for verification. All major accidents are reviewed through an accident investigation and during the quarterly held OSH meetings. For the year 2020, Ladang Sabah POM recorded a total of 11 accident cases where 5 of them were non LTA cases. Another 2 cases of Hearing impairments due to noise was reported in the mill as well. Luangmanis Estate had reported 14 Accidents cases where all were LTA cases. Moynod Estate reported 5 accident cases where all were LTA cases.</p> <p>New emergency procedure establish by management was Recovery Movement Control Order For Covid-19 Outbreak Prevention (March 2021) as per letter IOI/SR/SPC/027/2021 dated 19/3/2021.</p>							
6.7.3	<p><b>(C)</b> 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>All workers at the mill and estates have been trained in safe work practices including use of PPE related to their job function. Sampling in Sg Sapi estate for P&amp;D sprayer :-</p> <table border="1" data-bbox="1137 1276 1928 1394"> <thead> <tr> <th>Type of PPE</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Respirator Cartridge</td> <td>24/3/2021</td> </tr> <tr> <td>Safety boots</td> <td>27/1/2021</td> </tr> </tbody> </table>	Type of PPE	Date	Respirator Cartridge	24/3/2021	Safety boots	27/1/2021	Complied
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		<table border="1" data-bbox="1137 363 1926 464"> <tr> <td>Apron</td> <td>16/2/2021</td> </tr> <tr> <td>Nitrile Gloves</td> <td>13/2/2021</td> </tr> <tr> <td>Cotton gloves</td> <td>13/2/2021</td> </tr> </table> <p>The Shower room and changeroom also available in sampling estate, the spraying and manuring worker also aware regarding to ensure change the cloth before going home and keep their PPE in closet that management have prepared.</p> <p>For Ladang Sabah POM, PPE issuance as per below:-</p> <table border="1" data-bbox="1137 722 1926 959"> <thead> <tr> <th>Type of PPE</th> <th>Date</th> <th>Work station</th> </tr> </thead> <tbody> <tr> <td>Safety Shoe</td> <td>8/12/2020</td> <td>Engine room</td> </tr> <tr> <td>Safety helmet</td> <td>14/1/2019</td> <td>Engine room</td> </tr> <tr> <td>Earmuff</td> <td>13/4/2020</td> <td>Engine room</td> </tr> <tr> <td>Visibility Vest</td> <td>29/12/2018</td> <td>Engine room</td> </tr> <tr> <td>Leather Glove</td> <td>23/5/2019</td> <td>Biogas</td> </tr> <tr> <td>Respirator</td> <td>18/2/2020</td> <td>Biogas</td> </tr> </tbody> </table> <p>The sanitation facilities was prepared by Ladang Sabah POM for Laboratory staff, workshop and others.</p>	Apron	16/2/2021	Nitrile Gloves	13/2/2021	Cotton gloves	13/2/2021	Type of PPE	Date	Work station	Safety Shoe	8/12/2020	Engine room	Safety helmet	14/1/2019	Engine room	Earmuff	13/4/2020	Engine room	Visibility Vest	29/12/2018	Engine room	Leather Glove	23/5/2019	Biogas	Respirator	18/2/2020	Biogas	
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Respirator	18/2/2020	Biogas																												
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>The coverage of insurance provision in accordance with Malaysia law through SOCSO contribution was insufficiently evident for the workers as following:</p> <p><u>Ladang Sabah Palm Oil Mill:</u></p> <ul style="list-style-type: none"> <li>Employee # 1SLS/IOI/0315/8987; Date joined 22/3/2015; for Month of March &amp; June 2020</li> <li>Employee # 1SLS/IOI/0317/8997; Date joined 6/3/2017; for Month of March &amp; June 2020</li> </ul>	Non-compliance																											



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		<p><u>Moynod Estate:</u></p> <ul style="list-style-type: none"> <li>Employee # 1SLS/IOI/1013/7544; Date joined 1/10/2013; for Month of March 2020</li> <li>Employee # 1SLS/IOI/1115/7568; Date joined 1/11/2015; for Month of March 2020</li> </ul> <p><b>Therefore a minor nonconformity was raised during Remote audit.</b></p> <p>In Moynod, There 2 cases of JKPP 6 issue. From the sampling accident on 8/9/2020 with 7 days MC the workers was provided with medical care. Workers also covered by SOCSO verified as per Borang 8A for Sept 2020.</p>																
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	<p>The occurrence of accidents recorded for YTD December 2020 is as shown below:</p> <table border="1" data-bbox="1137 823 1926 1074"> <thead> <tr> <th>Operating Unit</th> <th>Days Lost (LTA)</th> <th>Total Cases</th> </tr> </thead> <tbody> <tr> <td>Ladang Sabah POM</td> <td>15</td> <td>5</td> </tr> <tr> <td>Luangmanis Estate</td> <td>117</td> <td>14</td> </tr> <tr> <td>Moynod Estate</td> <td>22</td> <td>5</td> </tr> <tr> <td>Sg Sapi Estate</td> <td>76</td> <td>9</td> </tr> </tbody> </table>	Operating Unit	Days Lost (LTA)	Total Cases	Ladang Sabah POM	15	5	Luangmanis Estate	117	14	Moynod Estate	22	5	Sg Sapi Estate	76	9	Complied
Operating Unit	Days Lost (LTA)	Total Cases																
Ladang Sabah POM	15	5																
Luangmanis Estate	117	14																
Moynod Estate	22	5																
Sg Sapi Estate	76	9																
<b>Principle 7: Protect, conserve and enhance ecosystems and the environment</b>																		
<p><b>Criterion 7.1</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>																		
7.1.1	<b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.	The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rats among	Complied															

	<p>- Critical (Major) compliance -</p>	<p>others. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Census records show that there was minimal outbreak of leaf eating pest. Although there have been minimal outbreaks of leaf eating pests, beneficial plants are being established to attract natural predators and further reduce the outbreak. Records show that the estates have planted beneficial plants such as 60% of <i>Cassia cobanensis</i>, 20% of <i>Turnera subulata</i> and 20% of <i>Antigonon leptopus</i>. Sampling implementation of IPM plan as per verification in Sg Sapi estate for year 2020. The actual planting as per below:-</p> <table border="1" data-bbox="1137 751 1928 981"> <thead> <tr> <th>Field</th> <th>Cassia Cobanensis</th> <th>Tunera Subulata</th> <th>Antigonan leptopus</th> </tr> </thead> <tbody> <tr> <td>95A</td> <td>70m</td> <td>26m</td> <td>26m</td> </tr> <tr> <td>95C</td> <td>66m</td> <td>22m</td> <td>22m</td> </tr> <tr> <td>96B</td> <td>24m</td> <td>8m</td> <td>8m</td> </tr> </tbody> </table>	Field	Cassia Cobanensis	Tunera Subulata	Antigonan leptopus	95A	70m	26m	26m	95C	66m	22m	22m	96B	24m	8m	8m	
Field	Cassia Cobanensis	Tunera Subulata	Antigonan leptopus																
95A	70m	26m	26m																
95C	66m	22m	22m																
96B	24m	8m	8m																
7.1.2	<p>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.</p> <p>- Minor compliance -</p>	<p>There are no species under the Global Invasive Database and CABI.org within the estate and mill premises.</p>	Complied																
7.1.3	<p>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.</p> <p>- Minor compliance -</p>	<p>During site verification at Moynod estate on field P20A (36 ha) no trace of fire been used. As per Census record on 8/23/2021 no critical disease in Moynod estate therefore no use fire for pest control been using in estate.</p>	Complied																
<p><b>Criterion 7.2</b>  Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>																			

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<p>7.2.1</p>	<p><b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>Justification of pesticides applied is available in the Agricultural Policies, Section 6.0: Weeding – Weed Control and Section 9.0: Pest and Disease. The use of pesticide is specific to the targeted pest, weed and disease. Justification takes consideration to minimize effect on non-target species. Chemicals allowed use in estate is available dated 28/2/2021. It include Glyphosate, Metsulfuron methyl, Triclopyr, Fluoxypyr 1 –methyl, Brodifacoum, Propineb, cypermetrin and Diuron.</p> <p>In addition to the above, IOI Group Sustainable Palm Oil Policy, jointly signed by Group CEO and Group Head of Sustainability, 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.</p> <p>The use of other Class 1 Chemicals (such as metamidophos and monocrotophos) approved by the Pesticides Board and included in the MPOB list of approved Pesticide for use in oil palm plantations can only be carried out under strict supervision and in absolutely necessary circumstances such as severe outbreak and critical pest infestation, and, with special method of application specified in the Highly Toxic Pesticides Regulation 1996 of the Pesticides Act 1974, after authorization has been received from relevant authorities.</p>	<p>Complied</p>												
<p>7.2.2</p>	<p><b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- 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 for the last two financial years.</p> <table border="1" data-bbox="1137 1219 1930 1321"> <thead> <tr> <th>Year</th> <th>Moynod</th> <th>Sg Sapi</th> <th>Luang Manis</th> </tr> </thead> <tbody> <tr> <td>2018/19</td> <td>1.469</td> <td>2.54</td> <td>2.124</td> </tr> <tr> <td>2019/20</td> <td>0.4776</td> <td>1.746</td> <td></td> </tr> </tbody> </table>	Year	Moynod	Sg Sapi	Luang Manis	2018/19	1.469	2.54	2.124	2019/20	0.4776	1.746		<p>Complied</p>
Year	Moynod	Sg Sapi	Luang Manis												
2018/19	1.469	2.54	2.124												
2019/20	0.4776	1.746													

7.2.3	<p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The IPM implementations described in Indicator 7.1.1 are meant to minimize the use of pesticides. The management encourage establishing biological control as per IPM plan. The implementation in the field is consistent with the IOI Group SOP. Sampling in Sg Sapi estate, the census was done to look for acceptance of replacement round for Arakus (Rat Baiting) dated latest on 14/12/2020 in field 95C and 96B.</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>Not applicable because 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>7.2.5a Judgment of the threat and verify why this is a major threat</p> <p>7.2.5b Why there is no other alternative which can be used</p> <p>7.2.5c Which process was applied to verify why there is no other less hazardous alternative</p> <p>7.2.5d What is the process to limit the negative impacts of the application</p> <p>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</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 dated 01/01/2021 at these estates showed that only class II, III &amp; IV chemicals were used. There were no Class 1A and Class 1B agrochemicals used. Paraquat was eliminated totally. In its place, alternatives such as Glyphosate were used instead.</p> <p>As per Chemical register in Luang Manis estate dated 28/2/2021, no chemical under class 1A or 1B or that listed by the Stockholm or Rotterdam Conventions, and paraquat.</p>	Complied
7.2.6	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are</p>	<p>Pesticides were handled, used or applied by trained workers in accordance with the product label. In addition to the product label, Safety Data Sheets were used and explained to the participants with</p>	Complied

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	<p>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.</p> <p>- Critical (Major) compliance -</p>	<p>emphasis on PPE, health and environmental risks of pesticide exposure; recognition of acute and long-term exposure; ways to minimize exposure to workers and their families; and international and national instruments or regulations that protect workers' health.</p> <p>Training for pesticides handler are as shown in the table below:</p> <p>Sungai Sapi Estate</p> <ul style="list-style-type: none"> <li>• Sprayers Safe Operating Procedures Training – 11/12/2020</li> <li>• Storekeeper Training – 21/08/2020</li> <li>• Chemical Mixer Training – 15/12/2020</li> </ul> <p>Moynod Estate</p> <ul style="list-style-type: none"> <li>• Chemical Premixer Training – 17/11/2020</li> <li>• Spraying, PPE &amp; Triple Rinsing Training – 15/10/2020</li> <li>• Buffer Zone Training – Sprayer and Manurer – 13/05/2020</li> </ul> <p>Luangmanis Estate</p> <ul style="list-style-type: none"> <li>• P&amp;D and SDS Training – 10/12/2020</li> <li>• Sprayers and SDS Training - 19/11/2020</li> </ul>	
7.2.7	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>At estates assessed the storage of pesticides was in accordance with the Occupational Safety and Health Act 1994 (Act 514), Regulations and Orders and Pesticides Act 1974 (Act 149) and 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 made available at the chemical store and explained to the workers by Management. Chemical stores inspection noted the following being practiced:</p> <ul style="list-style-type: none"> <li>• All stores were secured under lock and key with only</li> </ul>	Complied

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		<p>authorized personnel access.</p> <ul style="list-style-type: none"> <li>• Availability of Safety Data Sheet in store.</li> <li>• Provision of ventilation fan.</li> <li>• Display of Safety Pictorial poster, namely the required PPE and chemical Safety Hazards Pictogram.</li> <li>• Pesticides were separated by class.</li> <li>• Daily balance of remaining solution after completing pre-mixing were recorded, placed in secondary tray spill containment, and kept in the store under lock and key.</li> <li>• Concrete cemented floor, bund wall and provision of sump pond.</li> </ul>	
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 in Sg Sapi estate were triple rinsed, its bottom perforated to render it useless, inventoried and stored. This empty chemical container was been store at Ladang Sabah POM and disposed as scheduled waste SW 409. Ladang Sabah POM was the centralize for SW collection before disposal. Latest storage was on 15/3/2021 with total 240kg (Ref weighbridge ticket: SC21000017).</p>	Complied
7.2.9	<p><b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>There was no aerial spraying noted in all estates assessed.</p>	Complied
7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Following the CHRA conducted at each Operating Unit Annual medical surveillance has been carried out for all pesticide operators at the said estates as recommended by the CHRA Assessor. Medical surveillance record of those operators was examined and all of them were certified fit with no detrimental to health by registered Occupational Health Doctor, HQ/19/DOC/00/00399 from</p>	Complied

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		<p>DAB OH Sdn Bhd. See table below date of test, number and category of employees examined and their test findings.</p> <table border="1"> <thead> <tr> <th>Operating Unit</th> <th>Date of assessment</th> <th>No employee</th> <th>Results</th> </tr> </thead> <tbody> <tr> <td>Sg Sapi</td> <td>11/1/2021</td> <td>18</td> <td>Fit</td> </tr> <tr> <td>Ladang Sabah POM</td> <td>29/7/2020</td> <td>85</td> <td>Fit</td> </tr> <tr> <td>Luang Manis estate</td> <td>11/1/2021</td> <td>32</td> <td>Fit</td> </tr> </tbody> </table>	Operating Unit	Date of assessment	No employee	Results	Sg Sapi	11/1/2021	18	Fit	Ladang Sabah POM	29/7/2020	85	Fit	Luang Manis estate	11/1/2021	32	Fit	
Operating Unit	Date of assessment	No employee	Results																
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Ladang Sabah POM	29/7/2020	85	Fit																
Luang Manis estate	11/1/2021	32	Fit																
7.2.11	<p><b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>Pregnant and breast-feeding women, under-age person and other people that have medical restrictions working with pesticides are strictly prohibited to work with pesticides. Noted, there were women working as sprayers. Verified that the female workers were checked for pregnancy test at three-month interval by the on-site Estate Hospital Assistant. All results showed negative findings. Also, verified master list of workers and interview with management and workers found no record of workers under the of 18 in all estate.</p>	Complied																
<p><b>Criterion 7.3</b>  Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>																			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Wastes management plan is documented and incorporated with internal Environmental Impact Assessment. Among the wastes identified are:</p> <ol style="list-style-type: none"> <li>1. Scheduled wastes &amp; empty chemical containers</li> <li>2. Clinical wastes</li> <li>3. Domestic &amp; recyclable wastes, sewage and garden residue</li> <li>4. Scrap iron</li> </ol>	Complied																

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<p>7.3.2</p>	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Ladang Sabah POM act as collection centre for all operating units in Ladang Sabah Complex as per approval letter with ref. no. ASSH(B)91/110/619/001 Jld 22 (85) dated 23/01/2018. All estate submitted the inventory reports to Ladang Sabah POM who reported to DOE through ESWIS. Reviewed the inventory record for month of January and February 2021. Latest disposal was conducted on 23/01/2021 disposal records as follows:</p> <table border="1" data-bbox="1137 603 1825 1152"> <thead> <tr> <th>No.</th> <th>Waste Code</th> <th>Consignment Note No.</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>SW 417</td> <td>2021020218ER0B1I</td> </tr> <tr> <td>2.</td> <td>SW 409</td> <td>2021020218EOBT4Y</td> </tr> <tr> <td>3.</td> <td>SW 409</td> <td>2021020218DSWO2U</td> </tr> <tr> <td>4.</td> <td>SW 410</td> <td>20210202189H3JLC</td> </tr> <tr> <td>5.</td> <td>SW 104</td> <td>2021020217VOLQ43</td> </tr> <tr> <td>6.</td> <td>SW 109</td> <td>2021020217JT8YPK</td> </tr> <tr> <td>7.</td> <td>SW 102</td> <td>20210202174PZW56</td> </tr> <tr> <td>8.</td> <td>SW 305</td> <td>2021020218YT9COV</td> </tr> <tr> <td>9.</td> <td>SW 429</td> <td>2021020218O3XGJ5</td> </tr> <tr> <td>10.</td> <td>SW 306</td> <td>2021020218V1LU7J</td> </tr> </tbody> </table> <p>Ladang Sabah POM</p> <ol style="list-style-type: none"> <li>The mill disposed the scrap iron through appointed contractors by the HQ as per Payment Voucher dated 01/09/2020, 13/07/2020 and 08/07/2020</li> </ol>	No.	Waste Code	Consignment Note No.	1.	SW 417	2021020218ER0B1I	2.	SW 409	2021020218EOBT4Y	3.	SW 409	2021020218DSWO2U	4.	SW 410	20210202189H3JLC	5.	SW 104	2021020217VOLQ43	6.	SW 109	2021020217JT8YPK	7.	SW 102	20210202174PZW56	8.	SW 305	2021020218YT9COV	9.	SW 429	2021020218O3XGJ5	10.	SW 306	2021020218V1LU7J	<p>Complied</p>
No.	Waste Code	Consignment Note No.																																		
1.	SW 417	2021020218ER0B1I																																		
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6.	SW 109	2021020217JT8YPK																																		
7.	SW 102	20210202174PZW56																																		
8.	SW 305	2021020218YT9COV																																		
9.	SW 429	2021020218O3XGJ5																																		
10.	SW 306	2021020218V1LU7J																																		



		<p>2. The mill monitored the inventory for all scheduled waste generated by the mill and received from group estate and reported to DOE through ESWISS. Reviewed the Fifth Scheduled for the month of January and February 2021.</p> <p>3. Domestic waste was collected twice a week and disposed at designated landfill located in Moynod Estate. Reviewed the collection records as per weighbridge ticket no. DO21000009 dated 01/02/2021 and DO21000016 dated 25/02/2021.</p> <p>Moynod Estate</p> <p>1. The estate monitor the inventory of scheduled waste on monthly basis and submitted to Ladang Sabah POM. Reviewed the inventory records for the month of February 2020 as per scheduled 5 dated 27/02/2021.</p> <p>2. Scheduled waste generated in the estate were send to collection centre at Ladang Sabah POM. Reviewed the transportation records as per weighbridge ticket no. SC21000020 and SC21000018 dated 15/03/2021.</p> <p>3. The estate monitor the collection and disposal of recycle waste items. Reviewed the recycle waste generated from January 2020 till 24/03/2021 recorded at 1t 170 kg and disposal records as per official receipt no. 11951 dated 24/03/2021.</p> <p>4. The domestic waste collection was collected once a week. Sighted the landfill located in field P98B. No evidence of scheduled waste disposed in the landfill.</p> <p>Sg. Sapi Estate</p>	
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		<ol style="list-style-type: none"> <li>1. Scheduled waste generated in the estate were send to collection centre at Ladang Sabah POM. Reviewed the transportation records as per weighbridge ticket no. SC21000017 and SC21000016 dated 15/03/2021.</li> <li>2. The estate monitor the inventory for scheduled waste generated recorded in Monthly Scheduled Waste Inventory form. Reviewed the monitoring record for SW 102, SW 104, SW 109, SW 305 and 409 for the month of March 2021.</li> <li>3. Domestic waste was collected twice a week and disposed in designated landfill located in P96B. Sighted the landfill with only domestic waste disposed in it. No evidence of scheduled waste and recycled waste was disposed in the landfill.</li> </ol> <p>Lungmanis Estate</p> <ol style="list-style-type: none"> <li>1. Scheduled waste generated in the estate were send to collection centre at Ladang Sabah POM. Reviewed the transportation records as per weighbridge ticket no. SC21000027, SC21000025 and SC21000028 dated 16/03/2021.</li> <li>2. The estate disposed recycled waste through licensed recycler as reviewed official receipt no. 11940 dated 23/03/2021             <ol style="list-style-type: none"> <li>a. Domestic waste was collected twice a week and disposed in designated landfill located in P95A. Sighted the landfill with only domestic waste disposed in it. No evidence of scheduled waste and recycled waste was disposed in the landfill. Reviewed the collection records dated 31/03/2021, 29/03/2021 and 27/03/2021.</li> </ol> </li> </ol>	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	No evidence of fire use for waste disposal. The estate disposed the domestic waste in designated landfill.	Complied

<b>Criterion 7.4</b>			
Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>IOI group has established Standard Operation Procedure (StOP) to manage soil fertility. The StOP was revised in March 2020. Among the StOP as follows:</p> <p>Manuring</p> <ol style="list-style-type: none"> <li>1. Leguminous Cover Plant Manuring, document ref. no. IOI/SOP/A/08</li> <li>2. Manual Fertiliser Application for immature and mature palm, document ref. no. IOI/SOP/A/09</li> <li>3. Wheelbarrow fertiliser application for immature and mature palm, document ref. no. IOI/SOP/A/10</li> <li>4. Buffalo assisted Manuring for immature and mature palm, document ref. no. IOI/SOP/A/11</li> <li>5. Semi mechanised manuring for mature palm, document ref. no. IOI/SOP/A/12</li> <li>6. Empty fruit bunch (EFB) Mulching, document ref. no. IOI/SOP/A/13</li> <li>7. Palm Oil Mill Effluent (POME) Application, document ref. no. IOI/SOP/A/14</li> <li>8. Fertiliser Sampling for Analysis, document ref. no. IOI/SOP/A/15</li> <li>9. Planning and Organisation of fertiliser application, document ref. no. IOI/SOP/A/16</li> </ol>	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>IOI group has established Standard Operation Procedure (StOP) for foliar and soil sampling. The StOP was revised in March 2020. Among the StOP as follows:</p> <p>Foliar Sampling and Soil Sampling</p> <ol style="list-style-type: none"> <li>1. Foliar Analysis document ref. no. IOI/SOP/A/41</li> <li>2. Soil Analysis document ref. no. IOI/SOP/A/42</li> </ol> <p>In the StOP stated that both foliar sampling and soil sampling to be conducted annually.</p> <p>Moynod Estate</p> <p>Latest leaf sampling was conducted in April 2020 as per Leaf Nutrient Status Oil Palm dated 13/02/2021.</p> <p>Latest Soil Sampling was conducted in January 2021 as per Soil Analysis Result dated 25/03/2021</p> <p>Sg. Sapi Estate</p> <p>Latest leaf sampling was conducted in September 2020 as per Leaf Nutrient Status Oil Palm dated 03/02/2021.</p> <p>Latest Soil Sampling was conducted in November 2020 as per Soil Analysis Result dated 05/02/2021.</p> <p>Luangmanis Estate</p> <p>Latest leaf sampling was conducted in May 2020 as per Leaf Nutrient Status Oil Palm dated 26/01/2021.</p>	<p>Complied</p>
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		Latest Soil Sampling was conducted in February 2020 as per Soil Analysis Result dated 26/01/2021.																									
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>IOI group has established Standard Operation Procedure (StOP) to manage soil fertility. The StOP was revised in March 2020. Among the StOP as follows:</p> <p>Manuring</p> <ol style="list-style-type: none"> <li>1. Empty fruit bunch (EFB) Mulching, document ref. no. IOI/SOP/A/13</li> <li>2. Palm Oil Mill Effluent (POME) Application, document ref. no. IOI/SOP/A/14</li> </ol> <p>Reviewed the application records as follow:</p> <table border="1"> <thead> <tr> <th rowspan="2">Estate</th> <th colspan="2">EFB (MT)</th> <th colspan="2">POME (MT)</th> </tr> <tr> <th>January 2021</th> <th>February 2021</th> <th>January 2021</th> <th>February 2021</th> </tr> </thead> <tbody> <tr> <td>Moynod</td> <td>395.64</td> <td>198.04</td> <td>606.36</td> <td>576.26</td> </tr> <tr> <td>Sg. Sapi</td> <td>386.28</td> <td>92.72</td> <td>0.00</td> <td>336.95</td> </tr> <tr> <td>Luang Manis</td> <td>21.89</td> <td>80.13</td> <td>0.00</td> <td>0.00</td> </tr> </tbody> </table> <p>The EFB application was conducted as per StOP established or request by estate or recommendation by agronomist.</p>	Estate	EFB (MT)		POME (MT)		January 2021	February 2021	January 2021	February 2021	Moynod	395.64	198.04	606.36	576.26	Sg. Sapi	386.28	92.72	0.00	336.95	Luang Manis	21.89	80.13	0.00	0.00	Complied
Estate	EFB (MT)			POME (MT)																							
	January 2021	February 2021	January 2021	February 2021																							
Moynod	395.64	198.04	606.36	576.26																							
Sg. Sapi	386.28	92.72	0.00	336.95																							
Luang Manis	21.89	80.13	0.00	0.00																							
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Fertiliser application was conducted as per StOP established and recommendation by the Agronomist.</p> <p>The estate maintained the fertiliser application records in Daily Cost Book.</p>	Complied																								

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		<p>Reviewed fertiliser application records as follows:</p> <ol style="list-style-type: none"> <li>1. Moynod Estate for field P17D and P18A applied from 11/03/2021 till 23/03/2021.</li> <li>2. Sg. Sapi Estate for field P95C and P96B applied from 08/08/2020 till 13/08/2020.</li> <li>3. Luangmanis Estate for field PR19BA applied from 15/03/2021 till 18/03/2021.</li> </ol> <p>The fertiliser application was monitored by the Agronomist during their visit and recorded in Fertiliser Application Observation Sheet. Reviewed visit records as follows:</p> <ol style="list-style-type: none"> <li>1. Fertiliser Application Observation Sheet dated 10/10/2020 in Moynod Estate</li> <li>2. Fertiliser Application Observation Sheet dated 08/08/2020 in Sg. Sapi Estate</li> <li>3. Fertiliser Application Observation Sheet dated 25/09/2020 in Lungmanis Estate</li> </ol>			
<p><b>Criterion 7.5</b> Practices minimise and control erosion and degradation of soils.</p>					
7.5.1	<p><b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -</p>	<p>Maps identifying marginal and fragile soil, including steep terrain were available for verification. They were prepared by IOI GIS Department, dated November 2020. Among the information available in the soil maps is landform, parent materials and main soil units. The information in the slope maps is among others the degree of slope and area covered (in %).</p> <p>Among the soil series identified in the estates visited such as</p> <table border="1" data-bbox="1137 1358 1910 1393"> <tr> <td>Moynod</td> <td>Rumidi, Kretam</td> </tr> </table>	Moynod	Rumidi, Kretam	Complied
Moynod	Rumidi, Kretam				

		Sg. Sapi	Weston, Kinabatangan, Rumidi, Kretam, Lokan	
		Luangmanis	Sook, Rumidi, Kretam, Bidu-Bidu	
7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance -	IOI Group has established Standard Operating Procedures for oil palm planting at permitted levels on sloping land documented in Group Standard Operating Procedures (StOPs) for Estate Operations under 2.0: Standard Procedure for Land Preparation for the New Planting and Replanting.  Sighted at the replanting area at the estates visited, no replanting was conducted at area more than 25°.  All steep area in estates visited were categorized under HCV Management Area. The estates visited has established management plan for HCV Management Area.		Complied
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	There was no new planting at the Ladang Sabah Certification Unit.		Complied
<b>Criterion 7.6</b>				
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.				
7.6.1	<b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	Management establish Group Standard Operating Procedures (StOPs) for estate Operations Master List dated September 2007 to ensure of long term suitability of land for Palm oil cultivation. This manual include planting density, land clearing and preparation, Leguminous cover plant, Manuring, weeding, Pest and disease and others.  No new planting in Sg Sapi estate as per verification. As per Soil analysis result in Sg. Sapi estate dated 5/2/2021 by IOI Research Centre, Sabah there are no fragile soil in estate. From the soil map dated 12/6/2018 prepared by GIS Department, the major soil series was Weston series and Rumidi series.		Complied

		In Luang Manis estate, the soil map prepared by GIS Department dated 23 Sept 2020. The major soil series in estate Kretam Series, Rumidi Series and Sook Series. No peats oil in estate.	
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	No new planting in Certification unit and no fragile soil in sampling estate.	Not Applicable
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	No new planting in sampling estate however the soil map was available for all estate, sampling in Luang Manis estate, the soil map prepared by GIS Department dated 23 Sept 2020. The major soil series in estate Kretam Series, Rumidi Series and Sook Series. No peats oil in estate.	Not Applicable
<b>Criterion 7.7</b>			
No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	No peat soil identified at all estates visited in the estate visited. Verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. <b>PROCEDURAL NOTE:</b> Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -	No peat soil identified at all estates visited in the estate visited. Verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.	Not Applicable
7.7.3	<b>(C)</b> Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	No peat soil identified at all estates visited in the estate visited. Verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.	Not Applicable



7.7.4	<p><b>(C)</b> 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 the estate visited. Verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Not Applicable
7.7.5	<p><b>(C)</b> 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 the estate visited. Verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Not Applicable
7.7.6	<p><b>(C)</b> 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 the estate visited. Verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Not Applicable
7.7.7	<p><b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p>	<p>No peat soil identified at all estates visited in the estate visited. Verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Not Applicable

		- Critical (Major) compliance -	
<b>Criterion 7.8</b>			
Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<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>7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>7.8.1b Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>Sustainability Department has established water management plan and reviewed on annually basis. Latest reviewed was conducted on 31/12/2021. The objectives of the plan were to conserve and to maintain the availability of surface and ground water through pollution prevention. It outlined the method to conserve and minimise pollution of water through implementation of various methods such as best practice of raw water &amp; effluent treatment, maintaining riparian zone, management of land irrigation, maintaining soft vegetation in the field, regular education to employees on conserving water and water pollution preventions.</p> <p>The operating units visited provide the workers with adequate clean water through treated water at water treatment plant. Drinking water analysis was conducted twice per year.</p> <p>Ladang Sabah POM          Latest drinking water analysis was conducted on 02/03/2021 as per certificate of analysis no. W210305-05B-0 dated 22/03/2021. The results of water analysis after treatment was found conform to National Standard for Drinking Water Quality.</p> <p>Moynod Estate          Latest drinking water analysis was conducted on 27/06/2020 as per certificate of analysis no. W200627-01B-0 dated 28/08/2020. The results of water analysis after treatment was found conform to National Standard for Drinking Water Quality except for Iron recorded at 0.461. Investigation was conducted and management plan has been included in the water management plan.</p>	Complied

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		<p>Sg. Sapi Estate</p> <p>Latest drinking water analysis was conducted on 15/07/2020 as per certificate of analysis no. W200715-05-0 dated 04/09/2020. The results of water analysis after treatment was found conform to National Standard for Drinking Water Quality.</p> <p>Luangmanis Estate</p> <p>Latest drinking water analysis was conducted on 09/06/2020 as per certificate of analysis no. W200609-03-0 and W200609-04-0 dated 14/07/2020. The results of water analysis after treatment was found not conform to National Standard for Drinking Water Quality as the results for Iron and Manganese was higher than DWQS. The estate has conducted investigation and action plan has been established and documented in Water Management Plan. Reviewed the implementation of the management plan as cleaning of clarifier tank conducted on 04/10/2020.</p>	
7.8.2	<p><b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>The estates visited has demarcated the riparian buffer zone with red colour ring at the palm trunk along the buffer zone. Signboard on prohibition of chemical application along the buffer zone was erected at the area.</p> <p>River water sampling was conducted once every 4 months as per Environmental Compliance Report for Ladang Sabah submitted to NREB. Refer report ref. no. KWEC-(EV)/M/20. Results for all estates visited conform to NWQSM Class IIB.</p> <p>Moynod Estate</p>	Complied

		<p>Sighted the buffer zone area at field P97S and P96B. No evidence of chemical application was sighted at the buffer zone. Noted during interview with sprayers' shows the understanding on prohibition of chemical application at the buffer zone is acceptable.</p> <p>Sg. Sapi Estate</p> <p>Sighted the buffer zone area at field PR19 and P97G. No evidence of chemical application was sighted at the buffer zone. Noted during interview with sprayers' shows the understanding on prohibition of chemical application at the buffer zone is acceptable.</p> <p>Luangmanis Estate</p> <p>Sighted the buffer zone area at field P96H and P96D for stream which flow to the main river of Sg. Monyet. No evidence of chemical application was sighted at the buffer zone.</p>	
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>The mill applies the biological system equipped with ponds in series for its treatment of effluent. The quality of discharged effluent was analysed every month and the parameters are T, pH, BOD, COD, TS, SS, O&amp;G, AN and TN. Based on the independent lab report, the mill has maintained below 20 ppm of BOD for the last 12 months.</p> <p>Mill effluent is treated through biological anaerobic treatment. Regular monitoring was conducted as per requirement. Monthly and quarterly report was submitted to DOE accordingly. reviewed the Quarterly Return Form to DOE FY 2020 as follows:</p> <p>4<sup>th</sup> quarter</p>	Complied

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Month	Parameter	Results
Oct 26/10/2020	BOD	16.00
	pH	8.70
Nov 12/11/2020	BOD	18.80
	pH	8.50
Dec 08/12/2020	BOD	14.10
	pH	8.60
3 <sup>rd</sup> quarter		
Month	Parameter	Results
Jul 10/07/2020	BOD	17.30
	pH	8.70
Aug 19/08/2020	BOD	13.80
	pH	8.80
Sep	BOD	19.70

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		08/09/2020	pH	8.60	
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	Mill has maintained monitoring of water usage for processing FFB which recorded every month. Water for processing is abstracted from water pond. The mill has recorded water consumption at 2.23 m <sup>3</sup> /mt FFB in the last FY July 2019-June 2020. As todate February 2021 for FY July 2020-June 2021, water consumption recorded at 2.42 m <sup>3</sup> /mt FFB.			Complied
<b>Criterion 7.9</b> 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 -	<p>Plan for improving efficiency of fossil fuel was spelt out in Environmental Impact Assessment, Management Action Plans &amp; CIP. Among the plans established by the operating units were:</p> <ul style="list-style-type: none"> <li>• avoid purchasing second grade diesel from unauthorized dealers that contain high Sulphur content</li> <li>• regular service of tractors for efficient running of engines</li> <li>• the usage of methane gas from POME instead of fossil fuel to generate electricity</li> </ul> <p>Monitoring of diesel fuel consumption was done by all the visited operating units. The data was then used for GHG calculating by using the RSPO GHG Calculator.</p> <p>The mill the fuel consumption on monthly basis. The mill has recorded diesel consumption at 3.98 m<sup>3</sup>/mt FFB in the last FY July 2019-June 2020. As todate February 2021 for FY July 2020-June 2021, water consumption recorded at 6.08 m<sup>3</sup>/mt FFB.</p>			Complied
<b>Criterion 7.10</b> Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.					

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7.10.1	<p><b>(C)</b> 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>Plan for improving efficiency of fossil fuel was spelt out in Environmental Impact Assessment, Management Action Plans &amp; CIP. Among the plans established by the operating units were:</p> <ul style="list-style-type: none"> <li>• avoid purchasing second grade diesel from unauthorized dealers that contain high Sulphur content</li> <li>• regular service of tractors for efficient running of engines</li> <li>• the usage of methane gas from POME instead of fossil fuel to generate electricity</li> </ul> <p>Monitoring of diesel fuel consumption was done by all the visited operating units. The data was then used for GHG calculating by using the RSPO GHG Calculator.</p>	Complied
7.10.2	<p><b>(C)</b> 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>An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent. The Identification of Potential Source of GHG Emission and GHG Reduction Plan is used to identify the waste products and sources of pollution is in place and is being reviewed accordingly. Among the Potential Source of GHG Emission identified such as Palm Oil Mill Effluent (POME), Diesel Usage, Electricity Usage, Chemical Usage and Generator Set.</p> <p>Monitoring of diesel fuel consumption was done by all the visited operating units. The data was then used for GHG calculating by using the RSPO GHG Calculator.</p>	Complied
7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>RSPO has made a compulsory for submitting GHG beginning 1/1/2017. Ladang Sabah Certification Unit had used RSPO Palm GHG v4.0 calculator as a tool. Records were maintained individually in the respective office.</p>	Complied

**Criterion 7.11**  
Fire is not used for preparing land and is prevented in the managed area

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7.11.1	<p><b>(C)</b> 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 and revised in March 2020. Refer doc. no. IOI/SOP/A/04.</p> <p>All felled palm will be shredded or chip and piled between planting rows.</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -</p>	<p>IOI group has established IOI Group Fire Management Guidelines. Refer document no. 101/G/EV/012, revision 0, issued on 08/01/2021 signed by the Plantation Director.</p> <p>The IOI Group IOI Group Fire Management Guidelines was categorized into 3 stages:</p> <ul style="list-style-type: none"> <li>• Stage 1: Prevention and Monitoring</li> <li>• Stage 2: Emergency Response</li> <li>• Stage 3: Post-Fire Analysis &amp; Programs</li> </ul> <p>The operating units subscribed the NASA Fire Information Resource Management System (FIRMS) to monitor the fire incident occurrence in the estate and surrounding areas.</p>	Complied
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p>	<p>The estates visited engagement with the adjacent stakeholders during stakeholders' consultation meeting.</p>	Non-compliance



	<p>- Minor compliance -</p>	<p>In the meeting, the estate brief the stakeholders on the IOI group policies, environmental and social issue.</p> <p>However, there is no evidence of the engagement on fire prevention and control measures with the adjacent stakeholders for Moynod Estate and Sg. Sapi Estate.</p> <p>Hence, a minor nonconformity has been raised on the matter.</p>	
<p><b>Criterion 7.12</b>  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.</p>			
<p>7.12.1</p>	<p><b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>Not applicable since there is no land clearing after November 2005. The HCV reassessment for Ladang Sabah Complex had been conducted internally where report entitled "High Conservation Value Assessment Management Action Plans &amp; Continuous Improvement Plans" dated January 2018 was prepared.</p>	<p>Not Applicable</p>
<p>7.12.2</p>	<p><b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>7.12.2b Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p>	<p>Not applicable since there is no land clearing after November 2005.</p> <p>The HCV reassessment for Ladang Sabah Complex had been conducted internally where report entitled "High Conservation Value Assessment Management Action Plans &amp; Continuous Improvement Plans" dated January 2018 was prepared. The assessment has also involved the relevant stakeholder such as the Sabah Forest Department and Sabah Wildlife Department. Based on the assessment, it has covered the certification unit's landscape level. Among the conservation identified includes natural waterways (river and tributaries), forest reserves (Luangmanis and Segaliud Lokan) and steep terrain areas.</p>	<p>Complied</p>

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	<p><b>PROCEDURAL NOTE:</b> Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>With regards to the HCV &amp; Conservation Area Management Action Plans &amp; Continuous Improvement Plan, each of the operating unit conduct their own review. All the visited estates reviewed their action plan accordingly and was available for verification. Among the action plans established were:</p> <ul style="list-style-type: none"> <li>• To provide riparian zone according to DID guideline</li> <li>• To promote natural vegetation to enhance soil stability</li> <li>• To avoid replanting within the riparian zones</li> <li>• To prevent illegal hunting or logging at the implantable areas (normally steep hill)</li> </ul> <p>Reviewed the implementation of the management plan as follows: Moynod Estate</p> <ol style="list-style-type: none"> <li>1. To ensure security issue, a gate pass for any visitor entering the estate and to check the vehicle to ensure no hunting gear was bought. Reviewed the "Akuan Penerimaan dan Pendedahan Pergerakan bukan Kakitangan/Pembekal/Kontraktor" dated 19/03/2021.</li> <li>2. IOI Group in collaboration with Sabah Wildlife Department has appointed personnel as Honorary Wildlife Warden as per Government Gazette no. 49: KPKAS: 500-14/2KII.2 (120) dated 07/03/2019. In Moynod Estate, the Field Supervisor was appointed as Wildlife Warden as per certificate reviewed and Authority Card reviewed. The validity from 18/02/2019 till 17/02/2022.</li> <li>3. The estate monitored the wildlife present in the estate. The monitoring is based on sightings and footprint. Reviewed the monitoring records for the month of December 2020</li> <li>4. The estate conducted HCV monitoring on weekly basis. Reviewed the monitoring records FY 2020.</li> </ol>	
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		<p>Sg. Sapi Estate</p> <ol style="list-style-type: none"> <li>1. The estate conducted monitoring for HCV and HCV Management Area on weekly basis. Reviewed the monitoring records dated 06/01/2021, 11/01/2021, 17/02/2021 and 24/02/2021.</li> <li>2. The estate submitted the monthly summary field patrolling report to SPO Department on monthly basis. Reviewed the report for the month of February dated 08/03/2021</li> </ol> <p>Luangmanis Estate</p> <ol style="list-style-type: none"> <li>1. The estate the conducted HCV and Conservation area monitoring on weekly basis. Reviewed the monitoring records dated 04/01/2021, 11/01/2021, 02/03/2021 and 09/03/2021.</li> <li>2. The estate has continuously create awareness among the employee. Latest training on HCV was conducted 02/08/2020. Signboard on prohibition of any activity in HCV area was erected as sighted the HCV area adjacent to Lungmanis Forest Reserve.</li> </ol>	
7.12.3	<i>Indicator is not applicable in Malaysia context</i>		
7.12.4	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	Not applicable since there is no land clearing after November 2005.	Not Applicable

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>	No new planting and land clearing since 15 November 2018.	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>Among RTE species identified in the external HCV 1 Luangmanis Forest Reserve, adjacent with Moynod Estate and Luangmanis Estate which protected under Protection of wildlife Act 1972 (Act 76), Sabah Wildlife Conservation and Enactment 1997 and IUCN Red List 2008 such as elephant, other wildlife animals as reported in High Conservation Value and Conservation Area dated January 2018 reviewed on 06/02/2021.</p> <p>Education programmes such as training/briefing and signage were given to the workforce. Records of trainings were maintained by the operating units for verification.</p> <p>IOI Group in collaboration with Sabah Wildlife Department has appointed personnel as Honorary Wildlife Warden as per Government Gazette no. 49: KPKAS: 500-14/2KII.2 (120) dated 07/03/2019. In Moynod Estate, the Field Supervisor was appointed as Wildlife Warden as per certificate reviewed and Authority Card reviewed. The validity from 18/02/2019 till 17/02/2022.</p> <p>The estate monitored the wildlife present in the estate. The monitoring is based on sightings and footprint. Reviewed the monitoring records for the month of December 2020</p> <p>The estate conducted HCV monitoring on weekly basis. Reviewed the monitoring records FY 2020.</p>	Complied

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7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. - Minor compliance -	No new planting and land clearing since 15 November 2018.	Not Applicable
7.12.8	<b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies. - Critical (Major) compliance -	No land clearing since without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018 within Ladang Sabah POM certification unit. Thus, this indicator is not available.	Not Applicable

**Appendix B: Approved Time Bound Plan**

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
1.	Pamol (Sabah) POM, Sabah	Meliau, Nangoh, Rungus, Tindakon, Ulu, Sugut & Bayok	May 2008	Re-Certified in November 2016	ASA-04 audit completed in July 2020	No outstanding issues
2.	Sakilan POM	Sakilan, Linbar 1 and Linbar 2	Nov 2008	Re-Certified in Mar 2020	ASA-01: 30 % remote audit completed in November 2020. Remaining 70% onsite audit will be conducted in January 2021.	No outstanding issues
3.	Pamol Kluang POM	Pamol Timur, Pamol Barat, Mamor, Unijaya, Kahang and Swee Lam	Mar 2009	Re-Certified in Apr 2020	ASA-01 audit completed in November 2020	No outstanding issues
4.	Gomali POM	Gomali, Paya Lang, Bahau, Bertam, Bukit Dinding, Kuala Jelai, Tambang, Regent, Sagil, and Jasin Lalang	Aug 2009	Re-Certified in Oct 2020	Recertification audit completed in July 2020	No outstanding issues
5.	Baturong POM	Baturong 1, Baturong 2, Baturong 3 and Cantawan	Sept 2009	Re-Certified in Oct 2020	Recertification audit completed in August 2020	No outstanding issues

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6.	Bukit Leelau POM	Bukit Leelau, Detas, Merchong, Mekassar, Leepang A and Laukin A	Apr 2010	Re-Certified in Nov 2015	Recertification audit completed in September 2020	No outstanding issues
7.	Mayvin POM	Mayvin 1, Mayvin 2, Mayvin 5, Mayvin 6 and Tangkulap	Aug 2010	Re-Certified in Dec 2015	Recertification audit completed in August 2020	No outstanding issues
8.	Pukin POM, Pahang	Pukin, Shahzan 1, Shahzan 2, Segamat and Bukit Serampang	Dec 2010	Re-certified in June 2016	ASA-04 audit completed in March 2020	No outstanding issues
9.	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-02 audit completed in September 2020	No outstanding issues.
10.	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-02 audit completed in January 2020.	No outstanding issues
11.	Ladang Sabah POM	Moynod, Luangmanis, Terusan Baru, Sungai Sapi, Laukin, Labuk, Bimbingan 1, and Bimbingan 2	Oct 2012	Re-certified in July 2018	ASA-02 audit completed in January 2020.	No outstanding issues
12.	Morisem POM, Sabah	Morisem 1, Morisem 2, Morisem 3, Morisem 4, Leepang	Sept 2013	Re-certified in December 2018	ASA-02: 30 % remote audit completed in	No outstanding issues

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		2, Leepang 3, and Leepang 4			November 2020. Remaining 70% onsite audit will be conducted in January 2021.	
13.	Unico POM-1, Sabah	Unico 6, Ladang Asas (Tas & Halusah), 31 (Outgrowers & Smallholders)	Planned - 2018	Certified in July 2018	ASA-02 audit completed in July 2020.	No outstanding issues Outgrowers and Smallholders are not part of the certified area
14.	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-02 audit completed in February 2020.	No outstanding issues Outgrowers and Smallholders are not part of the certified area
15.	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><b>Progress on Stage 2: Community Participatory Mapping</b></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 CICOM. By mid-March 2020, six out of nine affected communities had their surveys done. Unfortunately, at that point, the coronavirus outbreak reached Sarawak and the government issued Movement Control Order. The Community Participatory Mapping had to be put on hold.</p> <p>On 12 June 2020, CICOM resumed the Community Participatory Mapping process. Two of the remaining three communities yet to be mapped, Long Jegan and Long Teran Batu, had some reservations about their participation in the Community Participatory Mapping. To address their concerns, a team consisting of the State of Sarawak’s Ministry of Modernization of Agriculture, Native Land and Regional Development (MANRED), Land Custody and Development Authority (LCDA), District Office of Beluru, and IOI visited the two communities on July 20-21. As a result, Long Jegan and Long Teran Batu decided to</p>



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						<p>participate in the mapping exercise. The mapping of these two villages was completed on 29 July 2020.</p> <p>On 21 July 2020, the Penans of Long Lapok, which is another local community living outside the Provisional Lease area, submitted to IOI a request to include them in the Resolution Process. CICOM will, therefore, include this community in the mapping exercise to understand their land claims better. This will inevitably delay further the completion of the Community Participatory Mapping.</p> <p>CICOM managed to complete the initial mapping exercise in line with the deadline of 31 July 2020. However, when CICOM proceeded to socialization and verification of the maps with the affected communities, a group of 48 LTKA farmers suddenly came up with new land claims, which required CICOM to conduct further land surveys and thus delayed the process of the Community Participatory Mapping.</p> <p>On August 7th, the Berawan of Long Jegan sent a letter to the RSPO expressing their dissatisfaction with IOI Pelita and CICOM helping other communities with mapping their land claims without consultation with the leaders of Long Jegan who claim the entire area. IOI Pelita and the representatives of the State of Sarawak Government met on October 5th and obtained Long Jegan’s consent to continue their participation in the mapping process and delay the addressing of the overlapping land claims till the next stage of the resolution process, that is till Stage 3 – Negotiations for Final Dispute Settlement. The local authorities made it also clear that the intercommunal land disputes between various communities are beyond the control or authority of IOI Pelita and instead should be directed to their District Officer. During the meeting the elders of Long Jegan asked IOI Pelita and CICOM for help with additional mapping exercises. This will unfortunately further delay the completion of Stage 2 (Community Participatory Mapping). CICOM completed the Community Participatory Mapping and Stage 2 of the Resolution Process on 7 November 2020.</p> <p><b>Stage 3: Negotiations for Final Settlement</b></p> <p>Stage 3 is expected to start as early as 1 December 2020 providing that Covid-19-related movement restrictions are lifted. In the meantime, the communities will be able to prepare themselves for the negotiations and obtain any additional assistance they might need from CICOM.</p>

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						<p>The screenshot displays the RSPO Complaint System interface. At the top, it identifies the Respondent as IOI PELITA PLANTATION SDN BHD (a subsidiary of IOI Corporation Berhad) and the Complainant as Local Community of Long Teran Kanan &amp; NGO (Grassroots). Below this is a 'COMPLAINT PROGRESS' bar and a 'COMPLAINT BACKGROUND' section. The background section contains a table with the following data:</p> <table border="1"> <tr><td>Complaint Reference</td><td>N/A</td></tr> <tr><td>Status</td><td>Investigation</td></tr> <tr><td>Respondent</td><td>IOI PELITA PLANTATION SDN BHD (a subsidiary of IOI Corporation Berhad)</td></tr> <tr><td>Complainant</td><td>Local Community of Long Teran Kanan &amp; NGO (Grassroots)</td></tr> <tr><td>Date Complaints Submitted</td><td>15 Mar 2010</td></tr> <tr><td>Date Complaints Accepted</td><td>N/A</td></tr> <tr><td>Membership Sector</td><td>Processors and / or Traders</td></tr> <tr><td>Location of Complaint</td><td>Malaysia</td></tr> <tr><td>Region / District / Province</td><td>Miri, Sarawak</td></tr> <tr><td>Summary of the Complaint</td><td>Synopsis Land conflict IOI Group's certification process for new certifications suspended in 14/11. Both parties have agreed for mediation. Mediator has been engaged through the RSPO Dispute Settlement Facility. Mediation process Stage 1 began in September 2011 and is ongoing (note: Stage 1 is about Conflict assessment and Agreement to Participate in a Mediation. This stage would map the dispute through identifying the parties who should participate in the mediation and establish a primary agenda of issues that require resolution. It would also seek the commitment of the key parties to enter into a mediation, and establish their agreement to the mediation team). Updates of this case can be found in DSF <a href="#">list of disputes</a>.</td></tr> </table>	Complaint Reference	N/A	Status	Investigation	Respondent	IOI PELITA PLANTATION SDN BHD (a subsidiary of IOI Corporation Berhad)	Complainant	Local Community of Long Teran Kanan & NGO (Grassroots)	Date Complaints Submitted	15 Mar 2010	Date Complaints Accepted	N/A	Membership Sector	Processors and / or Traders	Location of Complaint	Malaysia	Region / District / Province	Miri, Sarawak	Summary of the Complaint	Synopsis Land conflict IOI Group's certification process for new certifications suspended in 14/11. Both parties have agreed for mediation. Mediator has been engaged through the RSPO Dispute Settlement Facility. Mediation process Stage 1 began in September 2011 and is ongoing (note: Stage 1 is about Conflict assessment and Agreement to Participate in a Mediation. This stage would map the dispute through identifying the parties who should participate in the mediation and establish a primary agenda of issues that require resolution. It would also seek the commitment of the key parties to enter into a mediation, and establish their agreement to the mediation team). Updates of this case can be found in DSF <a href="#">list of disputes</a> .
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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>28 Oct 2020</td> <td>Phase 2 of Resolution Plan ongoing.</td> <td></td> </tr> <tr> <td>23 Sep 2020</td> <td>Phase 2 of the Respondent's Resolution Plan is still in progress.</td> <td></td> </tr> <tr> <td>26 Aug 2020</td> <td>The mapping process for Stage 2 of the Resolution Plan has been completed. The CP has deliberated and instructed the Secretariat to seek further clarification from the Respondent on the next steps in the Resolution Plan including the potential risks which have been identified and the methods which are put into place to ensure momentum is maintained. The CP has also made certain recommendations for the Respondent's consideration in implementing the Resolution Plan.</td> <td></td> </tr> <tr> <td>29 Jul 2020</td> <td>The Resolution Plan has resumed and the Respondent aims to conclude the 2nd phase by the end of September 2020.</td> <td></td> </tr> <tr> <td>24 Jun 2020</td> <td>Draft email to Respondent submitted to CP for approval. Pending endorsement by all CP members.</td> <td></td> </tr> <tr> <td>20 May 2020</td> <td>Secretariat to prepare a draft email setting out the CP's concerns and for the CP's approval prior to release to the Respondent.</td> <td></td> </tr> <tr> <td>29 Apr 2020</td> <td>Respondent's resolution plan halted in light of the Movement Control Order imposed by the Government of Malaysia. The Secretariat is to write to the Respondent with the CP's concerns on certain observations made based on the Respondent's recent update.</td> <td></td> </tr> <tr> <td>25 Mar 2020</td> <td>Phase 2 of the Resolution Plan is still ongoing. Some activities have been halted due to the Movement Restriction Order imposed by the Malaysian Government. The CP has directed the Secretariat to write to IOI with certain queries for clarification.</td> <td></td> </tr> <tr> <td>26 Feb 2020</td> <td>Phase two of the Respondent's resolution process ongoing with only three more longhouses left for the participatory mapping process.</td> <td></td> </tr> <tr> <td>29 Jan 2020</td> <td>Phase 2 of the Respondent's Resolution Plan ongoing. Draft ToR for Phase 3 of Resolution Plan submitted to the CP for comments.</td> <td></td> </tr> </tbody> </table> <p>Further and updated progress of this issue could be access through the link below;</p> <ul style="list-style-type: none"> <li>(a) <a href="#">IOI Pelita Land Dispute Resolution Plan</a></li> <li>(b) <a href="#">Current progress on IOI Pelita Land Dispute Resolution Process</a></li> <li>(c) <a href="https://www.ioigroup.com/Content/MEDIA/M_Media?Category=7">https://www.ioigroup.com/Content/MEDIA/M_Media?Category=7</a></li> <li>(d) <a href="#">RSPO Case Tracker – IOI Pelita Status of Complaints</a></li> </ul> <p>Internal audit for Sejap Estate have been completed in November 2020.</p>	DATE	UPDATE	DOCUMENTS	28 Oct 2020	Phase 2 of Resolution Plan ongoing.		23 Sep 2020	Phase 2 of the Respondent's Resolution Plan is still in progress.		26 Aug 2020	The mapping process for Stage 2 of the Resolution Plan has been completed. The CP has deliberated and instructed the Secretariat to seek further clarification from the Respondent on the next steps in the Resolution Plan including the potential risks which have been identified and the methods which are put into place to ensure momentum is maintained. The CP has also made certain recommendations for the Respondent's consideration in implementing the Resolution Plan.		29 Jul 2020	The Resolution Plan has resumed and the Respondent aims to conclude the 2nd phase by the end of September 2020.		24 Jun 2020	Draft email to Respondent submitted to CP for approval. Pending endorsement by all CP members.		20 May 2020	Secretariat to prepare a draft email setting out the CP's concerns and for the CP's approval prior to release to the Respondent.		29 Apr 2020	Respondent's resolution plan halted in light of the Movement Control Order imposed by the Government of Malaysia. The Secretariat is to write to the Respondent with the CP's concerns on certain observations made based on the Respondent's recent update.		25 Mar 2020	Phase 2 of the Resolution Plan is still ongoing. Some activities have been halted due to the Movement Restriction Order imposed by the Malaysian Government. The CP has directed the Secretariat to write to IOI with certain queries for clarification.		26 Feb 2020	Phase two of the Respondent's resolution process ongoing with only three more longhouses left for the participatory mapping process.		29 Jan 2020	Phase 2 of the Respondent's Resolution Plan ongoing. Draft ToR for Phase 3 of Resolution Plan submitted to the CP for comments.	
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16.	PT SKS, Indonesia	SKS 1, SKS 2, and SKS 3	Planned - 2021	Uncertified Unit	RSPO Stage 1 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 15<sup>th</sup> 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 &amp; 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) <a href="#">RSPO Ketapang Complaint for PT BSS, PT SKS &amp; PT BNS</a></p> <p>(b) <a href="#">RSPO Case Tracker – PT BSS, PT SKS &amp; PT. BNS Status of Complaints</a></p>

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						<p>(c) <a href="#">RSPO Post-Complaints Monitoring</a></p> <p>RSPO / Investigation &amp; Monitoring Unit (IMU) / Monitoring / Post-Complaints Monitoring</p> <p><b>Post Complaints Monitoring</b></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-000882</td> <td>Closed</td> </tr> </tbody> </table>	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-000882	Closed
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						The Stage 1 of RSPO P&C audit was conducted on 9 <sup>th</sup> – 12 <sup>th</sup> September 2019 by BSI Due to the pandemic issue, certification preparation was affected such 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 have been communicated and approved by RSPO. In November 2020, PT. SKS internal audit have been conducted.
17.	PT BNS, Indonesia	BNS 1, BNS 2, BNS 3 and BNS 4	Planned - 2021	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 15<sup>th</sup> April 2019, RSPO's official announced "that the monitoring of the implementation of the Complaints Panel directives for "PT Sukses Karya Sawit (SKS), PT Berkas 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 &amp; 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) <a href="#">RSPO Ketapang Complaint for PT BSS, PT SKS &amp; PT BNS</a></p> <p>(b) <a href="#">RSPO Case Tracker – PT BSS, PT SKS &amp; PT. BNS Status of Complaints</a></p>

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19.	PT KPAM, Indonesia	Under Development	Planned - 2023	Uncertified Unit	NPP and HCSA was approved in April 2018. Currently under development.	<p>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:</p>  <p><a href="https://rspo.org/certification/new-planting-procedure/public-consultations/page/2?">https://rspo.org/certification/new-planting-procedure/public-consultations/page/2?</a></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:</p> <p><a href="http://highcarbonstock.org/wp-content/uploads/2018/05/PRR-PT.-KPAM.pdf">http://highcarbonstock.org/wp-content/uploads/2018/05/PRR-PT.-KPAM.pdf</a></p>

**Appendix C: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2020** for **Ladang Sabah POM** and supply base was calculated using the PalmGHG Calculator version 4.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2020** for **Ladang Sabah POM** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	0.92
PKO	0

Extraction	%
OER	22.12
KER	4.36

Production	t/yr
FFB Process	122,119.64
CPO Produced	27014.64
PKO Produced	5324.791

Land Use	Ha
OP Planted Area	16,202.00
OP Planted on peat	0
Conservation (forested)	48.59
Conservation (non-forested)	116.79
<b>Total</b>	<b>16,367.38</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	58291.86	0.48	0	0	0	0	58291.86	0.48
CO <sub>2</sub> Emission from fertilizer	14072.44	0.12	0	0	0	0	14072.44	0.12
NO <sub>2</sub> Emission	12372.14	0.10	0	0	0	0	12372.14	0.10
Fuel Consumption	1480.44	0.01	0	0	0	0	1480.44	0.01
Peat Oxidation	0	0	0	0	0	0	0	0
<b>Sink</b>								
Crop Sequestration	-55252.95	-0.45	0	0	0	0	-55252.95	-0.45
Conservation Sequestration	-445.57	-0.00	0	0	0	0	-445.57	-0.00
<b>Total</b>	<b>30518.36</b>	<b>0.25</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>30518.36</b>	<b>0.25</b>

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*\*Note: Includes both estates and smallholders*

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	0	0
Fuel Consumption	1911.66	0.02
Grid Electricity Utilization	0	0
<b>Credit</b>		
Export of Grid Electricity	0	0
Sales of PKS	-2563.57	-0.02
Sales of EFB	0	0
<b>Total</b>	<b>-651.91</b>	<b>-0.00</b>

**Summary of Kernel Crusher Emission and Credit (if applicable)**

Emissions	tCO <sub>2</sub> e
PK from own mill	0
PK from other source	0
Fuel Consumptions	0
<b>Total Crusher emissions</b>	<b>0</b>

\*This mill has no kernel crusher operation.

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

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

**Appendix D: Supply Chain Declaration**

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	Jan 2020	19,872.00	-	19,872.00
2	Feb 2020	21,489.02	-	21,489.02
3	Mar 2020	19,164.77	-	19,164.77
4	Apr 2020	24,972.39	-	24,972.39
5	May 2020	26,683.55	-	26,683.55
6	June 2020	25,549.00	-	25,549.00
7	July 2020	24,590.35	-	24,590.35
8	Aug 2020	23,462.37	-	23,462.37
9	Sept 2020	27,688.03	-	27,688.03
10	Oct 2020	28,379.57	-	28,379.57
11	Nov 2020	19,430.90	-	19,430.90
12	Dec 2020	18,829.98	-	18,829.98
13	Jan 2021	18,216.03	-	18,216.03
14	Feb 2021	20,681.74	-	20,681.74
15	Mar 2021	25,347.69	-	25,347.69
	<b>Total</b>	344,357.39	-	344,357.39

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Jan 2020	3,938.65	1,057.44
2	Feb 2020	4,427.67	1,187.19
3	Mar 2020	4,090.78	1,053.24
4	Apr 2020	5,327.90	1,428.38
5	May 2020	5,447.15	1,455.60
6	June 2020	5,686.81	1,616.68
7	July 2020	4,877.19	1,362.26
8	Aug 2020	4,853.73	1,265.37
9	Sept 2020	5,742.70	1,541.22
10	Oct 2020	5,862.25	1,576.71
11	Nov 2020	4,108.83	960.78
12	Dec 2020	3,808.76	921.52

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13	Jan 2021	3,338.11	891.33
14	Feb 2021	4,258.42	1,143.53
15	Mar 2021	5,204.74	1,397.65
	<b>Total</b>	70,973.68	18,858.90

<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>Palmtrace Trading License Number</b>	<b>Certified CPO Sold (mt)</b>	<b>Certified PK Sold (mt)</b>
1	IOI Commodity Trading Sdn Bhd	RSPO_PO1000000541	4,087.24	78.77
2	IOI Commodity Trading Sdn Bhd	RSPO_PO1000000541	3,725.67	893.27
3	IOI Commodity Trading Sdn Bhd	RSPO_PO1000000541	4,656.00	1,212.33
4	IOI Commodity Trading Sdn Bhd	RSPO_PO1000000541	5,436.75	1,374.70
5	IOI Commodity Trading Sdn Bhd	RSPO_PO1000000541	2,034.53	1,439.58
6	IOI Commodity Trading Sdn Bhd	RSPO_PO1000000541	502.00	1,709.96
7	IOI Commodity Trading Sdn Bhd	RSPO_PO1000000541	1,266.73	1,457.22
8	IOI Commodity Trading Sdn Bhd	RSPO_PO1000000541	4,150.32	1,176.61
9	IOI Commodity Trading Sdn Bhd	RSPO_PO1000000541	5,559.59	1,684.74
10	IOI Commodity Trading Sdn Bhd	RSPO_PO1000000541	3,703.52	1,655.49
11	IOI Commodity Trading Sdn Bhd	RSPO_PO1000000541	3,803.27	898.00
12	IOI Commodity Trading Sdn Bhd	RSPO_PO1000000541	981.32	969.16
Total			39,906.94	14,549.83

<b>D. Records of CPO &amp; PK Sold under other schemes since the last audit (if any)</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>Scheme Name</b>	<b>CPO Sold (mt)</b>	<b>PK Sold (mt)</b>
Nil	N/A	N/A	N/A	N/A

<b>E. Records of CPO &amp; PK Sold as conventional since the last audit (if any)</b>			
<b>No.</b>	<b>Buyers Name</b>	<b>CPO Sold (mt)</b>	<b>PK Sold (mt)</b>
1	IOI Commodity Trading Sdn Bhd	15,148.28	-

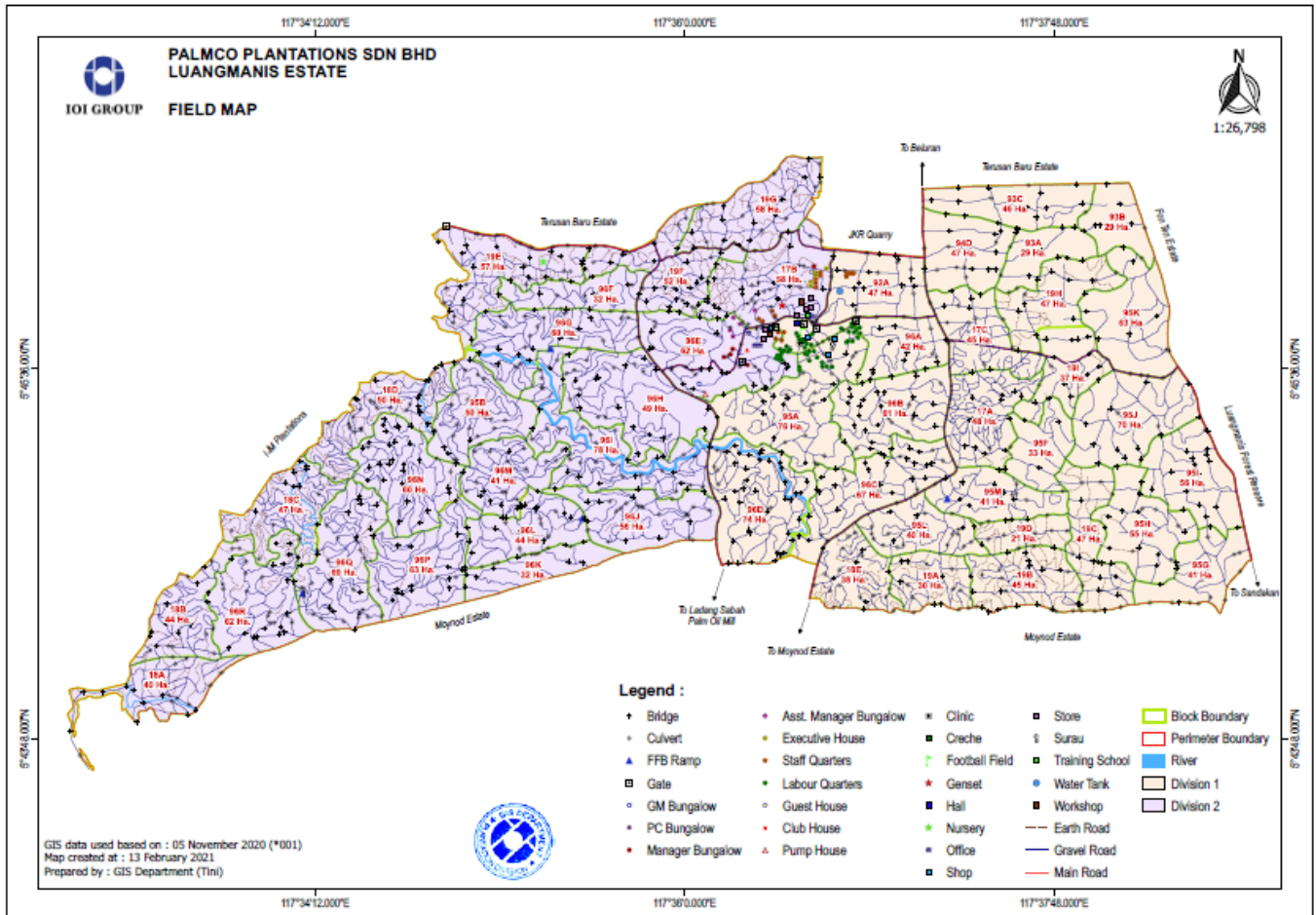
<b>F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)</b>			
<b>No.</b>	<b>Buyers Name</b>	<b>PalmTrace Trading License Number</b>	<b>RSPO Credits of Certified CPO Sold (mt)</b>
Nil	N/A	N/A	N/A



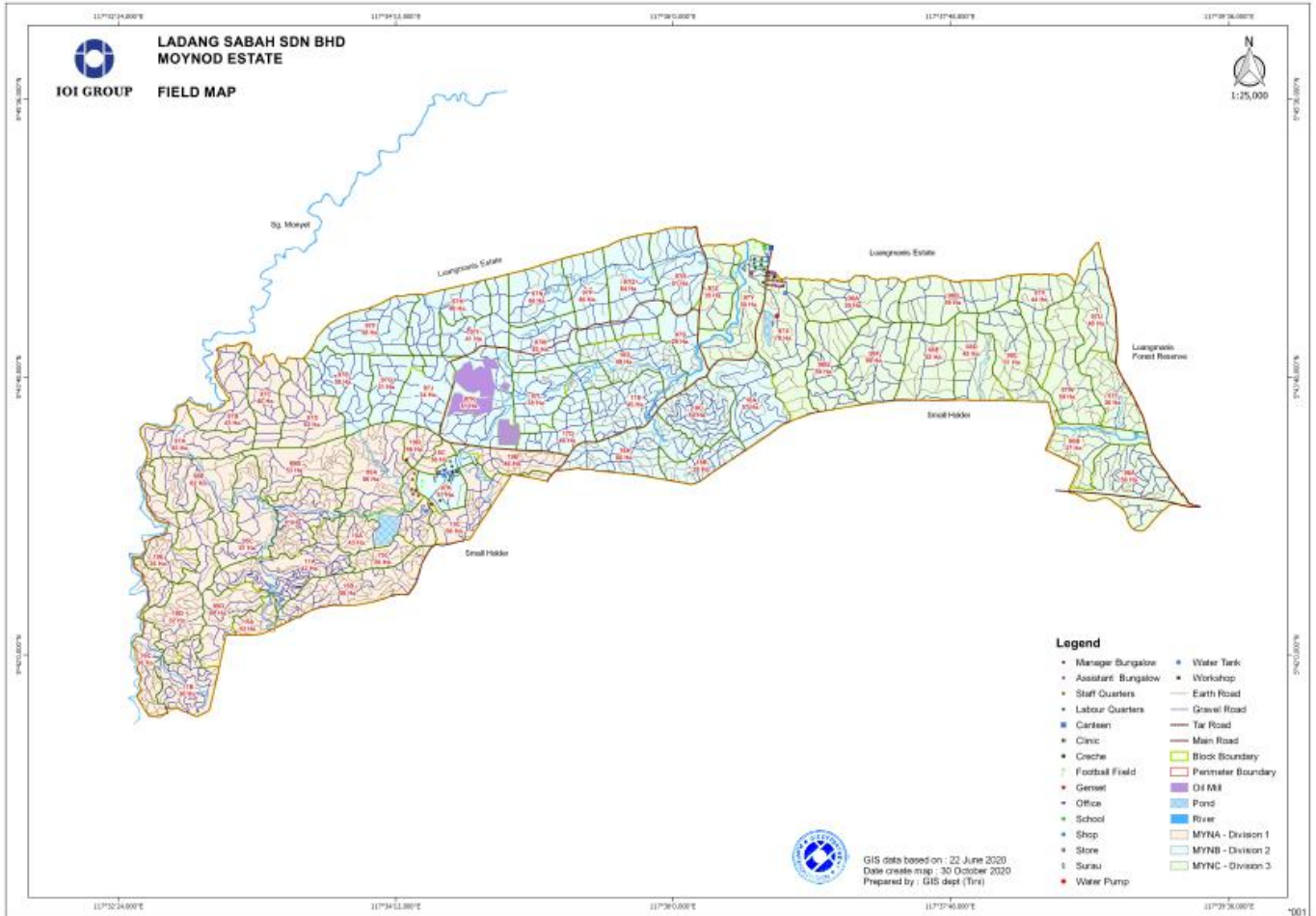


**Appendix F:**

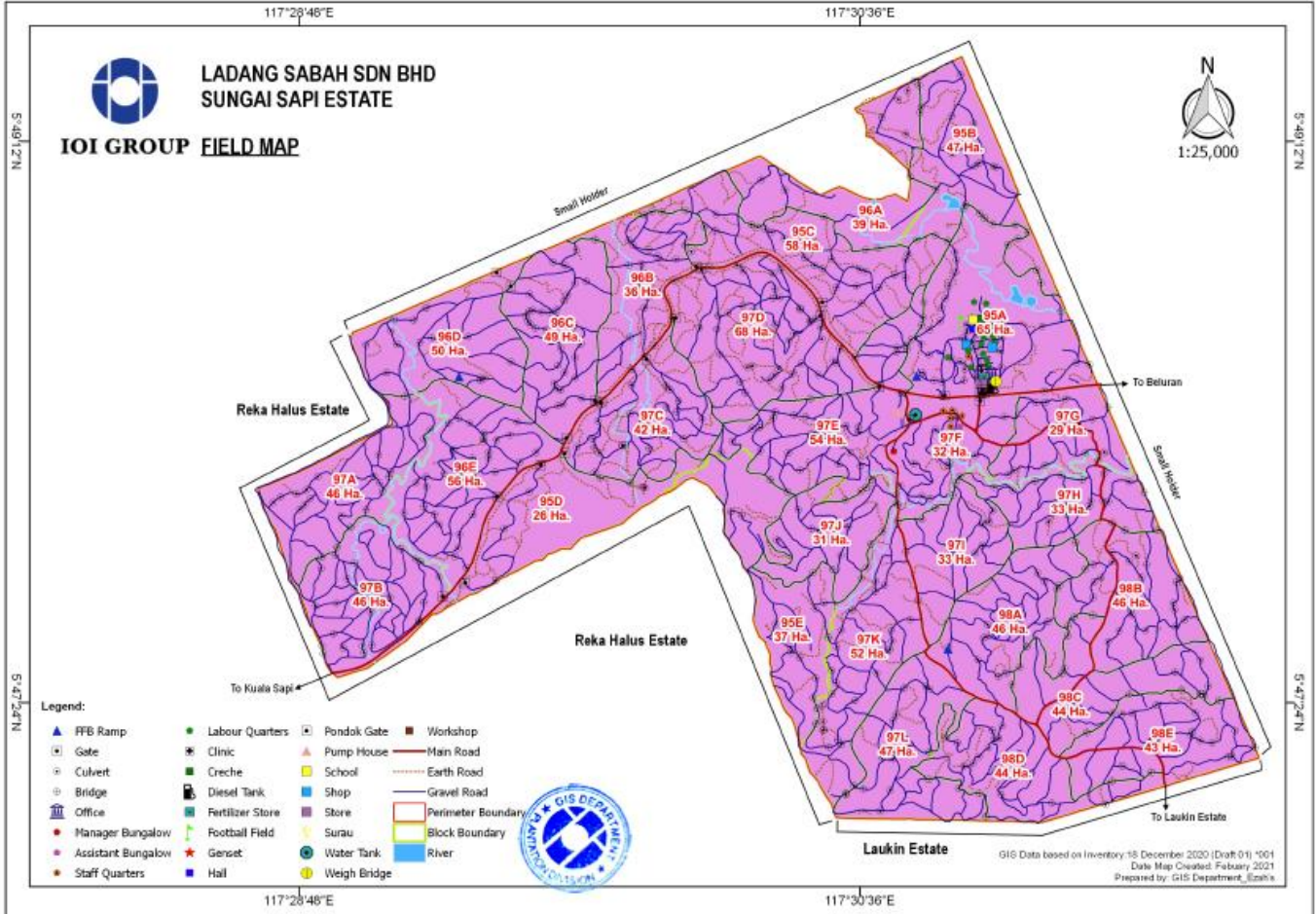
Luangmanis Estate



Moynod Estate



Sungai Sapi Estate



**Appendix G: List of Smallholder Sampled**

Not Applicable because no smallholder scheme in Ladang Sabah certification unit.

## Appendix H: 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
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