

SIRIM QAS INTERNATIONAL SDN. BHD.

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

File Ref.: EP09760002

RSPO PUBLIC SUMMARY REPORT

CLIENT: TERUSAN CERTIFICATION UNIT PARENT COMPANY: WILMAR INTERNATIONAL LIMITED

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

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

Certification	Mill and Supply	GPS	Location	Location	
Unit	Base	Latitude Longitude		Location	
	Terusan Palm Oil Mill	5°49' 54.687"N	117° 20' 30.315"E	Batu 65, Jalan Telupid Labuk/Sugut, Sandakan, Sabah.	
Terusan	Terusan 1 Estate	5°47' 23.104"N	117° 23' 37.202"E	Batu 65, Jalan Telupid Labuk/Sugut, Sandakan, Sabah.	
Certification Unit	Terusan 2 Estate	5°49' 57.944"N	117° 20' 22.743"E	Batu 65, Jalan Telupid Labuk/Sugut, Sandakan, Sabah.	
	Rumidi Estate	5°55' 59.804"N	117° 18' 43.466"E	Batu 65, Jalan Telupid Labuk/Sugut, Sandakan, Sabah.	

				5°55′ 59.804″N	117°	18′ 43	3.466″E	Jalan Telu Sandakan	pid Labuk/Sugut, , Sabah.	
MAP	: See A	Attach	nment 1		•					
AUDI	IT DAT	E :	: 9-12 July 2019)		DUR	ATION	:	16 auditor days	
TYPE	OF A	JDIT	: Annua 04	al Surveillance Au	ıdit No.		Rec	ertificatio	n Audit	
STAN	NDARD		SPO PRINCIPLE & TANDARD 2014 (RE			ND R	SPO SUF	PPLY CHA	IN CERTIFICATION	
SCO	PE OF	CER [.]	TIFICATION: Produ Balan	ction of Sustainable ce Supply Chain N		Palm	Oil and P	alm Kerne	I Using the Mass	
			SPO CERTIFICATE		/2020					
			tachments form par eport(s)	t of this report:	List of a	dditio	nal site(s)]	
Repo	ort by A	udit	Team Leader	Ac	knowle	dgem	ent by CI	ient's Rep	<u>resentative</u>	
Name	Э	: _	ROZAIMEE BIN AB	RAHMAN Na	ame	: _	Foo Siev	v Theng		
Signa	ature	:	Art.	Si	gnature	: _	tank			
Date		:	14 Oct 2019	Da	ate	:	22 Oct 2	019		

SUMMARY OF AUDITS

OOMMIAKT OF AODI						
		Sta	age 2 audit /	Recertifica	ntion audit	
On-site audit date	:				No. of auditor days	
Audit team	:					
No. of major NCR	:	l:	ndicator:			Closing date :
No. of minor NCR	:	l:	ndicator :			
Indicate the stakeholders	:	Employees	S Set	tlers	Villagers / Local communities	Suppliers
interviewed during the						
on-site audit		Contract workers	NG	Os	Govt. agency	Independent growers
		Indigenous people	Col	ntractor	Others (Please specif	y)
Supply base sampled	:		•		_	
Report approved by	:				Approval date :	

	Annual Surveillance Audit 1								
On-site audit date	:	1-5 Augu	st 2016		No. of auditor days	15 Auditor Days			
Audit team	:	Mohd Zu Suppiah	lfakar Kan	naruzaman (LA), N	Nohd Norddin Abd Jalil	, Jagathesan A/I			
No. of major NCR	:	-	Indicator	:-		Closing date : -			
No. of minor NCR	:	3	Indicator	: 2.1.3, 4.5.2, and	4.7.6				
Indicate by ticking the stakeholders	:	Employe	es	Settlers	Villagers / Local communities	Employees			
interviewed during the		X	(X	X			
on-site audit		Contract	workers	NGOs	Govt. agency	Contract workers			
		Indigenous people		Contractor	Others (Please speci	l ffy)			
Supply base sampled	:	Terusan	2 Estate	and Rumidi Estate		•			
Changes since the last audit	:	Contact 15/1/16	Contact Person change from Mustapha Habe to Edward Jude effective date						

Annual Surveillance Audit 2									
On-site audit date	:	11 - 14 Ju	ıly 2017		No. of auditor days	16 Auditor Days			
Audit team	:	Mohd Zul Rahayu Z		naruzaman (LA), R	ozaimee Ab Rahman,	Mohd Ab Raouf Asis,			
No. of major NCR	:	2	Indicator	: 4.5.2 (Recurrence	e Issue), 5.3.2	Closing date : 13 October 2017			
No. of minor NCR	:	3	Indicator	: 2.1.3, 4.1.2, 6.2.	3				
Indicate by ticking the	:	Employee	es	Settlers	Villagers	Employees			
stakeholders		Х			X	X			
interviewed during the		Contract	workers	NGOs	Govt. agency	Contract workers			
on-site audit									
		Indigenou people	ıs	Contractor	Others (Please spec	ify)			
				X					
Supply base sampled	:	Terusan	1 Estate a	nd Rumidi Estate					
Changes since the last audit	:	Changed	of contac	t person from Mr. I	Edward Jude to Mr.Ho	on Tai Liang			

Annual Surveillance Audit 3									
On-site audit date	:	21-25 Ma	ay 2018		No. of auditor days	16 days			
Audit team	:	Rozaime	e, Mohd Z	Zulfakar, Mohd Ab	Raof, Rahayu, Zulkarn	ain			
No. of major NCR	:	2	2 Indicator:6.1.2, 4.3.4			Closing date	:		
						20 Aug 2018			
No. of minor NCR	:	6	Indicator	:1.3.1, 6.2.3, 6.5.3	3, 4.1.2, 4.3.5, 5.6.3				
Indicate by ticking the	:	Employe	es	Settlers	Villagers / Local	Suppliers			
stakeholders					communities				
interviewed during the		>	(X	X			

on-site audit	Contract workers	NGOs	Govt. agency	Independent growers
	Indigenous people	Contractor	Others (Please spec	ify)
	X	Х		
Supply base sampled :	Terusan POM, Ter	usan 1 Estate, Ter	rusan 2 Estate	
Changes since the last :	6.63ha was remov	ed from the hectar	age of Rumidi Estate f	or project under
audit	Jabatan Air Sabah			
Justification of audit :	Total allocation of	audit man day for ⁻	Terusan CU were:	
planning	(HCV are villagers, agriculture) Terusan 2 (HCV are villagers, agriculture) Terusan 1 best pra	eas, buffer zone a stakeholder, etc.) e best practices, G 2 Estate = 5.5 aud eas, buffer zone a stakeholder, etc.) e best practices, G POM = 5 auditor of	treas, boundary forest verified safety and her sHG verification, etc itor days, monitoring careas, boundary forest verified safety and her sHG verification, etc. days, for safety and h	on critical areas such as reserve, neighbouring alth, environment, good on critical areas such as reserve, neighbouring alth, environment, good ealth, environment, mill day for supply chain
Report approved by :	Radziah Mohd Dau	ud	Approval date: 3/	09/2018

	Annual Surveillance Audit 4						
0		0.40 1.4		Surveillance Aud		40 D-11-	
On-site audit date	-	9-12 July		, (() D (()	No. of auditor days	16 Days	
Audit team	_ :				Azmi, Rahayu, Selvasi		
No. of major NCR	:	1		::6.5.3 (recurrence	•	Closing date : 30/09/2019	
No. of minor NCR	:	6	Indicator	:4.4.1, 5.1.3, 4.1.2	2, 4.2.1, 4.3.6, 4.5.4(e)) – RSPO cert. system	
Indicate by ticking the stakeholders	:	Employe	es	Settlers	Villagers / Local communities	Suppliers	
interviewed during the		١			$\sqrt{}$		
on-site audit		Contract	workers	NGOs	Govt. agency	Independent growers	
				$\sqrt{}$	$\sqrt{}$		
		Indigeno people	us	Contractors	Others (Please speci	ify)	
		1		√			
Supply base sampled	:	Terusan	POM, Ter	usan 1 Estate, Ter	usan 2 Estate, Rumidi	Estate	
Changes since the last audit	:	No chang					
Justification of audit planning	:	 Terusan 1 Estate = 4 auditor days, monitoring on critical areas such as (HCV areas, buffer zone areas, boundary forest reserve, neighbouring villagers, stakeholder, etc.) verified safety and health, environment, good agriculture best practices, GHG verification, etc Terusan 2 Estate = 4 auditor days, monitoring on critical areas such as (HCV areas, buffer zone areas, boundary forest reserve, neighbouring villagers, stakeholder, etc.) verified safety and health, environment, good agriculture best practices, GHG verification, etc. Rumidi Estate = 4 auditor days, monitoring on critical areas such as (HCV areas, buffer zone areas, boundary forest reserve, neighbouring villagers, stakeholder, etc.) verified safety and health, environment, good agriculture best practices, GHG verification, etc. Terusan POM = 4 auditor days, for safety and health, environment, mill best practices, GHG verification, etc) + (1 day for supply chain certification systems) 					
Report approved by	:	Kamini S	ooriamoo	rthy	Approval date: 14	1/10/2019	

SUMMARY OF INFORMATION

TABLE 1

	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4		
Projection Period		August 2016 to July 2017	July 2017 to June 2018	May 2018 to Apr 2019	July 2019 – June 2020		
Certified FFB Processed (MT)		89,245.00	83,143.00	74,271.67	68,153.50		
Production of Certified CPO (MT)		18,741.45	18,116.38	16,339.77	14,993.77		
Production of Certified PK (MT)		4,462.25	3,718.30	3,193.68	2,930.60		
Certified Areas (Ha)		7,596.13	7,596.13	*7,589.57	7,589.57		
Planted Areas (Ha)		6,740.84	6,743.92	6,618.25	**6,653.98		
Production Areas (Ha)		-	-	3,074.2	2,664.01		
HCV Areas / Conservation Areas (Ha)		311.77	311.77	311.77	311.77		
REMARKS		For ASA 3: May 2018 to Apr 2019 *6.56ha was removed from the hectarage of Rumidi Estate for project under Jabatan Air Sabah.					
	For ASA 4 : July 201 **Increase on plante	<u>9 to June 2020</u> d area (35.73 ha) relat	ed to resurvey activiti	es at replanting areas	i.		

TABLE 2

	PO	PK
Last years certified volume (MT)	*22,420.01	*4,524.38
Last years actual certified sold (MT)	4,819.01	3,142.78
Last years actual sold under other schemes (MT)	9,545.55	0.00
Last years sold conventional (MT)	0.00	0.00
New year certified volume (MT)	14,993.77	2,930.60

^{*}Extension of volume for both CPO and PK has been requested and approved by RSPO on 29/05/2019.

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1.0 AUDIT PROCESS

1.1 Certification Body

SIRIM QAS International Sdn. Bhd. is the leading certification, inspection and testing body in Malaysia. SIRIM QAS International provides a comprehensive range of certification, inspection and testing services which are carried out in accordance with internationally and nationally recognised standards. Attestation of this fact is the accreditation of the various certification and testing services by leading national and international accreditation and recognition bodies such as the Department of Standards Malaysia (STANDARDS MALAYSIA), the United Kingdom Accreditation Services (UKAS) and the International Automotive Task Force (IATF). SIRIM QAS International is a partner of IQNet, a network currently comprising of leading certification bodies in Europe, North and South America, East Asia and Australia.

SIRIM QAS International has vast experience in conducting audits related to RSPO certification. It has certified more than a hundred palm oil mills and several estates to ISO 14001 & OHSAS 18001. SIRIM QAS International has also conducted many audits for sustainable production of palm oil products against the requirements of the RSPO P&C. SIRIM QAS International was approved by the RSPO as a RSPO certification body on 21 March 2008 and re-accredited by ASI on 3 October 2019 (accredited since 2014).

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Rozaimee Ab Rahman	Lead Auditor / Safety & Health and Environment / TBP/ Uncertified management unit	Holds a B. Sc. in Agriculture from University Putra Malaysia. He had more than 5 years of working experience in the oil palm operation.
Dzulfiqar Azmi Auditor / Environment & Safety		Holds a B. Plantation Management from UITM. He had more than 7 years of working experience in the oil palm operation.
Selvasingam T Kandiah	Auditor / Good Agricultural Practices (GAP)	Holds a B.Sc. (Hons) in Agriculture. He has worked as a planter with Kumpulan Guthrie Berhad for more than 10 years including one year in Liberia and 2 years in the Estate Department in Kumpulan Guthrie Headquarters.
Rahayu Zulkifli	Auditor / Social / HCV	Holds a Degree in LLB (Hon), she was a practicing lawyer before joining WWF-Malaysia and RSPO as a Dispute Settlement Facility Manager. She is now working as a freelance RSPO auditor.
Mohd Zulfakar Kamaruzaman	Auditor / RSPO Supply chain	Holds a B.Sc. Forestry from University Putra Malaysia. He had more than 5 years of working experience in the oil palm operation.

1.3 Audit methodology

The audit covered the one palm oil mill and all of its supply base, i.e. the Terusan 1 Estate, Terusan 2 Estate, and Rumidi Estate. The audit included an on-site audit to the estates and mill and 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

Stakeholders consultation was carried out during the on-site audit. Among the stakeholders interviewed included the representatives of the villages, workers, contractors and suppliers. In general, there was no negative comments received on the CU.

1.5 Audit plan : Refer to Attachment 2

Date of next audit: The next surveillance audit will be conducted within 12 months but not sooner than 9 months from this audit.

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Terusan Certification Unit (CU) is one of the certification unit under the PPB Oil Palms Berhad. The CU consisted of one palm oil mill and three estates, namely the Terusan Palm Oil Mill (hereafter referred to as TPOM), Terusan 1 Estate, Terusan 2 Estate and Rumidi Estate. TPOM commenced its operations in 1995 with a processing capacity of 60 metric tonnes of (FFB) per hour. The total combined land area of the three estates is 7,589.57 hectares (Ha) of which 6,653.98 Ha had been planted with oil palm. As Terusan 1, 2 and Rumidi Estate were fully developed before the year of 2005, Principle 7 of the RSPO P&C is therefore not applicable.

Located in Sandakan District, Sabah, Malaysia, the CU is accessible via the Sandakan – Telupid Road. The CU is about 160 km from the town of Sandakan. The mill and the 3 estates were equipped with living quarters for all its employees.

There were few villages and other oil palm plantations at the vicinity of the CU. Along the northern boundary, there are Kg. Rumidi, Kg. Tendu Batu and Kg. Nangoh. In the west are Kg. Perenchangan, Kg. Bakong-Bakong, Kg. Sualog, Kg. Panimbanan and Kg. Lidong. Kg. Toniting lies at the southern side while the Andamy Plantation is on the west separated by a public road from Terusan 1 and 2 Estate. Adjacent to the Rumidi Estate at the southern boundary is the Bidu-Bidu Forest Reserve.

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

The FFB is sourced from company owned certified estates and third party supplier. Details of the FFB contribution from each source to the Terusan Palm Oil Mill are shown in the following tables:

Table 1: Actual FFB production by the supply base for the last reporting period (July 2018 to June 2019)

	FFB I	Production	0 415 1 4 00	
Estates –	Tonnes Percentage (%)		Certifying CB	
Terusan 1	18,507.38	9.40%	SIRIM	
Terusan 2	12,922.76	6.56%	SIRIM	
Rumidi	21,726.46	11.04%	SIRIM	
Koperasi Land (Sapi Sugut)	3,006.86	1.53%	SIRIM	
Aktif Kukuh (Sapi Sugut)	1,335.54	0.68%	SIRIM	
Hibumas 2	1,378.12	0.70%	SIRIM	
Jebawang	298.50	0.15%	SIRIM	
Sekar Imej	6,184.56	3.14%	SIRIM	
Total	65,360.18			
Third parties				
WAGS	4,263.38	2.17%	Control Union	
Outsider	127,223.19	64.63%	-	
Total certified	69,623.56			
Grand Total	196,846.75			

Table 2: Projected FFB production by the supply base for the next reporting period July 2019 to June 2020

Estates	FFB Contribution		
Estates	Tonnes	Percentage (%)	
Terusan 1 Estate	14,569.00	8.93	
Terusan 2 Estate	53,584.50	32.84	
Rumidi estate	0.00	0.00	
Total	68,153.50	41.77	
Other Supply Bases (Non-Certified)			
Outsider	95,000.00	58.23	
Grand Total	163,153.50	100%	

Table 3: Actual FFB received and CPO & PK dispatch by Terusan POM for period from July 2018- June 2019

RSPO Supply Chain Model : Mass Balance	Total (MT)
FFB Received	196,846.75
FFB Processed	196,750.21
Certified FFB Processed	69,623.56
Non-certified FFB Processed	127,223.19
Crude Palm O	il (CPO)
Overall CPO Production	40,837.79
Certified CPO Production	14,467.49
Certified CPO delivered as RSPO	4,819.01
Certified CPO delivered as non-RSPO	0.00
Certified CPO delivered under other sustainable schemes	9,545.55
Credits traded thru Book & Claim	0.00
Palm Kerne	I (PK)
Overall PK Production	8,838.43
Certified PK Production	3,093.25
Certified PK delivered as RSPO As at 1 July 2018	49.53
Certified PK delivered as RSPO	3,093.25
Certified PK delivered as non-RSPO	0.00
Certified PK delivered under other sustainable schemes	0.00
Credits traded thru Book & Claim	0.00

Table 4: Projected FFB received and CPO & PK dispatch by Terusan POM of next reporting period <u>July 2019 – June 2020</u>

RSPO Supply Chain Model : Mass Balance	Total (MT)
FFB Received	163,153.50
FFB Processed	163,153.50
Certified FFB Processed	68,153.50
Non-certified FFB Processed	95,000.00
Crude Palm Oil	(CPO)
Overall CPO Production	35,893.77
Certified CPO Production	14,993.77
Certified CPO delivered as RSPO	14,993.77
Certified CPO delivered as non-RSPO	0.00
Certified CPO delivered under other sustainable schemes	0.00
Palm Kernel	(PK)
Overall PK Production	7,015.60
Certified PK Production	2,930.60
Certified PK delivered as RSPO	2,930.60
Certified PK delivered as non-RSPO	0.00
Certified PK delivered under other sustainable schemes	0.00

Table 5 Planted and certified area of the Terusan CU

Table of Halling and Colling a						
Estate	Planted (ha)	Certified (ha)				
Terusan 1 Estate	2,436.74	2,868.90				
Terusan 2 Estate	3,187.67	3,485.90				
Rumidi Estate	1,029.57	1,234.77				
Total	6,653.98	7,589.57				

Table 6: Planting profile for Terusan 1 Estate

Table 6.1 failting profile for Terusain 1 Estate					
Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)	
1992	1 st generation	Mature	306.41	12.57	
1993	1 st generation	Mature	243.84	10.01	
2015	2 nd Generation	Mature	123.99	5.09	
2016	2 nd Generation	Immature	425.36	17.46	
2017	2 nd Generation	Immature	427.52	17.54	
2018	2 nd Generation	Immature	699.48	28.71	
2019	2 nd Generation	Immature	210.14	8.62	
Total			2,436.74	100.00	

Table 7: Planting profile for Terusan 2 Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
2014	2 nd generation	Mature	469.29	14.72
2015	2 nd generation	Mature	633.68	19.88
2016	2 nd generation	Immature	621.43	19.49
2017	2 nd generation	Immature	684.89	21.49
2018	2 nd generation	Immature	778.38	24.42
Total			3,187.67	100

Table 8: Planting profile for Rumidi Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
1994	1 st generation	Mature	428.89	41.66
2000	1 st generation	Mature	50.92	4.95
2002	1 st generation	Mature	29.32	2.85
2013	2 nd generation	Mature	284.49	27.63
2014	2 nd generation	Mature	93.18	9.05
2019	2 nd generation	Immature	142.77	13.87
Total			1,029.57	100

2.3 Organizational Information/Contact Person(s)

The details of the contact person is as shown below:

Name	:	Frederick Chok Choon Loi
Position		Group Manager
Address	:	PPB Oil Palms Berhad Sabah Operation. Lot 1A, KM 15, Jalan Labuk, Locked Bag 34, 90009 Sandakan Sabah
Phone no.	:	089 671546/089 670208
Fax no.	:	089 670260
Email	:	frederick.chokchoonloi@my.wilmar-intl.com

3.0 AUDIT FINDINGS

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

There was no changes to the certified products since last assessment.

3.2	Progress and changes in time bound plan

i. Have all the estates under the parent company been certified?

	Yes	No

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

All of the estates and mills belonged to PPB had been certified to RSPO P&C. However, Wilmar is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details provided in the Time Bound Plan described in Attachment 7.

ii. Are there any changes to the organization's time bound plan?

Yes		No

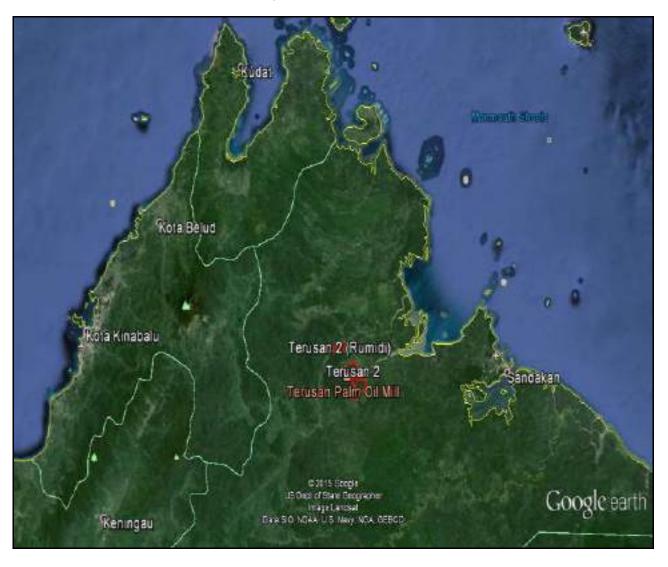
If yes, comment in terms of acceptance or non acceptance on the changes in the time-bound plan?

iii.	Are there associated smallholders (including sch	neme smallholders) in the Yes No							
	If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its Certification?								
	If no, please state reasons N/A as there is no associated smallholders supplying FFB to the CU.								
iv.	Any new acquisition which has replaced primary	forests or HCV areas Yes No							
3.3	Other changes (e.g. organizational structure, ne	w contact person, addresses, etc.)							
	There was no changes since last year.								
3.4	Status of previous non-conformities * * If not closed, minor non conformity will be upgra	Closed Not closed* ided to major non conformity							
3.5.	Complaint received from stakeholder (if any) There were various stakeholders interviewed during the conduct of this audit. These include workers, surrounding villagers, contractors and suppliers. In general, all the interviewed stakeholders had given positive feedback on the CU.								
4.0	DETAILS OF NON-CONFORMITY REPORT								
4.1	For P&C (Details checklist refer to Attachment	3):							
	Total no. of minor NCR(s) (details refer to Attachment 4) List :6	DA 01 2019, DA 02 2019, STK 01 2019, STK 02 2019, STK 03 2019, RAR 01 2019 (RSPO Certification System)							
	Total no. of major NCR(s) (details refer to Attachment 4) List :1	RZ 01 2019							
4.2	For SC (Details checklist refer to Attachment 5):								
	Total no. of minor NCR(s) List: 0 NA (details refer to Attachment 5)								
	Total no. of major NCR(s) (details refer to Attachment 5)								
5.0		tion has established and maintained its management nts of the standard and demonstrated the ability of the on & requirements.							

No NCR recorded. Recommended to continue certification.	No NCR recorded. Recommended to continue certification.							
Minor NCR(s) recorded. Corrective action plan has been accepted. Verification of the to be carried out in the next audit.	NCR(s)							
Note: Minor NCRs raised in the audit which are not addressed in the subsequent audie be upgraded to major NCRs.	dit shall							
	Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided and accepted by the audit team. The NCR(s) have been satisfactorily closed out.							
Recommended to continue certification.	Recommended to continue certification.							
provided but not fully accepted by the audit team. NCR(s) have not been satis	Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s) have not been satisfactorily closed out within 60 days of the audit. Recommended for suspension of the certificate.							
Note: Major NCRs which are not addressed within a further 60 days shall resul certificate being withdrawn.	in the							
IT IS CONFIRMED THAT ALL CORRECTIVE ACTIONS TAKEN ON MAJOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED, ACCEPTED AND VERIFIED AND ALL CORRECTIVE ACTIONS PLANS PROVIDED ON MINOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED AND ACCEPTED. RECOMMENDED FOR CONTINUATION OF RSPO P & C CERTIFICATION.								
Audit Team Leader: ROZAIMEE BIN AB RAHMAN 30/09	/2019							
(Name) (Signature) (Da	ate)							

Attachment 1

Location map of Terusan Certification Unit



Location map of Terusan Certification Unit



SIRIM QAS INTERNATIONAL SDN. BHD.

RSPO SURVEILLANCE 4 AUDIT PLAN

1. Objectives

The objectives of the assessment are as follows:

- (i) To evaluate Terusan Certification Unit continued conformance against the RSPO Principles & Criteria Malaysian National Interpretation (MYNI) and RSPO Supply Chain Requirements
- (ii) To verify the effective implementation of corrective actions arising from the findings of last assessment.
- (iii) To make appropriate recommendations based on the assessment findings.

2. Date of assessment : 9-12 July 2019

3. Site of assessment : Terusan CU

Terusan Palm Oil Mill
Terusan 1 Estate
Terusan 2 Estate
Rumidi Estate

4. Scope of Certification: Production of crude palm oil and palm kernel using Mass Balance model

5. Reference Standard:

- a. RSPO P&C MYNI: 2014
- b. RSPO Certification Systems 2017
- c. RSPO Supply Chain Standard, 2017
- d. Company's audit criteria including Company's Manual/Procedures

6. Assessment Team

Assessor: Rozaimee Ab Rahman (TBP, GHG) - RAR

Rahayu Zulkifli (social, HCV) -RZ

Dzulfigar Azmi (Gap & Safety) - DA

Mohd Zulfakar Kamaruzaman Zulfakar (SCCS) - MZK

Selvasingam T. Kandiah (GAP, Safety) - STK

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.

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. Conflict of interest

Auditors have not been employed by the organization concerned nor provided consultancy services relating to the development of its system in the past five years and next five years.

11. Working Language: English and Bahasa Malaysia

12. Reporting

a) Language : English

b) Format : Verbal and written

c) 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

13. 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

14. Assessment Programme Details : As shown below

Date / Time	Coverage of assessment / Activity / Site	RAR	RZ	STK	DA	MZK
Day 1: 09/07	/2019 (Tuesday)					
8.30am – 9.15am	Opening Meeting – Venue: Terusan POM Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes Organization Representative - Briefing RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases, Time bound plan, actions taken to address previous audit findings.					
9.15am – 12.30pm	Site observation to Terusan POM P1, P2, P3, P4, P5, P6, P8 Verification of basic information mill Confirmation of time bound plan & review of partial certification Land titles user rights Social aspects - SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the CU Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Occupational safety & health aspects, chemical management GHG Verification on safety and environment RSPO Supply Chain 2017 RSPO Supply chain standard implementation including model requirements Lunch Break					
1.30pm						
1.30pm – 5.00pm	Continue assessment at respective sites					
Date / Time	Coverage of assessment / Activity / Site	RAR	RZ	STK	DA	MZK
Day 2: 10/07	/2019 (Wednesday)					
8:00 am - 12:30 pm	Site observation to Terusan 1 Estate P1, P2, P3, P4, P5, P6, P7, P8 Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Land titles user rights Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighboring land use, riparian zone Occupational safety & health practice – witness activities at site Verification on GHG Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Training and safe use of agro-chemicals. Safety practices & chemical management Occupational safety & health practice – witness activities at site					
	Lunch Break					
12.30pm – 1.30pm						
•	Continue assessment at respective sites					

8:00 am - 12:30 pm	Site observation to Terusan 2 Estate P1, P2, P3, P4, P5, P6, P7, P8 Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Land titles user rights Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone Occupational safety & health practice – witness activities at site Verification on GHG Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting					
12.30pm –	 Training and safe use of agro-chemicals. Safety practices & chemical management Occupational safety & health practice – witness activities at site Lunch Break					
12.30pm – 1.30pm	LUIICII DIEAK					
1.30pm – 5.00pm	Continue assessment at respective sites					
Date / Time	Coverage of assessment / Activity / Site	RAR	RZ	STK	DA	MZK
Day 4: 12/07	/2019 (Friday)					
8.30am – 12.30pm	Site observation to Rumidi Estate P1, P2, P3, P4, P5, P6, P7, P8 Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Land titles user rights Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone Occupational safety & health practice – witness activities at site Verification on GHG Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, New planting Training and safe use of agro-chemicals. Safety practices & chemical management Occupational safety & health practice – witness activities at site					
12.30pm – 2.30pm	Lunch Dieak / Julilaat Player					
1.30pm – 3.00pm	Continue assessment at respective sites					
3.00pm – 4.00 pm	Audit Team discussion, preparation on audit findings and issuance of NCR (if any)					
4.00pm - 5.00pm	 Closing meeting – venue at Terusan POM Presentation of audit findings, positive comment, Question & answer 					

Attachment 3

RSPO P&C AUDIT CHECKLIST AND FINDINGS

Principle 1: COMMITMENT TO TRANSPARENCY

Clause		Indicators	Comply Yes/No	Findings
C 1.1 Growers and millers provide adequate information to relevant s/holders on env., social and legal issues relevant to RSPO Criteria, in appropriate	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	Terusan CU had continued to maintain a comprehensive system with respect to this criterion. Request Form for their stakeholders or other interested party who had viewed / obtained document related to RSPO and Record of Visitation by government agencies such as DOE and DOSH were maintained.
languages & 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	Records of communication were identified and maintained in different files depending on the stakeholder. For these records it was evident that the Terusan CU kept and maintained requests for information and responses. It was evident that the Terusan CU keeps and maintains requests for information and responses. And at the Terusan Palm Oil Mill, these documents and requests were kept in the Public Information Request Form and Procedure file.
C 1.2 Management	1.2.1	Land titles/user rights	YES	Evidence of legal ownership of the land including history of land tenure was verified during this audit.
documents are publicly available,		Occupational health and safety plans	YES	Occupational Health & Safety Plan titled 'PPB Oil Palms Berhad (Sabah Region) 2019 Occupational Safety & Health Plan' has been established.
except where this is prevented by commercial confidentiality or		Plans and impact assessments relating to environmental and social impacts	YES	Environmental impact assessment has been established and were currently being monitored.
where disclosure of information would		HCV documentation summary	YES	HCV documentation summary entitled 'HCV Documentation Summary for Labuk Region' was publicly available at the estates and mill offices.
result in negative environmental or		Pollution prevention and reduction plans	YES	Pollution prevention and reduction plans maintained available.
social outcomes.		Details of complaints and grievances	YES	The details of complaints and grievances can be accessed by the public/stakeholders at estates and mill offices. There was no evidence of any complaints received at Terusan 1, Terusan 2 and Rumidi Estates during this auditing period.
		Negotiation procedures	YES	Negotiation procedures are also available in the Wilmar Group's No Deforestration, No Peat, No Exploitation. Additionally, there was also the Dispute and Resolution Procedure involving external and internal stakeholders. It also explains the Group's conflict resolution process in

Clause	Indicators		Comply Yes/No	Findings
				a flowchart.
		Continual improvement plans	YES	Continual improvement plans were publicly available.
		Public summary of certification assessment report;	YES	The public certification summary report of Terusan CU can be assessed at SIRIM QAS website.
		Human Rights Policy	YES	A Wilmar Human Right Policy was available and verified. The Policy was exhibited at the Mill and Estate offices, and communicated to all levels of workforce and operations via training sessions and during muster briefings.
C 1.3 Growers and millers commit to ethical conduct in all business operations and transactions.	1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. Minor Compliance	YES	The policy is available, communicated during the Post-Arrival Orientation Talk.

Principle 2: COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

Clause	Indicators		Comply Yes/No	Findings
C 2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1	Evidence of compliance with relevant legal requirements shall be available. Major Compliance	YES	Generally, Terusan CU continues to comply with most of the applicable local, national and ratified international laws and regulations. Relevant licenses and permits such as DOE, DOSH, JTK, MPOB license, Energy Commission and Ministry of Domestic Trade for diesel storage were valid and displayed at the estate office. Site audit at operational areas and supporting facilities confirmed evidence of compliance. Foreign Workers had valid work permits and passports. For other Legal requirement, these legal were reviewed: Permit (JTK) to salary deduction, MPOB license, License "Menggaji pekerja bukan pemastautin", Permit to storage diesel, Trading license, Suruhanjaya Tenaga License, Fire Certificate etc. Other legal requirements were as follows: Steam Boiler and Unfired Pressure Vessel 1970, The Factories and Machinery (Notification, Certificate of Fitness and Inspection) Regulations 1970 Regulation 10(2), Noise Exposure Regulations 1989, OSH (Use and Standards Of Exposure of Chemicals Hazardous to Health Regulations 2000), Code of Practice in Confined Space 2010, EQ (Scheduled Wastes) Regulations 2005, EQ (Prescribe Premises)(CPO) Regulations 1978 etc.
	2.1.2	A doc. system, which incl. written information on legal	YES	Terusan CU have identified and documented their legal register with written information on legal requirements applicable to their operation. The record titled "Legal and Other Applicable"

Clause		Indicators	Comply Yes/No	Findings
		requirements shall be maintained. Minor Compliance		Requirements" and the Sustainability department is responsible to track changes in the law and the information was disseminated to all its plantations and mills.
	2.1.3	A mechanism for ensuring compliance shall be implemented. Minor Compliance	YES	Available i.e. internal audit.
	2.1.4	A system for tracking any changes in the law shall be implemented. Minor Compliance	YES	The CU maintained documented system for identifying and tracking the updates of the applicable legal requirements through various media such as LawNet, internet, newsletter, etc. The legal register management noted had been update accordingly.
C 2.2 The right to use the land is demonstrated, and is not legitimately contested by local people who can demo that they have legal, customary or user	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	Terusan 1 and Terusan 2 Estates both share the same land title issued by the Director of Land and Surveys to Sapi Plantations Sdn Bhd under Country Lease dated n March 1990. The land title valid until Dec 2088. The Country Lease also specifies that the land is only for the purposes of cultivation of oil palm. TPOM is located within the premises of Terusan 2 Estate. As for Rumidi Estate, they had the Country Lease issued by Director of Lands and Survey to Cadbury Brothers Limited in Dec 1965. The land was expressly alienated, among others, for the cultivation of cocoa or any other crop as may be approved by the Director of Agriculture. Then, in Dec 1971, the land was transferred by Cadbury Brothers Limited to Sabah Land Development Board (SLDB), and finally in Dec 1990, SLDB transferred the land to Sapi Plantations Sdn Bhd.
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	All Estates in Terusan Cu had maintained Legal maps showing boundary markers. Physical boundary markers were available and verified on Terusan Estate 1, Terusan Estate 2 and Rumidi Estate (a division of Terusan Estate 2).
	2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with FPIC. Minor Compliance	YES	There was no evidence of any land dispute involving the Terusan Palm Oil Mill, Terusan 1, Terusan 2 and Rumidi Estates. Therefore, this Indicator on payment of compensation using FPIC principles is not applicable.

Clause		Indicators	Comply Yes/No	Findings
	2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes are implemented&accepted by the parties involved. Major Compliance	YES	There was no evidence of any land conflict and disputes on land during this audit. This was verified through documentation review, interviews with Terusan CU management and local communities.
	2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties. Minor Compliance	YES	As stated in 2.2.4 above, there was no evidence of conflict and disputes on land during this audit. Hence, this criteria is not applicable.
	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 evidence that Terusan CU have instigated violence in maintaining peace and order in its current planned operations. This was verified through documentation review, interviews with Terusan CU management and local communities.
C 2.3 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free,	2.3.1	Maps of an appropriate scale showing the extent of recognised legal, customary or user rights shall be developed through participatory mapping involving affected parties. Major Compliance	YES	There was no evidence of any legal, customary or user rights within the Terusan CU and therefore this Indictor is not applicable.
prior, and informed consent.	2.3.2	Copies of negotiated agreements detailing the process of FPIC shall be available and shall include:	YES	As there were no land disputes nor payment of compensation to any legal, customary or user rights owners, no negotiated agreements have been entered into. Therefore, this Indicator is not applicable.
	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	As there were no land disputes nor payment of compensation to any legal, customary or user rights owners, no negotiated agreements have been entered into. Therefore, this Indicator was not applicable.

Clause		Indicators	Comply Yes/No	Findings
		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;	YES	As there were no land disputes nor payment of compensation to any legal, customary or user rights owners, no negotiated agreements have been entered into. Therefore, this Indicator was not applicable.
	c)	Evidence that the legal, economic, env & social implications for permitting ops on their land have been understood & accepted by affected comm, incl 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	YES	As there were no land disputes nor payment of compensation to any legal, customary or user rights owners, no negotiated agreements have been entered into. Therefore, this Indicator was not applicable.
	2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. Minor Compliance	YES	As there were no land disputes nor payment of compensation to any legal, customary or user rights owners, no negotiated agreements have been entered into. Therefore, this Indicator was not applicable.
	2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. Major Compliance	YES	As there were no land disputes nor payment of compensation to any legal, customary or user rights owners, no negotiated agreements have been entered into. Therefore, this Indicator was not applicable.

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

Clause		Indicators	Comply Yes/No	Findings
C 3.1 There is an implemented management plan that aims to achieve long-term economic and financial viability.	3.1.1	A business or management plan (minimum three years) shall be doc. That includes, where appropriate, a business case for scheme smallholders. Major Compliance	YES	Terusan CU had established and documented a management plan (budget) from 2019 to 2029. This long-range plan (budget) was verified. The budget allocations for the estates, included activities for operating expenditure i.e. upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, expenditure required for RSPO/MSPO compliance, etc. Attention was given to crop projection, cost of production, cost per ton and per hectare indicators to monitor the performance of each operating unit. The cost of production was reviewed and compared against expenditure each year with projections in place for future years.
	3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, shall be available. Minor Compliance	YES	Terusan CU had established and documented a management plan (budget) inclusive of a long-range replanting program from 2019 to 2029. This management plan inclusive of the replanting program was reviewed annually. The decision for replanting was based on factors like FFB crop availability for the mill, Yield, Height & Age of palms, market price of CPO, etc.

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

Clause		Indicators	Comply Yes/No	Findings
C 4.1 Operating procedures are appropriately documented, consistently implemented and monitored.	4.1.1	Standard Operating Procedures (SOPs) for estates and mills shall be documented. Major Compliance	YES	As for all Wimar International Limited estates, all 3 Estates, Terusan Estate 1, Terusan Estate 2 and Rumidi Estate continued to use the following established and documented SOPs: Wilmar International Limited, Agriculture Manual & SOP for Oil Palm 3/2011, Safety and Health Manual, Environmental Management System Procedures, Wilmar International Plantation Malaysian Operations Standard Operating Procedures Checklist.
	4.1.2	A mechanism to check consistent implementation of proc shall be in place. Minor Compliance	NO	The RSPO & MSPO internal audit has been used as the mechanism to ensure relevant procedures were in place and implemented accordingly. However, it was observed that the Beneficial Plants had been planted in these areas for replanting was not sufficient. As such the Minor NCR STK 01 2019 was issued.
	4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. Minor Compliance	YES	In Terusan POM, monthly monitoring for heavy machinery is done by operator in charged for all work stations. Sighted "Preventive Maintenance Checklist" that will be updated and summarized in monthly basis. Relevant records on implementation and monitoring of procedures as per the Agriculture Manual and other SOPs at the CU were verified. Among the records sighted were: Program sheets, Field cost books, ECO-Management Unit reports, Audits by Sustainability Officers, Harvesting Interval records, P & D census records, Fertiliser application records, Monthly Progressive Reports, scheduled wastes records, PPE Checklist etc. Most records are being maintained for more than a year and some much longer. Monthly Estate Report and Accounts were in the SAP databases. The

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Clause		Indicators	Comply Yes/No	Findings					
				main content in the SAP databases were oil palm crop report and yield statistics, progress of upkeep & cultivation (mature and Immature), harvesting & collection, store balance, labour position i.e. checkroll, information of employee, pay slips and wages. Bin cards have been used for monitoring stock inventory in the estate.					
	4.1.4	The mill shall record the origins of all third-party sourced FFB. Major Compliance	YES	Terusan POM receive 70% source of FFB from the outsider (smallholder, estates, & collecting centre). TPOM maintained the origin of all third party sourced FFB.					
C 4.2 Practices maintain soil fertility at or, where possible, improve oil fertility to a level that ensures optimal and sustained yield.	4.2.1	There shall be evidence that good agriculture practices, as contained in SOPs, are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. Minor Compliance	NO	As in all Wilmar International Limited Estates, Fertilizer application was of paramou importance for maintenance of soil fertility and the estates in Terusan CU continued apply fertilizers as per ECO -Management Unit recommendations made by Head of R& Department. However, at the time of visit, it was observed that Item 2.2.2 & 2.2.3 of placement of Fertilizers of Wilmar International Limited Agriculture & Standard Operating Procedure for Oil Palm 3/2011 was not complied with. At Terusan Estate 1, the NK Fertilizer was only broadcasted over half the palm circle in Block 22 instead of the overthe whole palm circle for which the Minor NCR STK 02 2019 was issued.					
•	4.2.2	Records of fertiliser inputs shall be maintained. Minor Compliance	YES	Fertilizer inputs were based on recommendation by the ECO Management Unit. T application programs were monitored using program sheets, bin cards, field cost bo and manuring program sheets. Records of programs and applications of fertilizers we available. Records of actual applied in 2018 was verified in all 3 estates.					
	4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. Minor Compliance	YES	Latest periodic foliar samplings were carried out in April 2019 by the appointed third party. Soil survey and assessment reports were also available and reviewed by the audit team.					
	4.2.4	A nutrient recycling strategy shall be in place, and may include use of EFB, POME, and palm residues. Minor Compliance	YES	All 3 Estates had a nutrient recycling strategy in place. Palm fronds were stacked in the fields to decompose and by EFB application.					
C 4.3 Practices minimise and control erosion and degradation of soils.	4.3.1	Maps of any fragile/marginal soils shall be available. Major Compliance	YES	Based on the soil maps provided the soil series were: Terusan 1 Terusan 2 Rumidi Ambun Ambun Bulanat Apas Apas Chempaka Bergosong Bergosong Lundang Guan Guan Malawali Inanam Inanam Medang Kilas Kilas Pinianakan Kumansi Kumansi Sabor Lumisir Nobusu Stom					

Clause		Indicators	Comply Yes/No	Findings					
				Nobusu	Tanjong Lipat	Sungai Meranti			
				Paliu Tamanong		Tebok Tok Yong	-		
				Tanjong Lipat		Tok Tong	1		
	4.3.2	A management strategy shall be in place for plantings on slopes between 9 and 25 degrees unless specified otherwise by the company's SOP. Minor Compliance		Terusan CU had a management strategy for planting on slopes and to minimise an control erosion and degradation of soils. The plantings on slopes was guided by it Agriculture Manual & Standard Operating Procedure for Oil Palm. The agronom department guided by Land Survey Department to established slope map for all estates No bare ground was sighted during the visit.					
	4.3.3	A road maintenance programme shall be in place. Minor Compliance	YES	well maintained a evidence of road	It was observed that the main and field roads in all 3 Estates of Terusan CU were very well maintained and accessibility were made possible by regular maintenance. There was evidence of road maintenance programs which consist of road resurfacing with grading and compaction and culvert maintenance.				
	4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover mngmt prog. shall be in place. Major Compliance	YES	In previous soil survey reports the Kilas series soil (organic soils) was considered as Peat. However, in order to confirm the presence of Peat Soils, an internal soil survey and soil analysis were conducted by EMU Sabah in June 2018. The full report was completed in July 2018. Result from the study revealed the area was not categorized as peat soil. As verified in Indicator 4.3.4, there were no Peat Soils in all 3 Estates in Terusan CU. As such this indicator was not applicable.					
	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						
	4.3.6	A management strategy shall be in place for other fragile and problem soils. Minor Compliance	NO	sulphate conditio records of water	n was not well ca level monitoring	arried out. On Terusa	ong" soil, which has potential acid an Estate 1 & Terusan Estate 2, soil areas were not available at time ed.		
C 4.4 Practices maintain the quality and availability of surface and ground water.	4.4.1	An implemented water management plan shall be in place. Minor Compliance Protection of water courses and	NO YES	objective was to and ecosystems water management However, there was Estate since May	meet the needs of are protected, the ent measures are was no evidence 2017. Hence, M	of existing and future ne nation water must re identified stage a e of monitoring the w linor NCR DA 01 20	ewed and updated accordingly. The epopulations and ensure that habitat the sustainable and renewable. The as part of the progress towards the vater quality treated water at Rumidi 19 was raised. Including maintaining and restoring		

Clause		Indicators	Comply Yes/No	Findings
		wetlands, including maintaining and restoring appropriate riparian and other buffer zones shall be demonstrated. Major Compliance		appropriate riparian buffer zones along all natural waterways.
	4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, shall be in compliance with national regulations. Minor Compliance	YES	Effluent license renewal application for year 2019/2020 and letter from Department of Environmental was available at Terusan POM to treat the POME. Effluent treatment process flow sighted in the Lay Out Effluent Pond. According to DOE's license, the disposal method of the final discharge is 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 result was within the limit.
	4.4.4	Mill water use per tonne of FFB shall be monitored. Minor Compliance	YES	Process water is obtained from water catchment near to the mill. The water usage per tonne of FFB continued to be monitored on monthly basis.
C 4.5 Pests, diseases,	4.5.1	Implementation of IPM plans shall be monitored. Major Compliance	YES	Terusan Estate 1, Terusan Estate 2 and Rumidi Estate continued to implement IPM as per Agricultural Manual and Standard Operating Procedure for Oil Palm.
weeds and invasive introduced species are effectively managed using appropriate IPM.	4.5.2	Training of those involved in IPM implementation shall be demonstrated. Minor Compliance	YES	Training related to IPM Implementation for the whole CU by officers from the Eco- Management Unit. It was observed that all training records had been properly filed. The records include information on the title of the training, name and signature of the attendees, name of the trainer, time and venue.
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. Provided in relevant internal manual and SOPs.It was found that no Class I chemicals had been used and additionally, paraquat had not been used since 2008.
	4.6.2	Records of pesticides use (incl. active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and no. of applications) shall be provided. Major Compliance	YES	All 3 estates continued to maintain records of pesticides used, including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications. Pesticides were used only when justified. Quantity and areas used are recorded in store issue chits, bin cards, program sheets, SAP system, costing records and progress reports. Records of pesticides used by area, quantity used, hectares applied and Ai/Ha were made available to auditors. LD50 was as per MSDS.
	4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with IPM plans. There	YES	As part of the IPM plans, management of all estates had established some nectariferous beneficial plants (<i>Cassia cobanensis, Antigonan leptopus and Turnera sublata</i>) nurseries for continuous planting in order to attract natural predators and thus to reduce use of

Clause	Indicators	Comply Yes/No	Findings
	shall be no prophylactic use of pesticides, except in specific situations identified in industry's Best Practice. Major Compliance		insecticides. Pheromone traps to trap Rhinoceros Beetles were sighted in the 2018 and 2019 replants in Terusan Estate 1, Terusan Estate 2 and Rumidi Estate.
	4.6.4 Pesticides that are categorised as World Health Organisation Class 1A/1B, or that are listed by the Stockholm or Rotterdam Convs, and paraquat, are not used, except in specific situations identified in industry's Best Practice. The use of such pesticides shall be minimised and/or eliminated as part of a plan, and shall only be used in exc. circumstances. Pesticides selected for use are those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regs.2000. Minor Compliance	YES	All 3 estates only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations (2000).
	4.6.5 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 & understood by workers. Major Compliance	YES	Application of any chemical products in the CU was under controlled and carried out by only qualified workers which have attended specific training related to chemical handling. Training records sighted.
	4.6.6 Storage of all pesticides shall be according to recognised best	YES	The chemical stores in mill and all estates were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974

Clause		Indicators	Comply Yes/No	Findings
		practices. All pesticide containers shall be properly disposed of and not used for other purposes. Pesticides shall be stored in accordance to the OSHA 1994 (Act 514) and Regs and Orders, Pesticides Act 1974 (Act 149) and Regs. Major Compliance		(Act 149). Records of purchase, storage and use were maintained. All of the stores were equipped with exhaust fans and the door was secured. Only authorized personnel are allowed to handle the chemicals. All the chemicals were segregated accordingly. Empty pesticides containers were triple rinsed, holes punched in them and stored separately in the scheduled wastes store awaiting proper disposal.
	4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. Minor Compliance	YES	The application of pesticides were in accordance with proven methods.
	4.6.8	Pesticides shall be applied aerially only where there is doc. justification. Communities shall be informed of impending aerial pesticide applications with relevant info within reasonable time prior to application. Major Compliance	YES	Pesticide applications were guided by Agriculture Manual & Standard Operating Procedure for Oil Palm, CHRA and by MSDS supplied by the manufacturer.
	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 involved in the production unit. All workers handling pesticides are regularly trained with safe working procedure. Training materials has been evaluated and made available during the audit. The staff and workers such as the storekeepers, sprayers and workers applying fertilizer were continuously trained. The trainings were regularly conducted by the estate management to enhance knowledge and skills of employees. The training included the safety aspects and usage of PPE. Records of training were maintained for verification.
	4.6.10	Proper disposal of waste material, according to proc that are fully-understood by workers and managers shall be demonstrated. Minor Compliance	YES	Standard Operating Procedure "Labeling, Handling, Storage, Transfer and Disposal of Scheduled Wastes", was available. 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 conditions, shall be demonstrated. Major Compliance	YES	The medical surveillance specific for pesticide operators were carried out accordingly.

Clause		Indicators	Comply Yes/No	Findings
	4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. Major Compliance	YES	At Terusan CU pregnant and breast-feeding women were strictly prohibited from any form of works that are exposed to chemical i.e. spraying, manuring, etc. Monthly medical check-up and written policy/statement was established related to prohibitted. There was no evidence that work with pesticides was undertaken by pregnant or breast-feeding women.
C 4.7 An OSH plan is documented, effectively communicated and	4.7.1	An OSH policy shall be in place. An OSH plan covering all activities shall be doc & implemented, its effectiveness monitored Major Compliance	YES	Occupational Health and Safety Policy for Wilmar International Limited has been established. 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.
implemented. 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, procedures and actions shall be doc and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. Major Compliance	YES	Hazard identification, risk assessment and risk control (HIRARC) and CHRA records covered activities in the all estates and mill were verified during the assessment.
	4.7.3	All workers involved in the operation shall be adequately trained in safe working practices. Adequate&appropriate protective eq. shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land prep, harvesting and, if it is used, burning. Major Compliance	YES	Training programme plan carried out for the year 2019, has included all appropriate training on safe working practice for all categories of workers. The programme covered 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 person/s shall be identified. There shall be records of regular mtg. with the responsible person/s & workers. Concerns of all parties about health, safety, welfare shall be discussed, any issues raised shall be recorded. Major Compliance	YES	Occupational Safety Health (OSH) Committee has been established. The OSH committee organisation chart for 2019 was available for all CU. The OSH Committee meeting 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. Minutes of meetings were verified.

Clause		Indicators	Comply Yes/No	Findings
	4.7.5	Accident & emergency procs shall exist and instructions shall be clearly understood. Accident procs shall be available in the appr language of the workforce. Assigned operatives trained in First Aid should be present in both field & other ops, and first aid eq shall be available at worksites. Records of all accidents shall be kept & periodically reviewed. Minor Compliance	YES	ERP was established and updated. 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. First Aid boxes were available at work operations at the 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). Samples verified accordingly.
	4.7.7	Occupational injuries shall be recorded using LTA metrics. Minor Compliance	YES	Terusan CU already established Lost Time Incident (LTI) summary for 2018/2019. Sighted the CU has maintained and updated the LTI Summary by monthly basis.
C 4.8 All staff, workers, smallholders and contract workers are appropriately trained.	4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO P&C, and that includes regular assessments of training needs and doc. of the prog. 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 Estates and POM.
	4.8.2	Records of training for each employee shall be maintained. Minor Compliance	YES	Training records available for verification.

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

Clause	(Jause Indicators		Comply Yes/No	Findings
C 5.1 Aspects of	5.1.1	An environmental impact assessment (EIA) shall be	YES	Identification of Environmental Aspect and Evaluation of Environmental Impacts, covered and analysis for all the activities, product and services in all operations of the operating
plantation and mill		documented. Major Compliance		units. It has been sighted during audit.
mgmt, incl	5.1.2	Where the identification of impacts	YES	Latest significant environmental aspects and impacts mitigation methods has been carried
replanting, that have		requires changes in current		out in Jan 2019 related to activities construction of new building, EFB, decanter cake and

Clause		Indicators	Comply Yes/No	Findings
env impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to		practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive action plan. The action plan shall identify the responsible person/s. Minor Compliance		dewatering solid. No changes were made to the environmental aspects and impacts or current practices which require changes in the environmental action plans. Nevertheless, the existing environmental action plans had identified timeframes and responsible person at each operating unit assessed.
demonstrate continual improvement.	5.1.3	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. Minor Compliance	NO	EAI management plan has covered for all operation. Action taken has been implemented by CU to mitigate the negative impact. However, significant environmental aspects and impacts mitigation methods on activity of diesel and petrol transportation, receiving, storage and dispensing was not effectively implemented and monitored. During site visit at Terusan 1 estate genset room (diesel storage), sighted diesel spillage on the ground. This practice is prohibited to land pollution. Thus, Minor NCR DA 02 2019 was raised.
C 5.2 The status of rare, threatened or endangered species other High	5.2.1	Information shall be collated in a HCV assessment that includes both the planted area itself and relevant wider landscape-level considerations. Major Compliance	YES	The HCVF scoping assessment of the estates had been completed by the Sustainability Dept. entitled "High Conservation Value Identification and Management, Terusan Palm Oil Estates 2009", dated in May 2009. From the assessment, it has been concluded that the HCV areas for the estates were 311.77 Ha.
Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and	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	As mentioned above, Terusan CU has established action plan for both HCVs area identified. The established plan has been reviewed in Jan 2019. There were no major changes to the HCV Plan, except awareness training, continuous monitoring for HCVs area by plant the camera trap and removal of invasive vines from areas indicated in the field along the Sungai Bangau – Bangau which have completely covered all the riparian vegetation in some areas.
operations managed to best ensure that they are maintained and/or enhanced.	5.2.3	There shall be a prog to regularly educate the workforce about the status of these RTE species, appropriate disciplinary measures	YES	A training programme for year 2019 was available. Among the training included the awareness training for HCV and RTE. The participants also were briefed on company's disciplinary action if found any employee capture, harm, collect or kill wildlife species. If caught, the management will report to the Wildlife Department for further action.

Clause		Indicators	Comply Yes/No	Findings
		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	Terusan CU has conducted monthly wildlife monitoring along the riparian zone and Forest boundary in order to detect the presence of wildlife in the plantation area. Monitoring activities were evident.
	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 Terusan CU. The HCV or land with slope more than 25° within the Terusan 2 Estate and Terusan 1 Estate were sets asides. The villagers were not allowed to hunt on encroach HCV area without getting permission from Terusan CU and authority department (Sabah Wildlife Dept and Sabah Forestry Dept). It was confirmed during interviewed with employees
C 5.3 Waste is reduced, recycled, re-used, and disposed of in an environmentally and socially responsible manner.	5.3.1	All waste products and sources of pollution shall be identified and documented. Major Compliance	YES	Terusan CU has documented identification of all waste product and sources of pollution. The waste and pollution- identification, prevention, mitigation and improvement plan were made available during audit. The most significant environmental receptors for the estates and mill operations were: •Air – Source from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping), GHG. •Water – Cleaning water/run-off/process station waters (hydrocyclone /sterilizer condensate/clarification waste) & boiler quenching water and blowdown. •Land – Scheduled waste, domestic waste and industrial/process waste, Nursery Operation, Estate operation, replanting operation, road maintenance. •Clinical waste – generated from Clinics.
	5.3.2	All chemicals and their containers shall be disposed of responsibly. Major Compliance	YES	The scheduled waste generated at TPOM were stored not more than 180 days. Last disposal was made in April 2019, carried out by a DOE licensed contractor.
	5.3.3	A waste management and	YES	Both waste management and disposal plan were in place and the implementation was

Clause		Indicators	Comply Yes/No	Findings
		disposal plan to avoid or reduce pollution shall be documented and implemented. Minor Compliance		evident.
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	Diesel reduction plan has been included in environmental management program and action plan has been prepared by Executive POM. The objective were to reduce diesel consumption. Among action has been taken to archive this target were: To monitor the diesel generator running hours, Monitored diesel generator and turbine running hour, To carried out preventive maintenance, To monitored biogas generator running and by the installation of the gas engine for biogas (expectation date completed on August 2019).
C 5.5 Use of fire for preparing land or replanting is avoided, except in specific situations	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. The CU adhered to the policy as per the Agricultural Manual and SSOP which advocates zero burning. All previous crop was felled, chipped/shredded, shredded, windrowed and left to decompose.
as identified in the ASEAN 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	As above.
C 5.6 Preamble Growers and millers commit to reporting on operational GHG emissions. However, it is	5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent.	YES	Mill and Estates has established Environmental Impact Assessment to collect data on any type of activities that cause pollutions and ways to mitigate it. Monitoring of mill gas emission is being done online using the CEMS and supported by Ringelmann Smoke Charts. Report show evidence that the emission is within the permissible limits of DOE as verified by document made available during on site visit to the Terusan POM. POME treatment, monitoring and land application was monitored, maintained and adhere to DOE requirement.
recognised that these significant emissions cannot be monitored completely or measured	5.6.2	Significant pollutants and GHG emissions shall be identified, and plans to reduce or minimise them implemented. Major Compliance	YES	Terusan CU had identified emission of GHG from their operations such as emission from their farm tractor and gen set operation. The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adverse impact the environment., Fuel Consumption, Peat Oxidation, POME and reported in the PalmGHG Summary Report.
accurately with current knowledge	5.6.3	A monitoring system shall be in place, with regular reporting on	YES	The CU had used RSPO Palm GHG version 3.0.1 Calculator as a tool to calculate the GHG emissions. The Terusan CU has used option 2 full version to calculate the data,

Clause	Indicators	Comply Yes/No		Findings				
and methodology. It is also recognised	progress for these significant pollutants and emissions from		submitted in July 201	19. Details as follov	vs:			
that it is not always	estate and mill operations, using		Description	tCO₂e/tProduct	Production	t/	yr	
feasible or practical to reduce or	appropriate tools. Minor Compliance		СРО	1.46	FFB Processed	2	19407.270	
minimise these	or		PK	1.46	CPO Processed		44992.913	
emissions. Growers and millers			Land Use		На	1		
commit to an implementation			OP Planted Area		10709.73			
period until the end			OP Planted on Peat		0.00			
of December 2016 for promoting best			Conservation (foresto	ed)	0.00			
practices in			Conservation (non-fo	prested)	3707.63			
reporting to the RSPO, and			Total	·	14417.36	_		
thereafter to public reporting. Growers			Milling extraction rate	.	l	⊥		
and millers make			OER	20.51 %				
this commitment with the support of			KER	4.54 %				
all other stakeholder			Mail Funicaiou					
groups of the RSPO.			Mill Emission	Own C	rop		7	
Plans to reduce			Emission source		tCO2e	tCO2e/tFFB		
pollution and			POME		7089.60			
emissions, including			Fuel consumption		339.79	0		
greenhouse gases,			Grid electricity utilisat	ion		0		
are developed,			Credits	talalis sa bassalaan o aa	(
implemented and			Export of excess election Sale of PKS	tricity to nousing & gr		0 0		
monitored.			Sale of FRS			0 0		
			Total		7429.39		†	
			Plantation / field emis	sion				
				Own Crop				
		1	Emission sources		tCO2e	tCO2e/ha	tCO2e/FFB	
		1	Land Conversion	Contilions	58722.23	8.60	0.98	
			*CO2 Emissions from	rerullser	4822.38	0.71	0.08	

Clause	Indicators	Comply Yes/No	Findings			
			**N2O Emissions	410	2.42 0.6	0.07
			Fuel Consumption	157	2.76 0.2	3 0.03
			Peat Oxidation		0.00	0.00
			Sinks			
			Crop Sequestration	-5566		
			Conservation Sequestration Total	1355	0.00 0.0 8.91 1.9	
			Total	1000	0.01	0.23
			Palm Oil Mill Effluent (POME) Treatment			1
			Diverted to compost		0%	
			Diverted to anaerobic digestion		100%	
			Diverted to Anaerobic Digestion			_
			Diverted to anaerobic pond		12%	
			Diverted to methane capture (flaring	g)	53%	
			Diverted to methane capture (electricity ge	eneration)	35%	

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

Clause	Indicators		Comply Yes/No	Findings	
C 6.1 Aspects of plantation and mill management that have social impacts, including replanting, are identified in a	6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. Major Compliance	YES	The Social Impact Assessment (SIA) for Terusan Oil Palm Plantations and Terusan Palm Oil Mill of PPB Oil Palm Berhad (Sabah) was prepared by Sustainability Unit, EMU dated in Apr 2009. Records of meetings, attendance and findings are duly documented and filed. The SIA covers aspects such as population, demographic profiles, economic activities, education level, living standard and income distribution, water supply source, infrastructure, grievances and complaints, safety and health and wellbeing of workplace, etc. It was evident that relevant stakeholders consulted.	
participatory way, and plans to mitigate the negative impacts and promote the positive ones are	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 SIA Report dated April 2009, there was evidence that the assessment was done with the participation of affected parties. These include discussion with more than 100 stakeholders held in Apr 2009, where interviews with households were held and personal opinions were able to be given freely. Additionally, management records were also used as part of the information for the assessment.	
made, implemented	6.1.3	Plans for avoidance or mitigation	YES	Pursuant to the SIA, annually updated Action Plans were prepared in consultation with	

Clause		Indicators	Comply Yes/No	Findings
and monitored, to demonstrate continual improvement.		of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented & timetabled, incl. responsibilities for implementation Major Compliance		affected parties. The Action Plans take into account feedbacks/inputs received from various stakeholders during annual Stakeholders' Meetings, Social and Welfare Committee meetings and Women and Children Committee Meetings. The Action Plan documents weaknesses/issues, proposed action to be taken, under whose responsibility, duration and status.
	6.1.4	The plans shall be reviewed as a min once every 2y 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 SIA Management Action Plans are being reviewed once a year. Based on minutes of meetings sighted, there is evidence that the review includes participation of affected parties, which include representatives of foreign and local workers, women and children committee members, and external stakeholders such as members of the local community.
	6.1.5	Particular attention shall be paid to the impacts of smallholder schemes. Minor Compliance	YES	There were independent smallholders who send FFBs to the Terusan Palm Oil Mill. They were identified as stakeholders and invited to attend stakeholder meeting at the Mill.
C 6.2 There are open and transparent methods for communication and consultation between growers	4.6.7	Consultation and communication procedures shall be documented. Major Compliance	YES	Consultation and communication procedures used by the CU in handling internal and external communications are in accordance to the "Standard Operating Procedure for Consultation and Communication. The CU has continued to use internal communication means, such as morning musters, displays on notice boards and posters, suggestion boxes and complaint forms. External communication was mainly through mail correspondence.
and/or millers, local communities and other affected or	6.2.2	A management official responsible for these issues shall be nominated. Minor Compliance	YES	Management official responsible in the communication and consultation with external stakeholders have been appointed accordingly.
interested parties	6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. Minor Compliance	YES	Stakeholder Lists for all Estates and Mill at the Terusan CU were sighted. These were all maintained and updated accordingly. The list contain details of the stakeholders, addresses and contact details. Evidence of communications is available in the form of letters of request from stakeholders.

Clause		Indicators	Comply Yes/No	Findings
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	There was a documented system used by the Terusan CU when dealing with complaints and grievances open to all affected parties. 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. The negotiation and mediation process specify that parties are to commit to observe the timeline and to act on the arrived decision and agree on punctuality. Additionally, parties are also to agree to a timeline of progress and other details.
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	Apart from complaints received from workers related to their house conditions, and request for repairs, there is no other evidence of dispute recorded. Complaint Forms are kept in a file and among those sampled were requests from workers related to house repairs.
C 6.4 Any negotiations concerning compensation for loss of legal,	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	For 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.
customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	6.4.2	A procedure for calculating and distributing fair compensation shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants & long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. Minor Compliance	YES	The procedure for calculating and distributing fair compensation is contained in the document entitled "Process for Identification of Legal and Customary Rights and Identifying People Entitled for Compensation". In it, the process of determining compensation is addressed. Furthermore, there was no evidence of any land dispute involving loss of legal, customary or user rights at the Terusan CU, and therefore the efficacy of the procedure could not be ascertained.
	6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties,	YES	There was no evidence of any negotiated agreements and compensation claims sighted in the documents.

Clause		Indicators	Comply Yes/No	Findings
		and made publicly available. Major Compliance		
C 6.5 Pay and conditions for employees and for contract workers always meet at least legal or industry	6.5.1	Documentation of pay and conditions shall be available. Major Compliance	YES	For the Terusan CU, documentation of pay and conditions are contained in the workers' salary slips and contracts of employment. Each pay slip contains the following information: workers' name and code, month of pay, basic salary of RM42.31 per day, allowances, piece rate amount, paid annual leave/public holiday, statutory deductions for EPF and SOCSO, total number of days worked, total number of rest days, overtime hours, annual leave/public holidays, etc.
minimum standards and are sufficient to provide decent living wages	6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment shall be available in the languages understood by the workers or explained carefully to them by a management official. Major Compliance	YES	All the employment contracts were prepared in Bahasa Malaysia and generally follows the format under the Sabah Labour Ordinance. Among the terms in the contracts include duration, place of work and job specification, workers' responsibilities, employers' responsibilities, workers' levy payable by employer, salary and allowances, working hours and overtime, public holiday, annual leave, medical leave, workers' work pass, maternity leave, insurance, etc. For foreign workers, their employment contracts also mention that the employer would pay for the costs of repatriation upon expiry of contracts.
	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	NO	Workers and staff are provided one house per family, or between 2 to 4 for unmarried workers, per house. Houses are generally maintained in good condition with free amenities provided for workers including bed frame, lighting, free electricity and treated water supply, and water storage tanks for each house. Workers interviewed confirm that the houses provided are comfortable and generally well maintained and any request for repairs are attended to within a reasonable time frame. Solid wastes are cleared between two to three times a week, and grass is mowed regularly. All units at the housing are being supplied with treated water. The SOP states that water sources from treated water (water catchment, river) and water tank (rainwater) to be sampled and tested at least twice a year. Drinking water analysis were sent to the third party every quarterly. However, during this audit, it was observed that: 1. Visiting Medical Officer visits the Terusan Clinic on a monthly basis instead of once a fortnight to supervise the operations and management of the clinic and to provide medical treatment to workers and their dependants. 2. No milk was provided at the Terusan 1, Terusan 2 and Rumidi creches; and no playthings are provided at the Terusan 2 & Rumidi creches. Therefore, a Major NCR RZ 01 of 2019 is raised (upgraded from Minor due to a recurrent non-compliance of the same Indicator).
	6.5.4	Growers and millers shall make demonstrable efforts to monitor and where able, improve workers' access to adequate, sufficient and	YES	It has been demonstrated by Terusan CU that efforts are made to ensure workers' access to adequate, sufficient and affordable food. This was evident by the presence of 3 sundry shops within Terusan CU. These shops sell sufficient supply of daily requirements such as rice, flour, eggs, sugar, milk, cooking oil, frozen food, beverages, toiletries, etc. The

Clause		Indicators	Comply Yes/No	Findings
		affordable food. Minor Compliance		price of each item is clearly marked, and they differ slightly between cash and credit purchases. The canteen/sundry shop at the Mill is still closed following renovation. It is now pending tender process to choose a new operator. In addition, Terusan CU allows access to vendors to sell fish and vegetables at the housing area. This accords the workers with a variety of options and access to adequate, sufficient and affordable food. Price listings were sighted at the sundry shops visited.
C 6.6 The employer respects the rights of all personnel to form and join trade	6.6.1	A published statement in local languages recognising freedom of association shall be available. Major Compliance	YES	Copies of a notification written in Bahasa Malaysia and updated in July 2017 are exhibited at the Mill and Estate notice boards. The notification states, among others, that all employees are free to join any association, body, or religious organisations on the condition that these have not been declared illegal, and that the activities do not disrupt local harmony.
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	Although there were no official trade unions operating within the Terusan CU, workers appoint their own representatives via voting process to sit on the Social and Welfare Committees. The Social and Welfare Committees comprise representatives of foreign and local workers and management representatives. Among the issues included request for drain repair at the housing area, installation of spotlight at the takraw court, school bus stop at the staff quarters, installation of streetlight for kids going to HUMANA, etc.
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 Wilmar Group Child Labour Policy was publicly available at the offices of the CU members. The policy stated the company commitments not to employ children, and the policy defines 'child' in accordance with the ILO Convention definition irrespective of what the local and national law stipulates. A review of the workers' list show that all workers at the POM, Terusan 1, Terusan 2 and Rumidi estates are above 18 years of age.
C 6.8 Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual	6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. Major Compliance Evidence shall be provided that	YES	The Wilmar Group Equal Opportunity Policy was available at the POM and estates This Policy stated the equal opportunity in all aspects of its employment including recruitment, training and promotion. The Policy identifies under-represented groups where they are encouraged to apply for training and employment opportunities with the Company, and that where possible, special training will be provided for such groups to prepare them to compete on equal terms for jobs and promotion. Based on workers' employment contracts and confirmed during interviews conducted with

Clause		Indicators	Comply Yes/No	Findings
orientation, union membership, political affiliation, or age, is prohibited.		employees and groups including local communities, women, and migrant workers have not been discriminated against. Major Compliance		local and foreign workers (both male and female) who work as general workers, sprayers, manurer and harvesters, there was no evidence that they have been discriminated against in terms of employment, wages paid, work assignments, housing allocations and other benefits.
	6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion where relevant are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. Minor Compliance	YES	As stipulated in the "Recruitment selection, Hiring and Promotion" and "Recruitment of Workers" for workers the recruitment selection, hiring and promotion where relevant are based on availability, skills, capabilities, qualities, and medical fitness necessary for the jobs.
C 6.9 There is no harassment or abuse in the work place, and reproductive rights are protected.	6.9.1	A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. Major Compliance	YES	Terusan CU applies Wilmar's Policy on 'Sexual Harassment, Violence and Abuse, Reproductive Rights Policy', which has been prepared in English and Bahasa Malaysia and exhibited prominently at the Mill and Estate offices, notice boards, muster grounds and housing complexes. Among other things, this Policy defines what is sexual harassment, violence, abuse and reproductive rights, as well as implementation and enforcement of the Policy. This includes how investigations are to be conducted, and emphasised the confidential nature of the investigations. The policy had been communicated to all staffs and workers during morning musters and trainings.
	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 same policy as above.
	6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. Minor Compliance	YES	Site interviews conducted with the workers (manurers, sprayers, harvesters) confirm their understanding of what their rights are and the specific grievance mechanism process in sexual harassment cases.
C 6.10 Growers and millers deal fairly and	6.10.1	Current and past prices paid for FFB shall be publicly available. Minor Compliance	YES	It was verified that Terusan POM continues to evidently display at the weighbridge notice board the prices of FFB from January to June 2019.
transparently with smallholders and	6.10.2	Evidence shall be available that growers/millers have explained	YES	Based on the interviews conducted with one of the FFB supplier, it was verified that TPOM has documented all monthly transactions (such dates of delivery, FFB weight,

Clause		Indicators	Comply Yes/No	Findings
other local businesses.		FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented. Major Compliance		amount payable) on the slips given.
	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	Selection of contractors and suppliers for services are carried out via a tender system, and decided by a Tender Committee located at the Wilmar Regional Office in Sandakan. Once selected, the contractor would be required to sign an agreement, the terms of which can be subject to negotiations between the parties. Based on the above documentation reviews and interviews conducted, it was verified that the contractors understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.
	6.10.4	Agreed payments shall be made in a timely manner. Minor Compliance	YES	As confirmed during interviews with the CPO and FFB transporters as well as FFB supplier, all payments are made in a timely manner, which is within one month of invoice.
C 6.11 Growers and millers contribute to local Sustainable development where appropriate.	6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. Minor Compliance	YES	The main contribution by Terusan CU to the local development is in the form of job opportunities. Based on the workforce record, 41% of total employees were from the local community. The TPOM commenced its Fertilizer Supply Credit Scheme in Nov 2017 where smallholders identified by the village head were offered to receive fertilizer. Subject to agreed terms and conditions, repayments can be made in three separate instalments which will be offset against the FFB sold to the Mill. So far 6 smallholders from nearby villages were participating in this scheme. They were made aware of this scheme by way of notifications issued by the Mill. Third Party Agronomist from the Company will visit the smallholders to advice on good agricultural practices.
	6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. Minor Compliance	YES	There is no scheme smallholders involved in Terusan CU. However, some smallholders within the vicinity of the Terusan Palm Oil Mill do send their fresh fruit bunches to the Mill. Third Party Agronomist from the Company assists in improving the smallholders' productivity by encouraging them to take empty fruit bunches for purposes of land application. Additionally, technical advice on good agriculture practices is also being provided to the smallholders.
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	The Company's "No Deforestation, No Peat, No Exploitation Policy", include a commitment to respect and recognize the rights of all workers including contract, temporary and migrant workers. Once at the estate/mill, there is also no restriction for the foreign workers to leave.
	6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. Minor Compliance	YES	Employment of foreign workers are mainly done through word of mouth, via relatives who are already working at the estates/mill. From sample workers contracts and interviews, there was no evidence of contract substitution found.
	6.12.3	Where temporary or foreign workers are employed, a special	YES	Post Arrival Orientation talk was held for newly arrived workers. Among the topics covered included the labour & immigration law, criminal and road transport law, job

Clause	Indicators		Comply Yes/No	Findings
		labour policy and procedures shall be established and implemented. Major Compliance		contracts, safety and health, Wilmar's policies, and RSPO/MSPO/ISCC certifications.
C 6.13 Growers and millers respect human rights	6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations. Major Compliance	YES	A Wilmar Human Right Policy was available and verified. The Policy is exhibited at the Mill and Estate offices and communicated to all levels of workforce and operations via training sessions and during muster briefings.
	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	Educational facilities such as HUMANA school is located within the estate premises for the children of Indonesian workers.

Principle 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

Auditors has verified through checking the www.globalforestwatch.com, GOOGLE Maps, Estate Maps and also through site visit to the estate area of Terusan Estate 1 & 2 and Rumidi. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at Terusan CU. Hence, this indicator was not applicable.

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

Clause		Indicators		Findings
C 8.1	8.1.1	The action plan for continual		
Growers and millers		improvement shall be		
regularly monitor		implemented, based on a		
and review their		consideration of the main social		
activities, and		and environmental impacts and		
develop and		opportunities of the grower/mill,		
implement action		and shall include a range of		
plans that allow		indicators covered by these		
demonstrable		Principles and Criteria.		
continual		As a minimum, these shall		
improvement in key		include, but are not necessarily be		
operations.		limited to:		

Clause		Indicators	Comply Yes/No	Findings
	a)	Reduction in use of pesticides (Criterion 4.6);	YES	All estates continued to manage pests, disease and weeds using appropriate IPM techniques. In order to minimize use of insecticides, the estates have established nurseries for beneficial plants mainly <i>Tunera subulata, Cassia cobanensis and Antigonon leptopus</i> . This was to ensure continuity in the planting of beneficial plants. The estates were committed to reduce the use of chemicals. The estates have implemented and will continue to only spray Circles (Strip) and noxious weeds. Spraying was only carried when required. Soft weeds and <i>Nephrolepis bisserata</i> were maintained and encouraged in the inter rows. EFB was applied in single layers and was not dumped in large amounts to prevent breeding of Rhinoceros Beetles. To ensure efficient loose fruit collection, circle raking was carried to avoid VOPs from merged and for the purpose to reduce of chemical usage.
	b)	Environmental impacts (Criteria 4.3, 5.1 and 5.2);	YES	The CU maintained established and implemented environmental improvement plans and measures. Among content of plans 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.
	c)	Waste reduction (Criterion 5.3);	YES	The CU continued established and implemented waste reduction plans. Among the plans were: • Environmental Improvement Plan - Environmental Impact Evaluation (EIE). • Waste Management Action Plan 2017/18. • Environmental Management Programme (EMP). • Pollution Prevention Plan. • Identification and Management of Wastewater.
	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 3 unit of solar panel for lighting of guard houses, and periodical maintenance of tractor and power generator, application of organic material (biomass) as fertilizer. Management also used a biogas as a source of electricity at line site areas.
	e) f)	Social impacts (Criterion 6.1); Encourage optimising the yield of the supply base Major Compliance	YES YES	It will be carried out as per the Company's Community Development Plan 2019. In order to optimise yields, both Estates were committed to implement best agricultural practices inclusive of timely and proper fertiliser application, Improve on accessibility to maximise crop evacuation, maintaining harvesting interval below 10 days, To collect all loose fruit to minimise losses, water bodies and water conservation pits were constructed to conserve moisture.

RSPO CERTIFICATIONS SYSTEMS FOR PRINCIPLES & CRITERIA JUNE 2017

	Indic	ators	Comply Yes/No	Findings
4.5.3 Time-bound plan Note: Where there are isolated lapses in implementation	(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.
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-	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	YES	Details of the Time Bound Plan described as per attachment 7.
compliance shall 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);	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.
4.5.4 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. Any new plantings since 1 st January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	NO	Sighted internal audit assessment report has been carried out for clause 4.2.4 (e)-(h) of certification system for units such as: Indonesia Units Ksu Mutiara Bosa Sikilang onJune 2018 Kud Damai Sejahtera on June 2018 Kud Kapar on June 2018 Koperasi Karya Makmur Pahirangan on February 2019 Koperasi Karya Makmur Sejahtera on January 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;		 Kud Permata Sawit Maligi on June 2018 Kud Rantau Pasaman Sasak on June 2018 Pt. Buluh Cawang Plantation on June 2018 Pt. Daya Landak Plantation on June 2018 Pt. Indoresin Putra Mandiri on June 2018

	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3; Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;		- Pt. Putra Indotropical on June 2018 - Pt. Pratama Prosentindo on June 2018 - Pt. Agronusa Investama – PAHAUMAN on June 2018 - Pt. Sarana Titian Permata Pom 2 on january 2019 - Koperasi Tuah Jubata on February 2019 Arica Units Piece Plantation Limited (RPL) on February 2010
	(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:	NO	Biase Plantation Limited (BPL) on February 2019 Eyop Industries Limited (EIL) on february 2019 Malaysia Units Jebawang Sdn Bhd – Laba Utama on April 2019 Suburmas Plantation Sdn Bhd on April 2019 However, supporting documentation for self - declaration was inadequate. Evidences & document reference such as HCV report results, land title, Racp status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc
		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.		was not adequate in the report for all uncertified management units. Refer to NCR Minor RAR 01 2019.
		Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.		
		A desktop study e.g. web check on relevant complaints		
		If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.		
4.6.4 The CB shall review whether oil palm operations have been established in areas which were previously owned by		No additional indicators		As mentioned in 2.2.1 of this checklist, Terusan 1 and Terusan 2 Estates (inclusive of TPOM) shared the same land title issued by the Director of Land and Surveys to Sapi Plantations Sdn Bhd as Country Lease. The Country Lease also specifies that the land was only for the purposes of cultivation of oil palm. As for Rumidi Estate, total of 56.80 ha was excised from Sabah Land

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.	Development Board (SLDB) to Kg Gandah Jati being settlement of a land claim with the local communities. As of the date of this audit, the land title is still pending issuance by the Land and Survey Department, Sabah. However, to honour the agreed terms, Rumidi Estate has excluded the area of 56.80 ha from its total Area Statement.
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Note:

- 1. For requirements 4.5.4 (a)-(d) above, the definition of major and minor NC is stated in the RSPO P&C.

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

Attachment 4

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

P & C Indicator	Specificati on Major/Min or	Detail Non-conformances	Corrective Action Taken by the CU	Verification by Auditors
Indicator 4.1.2 STK 01 2019	Minor	Finding: Table 8.10 of Chapter 8 (Pest of Oil Palm) of Wilmar International Limited Agriculture & Standard Operating Procedure for Oil Palm 3/2011 on Cultural Control Method was not complied with. Objective evidence: Terusan Estate 1 & Terusan Estate 2 — Though extensive replanting had been carried out the planting of Beneficial Plants was not in tandem, that is not sufficient Beneficial Plants had been planted in these areas	Nursery for cultivating beneficial plant i.e Cassia cobaneensis, Tunera spp, and Antigonan leptopus will be established. Expected of completion on August 2019 and planting of these benifial plants is expected to commence in September 2019.	Corrective action plan accepted The effectiveness of implementation will be verified during next audit Status: Open
Indicator 4.2.1. STK 02 2019	Minor	Finding: Item 2.2.2 & 2.2.3 on placement of Fertilizers of Wilmar International Limited Agriculture & Standard Operating Procedure for Oil Palm 3/2011 was not complied with. Objective evidence: Terusan Estate 1 – It was observed that NPK Fertilizer was only broadcasted over half the palm circle in Block 22 instead of the over the whole palm circle.	Intensive training for the fertilizer applicators, mandores, trainee field assistants and staff in charge will be conducted focusing on the correct standard of fertilizer placement.	Corrective action plan accepted The effectiveness of implementation will be verified during next audit Status: Open
Indicator 4.3.6 STK 03 2019	Minor	Finding: Management of the "Bergosong" soil, which has potential acid sulphate condition was not well carried out. Objective evidence: Terusan Estate 1 & Terusan Estate 2 – Records of water level monitoring for the "Bergosong" soil areas were not available at time of visit.	The standard operation procedure on water management on "Bergosong" or potential acid sul[phate will be developed and used for monitoring the water level, expected date of completion October 2019.	Corrective action plan accepted The effectiveness of implementation will be verified during next audit Status: Open
Indicator 4.4.1 DA 01 2019	Minor	Finding: The water management plan for Rumidi Estate was not effectively implemented and monitored. Objective evidence: Sighted there is no evidence of monitoring the water quality treated water at Rumidi Estate since May 2017.	Treated water samples will be taken starting on September 2019 onwards for every four months by external laboratory Advance Chemtech, the consultant contracted to do monitoring and testing.	Corrective action plan accepted The effectiveness of implementation will be verified during next audit Status: Open

Indicator	Minor	Finding	A cemented bund will be constructed on the	Corrective action plan accented
Indicator	Minor	Finding:		Corrective action plan accepted
5.1.3		Significant environmental aspects and impacts mitigation	area where diesel is being channelled out into	The effectiveness of implementation
		methods on activity of diesel and petrol transportation,	the skid tank. Any spillage will be contained	will be verified during next audit
DA 02 2019		receiving, storage and dispensing was not effectively	and reclaimed. A new oil trap will be also	
		implemented and monitored.	constructed to trap diesel. Expectation dayte	Status : Open
		Objective evidence:	completed on September 2019.	
		During site visit at Terusan 1 Estate genset room, sighted		
		diesel spillage on the ground near to the diesel storage.		
Indicator	Major	Finding:	1. Visiting Medical Officer- Dr Kelvin Choo	1. Sighted an evidence of Memo
6.5.3	_	1. Visiting Medical Officer (VMO) visits to the Terusan	Siew Peng from Klinik Kelvin has been	from Group Manager
		Estate Clinic does not comply with the requirements	engaged to do the visit twice a month.	Sustainability to CU related to
RZ 01 2019		of Section 19(3) of the Workers' Minimum Standards		VMO visiting 2 times a month.
		of Housing and Amenities Act 1990.	three creches on September 2019.	Auditor also sighted acceptance
		2. Terusan 1 Estate, Terusan 2 Estates, and Rumidi	and didding on deptember 2010.	letter from Dr Choo Siew Peng as
		Estate do not comply with the requirements of		their VMO on 26 September 2019.
		Section 10(3) of the Workers' Minimum Standards of		2. Sighted the pictorial evidence
		Housing and Amenities Act 1990.		whereby milk and toys were
		Objective evidence: 1. Dates of VMO visits to the Terusan Estate clinic were		provided at the three creches in
				September 2019. Management
		as follows: 2 Jan 209, 16 Feb 2019, 16 March 2019,		also established a SOP
		4 May 2019, 25 May 2019, 29 June 2019. This is not		"Pengagihan dan Pemberian
		in compliance with Section 19(3) of the Workers'		Susu Formula di Creche" to kids
		Minimum Standards of Housing and Amenities Act		twice times per days.
		1990 which requires for a registered medical		
		practitioner to visit the clinic at least once a fortnight		Status: closed - the effectiveness
		to supervise the operations and management of the		of implementation will be verified
		clinic and to provide medical treatment to workers		during next audit
		and their dependants.		
		2. Creches at Terusan 1, Terusan 2 and Rumidi Estates		
		are not provided with milk. The creche at Terusan 2		
		and Rumidi Estates are not provided playthings. This		
		is not in compliance with Section 10(3) of the		
		Workers' Minimum Standards of Housing and		
		Amenities Act 1990 which requires that on each day		
		a dependant is accommodated at the nursery, he		
		shall be provided by the employer at his own expense		
		with a supply of milk in sufficient quantity and of good		
		quality and play equipment.		

Indicator	Minor	Finding:	All the required documents will be obtained	Corrective action plan accepted.
4.5.4		(e)The audit team shall assess compliance with these rules at	and expected the self-assessment could be	The effectiveness of implementation
(RSPO		each assessment of any of the applicable management units.	fully completed by Dec 2019.	will be verified during next audit.
Certification		Assessment of compliance with requirements 4.5.4 (a) - (d)		
System		above by the audit team based on self- declarations only by		Status : Open
2017)		the company, with no other supporting documentation, shall		
		not be acceptable.		
RAR 01		Objective evidence:		
2019		Evidences & document reference such as HCV report results,		
		land title, Racp status, LUCA status, planting statement, SOP		
		for identifying legal, customary or user rights, and a procedure		
		for identifying people entitled to compensation, SOP		
		calculating and distributing fair compensation, etc was not		
		available for all uncertified management units.		

Attachment 5

RSPO SUPPLY CHAIN: AUDIT CHECKLIST

SECTION A: GENERAL INFORMATION

1.	File Reference No.	1:	EP09760002
2.	Name of facility/ site(s) /entity(ies)	1:	Wilmar International Limited – Terusan POM
3.	Site Location (single site/multisite/Group)	1:	KM 115, Bintulu-Miri Road,
			97008 Bintulu,
			Sarawak
4.	SC model	:	Mass Balance
5.	Type of entity	:	Mill / Crusher / Refinery / Biodiesel plant / Primary Oleochemical / Secondary
			Oleochemical / End product manufacturer
			For oleochemicals and its derivatives, please check the conversion factor against the
			"RSPO Rules for Oleochemicals and its Derivatives" dated 1st December 2016
6.	RSPO Member Number	:	RSPO membership no : 2-0017-05-000-00
			Registered under parent company: WILMAR INTERNATIONAL LIMITED
7.	Annual summary records of certified oil palm products purchased and	:	Actual for last year for period of June 18 until July 19
	claimed		CPO Projected: 16,339.77 mt
			PK Projected: 3,193.68 mt
			Overall CPO Sell: 40,673.11 mt
			CPO Claim as Mass Balance: 4,819.01 mt
			CPO Claim under another scheme: 9,545.55 mt
			CPO Claim as Non-RSPO (sales of non-certified): 26,308.55mt
			Overall PK Sell: 8,983.07 mt
			PK Claim as Mass Balance: 3,142.78 mt
			PK Claim as Non-RSPO (sales of non-certified): 5,840.29 mt

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

	Requirements	Remarks
	Audit Process Requirements – FOR STAGE 2 / RECERTIFICATION	AUDIT
5.3.8	The certification audit shall review whether the organizational systems, the management systems and the operational systems, including any documented policies and procedures of the organization seeking or holding certification, are sufficient and adequately implemented to meet the intent and requirements of the RSPO Supply Chain Certification Standard.	NA
	Audit Process Requirements – SURVEILLANCE AUDIT	
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.	Terusan POM Organizational, management systems and the operational systems, documented policies and procedures of the organization holding certification, are sufficient and adequately implemented to meet the intent and requirements of the RSPO Supply Chain Certification Standard. Sighted Terusan palm oil mill has updated and change the name of documented procedure named RSPO Supply Chain Certification Procedure dated in Jan 2019. Among the documented requirements related to Mill Supply Chain definition, delivery of FFB to mill, delivery of CPO and PK to refinery, mass balance calculation, daily production report, checking validity of the certification of the suppliers, Internal Audit, Management Review. There was no evidence that Terusan POM seeking certification outsources activities to independent third parties.

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

	Requirements	Remarks
1	Applicability of the general chain of custody requirements for the supply chain	
1.1	Organization takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. Additional Guidance: - For client with SG or IP in the scope, check the weighbridge system, packaging, receiving, loading and storage facility area.	Terusan 2 POM has legal ownership and physically handles RSPO certified sustainable crude palm oil and palm kernel.
1.2	Traders and distributors require a license 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.	
1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.	RSPO membership no : 2-0017-05-000-00 Registered under parent company: WILMAR INTERNATIONAL LIMITED
1.4	Processing aids do not need to be included within an organization's scope of certification.	No processing aid involved in Terusan POM scope of certification
2	Supply chain model	
2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance. Additional Guidance: For MB check the conversion factor used and the mass balance table.	Terusan POM has aware on the need to downgrading of supply chain model. Not applicable since this mill is a Mass Balance mill
2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Terusan POM has continued to maintain MB model.
3	Documented procedures	
3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:	
a)	Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.	Supply chain procedure was developed to follow RSPO SCCS 2017 namely RSPO Supply Chain Certification Procedure dated in Jan 2019. The Procedure was sighted and found all elements of the RSPO Supply Chain standard were covered.
b)	Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).	Sighted CPO and PK production record, weighbridge report, dispatch record and training record was up to date and well maintained.
c)	Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization's procedures for the implementation of this standard.	Mill Manager have the overall responsibility and authority over the implementation of RSPO supply chain requirement in RSPO Terusan POM. Sighted appointment letter dated in Jan 2019. Interview with sustainability committee member, mill manager, assistant mill manager & weighbridge operator was confirmed they are understood the supply chain requirements.
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	RSPO internal audit was conducted in Nov 2018 by the team of internal auditor. The internal audit has followed the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. There are 1 nonconformance report (NCR) has been raised and already closed by the Terusan management. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor.

	L contain in the containment of	1
	within its organization.	•
	Any non-conformities found as part of the internal audit shall be issued	
	corrective action. The outcomes of the internal audits and all actions	
	taken to correct nonconformities shall be subject to management	
	review at least annually. The organization shall be able to maintain the	
	internal audit records and reports.	
4	Purchasing and goods in	
4.1	The receiving site shall ensure that purchases of RSPO certified oil	The required was available. Verified during audit.
	palm products are in compliance and following minimum information for	
	RSPO certified products is made available by the supplier in document	
	form:	
	The name and address of the buyer;	
	The name and address of the seller:	
	1	
	The loading or shipment / delivery date; The data are which the decreased are as is a set to the decreased are as it is a set to the decreased are as	
	The date on which the documents were issued;	
	A description of the product, including the applicable supply chain	
	model (Identity Preserved, Segregated or Mass Balance or the	
	approved abbreviations);	
	The quantity of the products delivered;	
	Any related transport documentation;	
	Supply Chain certificate number of the seller;	
	A unique identification number.	
	Information shall be complete and can be presented either on a single	
	document or across a range of documents issued for RSPO certified oil	
	palm products (for example, delivery notes, shipping documents and	
	specification documentation).	
a)	The site shall have documentation that demonstrate that purchases are	Terusan POM had continued received source of RSPO certified FFB from own group
1	made to the material category agreed with their supplier (IP, SG or	estate and smallholders.
	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 supplier's Supply	
	Chain number.	
	Ondin numbol.	

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.	Terusan POM has registered in IT platform
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. Additional Guidance: - Request for list of suppliers - Request the PIC to demonstrate where in the RSPO IT platform this can be found.	Checked an verified.
4.2	The site shall have a mechanism in place for handling non-conforming material and/or documents.	Terusan POM has established Weighbridge Nett to control incoming material and outgoing products. The FFB supplier & Product buyer & its vehicle registration has to been registered in the system prior weighing. The mechanism to handle nonconforming material/documents such as validity of certificate supplying estate was available.
5	Outsourcing activities	
5.1	In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. This requirement should not apply to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the organization (not the tank farm manager). Additional Guidance: Request for list of appointed subcontractors Check on the availability of signed agreement or contract on the outsourced activity.	There are 1 outsource company CPO and PK. The agreement document was available and communication on the RSPO supply chain requirement were communicated to them. Record of training was sighted.
5.2	Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: a) The site has legal ownership of all input material to be included in outsourced processes; b) The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable	a) There are 1 outsource company CPO and PK transporter. b) There is contract document between Terusan POM and the transporters. c) The RSPO Supply Chain procedure has described on outsource activity. d) During stakeholder meeting there are several CPO Transporter attended the meeting which highlight on the RSPO issue.
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	agreement with the contractor. The responsibility is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance. Additional Guidance: - Check the signed agreement has included a provision as required in para (d) of this requirement.	Inspection was carried out as additional effort to ensure no contamination sighted book at AP Post.
5.3	The site shall record the names and contact details of all contractors used for the processing or production of RSPO certified materials.	List of contact person for both transporters were made available and up-to-date.
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.	No new contractors used for the processing or production of RSPO certified materials.
6	Sales and goods out	
6.1	The organization shall ensure that the following minimum information for RSPO certified products is made available in document form. Information must be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation): The name and address of the buyer; The name and address of the seller; The loading or delivery date; The date on which the documents were issued; A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; Supply chain certificate number; A unique identification number.	The procedure in handling of sale and delivery was sighted and found adequate. Sales activities usually handled by PPB Oil Palms Berhad and Marketing Department (HQ) on behalf of Terusan POM.

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 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 Conduct traceability verification during the audit. 	
Registration of transactions	
 Supply chain actors who: are supply chain actors between the mill and final refinery; take legal ownership and physically handle RSPO Certified Sustainable oil palm products; and are part of the supply chain of RSPO Certified Sustainable oil palm products must register their transaction in the RSPO IT platform at the time of physical shipment as required by the rules set by RSPO. 	Terusan POM has legal ownership and physical handle RSPO certified sustainable CPO and PK.
Training	
The organization shall have a defined training plan, which is subject to on-going review and is supported by records of the training provided to staff. Additional Guidance: - Availability of an approved annual training plan; and - Training record (training attendance list)	Training plan has included the RSPO Supply chain training scheduled in August 2019 for staff & workers.
Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification system. Training shall be specific and relevant to the task(s) performed. 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.	Training carried out accordingly. Attendance list & photograph was seen.
Record keeping	
The site shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.	Sighted CPO and PK delivery note, weighbridge ticket, production data and internal audit records were found up-to-date.
	and the minimum number of samples selected shall be based on the square root formula for each customer Conduct traceability verification during the audit. Registration of transactions Supply chain actors who: are supply chain actors between the mill and final refinery; take legal ownership and physically handle RSPO Certified Sustainable oil palm products; and are part of the supply chain of RSPO Certified Sustainable oil palm products must register their transaction in the RSPO IT platform at the time of physical shipment as required by the rules set by RSPO. Training The organization shall have a defined training plan, which is subject to on-going review and is supported by records of the training provided to staff. Additional Guidance: Availability of an approved annual training plan; and Training record (training attendance list) Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification system. Training shall be specific and relevant to the task(s) performed. 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. Record keeping

9.2	Retention times for all records and reports shall be a minimum of two (2) years and must comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	Relevant record was maintained for more than 2 years
9.3	The organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	Record available.
10	Conversion factors	
5.10.1	Where applicable a conversion rate must be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which must be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org). This is in particular relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries. The guidance document for oleochemicals is available on the RSPO website (www.rspo.org). 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	The actual OER and KER has been used as the conversion rates.
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.	Daily OER & KER were provided in the production report. Both conversion rates were monitored on monthly basis to check their performance against industry average.
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. RSPO RULES ON COMMUNCIATIONS AND CLAIMS – General corporations	Relevant information on product claim (including applicable SC model and certificate no.) being correctly indicated in the relevant outgoing paperwork e.g. PK billing, CPO billing, TPOM weighbridge advice ticket and TPOM palm kernel/ CPO delivery note. Drate communications – NOT APPLICABLE
12	Complaints	
12.1	The organization shall have in place and maintain documented	Documented procedure has established to address collecting and resolving the complaint.

	procedures for collecting and resolving stakeholder complaints. Additional guidance - Procedure shall cover complaints from customers and stakeholders.	Sighted in the RSPO Supply Chain Certification Procedure clause 10. Complaint Procedure.
13	Management review	
13.1	The organization is required to hold management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	Documented procedure has defined management review will be conducted once a year Last conducted in March 2019.
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	Management review meeting carried out in March 2019 (combine RSPO SC, MSPO SCCS and ISCC) Internal audit – 1 NCR closed Customer feedback – data analysis show result from customer survey (i.e. RSPO-CSPO related to meeting the contract volume, timely delivery, dispatch documentation) result achieved. Previous meeting – was highlighted Changes Recommendation for improvement – improve the established system
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	Recommendation for improvement Recourse sufficient.

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

	Module D – CPO Mills: Identity Preserved – Not Applicable				
	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; 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.	Terusan POM Organizational, management systems and the operational systems, 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. b) Mill Manager have overall responsible and authority over the implementation of RSPO supply chain requirement in RSPO Terusan POM. Sighted appointment letter dated in Jan 2019. Interview with sustainability committee member, mill manager, assistant mill manager & weighbridge operator was confirmed they are understood the supply chain requirements.			

E.3.2	The site shall have documented procedures for receiving and processing certified and non-certified FFBs. Procedure available.		
E.4	Purchasing and goods in		
E.4.1	The site shall verify and document the volumes of certified and non-certified FFBs received.	Checked and verified.	
E.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	There was no overproduction of certified FFBs during the period under review.	
E.5	Record keeping		
E.5.1	 a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and/or three-monthly basis. 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.) For further details refer to Module C. 	 a) TPOM had continued to keep record and balances of all receipts of RSPO-certified FFBs and deliveries of RSPO-certified CPO and PK on a three-monthly basis in the table 'Quarterly Report/Fixed Inventory Period 2019'. b) Volume monitored and recorded. c) Quarterly Report/Fixed Inventory Period 2019'-KPOM indicated both positive balances for the certified CPO and palm kernel. A total of 48 randomly selected FFB delivery notes/dispatch tickets for RSPO-certified FFBs 	

Annex 2 – Book & Claim (BC) – Not Applicable

Annex 3 – RSPO Rules on Communications and Claims – Not Applicable

Attachment 6

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

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action Taken by the CU and Verification by Auditors
Indicator 1.3.1	Minor	#NCR No: RZ 02 2018 Finding: The Group Code of Ethical Conduct has not been communicated to all levels of the workforce and operations. Objective evidence: At Terusan Palm Oil Mill, the Group Code of Ethical Conduct has not been given to newly-recruited workers	During this 4th surveillance audit, evidence is available that newly recruited workers No: GU/TRP/0419/572 (joined on 19 April 2019), GU/TRP/0219/566 (joined 21 Feb 2019), GU/TRP/0319/568 (joined 14 March 2019) had attended the Post-Arrival Orientation Talk on 1 July 2019 which consist of company's policies and code of ethical conduct. Therefore Minor NCR No RZ 02 2018 has been satisfactorily closed.
Indicator 4.1.2	Minor	#NCR No: RZ 04 2018 Finding: Wilmar Child Labour Policy dated September 2010 was not complied with. Objective evidence: At TPOM - One worker Emp No: GU/TRP/0418/523 was employed before reaching 18 years. His date of birth was 20 April 2000, and his contract of employment was dated 9 April 2018. He attended schedule waste training on 12 April 2018.	A review of the workers' list show that all workers at the POM, Terusan 1, Teursan 2 and Rumudi estates are above 18 years of age. Therefore, Major NCR RZ04 2019 is satisfactorily closed.
Indicator 4.3.4	Major	#NCR No : MAR 01 2018 Finding: No evidence of subsidence of peat soils be minimized and monitored. Objective evidence: It was noticed that based on soil map and soil survey & suitability assessment in Terusan 1 Estate. It was found that 20.35 ha is Klias family consist mainly of partly decomposed organic soil materials (peat). No evidence subsidence of peat soils be minimized and monitored has been conducted.	In previous soil survey reports the Kilas series soil (organic soils) was considered as Peat. However, in order to confirm presence of Peat Soils, an internal soil survey was conducted by EMU Sabah on 19th and 20th of June and soil analysis had been carried out on 29th June 2018. The full report was completed on 7th July 2018. Result from the study revealed the area was not categorized as peat soil. The assessment was conducted on Terusan Estate 1 on 19th and 20th June 2018 in blocks 001, 002, 003, and 004. Whereas, for Terusan 2 the assessment was conducted on 21st June 2018 in block 031, 032, 038, and 039 to reconfirm the soil classification (peat). Result from assessment in Terusan Estate 1 confirmed that1 sampling point was of muck soil, 4 points were organic clay soil whereas, the rest of them were confirmed as mineral soil. In Terusan Estate 2, only 1 point was confirmed as organic clay soil while the rest confirmed as mineral soil. Thus, in conclusion, there was no peat soils in all Terusan CU Estates. Thus previous NCR was satisfactory closed.

Indicator 4.3.5	Minor	#NCR No : MAR 02 2018 Finding: No evidence of drainability assessments conducted prior to replanting to determine the long-term viability of the necessary drainage for oil palm growing.	As verified in Indicator 4.3.4, there were no Peat Soils in all 3 Estates in Terusan CU. As such this indicator is NOT APPLICABLE.
		Objective evidence: No evidence of drainability assessments conducted prior to replanting to determine the long-term viability of the necessary drainage for oil palm growing.	
Indicator 5.6.3	Minor	#NCR No: RAR 01 2018 Finding: Terusan CU is using the RSPO PalmGHG Calculator version 3.0.1 to calculate the GHG emission for the estate and mill. However certain data input used in the calculation was found not available in the reported data. Objective evidence: No data input for 2017 GHG calculation such as peat oxidation data.	The CU had used RSPO Palm GHG version 3.0.1 Calculator as a tool to calculate the GHG emissions. The Terusan CU has used option 2 full version to calculate the data. Sighted report sends to RSPO on 04/07/2019. The input data was verified and all the data was found available and adequate. Therefore, previous NCR RAR 01 2018 was satisfactory closed.
Indicator 6.1.2	Major	#NCR No: RZ 05 2018 Finding: No assessment on the impact of massive replanting was carried out with the participation of affected parties. Objective evidence: No impact assessment was carried out with workers impacted by the massive replanting activities for 2015, 2016, 2017 and 2018 at Terusan 1 and Terusan 2 Estates.	During this 4 th surveillance audit, evidence is available that an impact assessment has been carried out with workers impacted by replanting activities. Evidence of the socialization process was carried out on 16 July 2018 for affected workers of Terusan 1 & 2 Estates. The socialization exercise was held to: - inform workers of the oil palm replanting activities; - explain possible impacts of replanting (positive and negative) - get feedback from workers on oil palm replanting The discussion covered possible impacts such as workers' earning, change of job type, increased use of hazardous chemicals, safety and health workers exposure of residential areas to strong winds. Therefore, Major NCR No RZ 05 2018 has been satisfactorily closed.
Indicator 6.2.3	Minor	#NCR No: RZ 01 2018 Finding: At Terusan Palm Oil Mill, records of correspondences with stakeholders were not maintained. Objective evidence: Letters from the Mill dated 24 October 2017 and 30 October 2017 were responding to written requests from HUMANA and Tabika KEMAS, respectively. However, the correspondences from HUMANA and Tabika KEMAS referred to in the letters were not maintained at the Mill	During the 4 th surveillance audit, it was found that the Mill has maintained the letters from HUMANA (dated 30 October 2017) and from Tabika KEMAS (dated 24 October 2017) in the file. Illt was verified that these letters were kept together with the Mill's written responses. Therefore, the Minor NCR RZ 01 2018 has been satisfactorily closed.

Indicator	Minor	#NCR No : RZ 03 2018	
6.5.3		Finding:	It was verified during the 4 th surveillance audit that:
		1. The area surrounding the workers' housing is not kept clear of	Housing and building inspections at the Mill were carried out on a
		undergrowth and maintained in a clean and sanitary	weekly basis (1 st , 2 nd , 3 rd , 4 th weeks of May 2019, June 2019 and July
		condition. This is not in compliance with Section 23(1) (a) of	2019) which complies with the requirements of Section 23 (2)
		the Workers' Minimum Standard of Housing Act 1990.	Workers' Minimum Standard of Housing and Amenities Act 1990.
		All buildings used for the housing of workers, nurseries or	Inspections of the creche and HUMANA are also being carried out on
		community halls are not visited and inspected weekly by an	a weekly basis, i.e. the Terusan 1 creche and HUMANA were
		estate hospital assistant as is required under Section 23 (2) of	inspected on 8 June 2019, 13 June 2019, 20 June 2019, 27 June
		the Workers' Minimum Standard of Housing Act 1990.	2019 conducted by the Hospital Assistant. Similarly, at Terusan 2
		Objective evidence:	Estate, housing inspections and facilities such as creche and
		At the wooden housing of Terusan Palm Oil Mill, there were	HUMANA 8 June 2019, 13 June 2019, 20 June 2019, 26 June 2019
		undergrowth and water collecting under a decommissioned	and 4 July 2019.
		house.	Housing inspection at Rumidi Estate were also carried out on a
		At the wooden housing at Terusan 1 Estate, the main drain is	weekly basis i.e. 8 June 2019, 13 June 2019, 27 June 2019, 4 July
		blocked and stagnant. 3. Housing inspections were carried out as follows:	2019.
			There is no undergrowth at the Mill old housing and the area is reasonably maintained in a sanitary condition.
		o Terusan 1: 6 January 2018, 5 February 2018, 10 March 2018, 28 April 2018 (creche);	At the Terusan 1 housing (wooden block), the drains are clear and
		o Terusan 2: 15 January 2018, 12 February 2018	free-flowing, not blocked with debris and had no unpleasant smell.
		(creche), 12 March 2018, 21 April 2018 (HUMANA),	Therefore, NCR RZ03 2018 is satisfactorily closed.
		7 May 2018	Therefore, NON NEGO 2010 to Salistacionily closed.
		o Terusan Mill: 9 December 2017, 24 January 2018,	
		24 February 2018, 14 April 2018.	

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

Time Bound Plan for Wilmar International Limited (Indonesia-Kalimantan)

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	West Kalimantan	2012	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)	West Kalimantan	2017	Re-Audit

Time Bound Plan for Wilmar International Limited (Indonesia-Sumatera)

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

	6 PHP (blok 22)	PT Gersindo Minang Plantation Mill		West Sumatera	2020	To be certified	
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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