# SIRIMATIONAL MATERIAL

MAP: See Attachment 1

#### SIRIM QAS INTERNATIONAL SDN. BHD.

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

File Ref.: EP09760004

#### RSPO PUBLIC SUMMARY REPORT

CLIENT : WILMAR INTERNATIONAL LIMITED – SRI KAMUSAN CERTIFICATION UNIT

PARENT COMPANY: WILMAR INTERNATIONAL LIMITED

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

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

Contification Unit	Mill / Estate	Location			
Certification Unit	Mill / Estate	Latitude	Longitude	Address	
	Sri Kamusan POM	N6°12'14"	E117°17'27"		
	Sri Kamusan Estate	N6°12'31"	E117°19'17"		
Sri Kamusan	Hibumas 1 Estate	N6°13'12"	E117°32'53"	KM 238 off Jalan Nangoh	
Certification Unit	Hibumas 2 Estate	N6°16'16"	E117°28'23"	Pitas, Labuk Sugut,	
(CU)	Jebawang Estate	N6°18'48"	E117°24'28"	Sandakan, Sabah, Malaysia	
	Sekar Imej Estate	N6°15'52"	E117°16'54"		
	Sapi Sugut Estate	N6°14'34"	E117°17'09"	]	

AUDIT DATE : 11-15 March 2019 DURATION : 15 auditor days

TYPE OF AUDIT : X Annual Surveillance Audit 03 Recertification Audit

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

STANDARD 2014 (REVISED 14 JUNE 2017)

**SCOPE OF CERTIFICATION:** Production of Sustainable Crude Palm Oil and Palm Kernel Using the Mass Balance Supply Chain Model

VALIDITY OF RSPO CERTIFICATE: 13 May 2016 - 12 May 2021

		-	•				
The following attachments form part of this report:  Non-conformity Report(s)  X  List of additional site(s)							
Report by A	Audi	t Team Leader	Acknowled	lge	ment by Client's Representative		
Name	:	Mohd Ab Raouf bin Asis	Name	:	Foo Siew Theng		
Signature	:	4	Signature	:	trade III	_	
Date		24/06/2019	 Date		27 Jun 2010	_	

# **SUMMARY OF AUDIT**

Recertification audit							
On-site audit date	:	15-19 February 2016			No. of auditor days :	20 Auditor days	
Audit team	:		Mohd Razman Salim (LA), Mohd Zulfakar Kamaruzaman, Selvasingam T. Kandiah, Jagathesan a/l Suppiah				
No. of major NCR(s)	:	-   -   Closing date :			Closing date :		
No. of minor NCR(s)	:	-	-				
Indicate the	:	Emp	loyees	Settlers	Villagers	Employees	
stakeholders			Χ		X	X	
interviewed during the		Contract	workers	NGOs	Govt. agency	Contract workers	
on-site audit							
		Indigenous people		Contractor	Others (Please specify)		
			Χ	Х		x	
Supply base sampled		Hibumas	2 and Seka	ır Imej			

Annual Surveillance Audit 1						
On-site audit date	:	20-24 Ma	rch 2017		No. of auditor days :	15 Auditor Days
Audit team	:	Mohd Zul	fakar Kam	aruzaman (LA), Mo	hd Razman Salim, Ro	zaimee Ab Rahman
No. of major NCR(s)	:	-	Indicator			Closing date : -
No. of minor NCR(s)	:	2	Indicator	: 4.1.2 and 6.10.1		
Indicate by ticking the	:	Employee	es	Settlers	Villagers	Employees
stakeholders interviewed		X			X	X
during the on-site audit		Contract	workers	NGOs	Govt. agency	Contract workers
		Indigenou	ıs people	Contractor	Others (Please spec	ify)
		>	(	X		
Supply base sampled	:	Jebawang Estate and Sapi Sugut Estate				·
Changes since the last audit	:	Upgradeo	d capacity	of mill from 40mt/hr	to 60 mt/hr.	

Annual Surveillance Audi	t 2					
On-site audit date	:	12-16 Ma	rch 2018		No. of auditor days :	15
Audit team	:	Mohd Zul	fakar Kam	aruzaman (LA), Ro	zaimee Ab Rahman, Se	lvasingam T. Kandiah
No. of major NCR	:	2	Indicator:	: 4.7.2, 4.7.3		Closing date
						:5/6/2018
No. of minor NCR	:	1	Indicator:	: 4.7.7		
Indicate by ticking the	:	Employee	es	Settlers	Villagers	Suppliers
stakeholders interviewed		V			V	V
during the on-site audit		Contract workers		NGOs	Govt. agency	Independent growers
						V
		Indigenous people		Contractor	Others (Please specify)	
		N.	A	√		
Supply base sampled	:	Sri Kamu	san Estate	and Hibumas 1 Es	tate	
Justification of audit	:	Total allo	cation of a	auditor days for Sri Kamusan CU were:		
planning		Mill = 4 days (3 days for safety and health, environment, mill best practices, GHG				
		verificatio	n and Soc	ial at Mill) + (1 day	for supply chain certifica	ation systems)
		Sri Kamu	san Estate	e = 5 days each fo	r verification of safety a	and health, environment,
		good agri	culture bes	st practices, Social,	HCV and GHG verifica	tion.

	agriculture best practices, Social, HCV	rification of safety and health, environment, good and GHG verification plus the estate location is auditor did not enter due to sampling, take extra		
Changes since the last : audit	Mr Idrus waris promoted from Senior Assistant Manager to Manager and Transfer from Hibumas 1 to Sri Kamusan Estate. Mr Fadlee Yunsir Transfer from Sri Kamusan Estate to Hibumas 1 Estate.			
Report approved by :	Radziah Mohd Daud	Approval date : 11/06/2018		

Annual Surveillance Audit 3							
On-site audit date :	11-15 Ma	arch 2019		No. of auditor days :	18		
Audit team :			Asis (LA), Mohd Z oin Abdul Jalil (A)	Zulfakar bin Kamaruzama	an (A), Dzulfiqar bin Azmi		
No. of major NCR :	3	Indicator	: 2.1.1, 4.5.3 (c), 4	.5.4 (e & f)	Closing date : 14/06/2019		
No. of minor NCR :	2	Indicator	: 1.3.1, 5.3.3				
Indicate by ticking the :	Employe	es	Settlers	Villagers	Suppliers		
stakeholders interviewed		/		/			
during the on-site audit	Contract	workers	NGOs	Govt. agency	Independent growers		
	Indigono	us people	Contractors	Others (Please specif	5.0		
		us people IA	Contractors	Others (Flease specia	y) 		
Supply base sampled :	<u> </u>	., .	ı ıng, Sekar Imej an	d Sapi Sugut			
Justification of audit				Kamusan CU were:			
planning			•	alth, environment, mill b	est practices, GHG		
	verification	on and Soc	ial at Mill) + (1 day	for supply chain certification	ation systems)		
	Hibumas	2 Estate :	= 3.5 days each f	or verification of safety	and health, environment,		
			•	I, HCV and GHG verifica			
		•	•	•	nealth, environment, good		
	_	•		•	olus the estate location is		
				auditor did not enter du	e to sampling, take extra		
		mandays to verify everything.					
		Sekar Imej = 3.5 days each for verification of safety and health, environment, good					
	_	agriculture best practices, Social, HCV and GHG verification.  Sapi Sugut = 3.5 days each for verification of safety and health, environment, good					
		-	-	/ and GHG verification.	ealth, environment, good		
Changes since the last :					(+84.78 ha) following the		
audit			•	·	I using UAV Areal Survey		
		•	in December 2018	<u> </u>	,		
Report approved by :	Radziah	Mohd Dau	d	Approval date: 24	1/06/2019		

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

# **SUMMARY OF INFORMATION**

# TABLE 1

	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	February 2016 – January 2017	March 2017- February 2018	March 2018- February 2019	March 2019- February 2020	
Certified FFB Processed (MT)	321,670.00	302,322.33	149,669.33	154,549.33	
Production of Certified CPO (MT)	34,837.00	32,449.63	32,178.91	33,228.11	
Production of Certified PK (MT)	7,125.75	5,368.77	6,735.12	6,954.72	
Certified Areas (Ha)	14,258.10	14,258.10	14,258.10	14,258.10	
Planted Area (Ha) (Mature + Immature)	7,438.25	7,438.25	7,438.25	*7,523.03	
Production Area (Ha) (Planted – Immature)	7,438.25	7,438.25	7,438.25	*7,523.03	
HCV Areas	4,488.86	4,488.86	4,488.86	4,488.86	
REMARKS	*In January 2019, the planted area has been revised from 7,438.24 Ha to 7,523.03 Ha (+84.78 ha) following the latest Re-survey and GIS analysis exercise. Survey was conducted using UAV Areal Survey analysis and it was completed in December 2018.				

# TABLE 2

	РО	PK
Last years certified volume (MT)	32,178.91	6,735.12
Last years actual certified sold (MT)	14,000.13	4,714.90
Last years actual sold under other schemes (MT)	10,169.11	0.00
Last years sold conventional (MT)	0.00	0.00
New year certified volume (MT)	33,228.11	6,954.72

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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 recognized standards. Attestation of this fact is the accreditation of the various certification and testing services by leading national and international accreditation and recognition bodies such as the Department of Standards Malaysia (STANDARDS MALAYSIA), the United Kingdom Accreditation Services (UKAS) and the International Automotive Task Force (IATF). SIRIM QAS International is a partner of IQNet, a network currently comprising of leading certification bodies in Europe, North and South America, East Asia and Australia.

SIRIM QAS International has vast experience in conducting audits related to RSPO certification. It has certified more than a hundred palm oil mills and several estates to ISO 14001 & OHSAS 18001. SIRIM QAS International has also conducted many audits for sustainable production of palm oil products against the requirements of the RSPO P&C. SIRIM QAS International was approved by the RSPO as a RSPO certification body on 21 March 2008 and accredited by ASI on 27 September 2014.

#### 1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Mohd Ab Raouf bin Asis	Audit Team Leader / Safety, Partial Certification	Possessed B.Sc. (Hons) Management Technology Majoring Production and Operation from UTHM in 2007. He has been in the plantation industry for 7 years assisting Estate Manager managing palm oil estates. He is a qualified RSPO P&C and MSPO Lead Auditor.
Mohd Zulfakar bin Kamaruzaman	Auditor / HCV, Social	Holds a B.Sc. Forestry from Universiti Putra Malaysia. 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.
Dzulfiqar binAzmi	Auditor / Safety, Environment	Holds a B. Sc. in Agriculture from University Teknologi Mara (UiTM). He had more than 5 years of working experience in the oil palm operation. He is a qualified auditor for RSPO and MSPO.
Zulkarnain bin Abdullah	Auditor / Supply Chain	Holds B. Sc. Forestry from Universiti Putra Malaysia. Had more than 17 years of working experience related to wood related product. He has successfully completed the accredited Lead Assessor training for RSPO Supply Chain in 2014 and 2015.
Mohd Norddin bin Abdul Jalil	Auditor / Good Agricultural Practices	Holds a B.Sc.in Agriculture from Universiti Pertanian Malaysia. He has over 35 years working experience in the oil palm plantation operation. He is a qualified RSPO auditor.

#### 1.3 Audit methodology

The audit covered the Sri Kamusan Oil Mill and four of its supply bases. 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 were Hibumas 2 Estate, Jebawang Estate, Sekar Imej Estate and Sapi Sugut Estate. The audit included an on-site audit to the estates and mill to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

#### 1.4 Stakeholder Consultation

Stakeholder consultation was carried out during the on-site audit. In general, there was no negative comments made against this Certification Unit.

#### 1.5 Audit plan:

Refer to Attachment 2.

#### 1.6 Date of next audit:

The next surveillance audit will be conducted within 12 months but not sooner than 8 months from this audit.

#### 2.0 SCOPE OF CERTIFICATION AUDIT

#### 2.1 Description of the certification unit

The Sri Kamusan Palm Oil Mill (Sri Kamusan POM) certification unit (CU) is a wholly owned subsidiary company of PPB Oil Palms Berhad (PPB). The CU consisted of the Sri Kamusan POM and six of its estates, namely the Sri Kamusan Estate, Hibumas 1 Estate, Hibumas 2 Estate, Jebawang Estate, Sekar Imej Estate and Sapi Sugut Estate. The audit did not cover the independent smallholders that had been supplying fresh fruit bunches (FFBs) to the mill.

The Sri Kamusan POM commenced its operations in 2005 and currently had a capacity of processing 60 MT/hour of FFBs. Biogas plant is in progress and expected to be commissioned by 2018. The total combined land area of the six supply base is 14,258.10 hectares (Ha) of which 7,523.03 Ha had been planted with oil palm.

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

The FFB is sourced from company owned estates that were certified and smallholders and smallgrowers surrounding the Sri Kamusan CU.

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 (March 2018- Feb 2019)

Estates	FFB Prod	Certifying CB	
	Tonnes	Percentage (%)	cortinying ob
Sri Kamusan Estate	29,406.20	9.34	SIRIM
Hibumas 1 Estate	29,182.68	9.26	SIRIM
Hibumas 2 Estate	36,780.25	11.68	SIRIM
Jebawang Estate	8,411.94	2.67	SIRIM
Sekar Imej Estate	9,177.14	2.91	SIRIM
Sapi Sugut Estate	5,955.22	1.89	SIRIM
Total (certified)	118,913.43	37.75	
Outsiders (non certified)	196,094.01	62.25	
Overall Total	315,007.44	100.00	-

Table 2: Projected FFB production by the supply base for the next reporting period (March 2019- Feb 2020)

Estates	FFB Contribution	
	Tonnes	Percentage (%)
Sri Kamusan Estate	32,166.67	10.04
Hibumas 1 Estate	35,826.00	11.18
Hibumas 2 Estate	50,228.33	15.68
Jebawang Estate	7,500.00	2.34
Sekar Imej Estate	18,945.00	5.91
Sapi Sugut Estate	9,883.33	3.08
Total (certified)	154,549.33	48.24
Outsiders (non certified)	165,833.33	51.76
Grand Total	320,382.66	100.00

<u>Table 3: Actual FFB received and CPO & PK dispatch by the Sri Kamusan POM for the last reporting period</u> (March 2018- Feb 2019)

RSPO Supply Chain Model : Mass Balance	Total (MT)
FFB Received	315,007.44
FFB Processed	314,710.41
Certified FFB Processed	118,913.43
Non-certified FFB Processed	196,094.01
Crude Palm Oil (CPO)	
Overall CPO Production	63,950.66
Certified CPO Production	24,201.70
Certified CPO delivered as RSPO	14,000.13
Certified CPO delivered as non-RSPO	0.00
Certified CPO delivered under other sustainable schemes	10,169.11
Credits traded through Books and Claim	0.00
Palm Kernel (PK)	
Overall PK Production	12,522.38
Certified PK Production	4,789.89
Certified PK delivered as RSPO	4,714.90
Certified PK delivered as non-RSPO	0.00
Certified CPO delivered under other sustainable schemes	0.00
Credits traded through Books and Claim	0.00

<u>Table 4: Projected FFB received and CPO & PK dispatch by Sri Kamusan POM of next reporting period</u>
(March 2019 to Feb 2020)

RSPO Supply Chain Model : Mass Balance	Total (MT)
FFB Received	320,382.66
FFB Processed	320,382.66
Certified FFB Processed	154,549.33
Non-certified FFB Processed	165,833.33
Crude Palm Oil (CPO)	
Overall CPO Production	68,882.27
Certified CPO Production	33,228.11
Certified CPO delivered as RSPO	33,228.11
Certified CPO delivered as non-RSPO	0.00
Certified CPO delivered under other sustainable schemes	0.00
Palm Kernel (PK)	
Overall PK Production	14,417.22
Certified PK Production	6,954.72
Certified PK delivered as RSPO	6,954.72
Certified PK delivered as non-RSPO	0.00
Certified CPO delivered under other sustainable schemes	0.00

Table 5: Planted and certified area of the Sri Kamusan CU

Estate	Planted (ha)	Certified (ha)
Sri Kamusan Estate	1,665.76	2,832.00
Hibumas 1 Estate	1,775.58	2,449.38
Hibumas 2 Estate	2,303.42	3,472.62
Jebawang Estate	338.74	403.80
Sekar Imej Estate	891.49	3,642.00
Sapi Sugut Estate	548.04	1,458.30
Total	7,523.03	14,258.10

Table 6: Planting profile for Sri Kamusan Estate

Year of Planting	Planting Cycle	Maturity Status	Planted Area (ha)	Percentage of Planted Area
2000	1st Generation	Mature	408.37	24.52
2002	1st Generation	Mature	405.4	24.34
2003	1 <sup>st</sup> Generation	Mature	851.99	51.14
		Total	1,665.76	100.00

Table 7: Planting profile for Hibumas 1 Estate

Year of Planting	Planting Cycle	Maturity Status	Planted Area (ha)	Percentage of Planted Area
1999	1 <sup>st</sup> Generation	Mature	1,040.35	58.59
2000	1 <sup>st</sup> Generation	Mature	205.86	11.59
2001	1 <sup>st</sup> Generation	Mature	224.3	12.97
2004	1st Generation	Mature	121.89	6.77
2006	1 <sup>st</sup> Generation	Mature	119.24	6.86
2007	1 <sup>st</sup> Generation	Mature	63.94	3.28
		Total	1,775.58	100.00

Table 8: Planting profile for Hibumas 2 Estate

Year of Planting	Planting Cycle	Maturity Status	Planted Area (ha)	Percentage of Planted Area
2000	1 <sup>st</sup> Generation	Mature	513.45	22.29
2005	1 <sup>st</sup> Generation	Mature	792.47	34.4
2006	1 <sup>st</sup> Generation	Mature	916.65	39.8
2007	1 <sup>st</sup> Generation	Mature	80.85	3.51
		Total	2,303.42	100

Table 9: Planting profile for Jebawang Estate

Year of Planting	Planting Cycle	Maturity Status	Planted Area (ha)	Percentage of Planted Area
2003	1 <sup>st</sup> Generation	Mature	338.74	100
		Total	338.74	100

# Table 10: Planting profile for Sekar Imej Estate

Year of Planting	Planting Cycle	Maturity Status	Planted Area (ha)	Percentage of Planted Area
2004	1 <sup>st</sup> Generation	Mature	164.8	18.44
2005	1 <sup>st</sup> Generation	Mature	121.78	13.66
2007	1 <sup>st</sup> Generation	Mature	119.65	13.42
2008	1 <sup>st</sup> Generation	Mature	333.01	37.35
2009	1 <sup>st</sup> Generation	Mature	152.67	17.13
		Total	891.49	100.00

Table 11: Planting profile for Sapi Sugut Estate

Year of Planting	Planting Cycle	Maturity Status	Planted Area (ha)	Percentage of Planted Area
2004	1 <sup>st</sup> Generation	Mature	151.11	27.57
2005	1 <sup>st</sup> Generation	Mature	396.93	72.43
		Total	548.04	100

# 2.3 Organizational Information/Contact Person

The details of the contact person is as shown below: Sri Kamusan CU

Name	:	Mr. Colman Ng Pin Wah
Position	:	Group Manager
Address	:	Sri Kamusan CU
		KM 238 off Jalan Nangoh Pitas,
		Labuk Sugut, Sandakan,
		Sabah, Malaysia.
Phone no.	:	+089-259105
Fax no.	:	+089-259102
Email	:	colman.ngpinwah@my.wilmar-intl.com

3.0	AUDIT	FINDINGS
J.U	$\Lambda$	

N/A

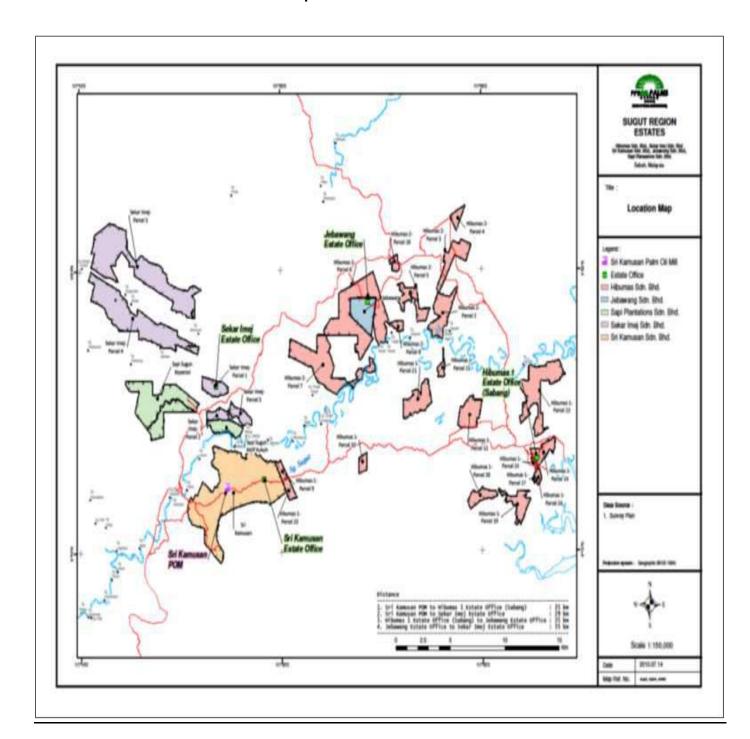
3.0	AUDIT FINDINGS					
3.1	Changes to certified products in accordance to the production of the previous year					
	There was no change to the certified products since last assessment.					
3.2	Progress and changes in time bound plan (Refer to Attachment 7 for the time bound plan)					
i.	Have all the estates under the parent company been certified? $\boxed{\ }$ Yes $\boxed{\ }$ No					
	If no, comments on the organization's compliance with the RSPO partial certification rules:					
	NA					
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 smallholders) in the CU	(including	scheme	Yes	√	No	
	If yes, have ALL the associated smallhold smallholders) where their fruit supply is ir its certification?			Yes	√	No	
	If no, please state reasons  Not applicable. There is no associated smallholders supplying FFB to the CU.						
iv.	Any new acquisition which has replaced primary forests or HCV areas Yes $\sqrt{}$ No						
	NA						
3.3	Other changes (e.g. organizational struct	ure, new cor	ntact persor	n, addresses, etc	.)		
	In January 2019, the planted area were following the latest Re-survey and GIS an Survey analysis and completed in December 1997.	alysis exerc					
3.4	Status of previous non-conformities *			√ Closed		Not closed*	
	* If not closed, minor non conformity will be upgraded to major non conformity						
3.5.	Complaint received from stakeholder (if any)						
	No complaints from stakeholders were ob	oserved.					
4.0	DETAILS OF NON-CONFORMITY REPO	ORT					
4.1	For P&C (Details checklist refer to Attach	ment 3) :					
	Total no. of minor NCR(s) (details refer to Attachment 4)	List: 2	DA 02 201	9, MZK 01 2019			
	Total no. of major NCR(s) (details refer to Attachment 4)	List: 3	DA 01 201	9, MAR 01 2019	, MA	02 2019	
4.2	For SC (Details checklist refer to Attachment 5):						
	Total no. of minor NCR(s) (details refer to Attachment 5)	List : -	N/A				
	Total no. of major NCR(s) (details refer to Attachment 5)	List :-	N/A				

5.0	AUDI	JDIT CONCLUSION					
	The audit team concludes that the organization has established and maintained its management system in line with the RSPO P&C requirements of the standard and demonstrated the ability of the system to systematically achieve agreed criterion & requirements.						
6.0	RECC	OMMENDATION					
		No NCR recorded. Recommended to continue	certification.				
8		Minor NCR(s) recorded. Corrective action plant NCR(s) to be carried out in the next audit.	an has been accepted. Verifi	cation of the			
		Note: Minor NCRs raised in the audit which are be upgraded to major NCRs .	not addressed in the subseque	ent audit shall			
		Major NCR(s) recorded. Evidence of implement provided and accepted by the audit team. The					
		Recommended to continue certification.					
[		Major NCR(s) recorded. Evidence of impleme provided but not fully accepted by the audit team closed out within 90 days of the audit. Recommendation	n. NCR(s) which have not beer	n satisfactorily			
		Note: Major NCRs which are not addressed within a further 90 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 L	.eader: MOHD AB RAOUF BIN ASIS	4	14/06/2019			
		(Name)	(Signature)	(Date)			

#### Attachment 1

# Map of Sri Kamusan CU



**Attachment 2** 

## **ANNUAL SURVEILLANCE AUDIT (3) 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 : 11 15 March 2019
- 3. Site of assessment : Sri Kamusan Certification Unit;
  - (i) Sri Kamusan Palm Oil Mill
  - (ii) Hibumas 2 Estate
  - (iii) Jebawang Estate
  - (iv) Sekar Imej Estate
  - (v) Sapi Sugut Estate
- 4. **Scope of certification** : Production of Sustainable Crude Palm Oil and Palm Kernel Using the

Mass Balance 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
  - (i) Trainee Audit Team Leader: Mohd Ab Raouf bin Asis (Safety, Environment)
  - (ii) Auditor i) Mohd Zulfakar bin Kamaruzaman (Social,HCV)
    - ii) Dzulfiqar bin Azmi (Environment, Partial Certificaation)
    - iii) Zulkarnain bin Abdullah (Supply Chain)
    - iv) Mohd Norddin Abd Jalil (GAP)

(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 : Please refer Attachment 1

Date / Time	Coverage of assessment / Activity / Site	Raouf	Dzulfigar	Zulfakar	Norddin	Zulkarnain
Day 1: 11 Mar	ch 2019 (Monday)					
8.30am – 9.15am	Opening Meeting – Venue: Sri Kamusan Palm Oil Mill  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	Site observation to Sri Kamusan POM P1, P2, P4, P5, P6, P8  • Verification of basic information mill & estate  • Confirmation of time bound plan & review of partial certification  • Occupational safety & health aspects, chemical management  • Environmental management, waste & chemical management  • Interview with workers, contractors etc.	/	/			
1.00pm – 2.00pm	Lunch Break / Zuhur prayer	/	/			
2.00pm – 5.00pm	Continue assessment at respective sites	/	/			
2.00pm – 5.00pm	Continue assessment at respective sites Site observation to Sri Kamusan POM RSPO Supply Chain 2017  RSPO Supply chain standard implementation including model requirements					/
Date / Time	Coverage of assessment / Activity / Site	Raouf	Dzulfiqar	Zulfakar	Norddin	Zulkarnain

Trav	arch 2019 (Tuesday) velling from KUL to Sandakan airport, ETA 1.10 pr use arrange transport to pick up from airport to ac		aroa			
8.30am –	Site observation to Jebawang Estate				I	
1.00pm	P1, P2, P3, P4, P5, P6, P7, P8  • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM,  • Environmental management, waste & chemical management  • New planting  • Occupational safety & health aspects, chemical management  • Interview with workers, contractors etc.	/	/			
	Site observation to Sri Kamusan POM P1, P2, P3, P4, P5, P6, P7, P8 • Social aspects - SIA, management plan & implementation, workers' quarters. • Land titles user rights • Stakeholder consultation with affected communities surrounding the CU • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc  RSPO Supply Chain 2017 RSPO Supply chain standard implementation including model requirements			/		/
1.00pm – 2.00pm	Lunch Break and Zuhur prayer					
2.00pm – 5.00pm	Site observation to Jebawang Estate P1, P2, P3, P4, P5, P6, P7, P8  • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM,  • Environmental management, waste & chemical management  • New planting	/	/	/		

	<ul> <li>Occupational safety &amp; health aspects, chemical management</li> <li>Interview with workers, contractors etc.</li> <li>Stakeholder consultation with affected communities surrounding the CU</li> <li>Interview with gender committee, safety committee, worker representative, contractors, supplier, etc</li> <li>Land titles user rights</li> <li>Inspection of protected sites with HCV attributes</li> <li>Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> </ul>					
Date/Time	Coverage of assessment / Activity / Site	Raouf	Dzulfiqar	Zulfakar	Norddin	
Day 3: 13 Mar	ch 2019 (Wednesday)					
8.30am –	Site observation to Sapi Sugut Estate					
1.00pm	P1, P2, P3, P4, P5, P6, P7, P8					
	Environmental management, waste &					
	chemical management	/	/			
	New planting					
	Occupational safety & health aspects,					
	chemical management					
	Interview with workers, contractors etc.					
	Site observation to Hibumas 2 Estate					
	P1, P2, P4, P5, P6, P7, P8					
	Land titles user rights     Sacial apparts SIA management					
	<ul> <li>Social aspects - SIA, management plan &amp; implementation, workers'</li> </ul>					
	quarters,					
	<ul><li>Interview with workers, contractors</li></ul>			/	,	
	etc.			,	<b>'</b>	
	Good Agricultural Practice such as					
	harvesting, weeding, spraying, EFB					
	mulching, POME application, IPM.					
	Stakeholder consultation with affected					
	communities surrounding the CU					

	<ul> <li>Interview with gender committee, safety committee, worker representative, contractors, supplier, etc</li> <li>Land titles user rights</li> <li>Inspection of protected sites with HCV attributes</li> <li>Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> </ul>				
1.00pm – 2.00pm	Lunch Break and Zuhur prayer	/	/	/	/
2.00-5.00 pm	Continue assessment at respective sites	/	/	/	/
Date/Time	Coverage of assessment / Activity / Site	Raouf	Dzulfiqar	Zulfakar	Norddin
Day 4: 14 Mar	ch 2019 (Thursday)				
8.30am –	Site observation to Hibumas 2 Estate				
12.30pm	P1, P2, P3, P4, P5, P6, P7, P8				
	<ul> <li>Environmental management, waste &amp;</li> </ul>	/	/		
	chemical management				
	New planting				
	<ul> <li>Occupational safety &amp; health aspects,</li> </ul>				
	chemical management				
	Interview with workers, contractors etc.				
	Site observation to Sekar Imej Estate				
	P1, P2, P4, P5, P6, P7, P8				
	Land titles user rights				
	Social aspects - SIA, management  plan % implementation, workers'				
	plan & implementation, workers' quarters,				
	<ul><li>quarters,</li><li>Interview with workers, contractors</li></ul>				
	etc.			/	,
	Good Agricultural Practice such as			,	,
	harvesting, weeding, spraying, EFB				
	mulching, POME application, IPM.				
	Stakeholder consultation with affected				
	communities surrounding the CU				
	<ul> <li>Interview with gender committee,</li> </ul>				
	safety committee, worker				

	representative, contractors, supplier, etc  Land titles user rights Inspection of protected sites with HCV attributes Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone				
12.30pm – 1.30pm	Lunch Break and Zuhur prayer	/	/	/	/
1.30pm – 5.00pm	Continue assessment at respective sites	/	/	/	/
Date/Time	Coverage of assessment / Activity / Site	Raouf	Dzulfiqar	Zulfakar	Norddin
Day 5: 15 Ma	rch 2019 (Friday)				
8.30am – 12.30pm	Site observation to Sekar Imej Estate P1, P2, P3, P4, P5, P6, P7, P8  Environmental management, waste & chemical management  New planting  Occupational safety & health aspects, chemical management  Interview with workers, contractors etc.	/	/		
	Site observation to Sapi Sugut Estate P1, P2, P4, P5, P6, P7, P8  Land titles user rights Social aspects - SIA, management plan & implementation, workers' quarters, Interview with workers, contractors etc. Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM. Stakeholder consultation with affected communities surrounding the CU Interview with gender committee, safety committee, worker representative, contractors, supplier, etc			/	/

	<ul> <li>Land titles user rights</li> <li>Inspection of protected sites with HCV attributes</li> <li>Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> </ul>				
12.30pm –	Lunch Break and Jumaat prayer	/	/	/	/
2.30pm					
3.00 pm -	<ul> <li>Verification on outstanding issues</li> </ul>	/	/	/	/
4.00 pm	Audit team discussion, preparation on audit				
	findings and issuance of nonconformity report				
	(if any)				
4.00 pm-	<ul> <li>Closing meeting – venue at Sri Kamusan</li> </ul>	/	/	/	/
5.00 pm	POM				
	<ul> <li>Presentation of audit findings, positive</li> </ul>				
	comment,				
	Question & answer				

# **Attachment 3**

# **RSPO P&C AUDIT CHECKLIST AND FINDINGS**

# Principle 1: COMMITMENT TO TRANSPARENCY

Clause	Indicator	s	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	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	Sri Kamusan CU continued to maintain a comprehensive system with respect to this criterion. Request Forms were available for stakeholders or interested party to obtain information related to RSPO. Records of visit by the Government agencies were also established. Sri Kamusan CU also continued to implement the procedure for responding to any communication as outlined in their RSPO System procedure. The procedure required the appointed person-in-charge to respond to all communication within a specified time frame. Action need to be taken to fulfil the request or for making decision. All communications were to be registered.
Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.2	Records of requests for information and responses shall be maintained.  Major Compliance	YES	Hibumas 2, Jebawang, Sekar Imej, Sapi Sugut and Sri Kamusan POM had continued to maintain a comprehensive system with respect to this criterion. Record of complaint and grievances were made available and details of complaints and grievances for all estates and POM were recorded in the Complaint Form, Request Form and Public Information Request (PIR) Form.
C 1.2 Management	1.2.1	Land titles/user rights (Criterion 2.2);	YES	Documents related to land titles for the estates were made available at the estate office. (Cross refer to 2.2)
documents are publicly available, except where this is		Occupational health and safety plans (Criterion 4.7);	YES	Safety & Health plan has been included in the 2017 EHS Plan. All programs related to Safety and Health specified in the 201 Plan have been carried out and their implementation were verified during the audit. In general, the programmes have been satisfactorily carried out.
prevented by commercial confidentiality or where disclosure of		Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8)	YES	SIA Management Action Plan 2018 was updated for mill and both Estate. The updated documents had included new actions plan which was developed based on meetings with stakeholders. Minutes of meeting was verified during the audit. Environmental Impact Assessment (EIA) Plan was updated for both Estate and Mill cross refer to 5.1 and 6.1
information would result in negative		HCV documentation summary (Criteria 5.2 and 7.3);	YES	HCV documentation summary titled 'HCV Documentation Summary for Sugut Region' was made available at the Sri Kamusan Estate and Hibumas 1 Estate. Cross refer 5.2
environmental or social outcomes.		Pollution prevention and reduction plans (Criterion 5.6);	YES	Pollution Prevention Plan 2018 has been established. Cross Refer to 5.6
		Details of complaints and grievances (Criterion 6.3);	YES	From the review, it was noted that there were no complaints or grievances recorded. Interviewed with workers also confirmed that the same. Details cross refer to 6.3
		Negotiation procedures (Criterion 6.4);	YES	The procedure entitled "Process for Identification of Legal and Customary Rights and Identifying People Entitled for Compensation" was established since November 2008. The procedure describes how to check for legal status of the lands in question and specified the criteria in deciding who should be compensated and the amount of compensation. Cross refer to 6.4

		Continual improvement plans (Criterion 8.1);	YES	The EIA Action Plan has been established. The requirement for continual improvement of its environmental performance has been addressed. Continual improvement plans were publicly available. Cross refer to Criterion 8.1.
		Public summary of certification assessment report;	YES	The public summary of the certification assessment report was available at SIRIM QAS website.
		Human Rights Policy (Criterion 6.13).	YES	A Wilmar Human Right Policy dated June 2014 signed by the Group Plantation Head and is available at Sri Kamusan Estate, Sri Kamusan POM and Hibumas 1 Estate. Communication on the policy was conducted during the contract briefing, muster briefing and training. The attendance list and pictorial reports were verified during the audit. Refer 6.13
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	NO	A written policy committing to a code of ethical conduct and integrity in all operations and transactions is available at Sri Kamusan POM, Hibumas 2, Jebawang, Sekar Imej and Sapi Sugut Estates. However, the policy committing to a code of ethical conduct was not communicated to all levels of the workforce. No evidence of code of ethical conduct has been communicated to all levels of the workforce at Sekar Imej Estate & Sapi Sugut Estate. Therefore, minor NCR on MZK 01 20-19 was issued.

# Principle 2: COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

Clause	Indicator	s	Comply Yes/No	Findings
C 2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1	Evidence of compliance with relevant legal requirements shall be available.  Major Compliance	NO	Sri Kamusan CU had continued to comply with the applicable local, national and ratified international laws and regulations. Relevant licences and permits such as MPOB license, Trading Licence and Domestic Trade Ministry for diesel and fertilizer storage were valid. Some relevant legal requirements checked were:  1) Factory and Machinery Act 1967 i) Person In Charge Regulation 1970 ii) Steam Boiler and Unfired Pressure Vessel 1970 iii) The Factories and Machinery (Notification, Certificate of Fitness and Inspection), Regulations, 1970 Regulation 10(2)) iv) Noise Exposure Regulations 1989 2) EQ (Prescribed Premise) Crude Palm Oil Regulations 1977 3) Scheduled Waste Regulations 2005 i) Regulation 3 (Notification of scheduled waste generated) ii) Regulation 9 (Storage of scheduled waste < 180 days) iii)Regulation 11 (Inventory of scheduled waste) 4) OSHA 1994, Use and Standards Of Exposure of Chemicals Hazardous to Health Regulations 2000 i)Regulation 27 (health surveillance programme) ii) Code of Practice in Confined Space 2010 (Medical Surveillance 2 years once)

	2.1.2	A documented system, which includes written information on legal requirements shall be maintained. Minor Compliance	YES	It was noted during the audit that in accordance with the Occupational Safety and Health (NADOPOD) Regulations 2004 - notification and reporting of accident and dangerous occurrence 5(2), it has been sighted that the Hibumas 2 estate has delayed the reporting to DOSH within 7 days regarding the accident that occurred in May 2018. Major NCR DA 01 2019 was raised.  Legal register of all applicable Act, Regulations and relevant sections of these Act and Regulations. Both Hibumas 1 Estate and Sri Kamusan Estate had a documented system for identifying, tracking, updating the changes of legal requirements and to monitor the status of legal compliance. Each estate had developed its Legal Register. There were evidences of compliance to legal requirements which has been evaluated on an annual basis.
	2.1.3	A mechanism for ensuring compliance shall be implemented. Minor Compliance	YES	The legal register has also been used as guidance in carrying out the periodic evaluation of compliance exercise. Through this exercise, the certification unit had information about the status of legal compliance. Appropriate action was taken for any non-compliance found. Based on the verification of this exercise, the assessor confirmed that most non-compliance found have been acted upon.
	2.1.4	A system for tracking any changes in the law shall be implemented. Minor Compliance	YES	Sri Kamusan POM and Both estates had the SOP for tracking changes in law. The Sustainability Department of PPB was the unit responsible to track changes in the legal and other requirements through various media such as internet, newsletter, etc. The changes/updates were then disseminated to the estates by the Sustainability Manager. The Sustainability Manager of PPB Oil Palm Berhad based in Sandakan was responsible in tracking any changes to the Acts and Regulations. This was carried out through communicating with the publisher of the documents. The updating of the legal register was carried out on a periodical basis. Any change in the legal register was communicated to all Units within PPB.
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	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	It has been verified that PPB Plantation has bought the land in 1990, as Country Lease. It was previously owned by Sabah Land Development and the land titles were for planting either oil palm or agricultural crops for economic value. It has been confirmed that PPB Plantation has the right to use the land which was legitimately owned by their company. Evidence of legal ownership of the land including history of land tenure was verified during this audit. Each estate was provided with legal use of the land through a Country Lease signed by the Director of Lands and Surveys of Sabah following the payment of premium. The documents were made available by all the individual estates. It was also verified that there was no history of customary land tenure, recognised NCR land.
or user rights	2.2.2	There is evidence that physical markers are located and visibly maintained along the legal boundaries particularly adjacent to state land, NCR land and reserves. Minor Compliance	YES	The physical markers along the perimeter adjacent forest reserve available and visibly maintained between Hibumas 2 Estate and Jebawang Estate and their HCV and the other neighbouring private oil palm companies and villagers. All the estates had maps to indicate the locations of the boundary pegs.
	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	YES	It has been verified that there was on-going dispute between Hibumas 2 and Kg. Banang, where the latter was encroaching into the land owned by Hibumas 2. During this audit in 2019, auditor has verified that Hibumas 2 and Jebawang Estate management still waiting for the land survey result/report from Kg. Banang. Auditor had made an effort to go to the village and meet the villagers. Unfortunately, their representative was not available.

		that these have been accepted with FPIC. Minor Compliance		
	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	There was no significant land conflict occurred at visited area for Sri Kamusan POM, Sapi Sugut, Sekar Imej and Jebawang Estate as verified by auditor during interview with Representative of Kg. Tampat, Kg. Sungai-sungai, Kg. Dampiron, Kg Kaibotan, Kg. Menonood except for Hibumas 2 Estate.
	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	For the land conflict at Hibumas 2 Estate, the company has conducted the inventory survey and marked estate boundaries in order to confirm the estate boundaries with Kg. Banang. Based on the completed map, it has been verified that the disputed land belonged to Hibumas 2 Estate.
	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	There was no conflict found due to action taken by Sri Kamusan POM, Sri Kamusan Estate and Hibumas 1 Estate to maintaining peace and order in their current and planned operations. Sri Kamusan CU has employed watchmen in order to guard of their workers, staffs, children, their belongings and company's property.
C 2.3 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.	2.3.1	Maps of an appropriate scale showing the extent of recognised legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).  Major Compliance	YES	Auditor has verified on land issue at Hibumas 2 Estate, where Wilmar still in process to develop map of encroached area. EHSH officers has monitored the area by monthly basis & found that no further encroachment until this audit in 2019.  There were no issues on customary or user rights at Sapi Sugut, Sekar Imej and Jebawang Estate during this audit and verified by auditor during interviews with the villages representative.
	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,	YES	A series of meeting minutes between Hibumas 2 Estate and representatives from Kg. Banang were verified by the auditor. Both parties has met and discussed on the land issue to find the best solution on the illegal encroachment by Kg. Banang. Communication with authority department such as land department and police have been made by Hibumas 2 Estate in order to solve the issue.

2.3.3	including information on the steps that shall be taken to involve them in decision making; 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; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. Minor Compliance  All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and	YES	As verified by the auditor, the land titled for Hibumas 2 Estate was valid. The assessments of impacts and proposed benefit sharing and legal arrangements still in process with series of discussion and meeting between Hibumas 2 Estate and Kg. Banang.
	assessments or impacts, proposed benefit sharing, and legal arrangements.  Minor Compliance		
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	Communities from Kg. Banang has been represented by their village head. The representatives were chosen by the communities.

# 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.	(minimum document appropriat	is or management plan three years) shall be sed that includes, where te, a business case for mallholders. inpliance	YES	Sri Kamusan CU continued to be committed to long-term economic and financial viability. The Estates had management plans in their current year's budgets and projections. The annual budgets and projections were prepared on an annual basis before the end of current year. The yearly budget and projections where the cost of production were reviewed annually and compared against expenditure for each year was an on-going process. The parameters monitored remained essentially unchanged and included Capital (CAPEX) and Operating costs. The operating expenditure included expenditure for Replanting, Mature and Immature Oil Palm upkeep, Administration cost, Housing and Machinery upkeep, allocation for sustainability implementation (environmental, social, occupational safety and health), infra-structure development (roads, etc.), and training, etc. The budget for 2018 and projections until year 2027 were made available to the auditors.
	projected years, with	I replanting programme for a minimum of five n yearly review, shall be Minor Compliance	YES	Since all the planting in both estates visited had palms of the 1 <sup>st</sup> generation and were planted between the years 1999 and 2007 therefore no replanting within the next 5 years. However, based on the estate's Long Range Replanting Program (LRPP) replanting had be planned until the year 2027.

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

Clause	Indicator	Indicators		Findings
C 4.1 Operating procedures are appropriately documented, consistently implemented & monitored	4.1.2	Standard Operating Procedures (SOPs) for estates and mills shall be documented.  Major Compliance  A mechanism to check consistent implementation of procedures shall be in place.  Minor Compliance	YES	As for all PPB Oil Palm Berhad estates, they continued to use their established SOPs: Wilmar International Limited, Agriculture Manual & SOP for Oil Palm, Safe Standard Operating Procedure for Oil Palm Plantations (SSOP), Safety and Health Manual and the Financial Manual - Wilmar International Plantation Malaysian Operations Standard Operating Procedures Checklist 2013.  The mechanism of ensuring consistent implementation was by Periodic reporting from operating units, on site visits, inspections and discussions with relevant personnel, Assessments and audits like Internal Audits, Group Inspectorate Manager (GIM) visits and by RSPO Audits and Consultation with RSPO team & management.
	4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. Minor Compliance	YES	Records of monitoring and the actions taken by both Hibumas 1 Estate and Sri Kamusan Estate were maintained and kept for a min. of 12 months. Monthly Costing Report and Annual Reports on monitoring of all activities were made available. Among those records sighted at the estates included Work Program Sheets, Field cost books for harvesting, weeding, Bin cards, Monthly Progress & Report Account, rainfall data, pest census, etc.
	4.1.4	The mill shall record the origins of all third-party sourced FFB. Major Compliance	YES	Sri Kamusan POM has also received crops from various sources i.e. mainly from surrounding private oil palm plantation and smallholders. There was no official agreement between both parties. The third party could send their FFB to Sri Kamusan POM or any other palm oil mill.

C 4.2 Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.	4.2.1	There shall be evidence that 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	Fertiliser application was of paramount importance for maintenance of soil fertility and the estates continued to apply fertilisers as per EMU recommendations made by Agronomist / Head of R&D Department.
	4.2.2	Records of fertiliser inputs shall be maintained. Minor Compliance	YES	Records of programs and applications of fertilisers were made available to auditors. Records sighted showed that actual applied in 2018 was in line with program.
	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/Head R&D reports it was established that the estates continued to carry out periodic foliar and soil sampling to monitor changes in nutrient status. Annual foliar sampling, had been carried out in both estates and the results formed the basis for the fertiliser recommendations to maintain and to improve soil fertility.
	4.2.4	A nutrient recycling strategy shall be in place, and may include use of EFB, POME, and palm residues. Minor Compliance	YES	Both estates had a nutrient recycling strategy in place. Palm fronds were stacked in the fields to decompose, by EFB application and decanter cake application.
C 4.3 Practices minimize and control erosion	4.3.1	Maps of any fragile/marginal soils shall be available. Major Compliance	YES	Based on the soil maps established by 3 <sup>rd</sup> party appointed, there were no fragile/marginal soils in both estates.
and degradation of soils.	4.3.2	A management strategy shall be in place for plantings on slopes between 9 and 25° unless specified otherwise by the company's SOP.  Minor Compliance	YES	Both estates continued to have in place management strategy for plantings on slopes between 9 and 25°. The procedure on land clearing and preparation for undulating to steep land had been covered in Wilmar International Limited, Agriculture Manual and Standard Operating Procedure 2011.
	4.3.3	A road maintenance programme shall be in place. Minor Compliance	YES	During the field visit, it was noted road conditions were well maintained and accessibility were made possible by regular maintenance guided by its road maintenance programmes which consist of road resurfacing, grading & compacting and culvert maintenance. The financial support for these programs were sighted in the annual budgets.
	4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. Major Compliance	YES	There were no peat soils in both Hibumas 1 Estate and Sri Kamusan Estate.
	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	There were no peat soils in both Hibumas 1 Estate and Sri Kamusan Estate.

	4.3.6	A management strategy shall be in place for other fragile and problem soils. Minor Compliance	YES	There was no management strategy as there were no peat soils in both Hibumas 1 Estate and Sri Kamusan Estate.
C 4.4 Practices maintain the quality and availability	4.4.1	An implemented water management plan shall be in place. Minor Compliance	YES	The water management plan was in place. The objective was to ensure sufficient water supply for workers residents and Introducing water conservation and increase awareness of the need to minimize water consumption.
of surface and ground water.	4.4.2	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones shall be demonstrated.  Major Compliance	YES	During interview with spraying operators at Sri Kamusan Estate and Hibumas 1 Estate all of them were understand and acknowledge that all riparian areas shall not been sprayed and that areas were marked with red paint colour for assist the spraying operator and prevent from over spray to riparian zone area.
	4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, shall be in compliance with national reg.  Minor Compliance	YES	An ETP was available at SKPOM to treat the POME. According to DOE's license, the disposal method of the final discharge was through land irrigation. 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.
	4.4.4	Mill water use per tonne of FFB shall be monitored. Minor Compliance	YES	Processing water obtained from water reservoir area. Monitoring of Water usage in mills being monitored accordingly.
C 4.5 Pests, diseases, weeds and invasive introduced species are effectively managed using	4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. Major Compliance	YES	Both estates had in place documented IPM plans which covered Monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides. The estates continued to carry out monthly detection and observation of leaf eating pests, mammalian pests and diseases like Ganoderma and Stem Rot. These monthly detection and observations were carried by staff. Monthly census records for Bag Worms, Nettle caterpillars and rat were sighted. Records showed no outbreak had been taken place.
appropriate IPM techniques.	4.5.2	Training of those involved in IPM implementation shall be demonstrated.Minor Compliance	YES	Training on IPM implementation was being carried out. Attendance records showed that the training was attended by senior and junior staff and workers.
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 demonstrated. The use of selective products that were specific to the target pest, weed or disease had been demonstrated in SPO Manual - SOPs on the use of Agrochemicals and Agriculture Manual and Standard Operating Procedure 2011.
	4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and	YES	Both estates continued to record areas where pesticides had been used. Pesticides are used only when justified and areas used are recorded in store issue chits, bin cards, program sheets, SAP System (System Applications and Products in Data Processing), costing records and progress reports. Records of pesticides used by area, quantity used, hectares applied and Ai/Ha from 2009 were available.

	number of applications) shall be		
4.6	provided. Major Compliance  3.3 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	The estates as per the IPM plan continued to manage pests, other than weeds, at below threshold levels. No prophylactic spraying had been carried on both estates. The estates in order to minimise pesticide usage, do not carry out calendar baiting of rats.
4.6		YES	All the pesticides used were those registered under the Pesticides Act 1974 (Act 149). The list of approved pesticides was available for reference. The list, entitled "Senarai Racun Makhluk Perosak Berdaftar" was sourced from Department of Agriculture Official Website <a href="http://www.doa.gov.my/web/guest/senarai racun perosak berdaftar">http://www.doa.gov.my/web/guest/senarai racun perosak berdaftar</a>
4.6	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	YES	Records showed that pesticides were handled by trained persons and used as per the MSDS/CSDS of the pesticide. As mentioned under Indicator 4.6.1, the estate had the SOPs for safe-handing of pesticides. Appropriate safety and application equipment had been provided and used as per the CHRA which was reviewed in June 2015 by appointed 3 <sup>rd</sup> party assessor. At the same time, the staff and workers such as the storekeepers, sprayers and those workers apply the fertilizer were trained and they had understood the hazards involve and how the chemicals should be used in a safe manner. Records of training were available for verification.

4.6.6	Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes. Pesticides shall be stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Reg and Orders, Pesticides Act 1974 (Act 149) and Reg. Major Compliance	YES	The chemical stores in all estates visited were observed to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations. The stores were equipped with exhaust fans and secured through locks which were kept by the respective store keepers. Only authorized personnel were allowed to handle the chemicals. The chemicals were stored and segregated accordingly and fertilizers were well stacked. Relevant MSDS/SDS were available in the stores. Adequate 'Safety Signage' have been placed in the stores. Proper premixing area and washing area were provided. It was noted that waste water from washing of chemical containers was directly pumped into the tank for spraying mixture. Bathing area for sprayers were provided. Triple rinsing of the empty pesticides containers was continually implemented. The rinsed containers were pierced and stored prior disposing. Record of the purchase, storage and use had been properly maintained.
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. Minor Compliance	YES	Application of pesticides was based on and guided by internal established procedure.
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. Major Compliance		Aerial spraying was not practiced at all Wilmar International Limited estates and there was no evidence to show that this has been carried out in all estates visited.
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	There was no associated smallholder at Sri Kamusan CU. Employees handling pesticide given knowledge and skill required to cover safe handling practices and standard operating procedures. Records of training were available for verification.
4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated.  Minor Compliance	YES	Safe and Standard Operating Procedure "31. Prosedur Operasi Standard Untuk Pelabelan, Pengendalian, Penyimpanan, Pemindahan dan Pelupusan Sisa Bahan Buangan Terjadual" has been established. Disposal of waste material related to pesticide containers were being carried out as per established procedures. Triple rinsing activities continually implemented for empty pesticide container.
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health	YES	CHRA Report was available. This assessment were carried out to identified and explain the finding of chemical health risk assessment carried out in the mill and estates. The General Exhaust Ventilation Examination and audiometric test has been carried out accordingly.

		conditions, shall be demonstrated.Major Compliance		
	4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women Major Compliance	YES	Pregnant and breast-feeding women are not allowed to work with Pesticides & Hazardous Chemicals.  All estates visited complied with this requirement as mentioned in the established SOP - "Penyemburan Racun Rumpai". The Medical Assistant (MA) conducted the check and determine whether female workers were pregnant on monthly basis.
C 4.7 An occupational health and safety plan is documented, effectively communicated and implemented.	4.7.1	An occupational health and safety policy shall be in place. An occupational health and safety plan covering all activities shall be doc and implemented, and its effectiveness monitored.  Major Compliance	YES	Occupational health and safety Policy has been established for new revision and endorsed by the Chairman and Chief Executive Officer in Apr 2015. 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 interviewed with employees showed that they generally understood the basic requirements of the policy.
The occupational health and safety plan shall cover the following:	4.7.2	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and 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) has been established on 26/04/2018 and properly documented and implemented to address identified issues.
	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 op, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. Major Compliance	YES	Training programme plan and carried out for the year 2019 include appropriate training on safe working practice for all categories of workers. The training programme included the various type of training such as firefighting, fire drill, exposed to high noise levels and control measure for protection of hearing and audiometric test, understanding SDS and first aid training.
	4.7.4	The responsible persons shall be identified. There shall be records of regular meetings between the responsible persons & 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	YES	OSH Committee has been established. The OSH committee organisation chart for 2018/2019 was available. The Mill Manager was the chairman and the Mill Engineer, the secretary. OSH Committee meetings were held once in three months. Minutes meetings reviewed and confirmed that among the agenda discussed, included the following: Passing of previous minutes and arising matters, Accident report (Monthly Accident statistics), Workplace inspection, Safety report and programme etc. The LTI was also being monitored and reported accordingly. Quarterly review on accident cases had been carried out during quarterly OSH committee meeting.

	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	Emergency Response Plan (ERP) was established. A revision on the ERT was made in 2015. Random interview with the estate workers showed that they were aware of accident and emergency procedures. Copies of procedures and telephone numbers were sighted on notice boards and muster grounds. During site visit, it was sighted Emergency Response Plan was available at Boiler Station, Chemical Store, Workshop and Lubricant Store. During interviews with workers it was noted that all workers understand regarding ERP. First aid trainings were conducted at estates and First Aid boxes were available at work operations in the field in all estates and mill. Site inspection evidence that first aid kit was available at all works place with complete contents. The stock of first aid box was regularly check and refill when necessary.
	4.7.6	All workers shall be provided with medical care, and covered by accident insurance.  Minor Compliance	YES	Local & Foreign workers were covered by SOCSO (Pertubuhan Keselamatan Sosial). The 'Jadual Caruman Bulanan' were reviewed accordingly.
	4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. Minor Compliance	NO	Sri Kamusan CU already established Lost Time Incident (LTI) summary for 2018/2019. Sighted the CU has maintained and updated the LTI Summary by monthly basis. JKKP 8 and JKKP 6 (where applicable) was submitted to DOSH accordingly, except for one case in Hibumas 2. Refer NCR DA 01 2019.
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 Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. Major Compliance	YES	Formal training programmes for 2019 covered all aspects of the RSPO Principles and Criteria. Regular assessments of training needs were presented to auditors by the Sri Kamusan CU. Year 2019 Training Plan was established in 30/01/2019 for staff and workers was establish. A training needs identification matrix has been established with target dates for the training to be conducted. The training program includes: Awareness, Safety and health training, Chemical handling, Environment aspect training etc.
	4.8.2	Records of training for each employee shall be maintained. Minor Compliance	YES	Records of training conducted were available.

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

Clause	Indicators		Comply Yes/No	Findings
C 5.1	5.1.1	An environmental impact	YES	Sri Kamusan CU has established procedure for SOP for Environmental Impact Assessment
Aspects of plantation		assessment (EIA) shall be		Procedure titled "Identification of Environmental Aspects and Evaluation of Environmental Impacts".
and mill management,		documented.		Environmental aspect and impact (EAI) which covers form upstream activities such as FFB
including replanting,		Major Compliance		reception until downstream processes was sighted during assessment and established for

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.	5.1.2	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 persons. Minor Compliance	YES	2018/2019. Identification and evaluation of environmental impact was done for all activities and processes related to the mill and estates operation.  Sri Kamusan CU has established EIA Management Action Plan 2019. The plan includes the impact parameter, issue, proposed action, location, PIC, timeline and progress/remarks. No changes were made to the environmental aspects and impacts or current practices which require changes in the environmental action plans.
	5.1.3	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.  Minor Compliance	YES	The monitoring of the documented environmental management plans was ongoing. Implementation and monitoring of the documented environmental management plans will be reviewed on annual basis. The review will take into consideration the mitigation of negative impacts and promotion of positives ones such as the monitoring of buffer zone, scheduled waste management and etc.
C 5.2 The status of rare, threatened or endangered species other HCV habitats, if any, that exist in the	5.2.1	Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations.MajorCompliance	YES	As reported in the previous surveillance audit, a report on HCV sites within the CU had been prepared. The High Conservation Value Assessment Report dated Sept 2010, had identified the HCV sites for each of the six estates. A public consultation was held in June 2010 where members of the local communities were represented in the meeting to discuss the findings in the report. An Action Plan for HCV Report was also prepared. The total area for HCV in the Sri Kamusan CU was 4,488.86 ha.
plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained	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	A summary of management actions had been proposed in the HCV Assessment Report. 'HCV Monitoring & Action Plan 2015-2019' had been established for Jebawang/Hibumas 2 Estate and Sapi Sugut/Sekar Imej. Latest review of HCV Action Plan for Jebawang/Hibumas 2 Estate was in March 2019.
and/or enhanced.	5.2.3	There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate	YES	There was no RTE species identified at Jebawang/Hibumas 2 Estate and Sapi Sugut/Sekar Imej Estate. However, Jebawang/Hibumas 2 Estate and Sapi Sugut/Sekar Imej Estate still conducting HCV refresher training and the estates plan to do for all workers in March 2019.

		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		
	5.2.4	Where an action plan has been created there shall be ongoing monitoring:  The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported;  Outcomes of monitoring shall be fed back into the action plan.  Minor Compliance	YES	Records on monthly monitoring was verified during the audit. The HCV monitoring records using 'Borang Monitoring HCV Sabah' for month of Jan & Feb 2019 at Jebawang and Hibumas 2 Estate was sighted, monitoring was done accordingly. Observed that signage had been erected at each estate to ban hunting. The entrances to each estate had gates and guarded by the security staffs. Regular patrols had been conducted and reported on the protection of these HCV sites. The staff and workers were also consulted on this and they were aware of the responsibility to protect endangered, rare and threatened species of forest flora and fauna in their areas. There were also posters put up at all estates offices.
	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 were no HCV set-asides with existing rights of local communities at Sapi Sugut, Sekar Imej, Jebawang and Hibumas 2 Estate. Therefore, this indicator was not applicable.
C 5.3 Waste is reduced, recycled, re-used and disposed of in an environmentally and	5.3.1	All waste products and sources of pollution shall be identified and documented. Major Compliance	YES	Sri Kamusan CU, sighted Waste and Pollution – Identification, Prevention, Mitigation and Improvement Plan that applicable for both mill and estate. The mill and estates have identified and documented type of waste that generated from its operation in a Waste Management Plan 2019. The waste management plan has also identified source of pollution, possible waste/pollution, effected environment, prevention, mitigation and enhancement.
socially responsible manner.	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 was 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 Sri Kamusan 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	NO	Sri Kamusan CU has compiled Environmental Aspects and Impacts Identification and Risk Assessment for each activity and updated every year. The last up date was made in Jan 2019. The company has also compiled an Environmental Management Plan in an effort to minimize the environmental impacts identified in Environmental Aspects and impacts identification and risk assessment.

				Waste management and disposal plan to avoid or reduce pollution had been documented and implemented. Procedures and guideline were used to guide the waste disposal activities and to reduce pollution during routine operation.  On the monitoring of water and effluent discharge, monthly and quarterly report for final discharge were submitted to DOE timely, as required by the written approval. Effluent quality monitoring was also done on a monthly basis, with samples taken at final discharge point and sent for analysis. Results of laboratory showed that the discharges were within permissible limits. However, waste management and disposal plan was not effectively implemented and monitored. During site visit at landfill Jebawang, Hibumas 2, Sekar Imej and Sapi Sugut Estate, sighted plastic glass bottle, aluminium can, and lamp bulb were not segregated accordingly. Thus, minor NCR DA 02 2019 was raised.
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	Sighted "Fossil Fuel Reduce/Optimize Plan Programme 2019". Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It was monitored to optimise use of renewable energy. Data was being compiled for comparison and control for future improvement.
C 5.5 Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN	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	All palms in all estates were planted between the years 2000 to 2009 and as such no land preparation/replanting had taken place in all estates. Wilmar Environmental Policy clearly states on the "Practice of Zero Burning'. Wilmar International Limited Agriculture Manual & SOP For Oil Palm, advocates Green Stacking (Zero Burning) for land clearing and preparation. The CU adhered to the policy as per the Agricultural Manual and SSOP which advocates zero burning. All previous crop were felled, chipped/shredded, shredded, windrowed and left to decompose.
guidelines or other regional best practice	5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003.  Minor Compliance	YES	All palms in all estates were planted between the years 2000 and 2009 and as such no land preparation/replanting had taken place in all estates. Wilmar Environmental Policy clearly states on the "Practice of Zero Burning'. Wilmar International Limited Agriculture Manual & SOP. For Oil Palm, Chapter 3(1) Item 4 advocates Green Stacking (Zero Burning) for land clearing and preparation. There was no evidence of fire had been used at the visited estates. All palms were chipped and left decomposed at field.
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	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 was being done online using the CEMS and supported by Ringelmann Smoke Charts. Report show evidence that the emission was within the permissible limits of DOE as verified by document made available during on site visit to the Sri Kamusan POM. POME treatment, monitoring and land application was 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. BOD analysis was conducted on a monthly basis and result confirmed it was below the allowable limit as per DOE specification. Water analysis, both raw and treated water, conducted every months and send for testing. Based on the result, water quality monitoring is generally within WHO at all monitoring points.

completely or measured accurately with current knowledge and methodology. It is also recognized that it is not always feasible or	5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. Major Compliance A monitoring system shall be in place, with regular reporting on	YES	farm tractor and gen emission by daily ins and problem that cou and reported in the F	set operation. The map pection and monitorinuld adverse impact the	anagement from al ng for their farm tra e environment., Fu Report.	Il estates and mill actor and gen set let Consumption,	as emission from their had planned to reduce to prevent any leakage Peat Oxidation, POME tion 2
practical to reduce or		progress for these significant			T	$\neg$		
minimise these		pollutants and emissions from		Description	tCO₂e/tProduct	_		
emissions.		estate and mill operations, using		CPO	0.45			
Growers and millers		appropriate tools.		PK	0.45			
commit to an implementation period		Minor Compliance				<b>=</b>		
until the end of				Production	t/yr			
December 2016 for promoting best				FFB Processed	304678.490			
practices in reporting				CPO Processed	61813.686			
to the RSPO, and								
thereafter to public				Land Use		На		
reporting. Growers and millers make this								
commitment with the				OP Planted Area		7143.46		
support of all other				OP Planted on Pe	at	0.00		
stakeholder groups of				Conservation (fore	ested)	4419.29	1	
the RSPO. Plans to reduce				Conservation (non	-forested)	41.42		
pollution and				,	10100004)	11604.17		
emissions, including				Total		11604.17		
greenhouse gases,				Milling extraction rate	e:			
are developed,				OER	20.29 %			
implemented and monitored.								
monitored.				KER	4.00 %			
				Mill Emission				
					Own Cro	ор		
				<b>Emission source</b>		tCO2e	tCO2e/tFFB	
				POME		4863.90	0.02	
				Fuel consumption		500.88	0	
				Grid electricity utilis	sation	0	0	
				Credits Export of exces	s electricity to	0	0	
				housing & grid	s electricity to	0	0	

RSPO	PUBLIC S	SUMMARY	REPORT
KOPU	PUBLIC (	SUIVIIVIAR I	REPURI

	Sale of PKS	0	0	
	Sale of EFB	0	0	
	Total	5364.78	0.02	1
	Plantation / field emission			
	Furiarian assuran	Own Crop	1000-11	1000-/EED
	Emission sources	tCO2e	tCO2e/ha	tCO2e/FFB
	Land Conversion	75471.64	10.57	0.67
ļ	*CO2 Emissions from Fertiliser	5318.56	0.74	0.05
	**N2O Emissions	5509.56	0.77	0.05
	Fuel Consumption	3538.62	0.49	0.03
	Peat Oxidation	0	0	0
	Sinks	0	0	0
	Crop Sequestration	-61537.32	-8.61	-0.55
	Conservation Sequestration	-32713.81	-4.58	-0.33
	Total	-4412,45	-0.62	-0.08
	Palm Oil Mill Effluent (POME) Treate		C	%
	Diverted to anaerobic of	digestion	10	0%
	Diverted to Anaerobic Digestion			
	Diverted to anaerobic	c pond	C	1%
	Diverted to methane captu	ure (flaring)	7:	5%
	Diverted to methane capture (ele	ctricity generation)	2	5%

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

Clause	Indicator	s	Comply Yes/No	Findings
C 6.1 Aspects of plantation and mill management that have social	6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. Major Compliance	YES	The SIA report entitled "Impact Assessment for Sugut Region Estates (PPB Oil Palms Berhad), Beluran, Sabah, Malaysia – "Sri Kamusan Estate and Mill Social Impact Assessment Report", and "Hibumas 1 social impact assessment report" was prepared in October 2010 by the appointed consultant. The report was prepared with the participation of the relevant stakeholders.
impacts, including replanting, are identified in a participatory way, and	6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. Major Compliance	YES	Based on the records available, there was evidence that the assessment was done with participation of all affected parties/stakeholders from contractors/suppliers, government departments and local communities, whose attendance was documented and sighted during the audit.
plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.  6.1.3  Plans for avoidar of negative promotion of the and monitoring identified, shall be consultation with parties, doc & responsibilities&i	promotion of the positive ones,	YES	Stakeholders meeting were held by the CU to get inputs for reviewing and updating the SIA Management Action Plan 2019. The action plan had documented i) Impact parameter, ii) Issue, iii) Proposed plan, iv) Location, v) Person in charge, vi) Timeline and vii) Progress. Stakeholder meetings were conducted in Feb 2019 for Sri Kamusan POM and Jebawang, while Hibumas 2, Sekar Imej and Sapi Sugut in Mar 2019.	
	6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. Minor Compliance	YES	The plan was reviewed on yearly basis and updated as necessary. In some cases where the review had concluded that changes should be made to current practices. The SIA management action plan (external and internal) was reviewed accordingly and the review was conducted with the participation of affected parties such as local communities and contractors.
	6.1.5	Particular attention shall be paid to the impacts of smallholder schemes. Minor Compliance	YES	For the time being, there was no smallholder schemes for Sri Kamusan CU. Only independent grower and nearby villagers at Sri Kamusan CU were sending their FFB to Sri Kamusan POM.
C 6.2 There are open and transparent methods for communication and consultation between growers and/or millers, local	6.2.1	Consultation and communication procedures shall be documented. Major Compliance	YES	Consultation and communication procedures used by the CU in handling internal and external communications was identified as in the Consultation and Communication Procedure, prepared by the RSPO Unit of PPB Oil Palms Bhd. The CU has continued to use the internal communication through morning assemblies, notice boards and posters, suggestion boxes and complaint forms. External communication has been mainly through mail correspondence. The CU has also use the Stakeholders Meeting to serve as a forum to discuss issues of interest to the mills, estates, local government agencies and local communities (villagers).

communities and other affected or interested parties	6.2.2	A management official responsible for these issues shall be nominated. Minor Compliance	YES	The Group Manager has appointed management officials to take charge regarding the consultation and communication with internal and external 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	The stakeholders list has been updated accordingly. Evidence of communications, complaints, grievances, disputes etc. with internal and external stakeholders could be tracks in the stakeholders meeting files which kept by the estate/mill. Files on external communication were kept according to the agencies or parties communicated, for examples, Department of Safety and Health, and Department of Environment, and so forth. And, records of action taken had been highlighted in the SIA Management Action Plan.
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	In the event of a dispute, complainants and whistleblowers, the CU will manage it through the "Whistle Blowing Policy" and "Dispute and Resolution Procedure". The procedure starts with the receipt of complaint from any party, its investigation, proposed solutions and acceptance of the solutions or otherwise. If the proposed solution was rejected, the dispute will be brought for third party arbitration. Grievance or dissatisfaction and request for services on the part of the employees can be conveyed through the "Borang Aduan (Complaints Form)", the "Borang Permohonan (Request Form)". PPB Oil Palms Berhad had established a standard operating procedure on 'Grievances and Complaint'.
accepted by all affected parties	6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. Major Compliance	YES	There was no grievances/complaints from employees except for their house maintenance as verified through Complaint Form. Housing complaints from workers have been handled quite satisfactorily by the estate/mill.
C 6.4 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt	6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. Major Compliance	YES	A procedure for identifying legal and customary rights and a procedure for identifying people entitled to compensation were established. In the event, cases involving the loss of customary land rights, the estate will manage them using the procedure entitled "Process for Identification of Legal and Customary Rights and Identifying People Entitled for Compensation". Essentially, the procedure describes how to check for legal status of the lands in question and lays out the criteria in deciding who should be compensated and the amount of compensation.
with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) 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-	YES	As mentioned in 6.4.1, the procedure has addressed the determination of compensation. The process and outcome of any compensation claims is documented and made publicly available. However, there was no issue other than land claims involving the estate or mill.

	6.4.3	established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. Minor Compliance  The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. Major Compliance	YES	There was no issue raised related to the compensation claims at Sri Kamusan CU since last audit in 2018. Therefore, this indicator was not applicable.
C 6.5 Pay and conditions for employees and for contract workers	6.5.1	Documentation of pay and conditions shall be available. Major Compliance	YES	Pay slip for sprayer, manurer and harvester were verified by audit team. Their wages had followed Minimum Wages Order 2018 where they have been paid at RM42.31 per day with total of RM1100 per month (minimum). Employee's payslip (foreign worker for sprayer, manurer and harvester for January, February 2019 and employment agreement had been checked and verified.
always meet at least legal or industry minimum standards and are sufficient to provide decent living wages	6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. Major Compliance	YES	Contracts for local and Indonesian foreign workers at Jebawang Estate, Hibumas 2 Estate, Sekar imej Estate, Sapi Sugut Estate and Sri Kamusan POM were sampled. The terms and conditions of employment are contained in the employment contracts and include duration of employment, place of work, salary, working hours, medical benefits, accommodation, annual leave, sick leave, termination of service, and other benefits provided (housing, employment cost, etc). For contracts that were prepared in English, explanation and briefing were given to the workers prior to signing. This was further confirmed by the workers during interviews.
	6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, in accordance with Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446) or above, where no such public facilities are available or accessible. Minor Compliance	YES	The CU maintains to provide housing to the workers and provide subsidy for water and electricity consumption. Religious, medical, educational (Humana School and child care facilities – Creche Ayah) are also maintained to be provided. Any maintenance and service for worker's housing and facilities can be requests from mill and estates management with free of charge. During interview with local and foreign workers at the Jebawang Estate, Hibumas 2 Estate, Sekar imej Estate, Sapi Sugut Estate and Sri Kamusan POM, noted that the workers were satisfied with the accommodation and other facilities provided to them.
	6.5.4	Growers and millers shall make demonstrable efforts to monitor and where able, improve	YES	Hibumas 2/Jebawang Estate has monitored adequacy of the food availability and the price of 3 sundry shops. The latest monitoring was on Dec 2018.

C 6.6 The employer respects the rights of all personnel to form	6.6.1	workers' access to adequate, sufficient and affordable food. Minor Compliance A published statement in local languages recognising freedom of association shall be available. Major Compliance	YES	An official policy on Human Right was published, written in English and Bahasa Malaysia. The policy was made available in public places at the estates and mill.
and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. Minor Compliance	YES	As reported in previous audit, the workers were not unionised. However, workers' representatives have been appointed as members of the Social and Welfare Committee and Women and Children Committee through election in the estates and mill.
C 6.7 Children are not employed or exploited.	6.7.1	There shall be documentary evidence that minimum age requirements are met.  Major Compliance	YES	The child labour policy was publicly available at the visited estates and mill. The policy statements emphasis on child under 18 years must not be employed. This policy was posted on notice boards for the understanding of the public and workers.
C 6.8  Any form of discrimination based on race, caste, national origin, religion, disability,	6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented.  Major Compliance	YES	The equal opportunity policy (dated Sept 2010 updated on Jan 2018) was publicly available at all estates and POM. The policy statements emphasised on worker information, recruitment and selection, training, employee development, terms of service and records of service. The policy was posted on all notice boards both estates and mill for the understanding of the public and workers.
	6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against.  Major Compliance	YES	The terms of employment, work assignments, housing policy and other requirements have not been found to be discriminatory. Interviews with workers at the Jebawang Estate, Hibumas 2 Estate, Sekar imej Estate, Sapi Sugut Estate and Sri Kamusan POM revealed that the CU has not discriminated its staffs and workers. Foreign workers have received similar pay rate, stay in the same house, and enjoy similar medical benefits as their local counterparts. A functioning grievance mechanism is in place. The Social and Welfare Committee and Gender Committee also looks into allegation of discrimination if reported.
	6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion where relevant are based on skills, capabilities,	YES	Sri Kamusan CU had demonstrated that recruitment selection, hiring and promotion where relevant are based on skills, capabilities, qualities, and medical fitness necessary for the jobs was available in "Recruitment selection, Hiring and Promotion" for staff and "Recruitment of Workers" for workers.

		qualities, and medical fitness necessary for the jobs available. Minor Compliance		
C 6.9 There is no harassment or abuse in the work place, and reproductive rights are	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	The CU had established policy on sexual harassment. The policy had also been communicated to all staffs and workers during morning muster. The CU had also conducted awareness training to prevent sexual harassment occurred at their mill and estates.
protected.	6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce.  Major Compliance	YES	The CU has established policy on reproductive rights which given their employee i) to decide freely and responsibly of their planning to have children, and ii) to make decisions concerning reproduction free of discrimination, coercion and violence. Both policies, Sexual harassment and Reproductive rights were displayed at the visited estate, mill, clinic and worker's quarter noticeboard. Based on interviews with female workers during the audit found that they were aware of the policy and had been briefed during Gender Committee Meeting. The policy had been communicated to all staffs and workers during morning muster. The Women and Children Committee had organised appropriate programmes and activities for their members.
	6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, & communicated to all levels of the workforce.  Minor Compliance	YES	Sri Kamusan CU has followed standard operating procedure for handling of grievances / social issues. The SOP titled as 'Anti Sexual Harassment' provided the reporting form called the 'Grievance/Complaint Form for Sexual Harassment'. The chairman of the Women and Children Committee as mentioned in 6.9.1 was responsible in managing any issue raised on sexual harassment. The grievance mechanism had been explained to the committee. The flowchart procedure had been displayed at the visited estates and mill noticeboard.
C 6.10 Growers and millers deal fairly and transparently with	6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. Minor Compliance	YES	Sri Kamusan POM has displayed daily prices for FFB (Grade A, B and C) at the weighbridge station and also the past price since January 2019.
transparently with smallholders and other local businesses.	6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). Major Compliance	YES	A Stakeholders Committee meeting was held in Feb 2019 for Sri Kamusan POM to discuss issues on pricing and contracts. The meeting was chaired by the Mill Manager. Members of the committee included the representatives from purchasers and suppliers of FFB. Issues related to FFB transaction were raised and discussed in the meeting. The minutes of the meeting 'Minit Mesyuarat Stakeholders' was made available to the auditor.
	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	For third party suppliers, there was no agreement or contract between the mill and the third party FFB suppliers as verified during Interview with nearby villages' representative.

C 6.11	6.10.4	Agreed payments shall be made in a timely manner. Minor Compliance Contributions to local	YES	Based on interview with contractor, the audit team was informed that any payments to supplier and contractor were made in a timely manner, i.e. at every 10 <sup>th</sup> of the month. If the payment cannot be paid as agreed, the estate and mill clerk will inform them first.  Sri Kamusan CU had initiated consultations with the neighbouring external communities regarding
Growers and millers contribute to local Sustainable development where appropriate.		development that are based on the results of consultation with local communities shall be demonstrated. Minor Compliance	YES	contribution to local development. Usually the villagers through their head will communicate with management on ad-hoc basis.
	6.11.2	There are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity.  Minor Compliance	YES	There were no scheme smallholders at Sri Kamusan CU.
C 6.12 No forms of forced or trafficked labour are used.	6.12.1	There shall be evidence that no forms of forced or trafficked labour are used.  Major Compliance	YES	There was no evidence of trafficked labour used in the CU.
	6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred.  Minor Compliance	YES	There was no evidence of contract substitution occurred as stated in the labour policy and procedures was established and implemented as Recruitment of Workers". The interviewed workers have confirmed that the agreement type of work and salary offered were same.
	6.12.3	Where temporary or foreign workers are employed, a special labour policy and procedures shall be established and implemented. Major Compliance	YES	A special labour policy and procedures was established and implemented as Recruitment of Workers" to employ foreign workers.
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 (see Criteria 1.2 and 2.1).  Major Compliance	YES	A Wilmar Human Right, was verified at Sri Kamusan POM, Jebawang Estate, Hibumas 2 Estate, Sekar imej Estate and Sapi Sugut Estate. Awareness briefing for all levels of the workforce was conducted .The attendance list and pictorial report was verified during the audit.
	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	8 Humana and 7 Creche were constructed at Sri Kamusan CU to secure workers children access to education as moral obligation. Site visit to Humana School also found the infrastructure was well maintained and play ground was provided by Wilmar.

### Principle 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

Sri Kamusan CU has no plan for any new planting and new development of area. This has been observed during the visit. Auditors has verified through checking the <a href="https://www.globalforestwatch.com">www.globalforestwatch.com</a>, GOOGLE Maps, Estate Maps and also through site visit to the estates area.

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

Clause	Indicator	s	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: Major Compliance		
	a)	Reduction in use of pesticides(Criterion 4.6);	YES	Both estates have introduced a mechanized rotor slashing weeding in all young palms possible areas to reduce the use of chemicals for spraying.  The estates continued to manage pests, disease and weeds using appropriate IPM techniques. In order to minimize use of insecticides, the estates had established nurseries for beneficial plants mainly <i>Tunera subulata</i> , <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> . This was to establish continuity in the planting of beneficial plants. In order to reduce the use of rat baits to control rats, Rat baiting is carried out only when rat damage census showed above threshold level.  Both estates were committed to reduce using of chemicals and now have implemented and will continue to only spray Circles (Strip) and noxious weeds. Soft weeds and <i>Nephrolepis bisserata</i> were planted, maintained and encouraged in the inter rows. Where possible, harvester's paths were grass cut.  The estates in replants with flat areas advocated that chipped palm materials be stacked in Close Ended Conservation Trenches (CECT), which will contain water, in order to minimise/prevent breeding of Rhinoceros Beetle, thus reducing chemical control. To further control the Rhinoceros Beetle, the estates used pheromone traps and had programs to cover trunk chips in replants with cover crops. EFB was applied in single layers and was not dumped in large amounts to prevent breeding of Rhinoceros Beetle. To control the Bagworm, the estates have planted more nectariferous beneficial plants. This was evident with the presence of polybag young plants in the

				nurseries. This action have reduced the use of chemical. The CU also ensure efficient loose fruit collection and expedite circle raking to avoid VOPs.
	b)	Environmental impacts (Criteria 4.3, 5.1 and 5.2);	YES	The CU maintained efforts to improve continuously its environmental management. Among the relevant plans and measures were: reduction of diesel usage / GHG emission, reduction of POME generation, maintain water quality, reduce soil erosion, reduce usage of chemical, reduce land contamination, improve soil fertility, reduce waste, installation of biogas plant.
	c)	Waste reduction (Criterion 5.3);	YES	Among the type of wastes are agricultural organic wastes, rubbish, used oils, used batteries, empty pesticide containers, clinical waste, scrap iron, wastewater, etc.  Non-reusable empty chemical containers were disposed as per relevant requirements of scheduled wastes. Reusable agrochemical containers were used for collecting of triple-rinsing wastewater. Scheduled wastes were labelled with relevant information and hazard sign, and disposed to DOE's licensed contractor.
	d)	Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);	YES	The CU continued to establish and implement GHG emission reduction plan. Among the plan implemented were, installation of biogas plant to generate electricity for housing complex, and periodical maintenance of tractor and power generator, application of organic material (biomass) as fertiliser.
	e)	Social impacts (Criterion 6.1);	YES	The Sri Kamusan CU continued to improve the social impacts with activities like: retention incentive for foreign workers, constructing new workers quarters, Kindergarten, Humana, constructing new hall and Badminton Court, organizing social events for worker and communities, such Family Day, maintenance of village road, build kindergarten for villagers, maintenance of local community house.
	f)	Encourage optimising the yield of the supply base	YES	As both estates were part of a well-established organization, yield performance has always been the top priority in ensuring long-term economic and financial viability. Various efforts have been carried out to optimise the yield of the plantation. These included the following: selection of good planting material, maintaining optimum stand per hectare, minimising crop losses, ensuring the soil fertility is maintained by timely and proper application of fertilisers, EFB application in marginal soil areas, maintaining transportation facilities in good condition for efficient crop evacuation.

### RSPO CERTIFICATIONS SYSTEMS FOR PRINCIPLES & CRITERIA JUNE 2017

Clause	Indica	tors	Comply Yes/No	Findings
4.5.3 Time-bound plan	(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	Wilmar is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details were provided in the Time Bound Plan described as per attachment 7.

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	(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 TBP, the later CB shall accept the appropriateness of the TBP at the moment of first involvement and shall only check continued appropriateness;	YES	Details of the Time Bound Plan described as per attachment 7.
be raised;	(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);	NO	Laba Utama, which is newly acquired by Wilmar International Limited under Jebawang Sdn Bhd not in the list of the time bound plan submitted. Refer to NCR MAR 01 2019.
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 1st January 2010 shall comply with the RSPO NPP. For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	NO	There was no evidence on the assessment of the 4.5.4 (a) to (d) to show that the requirements for uncertified management units and/or holdings as stated in clause of the RSPO Certification System Document (dated June 2017) have been met. Refer to NCR MAR 02 2019.
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6;		

,		-		
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3;		
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;		
	(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 4.5.4 (a) – (d) above by the audit team based on self-declarations only by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:		
		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;		
		Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.		
		<ul> <li>Desktop study e.g. web check on relevant complaints</li> </ul>		
		<ul> <li>If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non- compliance with the requirements.</li> </ul>		
4.6.4  The CB shall review whether oil palm operations have been established in areas which were		No additional indicators	YES	Wilmar owned the land as mentioned in 2.2.1 of this checklist. 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 people at Sri Kamusan CU.

# 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.

**RSPO PUBLIC SUMMARY REPORT** 

### Note:

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

### Attachment 4

## **Details of Non-conformities and Corrective Actions Taken**

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
2.1.1 DA 01 2019	Major	Requirements: Evidence of compliance with relevant legal requirements shall be available.  Findings: Non-compliance against Occupational Safety and Health (NADOPOD) Regulations 2004.  Objective evidence: According to Occupational Safety and Health (NADOPOD) Regulations 2004, refer to notification and reporting of accident and dangerous occurrence 5(2), it was sighted that the Hibumas 2 estate has delayed the reporting to Department of Occupational Safety and Health (DOSH) within 7 days regarding the accident that occurred on 05/05/2018.	1. Training on NADOPOD Regulations 2004 conducted for Safety & Health (S&H) Committee of Hibumas 2 & Jebawang Estates (combined) on 16/05/2019. Report of training is attached.  2. The secretary of the S&H is appointed as the responsible person for notifying DOSH through myKKP portal of any accident with more than four lost days. New appointment letter is attached.	Auditor has received copy of the training on NADOPOD Regulations 2004. The corrective action plan accepted.  Status: Closed
5.3.3 DA 02 2019	Minor	Requirements: A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.  Findings: Waste management and disposal plan was not effectively implemented and monitored.  Objective evidence: During site visit at landfill Jebawang, Hibumas 2, Sekar Imej and Sapi Sugut Estate, sighted plastic bottle, aluminium can, and lamp bulb were not segregate accordingly.	Training on Domestic Waste Segregation will be conducted to all Staff in-charge of landfills and their respective workers. Expected date of completion: 1st July 2019.      Wastes segregation records will be submitted to the ESHS Officer for monitoring quarterly.	Corrective action plan accepted. The effectiveness of the corrective action plan will verify during next audit.  Status: Open

4.5.3 (c)-Time Bound Plan MAR 01 2019  Major  Requirement:  Clause 4.5.3 (c) Time-bound plan: A the time-bound plan or to the circum company shall cause the time-bound reviewed by the CB. Changes to the plan are permitted only where the ordemonstrate to the CB that they are requirements will also apply to any rubsidiary from the moment that the legally registered with the local notal commerce (or equivalent);  Finding: The requirements as state apply to any newly acquired subsidiary moment that the company is legally	
in compliance in the time bound plan Objective evidence: Laba Utama, w acquired by Wilmar International Lin Jebawang Sdn Bhd not in the list of plan submitted.	and plan to be the time-bound organization can be justified. The shewly acquired be company is shary or chamber of shed above which is shary from the share organization can be justified. The shewly acquired be company is shary or chamber of share organization can be justified. The share of share organization can be justified above which is share organization can be justified. The share organization can be justified above which is share organization can be justi
4.5.4 (e and f)- Major Requirement:  Requirement for	The self assessment for Malaysia, Auditor has received the internal audit for

uncertified	Clause 4.5.4 (e) and (f) Requirements for uncertified ma	anagement.	Indonesia and Africa.
management	management units:		Sighted the series of Internal Audit on their
unit			uncertified unit as conducted and reported
MAR 02 2019	e) The audit team shall assess compliance with these		accordingly. The audit was conducted
	rules at each assessment of any of the applicable		against RSPO P&C and RSPO Partial
	management units. Assessment of compliance with		Certification Requirements. Evidence of
	requirements 4.5.4 (a) – (d) above by the audit team		audit attendance list, audit checklist & report
	based on self- declarations only by the company, with		were made available to auditor as the
	no other supporting documentation, shall not be		supporting evidence. It has been verified
	acceptable. Verification of compliance shall be based		that the internal assessment has covered all
	on the following approach:		requirements as specified in 4.5.4 (a)-(d)
			with this, it can be concluded that the
	f) A positive assurance statement is made, based		positive assurance made was justified.
	upon self-assessment (i.e. internal audit) by		
	organization. This would require evidence of the self-		Status: Closed
	assessment against each requirement.		
	Finding:		
	The requirement for Clause 4.5.4 (e) and (f) has not		
	been met.		
	Objective evidence :		
	There was no evidence of assessment of the 4.5.4 (a),4.5.4 (b), 4.5.4 (c) and 4.5.4 (d) to show that the requirements for uncertified management units		
	and/or holdings as stated in clause of the RSPO Certification System Document (dated June 2017) have been met.		

**Attachment 5** 

# **RSPO SUPPLY CHAIN: AUDIT CHECKLIST**

### RSPO SUPPLY CHAIN: AUDIT CHECKLIST (INCLUDING MULTISITE /GROUP CERTIFICATION OPERATIONS)

### **SECTION A: GENERAL INFORMATION**

1.	File Reference No.	:	EP09760004
2.	Name of facility/ site(s) /entity(ies)	:	Wilmar International Limited - Sri Kamusan Certification Unit
3.	Site Location (single site/multisite/Group)	:	KM 238 off Jalan Nangoh Pitas, Labuk Sugut
			Sandakan, Sabah
4.	SC model	:	MB model
5.	Type of entity	:	Mill / Crusher / Refinery / Biodiesel plant / Primary Oleochemical / Secondary Oleochemical / End product manufacturer
			For oleochemicals and its derivatives, please check the conversion factor against the "RSPO Rules for Oleochemicals and its Derivatives" dated 1st December 2016
6.	RSPO Member Number	:	2-0017-05-000-00 under Wilmar group.
7.	Annual summary records of certified oil palm products purchased and claimed	:	From 1 March 2018 to 28 February 2019, the company had received 118,913.43 MT of certified FFB.
			Within same interval, the company had delivered 14,000.13 MT of CPO under MB model and 4,714.90 MT of PK under MB model.

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

	Requirements	Remarks
	Audit Process Requirements – FOR STAGE 2 / RECERTIFICATION AUDI	Т
5.3.8	The certification audit shall review whether the organizational systems, the management systems and the operational systems, including any documented policies and procedures of the organization seeking or holding certification, are sufficient and adequately implemented to meet the intent and requirements of the RSPO Supply Chain Certification Standard.  Audit Process Requirements – SURVEILLANCE AUDIT	Not Applicable – Surveillance Audit
	Addit Flocess Requirements - SURVEILLANCE ADDIT	
5.3.26	The surveillance audit shall review whether the organizational systems, the management systems and the operational systems, including any documented policies and procedures of the organization holding certification, are sufficient and adequately implemented to meet the intent and requirements of the RSPO Supply Chain Certification Standard.  In cases where an organization seeking certification outsources activities to independent third parties, a risk assessment shall be done by the CB to determine whether an audit of the sub-contractor is required. If the outsourced contractor holds RSPO Supply Chain certification, then it does not require an additional audit.	<ul> <li>✓ Company's policy was made available during audit.</li> <li>✓ SKPOM-RSPO-SCC dated 1/1/2019 was sighted.</li> <li>✓ The company involved with outsources activities which include         <ul> <li>Transportation to buyer</li> <li>The agreement between the company and service provider was sight during the audit</li> <li>The auditor considered as low risk. Therefore, audit at outsource provider is not required.</li> </ul> </li> </ul>

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

	Requirements	Remarks
1	Applicability of the general chain of custody requirements for the supply	chain
1.1	Organization takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors.  Additional Guidance:  For client with SG or IP in the scope, check the weighbridge system, packaging, receiving, loading and storage facility area.	PPB Oil Palms Bhd - Sri Kamusan Certification Unit [hereafter refer as SRI KAMUSAN] takes legal ownership and physically handled RSPO certified palm products.  SRI KAMUSAN is a palm oil mill which physically handled the material (FFB) and products

		(CPO and PK).
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 as SRI KAMUSAN is a RSPO SC certified company.
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	Membership number: 2-0017-05-000-00 under Wilmar group.
1.4	Processing aids do not need to be included within an organization's scope of certification.	Not Applicable  Processing aid did not include within scope.
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.	Based on interviewed with the Office Clerk, it was found that the company is aware of regarding downgrading/declassification procedure.
	Additional Guidance: - For MB check the conversion factor used and the mass balance table.	As far as MB is concerned, the auditor observed that the company has established and maintaining the Mass Balance Stock Report.
2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	The company decided to retain currently use model (MB only).
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:	SRI KAMUSAN had prepared the RSPO procedure describing the procedures on the following activities related on its supply chain certification system as required in the RSPO Supply Chain Certification Systems. The Procedure was sighted and found all elements were covered.
a)	Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.	SRI KAMUSAN's procedure dated 1/1/2019 [SKPOM-RSPO-SCC] describing the procedures on the following activities related on its supply chain certification standard required by the RSPO.

b)	Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).	All relevant documents were sighted and it was found that the documented RSPOSC system has complied with the requirements of the RSPO SC standard, November 2014 (Revised 14/6/2017). As required in the procedure, all relevant record relating to the RSPOSC system will be maintained for a minimum of 2 years. Based on the samples of related records on receiving of RSPO certified FFB and sale of the RSPO certified CPO and PK, they were found to be adequate for tracing the origins of the RSPO certified material used in manufacturing of the products. The company will also be keeping proper record on the volumes of incoming RSPO certified FFB and the sales of the RSPO certified products, management review minutes, complaint and training.
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.	The Senior Mill Manager remained as RSPO Coordinator.
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.	Stated in Para 11 of supply chain procedure.  Latest internal audit was conducted in Nov 2018 with 1 NCR was issued.
	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.	Issuing non-conformities will be based on procedure which stated in Para 11.  Latest Management Review Meeting was held in Feb 2019 which chaired by the RSPO Coordinator.  Internal audit finding was discussed during the meeting.
4	Purchasing and goods in	
4.1	The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and following minimum information for RSPO certified products is made available by the supplier in document form:  • The name and address of the buyer;	The auditor has verified samples of all related incoming documents were per SRI KAMUSAN's procedure and RSPO SC standard requirement. It was found all related documents such as Delivery Ticket and Sales Contract were traceable.

	<ul> <li>The name and address of the seller;</li> <li>The loading or shipment / delivery date;</li> <li>The date on which the documents were issued;</li> <li>A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>The quantity of the products delivered;</li> <li>Any related transport documentation;</li> <li>Supply Chain certificate number of the seller;</li> <li>A unique identification number.</li> </ul>	
	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).	
a)	The site shall have documentation that demonstrate that purchases are made to the material category agreed with their supplier (IP, SG or MB).  Additional Guidance:  - Obtain list of all suppliers and list of purchase orders/invoices issued to the suppliers  - Check for agreement/contracts signed with suppliers  - Sampling of purchase orders/invoices shall be done on a random basis and the minimum number of samples selected shall be based on the square root formula for each suppliers.  - Ensure the purchase orders/invoices have the correct supplier's Supply Chain number.	List of supplier dated 1/12019 was sighted during the audit.  All certified FFB supplied by own supplier base under certificate number RSPO-PC 00107;
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.  Additional Guidance:  Request the PIC to demonstrate the use of the RSPO IT platform.	Not applicable.
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.	Not applicable.  All certified FFB supplied by own supplier base under certificate number RSPO-PC 00107;

	Additional Guidance: Request for list of suppliers Request the PIC to demonstrate where in the RSPO IT platform this can be found.	
4.2	The site shall have a mechanism in place for handling non-conforming material and/or documents.	SRI KAMUSAN has documented their mechanism for handling non-confirming material and handling non-conforming documents which stated in Appendix A of supply chain procedure.  No complaint regarding RSPO products had received since last audit.
5	Outsourcing activities	
5.1	In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard.  This requirement should not apply to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements	SRI KAMUSAN outsource activity only involved with transportation of certified product to buyer. An agreement between SRI KAMUSAN and the service provider was sighted and found acceptable.
	are controlled by the organization (not the tank farm manager).	
	Additional Guidance:  - Request for list of appointed subcontractors - Check on the availability of signed agreement or contract on the outsourced activity.	
5.2	Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:	Not applicable as no processing activities had been outsources by SRI KAMUSAN.
	<ul> <li>a) The site has legal ownership of all input material to be included in outsourced processes;</li> <li>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.</li> </ul>	
	<ul> <li>c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties</li> </ul>	

5.3	engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.  Additional Guidance: - Check the signed agreement has included a provision as required in para (d) of this requirement.  The site shall record the names and contact details of all contractors used for the processing or production of RSPO certified materials.	List of transporter dated in March 2018 was sighted and found acceptable.
5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or production of RSPO certified materials.	Not applicable as no new contractor was used since last audit.
6	Sales and goods out	
6.1	The organization shall ensure that the following minimum information for RSPO certified products is made available in document form. Information must be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):	From 1 March 2018 to 28 February 2019, SRI KAMUSAN had delivered  1. 14,000.13 MT of CPO under MB model 2. 4,714.90 MT of PK under MB model.
	<ul> <li>The name and address of the buyer;</li> <li>The name and address of the seller;</li> <li>The loading or delivery date;</li> <li>The date on which the documents were issued;</li> <li>A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>The quantity of the products delivered;</li> <li>Any related transport documentation;</li> <li>Supply chain certificate number;</li> <li>A unique identification number.</li> </ul>	SRI KAMUSAN only sold RSPO certified products (CPO and PK) to 1 buyer namely Sandakan Edible Oils Sdn Bhd. Sample of RSPO sales document were sighted during the audit and it was found all related information were adequate including the claim of products and supply certificate number (RSPO-PC 00107).
	<ul> <li>Additional Guidance:         <ul> <li>Sampling of shipping documents shall be done on a random basis and the minimum number of samples selected shall be based on the square root formula for each customer</li> <li>Conduct traceability verification during the audit.</li> </ul> </li> <li>Ensure the sales contract/ sales invoices/ delivery order/ delivery note etc. have the correct seller's Supply Chain certification number.</li> </ul>	

7	Registration of transactions	
7.1	Supply chain actors who:      are supply chain actors between the mill and final refinery;     take legal ownership and physically handle RSPO Certified Sustainable oil palm products; and     are part of the supply chain of RSPO Certified Sustainable oil palm products  must register their transaction in the RSPO IT platform at the time of physical	All announcement was done by Sustainability & Supply Chain Department which based in Kuala Lumpur. Based on interviewed with the Supply Chain Executive, he had demonstrated her acceptable knowledge regarding RSPO website.
8	shipment as required by the rules set by RSPO.  Training	
8.1	The organization shall have a defined training plan, which is subject to ongoing review and is supported by records of the training provided to staff.  Additional Guidance:  - Availability of an approved annual training plan; and  - Training record (training attendance list)	Training plan for year 2018 was sighted during the audit
8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification system.	SRI KAMUSAN has conducted RSPO training for its key personnel to familiarize them on the RSPO standard. The latest training was conducted on 8/11/2018 by Sustainability & Supply chain Team from KL which was attended by the company's staff whose works were related to the company's RSPO supply chain system. An attendance list on the training was sighted during the audit.
	Training shall be specific and relevant to the task(s) performed.  Additional Guidance: Request the list of personnel involved in managing the RSPO SC system in the company Check the training identified for the personnel and interview to verify the effectiveness of the training Request for the training materials and check on the training effectiveness.	Based on random interviews held with the relevant members of staffs being found that they had acquired the necessary knowledge and experience in implementing the system and good understanding on the requirements of RSPO SC standard, Nov 2014.
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.	Stated in Para 8 of Supply Chain Procedure.
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	Retention period of all records is defined in Document Retention Table. Tested RSPO transaction record – found that the oldest record i.e. 2015 was still available in the company's

	the certified status of raw materials or products held in stock.	folder.
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.	Summary of RSPO certified FFB received and dispatched of certified CPO and PK since last audit was sighted and adequate.
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).  Additional Guidance:  - For secondary oleoderivatives – the quantity based on molecular weight relative (refer to table 4 of the RSPO Rules for Oleochemicals and its Derivatives) to the primary oleochemical feedstock	SRI KAMUSAN is using conversion factors based own conversion rate of OER & KER.
10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.  Additional Guidance:  Request client to demonstrate the conversion factor used and check the mass balance table.	Referring to actual 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.	Not Applicable – no RSPO logo used by SRI KAMUSAN
	RSPO RULES ON COMMUNCIATIONS AND CLAIMS –  General corporate communications	L

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.	Not Applicable – no RSPO logo used by SRI KAMUSAN
4.2	In corporate communications a member is allowed to:	Not Applicable – no RSPO logo used by SRI KAMUSAN
	a. display its RSPO membership status	
	b. display the RSPO web address ( <u>www.rspo.org</u> )	
	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.	
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.rspo.org' where the link must lead to the member's profile page.	Not Applicable – no RSPO logo used by SRI KAMUSAN
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.	Not Applicable – no RSPO logo used by SRI KAMUSAN
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.	Not Applicable – no RSPO logo used by SRI KAMUSAN
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 – no RSPO logo used by SRI KAMUSAN
	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.	Not Applicable – no RSPO logo used by SRI KAMUSAN

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.	Not Applicable – no RSPO logo used by SRI KAMUSAN
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: A. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. B. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	Not Applicable – no RSPO logo used by SRI KAMUSAN
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 – no RSPO logo used by SRI KAMUSAN
	Business to consumer communication	
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	Not Applicable – no RSPO logo used by SRI KAMUSAN
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 – no RSPO logo used by SRI KAMUSAN
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 – no RSPO logo used by SRI KAMUSAN

6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Not Applicable – no RSPO logo used by SRI KAMUSAN
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	Not Applicable – no RSPO logo used by SRI KAMUSAN
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	Not Applicable – no RSPO logo used by SRI KAMUSAN
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	Not Applicable – no RSPO logo used by SRI KAMUSAN
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members.	Not Applicable – no RSPO logo used by SRI KAMUSAN
12	Complaints	
12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.  Additional guidance	Stated in Para 13 of Supply Chain Procedure  It was found that the company has yet to receive a complaint from any buyer and stakeholder related to company's chain of custody. It was found that the company did have a good procedure on the handling of complaint.
	- Procedure shall cover complaints from customers and stakeholders.	

13 Management review		
13.1	The organization is required to hold management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	Latest Management Review Meeting was held in Feb 2019 which chaired by the RSPO Coordinator.
13.2	The input to management review shall include information on:  Results of internal audits covering RSPO SCCS  Customer feedback  Status of preventive and corrective actions  Follow-up actions from management reviews  Changes that could affect the management system  Recommendations for improvement	The coverage of the review meeting was observed to be adequate in meeting the requirement of RSPOSC standard. The meeting focused on the adequacy of the company's documented system, the findings of the internal audit, the corrective actions implemented to address the non-conformities raised, resources required for the implementation of the system as well as on the preparation for the external audit.
13.3	The output from the management review shall include any decisions and actions related to:  • Improvement of the effectiveness of the management system and its processes  • Resource needs	

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

Module A – Identity Preserved (IP) – Not applicable to SRI KAMUSAN
Module B - Segregated (SG) - Not applicable to SRI KAMUSAN
Module C – Mass Balance (MB) - Not applicable to SRI KAMUSAN

Module	Module D – CPO Mills: Identity Preserved - Not applicable to SRI KAMUSAN		
Module	Module E - CPO Mills: Mass Balance		
E.3	Documented procedures		
E.3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:  a) Complete and up to date procedures covering the implementation of all the elements in these requirements;	SRI KAMUSAN's procedure dated 1/1/2019 [SKPOM-RSPO-SCC] describing the procedures on the following activities related on its supply chain certification standard required by the RSPO. The Procedure was sighted and found all elements were covered which included  V Receiving FFB Logistic of raw material (FFB) and finished products (CPO and PK) Storage (raw material and finished product) Production process from raw material(s) to finished product(s) Sales of finished product, including the identification of SCC model used Method to check the RSPO certification validity of the suppliers Control of non-conforming products/document Retention period of keeping the SCC related records such as contract document, purchasing records, delivery records, etc.	
	b) The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.	The Senior Mill Manager remained as RSPO Coordinator.	
E.3.2	The site shall have documented procedures for receiving and processing certified and non-certified FFBs.	Receiving - Para 3 (Purchasing and goods in)  Processing – Process flow chart revision 3, dated 23/5/2017.	
E.4	Purchasing and goods		
E.4.1	The site shall verify and document the volumes of certified and non-certified FFBs received.	From 1 March 2018 to 28 February 2019, the company had received  1. 118,913.43 MT of certified FFB from supply base. 2. 196,094.01 of non-certified FFB from outsider supply.	
E.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	Not applicable as no overproduction since last audit.	
E.5	Record keeping		

E.5.1	a) The site shall record and balance all receipts of RSPO certified FFB and	Refer to attachment
	deliveries of RSPO certified CPO and PK on a real-time basis and/or three-	
	monthly basis.	
	h) All valumes of palm oil and palm karnal oil that are delivered are deducted	
	b) All volumes of palm oil and palm kernel oil that are delivered are deducted	
	from the material accounting system according to conversion ratios stated by	
	RSPO.	
	c) The site can only deliver Mass Balance sales from a positive stock. Positive	
	stock can include product ordered for delivery within three months. However,	
	a site is allowed to sell short (i.e. product can be sold before it is in stock.)	
	a site is allowed to sell short (i.e. product can be sold before it is in stock.)	
	For further detail refer to Module C.	

Module F – Multi-site certification – Not applicable to SRI KAMUSAN					
Module G – Supply Chain Group Certification Scheme - Not applicable to SRI KAMUSAN					
Annex	1 – Supply Chain Yield Schemes - Not applicable to SRI KAMUSAN				
A.1.1	Palm Oil Yield Scheme - Not applicable to SRI KAMUSAN				
A.1.2	Palm Kernel Oil Yield Scheme - Not applicable to SRI KAMUSAN				
Annex 2 – Book and Claim (BC) - Not applicable to SRI KAMUSAN					
Annex	3 – RSPO Rules on Communications and Claims - Not applicable to SRI KAMUSAN				

### **Attachment 6**

## VERIFICATION OF NON-CONFORMITIES DURING LAST SURVEILLANCE ASSESMENT AT SRI KAMUSAN CU

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Status & Verification by Assessor
4.7.2 NCR STK 01 2018	Major	Findings: a) Accidents that took place were not investigated and HIRARC reviewed. b) A vehicle used for FFB crop evacuation was not risk assessed.  Objective evidence: a) On Sri Kamusan Estate accidents have taken place in November 2017, in January & February 2018 but the HIRARC was not reviewed. It was last reviewed on 18.03.2017 for 'Pembantu Rumah / Amah'. Before this it was reviewed only on 20.12.2016. b) On Sri Kamusan Estate the operation for using the vehicle "Mechanical Buffalo" for FFB crop evacuation was not risk assessed and included in the HIRARC document.	a) The Three mentioned accidents were investigated and their HIRARC already reviewed and revised accordingly. Investigation Report and HIRARC attached. b) The HIRARC for 'Mechanical Buffalo' for FFB Evacuation was developed on 23rd May 2018. The HIRARC is Attached	a) Sighted the evidence that investigation has been done and HIRARC has been reviewed b) Sighted evidence that HIRARC has been review on 23/5/18  Sighted Sri Kamusan CU have reviewed and updated in the HIRARC for all accident occurred which prevents the person from following his/her normal occupation for more than four calendar days. Meanwhile, the harvesting operation using "Mechanical Buffola" for FFB crop evacuation already been risk assessed and included in the HIRARC named of "Operasi Pemindahan Buah Tandan Segar (FFB) dengan menggunakan Mekanisasi Jentera Ladang (Errepi Buffalo)" reviewed date on 19/03/2018. Therefore, previous major NCR STK 01 2018 satisfactory closed.
4.7.3 NCR RR 01 2018	Major	Findings: Recommendation made by CHRA dated 2015 was not implemented.  Objective evidence:	- Emergency Shower were constructed at Sri Kamusan Estate (Workshop, Water Treatment Plant and Fertilizer store) and Hibumas 1 (Water Treatment Plant) at 21 May 2018	- Sighted photo evidence of Emergency Shower has been construct.

		Sri Kamusan Estate -Emergency shower was not available at workshop, water treatment plant, and fertilizer store.  Hibumas 1 Estate -Emergency shower was not available at water treatment plant at Block Parcel 13.		During site inspection at Sri Kamusan CU estates for water treatment plant, workshop, chemical store, and fertilizer store, sighted emergency shower and emergency eye wash was available at all area. Thus, previous minor NCR RAR 01 2018 issued was addressed and effectively closed.  Status: Closed
4.7.7 NCR STK 02 2018	Minor	Finding: Accident statistics were not well maintained and properly recorded.  Objective evidence: On Sri Kamusan Estate accidents have taken place in November 2017, in January & February 2018 but accidents statistics were not well maintained and properly recorded	- Training will be conducted to all Estate Clinic Dresser in Sugut Region on the correct way of reporting and recording of any occupational accidents, near misses and dangerous occurences in the estate and mill. The training expected to be conducted on 15 <sup>th</sup> April 2018	Observed all estates and mill have well maintained and recorded their accidents statistics using Lost Time Accident (LTA) metrics. Sighted on Feb 2019, Hibumas Estate recorded 1 accident with 2 lost mandays and for the others 3 estates (Jebawang, Sekar Imej & Sapi Sugut Estate) recorded no accident occurred. Thus, previous minor NCR STK 02 2018 was satisfactory closed.

### **Attachment 7**

## Time Bound Plan for Wilmar International Limited (Malaysia)

No.	Company	Estate	Mill	Location	Certification year	Status
1	PPB Oil Palms Berhad	Sapi 1, Sapi 2, Kiabau	Sapi Palm Oil Mill	Sandakan	2008	Certified
2	PPB Oil Palms Berhad	Reka Halus	Reka Halus Palm Oil Mill	Sandakan	2008	Certified
3	PPB Oil Palms Berhad	Sabahmas	Sabahmas Palm Oil Mill	Lahad Datu	2008	Certified
4	PPB Oil Palms Berhad	Saremas 1, Suai	Saremas 1 Palm Oil Mill	Bintulu	2010	Certified
5	PPB Oil Palms Berhad	Saremas 2, Kaminsky, Segarmas	Saremas 2 Palm Oil Mill	Bintulu	2010	Certified
6	PPB Oil Palms Berhad	Ribubonus	Ribubonus Palm Oil Mill	Sandakan	2010	Certified
7	PPB Oil Palms Berhad	Terusan 1, Terusan 2, Rumidi	Terusan Palm Oil Mill	Sandakan	2010	Certified
8	PPB Oil Palms Berhad	Hibumas 1, Hibumas 2, Jebawang, Sekar Imej, Sapi Sugut, Sri Kamusan	Sri Kamusan Palm Oil Mill	Sandakan	2011	Certified
9	PPB Oil Palms Berhad	Suburmas	Suburmas Palm Oil Mill	Bintulu	2021	To be certified
10	PPB Oil Palms Berhad	Labau Utama Sdn Bhd -Jebawang Sdn Bhd	Sri Kamusan Palm Oil Mill	Sandakan	2022	To be certified

### <u>Time Bound Plan for Wilmar International Limited (Indonesia-Kalimantan)</u>

No	. Company	Mill	Estate	Location	Certification year	Status
1	PT Mustika Sembuluh	PT Mustika Sembuluh mill 1	Mustika Sembuluh 1, Mustika Sembuluh 2, Kerry Sawit Indonesia 1, Sarana Titian Permata 1, Sarana Titian Permata 2, , KUD Bita Maju Bersama	Central Kalimantan	2010 (KUD bersertifikat di tahun 2014)	Certified

2	PT Kerry Sawit Indonesia	PT Kerry Sawit Indonesia I mill	Kerry Sawit Indonesia 2, Kerry Sawit Indonesia 3, KUD Sejahtera Bersama, KUD Kosudra,	Central Kalimantan	2011	Certified
3	PT Bumi Sawit Kencana	PT Bumi Sawit Kencana mill	Bumi Sawit Kencana 1, Bumi Sawit Kencana 2, Karunia Kencana Permaisejati 1	Central Kalimantan	2013	Certified
4	PT Sarana Titian Permata	PT Sarana Titian Permata 2 mill	Sarana Titian Permata 2, Sarana Titian Permata 3	Central Kalimantan	2020	Main Assessment
6	PT Agro Nusa Investama 1 (Sambas)	PT Agro Nusa Investama 1 (Sambas) mill	ANI Sambas			Certified
5	PT Mustika Sembuluh	PT Mustika Sembuluh 2 mill	Mustika Sembuluh 1, Mustika Sembuluh 3, Bumi Sawit Kencana 1	Central Kalimantan	2015	Certified
6	PT Mentaya Sawit Mas	PT Mentaya Sawit Mas mill	Mentaya Sawit Mas 1, Mentaya Sawit Mas 2, Bumi Sawit Kencana 2	Central Kalimantan	2015	Certified
7	PT Kerry Sawit Indonesia	PT Kerry Sawit Indonesia 2 mill	Kerry Sawit Indonesia 1, Kerry Sawit Indonesia 2, Mustika Sembuluh 2, KUD Tabiku Makmur, KUD Karya Bersama	Central Kalimantan	2015	Certified
8	PT Rimba Harapan Sakti	PT Rimba Harapan Sakti mill	PT. Rimba Harapan Sakti 1, PT. Rimba Harapan Sakti 2, PT. Kerry Sawit Indonesia 3	Central Kalimantan	2015	Certified
9	PT Karunia Kencana Permaisejati	PT Karunia Kencana Permaisejati mill	PT. Karunia Kencana Permaisejati 1, PT. Karunia Kencana Permaisejati 2, PT. Karunia Kencana Permaisejati 3	Central Kalimantan	2017	Certified

10	KUD Karya Bersama, KUD Sejahtera Bersama, KUD Tabiku Makmur, KUD Kosudra	PT Kerry Sawit Indonesia 1,2 mill	KUD Karya Bersama, KUD Sejahtera Bersama, KUD Tabiku Makmur, KUD Kosudra	Central Kalimantan	2020	Re-Audit
11	PT Bumipratama Khatulistiwa	PT Bumipratama Khatulistiwa mill	Bumi Pratama Khatulistiwa, Buluh Cawang Plantation	West Kalimantan	2016	Certified
12	PT Agro Nusa Investama (Landak)	PT Agro Nusa Investama (Landak) Mill	Agronusa Invenstama 2 (Landak), Pratama Procentindo	West Kalimantan	2020	To be certified
13	PT Agro Palindo Sakti 2	PT Agro Palindo Sakti 2 mill	Agro Palindo Sakti, Putra Indotropical, Daya Landak Plantation, Indoresin Putra Mandiri	West Kalimantan	2020	To be certified
14	KUD Cempaka Biru, KUD Sentama Lestari (Plasma binaan ANI 1 Sambas)	PT Agro Nusa Investama 1 (Sambas)	KUD Cempaka Biru, KUD Sentama Lestari (Plasma binaan ANI 1 Sambas)	estari (Plasma binaan West Kalimantan		Re-Audit

## <u>Time Bound Plan for Wilmar International Limited (Indonesia-Sumatera)</u>

No.	Palm Oil Mill/Estate	Mill	Estate	Location	Certification year	Status
1	PT Perkebunan Milano	PT Perkebunan Milano Mill	Sei Daun, Batang Saponggol, Merbau	North Sumatra	2009	Certified
2	PT Tania Selatan	PT Tania Selatan Mill	Burnai Timur, Burnai Barat	South Sumatra	2010	Certified
3	PT Kencana Sawit Indonesia	PT Kencana Sawit Indonesia Mill	Kencana Sawit Indonesia,	West Sumatra.	2010	Certified
4	PT AMP Plantation	PT AMP Plantation Mill	AMP I, AMP II, AMP III, AMP IV, Primatama Mulia Jaya, Karya Agung Megah Utama, Perkebunan Anak Negeri Pasaman, Koperasi Tompek Tapian Kandis, Koperasi AWM, Koperasi BST, Koperasi MSJ	West Sumatra	2011 (KUD bersertifikat di tahun 2014)	Certified

5	PT Buluh Cawang Plantations	PT Buluh Cawang Plantations Mill	Bumi Arjo, Dabuk Rejo, Sukamulya, Bambu Kuning	South Sumatra	2012	Certified
6	PT Gersindo Minang Plantations	PT Gersindo Minang Plantations Mill	Gersindo Minang Plantation, Permata Hijau Plantation-1, Permata Hijau Plantation-2	West Sumatra	2012	Certified
7	PT Daya Labuhan Indah	PT Daya Labuhan Indah Mill	Wonosari, Sei Deras, Cabang Dua	North Sumatra	2013	Certified
8	PT Agro Palindo Sakti	PT Agro Palindo Sakti Mill	Agro Palindo Sakti	South Sumatra	2014	Certified
9	PT Murini Sam Sam	PT Murini Sam Sam Mill	Murini Sam Sam	Riau	2015	Certified
10	PT Musi Banyuasin Indah	PT Musi Banyuasin Indah Mill	Sei Selabu, Sei Jarum, KUD Karya Gatra, KUD Karya Makmur Sriwijaya, KUD Panca Karya Jaya, KUD Sumber Makmur, KUD Tri Tunggal Karya	South Sumatra	2020	To be certified
11	PT Sinarsiak Dianpermai	PT Sinarsiak Dianpermai Mill	Sinarsiak DianPermai	Riau	2020	Pre assessment audit
12	Agrindo Indah Persada 2	Agrindo Indah Persada 2 Mill		Jambi	2023	Sudah menjalani NPP audit di tahun 2010
13	KUD Dastra II (Plasma binaan AMP)	PT AMP Plantation Mill		West Sumatera	2019	To be certified
14	KUD Dastra I (Plasma binaan PMJ)	PT AMP Plantation Mill		West Sumatera	2019	To be certified
15	KUD Sasak, KUD Kapar, Mutiara Bosa Sikilang, Permata Sawit Maligi (Plasma binaan PHP)	PT Gersindo Minang Plantation Mill		West Sumatera	2019	To be certified
16	PHP (blok 22)	PT Gersindo Minang Plantation Mill		West Sumatera	2020	To be certified

# **Time Bound Plan for Wilmar International Limited (Africa)**

No.	Company	Estate	Mill	Location	Certification year	Status
1	Benso Oil Palm Plantation (BOPP)	BOPP Adum Banso Estate and associated Scheme Smallholders	BOPP Mill 1	Western Region, Ghana	2014	Certified
2	Biase Plantations Limited	Calaro Estate	Under Construction	Cross River State, Nigeria	2020	to be certified (mill construction in progress)
3	Biase Plantations Limited	Calaro Extension Estate	None planned	Cross River State, Nigeria	2022	to be certified (NPP completed recently in 2016. Land preparation no starting)
4	Biase Plantations Limited	Ibiae Estate	Construction not started	Cross River State, Nigeria	2020	to be certified (NPP completed. Mill construction yet to start)
5	Eyop Industries	Ibad Estate	Construction not started	Cross River State, Nigeria	2021	to be certified (mill construction yet to start), pending clarification for NPP assessment
6	Eyop Industries	Kwa Falls	None planned	Cross River State, Nigeria	2020	to be certified (replanting of existing plantations in progress)
7	Eyop Industries	Oban	None planned	Cross River State, Nigeria	2021	to be certified (NPP not started), Pending clearance from government for NPP assessment