



SIRIM QAS INTERNATIONAL SDN. BHD.
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Section 2, 40700 Shah Alam, Selangor, Malaysia.

File Ref. : EI03590001

RSPO PUBLIC SUMMARY REPORT

CLIENT : IOI CORPORATION BHD – BUKIT LEELAU CERTIFICATION UNIT

PARENT COMPANY : IOI CORPORATION BERHAD

RSPO MEMBERSHIP No.: 2-0002-04-000-00

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

Certification Unit	Mill and Supply Base	GPS Location		Location
		Latitude	Longitude	
Bukit Leelau	Bukit Leelau Palm Oil Mill	03°18'00.0" N	103°08'24.0" E	KM 75 Kuantan-Segamat Highway, 26700 Muadzam Shah, Pahang, Malaysia
	Bukit Leelau Estate	03°18'00.0" N	103°07'48.0" E	
	Detas Estate	03°33'00.0" N	103°03'00.0" E	KM 49 Kuantan-Segamat Highway, 26330 Gambang, Pahang, Malaysia
	Merchong Estate	03°01'12.0" N	103°12'00.0" E	KM 23 Jalan Bukit Ibam-Rompin, 26700 Muadzam Shah, Pahang, Malaysia
	Mekassar Estate	02°59'24.0" N	103°10'12.0" E	KM 24 Jalan Bukit Ibam-Rompin, 26700 Muadzam Shah, Pahang, Malaysia
	Leepang A Estate	03°00'36.1" N	103°01'48.0" E	KM 68 Kuantan-Segamat Highway, 26330 Gambang, Pahang, Malaysia
	Laukin A Estate	03°01'26.1" N	103°02'33.0" E	KM 72 Kuantan-Segamat Highway, 26700 Muadzam Shah, Pahang, Malaysia

MAP : See Attachment 1

AUDIT DATE : 26 – 30 August 2019 &
28 November 2019

DURATION : 21 auditor days

TYPE OF AUDIT : **Annual Surveillance Audit No.4**

Recertification Audit

STANDARD : RSPO PRINCIPLE & CRITERIA MYNI 2014, AND RSPO SUPPLY CHAIN CERTIFICATION STANDARD 2014

SCOPE OF CERTIFICATION: Production of Sustainable Crude Palm Oil and Palm Kernel Using Identity Preserved Supply Chain Model

VALIDITY OF RSPO CERTIFICATE : 19 November 2015 to 18 November 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 : Selvasingam T Kandiah

Name : Ravi Tony

Signature :

Signature :

Date : 5/12/2019

Date : 10/12/2019

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SUMMARY OF AUDITS

Stage 2 audit				
On-site audit date	:	24-28/08/2015	No. of auditor days	: 15
Audit team	:	Mohd Hafiz Bin Mat Hussain, Valence Shem, Selvasingam T Kandiah, Roslee Bin Jamaludin (Technical Expert/ HCV)		
No. of major NCR	:	1	Indicator: 4.4.2	Closing date : 20/09/2015
No. of minor NCR	:	1	Indicator: 5.6.3	
Indicate the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers / Local communities
		/		/
		Contract workers	NGOs	Govt. agency
		Indigenous people	Contractor	Others (Please specify)
		/		
Supply base sampled	:	Bukit Leelau Estate and Detas Estate		
Justification of audit planning	:	-		
Report approved by	:	-	Approval date : -	

Annual Surveillance Audit 1				
On-site audit date	:	26-30/09/2016	No. of auditor days	: 15
Audit team	:	Hazani Othman (Lead Auditor), Mohd. Razman Salim, Selvasingam T. Kandiah, Mohd Ab Raouf Asis (Trainee)		
No. of major NCR	:	5	Indicator: 2.1.1, 4.1.1, 4.8.1, D3.1, D5.1	Closing date: 29/11/2016
No. of minor NCR	:	2	Indicator : 2.1.3, 4.3.3	
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers / Local communities
		/		
		Contract workers	NGOs	Govt. agency
		Indigenous people	Contractor	Others (Please specify)
		/	/	
Supply base sampled	:	Merchong Estate, Mekassar Estate		
Changes since the last audit	:	<p>A new Senior Manager (Mr. Tan Kim Ha) was appointed on 22.06.2016 to replace the Plantation Controller Mr. Leang Hon Wai who has been transferred from the CU. Both visited estates also had new Estate Managers – Mekassar Estate – Mr Yogesvaran Paramasivam from 26.03.2015 and at Merchong - Mr. Arul Armugham from 11.08.2016.</p> <p>New supply based Leepang A has been included in the certification. However, the site was not sampled as it was audited by the previous CB in re-certification audit in March 2016. All the major NCs were satisfactorily closed.</p>		
Justification of audit planning	:	-		
Report approved by	:	-	Approval date : -	

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Annual Surveillance Audit 2			
On-site audit date	: 11-15 September 2017	No. of auditor days	: 16
Audit team	: Mohd Razman Salim, Mahzan Munap, Mohd Ab Raouf Asis & Zulkarnain Abdullah		
No. of major NCR	: 2	Indicator: 4.3.4 & 5.2.1	Closing date: 13/11/2017
No. of minor NCR	: 2	Indicator : 2.2.2 & 5.2.5	
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees	Settlers	Villagers / Local communities
	/	/	/
	Contract workers	NGOs	Govt. agency
	/	/	/
	Indigenous people	Contractor	Others (Please specify)
	/	/	/
Supply base sampled	: Bukit Leelau Estate, Leepang A Estate & Laukin A Estate		
Changes since the last audit	: 1. One new supply base (Laukin A Estate (1,564.90Ha) was transferred to this CU from Pukin CU (certified by Intertek). 2. The certified area for Leepang A Estate has been corrected to 2403.70 ha (1603.00Ha + 800.70Ha).		
Justification of audit planning	: -		
Report approved by	: Aminah Ang	Approval date: 20/12/2017	

Annual Surveillance Audit 3			
On-site audit date	: 24-27 September 2018	No. of auditor days	: 21
Audit team	: Mohd Ab Raouf bin Asis (LA), Mohd Razman bin Salim (A), Mohd Zulfakar bin Kamaruzaman (A), Suzalina binti Kamaralarifin (A), Rahayu binti Zulkifli (A), Selvasinggam T. Kandiah (A)		
No. of major NCR	: 5	Indicator: 1.1.2, 4.1.1, 4.8.1, 6.5.2, 5.4.1 (SC)	Closing date : 21/12/2018
No. of minor NCR	: 3	Indicator: 4.1.2, 4.7.5, 6.10.4	
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees	Settlers	Villagers / Local communities
	/	/	/
	Contract workers	NGOs	Govt. agency
	/	/	/
	Indigenous people	Contractor	Others (Please specify)
	/	/	/
Supply base sampled	: Bukit Leelau Estate, Merchong Estate, Mekassar Estate, Detas Estate		
Changes since the last audit	: No changes		
Justification of audit planning	: Total allocation of auditor days for Bukit Leelau CU were: 21.0 auditor days Mill = 5 days (4 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems). Estate = 4 days each for the four estates (Bt. Leelau, Merchong, Mekassar & Detas) for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title.		
Report approved by	: Radziah binti Mohd Daud	Approval date : 28/12/2018	

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Annual Surveillance Audit 4				
On-site audit date	: 26 to 30 August 2019 & 28 Nov 2019	No. of auditor days :	21	
Audit team	: Selvasingam T Kandiah (TLA), Mohd Zulfakar bin Kamaruzaman (A), Rahayu binti Zulkifli (A), Dzulfiqar bin Azmi (A) & Suzalina binti Kamaralarifin (A),			
No. of major NCR	: 4	Indicator: 4.1.2 (Recurrent Minor), 5.1.1, 6.12.3 & D.4.2 (Supply Chain)	Closing date : 29/11/2019	
No. of minor NCR	: 0	Indicator : -		
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
	/		/	/
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
			/	/
	Indigenous people	Contractors	Others (Please specify)	
	/	/	Mill Canteen Operator	
Supply base sampled	: Bukit Leelau Estate, Detas Estate, Laukin A Estate, Leepang A Estate			
Changes since the last audit	: It has been noted that there were changes in the personnel holding management positions of the company in Aug 2019 i.e. Plantation Controller retired, Estates Manager replacement.			
Justification of audit planning	: Total allocation of auditor days for Bukit Leelau CU were: 21.0 auditor days Mill = 5 days (4 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems). Estates = 4 days each for the four estates (Bukit Leelau, Detas, Laukin A & Leepang A) for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title.			
Report approved by	: Kamini Sooriamorthy	Approval date : 5/12/2019		

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SUMMARY OF INFORMATION

TABLE 1

	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	August 2015 – July 2016	August 2016 – July 2017	September 2017 – August 2018	September 2018 – August 2019	September 2019 – August 2020
Certified FFB Processed (MT)	141,982.50	176,730.00	202,820.00	215,327.00	237,320.00
Production of Certified CPO (MT)	32,746.37	40,648.00	48,169.75	49,525.21	56,005.35
Production of Certified PK (MT)	7,113.08	9,278.00	9,633.95	10,228.00	10,796.61
Certified Areas (Ha)	-	-	11,434.17	*11,489.17	11,489.17
Planted Areas (Ha)	-	-	9,880.00	9,880.00	***9,880.00
Production Areas (Ha)	-	-	7,389.00	8,115.13	8,343.00
HCV Areas / Conservation Areas (Ha)	-	-	18.84	**16.53	****22.66
REMARKS	<p><u>ASA-03; Sept 2018 to Aug 2019</u> *The certified area has been based on the latest copy of permanent land titles where specified that the certified area for Laukin A Estate was 1,619.90 Ha (instead of 1,564.90 Ha provided in the previous land title).</p> <p>**Total HCV Areas Hectarage reduced from 18.84 Ha to 16.53 Ha as some of the previously declared HCV such as worshipping areas and ponds were re-categorized under Environmentally Sensitive Area.</p> <p><u>ASA-04; Sept 2019 to Aug 2020</u> ***Although there was no change to the overall planted areas, it was noted that there was a reduction of 2 Ha of the planted area in Bukit Leelau Estate due to construction of new road and re-designation of river and riparian reserve area. However, there was also an increase of 2 Ha of the planted area in Detas Estate as the nursery area has been replanted.</p> <p>****The HCV area has been revised to be in accordance with the latest HCV report dated in Aug 2019.</p>				

TABLE 2

	PO	PK
Last years certified volume (MT)	*51,798.42	10,228.00
Last years actual certified sold (MT)	44,740.98	8,720.37
Last years actual sold under other schemes (MT)	0.00	0.00
Last years sold conventional (MT)	7,792.76	635.52
New year certified volume (MT)	56,005.35	10,796.61

*Extension of CPO volume has been applied and approved by the RSPO EB.

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1.0 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 re-accredited by ASI on 3 October 2019 (accredited since 2014).

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Selvasingam T. Kandiah	Trainee Lead Auditor, Good Agricultural Practices	Holds a B.Sc. of Agriculture University of Agricultural Sciences, Hebbal, Bangalore, India. He had more than 28 years of working experience in plantation management covering cocoa, rubber and oil palm.
Mohd Zulfakar bin Kamaruzaman	Auditor & Evaluator Environment & HCV	Holds a B.Sc. Forestry. He had more than 4 years of working experience in the oil palm operation. He is a qualified RSPO P&C, RSPO Supply Chain and MSPO Lead Auditor.
Rahayu binti Zulkifli	Auditor, Social	Holds a Degree in LLB (Hon), she was a practicing lawyer before joining WWF-Malaysia and RSPO as a Dispute Settlement Facility Manager. She is now working as a freelance RSPO auditor
Dzulfiqar Azmi	Auditor, Safety & Environment	Holds a B. Sc. in Agriculture from University Teknologi Malaysia (UiTM). He had more than 5 years of working experience in the oil palm operation. He starts auditing in the sustainable scheme since 2018 and has successfully passed the RSPO Lead Auditor and ISO Integrated Management System lead assessor course in 2018.
Suzalina binti Kamaralarifin	Auditor, Supply Chain	Holds a B. Sc. of Industrial Chemistry from University Teknologi Malaysia. She had 8 years of working experience in the palm oil related industry of POM, Oleo chemical & refinery. She is a qualified Lead Auditor for RSPO Supply Chain.

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1.3 Audit methodology

The audit covered the one palm oil mill and four of its supply base. The sampling of the number of the supply base was using the formula of $0.8\sqrt{y}$. The four supply base covered during the audit are Bukit Leelau Estate, Detas Estate, Laukin A Estate and Leepang A Estate. The audit included an on-site audit to the Mill and Estates 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

Stakeholder consultation was carried out during the on-site audit. In general, there was no negative comments made against this Certification Unit. In summary, the stakeholders interviewed during the audit and the evidence from the stakeholder consultation carried out were as tabulated below:

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (including migrant workers)	<p>The following were confirmed during the conduct of audit as there was no evidence to prove otherwise:</p> <ul style="list-style-type: none"> ▪ All workers signed the employment agreements with the estates/mill. They understood the contents of agreement, as these were prepared in Hindi//English/Bahasa as the case may be. For those who couldn't read, the contents were explained to them in language they understood, usually by fellow countrymen who has worked in Malaysia longer. ▪ They are aware of their working hours (8 hours) and confirmed they were paid overtime for any work in excess of 8 hours. There was no forced overtime. ▪ They have been getting salaries above RM1,100 since January 2019. Salaries were paid before the 7th of every month. ▪ No abuse at work, and no sexual harassment. They understand what constitutes sexual harassment. ▪ No discrimination between migrant workers and local workers, between male and female workers. ▪ Comfortable housing with water and electricity provided. Local workers choose to stay in their houses in the nearby villages. ▪ Have access to affordable food from the canteen/sundry shops within the estate/mill premises. ▪ Entitled to free medical facilities at the estate clinic. ▪ Have representatives who attend regular meetings with the management where they can put forward any complaints and or raise any issues. They are aware of the complaints form. They have used them to complaint about house defects. ▪ They knew the types of work offered at Bukit Leelau CU (mill & estate) when they were in their own countries. ▪ All migrant workers keep their own passports.
2) Settlers	Not available for this audit.
3) Villagers / Local communities (including women representatives, displaced communities)	<ul style="list-style-type: none"> ▪ Interviewed local communities from Kg Gadak. They are actually Orang Asli community who have been offered settlement in Kg Gadak. ▪ No land dispute. Borders with Leepang A and Laukin

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	<p>Estates.</p> <ul style="list-style-type: none"> ▪ Many villagers are now oil palm smallholders.
4) Suppliers	<ul style="list-style-type: none"> ▪ Supplier of hardware since 1997. ▪ Fair dealings with the units in Bkt Leelau CU. ▪ Payments are made within 1 months of invoice.
5) Contract workers	Not available for this audit.
6) Local & national NGOs	Not available for this audit.
7) Government agencies / Statutory bodies	<ul style="list-style-type: none"> ▪ JAKOA. The indigenous peoples living near the Bukit Leelau CU are from the Jakun tribe. ▪ No land claims/disputes and no social issues. ▪ Harmonious co-existence. ▪ Bukit Leelau Estate is closest to Kg Runchang, Kg Tg Kelapa and Kg Chak.
8) Independent growers / Smallholders	<ul style="list-style-type: none"> ▪ Interviewed local communities from Kg Gadak. They are actually Orang Asli community who have been offered settlement in Kg Gadak. No issue.
9) Indigenous people	<ul style="list-style-type: none"> ▪ Orang Asli Kg Runchang & Kg Menchupu. No social issues with Bkt Leelau CU. They have been around in the area before the land was cleared for plantations. There is no land disputes. ▪ Many of them also have their own oil palm smallholdings and no longer practice hunting-gathering. They have their own land on which they plant oil palm, rubber and fruit trees. ▪ Some roads are damaged but complaints have been made to the estate manager and repairs have been carried out. ▪ No issue about pollution. ▪ Some workers who work at Rancangan Tanah Kelompok Khas Kg Menchupu come to Klinik Detas to get medical treatment.
10) Contractor	<ul style="list-style-type: none"> ▪ Contractor A supplies JCB. Has been providing services to Detas & Bkt Leelau Estates for the past 4-5 years. Signed a contract and understands contractual obligations and the need to comply with legal requirements. ▪ Has two workers; himself and his brother. ▪ Fair dealings with the units in Bkt Leelau CU. ▪ Payments are made within 1 months of invoice. ▪ The estate manager and staff will verify the work he has done before his invoice can be approved for payment. ▪ Has attended MSPO training and safety briefing. The Company provides PPE (vest, goggles, straw hat). ▪ Contractor B is an FFB transporter (estates to mill). Been providing services for the past 20 years. Also send CPO from Bkt Leelau Mill to refineries in Klang and Pasir Gudang. ▪ Signing of contract was with IOI HQ. Contract terms are clear and fair. Payment made usually within 45 days of invoice. Renewal of contract is via tender system. Employs two lorry drivers. Knows about minimum wages and drivers are paid RM150 per day, and make statutory contributions such as EPF and SESCO. ▪ Contractor C removes domestic waste from workers' quarters, provide recycling services. Signs annual contract. Terms and conditions are clear and fair. Payments are received within one month. Have attended MSPO briefing and stakeholder meetings. Gives estate copies of worker details and payslips.
11) Previous land owner (if any)	Not available for this audit.

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12) Others (please specify)

Mill canteen operator.
Opens 7AM to 10PM, sells food, drinks, tidbits.
Attended a food handling course at the Akademi Latihan Kualiti Makanan. Operator and her workers have all been vaccinated against thypoid.

1.5 Audit plan : Refer to Attachment 2

1.6 Date of next audit : The next RA will be conducted at least 4 months prior to expiry date of the certificate.

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Bukit Leelau Certification Unit is one of the business unit under the IOI Corporation Berhad. The CU consists of Bukit Leelau Oil Mill, Bukit Leelau Estate, Detas Estate, Merchong Estate, Mekassar Estate, Leepang A Estate and Laukin A Estate. Bukit Leelau Oil Mill, Bukit Leelau Estate, Detas Estate, Mekassar Estate, Leepang A Estate and Laukin A Estate are the subsidiaries of Perusahaan Mekassar (M) Sdn.Bhd. while Merchong Estate is the subsidiary of Syarikat Pukin Ladang Kelapa Sawit Sdn.Bhd. Both Syarikat Pukin Ladang Kelapa Sawit Sdn. Bhd. and Perusahaan Mekassar (M) Sdn. Bhd. are the subsidiaries of IOI Corporation Berhad. The registration of RSPO Supply Chain in the RSPO PalmTrace for traceability of sustainable crude palm oil is under the name of Perusahaan Mekassar (M) Sdn. Bhd. The Bukit Leelau Oil Mill has a processing capacity of 40 metric tonnes of fresh fruit bunches (FFB) per hour. The mill only received and processed crops from its own estate.

The Bukit Leelau CU was fully developed hence Principle 7 of the RSPO Principles & Criteria is therefore not applicable. Bukit Leelau mill and all its supply bases have discontinued with ISCC certification.

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

The FFB is sourced from company owned estates in the Bukit Leelau CU, IOI Sister Estates and Certified Outsider Estates. The 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
(September 2018 to August 2019)

Estates	FFB Production	
	Tons	Percentage (%)
Bukit Leelau Estate	17,953.31	8.35
Detas Estate	47,005.67	21.85
Merchong Estate	51,459.38	23.92
Mekassar Estate	27,748.9	12.9
Leepang A Estate	41,705.06	19.39
Laukin A Estate	25,980.73	12.08
IOI Sister Estates	Tons	Percentage (%)
Shahzan IOI 1 Estate	238.43	0.11
Shahzan IOI 2 Estate	189.16	0.09
Pukin Estate	922.52	0.43
Certified Outsider Crop	Tons	Percentage (%)
Ladang Bebar (Boustead)	1,017.61	0.47
Ladang Sg Jernih (Boustead)	899.12	0.42
Total	215,119.90	100.00

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Table 2: Projected FFB production by supply base for the next reporting period
(September 2019 to August 2020)

CU own estates	FFB Contribution	
	Tonnes	Percentage (%)
Bukit Leelau Estate	25,010	10.5
Detas Estate	46,550	19.61
Merchong Estate	52,920	22.30
Mekassar Estate	31,830	13.41
Leepang A Estate	52,050	21.93
Laukin A Estate	28,960	12.20
Total	237,320	100.00

Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period
(September 2018 to August 2019)

Identity Preserved	Total (MT)
FFB Received	215,119.90
FFB Processed	215,119.90
CPO Production	51,798.42
Certified CPO delivered as RSPO as at 1 Sept 2018	2,708.83
PK Production	9,721.03
CPO delivered as RSPO certified	44,740.98
CPO delivered under other schemes	0.00
CPO delivered as non-RSPO certified	7,792.76
PK delivered as RSPO certified	8,720.37
PK delivered under other schemes	0.00
PK delivered as non-RSPO certified	635.52
Credits traded thru Book & Claim	0.00

Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period
(September 2019 to August 2020)

	Total (MT)
FFB Received	237,320
FFB Processed	237,320
CPO Production	56,005.35
PK Production	10,796.61
CPO delivered as RSPO certified	56,005.35
CPO delivered as non-RSPO certified	0.00
PK delivered as RSPO certified	10,796.61
PK delivered as non-RSPO certified	0.00

Table 5 Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Bukit Leelau Estate	1,946	2,096.00
Detas Estate	2,120	2,225.78
Merchong Estate	1,806	1,934.40
Mekassar Estate	1,128	1,209.39
Leepang A Estate	1,829	2,403.70
Laukin A Estate	1,051	1,619.90
Total	9,880	11,489.17

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Table 6 Planting profile for Bukit Leelau CU

<u>Estate</u>	<u>Year of planting</u>	<u>Planting Cycle</u>	<u>Mature (Ha)</u>	<u>Immature (Ha)</u>	<u>Planted area</u>	<u>% of planted area mature</u>	<u>% of planted area immature</u>
Bukit Leelau	1990	1 st	49		49	2.52	
	1998	1 st	93		93	4.78	
	2014	2 nd	239		239	12.28	
	2015	2 nd	302		302	15.52	
	2016	2 nd		404	404		20.76
	2017	2 nd		430	430		22.10
	2018	2 nd		429	429		22.04
Sub Total					1,946	35.10	64.90
Detas	2009	2 nd	100		100	4.72	
	2010	2 nd	172		172	8.11	
	2011	2 nd	350		350	16.51	
	2012	2 nd	155		155	7.31	
	2013	2 nd	244		244	11.51	
	2014	2 nd	466		466	21.98	
	2015	2 nd	359		359	16.94	
	2016	2 nd		272	272		12.83
	2017	2 nd					
	2018	2 nd		2	2		0.09
					2,120	87.08	12.92
Merchong	2003	2 nd	203		203	11.24	
	2004	2 nd	291		291	16.11	
	2005	2 nd	139		139	7.70	
	2006	2 nd	367		367	20.32	
	2007	2 nd	264		264	14.62	
	2008	2 nd	144		144	7.97	
	2010	2 nd	398		398	22.04	
					1,806	100.00	
Merkassar	2004	2 nd	263		263	23.32	
	2005	2 nd	285		285	25.27	
	2006	2 nd	199		199	17.64	
	2008	2 nd	101		101	8.95	
	2009	2 nd	280		280	24.82	
					1,128	100	
Leepang A	2001	1 st	430		430	23.51	
	2002	1 st	1,399		1,399	76.49	
					1,829	100	
Laukin A	2002	1 st	1,051		1,051	100	
Total					9,880	84.44	15.56

2.3 Organizational Information/Contact Person(s)

The details of the contact person is as shown below:

Name	:	Ravi Tony
Position	:	Sustainability, Safety and Health Manager
Address	:	Sustainability, Safety and Health Department (Peninsular Malaysia), Gomali Estate, KB No 102, 85100, Batu Anam, Segamat, Johor.
Phone no.	:	07-949 7043
Fax no.	:	-
Email	:	ravi.tony@ioigroup.com

RSPO PUBLIC SUMMARY REPORT

3.0 AUDIT FINDINGS

3.1 Changes to certified products in accordance to the production of the previous year

There is no change to the certified products since the last assessment.

3.2 Progress and changes in time bound plan (Refer to Attachment 7 for the time bound plan)

i. Have all the estates under the parent company been certified? Yes No

If no, comments on the organization's compliance with the RSPO partial certification rules :

IOI Corporation Berhad is in progress to certify 5 PMU's from 2019 to 2020 as verified through Time Bound Plan as at 30 June 2019 (refer Attachment 7).

ii. Are there any changes to the organization's time bound plan? Yes No

If yes, comment in terms of acceptance or non acceptance on the changes in the time-bound plan?

iii. Are there associated smallholders (including scheme smallholders) in the CU Yes No

If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its certification? Yes No

If no, please state reasons _____

iv. Any new acquisition which has replaced primary forests or HCV areas Yes No

3.3 Other changes (e.g. organizational structure, new contact person, addresses, etc.)

It has been noted that there were changes in the personnel holding management positions of the company in Aug 2019 i.e. Plantation Controller retired, Estates Manager replacement.

3.4 Status of previous non-conformities * Closed Not closed*

With recurrence in the Minor NCR STK 02 2018 under Indicator 4.1.2, resulting in finding upgraded as Major during this audit.

3.5. Complaint received from stakeholder (if any)

No complaints from stakeholders were observed, except those from workers on the house defect. It has been addressed by the CU accordingly.

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 : Nil

Total no. of major NCR(s)
(details refer to Attachment 4) List : 4.1.2 (Recurrent Minor – Upgraded), 5.1.1 & 6.12.3

4.2 For SC (Details checklist refer to Attachment 5) :

Total no. of minor NCR(s)
(details refer to Attachment 5) List : Nil

Total no. of major NCR(s)
(details refer to Attachment 5) List : D.4.2

5.0 AUDIT CONCLUSION

The audit team concludes that the organization has / ~~has not~~* 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 RECOMMENDATION

No NCR recorded. Recommended to continue certification.

Minor NCR(s) recorded. Corrective action plan has been accepted. Verification of the NCR(s) to be carried out in the next audit.
Note: Minor NCRs raised in the audit which are not addressed in the subsequent audit shall be upgraded to major NCRs .

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.

Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s)..... have not been satisfactorily closed out within 60 days of the audit. Recommended for suspension of the certificate.
Note: Major NCRs which are not addressed within a further 60 days shall result in the certificate being withdrawn.

7.0 IT IS CONFIRMED THAT ALL CORRECTIVE ACTIONS TAKEN ON MAJOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED, ACCEPTED AND VERIFIED AND ALL CORRECTIVE ACTIONS PLANS PROVIDED ON MINOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED AND ACCEPTED. RECOMMENDED FOR CONTINUATION OF RSPO P & C CERTIFICATION.

Audit Team Leader : Selvasingam T Kandiah

(Name)



(Signature)

29/11/2019

(Date)

ANNUAL SURVEILLANCE AUDIT (4) PLAN

1. Objectives

The objectives of the audit are as follows:

- (i) To determine Certification Unit conformance against the RSPO Principles & Criteria Malaysian National Interpretation (MYNI).
- (ii) To verify the effective implementation of corrective actions arising from the findings of last audit.
- (iii) To make appropriate recommendations based on the audit findings.

2. Date of assessment : 26 - 30 August 2019 & 28 Nov 2019

3. Site of assessment : Bukit Leelau Certification Unit;
(i) Bukit Leelau Palm Oil Mill
(ii) Bukit Leelau Estate
(iii) Detas Estate
(iv) Laukin A Estate
(v) Leepang A Estate

4. Scope of certification : Production of Sustainable Crude Palm Oil and Palm Kernel Using the Identity Preserved Supply Chain Model

5. Reference Standards used :
(i) RSPO P&C MYNI:2014
(ii) RSPO Certification Systems, June 2017
(iii) RSPO Supply Chain Standard, 14 June 2017
(iv) Company's audit criteria including Company's Manual/Procedures

6. Assessment team members

Audit Team Leader : Selvasingam T. Kandiah
(i) Auditor : i) Dzulfiqar bin Azmi
ii) Mohd Zulfakar bin Kamaruzaman
iii) Rahayu binti Zulkifli
iv) Suzalina binti Kamalarifin (Supply Chain)

(If there is any objection to the proposed audit team, the organization is required to inform the Lead Auditor/RSPO Section Manager)

7. Audit method

Site audits including observation of practices, interviews with interested parties (all categories of contractors, employees, nearby population, etc.), documentation evaluation and evaluation of records.

8. Audit Findings

Audit findings shall be classified as major and/or minor. Major non conformities shall be addressed within 90 days or else the certificate shall be suspended. If the major non conformities are still not addressed within another 90 days, the certificate shall be terminated.

If there are five or more major non-compliances within one Principle found during the audit, immediate suspension of RSPO certification shall be recommended.

For minor non conformities raised in the surveillance audit, corrective action shall be verified in the next audit. These shall be upgraded to major non- conformities if the corrective actions are not satisfactory implemented in the next audit. For major non conformities raise in the surveillance audit, correction shall be verified in the next audit. Recurring major non- conformities on the same indicator in successive surveillance audits shall result in the immediate suspension of the RSPO P & C certification shall be recommended.

9. Confidentiality Requirements

SIRIM QAS International shall not disclose any information concerning the company regarding all matters arising or coming to its attention with the conduct of the programme, which is of confidential in nature other than information, which is in the public domain.

In the event that there be any legal requirements for disclosing any information concerning the organization, SIRIM QAS International shall inform the organization of the information to be disclosed.

10. Working Language : English and Bahasa Malaysia

11. Reporting

- (i) Language : English
- (ii) Format : Verbal and Written
- (iii) Expected date of issue : 2 weeks after the closure of the Major NC / or if only minor NC, 30 days from the last day of this audit.

12. Facilities required

- a. Room for discussion
- b. Relevant document and record
- c. Personnel protective equipment if required
- d. Photocopy facilities
- e. A guide for each group

13. Assessment Programme Details (as follows):

RSPO PUBLIC SUMMARY REPORT

Date / Time	Coverage of assessment / Activity / Site	STK	MZK	RZ	DA	SK
Date / Time	Coverage of assessment / Activity / Site	STK	MZK	RZ	DA	SK
Day 1-26/08/19 8.30am – 9.15am	Opening Meeting – Venue: Bukit Leelau POM <ul style="list-style-type: none"> 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. 	/	/	/	/	/
9.15am – 12.30pm	<p>Site observation to Bukit Leelau POM P1, P2, P3, P4, P5, P6, P7, P8</p> <ul style="list-style-type: none"> Environment, Occupational safety & health aspects, chemical management HCV & Environment management Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone Environment, Occupational safety & health aspects, chemical management Waste Management Land titles and user rights Laws and regulations Interview with workers, contractors etc. 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 <p>RSPO Supply Chain 2017</p> <ul style="list-style-type: none"> RSPO Supply chain standard implementation including model requirements <p>Site observation to Bukit Leelau Estate P1, P2, P3,P4,P5, P6, P7,P8</p> <ul style="list-style-type: none"> Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, IPM New planting <p>Interview with workers, etc.</p>	/	/	/	/	/
12.30pm – 1.30pm	Lunch Break					
1.30pm – 5.00pm	Continue assessment at respective sites	/	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	STK	MZK	RZ	DA	SK
Day 2 – 27/08/19 8.30am – 12.30pm	<p>Site observation to Detas Estate P1, P2, P3,P4,P5, P6, P7,P8</p> <ul style="list-style-type: none"> Land titles and user rights Laws and regulations 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. 			/		

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	<p>Site observation to Detas Estate P1, P2, P3,P4,P5, P6, P7,P8</p> <ul style="list-style-type: none"> • HCV & Environment management • Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Laws and regulations • Interview with workers, etc. • Environmental management, 		/				
	<p>Site observation to Detas Estate P1, P2, P3,P4,P5, P6, P7,P8</p> <ul style="list-style-type: none"> • Environment, Occupational safety & health aspects, chemical management • Waste Management • Laws and regulations • Interview with workers, contractors etc. 					/	
	<p>Site observation to Detas Estate P1, P2, P3, P4, P5, P6, P7, P8</p> <ul style="list-style-type: none"> • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, • IPM • New planting • Interview with workers, etc. 		/				
12.30pm – 1.30pm	Lunch Break						
1.30pm – 5.00pm	Continue assessment at respective site	/	/	/	/		
Date / Time	Coverage of assessment / Activity / Site	STK	MZK	RZ	DA		
Day 3 – 28/08/19 8.30am – 12.30pm	<p>Site observation to Laukin A Estate P1, P2, P3, P4, P5, P6, P7, P8</p> <ul style="list-style-type: none"> • Land titles and user rights • Laws and regulations • 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. 			/			
	<p>Site observation to Laukin A Estate P1, P2, P3, P4, P5, P6, P7, P8</p> <ul style="list-style-type: none"> • HCV & Environment management • Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Laws and regulations • Interview with workers, etc. 		/				
	<p>Site observation to Laukig A Estate P1, P2, P3, P4, P5, P6, P7, P8</p> <ul style="list-style-type: none"> • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, • IPM • New planting 	/					

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	<ul style="list-style-type: none"> Interview with workers, etc 					
	Site observation to Laukin A Estate P1, P2, P3, P4, P5, P6, P7, P8 <ul style="list-style-type: none"> Environment, Occupational safety & health aspects, chemical management Waste Management Laws and regulations Interview with workers, ESH committee, contractors etc. 				/	
12.30pm – 1.30pm	Lunch Break					
1.30pm – 5.00pm	Continue assessment at respective site	/	/	/	/	
Date / Time	Coverage of assessment / Activity / Site	STK	MZK	RZ	DA	
Day 4 – 29/08/19 8.30am – 12.30pm	Site observation to Bukit Leelau Estate P1, P2, P3, P4, P5, P6, P7, P8 <ul style="list-style-type: none"> Environment, Occupational safety & health aspects, chemical management Waste Management Laws and regulations Interview with workers, ESH committee, contractors etc. 				/	
	Site observation to Bukit Leelau Estate P1, P2, P3, P4, P5, P6, P7, P8 <ul style="list-style-type: none"> Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, IPM New planting Interview with workers, etc 	/				
	Site observation to Bukit Leelau Estate P1, P2, P3,P4,P5, P6, P7,P8 <ul style="list-style-type: none"> Land titles and user rights Laws and regulations 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. 			/		
	Site observation to Bukit Leelau Estate P1, P2, P3,P4,P5, P6, P7,P8 <ul style="list-style-type: none"> HCV & Environmental management Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone Laws and regulations Interview with workers, etc. 		/			
12.30pm – 1.30 pm	Lunch Break					
1.30pm –5.00pm	Continue assessment at respective site	/	/	/	/	
Date / Time	Coverage of assessment / Activity / Site	STK	MZK	RZ	DA	
Day 5 – 30/08/19 8.30am – 12.30pm	Site observation to Leepang A Estate P1, P2, P3,P4,P5, P6, P7,P8					

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	<ul style="list-style-type: none"> HCV & Environment management Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone Laws and regulations Interview with workers, etc. <p>Site observation to Leepang A Estate P1, P2, P3,P4,P5, P6, P7,P8</p> <ul style="list-style-type: none"> Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, IPM New planting Interview with workers, etc 		/			
	<p>Site observation to Leepang A Estate P1, P2, P3,P4,P5, P6, P7,P8</p> <ul style="list-style-type: none"> Environment, Occupational safety & health aspects, chemical management Waste Management Laws and regulations Interview with workers, ESH committee, contractors etc. 				/	
	<p>Site observation to Leepang A Estate P1, P2, P3,P4,P5, P6, P7,P8</p> <ul style="list-style-type: none"> Land titles and user rights Laws and regulations Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the mill <p>Interview with gender committee, safety committee, worker representative, contractors, supplier, etc.</p>			/		
12.30pm – 2.30 pm	Lunch Break					
2.30pm –4.00pm	Continue assessment at respective site	/	/	/	/	
4.00pm – 5.00pm	Closing meeting at Leepang A Estate	/	/	/	/	

Special audit : 28/11/2019
Auditor : Suzalina Kamaralariffin
Topic for audit :
1) Production data of Bt. Leelau POM
2) Overproduction

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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, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	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	There is evidence that Bukit Leelau CU provides adequate information on relevant social issues upon request to its stakeholders.
	1.1.2	Records of requests for information and responses shall be maintained. Major Compliance	YES	There is evidence that the Bukit Leelau CU keeps and maintains requests for information and responses. These were kept and maintained in the respective files.
C 1.2 Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.	1.2.1	Land titles/user rights	YES	The land title and user rights of all units being audited are available and verified. Please cross-refer to Indicator 2.2.1 for details.
		Occupational health and safety plans	YES	Occupational health and safety plans were available. Please cross-refer to Indicator 4.7.1 for details.
		Plans and impact assessments relating to environmental and social impacts	YES	The social impact assessment (SIA) for Bukit Leelau CU was revised in August 2017 and each unit reviews the SIA annually. Each unit has its own 'Social Impact Assessment, Management Action Plans and Continuous Improvement Plans. Please cross-refer to Indicator 6.1.1 for details.
		HCV documentation summary	YES	Management of HCV Areas and Monitoring of HCV Areas' dated August 2019. Please cross-refer to Indicators 5.2.1 & 5.2.2 for details.
		Pollution prevention and reduction plans	YES	Waste management and disposal plan to avoid or reduce pollution had been documented and implemented. Please cross-refer to Indicator 5.3.1 for details.
		Details of complaints and grievances	YES	Details of complaints can be found in the respective Complaints/Grievance Book/Request.
		Negotiation procedures	YES	Negotiation Procedure exists under SOP 2.0 & 6.0 Appendix 2.

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Clause	Indicators		Comply Yes/No	Findings
		Continual improvement plans	YES	Continuous improvement plans for Bukit Leelau CU had been established and updated accordingly by Bukit Leelau CU management and Executives from the Sustainability Department. Each unit within the Bukit Leelau CU has its own Continuous Improvement Plan which is updated on an annual basis. These include plans to build new houses for workers at Bukit Leelau Mill, and build a volleyball court and improve landscaping at the workers' housing at Detas Estate.
		Public summary of certification assessment report;	YES	The public summary of certification assessment report of Bukit Leelau CU had been published in the SIRIM QAS International website.
		Human Rights Policy	YES	Bukit Leelau Human Rights Policy contained its 'Sustainable Palm Oil Policy' dated March 2018, under the title Respecting Human Rights.
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	A policy entitled 'Code of Business Conduct & Ethics' dated in May 2015 is available and verified.

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	YES	Based on samples taken, there is evidence that the Bukit Leelau CU has demonstrated its compliances to legal requirements. Among those sampled were the Company's compliance with the Factory & Machinery Act 1967, EQ (PP) CPO Reg. 1977, EQ (SW) Reg. 2005, OSH Act, Employees' Social Security Act 1969, Employment Act 1955, Minimum Wage (Amendment) Order 2018, Employment Insurance System Act 2017, and Minimum Standard of Workers' Housing and Amenities Act 1990. Compliances under these statutes were cross-checked against the workers' salary slips, employment contracts, interviews and field observations.
	2.1.2	A documented system, which includes written information on legal requirements shall be maintained. Minor Compliance	YES	The Bukit Leelau CU continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that were applicable to them. Each estate and mill had its own Legal and Other Requirements Register (LORR) and were being evaluated annually and individually for compliance.
	2.1.3	A mechanism for ensuring compliance shall be implemented. Minor Compliance	YES	The CU maintained its mechanism for ensuring that all applicable legal requirements were implemented. The mechanism was by the implementation of internal audit by its Sustainability Team through evaluation of compliance exercise against the legal register.

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Clause	Indicators		Comply Yes/No	Findings
	2.1.4	A system for tracking any changes in the law shall be implemented. Minor Compliance	YES	The system for tracking changes is defined in "Mechanism of Tracking Law Changes" flowchart. The Sustainability Department is responsible to track any change in the law.
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, customary or user rights.	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	All the visited operating units have the copies of their land titles kept at their administration office. Bukit Leelau CU owned the land as it was leased and bought from the previous land owner, the Pahang State Government. Based on the interviews held with local communities from Kg Gandak, Kg Runchang and Kg Menchupu, it was confirmed that there is no case concerning the rights of local communities and indigenous peoples. The Bukit Leelau POM premises are located within Bukit Leelau Estate land title. The land titles are issued under the names of Perusahaan Mekassar (M) Sdn Bhd, and the land title specifies land use to be for oil palm.
	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	On Bukit Leelau Cu there was evidence that physical markers are located and visibly maintained along the legal boundaries.
	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 observed during the audit, there has not been any records of any dispute involving Bukit Leelau CU and any third parties. As such, there is no requirement for payment of any compensation to any third parties.
	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 observed during the audit, there has not been any records of any dispute involving Bukit Leelau CU and any third parties. As such, there is no requirement for payment of any compensation to any third parties.
	2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties. Minor Compliance	YES	As reported in 2.2.1, it has been verified that there is no conflict or dispute over the land.

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Clause	Indicators		Comply Yes/No	Findings
	2.2.6	To avoid escalation of conflict, 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	YES	As observed during the audit, there has not been any records of any dispute involving Bukit Leelau CU and any third parties. There has been no evidence of any occurrence of any instigation of violence involving Bukit Leelau CU.
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, prior, and informed consent.	2.3.1	Maps of an appropriate scale showing the extent of recognised legal, customary or user rights shall be developed through participatory mapping involving affected parties. Major Compliance	YES	As observed during the audit, there has not been any records of any dispute involving Bukit Leelau CU and any third parties. As such, there is no requirement for any map showing extent of recognised legal, customary or user rights done in a participatory way with any affected parties.
	2.3.2	Copies of negotiated agreements detailing the process of FPIC shall be available and shall include:		
	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;	YES	As observed during the audit, there has not been any records of any dispute involving Bukit Leelau CU and any third parties. As such, no consultation and discussion had been held with any affected groups.
	b)	Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken;	YES	As observed during the audit, there has not been any records of any dispute involving Bukit Leelau CU and any third parties. As such, no negotiated agreements detailing any FPIC process is available.
	c)	Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities,	YES	As observed during the audit, there has not been any records of any dispute involving Bukit Leelau CU and any third parties. As such, no negotiated agreements detailing any FPIC process is available.

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Clause	Indicators		Comply Yes/No	Findings
		including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. Minor Compliance		
	2.3.3	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 observed during the audit, there has not been any records of any dispute involving Bukit Leelau CU and any third parties. As such, no relevant information is available for any affected parties.
	2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. Major Compliance	YES	As observed during the audit, there has not been any records of any dispute involving Bukit Leelau CU and any third parties. As such, no evidence to show any communities being represented by their own representatives.

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

Clause	Indicators		Comply Yes/No	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	As per all IOI Corporation Berhad, Bukit Leelau CU continued to have documented business plans with projections until the financial year 2023/2024. At the estates, the budget provisions covered activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO compliance, etc. Attention was given to crop projection, cost of production, cost per ton and per hectare indicators to monitor the performance of each operating unit. The cost of production was reviewed and compared against expenditure each year with projections in place for future years.
	3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, shall be available. Minor Compliance	YES	Bukit Leelau CU had a Long Range Replanting Program up to 2028/2029. The program was reviewed annually. As such there is no replanting for the next 5 years in all estates visited. The last replanting is in 2019 (183Ha - Ex 1990 planting) on Bukit Leelau Estate.

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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.	4.1.1 Standard Operating Procedures (SOPs) for estates and mills shall be documented. Major Compliance	YES	Bukit Leelau CU adopted the following documented manuals and documents as their standard operating procedures: 1. Group Standard Operating Procedures (StOP) Oct 2018 2. Safe Operating Procedure (SaOP) 3. Group Environmental Impact Assessment and Management Action Plans (GEIA) 4. IOI Group Policy Documents. 5. Oil Palm Agricultural Policy (OPAP) July 2005
	4.1.2 A mechanism to check consistent implementation of procedures shall be in place. Minor Compliance	NO	On Estates the managers were accountable to check on consistent implementation of procedures. It was also by: i. Periodic reporting from operating units ii. On site visits, inspections and discussions with relevant personnel iii. Assessments and audits like Internal Audits, PA visits and by RSPO Audits iv. Consultation with RSPO team & management. The implementation of SOPs were evident however, it was found during the audit that the contents of the following paragraphs conflict with each other: a. IOI Group Sustainable Palm Oil Policy revised in March 2018 (under paragraph Human Rights and Workplace), states that IOI Group commits to “eliminate all forms of illegal, forced, bonded, compulsory... labor ...” b. Paragraph 3e) of New/Amended Terms and Conditions of Employment Contract states that “The Employee undertakes to work with the Employer for 3 years...”, whereas paragraph 12 d) states that “The Employee may terminate this contract by giving 14 days’ notice...” c. Paragraph 12e) Offer of Employment as Plantation Worker states that “The Employee undertakes to work with the Employer for 3 years...”, whereas paragraph 3 d) states that “The Employee may terminate this contract by giving 14 days’ notice...” d. Paragraph 9 of the Employee Declaration states “I guarantee to work with the Company for at least 3 years”. Therefore, a Major Non-Compliance RZ 01 2019 was issued.
	4.1.3 Records of monitoring and any actions taken shall be maintained and available, as appropriate. Minor Compliance	YES	The Estates and Mill in Bukit Leelau CU continued to maintain records of monitoring and any actions taken. Most records are being maintained for more than a year and some much longer.
	4.1.4 The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). Major Compliance	YES	The Mill does not receive any uncertified FFB since this Mill is under Identity Preserved Model. However, recently it purchased RSPO-certified FFB from Boustead Plantations, namely from Bebar Estate and Ladang Sg Jerneh Estate. The Purchase Forms contain date and time FFB was received, name of estate, ticket numbers, vehicle numbers, gross tonnage, tare, nett and OER%.
C 4.2	4.2.1 There shall be evidence that		Bukit Leelau CU continued to practise the maintenance of long-term soil fertility by annual

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Clause	Indicators	Comply Yes/No	Findings
Practices maintain soil fertility at or, where possible, improve oil fertility to a level that ensures optimal and sustained yield.	good agriculture practices, as contained in SOPs, are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. Minor Compliance	YES	application of fertilizer based on periodic foliar and soil analysis, biomass retention (pruned fronds left to decompose in the fields), EFB application and solid POME application in some fields. During replanting palms were felled, chipped, windrowed and left to decompose in the field. Fertiliser application, which was of paramount importance for maintenance of soil fertility, was carried based on the recommendation made by the Agronomist of IOI Research Centre located in Gemencheh, Batang Melaka, Negeri Sembilan.
	4.2.2 Records of fertiliser inputs shall be maintained. Minor Compliance	YES	All 4 Estates visited had continued to maintain records of fertilizer inputs. Some of the records sighted were cost book, Fertilizer Application monitoring forms, etc. Records of programs and applications of fertilizers were made available to auditors. Records sighted showed that actual applied in 2018 was in line with program in all estates
	4.2.3 There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. Minor Compliance	YES	From the Agronomist reports it was established that in all estates annual foliar and soil sampling to monitor changes in nutrient status had been carried out.
	4.2.4 A nutrient recycling strategy shall be in place, and may include use of EFB, POME, and palm residues. Minor Compliance	YES	All 4 Estates visited had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field, EFB mulching and application of Solid POME. In addition, during replanting, palms were felled, chipped, windrowed and left to decompose.
C 4.3 Practices minimise and control erosion and degradation of soils.	4.3.1 Maps of any fragile/marginal soils shall be available. Major Compliance	YES	Based on the soils maps, there were no fragile/marginal soils in all estates except on Bukit Leelau Estate which had 89.63 Ha in Block PM 98 of peat soils. The soil maps came with description of the soils characteristics such as texture, depth, drainage, parent material and key aspect for management. The soil series were classified as follows:
	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	All Estates visited in Bukit Leelau CU had continued to comply with the management strategy in place for planting on slopes and to minimize and control erosion and degradation of soils. In all 4 Estates visited undulating and hilly areas were terraced. It was also observed that practices to minimize and control erosion and degradation of soils were also advocated through proper stacking of fronds, EFB application, avoidance of blanket spraying, road maintenance and maintenance of soft vegetation in interlines. No bare ground was sighted during the visit.
	4.3.3 A road maintenance programme shall be in place. Minor Compliance	YES	During the field visit, it was noted that the road conditions were well maintained in all estates. Accessibility were made possible by regular maintenance guided by its road maintenance programs. The program had been supported by adequate provisions in the budgets. Surface run off water from roads were well directed into fields and drains with well cambered roads and road sided drains.
	4.3.4 Subsidence of peat soils shall be minimised and monitored. A documented water and	YES	Bukit Leelau Estate had 89.63 Hectares of peat soils in 5 separate blocks in Block 1998 as shown in the soil map. It was observed during the visit to the peat areas in Bukit Leelau Estate that Water level markers (at 6 places) to measure water levels in drains and piezometers (6

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Clause	Indicators		Comply Yes/No	Findings
		ground cover management programme shall be in place. Major Compliance		units) to measure ground water levels had been installed and records of readings had been maintained. Water management was carried out using sand bag bunds and water markers.
	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	The only plantings on peat soils are on Bukit Leelau Estate and are not due for replanting now. Hence, the drainability assessments were not necessary and not yet conducted.
	4.3.6	A management strategy shall be in place for other fragile and problem soils. Minor Compliance	YES	The management strategy available for peat soil in Bukit Leelau Estate.
C 4.4 Practices maintain the quality and availability of surface and ground water.	4.4.1	An implemented water management plan shall be in place. Minor Compliance	YES	Bukit Leelau CU Water Management Plan has been reviewed annually and latest updated in Aug 2019. The water management plans contain soil water abstraction, treatment, storage, monitoring, conservation, pollution prevention, wastewater treatment and discharge as well as domestic usage. Domestic usage was monitored using flow meters in Bukit Leelau CU. Though there was no shortage of water for domestic use in all estates, awareness was created among the workers and staff to save water through verbal reminders. Water spillage during pre-mixing of chemicals, from washing of PPE and from triple rinsing was collected from in sumps and recycled for spraying.
	4.4.2	Protection of water courses and wetlands, incl. maintaining and restoring appropriate riparian and other buffer zones shall be demonstrated. Major Compliance	YES	Bukit Leelau Estate, Detas Estate, Leepang A Estate and Laukin A Estate had continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along all natural waterways within the estate.
	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	ETP is available at BLPOM to treat the POME. According to DOE's license, the disposal method of the final discharge is through waterflow irrigation – Sg. Serian. The ETP was regularly maintained by desludging of the ponds to ensure its efficiency. Final discharge samples were taken on monthly basis and sent to an accredited laboratory for analysis. The results of analysis were submitted to the DOE on quarterly basis. All parameters were within the regulatory limit BOD discharged to land irrigation was below than 100 mg/l.
	4.4.4	Mill water use per tonne of FFB shall be monitored. Minor Compliance	YES	Processing water obtained from water catchment area, the use of water in the mill was monitored accordingly.

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Clause	Indicators		Comply Yes/No	Findings
C 4.5 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.	4.5.1	Implementation of IPM plans shall be monitored. Major Compliance	YES	All 4 Estates, Bukit Leelau, Detas, Laukin A & Leepang A, continued to have a documented IPM system in place at all estates. The IPM program among others included pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and wild boar. The IPM technique for rats included rearing barn owls (<i>tyto alba</i>), bagworm control included the planting of beneficial plants such as <i>Cassia cobanensis</i> , <i>Antigonon leptopus</i> and <i>Turnera sublata</i> and for rhinoceros beetles was by using pheromone trap. The implementation was monitored by rat damage, bag worm attack, barn owl population census and records on planting beneficial plants. The major pest attack is by bagworms in both estates. Attack in young palms field was treated.
	4.5.2	Training of those involved in IPM implementation shall be demonstrated. Minor Compliance	YES	Records showed that training of those involved in IPM implementation was carried in Bukit Leelau CU. Among the training sighted were Barn Owl Management and Rat Census & Baiting, conducted between Aug 2018 and Aug 2019.
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 all pesticides used had been documented in Standard Operating Procedure on Sustainability. The use of selective products that are specific to the targeted weed had been demonstrated in the Group Standard Operating Procedure.
	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	All estates, Bukilt Leelau, Detas, Laukin A and Leepang A, continued to maintain records on the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, and Ai/Ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, cost books and in 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	Bukit Leelau CU continued to have a Pesticide reduction Plan and Chemical & Fertilizer Reduction Plan. The estates continued to plant nectariferous beneficial plants (<i>Cassia cobanensis</i> , <i>Antigonon leptopus</i> and <i>Turnera sublata</i>) as part of the IPM plan. Nurseries were available for continuous planting to reduce use of insecticides on bagworms and for control of rats included rearing barn owls (<i>tyto alba</i>). EFB was applied in single layers in order to prevent the breeding of Rhinoceros beetles. In flat and undulating areas where Oil Palm had been planted on un-terraced areas, harvesting paths were grass cut to control noxious weeds. Furthermore, spraying of weeds was carried out as programmed and control of other leaf using pesticides only when pest outbreak was above thresh hold levels.
	4.6.4	Pesticides that are		All pesticides used were those officially registered under the Pesticide Act 1974. Bukit Leelau

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Clause	Indicators	Comply Yes/No	Findings
	<p>categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam 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 and the relevant provision; and in accordance with USECHH Regs. Minor Compliance</p>	YES	<p>CU had used Class 2, Class 3 & Class 4 pesticides. There were no class I chemicals in all 4 Estates visited, No illegal agrochemicals (stated by local and international laws) in particular paraquat were used or found.</p>
4.6.5	<p>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 application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers. Major Compliance</p>	YES	<p>Records showed that pesticides were handled, used and applied by trained personnel and as per the SDS of the pesticide, CHRA and SOPs. The staff and workers such as the storekeepers, sprayers, workers applying fertilizer and rat baits were trained. Random interviews conducted showed that they understood the hazards involved and the usage and handling of chemicals in a safe manner. The trade and generic names of the chemicals were made known to the workers through trainings.</p>
4.6.6	<p>Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for</p>	YES	<p>The storage of pesticides at Bukit Leelau Estate, Detas Estate, Leepang A Estate and Laukin A Estate was found 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.</p>

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Clause	Indicators	Comply Yes/No	Findings
	other purposes. Pesticides shall be stored in accordance to the Occupational Safety and Health Act 1994 and Regulations and Orders, Pesticides Act 1974 and Regs. Major Compliance		
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. Minor Compliance	YES	The application of pesticides was guided by CHRA, SDS of the Chemical and the Safe Operating Procedure. In addition to the Safety Procedures, Safety Data Sheet information of each chemical had been made known through training with emphasis on its danger, precautionary measures to be observed including the use of PPE.
4.6.8	Pesticides shall be applied aerially only where there is doc 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 in Bukit Leelau Estate, Detas Estate, Laukin A Estate and Leepang A Estate and there was no evidence to show that any had been carried out.
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	The staff and workers such as the storekeepers, sprayers and workers applying fertilizer were continuously trained. The trainings were regularly conducted by the estate management to enhance knowledge and skills of employees. The training included the safety aspects and usage of PPE. Records of training were maintained for verification.
4.6.10	Proper disposal of waste material, according to procedures that are fully-understood by workers & mgrs shall be demonstrated. Minor Compliance	YES	Standard Operating Procedure "Scheduled Wastes", has been established under OSH Management System. The documentation and identification of all waste product such as scheduled wastes, domestic wastes, clinical wastes, recyclable wastes such as metal, tins, plastics, bottles, mill wastes and polluting material. Disposal of empty pesticide containers were carried out as per established procedures. Triple rinsing procedures was continually implemented for empty pesticide containers.
4.6.11	Annual med. surveillance for pesticide op., doc action to treat related health conditions, shall be demonstrated. Major Compliance	YES	Records of annual medical surveillance for Bukit Leelau CU were available and reviewed during the conduct of audit.

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Clause	Indicators		Comply Yes/No	Findings
	4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. Major Compliance	YES	No work with pesticides undertaken by pregnant or breast-feeding women, hence the evident through medical surveillance report that the workers had gone through, none of them were female.
C 4.7 An occupational health and safety plan is documented, effectively communicated and implemented. The occupational health and safety plan shall cover the following:	4.7.1	An occupational health and safety policy shall be in place. An occupational health and safety plan covering all activities shall be documented & implemented, and its effectiveness monitored. Major Compliance	YES	Occupational health and safety Policy had been established for new revision and endorsed by the Plantation Director on April 2019. The policy had been communicated to all levels of the organization through briefings and also being displayed prominently in Bahasa Malaysia and English on notice boards at mill and estate office and Muster Ground. Random interviews with employees showed that they generally understood the basic requirements of the policy and the Safe Operating Procedure. The visited sites showed that the OSH rules were adhered to by employees such as wearing of PPE and following safety signages.
	4.7.2	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be doc & implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. Major Compliance	YES	The hazard identification, risk assessment and risk control (HIRARC) procedure has been established. Bukit Leelau CU have conducted the risk assessment on all its operation as well as determining their control measures.
	4.7.3	All workers involved in the operation shall be adequately trained in safe working practices. Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, & land preparation, harvesting and, if it is used, burning. Major Compliance	YES	Safe working practices training to all workers involved in field operations were given as mentioned above in 4.7.1 and in criterion 4.8.
	4.7.4	The responsible person/s shall be identified. There shall be records of regular	YES	The mill manager and the estate manager had overall responsibilities of safety and health issues, with the assistance of the Sustainability Management of IOI Plantation. Records of regular meetings between the responsible person and workers to discuss about health and

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Clause	Indicators		Comply Yes/No	Findings
		meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. Major Compliance		safety had been verified to the satisfactory maintained.
	4.7.5	Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. Minor Compliance	YES	EERP was established. Copies of procedures and telephone numbers were sighted on notice boards and muster grounds. Among of procedure of ERP Document, were ERP for Accidents & Dangerous Occurrences Notification, ERP for Physical Injury, ERP for Chemical Spillage, ERP for Vehicle Accident, ERP for Fire Outbreak, ERP for Major Spillage, ERP for Fire in Field & ERP for Chemical Poisoning – Highly Toxic Pesticides (Store/Field). Telephone numbers and names of the members of the Emergency Response Team (ERT) were communicated to all employees and displayed at notice boards. Telephone numbers of the PIC, Police Station, Fire Brigade, and <i>Klinik Kesihatan</i> were also included.
	4.7.6	All workers shall be provided with medical care, and covered by accident insurance. Minor Compliance	YES	Local & Foreign workers are covered by SOCSO (Pertubuhan Keselamatan Sosial). The “Jadual Caruman Bulanan” were sampled for several workers accordingly.
	4.7.7	Occupational injuries shall be recorded using LTA metrics. Minor Compliance	YES	Sighted the Bukit Leelau CU has maintained and updated the LTI Summary by monthly basis.
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, that incl. regular assessments of training needs documentation of the prog. Major Compliance	YES	A documented formal training programme ‘Sustainability Program for the Year 2019 and records that covered aspects of RSPO Principles and Criteria was made available to the auditors. The 2019 training program covered the assessment for training needs and formal training program for Standard Operating Procedures of estate operations like harvesting standards, pruning standards, manuring, weeding, etc. had been covered.

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Clause	Indicators	Comply Yes/No	Findings
	4.8.2 Records of training for each employee shall be maintained. Minor Compliance	YES	Training records for each worker are kept according to the types of training carried out. This is contained in the Workers' Training Summary and updated as and when the trainings are conducted.

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

Clause	Indicators	Comply Yes/No	Findings
C 5.1 Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.	5.1.1 An environmental impact assessment (EIA) shall be documented. Major Compliance	NO	Bukit Leelau CU has established its environmental aspects / impacts register associated with their activities. Environmental aspect and impact (EAI) which covers from upstream activities such as FFB reception until downstream processes was sighted during assessment. Established for May 2016 to May 2020. Latest reviewed at Bukit Leelau POM on May 2019. Identification and evaluation of environmental impact was done for all activities and processes related to the mill operation. Among the most significant environmental receptors are the boiler stack emission which associated with air emission, palm oil mill effluent (POME) discharge and land contamination which related to managing the schedule waste and general waste. For Bukit Leelau CU estates, latest environment aspect impact assessment was reviewed on August 2019 covering all activities. For the estate operation, all activities from harvesting, pest and disease, upkeep programmed until delivery to mill has been identified. However, transportation of fertilizers and chemical for spraying activities to the field have not been assessed in the environment impact assessment (EIA) report. Therefore, Major NCR DA 01 2019 was raised.
	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 identify the responsible person/s. Minor Compliance	YES	Significant environmental impact was derived from the environmental impact assessment evaluation. Those activities evaluated as significant were then monitored using the management control and mitigation measure established for each activity where the significant impacts occurred. The management has periodically reviewed the implementation and effectiveness of the established program.
	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	YES	The CU Environmental Impact Assessment, Management Action Plans & Continuous Improvement Plans' to monitor the effectiveness of the mitigation measures taken, are in place. Performance and records has been verified by auditor, noted to be satisfactory

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Clause	Indicators		Comply Yes/No	Findings
		measures. The plan shall be reviewed as a in. every 2 yrs to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. Minor Compliance		
C 5.2 The status of rare, threatened or endangered species other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.	5.2.1	Information shall be collated in a HCV assessment that includes both the planted area itself and relevant wider landscape - level considerations. Major Compliance	YES	Based on the HCV Assessment report updated in Aug 2019, the HCV areas for each estates were provided and it was confirmed that the overall total is 22.66 Ha.
	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	The CU has established an action plan for HCV area titled 'Management of HCV Areas and Monitoring of HCV Areas' dated August 2019. Among the programme are listed as below: <ol style="list-style-type: none"> 1. Regular monitoring patrols at stream and ponds to maintain buffer zones and prevent vegetation clearances at buffer zones. 2. Regular Monitoring patrols at worshipping areas 3. Regular Monitoring patrols to maintain the forest boundary 4. Regular monitoring patrols cemetery. 5. Steep Hill monitoring by patrolling 6. Regular Monitoring patrols on peatland to ensure proper peatland hydrology besides prevent natural fire caught in the peat land.
	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, harm, collect or kill these species. Minor Compliance	YES	Awareness training pertaining HCV and RTE were provided to staff and workers. Among other, the training contain information about legal and disciplinary actions if found guilty. All the visited estates will conduct training programme on HCV and ERT by annually.
	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	YES	There were no RTE reported present in the supply bases. However, the supply bases continued implement action plans such as to conserve the identified areas, boundary monitoring, and buffer zone awareness to staff and workers.

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Clause	Indicators	Comply Yes/No	Findings
	be documented and reported; Outcomes of monitoring shall be fed back into the action plan. Minor Compliance		
	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 was no HCV observed set-aside due to existing rights of local communities at Bukit Leelau, Detas, Laukin A and Leepang.
C 5.3 Waste is reduced, recycled, re-used, and disposed of in an environmentally and socially responsible manner.	5.3.1 All waste products and sources of pollution shall be identified and documented. Major Compliance	YES	All waste products and sources of pollution identified and documented through “Waste Management Plan & Reduction Plan for the Year 2019” in the Environmental Management Plan that applicable for both mill and estates. The waste management plan has also identified source of waste products/pollutants, waste generation, action plan & monitoring, documents to be reviewed, management review, comments & time bound and person in charge. Other sources of pollutions are also listed in the plan such as workshop, line-site, office, store, canteen, effluent pond, boiler.
	5.3.2 All chemicals and their containers shall be disposed of responsibly. Major Compliance	YES	Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticide containers was punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. Inventory and consignment documents verified for confirmation of proper management and disposal. The scheduled wastes generated at Bukit Leelau CU not more than 180 days @ 20mt.
	5.3.3 A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. Minor Compliance	YES	Waste management and disposal plan to avoid or reduce pollution had been documented and implemented as discussed in Indicator 5.1.3 above. Procedures and guideline were used to guide the waste disposal activities and to reduce pollution on the routine operation. In the sampled estates, the waste management program and plan seen incorporated with environmental impact assessments and environmental management plan. The assessment seen effectively covers on nursery, replanting area, matured & immature maintenance, FFB collection, workshop, schedule waste / chemical / fertilizer store, tractor parking, water pump house, landfill and etc. Sampled the EFB collection from mill and the area/filed mulched.
C 5.4 Efficiency of fossil fuel use and the use of renewable energy is optimised.	5.4.1 A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. Minor Compliance	YES	A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the Environmental Impact Assessment, Management Action Plans & Continuous Improvement Plans, identified in the following: To Reduce Diesel usage – by maintenance of the boiler & machineries to ensure at optimum level, to monitor diesel usage, provide training to workers regarding reduce fuel and diesel usage for boiler.

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Clause	Indicators		Comply Yes/No	Findings									
C 5.5 Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice	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	IOI Plantation had established and documented a Zero Burning Policy. The policy dated May 2018 was signed by the Plantation Director. The policy advocated compliance to the Malaysian Environment Quality Act 1974 (EQA 1974) and ASEAN Policy on Zero Burning 2003. All estates visited had not practiced any opening burning and there was no evidence to show that fire had been used for preparing land for replanting on Bukit Leelau Estate in the 2019 Replanting area.									
	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 Impl. of the ASEAN Policy on Zero Burning' 2003. Minor Compliance	YES	On the 2019 replanting on Bukit Leelau Estate there was no evidence to show that fire had been used for preparing land. All palms had been felled, chipped, windrowed and left to decompose. .									
C 5.6 Preamble Growers and millers commit to reporting on operational GHG emissions. However, it is recognised that these significant emissions cannot be monitored completely or measured accurately with current knowledge and methodology. It is also recognised that it is not always feasible or practical to reduce or minimise these emissions. Growers and millers commit to an implementation period until the end	5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent.	YES	Monitoring of mill gas emission is being done online using the Continuous Emission Monitoring System (CEMS) and supported by Ringelmann Smoke Charts. Report show evidence that the emission is within the permissible limits of DOE as verified by document made available during on site visit to the BLPOM. POME treatment, monitoring and land application is monitored, maintained and adhere to DOE requirement. Stack emission and boiler ashes were maintained and monitored at mill. Regular reporting of twice yearly was carried out and report made available during the audit.									
	5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. Major Compliance	YES	IOI Group had identified emission of GHG from their operations such as emission from their farm tractor and gen set operation. The management from all estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adverse impact the environment.									
	5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. Minor Compliance	YES	The CU had used RSPO Palm GHG version 4.0.1 Calculator as a tool to calculate the GHG emissions. The Bukit Leelau CU has used option 2 full version to calculate the data. Sighted report sends to RSPO on 24/08/2019. The input data was verified and the following were determined: <table border="1" data-bbox="1064 1161 1518 1396"> <thead> <tr> <th>Description</th> <th>tCO₂e/tProduct</th> </tr> </thead> <tbody> <tr> <td>CPO</td> <td>1.31</td> </tr> <tr> <td>PK</td> <td>1.31</td> </tr> <tr> <th>Production</th> <th>t/yr</th> </tr> <tr> <td>FFB Processed</td> <td>189172.64</td> </tr> </tbody> </table>	Description	tCO ₂ e/tProduct	CPO	1.31	PK	1.31	Production	t/yr	FFB Processed
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Clause	Indicators	Comply Yes/No	Findings																																
<p>of December 2016 for promoting best practices in reporting to the RSPO, and thereafter to public reporting. Growers and millers make this commitment with the support of all other stakeholder groups of the RSPO.</p> <p>Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</p>			<table border="1"> <tr> <td>CPO Processed</td> <td>44528.94</td> <td colspan="2"></td> <td colspan="2"></td> </tr> </table>				CPO Processed	44528.94																											
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Clause	Indicators		Comply Yes/No	Findings			
				Crop Sequestration	-92633.64	-9.32	-0.49
				Conservation Sequestration	0.00	0.00	0.00
				Total	31159.33	3.15	0.16
				Palm Oil Mill Effluent (POME) Treatment			
				Diverted to compost		0%	
				Diverted to anaerobic digestion		100%	
				Diverted to Anaerobic Digestion			
				Diverted to anaerobic pond		100%	
				Diverted to methane capture (flaring)		0%	
				Diverted to methane capture (electricity generation)		0%	

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, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.	6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. Major Compliance	YES	Revised Social Impact Assessments for the Mill and each Estate within the Bukit Leelau CU has been carried out and SIA Reports produced. Each unit within the Bukit Leelau CU has its own Revised Social Impact Assessment (SIA). Records of stakeholder meetings were all documented, reviewed and verified during the audit. Each SIA was conducted through participatory method involving all relevant affected parties and stakeholders.
	6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. Major Compliance	YES	It was evident that the SIA was done with the participation of affected parties as evidenced from the meeting minutes.
	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, including responsibilities for implementation. Major Compliance	YES	The plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified were developed in consultation with the affected parties. This was evidenced by the minutes of stakeholder consultations sighted during the audit. The plan is timetabled and entitled '2019 Social Impact Assessment And Time Bound Plan Effective Oct 2018', and identifies the persons responsible for implementation.

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Clause	Indicators	Comply Yes/No	Findings	
	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	There is evidence that the action plan is being reviewed annually and it was evident that that the review was conducted with the participation of the affected parties.
	6.1.5	Particular attention shall be paid to the impacts of smallholder schemes. Minor Compliance	YES	There is no smallholder schemes at the Bukit Leelau CI and therefore, this Indicator is not applicable.
C 6.2 There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties	6.2.1	Consultation and communication procedures shall be documented. Major Compliance	YES	Consultation and communication procedure is available and documented under SOP 2.0 & 6.0 Appendix 2 and is applicable to employees, stakeholders, public, etc. Consultation and communication procedure for Bukit Leelau CU is outlined in 'Stakeholder Request Procedure', 'Grievances Reporting Flow Chart' and 'Grievance Procedure For Land Owner Issues'. These documents were made available during the audit.
	6.2.2	A management official responsible for these issues shall be nominated. Minor Compliance	YES	Each Estate and Mill under Bukit Leelau CU have appointed its own Social Liaison Officer. Their responsibilities include addressing issues related to social aspects from all the affected 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 parties, and records of actions taken in response to input from stakeholders, shall be maintained. Minor Compliance	YES	Stakeholder lists for all the units under Bukit Leelau CU were all available and sighted during the audit, and updated as of 2019. They each comprise relevant government agencies such the Department of Environment, the Labour Office, Department of Wildlife and National Parks, PERKESO, canteen operators, contractors, suppliers, neighbouring estates, nearby villagers, schools, Department of Orang Asli Development (JAKOA), government district clinic. Records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, are being maintained. Stakeholders at the meeting were informed that the meeting is to ensure better understanding of each other's concerns, role of estates within the community, and as a platform to share ideas with all stakeholders.
C 6.3 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and	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	The Bukit Leelau CU is bound by the Company's Standard Operating Procedure known as "Grievance Procedure". The procedure includes the mechanism of receiving, recording and addressing any complaints/grievance from affected parties. Bukit Leelau CU keeps a Grievance/Complaints Book (known as the Green Book by workers, staff and external stakeholders). With regards of ensuring anonymity of complainants or whistle-blowers, IOI has its 'Whistle-blowing Policy'.
	6.3.2	Documentation of both the		Review of the Green Book/Complaints Book at the visited operating units showed that all

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Clause	Indicators		Comply Yes/No	Findings
accepted by all affected parties		process by which a dispute was resolved and the outcome shall be available. Major Compliance	YES	disputes, grievances as well as the solution achieved are recorded. The recording also showed that the system was effective to resolve complaints and disputes in an effective, timely and appropriate manner. This is was sighted in the Grievance Book which shows that grievances on house repairs are resolved within one day, or within a reasonable timeframe taking into account the need to purchase repair materials.
C 6.4 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	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 entitled "Grievance Procedure for land owner issues" is available and documented. It identifies legal and customary rights and also identifies people entitled to compensation. The procedure also includes handling land ownership issues, boundary stones and squatter issues and all related to the process of identifying legal and customary rights and the compensation that they are entitled to.
	6.4.2	A procedure for calculating and distributing fair compensation shall be established and implemented, monitored and evaluated in a participatory way, and 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 and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. Minor Compliance	YES	The Procedure for calculating and distributing fair compensation had been established in the 'Grievance Procedure For Land Owner Issues'. According to the procedure, the calculation and distribution of compensation would be carried out at the company level, and not at the estate/mill level. However, there has been no claim for compensation made against the CU, and as such, there is no record of implementation.
	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	As of the date of this Audit, no negotiation and payment of compensation has been carried out to any party as there has been no evidence of any land dispute or overlapping claims.
C 6.5 Pay and conditions for employees and for contract workers always meet at least	6.5.1	Documentation of pay and conditions shall be available. Major Compliance	YES	Documentation of pay throughout Bkt Leelau CU is documented in monthly pay slips given out to all employees. The pay slips contain details such as name of production unit, name of employee, month of pay, field work wages, overtime, medical leave pay, number of days worked, deductions, and net pay. Briefings on how to understand the payslips were also given when the workers first arrived, repeated by annual briefings. Conditions

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Clause	Indicators		Comply Yes/No	Findings
legal or industry minimum standards and are sufficient to provide decent living wages				of pay on the other hand, are stipulated under paragraph 7 of the workers' employment contracts. This paragraph states that the payment is to be in compliance with the Minimum Wages Order 2018 i.e. RM42.31 per day for the 8 hours of work or a spread over period of 10 hours per day.
	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	Details of payments and conditions of employment are stated and documented in the Letters of Employment given to all workers and staff at the CU. The documents are prepared in dual-language, i.e. English and another language that the worker is conversant in (either Hindi, Bengali, or Bahasa). The contract stipulates terms of conditions of service such position, period of employment, types of work, responsibilities of employer, responsibilities of employee, salary payable, working hours, annual leave, sick leave and public holidays, mutual termination of contract, facilities, etc. The documents are signed by the Human Resources Manager and the worker, and dated.
	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	Field visits to the line sites reveal that generally, the Estates and Mills provide adequate housing to their employees rent-free. Among the facilities provided at the workers' housing complex include a clinic, a playing field, surau, badminton court, and a grocery shop. The estate also provides filtered alkaline water for free which can be assessed by every worker living at the housing complex. A contractor comes to dispose of domestic waste to send to the landfill in Bukit Ibam. Items that can be recycled are segregated for disposal by the contractor.
	6.5.4	Growers and millers shall make demonstrable efforts to monitor and where able, improve workers' access to adequate, sufficient and affordable food. Minor Compliance	YES	It has been demonstrated by Bukit Leelau CU that efforts are made to ensure workers' access to adequate, sufficient and affordable food. This was evident by the presence of canteens or sundry shops near the workers' housing area. These shops sell sufficient supply of daily requirements such as rice, flour, eggs, sugar, milk, cooking oil, frozen food, beverages, toiletries, etc. The price of each item is clearly marked, and they differ slightly between cash and credit purchases.
C 6.6 The employer respects the rights of all personnel to form and join trade unions of their choice & to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under	6.6.1	A published statement in local languages recognising freedom of association shall be available. Major Compliance	YES	The published statement recognising freedom of association is available in the Company's Equal Opportunity and Freedom of Association Policy dated October 2017 signed by the Plantation Director.
	6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. Minor Compliance	YES	There is no trade union at Bukit Leelau CU. However, all the Estates and Mill under Bukit Leelau CU, allow workers to choose their own representatives to attend meetings with the management. These meetings are known as the Joint Consultative Committee (JCC) Meetings. The JCC is chaired by the Manager. The JCC comprise representatives from management and workers. The workers' representatives were nominated through an election process by the workers themselves. The JCC meets once every two months.

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Clause	Indicators		Comply Yes/No	Findings
law, the employer facilitates parallel means of ind. and free association and bargaining for all such personnel.				
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	Policy statement for No Child Labour by the IOI Group Plantation Director available. There was also no evidence that the estates and the mill employ anyone below the age of 18 years. This was verified by examining the master lists of each operating unit where details of the workers' IC numbers and dates of birth are available.
C 6.8 Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.	6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. Major Compliance	YES	A Policy entitled Equal Opportunity Employment and Freedom of Association Policies is available and displayed at the main notice boards and at the workers' housing. The Policy states that there will be no discrimination based on race, national origin, religion, gender, union membership and age. Interviews with workers also confirmed that they are given equal opportunities.
	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	Job openings were made available to any qualified person regardless of their socio-cultural, political or gender background. All workers were covered by the same pay and conditions of employment associated with the jobs they are hired for. The workers and staff were not discriminated against in any way and their rights not infringed, in accordance with Human Rights Commission of Malaysia Act 1999 (Act 597).
	6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion where relevant are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. Minor Compliance	YES	Based on interviews with the estates and mill management and documentation review (interview assessment and medical report), recruitment selection, hiring and promotion are based on suitable job vacancies, experience, qualification/skill and medical fitness appropriate for the job. Candidates submit their application forms followed by interview assessment and medical check-up. Annual appraisal forms are used to determine the employee's skills and capabilities.
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 and communicated to all levels of the workforce. Major Compliance	YES	Bukit Leelau CU follows a Company Policy entitled "Policy on the Prevention and Eradication of Sexual Harassment in the Workplace". The implementation of this Policy lies within the purview of the Gender Committee. The Gender Committee consists of all women who live within the estate and mill premises, including workers' spouses who are non-employees. This Policy communicated to all levels of workforce by displaying the Policy at the main notice boards in the office and at the workers' housing area.
	6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated	YES	A Policy to protect the reproductive rights of all especially women is available in the "Protection of Reproductive Right Policy" and communicated to all levels of workforce by displaying the Policy at the main notice boards at the office and at the workers' housing areas. The Gender Committee communicates this Policy during meetings.

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Clause	Indicators	Comply Yes/No	Findings
	to all levels of the workforce. Major Compliance		
	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	A specific grievance mechanism which respects anonymity and protects complainants is available. The grievance mechanism also has a workflow for the Sexual Offence Complaints. Anonymity is assured via the Company's Whistleblower policy.
C 6.10 Growers and millers deal fairly and transparently with smallholders and other local businesses.	6.10.1 Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. Minor Compliance	YES	Generally, Bukit Leelau POM did not receive any third-party crop. However, it recently received FFB from RSPO-certified FFB neighbouring estates from Boustead Plantations, due to the neighbours' mill shutdown. Details of FFB prices based on MPOB pricing are available at the Bukit Leelau Mill weighbridge.
	6.10.2 Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented. Major Compliance	YES	The Mill does not receive any uncertified FFB since this CU is under Identity Preserved Model. However, recently it purchased RSPO-certified FFB from Boustead Plantations. The Purchase Forms contain date and time FFB was received, name of estate, ticket numbers, vehicle numbers, gross tonnage, tare, nett and OER%.
	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	All contractors confirmed their understanding of the contracts they have entered into, and know their obligations under the contract. Based on the above documentation reviews and interviews conducted, it was verified that the contracts are fair, legal and transparent.
	6.10.4 Agreed payments shall be made in a timely manner. Minor Compliance	YES	All third-party contractors comprising FFB transporter, JCB supplier, and hardware supplier interviewed confirmed that payments are made online and done in a timely manner, i.e. less than one month from the date of invoice.
C 6.11 Growers and millers contribute to local Sustainable development where appropriate.	6.11.1 Contributions to local dev. that are based on the results of consultation with local communities shall be demonstrated. Minor Compliance	YES	Bukit Leelau CU's significant contributions to the local development include employment opportunities to the local community. For example, Bukit Leelau Estate and Bukit Leelau Mill employ 8 people and 30 people from the local communities, respectively.
	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	Bukit Leelau CU does not involve with any scheme smallholders, and therefore this Indicator is not applicable.
C 6.12	6.12.1 There shall be evidence that no		IOI Sustainable Palm Oil Policy contains a written commitment under Human Rights and

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Clause	Indicators		Comply Yes/No	Findings
No forms of forced or trafficked labour are used.		forms of forced or trafficked labour are used. Major Compliance	YES	Workplace, to eliminate all forms of forced, illegal, bonded or compulsory labour. Foreign workers are able to keep their own passports and their movements are not restricted after working hours.
	6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. Minor Compliance	YES	As verified through employment contracts, and interviews with foreign workers, there is no evidence that contract substitution has occurred at the Mill and estates. They were aware of the types of work they would be doing before they arrived in Malaysia. The actual job undertaken was the same as what they were informed of while they were still in their home country.
	6.12.3	Where temporary or foreign workers are employed, a special labour policy and procedures shall be established and implemented. Major Compliance	NO	The Bukit Leelau CU subscribes to IOI Plantations's Foreign Workers Recruitment Guidelines & Procedure in Malaysia. And, the IOI Group's Sustainability Palm Oil Policy under Human Rights and Workplace specifically states that the responsible recruitment practices including not charging recruitment fees at any stage in the recruitment process, "whether by us, our contractors, our agents, or their sub-agents in receiving and sending countries". For the recruitment of Bangladeshi workers, a memo dated in Mar 2018 states that in compliance with the company's policy on No Recruitment Fee", they shall be reimbursed the official recruitment cost to all the new Bangladeshi workers who arrive from June 2017 onwards on the following conditions: Reimbursement of RM1,550 per worker after completing 6 months of service/arrival; and that the workers must have signed i) Official Declaration and ii) Employee Declaration. It was noted that as of the date of this audit, the following workers still have not been reimbursed with RM1,550 recruitment fees. Therefore, a Major Non-Compliance RZ 02 2019 was issued.
C 6.13 Growers and millers respect human rights	6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations. Major Compliance	YES	Policy entitled 'Sustainable Palm Oil Policy' dated March 2018 is available. Communication method were by displaying in strategic workplaces, training and morning roll calls.
	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	YES	Bukit Leelau Certification Unit is located in Peninsular Malaysia and therefore this Indicator is not applicable.

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Principle 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

Bt. Leelau 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 all four estates. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at Bt. Leelau 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	All estates continued to manage pests, disease and weeds using appropriate IPM techniques. In order to minimize use of insecticides, the estate had established nurseries for beneficial plants mainly <i>Turnera subulata</i> , <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> . This was to establish continuity in the planting of beneficial plants The estates were committed to reduce using chemicals and now have implemented and will continue to only spray Circles and noxious weeds. Soft weeds and <i>Nephrolepis bisserata</i> were maintained and encouraged in the inter rows. Where possible, Harvesters' paths were grass cut. This also suppresses growth of noxious weeds and thus reduce use of pesticides for selective weeding too. EFB is applied in single layers to prevent/suppress Rhinoceros Beetle from breeding. During replanting <i>Mucuna bracteata</i> were planted to cover chipped palm material to prevent/suppress Rhinoceros Beetle from breeding.
	b)	Environmental impacts (Criteria 4.3, 5.1 and 5.2);	YES	Bukit Leelau CU has established its environmental aspects / impacts register associated with their activities. Environmental aspect and impact (EAI) which covers from upstream activities such as FFB reception until downstream processes was sighted during assessment. Among the most significant environmental receptors for mill are the boiler stack emission which associated with air emission, palm oil mill effluent (POME) discharge and land contamination which related to managing the schedule waste and general waste. While, for the estate operation, all activities from harvesting, pest and disease, upkeep programmed until delivery to mill has been identified.

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Clause	Indicators		Comply Yes/No	Findings
	c)	Waste reduction (Criterion 5.3);	YES	Bukit Leelau CU had established its Waste Management and Reduction Plan to reduce waste that it had identified.
	d)	Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);	YES	<p>Pollution and GHG emission plans continued to be implemented. These included:</p> <ul style="list-style-type: none"> • monitoring of compliance to applicable requirements of black smoke and dust particulate emission from chimneys by mill. • Road grader, Compactor and Tractor Service Program and Road Maintenance Program to improve efficiency of usage of fossil fuels by estates. • reduce of fertilizer usage by estate via: <ul style="list-style-type: none"> (i) use as per dosage recommendation. (ii) fertilizer application calibration. (iii) use of fertilizer dosage (amount) control spreader. (vi) reuse of EFB and decanter cake. • Increase barn owl occupancy rate and reduce the rat bait usage <p>Records of implementation maintained available. Such examples of records were related to vehicles maintenance, diesel usage, CEMS, stack analysis, fertilizer usage, etc.</p>
	e)	Social impacts (Criterion 6.1);	YES	There are plans to build a volleyball court at Detas Estate, estimated to complete in December 2019. Additionally, there are also plans to provide chipping stones around workers quarters as part of the landscape improvement plans.
	f)	Encourage optimising the yield of the supply base. Major Compliance	YES	<p>All estates were committed to implement best agricultural practices, inclusive of</p> <ul style="list-style-type: none"> • timely and proper fertilizer, EFB & compost application; • maintain/conservate water by water management, • improve on accessibility to maximise crop evacuation • reduce surface run off water to prevent leaching of fertilisers • improving extended harvesting interval

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Clause	Indicators		Comply Yes/No	Findings																		
4.5.3 Time-bound plan Note: Where there are isolated lapses in 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;	(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	IOI Corporation Berhad is in progress to certify 5 PMU's from 2019 to 2020 as verified through Time Bound Plan (TBP) as at 30/6/2019 as follows: <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>No</th> <th>Plantation Management Unit (PMU)</th> <th>TBP</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PT Sukses Karya Sawit, Indonesia</td> <td>2019</td> </tr> <tr> <td>2</td> <td>PT Berkat Nabati Sawit, Indonesia</td> <td>2019</td> </tr> <tr> <td>3</td> <td>PT Bumi Sawit Sejahtera, Indonesia</td> <td>2019</td> </tr> <tr> <td>4</td> <td>IOI-Pelita Sarawak</td> <td>2020</td> </tr> <tr> <td>5</td> <td>PT KPAM, Indonesia</td> <td>2020</td> </tr> </tbody> </table>	No	Plantation Management Unit (PMU)	TBP	1	PT Sukses Karya Sawit, Indonesia	2019	2	PT Berkat Nabati Sawit, Indonesia	2019	3	PT Bumi Sawit Sejahtera, Indonesia	2019	4	IOI-Pelita Sarawak	2020	5	PT KPAM, Indonesia	2020
	No	Plantation Management Unit (PMU)	TBP																			
	1	PT Sukses Karya Sawit, Indonesia	2019																			
2	PT Berkat Nabati Sawit, Indonesia	2019																				
3	PT Bumi Sawit Sejahtera, Indonesia	2019																				
4	IOI-Pelita Sarawak	2020																				
5	PT KPAM, Indonesia	2020																				
(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	The time-bound plan contain a list of subsidiaries, estates and mills. Based on the time bound plan (Refer to Attachment 7), 14 units have been certified after obtaining RSPO membership and 5 uncertified units are in progress for certification which will be not later than year 2020.																			
(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 the company is legally registered with the local notary or chamber of commerce (or equivalent);	YES	No revision of the time bound plan. The time bound plan was endorsed by the Sustainability Department, IOI Corporation Berhad.																			
4.5.4 Requirements for uncertified management units:	(a)	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 1 st January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development,	YES	Based on the internal audit report for 8 uncertified unit of IOI Group dated 16-19/7/2019 (Indonesia), 19-21/2/2019 (Sarawak) and the time bound plan, there was no new replacement of primary forest or HCV after 1/1/2010, including for 1 uncertified units at IOI Pelita (Sarawak). However, for the other 4 uncertified units																		

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		<p>compliance with the NPP shall be verified by an RSPO accredited CB;</p>		<p>namely, PT Sukses Karya Sawit, PT Berkat Nabati Sawit, PT Bumi Sawit Sejahtera and PT KPAM, replacement of primary forest after 1/1/2010 were reported.</p> <p>Update on the RSPO Suspension and Complaint by Aidenvironment against PT Sukses Karya Sawit (PT SKS), PT Berkat Nabati Sawit (PT BNS) and PT Bumi Sawit Sejahtera (PT BSS); Final verification by RSPO CP was conducted at the end of Jan 2018. IOI received a letter from RSPO Complaints Panels' dated 12/7/2018 with regards to the final decision on the complaint. Few additional recommendations were highlighted in their letter. Further and updated progress of this issue could be access through the link below; https://rspo.org/members/complaints/statusof-complaints/view/80.</p> <p>Certification preparations in progress. As part of the preparation, a Certification Body had been engaged to conduct the gap assessment. The gap assessment was conducted at the end of Aug 2018 and the management planned to go RSPO Assessment Stage 1 in Aug 2019. Governmental 'Hak Guna Usaha' (HGU) application in progress.</p> <p>As for PT KPAM, Indonesia, this company is in the process to conduct NPP upon completion of HCV report and review by HCVRN. All reports will be posted on the RSPO for Public Consultation.</p>
	(b)	<p>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;</p>	<p>YES</p>	<p><u>IOI-Pelita Sarawak</u> Grassroots has officially withdraw themselves as the complainer for IOI-Pelita land dispute case on 22/6/2018. They signed an agreement with IOI on being the facilitator for the dispute resolution. Grassroots withdrawal as the complainer are seen to avoid the "Conflict of Interest" if they are going to sign an agreement with IOI on this case. IOI has continued to work closely with all its stakeholders especially Grassroots and RSPO Complaints Panel (CP) concerning the IOI-Pelita case to resolve this long - standing dispute.</p> <p>IOI provided the communities with a list of local NGOs and legal advisors who could provide the communities with impartial and expert advice, a service that would be</p>

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			<p>paid for by IOI. Furthermore, on August 11th IOI, local NGOs and the lead facilitator held a day-long workshop with the community leaders in Miri to discuss the Draft Resolution Plan and brief them on the facilitation and capacity building services they could provide to the affected communities.</p> <p>The ground team has actively conducted land survey procedure in Tegai Estate involving communities and cooperation from Sarawak Land Survey Department in July 2018. The data obtained from the survey will be used in the compensation mechanism with the communities' hence resolving dispute in the area. Further and updated progress of this issue could be access through the link below; https://rspo.org/members/complaints/statusof-complaints/view/4.</p>
I	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3;	YES	Based on internal audit report for uncertified units of IOI Group dated 16-19 July 2019 (Indonesia), 19-21 Feb 2019 (Sarawak), there was no issue on labour disputes for all uncertified units.
(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	YES	Based on internal audit report for uncertified units of IOI Group dated dated 16-19 July 2019 (Indonesia), 19 -21 Feb 2019 (Sarawak), there was no issue on legal non-compliance for all uncertified units.
I	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:		
	<ul style="list-style-type: none"> 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	Based on internal audit report for uncertified units of IOI Group dated dated 16-19 July 2019 (Indonesia), 19 -21 February 2019 (Sarawak), the IOI had assessed all uncertified units on the requirements (a) – (e). IOI Group also has made a positive assurance statement for A) Time bound plan, B) Requirements for uncertified management units and/or holdings, and C) Timely Notification of Changes, through an official letter

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			'Statement of Declaration by Organization (Grower) on the compliance with Rules for Partial Certification as per Time Bound Plan' dated 30 June 2019.
	<ul style="list-style-type: none"> Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. 	YES	Based on internal audit report for uncertified units of IOI Group dated 16-19 July 2019 (Indonesia), 19-21 Feb 2019 (Sarawak), the IOI had assessed all uncertified units on the requirements (a) – (e). IOI Group also has made a positive assurance statement for A) Time bound plan, B) Requirements for uncertified management units and/or holdings, and C) Timely Notification of Changes, through an official letter 'Statement of Declaration by Organization (Grower) on the compliance with Rules for Partial Certification as per Time Bound Plan' dated 30 June 2019.
	<ul style="list-style-type: none"> Desktop study e.g. web check on relevant complaints 	YES	Verified through RSPO website: https://www.rspo.org/members/status-of-complaints/ , https://askrspo.force.com/Complaint/s/case/50090000028Erz8AAC/detail
	<ul style="list-style-type: none"> 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 further stakeholder consultation or field inspection were conducted.
<p>4.6.4 The CB shall review whether oil palm operations have been established in 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 compliance with the specific terms of such agreements.</p>	No additional indicators	YES	As it has been mentioned in 2.2.1 of this checklist, Bukit Leelau CU owned the land as it was leased and bought from the previous land owner, the Pahang State Government and KDYMM Sultan Pahang. Based on the interviews and this audit finding, it has been confirmed that there was no such case concerning the rights of local communities and indigenous peoples at Bukit Leelau CU.
<p>Note:</p> <p>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;</p> <p>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 Cert. Systems.</p>			

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ATTACHMENT 4

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

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
Indicator 4.1.2 RZ 01	Major (Recurrent Minor)	<p>Objective evidence: The contents of the following paragraphs conflict with each other:</p> <ul style="list-style-type: none"> a. IOI Group Sustainable Palm Oil Policy revised in March 2018 (under paragraph Human Rights and Workplace), states that IOI Group commits to “eliminate all forms of illegal, forced, bonded, compulsory... labor ...” b. Paragraph 3e) of New/Amended Terms and Conditions of Employment Contract states that “The Employee undertakes to work with the Employer for 3 years...”, whereas paragraph 12 d) states that “The Employee may terminate this contract by giving 14 days’ notice...” c. Paragraph 12e) Offer of Employment as Plantation Worker states that “The Employee undertakes to work with the Employer for 3 years...”, whereas paragraph 3 d) states that “The Employee may terminate this contract by giving 14 days’ notice...” d. Paragraph 9 of the Employee Declaration states “I guarantee to work with the Company for at least 3 years”. 	<p>A mechanism to check consistent implementation of the relevant document prepared. The Document “Mechanism for Internal Checking of HR-related documents” will be used to check consistent implementation of HR related documents in future.</p>	<p>The documents:</p> <ul style="list-style-type: none"> 1) IOI Labour Rights Monitoring System 2) Labour Implementation Gaps Monitoring Checklist 3) Mechanism for Tracking Changes in Law 4) Mechanism for Internal Checking of HR-related documents <p>demonstrate that a mechanism to check consistent implementation of the following documents</p> <ul style="list-style-type: none"> - IOI Group Sustainable Palm Oil Policy revised in March 2018; - New/Amended Terms and Conditions of Employment Contract; - Offer of Employment as Plantation Worker; and - Employee Declaration. <p>have been established. Status Closed</p>
Indicator 5.1.1 DZ 01	Major	<p>Objective evidence: Transportation of fertilizers and chemical for spraying activities to the field have not been assessed in the environment impact assessment (EIA) report.</p>	<p>The Environment Impact Assessment has been revised by including the transportation of fertilizer and chemical for spraying activities to the field.</p>	<p>It was verified that in the revised Environment Impact Assessment document the transportation of fertilizer and chemical for spraying activities to the field had been included. Status Closed</p>

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<p>Indicator 6.12.3 RZ 02</p>	<p>Major</p>	<p>Objective evidence: Workers who have complied with the conditions stipulated in 2a & b above have not been paid the official recruitment cost.</p>	<p>The respective estates have reimbursed the official recruitment cost to the affected workers.</p>	<p>Evidence of payment, that is, Acknowledgement Receipt signed and thumb printed by each of the 10 workers have been received. Status Closed</p>
<p>Indicator D.4.2 SK 01</p>	<p>Major</p>	<p>Objective evidence: 1. CPO production more than certified volume, 2. No approval record from RSPO EB.</p>	<p>1. An excel sheet template was designed to monitor the stock movement to ensure that the overproduction can be detected as soon as it occurs. 2. Apply to CB for submission of the CPO volume extension to RSPO EB.</p>	<p>The CPO volume extension of 2,273.21MT has been applied and approved by RSPO EB. Status Closed</p>

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ATTACHMENT 5

RSPO SUPPLY CHAIN : AUDIT CHECKLIST

SECTION B : 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.	Bukit Leelau POM (hereafter refer as BLPOM) takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at following location – KM 75, Kuantan-Segamat Highway, 26700 Muadzam Shah, Pahang
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
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 Palm Trace Registration no. available.
1.4	Processing aids do not need to be included within an organization's scope of certification.	Not Applicable
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.	BLPOM obtained certified FFB from own certified supply base (as listed below). BLPOM also found to be aware of the downgrading procedure – refer to para 5.5 of RSPO/SOP/COC/3 (latest issuance) List of certified supply base which does not change since last audit (CU own estates); Mekassar Estate, Detas Estate, Merchong Estate, Bukit Leelau Estate, Laukin A Estate & Leepang A Estate IOI sister estates; Shahzan IOI 1 Estate, Shahzan IOI 2 Estate & Pukin Estate Certified external crop; Bousted Sg Jernih & Bousted Bebar
2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	BLPOM only apply model D - CPO Mills: Identity Preserved
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:	-

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a)	Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.	Reference; - CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouse & Trading Companies - RSPO Supply Chain – Module D – CPO Mills: Identity Preserve (IP)
b)	Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).	Among record sighted are; - weighbridge ticket of FFB supplier - weighbridge ticket of BLPOM (for receiving FFB, for delivery of CPO to external storage, for delivery of PK to buyer) - consignment note - Daily FFB, CPO & PK production - Daily FFB received - Daily production report - CSPO/ PK Mass Balance Summary
c)	Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization's procedures for the implementation of this standard.	Under para 3.1 of RSPO Supply Chain – Module D – CPO Mills: Identity Preserve (IP), it was noted that Mill Manager has the overall responsibility for and authority over the implementation and compliance of the requirements. Supported with; Appointment letter dated July & January 2018 were referred and found adequate. RSPO Supply Chain Committee Organization Chart consist of; Mill Manager, Assistant Manager, Lab Supervisor, FFB Grader, Weighbridge Clerk, Chief Aux. Police, Office Clerk and WTP Attendant.
3.2	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 Claims Documents. ii. Effectively implements and maintains the standard requirements within its organization. Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct nonconformities shall be subject to management review at least annually. The organization shall be able to maintain the internal audit records and reports.	Audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard Revision 2017 requirements. Coverage of audit sufficient to cater for the new standard (including modular requirement; Module D - CPO Mills: IP). Internal audit conducted in June 2019. There are 5 non-conformities issued and it had been acted on & verified adequate by internal auditor. The outcome of the internal audit had been reviewed accordingly by the management during management review dated in July 2019.
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: <ul style="list-style-type: none">• The name and address of the buyer;• The name and address of the seller;	Available.

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	<ul style="list-style-type: none"> • 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. <p>Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</p>	
a)	The site shall have documentation that demonstrate that purchases are made to the material category agreed with their supplier (IP, SG or MB).	To demonstrate that purchases are made to the material category agreed with their supplier, BLPOM ensure consignment note from supplying estates being marked/ stamped accordingly to indicate the RSPO certified status. For certified CPO & PK produced, BLPOM update their stock accordingly in Palm Trace.
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 Shipping Confirmation on the RSPO IT platform on the level of each shipment	Internal supplier under same certification – valid certificate. For certified external crop received, certificate verification had also been made prior to receive of material. The relevant person in charge was aware that supplier certificate validity can be checked via RSPO website or Palm Trace, frequency of check at least once annually.
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 announcements.	Internal supplier under same certification – valid certificate. The relevant person in charge was aware that supplier certificate validity can be checked via RSPO website or Palm Trace, frequency of check at least once annually.
4.2	The site shall have a mechanism in place for handling non-conforming material and/or documents.	Under para 5.3 of CSFFB, CSPO & CSPK Traceability System for Estate, Mills, Warehouses & Trading Companies, it was noted that NCP & NCD shall be handled accordingly by relevant PIC using the established template/ communication channel. No non-conforming material and/or documents recorded since last audit.
5	Outsourcing activities	

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5.1	<p>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.</p> <p><i>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).</i></p>	<p>BLPOM outsource transportation and storage of certified product prior to delivery to end buyer.</p> <p>The signed agreement between BLPOM and service providers were sighted and found adequate. Management of BLPOM had also prepared 'Additional Requirements for Contractors and Service Providers, reviewed in April 2019' as supplementary to the agreement which detail out requirement as per listed by the standard.</p> <p>For delivery of PK, the lorry being chartered by buyer. Agreement with the storage facility was also sighted and found adequate.</p>
5.2	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <ul style="list-style-type: none"> 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. 	<p>Refer Additional Requirements for Contractors and Service Providers, reviewed in April 2019. The agreement was found sufficient in addressing the requirement as listed in standard clause 5.5.2 (a) – (d).</p>
5.3	<p>The site shall record the names and contact details of all contractors used for the processing or production of RSPO certified materials.</p>	<p>Not Applicable</p>
5.4	<p>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.</p>	<p>Not Applicable</p>
6	<p>Sales and goods out</p>	

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6.1	<p>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):</p> <ul style="list-style-type: none"> • 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. 	<p>The requirement of sales & goods out especially on notation of SC model applied & SC cert no complied by indicating in weighbridge dispatch ticket</p>
7	Registration of transactions	
7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> • are mills, traders, crushers and refineries; • take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (refer to Fig.2 and 3 and Annex 1 of the RSPO SCC Standard); • shall register their transaction in the RSPO IT platform, and • confirm upon receipt where applicable. 	<p>The registration of transaction being carried out by Sustainability Manager or Sustainability Executive. Example of shipping announcement reviewed.</p>
7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> • shipping announcement / announcement; • trace; • remove; • confirm. 	<p>Available.</p>
8	Training	
8.1	<p>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.</p>	<p>Sustainability Program FY 2019 established & being reviewed accordingly by the Management. The relevant training records were well maintained.</p>
8.2	<p>Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation</p>	<p>Training had been conducted in July 2019 involving internal stakeholders such as RSPO committee members/ CCP as mentioned below as well as foreign worker representatives.</p>

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	of the supply chain certification system.	The training focus on relevant IP procedures and record, attendees consist of assistant manager, sustainability clerk, laboratory supervisor, weighbridge clerk etc. Training material was found to be adequate in addressing the standard requirements, relevant to the tasks performed.
	Training shall be specific and relevant to the task(s) performed.	
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.	The relevant record pertaining to RSPO SCCS within BLPOM found to be updated accordingly and easily accessible during the audit.
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 pertaining to implementation of RSPO SCCS within BLPOM retained for minimum 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).	BLPOM process all the received certified crop & their processing output will be based on their actual Oil Extraction Rate (OER) & Kernel Extraction Rate (KER).
10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	These figures were monitored on daily & monthly basis by the mill using the prepared template to ensure their accuracy as well as monitoring of their ongoing performance
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.	Relevant information on product claim (including applicable SC model and certificate no.) being correctly indicated in the relevant outgoing paperwork (sales contract). BLPOM has not opted for the use of RSPO trademark logo.
	RSPO RULES ON MARKET COMMUNICATIONS AND CLAIMS – General corporate communications	

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4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	Complied, refer to https://www.ioigroup.com/Content/S/S_Systems
4.2	In corporate communications a member is allowed to: a. display its RSPO membership status b. display the RSPO web address (www.rsपो.org) c. state that the member supports the work of the RSPO d. state the member's history with regard to the RSPO e. use the RSPO trademark to promote its membership of the RSPO.	Complied - through IOI Group main website, link as per the above. The emphasize made on the above mention link is as per (c) & (d).
4.3	Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rsपो.org ' where the link must lead to the member's profile page.	Not Applicable
4.4	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied
4.5	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Complied
4.6	Members are not allowed to use the RSPO corporate logo as shown in the guidance document. This is for the sole use of the RSPO secretariat.	Not Applicable
	Business to business communication	
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Relevant sales document from BLPOM to customer had stated the supply chain model and certificate number under which the claim is being made.
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: A. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of	Not Applicable

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	own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. B. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	
5.4	A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.	Not Applicable
	Business to consumer communication	
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims or on pack claims. Product-specific claims are voluntary.	Not Applicable
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Not Applicable
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorized for use in relation to any other ingredient.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorized product-specific claim.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained	Not Applicable

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	<p>within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members.</p>	
12	Complaints	
12.1	<p>The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.</p>	<p>Reference: para 5.2 Handling complaints. The procedure was found sufficient for collecting and resolving stakeholder complaints – group Grievance Procedure which can be access through IOI website - https://www.ioigroup.com/Content/S/S_Track. However, no complaint from stakeholder with regards to RSPO SCCS recorded since last audit.</p>
13	Management review	
13.1	<p>The organization is required to hold management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.</p>	<p>Management review planned once annually. Last Sustainability Management Review Meeting conducted on July 2019.</p>
13.2	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO SCCS • Customer feedback • Status of preventive and corrective actions • Follow-up actions from management reviews • Changes that could affect the management system • Recommendations for improvement 	<p>Management review meeting minute had been established. Coverage of review meeting found sufficient, input and output discussed had listed the item as required by the standard.</p>
13.3	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes • Resource needs 	

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SECTION C : SUPPLY CHAIN MODELS (to only use whichever is applicable)

	Module D – CPO Mills: Identity Preserved	
D.3	Documented procedures	
D.3.1	<p>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:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</p> <p>b) The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements.</p> <p>This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard.</p>	<p>Refer to Standard Operating Procedure (SOP) – CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouses & Trading Companies. Following are listed item under the SOP;</p> <ol style="list-style-type: none"> 2. Scope 3. Supply Chain models & records 4. Responsibilities & procedures <ol style="list-style-type: none"> 4.1 Internal Control System (ICS) 4.2 Farms/Estates 4.3 Mills 4.4 Warehouse 4.5 Trading Companies 5. Procedure details <ol style="list-style-type: none"> 5.1 Internal audit 5.2 Handling complaints 5.3 Handling non- conformities 5.4 Handling RSPO products 5.5 Downgrading & Mass Balance traceability 5.6 Ensuring Segregation for RSPO certified mill <p>In addition to above, BLPOM also prepare RSPO Supply Chain – Module D -CPO Mills: Identity Preserve (IP), which consist of following;</p> <ol style="list-style-type: none"> 2. Scope 3. Responsibilities <ol style="list-style-type: none"> 3.1 Overall responsibilities 3.2 Responsibilities of POM employees 4. Reception of raw material <ol style="list-style-type: none"> 4.1 FFB crop (goods in) 5 Processing & storage <ol style="list-style-type: none"> 5.1 Processing 5.2 Storage 5.3 Crushing of CSPK 6. Dispatch of mill produce <ol style="list-style-type: none"> 6.1 CSPO & CSPK produce (goods out) 7. Record & retention <ol style="list-style-type: none"> 7.1 Records 7.2 Retention

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		<p>8. Training 9. Claims 10. Overproduction 11. Handling complaints 12. Non-conformities product Mill Manager have overall responsibility and authority over the implementation of the standard requirements and compliance supported by Assistant Mill Manager & CCP team members.</p>																																													
D.3.2	The site shall have documented procedures for receiving and processing certified and non-certified FFBs.	Receiving of certified and non-certified FFB procedure was stated in section 3.2 and "Group Standard Operating Procedure for POM".																																													
D.4	Purchasing and goods in																																														
D.4.1	The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.	<p>List of certified supply base which does not change since last audit (CU own estates); - Mekassar Estate - Detas Estate - Merchong Estate - Bukit Leelau Estate - Laukin A Estate - Leepang A Estate</p> <p>IOI sister estates - Shahzan IOI 1 Estate - Shahzan IOI 2 Estate - Pukin Estate</p> <p>Certified external crop received from - Busted Sg Jernih - Busted Bebar</p> <p>Actual (September 2018 – August 2019)</p> <table border="0"> <tr> <td></td> <td></td> <td align="right"><u>MT</u></td> </tr> <tr> <td>a) FFB Received</td> <td></td> <td align="right">215,119.9</td> </tr> <tr> <td> RSPO</td> <td align="right">215,119.9</td> <td></td> </tr> <tr> <td> Non-RSPO</td> <td align="right">0</td> <td></td> </tr> <tr> <td> FFB Processed</td> <td></td> <td></td> </tr> <tr> <td> RSPO</td> <td align="right">215,119.9</td> <td></td> </tr> <tr> <td> Non-RSPO</td> <td></td> <td></td> </tr> <tr> <td> CPO Production</td> <td align="right">51,798.42</td> <td></td> </tr> <tr> <td> PK Production</td> <td align="right">9,721.03</td> <td></td> </tr> <tr> <td>b) Delivery of CPO</td> <td></td> <td></td> </tr> <tr> <td> RSPO (IP)</td> <td align="right">44,740.98</td> <td></td> </tr> <tr> <td> Non-RSPO</td> <td align="right">7,792.76</td> <td></td> </tr> <tr> <td> Delivery of PK</td> <td></td> <td></td> </tr> <tr> <td> RSPO (IP)</td> <td align="right">8,720.37</td> <td></td> </tr> <tr> <td> Non-RSPO</td> <td align="right">635.52</td> <td></td> </tr> </table>			<u>MT</u>	a) FFB Received		215,119.9	RSPO	215,119.9		Non-RSPO	0		FFB Processed			RSPO	215,119.9		Non-RSPO			CPO Production	51,798.42		PK Production	9,721.03		b) Delivery of CPO			RSPO (IP)	44,740.98		Non-RSPO	7,792.76		Delivery of PK			RSPO (IP)	8,720.37		Non-RSPO	635.52	
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D.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	It has been noted that there was an overproduction of CPO during the reporting period. As the CB was not informed and proper approval from RSPO was not available, an NCR Major																																													

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		SK-01 was raised for this issue to be addressed accordingly.
D.5	Record keeping	
D.5.1	The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	The record for receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK were done on real time basis using the various report/ record as mentioned in para 3.1b of this checklist.
D.6	Processing	
D.6.1	The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept segregated from non-certified oil palm product including during transport and storage.	Marketing department responsible for the purchase and sell of raw material and finished product respectively. Relevant information will be provided to BLPOM for reference on site. The dispatch of the RSPO certified CPO/ PK to buyer by BLPOM were made based on agreement, as per noted in sales contract. The receiving pit, pipelines and tanks in BLPOM were thoroughly cleaned, swept and flushed before RSPO certified CPO was pumped in to avoid contamination. Dedicated tanks were used to store RSPO certified CPO from BLPOM. The same practice occurs for separate handling of certified palm kernel. For traceability of a specific batch of RSPO certified CPO back to the supplying POM, BLPOM kept the relevant documents such as the weighbridge ticket, CPO dispatch note, Dispatch oil quality ticket, Authorization from transporter, Borang MPOB L3, CPO dispatch authorization issued by the POM.
	The objective is for 100 % segregated material to be reached.	BLPOM does not accept any non-certified FFB. It was confirmed through summary of weighbridge ticket and interview with relevant personnel such as Mill Manager, Sustainability Officers and weighbridge clerk. Therefore, CPO and PK can be considered 100% segregated.

Module E – CPO Mills: Mass Balance – Not Applicable
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ATTACHMENT 6

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
Indicator 1.1.2 MAR 01	Major	Records of request and Information regarding Certified Area was found incorrect. The information given to CB regarding Certified Area at Bukit Leelau CU since 2017 (Annual Surveillance Audit 2) was not correct due to not tally with stated Land Title.	The "Information Required Bukit Leelau CU" form was amended with the correct data. The appendix was attached with supporting documents.	The management has provided the amended data. The amended data was in "Information Required Bukit Leelau CU" form and support with the other documents such as copy of land title from Laukin A. Status: Closed
Indicator 4.1.1 STK 01	Major	SOPs for Peat Soil maintenance. On Bukit Leelau Estate SOP to monitor subsidence of peat soils was not available.	The SOP on monitoring of peat subsidence has been finalized and it shall serve as a major reference document on the procedure of managing the peat area in plantations.	The management had developed, established and reviewed the SOP for peat soil maintenance. The document is No: SOP # 4.11, Rev 1a, Dated 03.01.2019 was sighted Status: Closed
Indicator 4.1.2 STK 02	Minor	The Standard operating procedure (SOP) Appendix 13b – Procedure 'Kerja Selamat Pemandu Traktor' was not demonstrated. Bukit Leelau Estate and Detas Estate - At time of audit, wheel bolts and nuts were found to be missing from a number of tractor trailers.	Competent training on "Prosedur Kerja Selamat Pemandu Traktor" has been conducted for tractor driver. New tractor checklist that includes wheel bolts and nuts has been distribute to all IOI Estate and instructed the drivers to check their tractors every day by referring to the checklist.	During the visit some tractors and trailers were checked and found that all had the complete set of wheel nuts and bolts. Status: Closed
Indicator 4.7.5 MAR 02	Minor	Accident and emergency procedures not exist for inhale of a highly toxic pesticides. Accident and emergency procedures in Mekassar and Merchong Estate is not exist for inhale of a highly toxic pesticides.	Emergency Response Procedure was updated and Highly Toxic Poisoning has distributed to all IOI Estate.	Accident and emergency procedures for inhale of a highly toxic pesticides was available and updated at all estates audited. Random interview with the estate workers showed that they were aware of accident and emergency procedures. Status: Closed
Indicator 4.8.1	Major	No assessment for training needs and formal training program for Standard Operating Procedures for operational activities was available. All Estates -There is no evidence to show that	A new "Workers Annual Training Needs and Program" has been developed for the operating centres to identify the	The template 'Workers Annual Training Needs and Program' has been sighted. The 2019 training program covered the

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STK 03		assessment for training needs and formal training program for Standard Operating Procedures of estate operations like harvesting standards, pruning standards, manuring, weeding, etc.	trainings required by each worker and indicate the date training was conducted. A sample of the "Workers Annual Training Needs and Program" template is attached.	assessment for training needs and formal training program for Standard Operating Procedures of estate operations like harvesting standards, pruning standards, manuring, weeding, etc had been covered. Status: Closed
Indicator 6.5.2 RZ 01	Major	<ol style="list-style-type: none"> 1. Workers' salary deductions were made without any request in writing received from the respective workers. 2. Workers' contracts of employment do not contain a provision for termination. 3. Non-renewal of expired contracts of employment. 4. Workers' contracts do not have a mutual termination clause. 5. Female weight bridge attendance worked after 10.00PM. 	<ol style="list-style-type: none"> 1. The respective workers in Mekassar Estate requested estate management to deduct electricity charges and buffalo loan payment from their monthly salaries by signing the "workers request for salary deduction" form. 2. The workers' employment contract has been revised to include a provision for termination (mutual termination clause by both parties). This draft of revised employment contract also integrates the New Minimum Wages Order 2018 (From RM 1,000 to RM 1,100). 3. HR department has circulated the "extension of employment contract" to all IOI operating centres and informed the managers to request workers who have completed their initial contract period to sign this document if they wish to continue to work for the following year. 4. The workers' employment contract has been revised to include a mutual termination clause by both parties. This draft of revised employment contract also integrates the new Minimum Wages Order 2018 (From RM 1000 to RM 1100). 5. Bukit Leelau Mill is in the progress of applying permit from Jabatan Tenaga Kerja (JTK) for women working after 	<ol style="list-style-type: none"> 1. Workers had signed a request to have their salaries deducted for water, electricity bills and NUPW fees in October 2018. Sighted were the requests in writing from the workers. 2. Workers' employment contracts now contain a termination clause under clause 12d) and clause 3d) of their employment contracts, or renewed employment contract respectively. 3. The extension of employment contract together with workers' wish to have their contracts renewed were sighted. 4. It was verified that mill workers' contracts and all other contracts of employment contain a mutual termination clause. It is contained in clauses 11b) (for employer) and 12d) (for employee). 5. It was verified that the Labour Office exemption has been obtained permitting women employees to work between 10PM to 5AM the next day. <p>Status: Closed</p>

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			10.00 pm. An application letter was sent to JTK on 28/9/2018. JTK replied to this letter and requested for more details. Bukit Leelau Mill submitted the required documents on 25/10/2018. Bukit Leelau Mill follow up with a phone call on 29/11/2018. JTK replied that they are presently waiting for approval from their Director.	
Indicator 6.10.4 MRS 01	Minor	The contract agreement between estate and contractor did not clearly state the agreed payments period. Contract between Detas Estate and JCB contractor (valid from 1/7/2018 – 30/6/2019) does not clearly state the agreed payment period.	The management has amended the contractor's contract agreement accordingly and has instructed all operating centres to immediately use the new agreement for replace the existing contracts.	It was verified that the renewed contract contained invoice completion date added under para 11 of Special Conditions as 60 days. Status: Closed.
Indicator 5.4.1 (Supply chain) SKA 01	Major	<p>The description of the product, including applicable supply chain model (Identity Preserved) as well as certificate number of seller were not adequately indicated in the relevant incoming documents.</p> <p><u>Objective evidence</u></p> <p>a. Incoming Certified Sustainable FFB from Detas estate not indicating the certified material as being IP certified as well as missing certificate number on its FFB consignment note no. 835969 dated 31/01/18, from block/ year A1B for 32.73mt FFB, vehicle no. JLN 9927</p> <p>b. Incoming Certified Sustainable FFB from Merchong estate not indicating the certified material as being IP certified as well as missing certificate number on its FFB consignment note no. 843863 dated 28/02/18, from Ramp 2 for 31.08mt FFB, vehicle no. PHK 5757</p> <p>c. Incoming Certified Sustainable FFB from Laukin A estate not indicating the certified material as being IP certified as well as missing certificate number on its FFB consignment note no. 858250 dated 31/07/18, from all ramp for 36.26mt FFB, vehicle no. JSG 7340</p> <p>d. Incoming Certified Sustainable FFB from Leepang A estate not indicating the certified material as being IP</p>	<p>A new standardized rubber stamp has been designed, containing the following information:</p> <p>a) Name and address of seller and buyer b) Description of the product (Identity Preserved) c) RSPO Certificate Number</p> <p>The following also will available in the weighbridge ticket:</p> <p>a) Loading or delivery date b) Date of the documents issued c) Quantity products delivered d) Unique identification number</p>	<p>The management has provided copy of the standardized rubber stamp has been designed, containing the following information:</p> <p>a) Name and address of seller and buyer b) Description of the product (Identity Preserved) c) RSPO Certificate Number</p> <p>Status: Closed</p>

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		certified as well as missing certificate number on its FFB consignment note no. 869502 dated 30/08/18, from all ramp for 25.10mt FFB, vehicle no. JKB 4494, BLPOM weighbridge ticket no. 272727 dated 30/08/18 for 25.12mt of CSFFB		
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ATTACHMENT 7 – Timebound Plan

Details of Time Bound Plan as submitted by IOI Plantation Services Sdn Bhd (30th June 2019)

No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units , Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
1.	Pamol (Sabah) POM, Sabah	Meliau, Nangoh, Rungus, Tindakon, Ulu, Sugut & Bayok	May 2008	Re-Certified in November 2016	ASA-02 completed in September 2018	No outstanding issues
2.	Sakilan POM	Sakilan, Linbar 1 and Linbar 2	Nov 2008	Re-Certified in Mar 2015	ASA-04 completed in December 2018.	No outstanding issues
3.	Pamol Kluang POM	Pamol Timur, Pamol Barat, Mamor, Unijaya, Kahang and Swee Lam	Mar 2009	Re-Certified in Mar 2015	ASA-04 completed in Dec 2018	No outstanding issues
4.	Gomali POM	Gomali, Paya Lang, Bahau, Bertam, Bukit Dinding, Kuala Jelai, Tambang, Regent, Sagil, Jasin Lalang and Sembilan Tani (Associated Outgrower)	Aug 2009	Re-Certified in Aug 2015	ASA-04 completed in May 2019	In the progress of closing the NCs
5.	Baturong POM	Baturong 1, Baturong 2, Baturong 3 and Cantawan	Sept 2009	Re-Certified in Oct 2015	ASA-03 completed in July 2018.	No outstanding issues
6.	Bukit Leelau POM	Bukit Leelau, Detas, Merchong, Mekassar, Leepang A and Laukin A	Apr 2010	Re-Certified in Nov 2015	ASA-03 completed in September 2018	No outstanding issues
7.	Mayvin POM	Mayvin 1, Mayvin 2, Mayvin 5, Mayvin 6 and Tangkulap	Aug 2010	Re-Certified in Dec 2015	ASA-03 completed in October 2018	No outstanding issues
8.	Pukin POM, Pahang	Pukin, Shahzan 1, Shahzan 2, Segamat and Bukit Serampang	Dec 2010	Re-certified in June 2016	ASA-03 completed in March 2019	No outstanding issues
9.	Leepang (Sabah) POM	Morisem 5, Leepang 1, Leepang 5, Permodalan 1, Permodalan 2, Permodalan 3, and Permodalan 4	Aug 2012	Pending for Cert Issuance	Recertification audit completed in November 2018	No outstanding issues.
10.	Syarimo POM	Syarimo 1, Syarimo 2, Syarimo 3, Syarimo 4, Syarimo 5, Syarimo 6, Syarimo 7, Syarimo 8 and Syarimo 9	Sept 2012	Re-certified in Mar 2018	ASA-01 audit completed in January 2019.	No outstanding issues
11.	Ladang Sabah POM	Moynod, Luangmanis, Terusan Baru, Sungai Sapi, Laukin, Labuk, Bimbingan 1, and	Oct 2012	Re-certified in July 2018	ASA-01 audit completed in January 2019.	No outstanding issues

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No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units , Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
		Bimbingan 2				
12.	Morisem POM, Sabah	Morisem 1, Morisem 2, Morisem 3, Morisem 4, Leepang 2, Leepang 3, and Leepang 4	Sept 2013	Certified in Dec 2013	Recertification audit completed in September 2018	No outstanding issues
13.	Unico POM-1, Sabah	Unico 6, Ladang Asas (Tas & Halusah), 31 outgrowers and 1 Collection Centre	Planned - 2018	Certified in July 2018	ASA-01 audit completed in April 2019.	No outstanding issues Outgrowers are not part of the certified area
14.	Unico Desa POM-2, Sabah	Unico 1, Unico 2, Unico 3, Unico 4, Unico 5 and 16 outgrowers	Dec 2017	Certified in May 2018	ASA-01 audit completed in February 2019.	No outstanding issues Outgrowers are not part of the certified area
15.	IOI – Pelita, Sarawak	Sejap and Tegai	Planned – TBC as it is in the resolution process	Uncertified Unit	New certification for IOI – Pelita (Sarawak) is in the resolution process	<p>On 18 January 2019, IOI retained the services of the Community's Information and Communication Centre (CICOM), a local NGO, to conduct Community Capacity Building program, which is the main component of Stage I of the Resolution Plan.</p> <p>In mid-March 2019, IOI and CICOM launched the Community Capacity Building program, the purpose of which was to do the following:</p> <ul style="list-style-type: none"> • Double check whether the communities have good understanding of a) RSPO Principles & Criteria on conflict resolution, b) Free, Prior and Informed Consent process, and c) Resolution Plan itself; • Provide affected communities with any needed advice and technical expertise; • Gather community grievances, on the basis of which the Community Participatory Mapping would be designed. <p>CICOM completed the Capacity Building Program at the end of June 2019.</p> <p>Currently, with input from all stakeholders, including the State of Sarawak Government, IOI is evaluating options in regards to the surveyors to be involved in the Community Participatory Mapping.</p> <p>Further and updated progress of this issue could be access through the link below;</p> <p>(a) IOI Pelita Land Dispute Resolution Plan (b) Current progress on IOI Pelita Land Dispute</p>

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						<p>(c) Resolution Process</p> <p>(d) RSPO Case Tracker – IOI Pelita Status of Complaints</p>
16.	PT SKS, Indonesia	SKS 1, SKS 2, and SKS 3	Planned - 2019	Uncertified Unit	<p>In progress of RSPO audit preparation. RSPO Stage 1 is planned to be conducted in August 2019</p>	<p>RSPO Complaints Panel (CP) has officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development. First and Second quarterly update for the action plan on PT. SKS, PT. BNS and PT. BSS was submitted to RSPO Investigate and Monitoring Unit in December 2018 and February 2019 respectively.</p> <p>On 15th April 2019, RSPO's official announced "that the monitoring of the implementation of the Complaints Panel directives for "PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No: GR-000882 " is now officially closed."</p> <p>IOI received an email from RSPO that "the Investigation & Monitoring Unit (IMU) of the RSPO Secretariat had finalized the internal review of the action plan and progress reports submitted by IOI against the Complaints Panel's directives and the IMU concluded that IOI has successfully met all the requirements set by the Complaints Panel."</p> <p>Further and updated progress of this issue could be access through the link below;</p> <p>(a) RSPO Ketapang Complaint for PT BSS, PT SKS & PT BNS</p> <p>(b) RSPO Case Tracker – PT BSS, PT SKS & PT. BNS Status of Complaints</p> <p>The RSPO P&C audit is expected to be conducted in August 2019.</p>

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						Pending issuance of HGU.
17.	PT BNS, Indonesia	BNS 1, BNS 2, BNS 3 and BNS 4	Planned - 2019	Uncertified Unit	In progress of RSPO audit preparation. RSPO Stage 1 is planned to be conducted in August 2019	<p>RSPO Complaints Panel (CP) has officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development. First and Second quarterly update for the action plan on PT. SKS, PT. BNS and PT. BSS was submitted to RSPO Investigate and Monitoring Unit in December 2018 and February 2019 respectively.</p> <p>On 15th April 2019, RSPO's official announced "that the monitoring of the implementation of the Complaints Panel directives for "PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No: GR-000882 " is now officially closed."</p> <p>IOI received an email from RSPO that "the Investigation & Monitoring Unit (IMU) of the RSPO Secretariat had finalized the internal review of the action plan and progress reports submitted by IOI against the Complaints Panel's directives and the IMU concluded that IOI has successfully met all the requirements set by the Complaints Panel."</p> <p>Further and updated progress of this issue could be access through the link below;</p> <p>(a) RSPO Ketapang Complaint for PT BSS, PT SKS & PT BNS</p> <p>(b) RSPO Case Tracker – PT BSS, PT SKS & PT. BNS Status of Complaints</p> <p>The RSPO P&C audit is expected to be conducted in August 2019.</p> <p>Pending issuance of HGU.</p>

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No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units , Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
18.	PT BSS, Indonesia	BSS 1, BSS 2, BSS 3 and BSS 4	Planned - 2019	Uncertified Unit	In progress of RSPO audit preparation. RSPO Stage 1 is planned to be conducted in August 2019	<p>RSPO Complaints Panel (CP) has officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development. First and Second quarterly update for the action plan on PT. SKS, PT. BNS and PT. BSS was submitted to RSPO Investigate and Monitoring Unit in December 2018 and February 2019 respectively.</p> <p>On 15th April 2019, RSPO's official announced "that the monitoring of the implementation of the Complaints Panel directives for "PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No: GR-000882 " is now officially closed."</p> <p>IOI received an email from RSPO that "the Investigation & Monitoring Unit (IMU) of the RSPO Secretariat had finalized the internal review of the action plan and progress reports submitted by IOI against the Complaints Panel's directives and the IMU concluded that IOI has successfully met all the requirements set by the Complaints Panel."</p> <p>Further and updated progress of this issue could be access through the link below;</p> <p>(a) RSPO Ketapang Complaint for PT BSS, PT SKS & PT BNS</p> <p>(b) RSPO Case Tracker – PT BSS, PT SKS & PT. BNS Status of Complaints</p> <p>The RSPO P&C audit is expected to be conducted in August 2019.</p> <p>Pending issuance of HGU.</p>
19.	PT KPAM, Indonesia	Under Development	Planned - 2023	Uncertified Unit	NPP and HCSA was approved in April 2018. Currently under development.	RSPO has approved PT.KPAM NPP Summary Report and was published in RSPO website for public notification on 13

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						<p>April 2018. The NPP public notification could be assessed through the link below:</p> <p>https://rspo.org/certification/new-planting-procedures/public-consultations/loi-group-pt-kalimantan-prima-agro-mandiri</p> <p>HCSA Peer Review Assessment completed on 14 May 2018. The HCSA Peer Review Report and Summary Report could be assessed through the link below:</p> <p>http://highcarbonstock.org/registered-hcs-assessments/</p>