

SIRIM QAS INTERNATIONAL SDN. BHD.

Building 4, SIRIM Complex, No. 1, Persiaran Dato' Menteri, Section 2, 40700 Shah Alam, Selangor, Malaysia.

File Ref.: EP09760003

RSPO PUBLIC SUMMARY REPORT

CLIENT: RIBUBONUS CERTIFICATION UNIT PARENT COMPANY: WILMAR INTERNATIONAL LIMITED

RSPO MEMBERSHIP No.: 2-0017-05-000-00

LOCATION OF THE CERTIFICATION UNIT (MILL AND THE SUPPLY BASE): (In the case of multisite certification, list additional sites in attachments):

Certification	Mill and Supply	GPS I	Location	- Location		
Unit	Base	Base Latitude		Location		
Ribubonus Certification Unit	Ribubonus Palm Oil Mill	5.41.20" N	117.05.34" E	Ribubonus Palm Oil Mill Lot 1A, Km 15, Jalan Labuk 90009 Sandakan,		
Onit	Ribubonus Estate	5.41.33" N	117.05.50" E	Sabah, Malaysia		

MAP: See Attachment 1 **AUDIT DATE :** 21-23 May 2018 **DURATION** : 9.0 auditor days **TYPE OF AUDIT:** Annual Surveillance Audit No. 3 Recertification Audit STANDARD: RSPO PRINCIPLE & CRITERIA MYNI 2014, AND RSPO SUPPLY CHAIN CERTIFICATION STANDARD 2014 (REVISED 14 JUNE 2017) SCOPE OF CERTIFICATION: Production of Sustainable Crude Palm Oil and Palm Kernel Using the Mass Balance Supply Chain Model **VALIDITY OF RSPO CERTIFICATE**: 7/09/2015 - 6/09/2020 The following attachments form part of this report: Non-conformity Report(s) List of additional site(s) Report by Audit Team Leader Acknowledgement by Client's Representative Name AMIR B BAHARI Name **Edrin Moss** Signature Signature Date 1/09/2018 Date 5/9/2018

SUMMARY OF AUDITS

Stage 2 audit / Recertification audit							
On-site audit date		:	23-25/06	23-25/06/2015 No. of auditor days :			9
Audit team		:	Mohd Ha	ıfiz Mat Hı	ussain (LA), Khair	ul Najwan Ahmad Jahari	and Valence Shem
No. of major NCR		:	NA	Indicato	r: NA:		Closing date :
No. of minor NCR		:	2	Indicato	r : 6.5.3 & 6.9.3		
Indicate	the	:	Employe	es	Settlers	Villagers	Suppliers
stakeholders			X			X	X
interviewed during	the		Contract	workers	NGOs	Govt. agency	Independent growers
on-site audit			Χ		Х	X	
			Indigeno people	us	Contractor	Others (Please specify	y)
					X		
Supply base sample	d	:	Ribubon	us Estate			

			Annual	Surveillance Au	dit 1		
On-site audit date	:	22-24 Jun	e 2014		No. of auditor days:	9	
Audit team	•		Mohd Razman Salim, Mohd Zulfakar Kamaruzaman, Selvasingam T Kandiah & smail Ibrahim				
No. of major NCR	:	0	Indicator	: NA:		Closing date NA:	
No. of minor NCR	:	3	Indicator	: 2.1.2, 4.1.2 & 6	.5.3		
Indicate by ticking the	:	Employee	s	Settlers	Villagers	Suppliers	
stakeholders		X			X	X	
interviewed during the		Contract v	vorkers	NGOs	Govt. agency	Independent growers	
on-site audit		Χ					
		Indigenou people	5		Others (Please speci	fy)	
				X			
Supply base sampled	:	Ribubonus Estate					
Changes since the last audit	:	2016.	i) Biogas plant is under construction and expected to be completed by December				

Annual Surveillance Audit 2							
On-site audit date :		12-14 July	/ 2017		No. of auditor days:	9	
Audit team :		Ruzita Ab	d Gani, M	lohd Razman Salim	n, Selvasingam		
No. of major NCR :		3	Indicator	:6.5.3,4.1.2 & 4.7.3	3	Closing date :13/10/17	
No. of minor NCR :		3	Indicator	:5.3.3, 4.7.5 & 4.8.	2		
Indicate by ticking the :		Employee	s	Settlers	Villagers	Suppliers	
stakeholders		X			Х	X	
interviewed during the		Contract v	vorkers	NGOs	Govt. agency	Independent growers	
on-site audit		X			Х		
		Indigenou people	S	Contractor	Others (Please speci	fy)	
Supply base sampled :		Ribubonu	s Estate				
Changes since the last : audit		No chang	es				
Report approved by :		Puan Ami	nah Ang		Approval date :	24/10/2017	

Annual Surveillance Audit 3						
On-site audit date :	21-23 Ma	y 2018		No. of auditor days:	9	
Audit team :	Amir B Ba	Amir B Bahari, Mohd Zulfakar Kamaruzaman, Selvasingam T Kandiah				
No. of major NCR :	1	Indicato	: 2.1.1		Closing date: 20/8/2018	
No. of minor NCR :	-	Indicator	1:-			
Indicate by ticking the : stakeholders	Employee	es	Settlers	Villagers / Local communities	Suppliers	
interviewed during the	٦				$\sqrt{}$	
on-site audit	Contract	workers	NGOs	Govt. agency	Independent growers	
	1					
	people	Indigenous Contractor Others (Please sp people			cify)	
	N.					
Supply base sampled :	Ribubonu					
Justification of audit planning	The 4 days mill were for the coverage of indicators relating to; safety and health, environment, mill best practices, GHG verification and Social at Mill and 1 allocated day for Supply Chain Certification Systems. Similarly the audit for the Ribubonus Estate has taken 5 man-day to cover the entire indicators i.e. verification of safety and health/environment, good agriculture best practices and Social, HCV and GHG verification. Though both the mill and estate were located within a complex, the commuting to the complex did incurred considerable traveling time including crossing a river on a ferry. The second half of the final day has been allocated for the discussion and closing meeting. Hence the man-day required to complete the entire audit with an even sampling possible was justified.					
Changes since the last : audit	There we	There were no changes since the last audit.				
Report approved by :	Puan Rad	dziah Moh	d Daud	Approval date: 1/	09/2018	

Annual Surveillance Audit 4							
On-site audit date	:			No. of auditor days :			
Audit team	:						
No. of major NCR	:	Indicato	r:		Closing date		
No. of minor NCR	:	Indicato	r:-				
Indicate by ticking the stakeholders	:	Employees Settlers Villagers / Local communities			Suppliers		
interviewed during the							
on-site audit		Contract workers	NGOs	Govt. agency	Independent growers		
		Indigenous people	Contractors	Others (Please specif	y)		
Supply base sampled	:						
Justification of audit							
planning							
Changes since the last audit	:						
Report approved by	:		-	Approval date :			

SUMMARY OF INFORMATION

TABLE 1

	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period		June 16-May 17	June 17-May 18	June 18-May 19	
Certified FFB Processed (MT)		74516.00	79132.92	74903.92	
Production of Certified CPO (MT)		16577.72	18073.41	16853.38	
Production of Certified PK (MT)		3012.92	3497.91	3220.87	
Certified Areas (Ha)		3262.00	3262.00	3262.00	
Planted Area (Ha) (Mature + Immature)		2729.62	2729.62	2729.62	
Production Area (Ha) (Planted – Immature)		2729.62	2729.62	2729.62	
HCV Areas		258.42	258.42	258.42	
REMARKS	Nil				

TABLE 2

	PO	PK
Last years certified volume (MT)	18073.41	3497.91
Last years actual certified sold (MT)	7262.81	3491.11
Last years actual sold under other schemes (MT)	9943.14	0.00
Last years sold conventional (MT)	0.00	0.00
New year certified volume (MT)	16853.38	3220.87

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	3.4 All associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, are audited within 3 years from when their fruit was first included in the mill certification.	10
	3.5 Any new acquisition which has replaced primary forests or HCV areas	10
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AUDIT PROCESS

1.1 Certification Body

SIRIM QAS International Sdn. Bhd. is the leading certification, inspection and testing body in Malaysia. SIRIM QAS International provides a comprehensive range of certification, inspection and testing services which are carried out in accordance with internationally and nationally recognised standards. Attestation of this fact is the accreditation of the various certification and testing services by leading national and international accreditation and recognition bodies such as the Department of Standards Malaysia (STANDARDS MALAYSIA), the United Kingdom Accreditation Services (UKAS) and the International Automotive Task Force (IATF). SIRIM QAS International is a partner of IQNet, a network currently comprising of leading certification bodies in Europe, North and South America, East Asia and Australia. SIRIM QAS International has vast experience in conducting audits related to RSPO certification. It has certified more than a hundred palm oil mills and several estates to ISO 14001 & OHSAS 18001. SIRIM QAS International has also conducted many audits for sustainable production of palm oil products against the requirements of the RSPO P&C. SIRIM QAS International was approved by the RSPO as a RSPO certification body on 21 March 2008 and accredited by ASI on 27 September 2014.

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Amir B Bahari	Trainee Lead Auditor Mill Practices, Environment & OHS	Possessed B. Sc (Hons) Chemistry from Universiti Sains Malaysia 1985. He has been in the Plantations Industry for 30 years having served Palm Oil Mills and Oil Palm Estates. He was involved in the auditing line since 2014 with experience in GAP, Mill Best Practices, Environmental & OHS.
Mohd Zulfakar Kamaruzaman	Auditor / Social, HCV & Supply Chain	Holds a B.Sc. Forestry from University Putra Malaysia. He had more than 4 years of working experience in the oil palm operation. He has been trained as a RSPO Lead Auditor
Selvasingam T Kandiah	Auditor GAP & OHS	Holds a B.Sc. (Hons) in Agriculture, University of Agricultural Sciences, Hebbal, Bangalore, India. He had more than 28 years of working experience in the oil palm plantations.

1.3 Audit methodology

The audit covered the Ribubonus palm oil mill and Ribubonus Estate. The audit included an on-site udit to the estate and mill to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

1.4 Stakeholder Consultation

The audit team has conducted interviews with relevant stakeholder during the on-site audit. Among the stakeholders consulted were the local communities from Kg. Baba and Kg. Ansuran, foreign workers, canteen operator, sundry shops operator, mill suppliers, Department of Environment, estate mandore, gender representative, person in charge of Humana School and child care facilities, FFB transporters, independent smallholders, outgrower, surrounding FFB collection center.

- 1.5 Audit plan: Refer to Attachment 2
- 1.6 Date of next audit: The next surveillance audit will be conducted within 12 months but not sooner than 8 months from this audit.

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Ribubonus certification unit (CU) is a subsidiary of Sabahmas Plantations Sdn Bhd. (SPSB) which is a wholly owned company of PPB Oil Palms Berhad (PPB Oil Palms). The CU consists of Ribubonus Palm Oil Mill and Ribubonus Estate.

The Ribubonus Palm Oil Mill (Ribubonus POM) commenced its operations in February 2008 with a processing capacity of 30 metric tonnes of fresh fruit bunches (FFB) per hour. During the audit period, the mill was operating in 2 shifts to cater for the higher crop volume against last year. The Ribubonus Estate was fully developed, hence, the principle 7 of the RSPO Principles & Criteria is not applicable. The Ribubonus mill holds the certificate for ISCC and ISO 22000.

2.2 Description of the Supply Base (including the planting profile)

The FFB is sourced from The FFB is sourced from company owned estate that is certified and third party. Details of the FFB actual and projected contribution from each source to the mill are shown in the following tables.

Table 1: Actual FFB production by the supply base for the last reporting period (June 17 to May 2018)

Estates	FFB P	roduction
Estates	Tonnes	Percentage (%)
Ribubonus Estate	81145.43	51.91
Outsider	75159.44	48.09
Reward Plantation Sdn Bhd	0	0
Twin Acre Sdn Bhd	0	0
Smallholders	0	0
Total	156304.87	100.00

Table 2: Projected FFB production by supply base for the next reporting period (June 18 to May 2019)

CU own estates	FFB Contribution			
CO Own estates	Tonnes	Percentage (%)		
Ribubonus Estate	74903.92	51.16		
Outsider	71507.50	48.84		
Smallholders	0	0		
Total	146411.42	100.00		
Other Supply Bases				
Third parties (non-certified)	0	0		
Grand Total	146411.42	100.00		

Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period (June 2017 – May 2018)

	Total (MT)
FFB Received	156304.87
FFB Processed	156303.34
Certified FFB	81145.43
Non-certified FFB	75159.44
CPO Production	34183.94
PK Production	6986.96
CPO delivered as RSPO certified	7262.81
CPO delivered as non-RSPO certified	26098.31
PK delivered as RSPO certified	3491.11
PK delivered as non-RSPO certified	3223.22

<u>Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period</u>
(June 2018 to May 2019)

	Total (MT)
FFB Received	146411.42
FFB Processed	146411.42
CPO Production	32942.57
PK Production	6295.69
CPO delivered as RSPO certified	16853.38
CPO delivered as non-RSPO certified	16089.19
PK delivered as RSPO certified	3220.87
PK delivered as non-RSPO certified	3074.82

Table 5 Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Ribubonus Estate	2729.62	3262.00
Total	2729.62	3262.00

Table 6 Planting profile for Ribubonus CU

<u>Estate</u>	<u>Year of</u> planting	Planting Cycle	<u>Mature</u> (Ha)	<u>Immature</u> (Ha)	<u>Planted</u> <u>area</u>	% of planted area mature	% of planted area immature
	2000	1st	219.08	-	219.08	8.03	i
	2001	1 st	1533.39	-	1533.39	56.18	-
	2002	1 st	944.78	-	944.78	34.61	-
	2007	1 st	17.85	-	17.85	0.65	-
	2009	1st	14.52	-	14.52	0.53	-
	Total		2729.62	-	2729.62	100.00	-

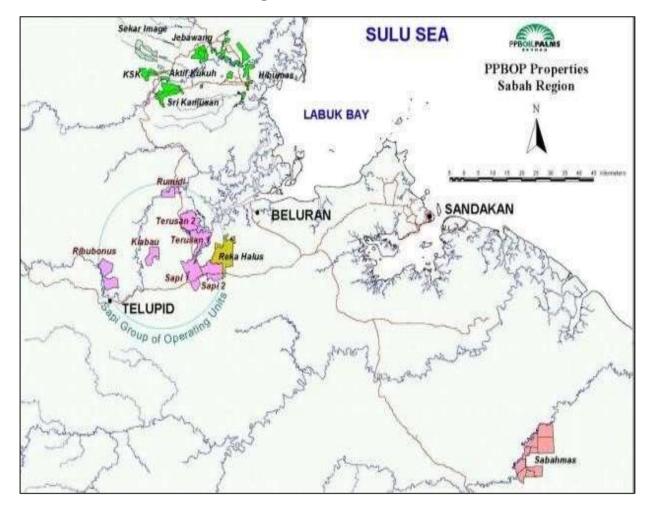
2.3	Organizational Information/Contact Person(s)									
	The details of the	he cont	act person is as shown below:							
	Name	:	Edrin Moss							
	Position	:	Group Manager - Sustainability							
	Address	:	PBB Oil Palms Berhad							
			Sabah Operations , Lot 1A							
			KM 15, Jalan Labuk, Locked Bag 34,							
	Dhanana		90009 Sandakan, Sabah							
	Phone no. Fax no.	:	+089671546/+089670208 +089670260							
	Email		Edrin.moss@my.wilmar-intl.com							
	Liliali	•	Editi.iii033@iiiy.wiiiidi iiidi.coiii							
3.0	AUDIT FINDING	GS								
3.1	Changes to cer	tified pr	oducts in accordance to the production of the previous	year						
	There were no	shanaa	to the cortified products since the last appearment							
	There was no o	change	to the certified products since the last assessment.							
3.2	Progress and cl	hanges	in time bound plan							
i.	Have all the est	ates un	der the parent company been certified?	√ Yes	No					
	If no, comments	s on the	organization's compliance with the RSPO partial certification	cation rules :						
ii.	Are there any c	hanges	to the organization's time bound plan?	Yes	√ No					
	If yes, commen	t in term	s of acceptance or non acceptance on the changes in t	the time-boun	d plan?					
iii.	Are there assoc	ciated si	mallholders (including scheme smallholders) in the	Yes	√ No					
	If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its Ves certification?									
	If no, please sta	ate reas	ons							
iv.	Any new acquis	sition wh	nich has replaced primary forests or HCV areas	Yes	√ No					
3.3	Other changes	(e.g. or	ganizational structure, new contact person, addresses,	etc.)						
	There were no	chango	s since the last audit							

3.4	Status of previous non-conformities * * If not closed, minor non conformity will be upgraded to major non conformity Not closed*								
3.5.	Complaint received from stakeholder (if any)								
	There was no complaint received from external stakeholders. The only complaints were from the workers relating to their quarter's maintenance. There were various stakeholders interviewed during this assessment comprising of local community, sundry shop, workers and contractors / suppliers. Generally, they had provided positive feedback towards Ribubonus CU.								
4.0	DETAILS OF NON-CONFORMITY REPORT								
4.1	For P&C (Details checklist refer to Attachment 3) :								
	Total no. of minor NCR(s) (details refer to Attachment 4) List :0								
	Total no. of major NCR(s) (details refer to Attachment 4) List :1 STK 01								
4.2	For SC (Details checklist refer to Attachment 5):								
	Total no. of minor NCR(s) List: 0 (details refer to Attachment 5)								
	Total no. of major NCR(s) (details refer to Attachment 5) List:0								
5.0	AUDIT CONCLUSION The audit team concludes that the organization has established and maintained its management system in line with the RSPO P&C requirements of the standard and demonstrated the ability of the system to systematically achieve agreed criterion & requirements.								

6.0	RECOMM	ENDATIO	N								
		No NCR r	ecorded. Recomr	mended to continu	ue certificatio	n.					
		Minor NCR(s) recorded. Corrective action plan has been accepted. Verification of the NCR(s) to be carried out in the next audit.									
			or NCRs raised in to major NCRs .	the audit which a	re not addres	ssed in the sub	sequent audit shall be				
	V	Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided and accepted by the audit team. The NCR(s) have been satisfactorily closed out.									
	√	Recommended to continue certification.									
		provided	out not fully acce		team. NCR(s	s) have	e actions have been not been satisfactorily the certificate.				
		Note: Maj being with		re not addressed v	vithin a furthe	er 60 days shall	result in the certificate				
7.0	HAVE BE	EEN SATIS S PLANS I ED AND A	SFACTORILY REPROVIDED ON M	VIEWED, ACCE	PTED AND V FORMITIES	'ERIFIED AND HAVE BEEN S	ON CONFORMITIES ALL CORRECTIVE SATISFACTORILY PO P & C				
Audit	Team Lea	ader :	AMIR BIN I	BAHARI	٨	كسجيميد	20/8/2018				
		_	(Nam	e)	(S	Signature)	(Date)				

Attachment 1

Map of Ribubonus CU



Attachment 2

Ribubonus CU : Assessment Programme Details

Date / Time	Coverage of assessment / Activity / Site	MZK	AB	STK
Day 1 - 21/5/18	MH 2710: Audit team (Amir B Bahari, Selvasingam T Kandiah, Zulfakar Kamaruzaman) travel from KLIA to Sandakan.	1	1	/
11.30am – 1415pm	Sandakan Airport to Ribubonus Certification unit Guest House	•	•	•
8.30am – 9.15am	 Opening Meeting – Venue: Ribubonus POM Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes Organization Representative - Briefing RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases, Time bound plan, actions taken to address previous audit findings. 	1	/	/
9.15am – 12.30pm	Site observation to Ribubonus POM P1, P2, P4, P6, P8 • Verification of basic information mill & estate • Confirmation of time bound plan & review of partial certification • Land titles user rights • Social aspects - SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the CU • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Occupational safety & health aspects, chemical management	/	/	
12.30pm – 1.30pm	Site observation to Ribubonus Estate P1, P2, P3, P4, P5, P7, P8 • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, • New planting • Occupational safety & health aspects, chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management Lunch Break			/
1.30pm – 5.00pm	Continue assessment at respective sites	7	/	/ CT//
Date / Time Day 2 - 22/5/18 8.30am – 12.30pm	Coverage of assessment / Activity / Site Site observation to Ribubonus POM P1, P2, P4 • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the mill • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Occupational safety & health aspects, chemical management	MZK	AB	STK
12.30pm – 1.30pm	Site observation to Ribubonus Estate P1, P2, P3, P4, P7, P8 • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM,New planting • Training and safe use of agro-chemicals. Lunch Break		/	/

1.30pm – 5.00pm	Continue assessment at respective site	/	/	/			
Date / Time	Coverage of assessment / Activity / Site	MZK	AB	STK			
Day 3 - 23/5/18	Site observation to Ribubonus POM						
8.30am - 12.30pm	P1, P2, P5, P8						
	Laws and regulations						
	Environmental management, waste & chemical management	/					
	Interview with workers & contractor						
	• GHG						
	RSPO Supply Chain 2014						
	RSPO Supply chain standard implementation including model requirements						
	Site observation to Ribubonus Estate						
	P1, P2, P6, P7, P8		,				
	Social aspects - SIA, management plan & implementation, workers' quarters	/	,	/			
	Stakeholder consultation with affected communities surrounding the estate						
	Interview with gender committee, safety committee, worker representative, contractors, supplier, etc.						
12.30pm – 1.30 pm	Lunch Break						
1.30 pm -3.30 pm	Verification on outstanding issues	,	,	,			
	Audit team discussion, preparation on audit findings and issuance of nonconformity report (if any)						
3.30pm-5.00 pm	Closing meeting – venue at Ribubonus POM						
	Presentation of audit findings, positive comment,						
	Question & answer	/	/	/			
	END OF AUDIT.						

Attachment 3

RSPO P&C AUDIT CHECKLIST AND FINDINGS

Principle 1: COMMITMENT TO TRANSPARENCY

Clause		Indicators	Comply Yes/No	Findings
C 1.1 Growers and millers provide adequate information to relevant stakeholders on environmental,	1.1.1	There shall be evidence that growers and millers provide adequate information upon request for information on issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making.	YES	It was noted that the CU maintained the management documents relating to environmental, social and legal issues that were relevant to demonstrate compliance with RSPO Criteria. The last stakeholders meeting was conducted on 7/12/17 and attended by, local communities, Contractors, Suppliers and government agencies.
social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.2	Records of requests for information and responses shall be maintained. Major Compliance	YES	There was no request for information related to social issues from stakeholders as verified in the Stakeholders Logbook at the Ribubonus CU. The Ribubonus Estate maintained communication records with DOSH and the Veterinary Department. Mill has provided the necessary reply to all the request and evidences of reply were maintained.
C 1.2 Management documents are	1.2.1	Land titles/user rights	YES	There was no restriction to the documents made available to the public except those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. The CU complies with the terms of the land title which is for agricultural purpose.
publicly available, except where this is prevented by commercial confidentiality or		Occupational health and safety plans	YES	The Occupational Safety & Health programme for 2018 was sighted at both the estate and the mill. a) It has a similar program prepared and assisted by the Sustainability Department at Head Office level. b) It was noted that the CU is in the progress of implementing the OSH programme. c) The Safety and Health Policy was also displayed at various locations including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view.
where disclosure of information would result in negative environmental or social outcomes.		Plans and impact assessments relating to environmental and social impacts	YES	Plan and impact assessments relating to social impacts were made available titled 'Primary Report of the Social Impact Assessment on the Development of Ribubonus Oil Palm Plantations and Palm Oil Mill' dated 2009 and also Social Action Plan FY2018.
		HCV documentation summary	YES	The HCV assessment report titled 'High Conservation Value Identification & Management' dated February 2009 and the HCV Monitoring and Management Action Plan 2018, were made available at the Ribubonus Estate and were reviewed during the audit.
		Pollution prevention and reduction plans	YES	There was no restriction noted as to the documents made available to the public except those prevented by commercial confidentially or where disclosure of information would result in negative environmental or social outcomes. Both the estate and the mill possessed similar pollution prevention and reduction plans assisted by Personnel from the Sustainability Department at Head Office level.

Clause		Indicators	Comply Yes/No	Findings
		Details of complaints and grievances	YES	Details of complaint and grievances were recorded in the Complaint Form, Minutes of Meeting Workers Social and Welfare and Stakeholders Meeting minutes.
		Negotiation procedures	YES	Negotiation procedure entitled "Process for Identification of Legal and Customary Rights and Identifying People Entitled for Compensation" was established since Nov 2008 and made available at the mill and estate. The procedure describes how to check for legal status of the lands in question and defined the criteria in deciding who should be compensated and the amount of compensation.
		Continual improvement plans	YES	Continual improvement plan for social was made available for public at the visited mill and estate.
		Public summary of certification assessment report;	YES	The public certification summary of Ribubonus CU is available at SIRIM QAS website.
		Human Rights Policy	YES	Wilmar Human Right Policy dated June 2014 is available at the estate and the mil. The policy was signed by the Group Plantation Head.
C 1.3 Growers and millers commit to ethical conduct in all business operations and transactions.	1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. Minor Compliance	YES	Ribubonus CU has continued to adopt policy committing to a code of ethical conduct and integrity in all operations and transactions. It has been communicated accordingly.

Principle 2: COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

Clause	Indicators		Comply Yes/No	Findings
C 2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1	Evidence of compliance with relevant legal requirements shall be available. Major Compliance	NO	Ribubonus CU continued to comply with most applicable local, national and ratified international laws and regulations, except for Section 22 of USECHH Regulation 2000 which was not complied with. At time of visit, the chemical register was not up dated as required by the CHRA. Some chemicals in use were not registered in it. Thus, the Major NCR STK 01 2018 was issued. Other than the above non-compliance, as per the requirement in the land title, all land was utilized for planting oil palm. Relevant licenses and permits such as MPOB license, Trading License, Energy Commission and Domestic Trade Ministry for diesel and fertilizer storage were valid.
	2.1.2	A documented system, which includes written information on legal requirements shall be maintained. Minor Compliance	YES	Both Ribubonus Estate and Mill had maintained a legal register which had information about all the applicable legal requirements. The comprehensive Legal Register had been established latest updated in Feb 2018.
	2.1.3	A mechanism for ensuring compliance shall be implemented. Minor Compliance	YES	Ribubonus CU continued to have a mechanism in place for ensuring compliance to legal requirements. The CU complied with the <i>Legal and Other Requirements</i> which was updated in June 2018.

Clause		Indicators	Comply Yes/No	Findings
	2.1.4	A system for tracking any changes in the law shall be implemented. Minor Compliance	YES	Changes to law and regulation were monitored by the Group Sustainability Department. Various sources were referred to in obtaining information about the updates of legal requirements such as industrial association, seminar/conference, law books, government agencies websites
C 2.2 The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal,	2.2.1	Documents showing legal ownership or lease, history of land tenure (confirmation from community leaders based on history of customary land tenure, recognised NCR land and the actual legal use of the land shall be available. Major Compliance	YES	After the review of the document provided, it has been verified that the land titles were previously owned by Sabah Government and sold to Ribubonus Sdn Bhd in June 1998. The Land title also specified that the purpose of the planting is for oil palm cultivation for economic value. It can be confirmed that Ribubonus Sdn Bhd maintained and complied with the terms of the land title. The land title for Ribubonus is country lease.
customary or user rights.	2.2.2	There is evidence that physical markers are located and visibly maintained along the legal boundaries particularly adjacent to state land, NCR land and reserves. Minor Compliance	YES	Boundary markers/ marking pegs were available to identify the boundary and were satisfactorily maintained.
	2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with FPIC. Minor Compliance	YES	As reported in 2.2.1 of this checklist, it has been verified that the land is now legitimately owned by Ribubonus CU since 1998. The audit team had confirmed that there was no land issues related to previous owners.
	2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes are implemented and accepted by the parties involved. Major Compliance	YES	As reported in 2.2.1 of this checklist, it has been verified that the land is now legitimately owned by Ribubonus CU since 1998. Hence, there is no land conflict anticipated and no need for acceptable conflict resolution processes.
	2.2.5	For any conflict or dispute over the land, the extent of the	YES	As reported in 2.2.1, it has been verified that there is no conflict or dispute over the land. It has been further confirmed through interviews with relevant stakeholders.

Clause		Indicators	Comply Yes/No	Findings
	2.2.6	disputed area shall be mapped out in a participatory way with involvement of affected parties. Minor Compliance To avoid escalation of conflict,	YES	As reported in 2.2.1 of this checklist, it has been verified that the land is owned by Ribubonus CU since 1998. Hence,
	2.2.0	there shall be no evidence that oil palm operations have instigated violence in maintaining peace and order in their current and planned operations.Major Compliance	720	there was no land conflict anticipated nor the need to avoid escalation of conflict is required. The audit team has also interviewed relevant stakeholders and from the interviews, it was confirmed that there is no evidence that the oil palm operations have instigated violence in maintaining peace and order in their current and planned operations. Ribubonus CU has employed watchmen in order to guard of their workers, staffs, children, their belongings and company's property.
C 2.3 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free,	2.3.1	Maps of an appropriate scale showing the extent of recognised legal, customary or user rights shall be developed thru participatory mapping involving affected parties. Major Compliance	YES	As reported in 2.2.1 of this checklist, Ribubonus CU has been developed since 1998. a) All the related documentation regarding the land acquisition was kept in PBB (Wilmar) HQ Office, Sandakan and was verified by the auditor. b) There were no issues regarding land with villagers, local community and neighboring estate. c) Hence, there was no map showing the legal, customary, or user right of other users since 1998.
prior, and informed consent.	2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent shall be available and shall include:	YES	As reported in 2.2.1 of this checklist, Ribubonus CU has been developed since 1998. a) All the related documentation regarding the land acquisition was kept in PBB (Wilmar) HQ Office, Sandakan and was verified by the auditor. b) The documentation sighted during the audit showed that there were no issues regarding the land with villagers, local community and neighboring estate since 1998.
	a)	Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision-making;	NA	c) The audit team had also confirmed this through interviews of relevant stakeholders and based on the audit findings, copies of negotiated agreements on FPIC and other evidences required by these indicators a) to c) were not applicable.
	b)	Evidence that the company has respected communities' decisions to give or withhold their consent to the operation	NA	

Clause		Indicators	Comply Yes/No	Findings
		at the time that this decision was taken;		
	c)	Evidence that the legal, economic, environmental and social implications for 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 company's title, concession or lease on the land.	NA	
	2.3.3	Minor Compliance All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. Minor Compliance	YES	As mentioned in 2.3.2 a) to c) of this checklist, this requirement in this indicator does not apply to Ribubonus CU.
	2.3.4		YES	As mentioned in 2.3.2 a) to c) of this checklist, this requirement in this indicator does not apply to Ribubonus CU.

Principle 3: COMMITMENT TO LONG-TERM ECONOMIC AND FINANCIAL VIABILITY

Clause		Indicators		Findings
C 3.1 There is an implemented management plan that aims to achieve long-term economic and financial viability.	3.1.1	A business or management plan (minimum three years) shall be documented That includes, where appropriate, a business case for scheme smallholders. Major Compliance	YES	 Being an established plantation company PPB, commitment to long-term economic and financial viability was a priority to Ribubonus Estate. a) The estate had management plans in their current year's budget and projections. The annual budget and projections were prepared on annual basis i.e. before the end of current year. b) The cost of production and expenditure was reviewed on an on-going basis. The parameters monitored included Capital (CAPEX) and Operating costs. The operating expenditure included expenditure for replanting, mature and immature oil palm upkeep, administration cost, housing and machinery upkeep, allocation for sustainability implementation (environmental, social, occupational safety and health), infra-structure development (roads, etc.), and training.
	3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. Minor Compliance	YES	All palms in Ribubonus Estate were First Generation Palms planted between the years 2000 and 2009. As such the earliest replanting had been scheduled to be planted only in 2022 and in 2023.

Principle 4: USE OF APPROPRIATE BEST PRACTICES BY GROWERS AND MILLERS

Clause	Indicators		Comply Yes/No	Findings
C 4.1 Operating procedures are appropriately documented, consistently implemented and monitored.	4.1.2	Standard Operating Procedure for estates and mills shall be documented. Major Compliance A mechanism to check consistent implementation of procedures shall be in place. Minor Compliance	YES	Documented SOPs and Manuals used in Ribubonus Estate remained the same with no changes made. They were Wilmar International Limited, Agriculture Manual & SOP for Oil Palm, Safe Standard Operating Procedure for Oil Palm Plantations, Safety and Health Manual and Financial Manual - Wilmar International Plantation Malaysian Operations Standard Operating Procedures Checklist. The mechanism to check consistent implementation of procedures on Ribubonus Estate remained the same as per previous reports. The implementations were monitored through on-site visits, inspections and discussions with relevant personnel and by internal audits and RSPO audits.
	4.1.3	Records of monitoring and any actions taken shall be available, as appropriate. Minor Compliance	YES	Records of monitoring and the actions taken in Ribubonus Estate were maintained and kept for a minimum of 12 months.

Clause		Indicators	Comply Yes/No	Findings
	4.1.4	The mill shall record the origins of all third-party sourced FFB. Major Compliance	YES	Ribubonus POM has also received crops from various sources i.e. mainly from surrounding private oil palm plantation and smallholders.
C 4.2 Practices maintain soil fertility at or, where possible, improve oil fertility to a level that ensures optimal and sustained yield.	4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. Minor Compliance	YES	Ribubonus Estate continued have in place good agricultural practices to maintain soil fertility. Soil fertility was maintained as per the SOPs in the Agriculture Manual. It was through regular fertilizer application, biomass retention EFB application, water management in peat areas and maintenance of soft weeds, Leguminous cover crops and <i>Nephrolepis biserrata</i> in the interlines. Ribubonus Estate continued to apply fertilizers as per recommendations made by Head of R&D Department, ECO Management Unit. Annual fertilizer recommendations were made based on annual foliar sampling. Fertilizer application program was monitored using, Bin cards, SAP Stock Movement, Field cost book and Fertilizer Application Audit conducted by ECO Management Unit. In addition, soil fertility had also been managed by recycling of biomass like frond stacking and EFB application, water management in peat areas, maintenance of soft weeds, Leguminous cover crops and <i>Nephrolepis biserrata</i> in the interline.
	4.2.2	Records of fertiliser inputs shall be maintained. Minor Compliance	YES	Records of programs and applications of fertilizers were reviewed during the audit. Records showed that the main fertilizers applied in Mature Oil Palm were RP, MOP, Urea, Kieserite, NK1, NK2, NPK Super K, Borate, GML, and Cu Zn.
	4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. Minor Compliance	YES	The estate continued to carry out periodic foliar and soil sampling to monitor changes in nutrient status of palms. It was noted that annual foliar sampling for the nutrients N, P, K, Mg, Ca & B had been carried out and the result was used as the basis for the fertilizer recommendations to maintain and to improve soil fertility. The last foliar sampling was carried out in Feb 2018 by the EMU. Results of which would be the basis for the formulation of the fertilizer recommendation for 2019. The last soil analysis was carried out in March-April 2015. The soil organic analysis was done to provide indication of soil health and monitor the change of organic carbon and total nitrogen.
	4.2.4	A nutrient recycling strategy shall be in place, and may include use of EFB, POME, and palm residues. Minor Compliance	YES	Ribubonus Estate continued to have a nutrient recycling strategy in place.
C 4.3 Practices minimise and control erosion	4.3.1	Maps of any fragile/marginal soils shall be available. Major Compliance	YES	Based on the soil map by third party carried out in Nov 2000, it was noted that the soil series at the estate consisted of Paniakan/Ambun/Binuang (36.92%), Katai/Sinsulod (30.04%), Baiayo/Serai (17.52%), Binuang/Pinianakan (7.25%), Katai/Nobusu (1.85%), Krah/Serai (1.32%) and Paliu (4.74%).
and degradation of soils.	4.3.2	A management strategy shall be in place for plantings on slopes between 9 and 25 degrees unless specified otherwise by the company's SOP. Minor Compliance	YES	Ribubonus estate possessed a management strategy for plantings on slopes between 9 - 25°. The procedure on land clearing and preparation is detailed in Chapter 3 of the Wilmar International Limited, Agriculture Manual and Standard Operating Procedure 2011.

Clause		Indicators	Comply Yes/No	Findings
	4.3.3	A road maintenance programme shall be in place. Minor Compliance	YES	During the field visit, it was noted that stock piles of stones for road maintenance was observed near a line site. The stones were obtained from their own quarry. The roads conditions in Ribubonus Estate were well maintained. The accessibility was made possible by regular maintenance. The financial support for the road maintenance programs was sighted in the annual budget.
	4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. Major Compliance	YES	Based on a semi detailed soil analysis conducted it was established that the estate had only 1.32% of Krah/Serai series which was considered as peat. The estate also retained water in the drains by having bunds with the drainage system well managed with a water marker. The management has a program to install piezometers for ground water management in this area.
	4.3.5	Drainability assessments where necessary will be conducted prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. Minor Compliance	YES	Due to small size of the peat area, drain ability assessment is not necessary. Nonetheless, the drainage system was found to be well maintained and no replanting had been planned for the area as at now.
	4.3.6	A management strategy shall be in place for other fragile and problem soils. Minor Compliance	YES	Ribubonus Estate had pockets of sandy soils spread out in a number of blocks.
C 4.4 Practices maintain the quality and	4.4.1	An implemented water management plan shall be in place. Minor Compliance	YES	The estate had implemented water management plans having similar goals of common. The recent being issued in Mar 2017 for the 2018 Plan. The water management plans outlined were available and monitored accordingly.
availability of surface and ground water.	4.4.2	Protection of water courses and wetlands, incl maintaining and restoring appropriate riparian and other buffer zones demonstrated. Major Compliance	YES	The estate continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along all natural waterways. The estate adopted the existing PPB policy to maintain the buffer by restricting agrochemicals application and left undeveloped during replanting. The signboards were displayed accordingly at the site where applicable.
	4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, shall be in compliance with national regulations. Minor Compliance	YES	Records of effluent treatment monitoring and Quarterly report to DOE were sampled. The results obtained concludes that the BOD results were within the allowable limit of 20 mg/l. All other parameters were also to be within he approved specification. The CU is also conducting the monitoring of the Sungai Labuk i.e. both upstream and downstream. Sighted the monitoring record all parameter monitored with the stipulated approval condition.
	4.4.4	Mill water use/MTFFB shall be monitored. Minor Compliance	YES	The mill water usage per mt FFB were monitored accordingly.

Clause		Indicators	Comply Yes/No	Findings
C 4.5 Pests, diseases, weeds and invasive introduced species	4.5.1	Implementation of IPM plans shall be monitored. Major Compliance Training of those involved in	YES	Ribubonus Estate continued to monitor the Implementation of IPM plans. The estate had in place documented the IPM plan which covered monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides. Training on IPM implementation was being carried out accordingly. Training records sighted during the
are effectively managed using appropriate Integrated Pest Management techniques.		IPM implementation shall be demonstrated. Minor Compliance		audit.
C 4.6 Pesticides are used in ways that do not endanger health or the environment.	4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. Major Compliance	YES	Justification of the use of pesticides had been documented. The use of selective products that are specific to the targeted pest, weed or disease had been defined in the SPO Manual and Agriculture Manual.
	4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) shall be provided. Major Compliance	YES	Ribubonus Estate continued to record areas where pesticides were used and it was used only when justified and as programmed. The records of pesticides used by area, quantity used, hectares applied, LD 50 and Ai/Ha were made available to auditors. Records were found in store issue chits, bin cards, program sheets, SAP system, field cost books and progress reports.
	4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with IPM plans. There shall be no prophylactic use of pesticides, except in specific situations identified in industry's Best Practice. Major Compliance	YES	Pests, other than weeds were maintained at below threshold levels as per the IPM plan. The estate in order to minimize pesticide usage did not carry out calendar baiting of rats. Rat baiting was only carried out as and when required and only in areas where census showed damage above threshold level. Further, in order to minimize the use of weedicide, only spraying of circle and paths were carried out. Spraying is only carried as per program. Weeds in the inter rows were mainly slashed with minimum spraying. No chemicals were used for VOP control. The VOPs were manually removed.
	4.6.4	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam	YES	There was no evidence to show that Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, were used in Ribubonus Estate.

Clause		Indicators	Comply Yes/No	Findings
	4.6.5	Conventions, and paraquat, are not used, except in specific situations identified in industry's Best Practice. The use of such pesticides shall be minimised and/or eliminated as part of a plan, and shall only be used in exceptional circumstances. Pesticides selected for use are those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in acc. with USECHH Reg. (2000). Minor Compliance Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and	YES	Records showed that pesticides were handled by trained persons and used as per the MSDS/SDS of the pesticide. As mentioned under Indicator 4.6.1, the estate had the SOPs for safe-handing of pesticides. Appropriate safety and application equipment had been provided and used as per the CHRA recommendation. The staff and workers such as the storekeepers, sprayers and those workers apply the fertilizer were trained and they had understood the hazards involve and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to the workers through the MSDS/SDS training. It was also noted that MSDS/SDS are available at all sites during the audit. From
	4.6.6	application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers. Major Compliance Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes. Pesticides shall be stored in accordance to the Occupational Safety and Health Act 1994 (Act 514)	YES	the interviews with the workers and staffs in the fields and stores clerk, it was demonstrated that they had been trained and were aware of safe handling procedures. The chemical store in Ribubonus Estate was observed to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations. The stores were equipped with exhaust fans and secured through locks which were kept by the store keeper. Only authorized personnel were allowed to handle the chemicals. The chemicals were stored and segregated accordingly and fertilizers were well stacked. Relevant MSDS/SDS were available in the stores. Adequate 'Safety Signage' have been placed in the store. Proper premixing area, eye wash bottles and washing area were provided. It was noted that waste water from washing of chemical containers was directly poured into the tank for spraying mixture. Bathing area for sprayers was provided at workers' quarters/ line sites.

Clause		Indicators	Comply Yes/No	Findings
		Pesticides Act 1974 (Act 149) and Reg. Major Compliance		
	4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. Minor Compliance	YES	Application of pesticides was based on and guided by the CHRA recommendation, MSDS/SDS supplied by the manufacturer and the Agriculture Manual.
	4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. Major Compliance	YES	Aerial spraying was not practiced at all PPB estates and there was no evidence to show that this has been carried out in the Ribubonus Estate.
	4.6.9	Evidence of continual training to enhance knowledge and skills of employees and associated smallholders on pesticide-handling shall be demonstrated or made available. Minor Compliance	YES	Training on pesticide/chemical handling was continuously carried out at Ribubonus Estate. The trainings included the safety aspects and usage of PPE when handling with pesticides and herbicides. From interviews with the staff and workers such as the storekeepers and workers who applied fertilizers, it was evident that they have been trained and understood the hazards involve and how the chemicals should be used in a safe manner. Record of training was available for verification.
	4.6.10	Proper disposal of waste material, acc. to proc. that are fully-understood by workers & managers shall be demonstrated. Minor Compliance	YES	Trainings were provided to all level of employees to transpire the knowledge and management of waste in the estate and mill. Training records reviewed during the audit.
	4.6.11	Specific annual medical surveillance for pesticide operators & doc. action to treat related health conditions, shall be demonstrated. Major Compliance	YES	The compliance to this requirement is also parallel to the CHRA report and the recommendation made therein. In addition there was also medical check-up made internally by the Estate Medical Assistant. The mill conducted CHRA in Nov 2017. The document was sighted and verified. The recommendation made in the CHRA was discussed by the management in Jan 2018 and many have been completed as viewed at site. Medical surveillance was made for the relevant mill employees July 2017.
	4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. Major Compliance	YES	The estate complies with the company pocedure whereby no work with pesticides is given to pregnant or breast-feeding women. The estate maintained the list of sprayers. Identification of pregnancy status is made by the respective Medical Assistant during the monthly medical check-up.

Clause	Indicators	Comply Yes/No	Findings
	4.7.1 An occupational healt safety policy shall be in An occupational healt safety plan coverin activities shall be docur and implemented, all effectiveness monitored Major Compliance 4.7.2 All operations where and safety is an issue s	place. YES th and ng all mented nd its d. health YES	There is a Group Occupational Health and Safety Policy endorsed by the Group Plantation Head and Group CSR Head and adopted for use in all estates / mills in the organisation. The policy is available in both English and Bahasa Malaysia. It had been communicated to all levels of the organization through briefings and displayed on notice boards at the mill and estates office and muster ground. Random interviewed with employees showed that they generally understood the basic requirements of the policy. Both the estate and the mill had a similar HIRARC -Hazard identification, risk assessment and risk control in use. Both the HIRARC and CHRA records covered activities in the estates sharing activities in common.
	risk assessed, procedures and actions be documented implemented to addre identified issues. precautions attached products shall be probserved and applied workers. Major Compliance	and s shall and ess the All d to roperly	The list of activities listed in the manual among others is shown below; a) Ribubonus Estate Area / Activities 1 Harvesting / collection of Loose Fruits / FFB loading 2 Spraying 3 Fertiliser loading / mixing / application 4 Welding 5 Store management 6 Tractor driving / School children transportation 7 Gen-set operations 8 Fogging 9 Water treatment operation 10 Motorcycle riding inside the estate complex 11 Harvesting / collection of Loose Fruits / FFB loading b) Ribubonus Palm Oil Mill Area / Activities 1 FFB Grading 13 Store 2 Sterilizer 14 Machine maintenance 3 Kernel Plant 4 Boiler House 16 Lorry inspection 5 Workshop 17 CPO tanker filling 6 Confined space 18 Cleaning of oil trap 7 Laboratory 19 Excavator operations 10 Storage of SW 22 Engine room operations 11 Water Treatment Plant 23 Grass cutting 12 Land Irrigation 24 Upkeep of compound

Clause	Indicators	Comply Yes/No	Findings
	4.7.3 All workers involved operation shall be ad trained in safe practices. Adequa appropriate protect shall be available workers at the place of cover all potentially had operations, such as application, machine land preparation, had and, if it is used, burn Major Compliance	dequately working ate & ive eq. to all of work to azardous pesticide ops, and arvesting	Communication on the hazards of chemical was given through awareness and training program to all workers involved in handling of dangerous chemicals. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE. Training and briefing on the operations were provided for workers to educate them on safe working practices to ensure applicable precautions are adhered. Training for employees were conducted from time to time based on needs through various method such as on the job training, briefings, meetings, etc. The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involved and how the chemicals should be used in a safe manner. PPEs issuance and replacement records were made available to auditors.
	4.7.4 The responsible shall be identified. The be records of regular response the responsible shall be identified.	meetings sponsible workers. es about welfare at these r issues	The forum used by the management to regularly meet with the employees is through the quarterly safety meetings. Both the estate and the mill had established their respective Safety and Health Committee in having the Managers as the Chairman of the safety committee Respectively the Managers of both units appoint the subordinates executives / engineers for the down line implementation of the ESH plans and compliance. The agenda discussed in the meeting among other includes the following. a) Review of last meeting b) OSH committee Program (Training / inspection / reporting) c) Review On OSH Committee d) Accident & Health Statistic e) Lesson Learnt / Enablon/Environmental & Safety/Safety Sharing f) AOB Any Other Business
		e clearly workers. shall be propriate orkforce. trained in resent in other irst aid available ds of all kept and	Both the estate and the mill had established Emergency Response Plan (ERP) initially documented June 2010. The ERP covers incidences among others as follows; Fire, Chemical / Fertiliser Spillage, Flood, Injury Requiring Medical Attention, Bund Breakage, Workplace Violence, Bush Fire, Poisoning and Earthquake. Records of training in relation to the ERP awareness to the employees were reviewed. Accident statistics were maintained and periodically reviewed during the quarterly OSH Committee meeting. In addition submission of accidents incidences is compiled in the JKKP 8 for submission to DOSH every Jan of the new year. Training and briefing on the operations were provided for workers (refer to 4.8.2) to educate them on safe working practices to ensure applicable precautions are adhered. Training for employees were conducted from time to time based on needs through various method such as on the job training, briefings, meetings, etc. The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involved and how the chemicals should be used in a safe manner. PPEs issuance and replacement records were made available to auditors.

Clause	Indicators		Comply Yes/No	Findings
	4.7.6	All workers shall be provided with medical care, and covered by accident insurance. Minor Compliance	Yes	Both estate and the mill provide medical care and insurance coverage for all the workers. Local Workers – covered by SOCSO while Foreign workers were provided with group insurance as required under the Workmen Compensation Act 1992. In addition both units provide medical care to the workers using clinics and hospitals at local and District level. Cases requiring additional/serious treatment are referred to Hospital Sandakan situated 120 km away.
	4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. Minor Compliance	YES	Accidents summary for the year are compiled in JKKP 8 which is a requirement under OSHA 1994. Therein is stated the Lost Tine Accidents statistics. Both estate and the mill maintained the office copy of the submitted form to DOSH. Accident statistics were recorded and periodically reviewed during 'Health and Safety' committee meeting.
C 4.8 All staff, workers, smallholders and contract workers are appropriately trained.	4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO P&C, and that includes regular assessments of training needs and documentation of the prog. Major Compliance	YES	A formal training programme for 2018 covering all aspects of the RSPO P&C. Regular assessments of training needs were prepared by HR Department and transferred down the estates and mills for implementation. Training needs are formalised using <i>training needs assessment form</i>
	4.8.2	Records of training for each employee shall be maintained. Minor Compliance	YES	Both estate and mill use a standard form in maintaining their employees' individual records. Therein is shown details of employees' particulars, date /subject of training and facilitator and signatory of attendance.

Principle 5: ENVIRONMENTAL RESPONSIBILITY AND CONSERVATION OF NATURAL RESOURCES AND BIODIVERSITY

Clause	indicators i i		Comply Yes/No	Findings
C 5.1 Aspects of plantation and mill management, including replanting, that have	5.1.1	An environmental impact assessment (EIA) shall be documented. Major Compliance	YES	Both Estate and the mill had established its environmental aspects/impacts register associated with their activities. The latest revision was made in July 2017. The activities identified for the estates operation among others covers the following; Herbicide spraying, Harvesting & running, EFB application / manuring, Weeding, nursery, P & D, Scheduled Waste collection, transporting, storage and disposal, Nursery, Gen Set Operations, Pest & Disease, Construction of drainage system and Solid Waste Collection, transportation, & disposal.
environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented	5.1.2	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive action plan. The action plan shall	YES	Environmental Impact Assessment Plan are reviewed annually latest being Jan 2018 by the Sustainability Officer. EIA listed for both estates noted no changes in the process /activities as established in 2017. Ribubonus CU has continued to maintain record entitled 'Waste and Pollution - Identification, Assessment, Prevention, Mitigation and Improvement Plan'. Both records were available at the estate and mill. A time table for monitoring has been established and was monitored on a periodic basis. Sighted the Waste Management Plan for 2018 of Ribubonus CU which was established by the ESH staff and approved by the Senior Manager. The plan included the person in-charge e.g. waste generated from housing, manuring activities.

Clause		Indicators	Comply Yes/No	Findings
and monitored, to demonstrate		identify the responsible person/s. Minor Compliance		
continual improvement.	5.1.3	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. Minor Compliance	YES	The estate audited had mitigation measures defined in the Waste Management Plan. The plan is to ensure proper control of the wastes in the estate to prevent pollution. The programme covers the activities, sources of pollution, effect to environment, prevention, and mitigation. The programme also indicated the proposed start and completion date, budget and person in charge as well as the status/verification.
C 5.2 The status of rare, threatened or endangered species other High Conservation Value	5.2.1	Information shall be collated in a HCV assessment that includes both the planted area relevant wider landscape-level considerations. Major Compliance	YES	The HCVF assessment of the estate was completed in February 2009. In addition to the report 'HCVF Scoping Assessment of Ribubonus Estate of PPB Oil Palms Berhad' an additional HCV Report was prepared in May 2017.
habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed	5.2.2	Where RTE species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through an action plan. Major Compliance	YES	Ribubonus Estate has established an action plan for HCV area titled 'HCV Monitoring and Action Plan FY2016 - 2020'. The plan was reviewed in June 2017. Among the activities conducted were HCV monitoring, awareness training to workers, to attend Honorary Wildlife Warden Training and rehabilitation for riparian areas in Ribubonus Estate in December 2017.
to best ensure that they are maintained and/or enhanced.	5.2.3	There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instituted in accordance with company rules and national law if any individual working for the company is found to capture,	YES	A training programme for year 2018 was available. Among others the training included; a) the awareness training for HCV and RTE b) An appropriate disciplinary measures was instituted in accordance to the Company's rules and national law if any individual working for the company is/are found to capture, harm, collect or kill these species.

Clause		Indicators	Comply Yes/No	Findings
		harm, collect or kill these species. Minor Compliance		
	5.2.4	Where an action plan has been created there shall be ongoing monitoring: The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; Outcomes of monitoring shall be fed back into the action plan. Minor Compliance	YES	A continuous monitoring activity was conducted at the Ribubonus CU. The status of HCV and RTE species that are affected by plantation or mill operations were documented and reported. The monitoring activities were conducted by monthly basis. Records sighted accordingly. .
	5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. Minor Compliance	YES	There are no HCV set-asides with existing rights of local communities at Ribubonus CU. It was confirmed during interviewed with the Head of the neighbouring villages. Therefore this indicator was not applicable.
C 5.3 Waste is reduced, recycled, re-used, and disposed of in	5.3.1	All waste products and sources of pollution shall be identified and documented. Major Compliance	YES	All waste and pollution are identified and documented in the <i>Waste And Pollution - Identification</i> , <i>Prevention, Mitigation And Improvement Plan 2017/18</i> . Therein all waste and sources compiled from the estates and mills activities are identified.
an environmentally and socially responsible manner.	5.3.2	All chemicals & their containers shall be disposed of responsibly. Major Compliance	YES	Ribubonus CU disposed their waste material related to pesticide containers as per established procedures. The triple rinsing activities continually being implemented for empty pesticide container. The 'Triple Rinsing' records were maintained and the auditor had verified disposal records accordingly.
	5.3.3	A waste management- disposal plan to avoid or reduce pollution shall be doc and implemented. Minor Compliance	YES	Procedures and guidelines were established for the disposal of the identified waste and pollutants, The Waste and Pollution – Identification, Prevention, Mitigation and Improvement Plans were thereafter formalised for the mitigation and prevention effort.
C 5.4 Efficiency of fossil fuel use and the use	5.4.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy	YES	Ribubonus CU continued to maintain the management plan on efficient use of fossil oil and optimize renewable energy.

Clause		Indicators	Comply Yes/No	Findings
of renewable energy is optimised.		shall be in place and monitored. Minor Compliance		
C 5.5 Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines	5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003. Major Compliance	YES	There was no land prepared by burning at the Ribubonus Estate. The estate had continued to adhere to the policy as per the Agricultural Manual, Green Stacking (Zero Burning) which advocates zero burning for land preparation and as per their Environmental policy item 3 – "Practice zero burning in all plantation development activities and waste disposal."
or other regional best practice	5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003. Minor Compliance	YES	There was no evidence that fire had been used for land preparation in Ribubonus Estate. It was noted that no replanting at the visited estate. The forthcoming program is in 2022.
C 5.6 Preamble Growers and millers commit to reporting on operational	5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4).	YES	Ribubonus CU continued to maintain the "Waste & Pollution Identification Prevention Mitigation & Enhancement Plan". a) The assessment had included all the activities in the estate and mill. b) The information was reviewed on annual basis. c) The dust emission from the mill boiler's chimney was monitored on quarterly basis. The result of the monitoring for chimney no.1 was within the regulatory limit.
greenhouse gas emissions. However, it is recognised that these significant emissions cannot be monitored	5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. Major Compliance	YES	Greenhouse gas emissions were identified to be generated from crop sequestration, fertilizer, N2O from fertilizer, fuel consumption, and peat oxidation. Plans to reduce or minimize them are in place. This has been improved through the newly commissioning of the biogas plant.
completely or measured accurately with current knowledge	5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and	YES	Ribubonus CU is using the RSPO Palm GHG calculator version 3.0.1 (Option 2) as tool to estimate the emissions of its GHG. Verification was carried on the data input in the Palm GHG calculator. From the report the following data was tabulated.
and methodology. It is also recognised that it is not always feasible or practical	r	emissions from estate and mill operations, using appropriate tools. Minor Compliance		Description tCO2e/tProduct Extraction Value CPO 1.01 OER 21.67% PK 1.01 KER 4.21%
to reduce or		1		Page 24 of 57

Clause	Indicators	Comply Yes/No				Find	lings			
minimise these			Land Use		На					
emissions.			OP Planted Area		2729.62					
			OP Planted on Peat		41.7031					
Growers and millers			Conservation (foreste		135.67					
commit to an			Conservation (non-fo	rested)	122.75					
implementation			Total		3029.7431					
period until the end										
of December 2016			Production		t/yr					
for promoting best			FFB Processe		145748.14					
practices in			CPO Produce	ed	31589.125	5				
reporting to the										
RSPO, and			Summary of Plantation	/field emiss	ions and sinl	<				
thereafter to public										
reporting. Growers			Description		Own			3 rd Party		
and millers make				tCO2e	tCO2e/ha	tCO2e/tFFI	tCO2e	tCO2e/ha	tCO2e/tFFB	
this commitment			Land conversion	26622.09	9.91	0.36	0	0	0	
with the support of all other stakeholder			CO2 emission from fertiliser	3295.69	1.23	0.04	0	0	0	
groups of the RSPO. Plans to reduce			N2O emission	3591.68	1.33	0.05	0	0	0	
pollution and emissions, including			Fuel consumption	935.32	0.35	0.01	0	0	0	
greenhouse gases,			Peat Oxidation	2240.44	0.83	0.03	0	0	0	
are developed, implemented and			Crop sequestration	-25145.67	-9.36	-0.34	0	0	0	
monitored.			Sequestration in conservation area	-1224.21	-0.46	-0.02	0	0	0	
			Total	10315.34	3.83	0.14	8584.69	0	0	
			Summary of Mill emiss	ion and cred	dits					
			Description		tCO2		tCO2e/tF			
			POME		18527	.71	0.13			
			Fuel Consumption		661.0)5	0			
			Grid Electricity Utilisa		0		0			
			Export of Excess Ele to Housing & Grid	ectricity	0		0			
			Sale of PKS		0		0			

Clause	Indicators	Comply Yes/No		Fi	ndings	
			Sale of EFB	0	0	
			Total	19188.76	0.13	
			Palm Oil Mill Effluent (POME) Tre	eatment		
			Diverted to compost	0%	6	
			Diverted to anaerobic digestion	100	%	
			POME Diverted to Anaerobic Dig	estion		
			Diverted to anaerobic pond	66	3%	
			Diverted to methane capture (flaring)	18	%	
			Diverted to methane capture (electricity generation)	16	5%	
			The final emissions values pe for this calculation were subm			O₂e/tCPO. The records pertaining e available at the CU offices.

Principle 6: RESPONSIBLE CONSIDERATION OF EMPLOYEES AND OF INDIVIDUALS AND COMMUNITIES BY GROWERS AND MILLERS

Clause	Indicators		Comply Yes/No	Findings
C 6.1 Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way,	6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. Major Compliance	YES	A Social Impact Assessment for Ribubonus CU entitled Primary Report of SIA (Design Phase) for Ribubonus Palm Oil Plantations and Ribubonus Palm Oil Mill of PPB Oil Palm Berhad (Sabah) was conducted in 2009. This SIA report was used as the basis for managing social issues in the CU. The report was prepared with the participation of the relevant stakeholders including the estate workers, governmental agencies, local businesses, panel OHD doctor, contractors/suppliers, neighbouring local communities and outgrowers. This assessment was conducted with full consultation with all the 3 communities living within the vicinity of the estates. In the SIA reports, records of meetings with stakeholders including types of stakeholders, target groups and dates of consultations were documented.
and plans to mitigate the negative impacts and promote the positive ones are made, implemented	6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. Major Compliance	YES	Based on the records available, there is evidence that the assessment was made with participation of all affected parties/stakeholders from smallholders, contractors, nearest villagers in the assessment dated in March 2009. The inputs from the participants were incorporated in the social management action plan.

Clause		Indicators	Comply Yes/No	Findings
and monitored, to demonstrate continual improvement.	6.1.3	Plans for avoidance or mitigation of negative impacts & promotion of the positive ones, monitoring of impacts identified, shall be developed in consultation with the affected parties, doc. & timetabled,incl. responsibilities for implementation. Major Compliance	YES	The SIA Management Action Plan was reviewed in May 2018 after stakeholders meeting with the affected parties in Dec 2017 attended by local communities, Government Agencies, outgrowers and also FFB transporter. The stakeholders meeting were held by the Ribubonus CU to get inputs for reviewing and updating the SIA Management Action Plan 2018.
	6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties Minor Compliance	YES	The plan was reviewed on yearly basis and updated as necessary. In certain cases where the review had concluded that changes should be made to the current practices. The SIA Management Action Plan was reviewed in May 2018 after stakeholders meeting with the affected parties in Dec 2017 and attended by local communities, Government Agencies, outgrowers and also FFB transporter. The Workers Representative Meeting was in Mar 2018 and Gender Meeting was in May 2018.
	6.1.5	Particular attention shall be paid to the impacts of smallholder schemes. Minor Compliance	YES	Presently there was no smallholder scheme for Ribubonus CU. Only independent grower and nearby villagers at Ribubonus CU were sending their FFB to Ribubonus POM.
C 6.2 There are open and transparent methods for communication	6.2.1	Consultation and communication procedures shall be documented. Major Compliance	YES	Consultation and communication procedures used by the CU in handling internal and external communications is identified in Consultation and Communication Procedure. The CU has continued to use the internal communication through morning assemblies, notice boards and posters, suggestion boxes and complaint forms. External communication has been mainly through mail correspondence.
and consultation between growers and/or millers, local communities and	6.2.2	A management official responsible for these issues shall be nominated. Minor Compliance	YES	The Senior Manager has appointed the Senior Assistant Manager to take in charge of Social and Welfare and the consultation and communication with internal and external parties in Mar 2018 at Ribubonus Estate. Similarly for Ribubonus POM, the mill clerk was appointed by the Manager as the PIC of the communication with stakeholders.
other affected or interested parties	6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected	YES	At Ribubonus Estate and POM, the stakeholders list has been updated in April 2018. While the latest stakeholders meeting was conducted in Dec 2017 and attended by local communities.

Clause		Indicators	Comply Yes/No	Findings
		parties, and records of actions taken in response to input from stakeholders, shall be maintained. Minor Compliance		
C 6.3 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all	6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. Major Compliance	YES	In the event of a dispute, complainants and whistleblowers, the CU will manage it through the "Whistle Blowing Policy" and "Dispute and Grievances Procedure", issued in May 2015. The procedure starts with the receipt of complaint from any party, its investigation, proposed solutions and acceptance of the solutions or otherwise. If the proposed solution was rejected, the dispute will be brought for third party arbitration.
affected parties	6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. Major Compliance	YES	The CU reported that in the past there were no disputes, in any form.
C 6.4 Any negotiations concerning compensation for loss of legal, customary or user	6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. Major Compliance	YES	A procedure for identifying legal and customary rights and a procedure for identifying people entitled to compensation were established. In the event, cases involving the loss of customary land rights, the estate will manage them using the procedure entitled "Process for Identification of Legal and Customary Rights and Identifying People Entitled for Compensation" which was adopted in July 2009.
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.	6.4.2	A procedure for calculating and distributing fair compensation shall be established and implemented, monitored and evaluated in a participatory way, & corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants & long-established communities; and differences in ethnic	YES	As described in 6.4.1, the procedure has addressed the determination of compensation. a) The process and outcome of any compensation claims is documented and made publicly available. However, there was no issue other than land claims involving the estate or mill. b) Since last audit, there was no claim for compensation by the local communities made against Ribubonus Estate and Ribubonus POM. c) If there are any cases related to compensation, the procedure for calculating and distributing fair compensation would be carried out at the company level as stated in their standard operating procedure 'Dispute and Resolution Procedure'.

Clause		Indicators	Comply Yes/No	Findings
		groups' proof of legal versus communal ownership of land. Minor Compliance		
	6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. Major Compliance	YES	There was no issue raised related to the compensation claims at Ribubonus CU since the last audit in 2017. The audit team has also interviewed relevant stakeholders and from the interviews, it can be concluded that there was no evidence of any of any negotiated agreements and compensation claims taken place at Ribubonus CU.
C 6.5 Pay and conditions for employees and	6.5.1	Documentation of pay and conditions shall be available. Major Compliance	YES	Pay slip for loader, manurer, sprayer and harvester were verified by audit team. Their wages had followed Minimum Wages Order 2016 where they have been paid at RM35.38 per day with total of RM920 per month (minimum). Employee's payslip and employment agreement had been checked and verified.
for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages	6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment shall be available in the languages understood by the workers or explained carefully to them by a management official. Major Compliance	YES	Contracts for local and Indonesian foreign workers at Ribubonus Estate and Ribubonus POM were sampled. The terms and conditions of employment are contained in the employment contracts and include duration of employment, place of work, salary, working hours, medical benefits, accommodation, annual leave, sick leave, termination of service, and other benefits provided (housing, employment cost, etc).
	6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, in accordance with Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446) or above, where no such public facilities are available or accessible. Minor Compliance	YES	 The CU maintains to provide housing to the workers and provide subsidy for water and electricity consumption. a) Religious, medical, educational (Humana School and child care facilities – Creche) are also maintained to be provided. Any maintenance and service for worker's housing and facilities can be requests from mill and estates management with free of charge. b) During interview with local and foreign workers at the Ribubonus POM and Ribubonus Estate, noted that the workers were satisfied with the accommodation and other facilities provided to them. c) Housing inspections were carried out by members of the health and safety committee as required by Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446). d) Weekly cleanliness inspection at Ribubonus POM and Ribubonus Estate were carried out and reported by the respective Medical Assistant. Issues were identified and appropriate actions initiated. Drinking water analysis as per WHO was carried out by Ribubonus POM and Ribubonus Estate.
	6.5.4	Growers and millers shall make demonstrable efforts to	YES	The CU had demonstrated efforts to monitor and improved workers' access to adequate, sufficient and affordable food by monitoring the price list of the canteen operator and sundry shops. Interviews with

Clause		Indicators		Indicators		Indicators		Findings
		monitor and where able, improve workers' access to adequate, sufficient and affordable food. Minor Compliance		canteen operator, sundry shop Minogulu and sundry shop Kimura found the price list dated in May 2018 were verified by the Ribubonus CU.				
C 6.6 The employer respects the rights of all personnel to form	6.6.1	A published statement in local languages recognising freedom of assoc. shall be available. Major Compliance	YES	A "Human Right Policy" published in June 2014 was available at site. The policy was written in English and languages understood by the workers, included statement that the management recognized the freedom of association, displayed at various locations within the estate/mill area and the CU had also published statement on freedom of workers to join legal union entitled Himbauan.				
and join trade unions of their choice and to bargain collectively. Where the right to freedom of association & collective bargaining are restricted under law, the employer facilitates parallel means of independent & free association and bargaining for all such personnel.	6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. Minor Compliance	YES	As reported in previous audit, the workers are not unionised. However, workers' representatives have been elected by their committee as members of the Social and Welfare Committee and Women and Children Committee in the estates and mill.				
C 6.7 Children are not employed or exploited.	6.7.1	There shall be documentary evidence that minimum age requirements are met. Major Compliance	YES	The child labour policy is publicly available at the visited estates and mill. The policy statements emphasised that child under 18 years must not be employed. This policy is posted on notice boards for the understanding of the public and workers.				
C 6.8 Any form of discrimination based on race, caste, national origin, religion, disability,	6.8.1	A publicly available equal opportunities policy including identification of relevant groups in the local env. shall be documented. Major Compliance	YES	The equal opportunity policy is publicly available in the estate and POM. The policy statements emphasized among others on; worker information, recruitment and selection, training, employee development and terms of service and records of service. This policy is posted on notice boards for the understanding of the public and workers				
gender, sexual orientation, union membership, political affiliation, or age, is prohibited.	6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. Major Compliance	YES	The terms of employment, work assignments, housing policy and other requirements have not been found to be in discrimination. Interviews with workers and other stakeholders also revealed that the Ribubonus CU has not discriminated its staffs and workers.				

Clause		Indicators	Comply Yes/No	Findings		
	6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion where relevant are based on skills, capabilities, qualities, medical fitness necessary for the jobs available. Minor Compliance	YES	Ribubonus CU has demonstrated that recruitment selection, hiring and promotion where relevant are based on skills, capabilities, qualities, and medical fitness necessary for the jobs was available in "Recruitment selection, Hiring and Promotion" for staff and "Recruitment of Workers" for workers.		
C 6.9 There is no harassment or abuse in the work place, and reproductive rights are protected.	6.9.1	A policy to prevent sexual and all other forms of harassment and violence shall be implemented & communicated to all levels of the workforce. Major Compliance	YES	The CU had established policy on sexual harassment. A Policy on Sexual Harassment, Violence and Abuse, Reproductive Rights Policy dated June 2014 was verified and is used as guide actions on the sexual harassment cases in the estates/mill. The policy was communicated to all levels of workforce by displaying it at the notice board and training at Ribubonus POM in Mar 2018 and Ribubonus Estate in Apr 2018.		
	6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. Major Compliance	YES	The CU has established policy on reproductive rights which given their employee to decide freely and responsibly of their planning to have children, and to make decisions concerning reproduction free of discrimination, coercion and violence. Both policies, Sexual harassment and Reproductive rights were displayed at the visited estate, mill, clinic and worker's quarter noticeboard.		
	6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. Minor Compliance	YES	Ribubonus Estate and Ribubonus POM have followed standard operating procedure for handling of grievances / social issues. The SOP titled as 'Anti Sexual Harassment' provided the reporting form called the 'Grievance/Complaint Form for Sexual Harassment'. The chairman of the Women and Children Committee as mentioned in 6.9.1 was responsible in managing any issue raised on sexual harassment. The grievance mechanism had been explained to the committee. The flowchart procedure had been displayed at the visited estates and mill noticeboard.		
C 6.10 Growers and millers deal fairly and transparently with	6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. Minor Compliance	YES	Current and past prices for Fresh Fruit Bunches was displayed by monthly at Ribubonus POM's weighbridge as verified during the audit.		
smallholders and other local businesses.	6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be doc. Major Compliance	YES	A Stakeholders Committee Meeting was conducted at Ribubonus CU in Dec 2017 to discuss issues on pricing and contracts. The meeting was chaired by the Mill Manager. Members of the committee were made up of representatives from the Mill's management, Estate manager, FFB suppliers, contractors and workers representatives. Issues related to FFB transaction were raised and discussed in this Committee.		

Clause	Indicators		Comply Yes/No	Findings
	6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. Minor Compliance	YES	There was no agreement or contract between the mill and the third party FFB suppliers. The suppliers are free to sell their FFB to other surrounding mills or to the private collection centre in the region.
	6.10.4	Agreed payments shall be made in a timely manner. Minor Compliance	YES	Based on interview with FFB transporter, the audit team was informed that payments were made in a timely manner.
C 6.11 Growers and millers contribute to local Sustainable development where appropriate.	6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. Minor Compliance	YES	Contributions to local development that were based on the results of consultation with local communities were demonstrated during stakeholder meeting. Among others the services provided were free ferry services for all villagers, constructing bus stop and open hall for Sk. Pekan Telupid, road maintenance across the estate (to deliver their FFB) and donation to a selected disabled person for house equipment.
	6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity.Minor Compliance	YES	There was no scheme smallholder at Ribubonus CU.
C 6.12 No forms of forced or trafficked labour are used.	6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. Major Compliance	YES	There was no trafficked labour used. This was verified through interview with selected Indonesian workers at Ribubonus POM and Estate, verification of their passport, contract agreements and work permit for field workers. The interviewed workers informed that they were employed voluntarily and freedomly without the threat of a penalty. Workers have the freedom/right to terminate the employment contract without penalty by giving a 28 days' notice.
	6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. Minor Compliance	YES	There is no contract substitution occurred as stated in the labour policy and procedures were established and implemented as Recruitment of Workers". Auditor has verified this through verified through interview with sampled Indonesian workers at Ribubonus POM and Estate to confirm on their understanding on the contract of employment. The interviewed workers have confirmed that the agreement type of work and salary offered were the same.
	6.12.3	Where temporary or foreign workers are employed, a special labour policy and procedures shall be established and implemented. Major Compliance	YES	A special labour policy and procedure known as" Recruitment of Workers" was established. The procedure included the process of employing foreign workers.
C 6.13	6.13.1	A policy to respect human rights shall be documented	YES	A Wilmar Human Right Policy dated June 2014 has been signed off by the Group Plantation Head. The policy was verified at Ribubonus Estate and Ribubonus POM. Awareness briefing for all levels of the

Clause		Indicators	Comply Yes/No	Findings
Growers and millers respect human rights		and communicated to all levels of the workforce and operations. Major Compliance		workforce was conducted and the attendance list and pictorial report was verified during the audit. A leaflet regarding Worker's Rights was distributed to all workers. The policy to respect human rights was documented and communicated to all levels of the workforce and operations at Ribubonus Estate & POM.
	6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation. Minor Compliance		Ribubonus CU had obliged and engaged in the process to secure children of foreign workers access to education by allowing and assisting the establishment of HUMANA school at their plantations.

Principle 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

Ribubonus CU has no plan for any new planting and no new development of area was observed during the visit. Auditors has verified through checking the www.globalforestwatch.com, GOOGLE Maps, Estate Maps and also through site visit to the estate area of Ribubonus Estate. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at Ribubonus CU. Thus Principle 7 is not applicable.

Principle 8: COMMITMENT TO CONTINUOUS IMPROVEMENT IN KEY AREAS OF ACTIVITY

Clause	Indicators		Comply Yes/No	Findings
C 8.1 Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.	8.1.1	The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of indicators covered by these Principles and Criteria. As a minimum, these shall include, but are not necessarily be limited to:		
	a)	Reduction in use of pesticides (Criterion 4.6);	YES	The organisation PBB Oil Palms Berhad documented the commitment towards continuous improvement Plan (CIP) in compliance to principle 8 – Commitment to continuous improvement in key areas of activity.

Clause		Indicators	Comply Yes/No	Findings
	b)	Environmental impacts	YES	Therein the management stated that as a minimum they will include (not necessarily limited) to the following effort a) Reduction in use of pesticides (criterion 4.6) b) Environmental impacts (criteria 4.3, 5.1 & 5.2) c) Waste reduction (criterion 5.3) d) Pollution and green gas GHG emissions (criteria 5.6 & 7.8) e) Social impacts (criterion 6.1) f) Encourage optimising the yield of the supply base. Among the effort as observed during the field visit the following was noticeable; a) Ribubonus estate continued to manage pests, disease and weeds using appropriate IPM techniques. b) In objectives to minimize the use of insecticides, the estates had planted beneficial plants mainly <i>Tunera subulata</i> and <i>Antigonon leptopus</i> . c) The CU was committed to reduce using of chemicals and now focussed spraying confined the palm circles. (Strip) and noxious weeds while woody growths were mainly slashed or should spraying is needed it will be kept at minimum d) Soft weeds and <i>Nephrolepis bisserata</i> were maintained and encouraged in the inter rows. e) EFB was applied in single layers (rate of 40mt /ha) and is not dumped in large amounts to prevent breeding of Rhinoceros Beetles. f) The estate management also monitored the Harvesting Interval to ensure efficient loose fruits collection and expedite circle raking to avoid growth of VOPs. Both the estate and mill reviewed the environmental aspects and impacts on a yearly basis.
	,	(Criteria 4.3, 5.1 and 5.2);		 a) Regular monitoring of water quality, air emission as per the legal requirements was made as per schedule and procedure. b) All internal and external communication on environmental complaints are handled in accordance with the prescribed procedure. c) There was also an implementation of greening programme at the riparian zone and conservation area.
	c)	Waste reduction (Criterion 5.3);	YES	Both the estate and the mill continued to practice 3R (reduce, recycle, re-use) programme on waste management. The Waste Management Plan was established for 2018 similar to the previous years. a) The CU is generally active in maximizing the recycling activities. This is made evident through sales of recyclable materials such as e.g. plastic and metal. b) Usage of the biomass waste to minimize waste such as POME, EFB decanter cake for estate usage. Details in the waste and pollution management plan
	d)	Pollution and GHG emissions (Criteria 5.6 and 7.8);	YES	Ribubonus mill has completed the construction of biogas plant & now in the midst of commissioning stage.
	e)	Social impacts (Criterion 6.1);	YES	The CU continued to implement the identified social action which was developed as a result of stakeholder's consultation and meetings. Contributions to local development that were based on the results of consultation with local communities. Among others the action plan that had been implemented were;

Clause	Indicators		Comply Yes/No	Findings
				 a) Free ferry services for all villagers from Kg. Baba, Kg. Ensuan, Kg. Gading and Kg. Melapi b) Maintain the access road for daily usage of workers, local communities and nearby outgrowers. c) Construction on new housing H-type to replace wooden houses at Ribubonus Estate (Eastern) completion anticipated in Dec 2018.
	f)	Encourage optimising the yield of the supply base. Major Compliance	YES	Ribubonus Estate is part of a well-established organization. The yield performance has always been the top priority in ensuring long-term economic and financial viability. Various efforts have been carried out to optimize the yield of the plantation. These included the following: a) Selection of good planting material. b) Maintaining optimum stand per hectare. c) minimising crop losses, d) ensuring the soil fertility is maintained by timely and proper application of fertilisers, e) EFB application in marginal soil areas f) Maintaining transportation facilities in good condition for efficient crop evacuation.

RSPO CERTIFICATIONS SYSTEMS FOR PRINCIPLES & CRITERIA JUNE 2017

Clause	Indi	cators	Comply Yes/No	Findings
4.5.3 Time-bound plan Note: Where there are isolated lapses in	(a)	As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	YES	It was confirmed that Ribubonus CU received FFBs from its own supply base and outsider FFB. Within the audited period in Year 2018, it was verified that all estate and mill under the name of PPB Plantation were already certified under RSPO scheme. No new acquisitions were sighted.
implementation of a time-bound plan, a minor non- compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised;	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	YES	As mentioned above, this indicator was not applicable to the CU.
	(c)	Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that	YES	No changes to the timebound plan.

4.5.4 Requirements for uncertified management units:	(a)	the company is legally registered with the local notary or chamber of commerce (or equivalent); No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. Any new plantings since 1st January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	YES	There was no uncertified management units at this CU, hence no replacement of the primary forest or any HCV area or no new planting development was sighted.
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6;	YES	There was no uncertified management units at this CU, hence no land conflicts issue arises.
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3;	YES	There was no uncertified management units at this CU hence, no land disputes issue arises.
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	YES	No uncertified management units at this CU, hence no legal compliance issue arises.
	(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 4.5.4 (a) – (d) above by the audit team based on self- declarations only by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:	YES	No uncertified management unit at this CU. Therefore, the requirements under this indicator were not applied.
		 A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement. 	YES	No uncertified management unit at this CU. Therefore, the requirements under this indicator were not applied.
		 Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. 	YES	No uncertified management unit at this CU. Therefore, the requirements under this indicator were not applied.
		Desktop study e.g. web check on relevant complaints	YES	No uncertified management unit at this CU. Therefore, the requirements under this indicator were not applied.
		 If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements. 	YES	No uncertified management unit at this CU. Therefore, the requirements under this indicator were not applied.
4.6.4 The CB shall review whether oil palm operations have been established in		No additional indicators	Yes	As it has been mentioned in 2.2.1 of this checklist, PPB Plantation has bought the land in 1998 from the owner, Sabah State Government. The land titles were for planting either oil

areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check	palm or agricultural crops for economic value. It has been confirmed that PPB Plantation has the right to use the land which is legitimately owned by their company. It has been noted that no land issues related to previous owners and the audit team has also interviewed relevant stakeholders such as the Head of Kg. Baba, Kg Gambaron, Kg Gading and Kg. Ansuran. From the interviews, it can be concluded that there was no evidence of any land dispute at Ribubonus CU.
prior and informed consent and check compliance with the specific terms of	
such agreements.	

Note:

- 1. For requirements 4.5.4 (a)-(d) above, the definition of major and minor NC is stated in the RSPO P&C. For example, if an NC against a major indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless that is actively addressed;
- 2. Failure to address any outstanding NC within uncertified unit(s) regarding 4.5.4 (a)-(d) may lead to certificate suspension(s) to the certified unit(s), in accordance with the provisions of these Certification Systems.

Attachment 4

Details of Non-conformities and Corrective Actions Taken for RSPO P&C MYNI 2014

	Specification Major/Minor	Detail Non-conformances	Corrective Action Taken	Verification by Auditor
Indicator 2.1.1	,	Evidence of compliance with relevant legal requirements shall be available. Section22 of USECHH Regulation 2000 was not complied with. Objective evidence: Ribubonus Estate — At time of visit, the chemical register was not up dated as required by the CHRA. Some chemicals in use were not registered in it	S T T T T T T T T T T T T T T T T T T T	The chemical register has been updated with the following fertilizer; a) NPK Mahkota (13-8-27+0) b) Rock Phosphate The date of the chemical registration was on 11/6/2018. The updated chemical register is provided by the management, sighted and verified Training on chemical register registration had been conducted by the store supervisor, En Ahmad Rezuan to the ESH officer, store attendant and storekeeper on 06/6/18. Training record as provided by the management has been sighted. Status: Closed

Attachment 5

RSPO Supply Chain at the palm oil mill – Mass Balance Model – Module E

SECTION A : GENERAL INFORMATION

1.	File Reference No.	:	EP09760003
2.	Name of facility/ site(s) /entity(ies)	:	PPB Oil Palm Berhad – Ribubonus POM
3.	Site Location (single site/multisite/Group)	:	Lot 1A, Km 15, Jalan Labuk
			90009 Sandakan,
			Sabah, Malaysia
4.	SC model	:	Mass Balance
5.	Type of entity	:	Mill / Crusher / Refinery / Biodiesel plant / Primary Oleochemical / Secondary
			Oleochemical / End product manufacturer
			For oleochemicals and its derivatives, please check the conversion factor against the
			"RSPO Rules for Oleochemicals and its Derivatives" dated 1st December 2016
	DODO Marakar Narakar	-	0.0047.05.000.00 (d.a.) M/laran latamatic mall limits d
6.	RSPO Member Number	:	2-0017-05-000-00 (under Wilmar International Limited)
7	Annual summary records of certified oil palm products purchased and		Transactions records for last year for period of June 17 until May 18
/.	claimed	•	CPO RSPO certified: 18,073.41 mt
	ciaimed		PK RSPO certified: 3,497.91 mt
			CPO Sell: 33,361.12 mt
			CPO Claim as Mass Balance: 7,262.81 mt
			CPO Claim as Non-RSPO: 26,098.31 mt
			PK Sell: 6,714.33 mt
			PK Claim as Mass Balance: 3,491.11 mt
			PK Claim as Non-RSPO: 3,223.22 mt

SECTION B (i): RSPO SUPPLY CHAIN CERTIFICATION SYSTEM (REVISED JUNE 2017)

	Requirements	Remarks
	Audit Process Requirements – FOR STAGE 2 / RECERTIFICATION A	AUDIT
5.3.8	The certification audit shall review whether the organizational systems, the management systems and the operational systems, including any documented policies and procedures of the organization seeking or holding certification, are sufficient and adequately implemented to meet the intent and requirements of the RSPO Supply Chain Certification Standard. Audit Process Requirements – SURVEILLANCE AUDIT	N/A as this audit is a surveillance audit.
5.3.26	The surveillance audit shall review whether the organizational	Ribubonus POM Organizational, management systems and the operational systems,
0.0.20	systems, the management systems and the operational systems, including any documented policies and procedures of the organization holding certification, are sufficient and adequately implemented to meet the intent and requirements of the RSPO Supply Chain Certification Standard. In cases where an organization seeking certification outsources activities to independent third parties, a risk assessment shall be done by the CB to determine whether an audit of the sub-contractor is required. If the outsourced contractor holds RSPO Supply Chain certification, then it does not require an additional audit.	documented policies and procedures of the organization holding certification, are sufficient and adequately implemented to meet the intent and requirements of the RSPO Supply Chain Certification Standard. Sighted Ribubonus POM palm oil mill documented procedure 'SOP Traceability [doc No.: SOP-MILL-019, rev. 6 dated 1/9/2017] and 'SOP Supply Chain and Traceability [doc No.: SOP-MILL-018, rev. 7 dated 1/9/2017]. Both procedures described the implementation of the elements in the supply chain standard requirement 2014 Module D – CPO Mills: Identity Preserved. Among the documented requirements related to delivery of FFB to mill, delivery of CPO and PK to refinery, mass balance calculation, daily production report, checking validity of the certification of the suppliers. The revised procedure has addressed MSPO word in procedure and ISCC and MSPO Requirement. 1.1 Purpose 1.2 Scope 1.3 Definition 1.4 Reference 1.5 General Responsibilities and Certification Requirements - 1.5.1 Purchasing and good in - 1.5.2 Processing - 1.5.3 Sales and good out - 1.5.4 Mass Balance Record Monitoring and Record Keeping 1.6 Description of Mass Balance Calculation and Record. 1.7 Registration of transactions 1.8 Training 1.9 Verification There is no evidence that Ribubonus POM seeking certification outsources activities to independent third parties.

SECTION B (ii): GENERAL CHAIN OF CUSTODY REQUIREMENTS FOR THE SUPPLY CHAIN

	Requirements	Remarks
1	Applicability of the general chain of custody requirements for the	supply chain
1.1	Organization takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors.	Ribubonus POM has legal ownership and physically handles RSPO certified sustainable crude palm oil and palm kernel.
1.2	Traders and distributors require a licence obtained from RSPO to sell RSPO certified product but do not themselves require certification. When selling RSPO certified product a licensed trader and/or distributor must pass on the certification number of the product manufacturer and the applicable supply chain model.	Not applicable due to Ribubonus POM is processing facility.
1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform	RSPO membership no :2-0017-05-000-00 Registered under parent company: Wilmar International Limited
1.4	Processing aids do not need to be included within an organization's scope of certification.	No processing aid involved in Ribubonus POM scope of certification
2	Supply chain model	
2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	Ribubonus POM has aware on the need to downgrading of supply chain model. However, this indicator was not applicable since this POM use MB model.
2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Ribubonus POM has continued to maintain MB model.
3	Documented procedures	
3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:	Ribubonus POM has continued to implement documented procedure 'SOP Traceability [doc No.: SOP-MILL-019, rev. 6 dated 1/9/2017] and 'SOP Mass Balance' [doc No.: SOP-MILL-018, rev. 6 dated 1/9/2017]. Both procedures described the implementation of the elements in the supply chain standard requirement 2014 Module E – CPO Mills: Mass balance. Among the documented requirements related to delivery of FFB to mill, delivery of CPO and PK to refinery, mass balance calculation, daily production report, checking validity of the certification of the suppliers. The revised procedure has addressed MSPO word in procedure and ISCC and MSPO Requirement.
a)	Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.	Supply chain procedure was revised in Sept 2017. The Procedure was sighted and found all elements of the RSPO Supply Chain standard were covered.
b)	Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).	Sighted CPO and PK production record, weighbridge report, dispatch record and training record was up to date and well maintained.
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	The Chief Clerk have overall responsible and authority over the implementation of RSPO supply chain requirement in RSPO Ribubonus POM.

	to demonstrate awareness of the organization's procedures for the implementation of this standard.	Interview with sustainability committee member, mill manager, assistant mill manager & weighbridge operator was confirmed they are understood the supply chain requirements.	
The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and		RSPO internal audit was conducted in Nov 2017. The internal audit has follow the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. There are no nonconformance report (NCR were raised by auditor. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor.	
4	Purchasing and goods in		
4.1	The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and following minimum information for RSPO certified products is made available by the supplier in document form: • The name and address of the buyer; • The name and address of the seller; • The loading or shipment / delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number. 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).	Ribubonus POM had continued received FFB supply from own company estate namely Ribubonus estate and Outsider Crop consist of 12 Grower and 43 Smallholder. Among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight.	
a)	The site shall have documentation that demonstrate that purchases are made to the material category agreed with their supplier (IP, SG or MB).	Ribubonus POM had continued received FFB supply from own company estate namely Ribubonus estate and Outsider Crop consist of 12 Grower and 43 Smallholder. Among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight.	
b)	The site ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcement and	Ribubonus POM has registered in IT platform	

	Shipping Confirmation on the RSPO IT platform on the level of each shipment.		
c)	A check of the validity of the Supply Chain Certification of suppliers for all sites that are SC certified. This shall be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcement	Ribubonus POM had continued received FFB supply from own company estate namely Ribubonus estate and Outsider Crop consist of 12 Grower and 43 Smallholder.	
4.2	The site shall have a mechanism in place for handling non-conforming material and/or documents.	Ribubonus POM has established Weighbridge Nett is cater to control incoming material and outgoing products. The FFB supplier & Product buyer & its vehicle registration has to been registered in the system prior weighing. RSPO Supply Chain procedure item 18.5.1 has indicate the mechanism to handle nonconforming material/documents such as validity of certificate supplying estate.	
5	Outsourcing activities		
5.1	In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. This requirement should not apply to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the organization (not the tank farm manager).	sighted. The agreement document was available and communication on the RSPO supply chain requirement was communicated to them. Record of training was sighted.	
5.2	 Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: a) The site has legal ownership of all input material to be included in outsourced processes; b) The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The responsibility is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The site seeking or holding certification 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 any and all information, when this is announced in advance. 	As above. Inspection was carried out as additional effort to ensure no contamination sighted book at AP Post.	

5.3	The site shall record the names and contact details of all contractors used for the processing or production of RSPO certified materials.	List of contact person for both transporters were made available and up-to-date in the stakeholder list dated in June 2017.		
5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or production of RSPO certified materials.			
6	Sales and goods out			
6.1	The organization shall ensure that the following minimum information for RSPO certified products is made available in document form. Information must 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): The name and address of the buyer; The name and address of the seller; The loading or delivery date; The date on which the documents were issued; A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; Supply chain certificate number; A unique identification number.	The procedure in handling of sale and delivery was sighted and found adequate. Sales activities usually handled by PPB Oil Palms Berhad and Marketing Department (HQ) on behalf of Ribubonus POM. Sample of deliveries document were sighted during the audit and it was found all related information were adequate. Ribubonus POM RSPO certificate number and product name together with model used were stated in the delivery documents.		
7	Registration of transactions			
7.1	 Supply chain actors who: are supply chain actors between the mill and final refinery; take legal ownership and physically handle RSPO Certified Sustainable oil palm products; and are part of the supply chain of RSPO Certified Sustainable oil palm products must register their transaction in the RSPO IT platform at the time of physical shipment as required by the rules set by RSPO. 	Ribubonus POM has legal ownership and physical handle RSPO certified sustainable CPO and PK.		
8	Training			
8.1	The organization shall have a defined training plan, which is subject to on-going review and is supported by records of the training provided to staff.	Annual Training plan 2018 has included the RSPO Supply chain training scheduled in June 2018 and Dec 2018 for staff & workers who related to Supply Chain.		
8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification system. Training shall be specific and relevant to the task(s) performed.	Training was conducted for workers in 22/5/17 by Chin Woon Yee attended by 17 person including Chief Clerk, Manager, Assistant Manager, Weighbridge Staff, Clerk, and Staff related to RSPO Supply Chain. Attendance list & photograph was seen.		

9	Record keeping		
9.1	The site shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.	Sighted CPO and PK delivery note, weighbridge ticket, production data and internal audit records were found up-to-date.	
9.2	Retention times for all records and reports shall be a minimum of two (2) years and must comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	Relevant record was maintained for more than 2 years.	
9.3	The organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	Available.	
10	Conversion factors		
5.10.1	Where applicable a conversion rate must be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which must be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org). This is in particular relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries. The guidance document for oleochemicals is available on the RSPO website (www.rspo.org).	OER and KER used as the conversion factor.	
10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	Yes.	
11	Claims		
11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO rules on communications and claims.	No claim been made.	
12	Complaints		
12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	Documented procedure has established to address collecting and resolving the complaint.	
13	Management review		
13.1	The organization is required to hold management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	Documented procedure has defined management review will be conducted once a year	
13.2	The input to management review shall include information on: • Results of internal audits covering RSPO SCCS • Customer feedback • Status of preventive and corrective actions • Follow-up actions from management reviews	Management review meeting dated in February 2018 (combine RSPO SC and ISCC) a) Internal audit – 0 NCR b) Customer feedback – data analysis show result from customer survey (i.e. RSPO-CSPO related to meeting the contract volume, timely delivery, dispatch documentation) result achieved.	

	Changes that could affect the management system Recommendations for improvement	c) Previous meeting – was highlighted d) Changes e) Recommendation for improvement – improve the established system
13.3	The output from the management review shall include any decisions and actions related to:	Recommendation for improvement Resource is sufficient.
	 Improvement of the effectiveness of the management system and its processes Resource needs 	

RSPO Supply Chain at the Ribubonus Palm Oil Mill – Mass Balance Model – Module E

Item No	Requirement NOV 2014	Findings
E 3 E 3.1	Documented procedures The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following: a) Complete and up to date procedures covering the implementation of all the elements in these requirements b) The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the facilities procedures for the implementation of this standard.	Ribubonus POM has continued to implement documented procedure 'SOP Traceability and 'SOP Mass Balance'. Both procedures described the implementation of the elements in the supply chain standard requirement 2014 Module E – CPO Mills: Mass balance. Among the documented requirements related to delivery of FFB to mill, delivery of CPO and PK to refinery, mass balance calculation, daily production report, checking validity of the certification of the suppliers. The Chief Clerk has overall responsible and authority over the implementation of RSPO supply chain requirement in RSPO Ribubonus POM. Her role is to assist the Mill manager who has overall responsibility for and authority over the implementation of the Supply Chain Standard appointment letter dated in Feb 2012.
E 3.2	The facility shall have documented procedures for receiving and processing certified and non-certified FFBs.	Ribubonus POM has continued to implement documented procedure SOP Mass Balance' relates receiving and processing respectively.
E.4 E.4.1	Purchasing and goods in The site shall verify and document the volumes of certified and non-certified FFBs received.	All certified FFB came from Ribubonus CU estates and non-certified FFB come from independent FFB suppliers. All delivery documents of certified FFB were verified to ensure the certified status of the FFB. Volumes of certified and non-certified FFBs received by the mill had been properly recorded and monitored. All purchasing and sales activities were handled by Sustainability and Supply Chain Department and Wilmar PPBOP Kuala Lumpur (HQ).
E 4.2	The site shall inform the CB immediately if there is a projected overproduction.	The established procedure "SOP Mass Balance" has indicated that Mill Manager is responsible to inform the Sustainability Department (CSR) if there is any or over projected to be over production of certified CPO and PK. Record assessment was confirmed no over-production.

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E.5 E.5.1	Record keeping a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis. b) All volumes of palm oil and palm kernel oil that are delivered	Ribubonus POM had continued to keep record and balances all receipts of RSPO-certified FFBs and deliveries of RSPO-certified CPO and PK on a three-monthly basis in the table 'Quarterly Report/Fixed Inventory Period 2018'.
	are deducted from the material accounting system according to conversion ratios stated by RSPO.	
	c) The site can only deliver Mass Balance sales from a positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short (i.e. product can be sold before it is in stock)	
E 5.2	In cases where a mill outsources activities to an independent (not owned by the same organization) palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement.	Outsource activities are only for CPO & PK transportation. The contracts were handled by the Contract Department at Wilmar HQ in Sandakan Office. There were no outsourcing activity to an independent (not owned by the same organization) palm kernel crush with regards to the processing of the material or product.
E.4 E.4.1	Sales and good out The facility shall ensure that all sales invoices issued for RSPO certified products delivered include the following information: a) The name and address of the buyer; b) The date on which the invoice was issued; c) A description of the product, including the applicable supply chain model (Segregated or Mass Balance) d) The quantity of the products delivered; e) Reference to related transport documentation.	The mill has continued to implement documented procedure related to sales of CPO and PK. All CPO and PK sale to Sandakan Edible Oils Sdn.Bhd. (company own refinery). Sighted the sales invoices issued for RSPO certified product has included name and address of the refinery; date delivered; product description, supply chain model i.e. Mass Balance, quantity of the products delivered as well as transportation documentation such as Borang MPOB L3, Ribubonus mill Weighbridge ticket, Kebenaran Mengangkut /arahan penghantaran from the transporter company, Delivery order from Ribubonus palm oil mill.
E.5 E.5.1	Training The facility shall provide the training for all staff as required to implement the requirements of the Supply Chain Certification Systems.	Training was conducted for workers in May 2017 attended by Chief Clerk, Manager, Assistant Manager, Weighbridge Staff, Clerk, and Staff related to RSPO Supply Chain. Attendance list & photograph was seen.
E.6 E.6.1	Claims The facility shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules for Communications and Claims.	As to date no claim was made.

Attachment 6

VERIFICATION OF NON-CONFORMITIES FOR PREVIOUS SURVEILLANCE RIBUBONUS CU

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action Taken	Verification by Auditor
Indicator 5.3.3	Minor	Waste management and disposal plan related to EFB was not fully implemented. Observed at Ribubonus mill – EFB compost plant was not managed in accordance with waste management plan and <i>Sijil Kebenaran Bertulis</i> (SPE -118/2007 & SPE -007/2008)	Area was cleaned and one operator was dedicated for the composting operation and cleanliness. Canvas was sourced from other mill to cover up composting windrow.	The action plan was acceptable. Effectiveness of the implementation will be verified in the next surveillance audit. 21-23 May 2018 - Housekeeping and area maintenance has been satisfactorily maintained as sighted/observed during this site audit. As such the issue has been adequately addressed and sustained by the management. Status: closed
Indicator 4.1.2	Major (upgraded from minor NC 2016)	The procedure on Palm Trunk Maintenance as per clause 4.0 of chapter 6 (2) Wilmar International Limited Agriculture Manual & Standard Operating Procedure for Oil Palm was not complied with. At time of visit to Ribubonus Estate observed large number of woody epiphytes growths still existed on palm trunks in Block 005.	Epiphytes poisoning programme is developed in order to conduct a systematic poisoning exercise and monitoring. The poisoning of epiphytesat block 005 was completed on 18/7/2017. Warning letter was issued to the staff in charge for him to improve his field work.	Photo of epiphytes poisoning at block 005 were submitted to auditor for verification. Status: Closed
Indicator 4.7.3	Major	Appropriate protective equipment for workers applying fertilisers as per Chapter 3, SSOP for Oil Palm Plantation Manual of PPB Oil Palms Berhad was not being used by workers. Ribubonus Estate — At time of visit all workers applying NPK fertilizer in Block 057 were not using rubber boots.	Procedure for ordering and stocking of PPE for replacement was established. Rubber boots were provided to the concerned manuring gang together with PPE issuance records.	Copy of procedure was verified and found adequate. Photo of the PPE usage was provided to the auditor. Follow-up made during this 21-23 May 2018 audit. Ribubonus Estate, had identified and implemented the use of the following PPE:: a). Harvester - safety helmet/sickle cover/shoes. b) Sprayers – respirator/nitrile glove (chemical resistant) goggles/wellington boots/apron. c) Manuring – apron/wellington boots/dust mask. It was in addition verified that during the visit all workers carrying out harvesting, spraying and applying EFB were observed wearing all required PPE. The closure of this NCR is thus verified.

				Status: Clos	sed	
Indicator 4.7.5	Minor	Ribubonus Estate — At time of visit large first aid boxes were not available for the harvesting gang carrying out harvesting in block 075 and EFB applying gang applying EFB in block 062.		the impleme surveillance a 21-23 May 20 showed that to the mando during their d	audit. 018 Site visit to the fields and the first aid boxes has been lores and being brought alon duties hours.	ne next I mill has provided
Indicator 4.8.2	Minor	Ribubonus Estate — At time of visit records of training for GAP activities like Harvesting, Pruning, Selective Weeding, Manuring, were not available	Field training on the SOP will be provided to various field operation workers & record will be updated.	the implement surveillance During the training (take recorded as	21-23 May 2018 audit the form of the control of the	ollowing AP was with the

Indicator 6.5.3	Major (upgraded from minor NC 2016)	Ribubonus Estate had carried out weekly inspection of workers quarters from September 2016 until March 2017. However, the weekly inspections were not consistently carried out from April to June 2017. Inspection were only carried out as follows: a) 14 June 2017 b) 3, 8 & 31 May 2017 c) 4, 19 & 20 April 2017	Copy of inspection programme &. Photo of the inspection report was provided to the auditor for verification. In addition to the follow-up on this issue the following was recorded to conclude compliance by the management. The weekly cleanliness inspection at Ribubonus POM and Ribubonus Estate were carried out and reported by the respective Medical Assistant. Issues were identified and appropriate actions initiated. The following records were verified: a) Ribubonus Estate: 21/5/18, 17/5/18, 8/5/18, 2/5/18, 26/4/18, 19/4/18, 12/4/18 and 5/4/18 b) Ribubonus POM: 16/5/18, 5/5/18, 24/4/18, 18/4/18, 10/4/18 and 5/4/18 Thus, past NCR MRS 01/2017 was successfully placed.
			Thus, past NCR MRS 01/2017 was successfully closed. Status: Closed