



**SIRIM QAS INTERNATIONAL SDN. BHD.**  
Building 4, SIRIM Complex, No. 1, Persiaran Dato' Menteri,  
Section 2, 40700 Shah Alam, Selangor, Malaysia.

File Ref. : EI03590001

**RSPO PUBLIC SUMMARY REPORT**

**CLIENT : IOI CORPORATION BHD. – BUKIT LEELAU CERTIFICATION UNIT**

**PARENT COMPANY : IOI CORPORATION BERHAD**

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

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

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

**MAP :** See Attachment 1

**AUDIT DATE :** 28 – 30 Sep. & 01 – 02 Oct. 2020

**DURATION :** 23 auditor days

**TYPE OF AUDIT :**

Annual Surveillance Audit No.  
1/2/3/4

Recertification Audit

**STANDARD:** MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

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

**VALIDITY OF RSPO CERTIFICATE :** 19/11/2015 to 18/11/2020

(extended to 18/02/2021; provided under the provision in addressing the Covid-19 pandemic condition)

**The following attachments form part of this report:**

Non-conformity Report(s)

List of additional site(s)

**Report by Audit Team Leader**

**Acknowledgement by Client's Representative**

Name : DZULFIQAR BIN AZMI

Name : RAVI TONY

Signature :

Signature :

Date : 13/01/2021

Date :

16/1/2021

## RSPO PUBLIC SUMMARY REPORT

### SUMMARY OF AUDITS

<b>Annual Surveillance Audit 4</b>			
On-site audit date	: 26 to 30/08/2019 & 28/11/2019	No. of auditor days:	21
Audit team	: Selvasingam T Kandiah (TLA), Mohd Zulfakar bin Kamaruzaman (A), Rahayu binti Zulkifli (A), Dzulfiqar bin Azmi (A) & Suzalina binti Kamaralarifin (A),		
No. of major NCR	: 4	Indicator: 4.1.2 (Recurrent Minor), 5.1.1, 6.12.3 & D.4.2 (Supply Chain)	Closing date: 29/11/2019
No. of minor NCR	: 0	Indicator: -	
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees / Workers organizations	Settlers	Villagers / Local communities
	/	/	/
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
	/	/	/
Indigenous people	Contractors	Others (Please specify)	
	/	/	Mill Canteen Operator
Supply base sampled	: Bukit Leelau Estate, Detas Estate, Laukin A Estate, Leepang A Estate		
Changes since the last audit	: It has been noted that there were changes in the personnel holding management positions of the company in Aug 2019 i.e. Plantation Controller retired, Estates Manager replacement.		
Justification of audit planning	: Total allocation of auditor days for Bukit Leelau CU were: 21.0 auditor days Mill = 5 days (4 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems). Estates = 4 days each for the four estates (Bukit Leelau, Detas, Laukin A & Leepang A) for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title.		
Report approved by	: Kamini Sooriamoorthy	Approval date : 05/12/2019	

<b>Recertification Audit</b>			
On-site audit date	: 28 – 30/09/2020 & 01 – 02/10/2020	No. of auditor days:	23 Auditor Days
Audit team	: Dzulfiqar Azmi (LA), Mohd Ab Raouf Asis, Mohd Zulfakar Kamaruzaman, Rozaimiee Ab Rahman, Selvasingam T Kandiah.		
No. of major NCR	: 2	Indicator: 4.1.1, 6.7.3	Closing date: 18/12/2020
No. of minor NCR	: Nil	Indicator: Nil	
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees / Workers organizations	Settlers	Villagers / Local communities
	/	/	/
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
	/	/	/
Indigenous people	Contractors	Others (Please specify)	
	/	/	
Supply base sampled	: Merchong Estate, Mekassar Estate, Laukin A Estate, Leepang A Estate.		
Changes since the last audit	: Yes, changes of Planted Areas (Ha) and HCV Areas / Conservation Areas (Ha). The details in the “RSPO SUMMARY OF INFORMATION” refer Table 1 and Section 3.1 of the report.		
Justification of audit planning	: Total allocation of auditor days for Bukit Leelau CU were: 23.0 auditor days Mill = 3 days (2 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems). Estates = 20 days each for the four estates for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title.		
Report approved by	: Kamini M. Sooriamoorthy	Approval date: 13/01/2021	

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**SUMMARY OF INFORMATION**

**TABLE 1**

	<b>RA</b>	<b>ASA 1</b>	<b>ASA 2</b>	<b>ASA 3</b>	<b>ASA 4</b>
<b>Projection Period</b>	<b>September 2020 – August 2021</b>				September 2019 – August 2020
<b>Certified FFB Processed (MT)</b>	232,240.00				237,320.00
<b>Production of Certified CPO (MT)</b>	54,810.43				56,005.35
<b>Production of Certified PK (MT)</b>	10,563.59				10,796.61
<b>Certified Areas (Ha)</b>	11,489.17				11,489.17
<b>Planted Areas (Ha)</b>	*9,726.00				9,880.00
<b>Production Areas (Ha)</b>	9,247.00				8,343.00
<b>HCV Areas / Conservation Areas (Ha)</b>	**29.43				22.66
<b>REMARKS</b>	*Changes of planted ha - Total reduction of 154 Ha of total planted area due to remapping by the GIS department. **Increase in HCV / Conservation area by 6.77 Ha due to GIS adjustment and mapping.				

**TABLE 2**

	<b>PO</b>	<b>PK</b>
<b>Last years certified volume (MT)</b>	*58,028.21	*10,875.32
<b>Last years actual certified sold (MT)</b>	53,455.43	9,349.40
<b>Last years actual sold under other schemes (MT)</b>	0.00	0.00
<b>Last years sold conventional (MT)</b>	394.48	195.90
<b>New year certified volume (MT)</b>	54,810.43	10,563.59

\*Extension of volume for CSPO (2,022.86 MT) and CSPK (78.71 MT) as approved by RSPO.

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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**

<b>Member of the Audit Team</b>	<b>Role/area of RSPO requirements</b>	<b>Qualifications</b>
Dzulfiqar Azmi	Lead Auditor / Safety & Environment	Holds a B. Sc. in Agriculture from University Teknologi Malaysia (UiTM). He had more than 5 years of working experience in the oil palm operation. He has experience in auditing since 2018. He is trained as an RSPO Lead Auditor.
Mohd. Zulfakar Kamaruzaman	Auditor / Supply Chain, Social & HCV	Holds a B.Sc. Forestry. He had several years of working experience in the oil palm operation. He is a qualified RSPO P&C and RSPO Supply Chain Lead Auditor.
Rozaimée Ab. Rahman	Auditor Environment, TPB, GHG	Holds a B. Sc. of Agriculture from UPM. He had 7 years of working experience in the oil palm operation. He is a qualified Lead Auditor for RSPO P&C and MSPO.
Mohd Ab Raouf Asis	Auditor Social	Obtained qualification in B.Sc. (Hons) Management Technology Majoring Production and Operation from UTHM in 2007. He has been in the plantation industry for 7 years assisting Estate Manager managing palm oil estates. He has been trained as RSPO as well as MSPO auditor.
Selvasingam T Kandiah	Auditor / GAP	Holds a B.Sc. (Hons) of Agriculture University of Agricultural Sciences, Hebbal, Bangalore, India. He had more than 29 years of working experience in plantation management covering cocoa, rubber and oil palm. He is a qualified RSPO P & C and MSPO Lead Auditor.

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### 1.3 Audit methodology

The audit covered the Bukit Leelau palm oil mill and 4 (no. of supply base) of its supply base.. The Bukit Leelau POM supply base covered during the audit are Merchong Estate, Mekassar Estate, Laukin A Estate and Leepang A Estate. The audit included an on-site audit to the estates, mill and settlers' houses 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

SIRIM QAS International had initiated the stakeholder consultation by announcing the invitation in the RSPO and SIRIM QAS International's websites in 27th August 2020. In addition, SIRIM QAS International had also sent invitations through letters to the relevant stakeholders, including government agencies and Non-Governmental Organisations (NGOs).

In summary, the stakeholders interviewed during the audit and the evidence from the stakeholder consultation carried out were as tabulated below:

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

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	<p>countries.</p> <ul style="list-style-type: none"> <li>▪ All migrant workers keep their own passports.</li> <li>▪ The following were the workers interviewed during audit at Bukit Leelau CU:</li> </ul>
2) Settlers	Not applicable.
3) Villagers / Local communities (including women representatives, displaced communities)	<ul style="list-style-type: none"> <li>▪ Interviewed local communities representative. They are actually Orang Asli community who have been offered settlement.</li> <li>▪ No land dispute. Many villagers are now oil palm smallholders.</li> </ul>
4) Suppliers	<ul style="list-style-type: none"> <li>▪ Supplier of hardware since 1997.</li> <li>▪ Fair dealings with the units in Bkt Leelau CU.</li> <li>▪ Payments are made within 1 months of invoice.</li> </ul>
5) Contract workers	Not available.
6) Local & national NGOs	Global Environment Centre – positive comments were sighted.
7) Government agencies / Statutory bodies	All the comments by both government agencies – Suruhanjaya Tenaga & Suruhanjaya Perkhidmatan Air Negara, have been verified and rectified, the details of the comments have been summarized under indicator 2.1.1 in the Attachment 3.
8) Independent growers / Smallholders	No issues so far.
9) Indigenous people	Interviewed local communities. So far, no issue has been highlighted.
10) Contractor	<p>Interviewed with contractors and suppliers</p> <ul style="list-style-type: none"> <li>▪ Fair dealings with the units in Bkt Leelau CU.</li> <li>▪ Payments are made within 1 months of invoice.</li> <li>▪ The estate mandore and staff will verify the work he has done before his invoice can be approved for payment.</li> <li>▪ Has attended RSPO training and safety briefing. The Company provides PPE (vest, goggles, straw hat).</li> </ul>
11) Previous land owner (if any)	Not available.
12) Others (please specify)	No issues so far.

1.5 Audit plan : Refer to Attachment 2

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

## 2.0 SCOPE OF CERTIFICATION AUDIT

### 2.1 Description of the certification unit

The Bukit Leelau Certification Unit is one of the business unit under the IOI Corporation Berhad. The CU consists of Bukit Leelau Oil Mill, Bukit Leelau Estate, Detas Estate, Merchong Estate, Mekassar Estate, Leepang A Estate and Laukin A Estate. Bukit Leelau Oil Mill, Bukit Leelau Estate, Detas Estate, Mekassar Estate, Leepang A Estate and Laukin A Estate are the subsidiaries of Perusahaan Mekassar (M) Sdn.Bhd. while Merchong Estate is the subsidiary of Syarikat Pukin Ladang Kelapa Sawit Sdn.Bhd. Both Syarikat Pukin Ladang Kelapa Sawit Sdn. Bhd. and Perusahaan Mekassar (M) Sdn. Bhd. are the subsidiaries of IOI Corporation Berhad. The registration of RSPO Supply Chain in the RSPO PalmTrace for traceability of sustainable crude palm oil is under the name of Perusahaan Mekassar (M) Sdn. Bhd. The Bukit Leelau Oil Mill has a processing capacity of 40 metric tonnes of fresh fruit bunches (FFB) per hour. Bukit Leelau CU all estates have been fully developed before the year of 2005.

Bukit Leelau CU did not hold any other management system certification except MSPO and RSPO.

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

The FFB is sourced from company owned estates in the Bukit Leelau CU, IOI Sister Estates and Certified Outsider Estates. The details of the FFB actual and projected contribution from each source to the mill are shown in the following tables:

**Table 1: Actual FFB production by the supply base for the last reporting period  
(September 2019 to August 2020)**

CU Own Estates	FFB Production	
	Volume (MT)	Percentage (%)
Bukit Leelau Estate	23,812.78	10.08
Detas Estate	56,782.46	24.04
Merchong Estate	28,958.07	12.26
Mekassar Estate	50,538.75	21.39
Leepang A Estate	47,098.69	19.94
Laukin A Estate	26,377.21	11.17
IOI Sister Estates	Volume (MT)	Percentage (%)
Shahzan 1 Estate	166.14	0.07
Shahzan 2 Estate	943.53	0.40
Pukin Estate	672.43	0.28
Certified Outsider Crop	Volume (MT)	Percentage (%)
Bebar Estate	486.01	0.21
Sungai Jernih Estate	400.56	0.17
<b>Total</b>	<b>236,236.63</b>	<b>100.00</b>



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**Table 2: Projected FFB production by supply base for the next reporting period  
(September 2020 to August 2021)**

CU Own Estates	FFB Contribution	
	Volume (MT)	Percentage (%)
Bukit Leelau Estate	19,780.00	8.52
Detas Estate	54,330.00	23.39
Merchong Estate	54,420.00	14.18
Mekassar Estate	32,930.00	23.43
Leepang A Estate	49,270.00	21.22
Laukin A Estate	21,510.00	9.26
<b>Total</b>	<b>232,240.00</b>	<b>100.00</b>

**Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period  
(September 2019 to August 2020)**

RSPO Supply Chain Model: Identity Preserved	Total (MT)
FFB Received	236,236.63
FFB Processed	236,236.63
CPO Production	57,066.34
PK Production	10,439.13
CPO delivered as RSPO certified	53,455.43
CPO delivered under other schemes (MT)	0.00
CPO delivered as non-RSPO certified	394.48
PK delivered as RSPO certified	9,349.40
PK delivered under other schemes (MT)	0.00
PK delivered as non-RSPO certified	195.90
Credits traded through Books and Claim	0.00

**Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period  
(September 2020 to August 2021)**

RSPO Supply Chain Model: Identity Preserved	Total (MT)
FFB Received	232,240.00
FFB Processed	232,240.00
Certified FFB	232,240.00
CPO Production	54,810.43
PK Production	10,563.59

**Table 5 Planted and certified area of the CU**

Estate	Planted (ha)	Certified (ha)
Bukit Leelau Estate	1,946.00	2,096.00
Detas Estate	2,121.00	2,225.78
Merchong Estate	1,797.00	1,934.40
Mekassar Estate	1,126.00	1,209.39
Leepang A Estate	1,829.00	2,403.70
Laukin A Estate	907.00	1,619.90
<b>Total</b>	<b>9,726.00</b>	<b>11,489.17</b>

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**Table 6 Planting profile for Bukit Leelau CU**

<u>Estate</u>	<u>Year of planting</u>	<u>Planting Cycle</u>	<u>Mature &gt;3 years (Ha)</u>	<u>Immature &lt; 3 years (Ha)</u>	<u>Planted area</u>	<u>% of planted area mature</u>	<u>% of planted area immature</u>
Bukit Leelau	1998	1st	95.00	-	95.00	4.88	-
	2014	2nd	239.00	-	239.00	12.28	-
	2015	2nd	302.00	-	302.00	15.52	-
	2016	2nd	404.00	-	404.00	20.76	-
	2017	2nd	430.00	-	430.00	22.10	-
	2018	2nd	-	476.00	476.00	-	24.46
	<b>Total</b>		<b>1470.00</b>	<b>476.00</b>	<b>1946.00</b>	<b>75.54</b>	<b>24.46</b>
Detas	2009	2nd	100.00	-	100.00	4.71	-
	2010	2nd	172.00	-	172.00	8.11	-
	2011	2nd	350.00	-	350.00	16.50	-
	2012	2nd	155.00	-	155.00	7.31	-
	2013	2nd	244.00	-	244.00	11.50	-
	2014	2nd	466.00	-	466.00	21.97	-
	2015	2nd	359.00	-	359.00	16.93	-
	2016	2nd	272.00	-	272.00	12.82	-
2018	2nd	-	3.00	3.00	-	0.14	
	<b>Total</b>		<b>2118.00</b>	<b>3.00</b>	<b>2121.00</b>	<b>99.86</b>	<b>0.14</b>
Merchong	2003	2nd	191.00	-	191.00	10.63	-
	2004	2nd	291.00	-	291.00	16.19	-
	2005	2nd	139.00	-	139.00	7.74	-
	2006	2nd	367.00	-	367.00	20.42	-
	2007	2nd	264.00	-	264.00	14.69	-
	2008	2nd	145.00	-	145.00	8.07	-
2010	2nd	400.00	-	400.00	22.26	-	
	<b>Total</b>		<b>1797.00</b>	<b>0.00</b>	<b>1797.00</b>	<b>100.00</b>	<b>0.00</b>
Mekassar	2004	2nd	263.00	-	263.00	23.36	-
	2005	2nd	284.00	-	284.00	25.22	-
	2006	2nd	198.00	-	198.00	17.58	-
	2008	2nd	101.00	-	101.00	8.97	-
	2009	2nd	280.00	-	280.00	24.87	-
	<b>Total</b>		<b>1126.00</b>	<b>0.00</b>	<b>1126.00</b>	<b>100.00</b>	<b>0.00</b>
Leepang A	2001	1st	430.00	-	430.00	23.51	-
	2002	1st	1399.00	-	1399.00	76.49	-
	<b>Total</b>		<b>1829.00</b>	<b>0.00</b>	<b>1829.00</b>	<b>100.00</b>	<b>100.00</b>
Laukin A	2002	1st	907.00	-	907.00	100.00	-
	<b>Total</b>		<b>907.00</b>	<b>0.00</b>	<b>907.00</b>	<b>100.00</b>	<b>0.00</b>
<b>Sub Total</b>			<b>9247.00</b>	<b>479.00</b>	<b>9726.00</b>	<b>96.10</b>	<b>3.90</b>

**2.3 Organizational Information/Contact Person(s)**

The details of the contact person is as shown below:

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

### 3.0 AUDIT FINDINGS

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

Changes of planted ha - Total reduction of 154 Ha of total planted area:

- Increase 1 Ha in Detas Estate due to updating the replanting area PR18A which took over the balance of nursery area and the boundary of neighboring block PR16H (currently PR16A) has been realigned by reducing the size of estate roads.
- 144 Ha reduced in Laukin A Estate due to remapping by the GIS department after updating the vacant area due to flood.
- 9 Ha reduced in Merchong Estate due to remapping by the GIS department after realigning boundary for housing and steep areas.
- 2 Ha reduced in Mekassar Estate due to remapping by the GIS department after adding in river area.

#### 3.2 Progress and changes in time bound plan (Refer to Attachment 6 for the time bound plan)

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

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

IOI Corporation Berhad is in progress to certify 5 CU's from 2020 to 2021 as verified through  
Time Bound Plan dated July 2020.

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

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

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

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

If no, please state reasons \_\_\_\_\_

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

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

No changes so far.

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

\* If not closed, minor non conformity will be upgraded to major non conformity

#### 3.5. Complaint received from stakeholder (if any)

Yes, comments from:

- 1) Suruhanjaya Tenaga (Negeri Pahang) regarding "Electricity Regulations 1994".
- 2) Suruhanjaya Perkhidmatan Air Negara (SPAN) regarding "Akta Industri Perkhidmatan Air Negara (Akta 655) (2006)."

All the comments by both government agencies have been verified and rectified, the details of the comments have been summarized under indicator 2.1.1 in the Attachment 3.

**RSPO PUBLIC SUMMARY REPORT**

**4.0 DETAILS OF NON-CONFORMITY REPORT**

4.1 For P&C (Details checklist refer to Attachment 3) :

Total no. of minor NCR(s) (details refer to Attachment 4 )	List :	Nil
Total no. of major NCR(s) (details refer to Attachment 4 )	List :	4.1.1, 6.7.3

4.2 For SC (Details checklist refer to Attachment 3) :

Total no. of minor NCR(s) (details refer to Attachment 4 )	List :	Nil
Total no. of major NCR(s) (details refer to Attachment 4 )	List :	Nil

**5.0 AUDIT CONCLUSION**

The audit team concludes that the organization has established and maintained its management system in line with the RSPO P&C requirements of the standard and demonstrated the ability of the system to systematically achieve agreed criterion & requirements.

**6.0 RECOMMENDATION**

- No NCR recorded. Recommended to continue certification.
- Minor NCR(s) recorded. Corrective action plan has been accepted. Verification of the NCR(s) to be carried out in the next audit.  
*Note: Minor NCRs raised in the audit which are not addressed in the subsequent audit shall be upgraded to major NCRs.*
- Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided and accepted by the audit team. The NCR(s) have been satisfactorily closed out.
- Recommended to continue certification.
- Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s)..... have not been satisfactorily closed out within 60 days of the audit. Recommended for suspension of the certificate.  
*Note: Major NCRs which are not addressed within a further 60 days shall result in the certificate being withdrawn.*

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

Audit Team Leader :

DZULFIQAR AZMI

(Name)



(Signature)

18/12/2020

(Date)



**RSPO RECERTIFICATION AUDIT PLAN  
IOI CORPORATION BERHAD  
BUKIT LEELAU CERTIFICATION UNIT**

**1. Objectives**

The objectives of the audit are as follows:

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

**2. Date of assessment** : 28 – 30 September 2020 & 01 – 02 October 2020

**3. Site of assessment** : Bukit Leelau CU:  
1) Bukit Leelau POM  
2) Merchong Estate  
3) Mekassar Estate  
4) Leepang A Estate  
5) Laukin A Estate

**4. Reference Standard :**

- a. MYNI 2019 for RSPO P&C 2018
- b. RSPO Certifications Systems for P&C, June 2017
- c. RSPO Supply Chain System, June 2017
- d. Company's audit criteria including Company's Manual / Procedures

**5. Assessment Team:**

Lead Auditor : Dzulfiqar Azmi (Safety, Environment (Mill), GHG)  
Auditor : Mohd Ab Raouf Asis (Social)  
Rozaimée Ab Rahman (Environment (Estate), TPB, Supply Chain)  
Mohd Zulfakar Kamaruzaman (Social, HCV)  
Selvasingam T Kandiah (GAP)

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

**6. 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.

**7. 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.

**8. 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.

**9. Working Language** : English and Bahasa Malaysia

**11. 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.

**12. Facilities Required**

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

**13. Assessment Programme Details** : As below.

## RSPO PUBLIC SUMMARY REPORT

### Day One: 28/09/2020 (Monday)

Time	Activities / areas to be visited			Auditee
9.00 am	Opening Meeting at <b>Bukit Leelau POM</b> – Audit team introduction and briefing on assessment objectives, scope, methodology, criteria and programmes by SIRIM QAS Audit Team Leader.			All CU
9.20 am	Briefing on the organization background and implementation of RSPO at CU (including actions taken to address previous audit findings) by company Management Representative. Logistics discussion to the sites to be visited.			Management Representative
9.30 am	Logistics discussion to the sites to be visited at <b>Bukit Leelau POM</b> .			Management Representative
9.45 am	To assign each audit team members – site and the P&C requirements			
	<b>Dzul Bukit Leelau POM</b>	<b>Raouf Bukit Leelau POM</b>	<b>Rozaimée Bukit Leelau POM</b>	
	<b>Coverage of assessment: P1, P2, P3, P6, P7:</b> <ul style="list-style-type: none"> <li>▪ Follow up from previous assessment findings.</li> <li>▪ Laws and regulations</li> <li>▪ Waste management including disposal site</li> <li>▪ Aspects/impacts of mill management</li> <li>▪ Safety &amp; Health practice – witness activities at site</li> <li>▪ Hazard identification and Risk Management</li> <li>▪ Chemical management</li> <li>▪ Chemical/ fertilizer store, workshop</li> <li>▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area &amp; etc)</li> <li>▪ Controlled/open burning</li> <li>▪ Pollution mitigating plans</li> <li>▪ River system and Water bodies</li> <li>▪ Management and disposal of waste including pesticides containers</li> <li>▪ Training and skill development programs</li> <li>▪ Mill Best Practice</li> <li>▪ Continuous improvement</li> </ul> Other area identified during the assessment	<b>Coverage of assessment: P1, P2, P4, P5, P7:</b> <ul style="list-style-type: none"> <li>▪ Follow up from previous assessment findings</li> <li>▪ Laws and regulations</li> <li>▪ Consultation with relevant government agencies</li> <li>▪ Local communities and stakeholders</li> <li>▪ Local sustainable development</li> <li>▪ Support smallholder inclusion</li> <li>▪ Workers Issues</li> <li>▪ Line site inspection</li> <li>▪ Discussion with relevant management (CSR, community affairs) and view documentation such as EIA, SIA, assessment and management plans.</li> <li>▪ Land titles user rights</li> <li>▪ Interview with Union representatives</li> <li>▪ Interview with gender committee, worker representative, contractors, supplier, etc</li> <li>▪ Workers Issues</li> <li>▪ Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, provision shop &amp; etc)</li> <li>▪ Continuous improvement</li> </ul> Other area identified during the assessment	<b>Site visit and assessment on Supply Chain Implementation including the:</b> <ul style="list-style-type: none"> <li>▪ Model used</li> <li>▪ General Chain of Custody</li> <li>▪ System Requirements for the supply chain</li> <li>▪ Documented procedures</li> <li>▪ Purchasing and goods in</li> <li>▪ Outsourcing activity</li> <li>▪ Sales and goods out</li> <li>▪ Processing</li> <li>▪ Records keeping</li> <li>▪ Registration</li> <li>▪ Training</li> <li>▪ Claims</li> </ul>	
1.00 pm	<b>LUNCH BREAK &amp; ZUHUR PRAYER</b>			
2.00 pm	Overview of current activities at CU & Continue assessment at <b>Bukit Leelau POM</b> .			
5.00 pm	Audit team discussion / End of Day 1 audit			

### Day Two: 29/09/2020 (Tuesday)

Time	Activities / areas to be visited	Auditee
9.00 am	Logistics discussion to the sites to be visited at <b>Merchong Estate</b> .	Management Representative



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9.30 am	To assign each audit team members – site and the P&C requirements				
	<b>Dzul Merchong Estate</b>	<b>Raouf Merchong Estate</b>	<b>Rozaimée Merchong Estate</b>	<b>Zulfakar Merchong Estate</b>	<b>Selva Merchong Estate</b>
	<b>Coverage of assessment: P1, P2, P3, P6, P7:</b> <ul style="list-style-type: none"> <li>▪ Follow up from previous assessment findings.</li> <li>▪ Laws and regulations</li> <li>▪ Safety &amp; Health practice – witness activities at site</li> <li>▪ Hazard identification and Risk Management</li> <li>▪ Chemical management</li> <li>▪ Chemical/ fertilizer store, workshop</li> <li>▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area &amp; etc)</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>	<b>Coverage of assessment: P1, P2, P4, P5, P7:</b> <ul style="list-style-type: none"> <li>▪ Follow up from previous assessment findings</li> <li>▪ Laws and regulations</li> <li>▪ Discussion with relevant management (CSR, community affairs) and view documentation such as EIA, SIA, assessment and management plans.</li> <li>▪ Interview with Union representatives</li> <li>▪ Interview with gender committee, worker representative, contractors, supplier, etc</li> <li>▪ Workers Issues</li> <li>▪ Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, provision shop &amp; etc)</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>	<b>Coverage of assessment: P1, P2, P3, P6, P7:</b> <ul style="list-style-type: none"> <li>▪ Follow up from previous assessment findings.</li> <li>▪ Laws and regulations</li> <li>▪ Waste management including disposal site</li> <li>▪ Aspects/impacts of plantation management</li> <li>▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area &amp; etc)</li> <li>▪ Controlled/open burning</li> <li>▪ Pollution mitigating plans</li> <li>▪ Riparian zone</li> <li>▪ River system and Water bodies</li> <li>▪ Management and disposal of waste including pesticides containers</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>	<b>Coverage of assessment: P1, P2, P3, P6, P7:</b> <ul style="list-style-type: none"> <li>▪ Follow up from previous assessment findings</li> <li>▪ Laws and regulations</li> <li>▪ Consultation with relevant government agencies</li> <li>▪ Local communities and stakeholders</li> <li>▪ Local sustainable development</li> <li>▪ Support smallholder inclusion</li> <li>▪ Complaints and grievances</li> <li>▪ Inspection of protected sites with HCV attributes</li> <li>▪ Forested area</li> <li>▪ Plantation Boundary, adjacent and neighbouring land use</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>	<b>Coverage of assessment: P1, P2, P3, P7:</b> <ul style="list-style-type: none"> <li>▪ Follow up from previous assessment findings.</li> <li>▪ Commitment to long-term economic and financial viability</li> <li>▪ Good Agricultural Practice-witness activities at site (weeding/ spraying, etc)</li> <li>▪ EFB mulching, POME application</li> <li>▪ Nursery (if any)</li> <li>▪ Plantation on hilly/swampy area</li> <li>▪ IPM implementation, training and safe use of agro-chemicals.</li> <li>▪ Training and skill development programs</li> <li>▪ New planting</li> <li>▪ Controlled/open burning</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>
1.00 pm	<b>LUNCH BREAK &amp; ZUHUR PRAYER</b>				
2.00 pm	Overview of current activities at CU & Continue assessment at <b>Merchong Estate</b> .				
5.00 pm	Audit team discussion / End of Day 2 audit				

### Day Three: 30/09/2020 (Wednesday)

Time	Activities / areas to be visited	Auditee
9.00 am	Logistics discussion to the sites to be visited at <b>Mekassar Estate</b> .	Management Representative
9.30 am	To assign each audit team members – site and the P&C requirements	
	<b>Dzul Mekassar Estate</b>	<b>Selva Mekassar Estate</b>
	<b>Raouf Mekassar Estate</b>	<b>Zulfakar Mekassar Estate</b>
	<b>Rozaimée Mekassar Estate</b>	<b>Selva Mekassar Estate</b>

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	<p><b>Coverage of assessment: P1, P2, P3, P6, P7:</b></p> <ul style="list-style-type: none"> <li>▪ Follow up from previous assessment findings.</li> <li>▪ Laws and regulations</li> <li>▪ Safety &amp; Health practice – witness activities at site</li> <li>▪ Hazard identification and Risk Management</li> <li>▪ Chemical management</li> <li>▪ Chemical/ fertilizer store, workshop</li> <li>▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area &amp; etc)</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>	<p><b>Coverage of assessment: P1, P2, P4, P5, P7:</b></p> <ul style="list-style-type: none"> <li>▪ Follow up from previous assessment findings</li> <li>▪ Laws and regulations</li> <li>▪ Discussion with relevant management (CSR, community affairs) and view documentation such as EIA, SIA, assessment and management plans.</li> <li>▪ Interview with Union representatives</li> <li>▪ Interview with gender committee, worker representative, contractors, supplier, etc</li> <li>▪ Workers Issues</li> <li>▪ Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, provision shop &amp; etc)</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>	<p><b>Coverage of assessment: P1, P2, P3, P6, P7:</b></p> <ul style="list-style-type: none"> <li>▪ Follow up from previous assessment findings.</li> <li>▪ Laws and regulations</li> <li>▪ Waste management including disposal site</li> <li>▪ Aspects/impacts of plantation management</li> <li>▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area &amp; etc)</li> <li>▪ Controlled/open burning</li> <li>▪ Pollution mitigating plans</li> <li>▪ Riparian zone</li> <li>▪ River system and Water bodies</li> <li>▪ Management and disposal of waste including pesticides containers</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>	<p><b>Coverage of assessment: P1, P2, P3, P6, P7:</b></p> <ul style="list-style-type: none"> <li>▪ Follow up from previous assessment findings</li> <li>▪ Laws and regulations</li> <li>▪ Consultation with relevant government agencies</li> <li>▪ Local communities and stakeholders</li> <li>▪ Local sustainable development</li> <li>▪ Support smallholder inclusion</li> <li>▪ Complaints and grievances</li> <li>▪ Inspection of protected sites with HCV attributes</li> <li>▪ Forested area</li> <li>▪ Plantation Boundary, adjacent and neighbouring land use</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>	<p><b>Coverage of assessment: P1, P2, P3, P7:</b></p> <ul style="list-style-type: none"> <li>▪ Follow up from previous assessment findings.</li> <li>▪ Commitment to long-term economic and financial viability</li> <li>▪ Good Agricultural Practice-witness activities at site (weeding/ spraying, etc)</li> <li>▪ EFB mulching, POME application</li> <li>▪ Nursery (if any)</li> <li>▪ Plantation on hilly/swampy area</li> <li>▪ IPM implementation, training and safe use of agro-chemicals.</li> <li>▪ Training and skill development programs</li> <li>▪ New planting</li> <li>▪ Controlled/open burning</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>
1.00 pm	<b>LUNCH BREAK &amp; ZUHUR PRAYER</b>				
2.00 pm	Overview of current activities at CU & Continue assessment at <b>Mekassar Estate</b> .				
5.00 pm	Audit team discussion / End of Day 3 audit				

### Day Four: 01/10/2020 (Thursday)

Time	Activities / areas to be visited				Auditee
9.00 am	Logistics discussion to the sites to be visited at <b>Laukin A Estate</b> .				Management Representative
9.30 am	To assign each audit team members – site and the P&C requirements				
	<b>Dzul Laukin A Estate</b>	<b>Raouf Laukin A Estate</b>	<b>Rozaimie Laukin A Estate</b>	<b>Zulfakar Laukin A Estate</b>	<b>Selva Laukin A Estate</b>
	<p><b>Coverage of assessment: P1, P2, P3, P6, P7:</b></p> <ul style="list-style-type: none"> <li>▪ Follow up from previous assessment findings.</li> <li>▪ Laws and regulations</li> <li>▪ Safety &amp; Health practice – witness activities at site</li> </ul>	<p><b>Coverage of assessment: P1, P2, P4, P5, P7:</b></p> <ul style="list-style-type: none"> <li>▪ Follow up from previous assessment findings</li> <li>▪ Laws and regulations</li> <li>▪ Discussion with relevant management (CSR, community</li> </ul>	<p><b>Coverage of assessment: P1, P2, P3, P6, P7:</b></p> <ul style="list-style-type: none"> <li>▪ Follow up from previous assessment findings.</li> <li>▪ Laws and regulations</li> <li>▪ Waste management including disposal site</li> </ul>	<p><b>Coverage of assessment: P1, P2, P3, P6, P7:</b></p> <ul style="list-style-type: none"> <li>▪ Follow up from previous assessment findings</li> <li>▪ Laws and regulations</li> <li>▪ Consultation with relevant government agencies</li> </ul>	<p><b>Coverage of assessment: P1, P2, P3, P7:</b></p> <ul style="list-style-type: none"> <li>▪ Follow up from previous assessment findings.</li> <li>▪ Commitment to long-term economic and financial viability</li> <li>▪ Good Agricultural Practice-</li> </ul>

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	<ul style="list-style-type: none"> <li>▪ Hazard identification and Risk Management</li> <li>▪ Chemical management</li> <li>▪ Chemical/ fertilizer store, workshop</li> <li>▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area &amp; etc)</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>	<p>affairs) and view documentation such as EIA, SIA, assessment and management plans.</p> <ul style="list-style-type: none"> <li>▪ Interview with Union representatives</li> <li>▪ Interview with gender committee, worker representative, contractors, supplier, etc</li> <li>▪ Workers Issues</li> <li>▪ Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, provision shop &amp; etc)</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>	<ul style="list-style-type: none"> <li>▪ Aspects/impacts of plantation management</li> <li>▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area &amp; etc)</li> <li>▪ Controlled/open burning</li> <li>▪ Pollution mitigating plans</li> <li>▪ Riparian zone</li> <li>▪ River system and Water bodies</li> <li>▪ Management and disposal of waste including pesticides containers</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>	<ul style="list-style-type: none"> <li>▪ Local communities and stakeholders</li> <li>▪ Local sustainable development</li> <li>▪ Support smallholder inclusion</li> <li>▪ Complaints and grievances</li> <li>▪ Inspection of protected sites with HCV attributes</li> <li>▪ Forested area</li> <li>▪ Plantation Boundary, adjacent and neighbouring land use</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>	<p>witness activities at site (weeding/ spraying, etc)</p> <ul style="list-style-type: none"> <li>▪ EFB mulching, POME application</li> <li>▪ Nursery (if any)</li> <li>▪ Plantation on hilly/swampy area</li> <li>▪ IPM implementation, training and safe use of agro-chemicals.</li> <li>▪ Training and skill development programs</li> <li>▪ New planting</li> <li>▪ Controlled/open burning</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>
1.00 pm	<b>LUNCH BREAK &amp; ZUHUR PRAYER</b>				
2.00 pm	Overview of current activities at CU & Continue assessment at <b>Laukin A Estate</b> .				
5.00 pm	Audit team discussion / End of Day 4 audit				

### Day Five: 02/10/2020 (Friday)

Time	Activities / areas to be visited					Auditee
9.00 am	Logistics discussion to the sites to be visited at <b>Leepang A Estate</b> .					Management Representative
	<b>Dzul Leepang A Estate</b>	<b>Raouf Leepang A Estate</b>	<b>Rozaimie Leepang A Estate</b>	<b>Zulfakar Leepang A Estate</b>	<b>Selva Leepang A Estate</b>	
	<p><b>Coverage of assessment: P1, P2, P3, P6, P7:</b></p> <ul style="list-style-type: none"> <li>▪ Follow up from previous assessment findings.</li> <li>▪ Laws and regulations</li> <li>▪ Safety &amp; Health practice – witness activities at site</li> <li>▪ Hazard identification and Risk Management</li> <li>▪ Chemical management</li> <li>▪ Chemical/ fertilizer store, workshop</li> <li>▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area &amp; etc)</li> </ul>	<p><b>Coverage of assessment: P1, P2, P4, P5, P7:</b></p> <ul style="list-style-type: none"> <li>▪ Follow up from previous assessment findings</li> <li>▪ Laws and regulations</li> <li>▪ Discussion with relevant management (CSR, community affairs) and view documentation such as EIA, SIA, assessment and management plans.</li> <li>▪ Interview with Union representatives</li> <li>▪ Interview with gender committee, worker representative, contractors, supplier, etc</li> </ul>	<p><b>Coverage of assessment: P1, P2, P3, P6, P7:</b></p> <ul style="list-style-type: none"> <li>▪ Follow up from previous assessment findings.</li> <li>▪ Laws and regulations</li> <li>▪ Waste management including disposal site</li> <li>▪ Aspects/impacts of plantation management</li> <li>▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area &amp; etc)</li> <li>▪ Controlled/open burning</li> <li>▪ Pollution mitigating plans</li> <li>▪ Riparian zone</li> </ul>	<p><b>Coverage of assessment: P1, P2, P3, P6, P7:</b></p> <ul style="list-style-type: none"> <li>▪ Follow up from previous assessment findings</li> <li>▪ Laws and regulations</li> <li>▪ Consultation with relevant government agencies</li> <li>▪ Local communities and stakeholders</li> <li>▪ Local sustainable development</li> <li>▪ Support smallholder inclusion</li> <li>▪ Complaints and grievances</li> <li>▪ Inspection of protected sites with HCV attributes</li> <li>▪ Forested area</li> <li>▪ Plantation Boundary, adjacent</li> </ul>	<p><b>Coverage of assessment: P1, P2, P3, P7:</b></p> <ul style="list-style-type: none"> <li>▪ Follow up from previous assessment findings.</li> <li>▪ Commitment to long-term economic and financial viability</li> <li>▪ Good Agricultural Practice-witness activities at site (weeding/ spraying, etc)</li> <li>▪ EFB mulching, POME application</li> <li>▪ Nursery (if any)</li> <li>▪ Plantation on hilly/swampy area</li> <li>▪ IPM implementation, training and safe use of agro-chemicals.</li> <li>▪ Training and skill development</li> </ul>	

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	<ul style="list-style-type: none"> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>	<ul style="list-style-type: none"> <li>▪ Workers Issues</li> <li>▪ Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, provision shop &amp; etc)</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>	<ul style="list-style-type: none"> <li>▪ River system and Water bodies</li> <li>▪ Management and disposal of waste including pesticides containers</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>	<p>and neighbouring land use</p> <ul style="list-style-type: none"> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>	<p>programs</p> <ul style="list-style-type: none"> <li>▪ New planting</li> <li>▪ Controlled/open burning</li> <li>▪ Continuous improvement</li> </ul> <p>Other area identified during the assessment</p>
12:30 pm	<b>LUNCH BREAK &amp; FRIDAY PRAYER</b>				
2.00 pm	Verification on outstanding issues for CU Continue Audit Team discussion and preparation of assessment findings.				
3.00 pm	Discussion and acceptance on assessment findings with Management Representative and visited site Plantation / Scheme Manager				
4.00 pm	Closing meeting at <b>Leepang A Estate</b> / End of audit				

**RSPO PUBLIC SUMMARY REPORT**

**Attachment 3**

**RSPO P&C AUDIT CHECKLIST AND FINDINGS  
(MYNI 2019 FOR RSPO P&C 2018)**

**Principle 1: Behave ethically and transparently**

Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.

Clause	Indicators	Comply Yes/No	Findings
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	YES	Publicly available management documents such as land titles, OHS plans, EIA, SIA, HCV documentation, pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, RSPO Public Summary Report, company policies and continual improvement plans are available and can be cross referred to their respective criterion. All operating units have individual documents and records to demonstrate compliance to this indicator. IOI Group documents are also accessible through their Group's website link: <a href="http://www.ioigroup.com">http://www.ioigroup.com</a> .
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	Information provided in both English and Bahasa Malaysia and accessible to all stakeholders in IOI complex. More information can be access through <a href="https://www.ioigroup.com/Content/S/S_Define">https://www.ioigroup.com/Content/S/S_Define</a>
	1.1.3 (C) Records of requests for information and responses are maintained.	YES	The Bukit Leelau CU have identified personnel responsible for complaints. Records of communication (classified as internal and external) were identified and maintained in different files, depending on the stakeholders. Among the records reviewed were correspondences with the authorities, local communities and employees. The latest communications sighted in these records were the "Borang Aduan" requesting repairs of the employee's houses.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	YES	Consultation and communication procedure is available and documented under SOP 2.0 & 6.0 Appendix 2 Issue 1 Rev 0 Date 17/1/2017 and is applicable to employees, stakeholders, public, etc. Consultation and communication procedure for Bukit Leelau CU is outlined in 'Stakeholder Request Procedure', 'Grievances Reporting Flow Chart' and 'Grievance Procedure For Land Owner Issues'. According to the procedure, any communication from the public will be responded within 5 working days. The Procedures are communicated to all levels of employees via common notice boards at the work places and workers' housing quarters.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.		Stakeholder lists for all the units under Bukit Leelau CU were all available and sighted during the audit. They each comprise relevant government agencies such the Department of Environment, the Labour Office, Department of Wildlife and National Parks, PERKESO, canteen operators, contractors, suppliers, neighbouring estates, nearby villagers, schools, Department of Orang Asli Development (JAKOA), government district clinic.
1.2	1.2.1 A policy for ethical conduct is in		A policy entitled 'Code of Business Conduct & Ethics' dated in May 2015 and revised in

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
The unit of certification commits to ethical conduct in all business operations and transactions.	place and implemented in all business operations and transactions, including recruitment and contracts.		August 2018 is available and verified. This Policy is displayed on notice within the estate and mill premises. Assessment on the level of understanding was carried out at the end of the trainings to ensure effectiveness of these training on the workers.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.		The system in place to monitor compliance and implementation of the Policy and overall business conducts include Audit finance done by internal from HQ Corporate Internal Audit and External by Binder Dijker and Otte Co. Furthermore, Internal audit by Sustainability Team and Safety and Health Team also conducted in frequency of once in a year.

**Principle 2: Operate legally and respect rights**

Implement legal requirements as the basic principles of operation in any jurisdiction.

<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1 (C) The unit of certification complies with applicable legal requirements.	YES	Generally, it was evident that the Bukit Leelau CU has demonstrated its compliances to legal requirements. Among those sampled were the Company's compliance with the Employees' Social Security Act 1969, Employment Act 1955, Minimum Wage (Amendment) Order 2018, Employment Insurance System Act 2017, and Minimum Standard of Workers' Housing and Amenities Act 1990 etc.
	2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	YES	Document titled "Legal Requirement Register" maintained available at Bukit Leelau CU. The document last reviewed on 25/02/2020 by HQ. Changes to the law and regulation are monitored by the Sustainability Team. Various sources were referred in obtaining information updates of legal requirements. This include checking with industrial association (e.g. MPOA, EMPA, SECA, etc.), attending seminar/conference, buying of the law books, government agencies websites, etc.
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	YES	Based on site visit, boundary mark between the estates with private smallholders and neighboring estates are visibly maintained.
2.2 All contractors providing operational	2.2.1 A list of contracted parties is maintained.	YES	A list of contracted parties was maintained in the list of stakeholders updated in Sept 2020. The list of stakeholders was verified in each operating business visited.

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Clause	Indicators	Comply Yes/No	Findings
<p>services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>	<p>2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.</p>	<p>YES</p>	<p>It was evident that agreements with third parties contain clauses on meeting applicable requirements. Evidence of legal due diligence carried out include getting the vendors to comply with rules relating to labour and human rights, company ethics and management practices, and would comply with all laws and regulations relating to anti-bribery, fraud and corruption.</p>
	<p>2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p>	<p>YES</p>	<p>All contracts signed with contractors contain a clause on compliance with employment laws, which would include laws related to employment of children and young persons. Based on records available, interviews conducted and observations made during the audit, there was no evidence of any young persons employed within Bukit Leelau CU.</p>
<p>2.3 All FFB supplies from outside the unit of certification are from legal sources.</p>	<p>2.3.1 (C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>• Information on geo-location of FFB origins.</li> <li>• Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>• One or more supporting documents for claims</li> <li>• Valid MPOB license</li> </ul>	<p>YES</p>	<p>Fresh Fruit Bunches are supplied from IOI Plantation Berhad owned estates which are certified to RSPO (Detas, Bukit Leelau, Merchong, Mekassar, Laukin A and Leepang). Bukit Leelau POM also is an Identity Preserved Mill. All Information on geo-location of FFB origins, Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder, One or more supporting documents for claims, Valid MPOB license, were available.</p>
	<p>2.3.2 For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p>	<p>YES</p>	<p>Fresh Fruit Bunches are supplied from IOI Plantation Berhad owned estates which are certified to RSPO (Detas, Bukit Leelau, Merchong, Mekassar, Laukin A and Leepang). Bukit Leelau POM also is an Identity Preserved Mill. Thus, there is no indirectly Sourced FFB used.</p>

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### **Principle 3: Optimise productivity, efficiency, positive impacts and resilience**

Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.	3.1.1 (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	YES	As per all IOI Corporation Berhad, Bukit Leelau CU continued to have documented business plans with projections until the financial year 2025/2026. At the estates, the budget provisions covered activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO compliance, etc. Attention was given to crop projection, cost of production, cost per ton and per hectare indicators to monitor the performance of each operating unit. The cost of production was reviewed and compared against expenditure each year with projections in place for future years.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	Bukit Leelau CU had a Long Range Replanting Program up to 2029/2030. The program was reviewed annually. The oldest plantings were as follows: Merchong Estate – 2003, Mekassar Estate – 2004, Laukin A Estate – 2002, Leepang A Estate – 2001
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	YES	The management review meeting for Bukit Leelau CU conducted separately by the operating unit. The management review was attended by all the managers and estate management. Management is transparent to address continuous suitability, adequacy and effectiveness of the requirements for effective implementation of RSPO.
3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	YES	The continuous improvement plan (CIP) was available dated in July 2020. Based on the CIP, it covers Social, environment, safety and technology sampling on Financial year 2019/20 to build new workers quarters.
	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	NA	Not applicable.
3.3 Operating procedures are appropriately documented, consistently implemented and	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	YES	Bukit Leelau CU adopted the following documented manuals and documents as their standard operating procedures: <ol style="list-style-type: none"> <li>1. Group Standard Operating Procedures (StOP) Oct 2018</li> <li>2. Safe Operating Procedure (SaOP) dated 06/01/2020</li> <li>3. Group Environmental Impact Assessment and Management Action Plans (GEIA)</li> <li>4. IOI Group Policy Documents.</li> <li>5. Oil Palm Agricultural Policy (OPAP) July 2005</li> </ol>



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Clause	Indicators	Comply Yes/No	Findings
monitored.	3.3.2 A mechanism to check consistent implementation of procedures is in place.	YES	<p>There are several mechanisms used to check on consistent implementation of procedures. One of the regular mechanisms used by Bukit Leelau CU are internal audits conducted by Sustainability Team.</p> <p>Mechanism for Internal Checking of HR-related documents has been made available. A systematic Labour Rights monitoring system has been established by Sustainability HQ which consists of 3 stages of pre-employment, employment and post-employment which align with the Group Foreign Workers Recruitment Guideline. There also flow chart contain offer of employment/employment contract, new/amended terms and conditions of employment contract and employee declaration. briefing on the SOPs and related documents.</p>
	3.3.3 Records of monitoring and any actions taken are maintained and available.	YES	All 4 Estates visited continued to maintain records of monitoring and any actions taken. Most records are being maintained for more than a year and some much longer.
3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	NA	Not applicable.
	3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	YES	<p>Bukit Leelau CU has established its environmental aspects / impacts register associated with their activities. Environmental aspect and impact (EAI) which cover form upstream activities such as FFB reception until downstream processes was sighted during assessment. Established for May 2016 to May 2020. Latest reviewed at Bukit Leelau POM on May 2020. The development of the EIA has been carried out through various methods such as: Consultation with estate management, Estate site visits and Consultation with stakeholder and government agencies.</p> <p>The reviews done had involved respective Managers, Assistants and Sustainability Team with involvement of internal/external stakeholders such as from Govt. agencies, neighboring estates, local villagers, suppliers and contractors. So far, no issues related to environmental has been highlighted during stakeholders meeting.</p> <p>Revised Social Impact Assessments for the Mill and each Estate within the Bukit Leelau CU have been carried out and SIA Reports produced. Each unit within the Bukit Leelau CU has its own Revised Social Impact Assessment (SIA). Records of stakeholder meetings were all documented, reviewed and verified during the audit. Each SIA was conducted through participatory method involving all relevant affected parties and stakeholders.</p>

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	YES	It was evident that both social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.
3.5 A system for managing human resources is in place.	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.	YES	Employment procedures for recruitment, selection, hiring, are documented. For foreign workers, there was a Foreign Workers Recruitment Guideline & Procedure in Malaysia signed by N B Sudhakaran, Plantation Director dated October 2017 (Revised July 2018). For foreign workers, the company has also come out with repatriation and abscondment procedure. For Local workers there was an employment Procedures for Local Workers (Recruitment, Selection and Hiring), retirement and termination signed by the Plantation Director dated October 2017.
	3.5.2 Employment procedures are implemented, and records are maintained.	YES	Employment procedures are contained in Foreign Workers Recruitment Guideline & Procedure in Malaysia signed by the Plantation Director dated October 2017 (Revised July 2018). Evidence of implementation is available from workers' files such as application form, interview, medical test and issuance of letter of offer. Sighted during the audit were recruitment files of the following workers as per indicator 6.2.1
3.6 An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	YES	An Occupational Safety, Health and Hygiene Policy has been established and signed by the Plantation Director. It is available in Bahasa Malaysia and English language. The policy has been communicated to all employees through briefings and hardcopy of policies were seen displayed at the estates notice boards. The hazard identification, risk assessment and risk control (HIRARC) procedure was established. Bukit Leelau CU have conducted the risk assessment on all its operation as well as determining their control measures.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	YES	Occupational health and safety (OHS) management plan for Bukit Leelau CU had been established. The OHS management plan sighted addressed issues related to hazards and risks, legal register and its requirements for compliance, OSH awareness and training program, accident and emergency procedures, audiometric test, use of PPE, OSH Committee meetings, etc. Generally, the OSH plans 2019/2020 were acceptable.
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	YES	A documented formal training programme 'Sustainability Program for the Year 2019/2020 and records that covered aspects of RSPO Principles and Criteria was made available to the auditors.

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Clause	Indicators	Comply Yes/No	Findings
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	YES	The CU continued to train its executives, staff and workers. Records of training were kept in the training file. The records included information on the title of the training, name and signature of the attendees, name of the trainer, time and venue.
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	YES	Complete and up to date records and reports that demonstrate compliance with the supply chain model has been verified and training has been provided to PIC to create awareness and increase understanding on supply chain requirement.

### SUPPLY CHAIN REQUIREMENTS FOR MILLS

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.1	Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, the inly MB Module is applicable.	YES	BLPOM obtained certified FFB from own certified supply base and certified outsider crop (as listed below). <u>Bukit Leelau Certification Unit</u> Bukit Leelau Estate, Detas Estate, Merchong Estate, Mekassar Estate, Leepang A Estate, Laukin A Estate <u>IOI Sister Estates</u> Shahzan 1 Estate, Shahzan 2 Estate, Pukin Estate <u>Certified Outsider Crop</u> Bebar Estate, Sungai Jernih Estate
3.8.2	Mass balance Module A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3 <sup>rd</sup> party certified supply base.	NA	NA this Mill IP

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	YES	Projection data available as in Table 4-IP of this report.
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).	YES	The mill meets all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.5	<p>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:</p> <ul style="list-style-type: none"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>• 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 organisation's procedures for the implementation of this standard.</li> <li>• The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</li> </ul>	YES	<p>Reference;                      - CSFFB, CSPO &amp; CSPK Traceability System for Estates, Mills, Warehouse &amp; Trading Companies, dated May 2019                      - RSPO Supply Chain – Module D – CPO Mills: Identity Preserve (IP) dated September 2018</p>
3.8.6	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> <li>• Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>• Effectively implements and maintains the standard requirements within its organisation.</li> <li>• Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non- conformities shall be subject to</li> </ul>	YES	<p>Audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard Revision 2017 requirements. The outcome of the internal audit had been reviewed accordingly by the management during management review dated in July 2020.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>management review at least annually. The organisation shall be able to maintain the internal audit records and reports.</p>		
3.8.7	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. The site shall inform the CB immediately if there is a projected overproduction of certified tonnage. The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	YES	<p>BLPOM had continued to receive certified FFBs from the CU's own supply bases as well as certified FFBs from outsiders. There were 6 supply bases (estates) sending certified FFBs to BLPOM. They were Bukit Leelau Estate, Detas Estate, Merchong Estate, Mekassar Estate, Leepang Estate, and Laukin A Estate (own estates) Boustead Estate – Sungai Jernih and Bebar Estaet (outsider certified FFB) The validity of the certificate of the supplier has been checked accordingly.</p>
3.8.8	<p>Sales and Goods Out The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single-documents or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documentation and specification documentation):</p> <ul style="list-style-type: none"> <li>a) The name and address of buyer;</li> <li>b) The name and address of the seller</li> <li>c) The leading or shipment/delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation</li> <li>i) A unique identification number</li> </ul>	YES	<p>Documented procedures related to sales and goods out were sighted and found adequate. The requirement of sales &amp; goods out especially on notation of applicable Supply Chain model &amp; Certificate number being complied by indicating in weighbridge dispatch ticket.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.9	<p>Outsourcing Activities</p> <p>(i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification.</p> <p>(ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.</p>	YES	<p>BLPOM outsource transportation of certified product prior to delivery to end buyer. Agreement made available as required.</p> <p>For delivery of PK, the lorry being chartered by buyer.</p> <p>The training also has been carried out for transporter in July 2020.</p>
3.8.10	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	YES	List of contact person for both transporters were made available and up-to-date in the List of Stakeholder.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	YES	No new contractors used and will be used in the future for the processing or production of RSPO certified materials.
3.8.12	i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	YES	Sighted CPO and PK delivery note, weighbridge ticket, production data, internal audit and management review records were found up-to-date.
	ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	YES	All records related to RSPO SC were maintained minimum for 2 years.
	iii ) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	YES	Identity Preserved Module, the mill has recorded and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis
	iv) For Mass Balance Module, the mill: a. shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c. The mill can only deliver Mass Balance sales from a positive	NA	Not Applicable since this is IP POM



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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.)		
3.8.13	<p>Extraction rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	YES	<p>BLPOM process all the received certified crop &amp; their processing output will be based on their actual Oil Extraction Rate (OER) as well as Kernel Extraction Rate (KER).</p>
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	YES	
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	YES	<p>Marketing department responsible for the purchase and sell of raw material and finished product respectively. Relevant information will be provided to BLPOM for reference on site. The dispatch of the RSPO certified CPO/ PK to buyer by BLPOM were made based on agreement, as per noted in sales contract.</p> <p>The receiving pit, pipelines and tanks in BLPOM were thoroughly cleaned, swept and flushed before RSPO certified CPO was pumped in to avoid contamination. Dedicated tanks were used to store RSPO certified CPO from BLPOM. The same practice occurs for separate handling of certified palm kernel.</p> <p>For traceability of a specific batch of RSPO certified CPO back to the supplying POM, BLPOM kept the relevant documents such as the weighbridge ticket, CPO dispatch note, Dispatch oil quality ticket, Authorization from transporter, Borang MPOB L3, CPO dispatch authorization were issued by the POM.</p>
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after</p>	YES	<p>The registration of transaction is being carried out by Marketing Department subordinate. Mill receives copy of transaction input to the system on monthly basis based on contract summary (buyer weight being put in).</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform</p>		
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	YES	<p>Relevant information on product claim (including applicable Supply Chain model and certificate number) is being correctly indicated in the relevant outgoing paperwork. BLPOM has not use RSPO corporate logo as well as trademark logo</p>

**Principle 4: Respect community and human rights and deliver benefits**

Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.

Clause	Indicators	Comply Yes/No	Findings
4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	NO	<p>A Sustainable Palm Oil Policy was made available signed by the Group Managing Director &amp; Chief Executive Officer which revised in May 2020. The company have 5 commitments in the policy such as environmental management, human rights and workplace, community development and social impact, traceable supply chains and transparency and wider engagement.</p> <p>However, a policy to respect human rights was not included in the clause on prohibiting retaliation against Human Rights Defenders. A Sustainable Palm Oil Policy include the respect on human rights, however did not include statement on "prohibiting retaliation against Human Rights Defenders". <i>Therefore, Major NCR was raised as MAR 01 2020.</i></p>
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	YES	<p>There is no evidence that Bukit Leelau CU instigates any violence or use any form of harassment in its operations. This was confirmed from interviews conducted with its employees from all levels (staff, workers, security personnel) and during interviews held with local communities.</p>

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.	4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	YES	Bukit Leelau CU is bound by the Company's Standard Operating Procedure known as "Grievance Procedure". The procedure includes the mechanism of receiving, recording and addressing any complaints/grievance from affected parties. Bukit Leelau CU keeps a Grievance/Complaints Book (known as the Green Book by workers, staff and external stakeholders).
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	YES	The documented system in dealing with complaints and grievances are briefed during muster briefing. To ensure that illiterate parties also understand the procedures, verbal briefings are given are translated into the language the affected parties understand.
	4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	YES	There is evidence that parties to a grievance are kept informed of the progress of the complaints.
	4.2.4 The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	YES	The conflict resolution mechanism includes options to access independent legal and technical advice. Procedure On Handling Social states upon failure of negotiation process involving estate management, representatives from the disputed parties, zone heads, third parties and stakeholders, legal proceedings may follow.
4.3 The unit of certification contributes to local sustainable development as agreed by local communities.	4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.	YES	Bukit Leelau CU's significant contributions to the local development include employment opportunities to the local community. .

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Clause	Indicators	Comply Yes/No	Findings
<p>4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>	<p>4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available.</p>	<p>YES</p>	<p>Bukit Leelau CU owned the land as it was leased and bought from the previous land owner which is Pahang State government and KBDYMM Sultan Pahang since 1976 - 2001. Based on the interviews held with local communities, it was confirmed that there is no case concerning the rights of local communities and indigenous peoples. The land titles are issued under the names of Perusahaan Mekassar (M) Sdn Bhd, and the land title specifies land use to be for oil palm. All the visited operating units have the copies of their land titles kept at their administration office.</p>
	<p>4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p>	<p>YES</p>	<p>As reported in 4.4.1 of this checklists, it has been verified that the land is now legitimately owned by Bukit Leelau CU since 1976 - 2001. The audit team had confirmed that there were no land issues related to previous owners.</p>
	<p>4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.</p>	<p>YES</p>	
	<p>4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.</p>		
	<p>4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected</p>		

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.		
	4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).	YES	As reported in 4.4.1 of this checklists, it has been verified that the land is now legitimately owned by Bukit Leelau CU since 1976 - 2001. All the related documentation regarding the land acquisition was kept in IOI Plantations HQ Office, Putrajaya and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate.
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	NA	This requirement in this indicator does not apply to Bukit Leelau CU.
	4.4.5 (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	NA	This requirement in this indicator does not apply to Bukit Leelau CU.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	NA	This requirement in this indicator does not apply to Bukit Leelau CU.
4.5 No new plantings are established on local peoples' land where	4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	YES	Based on Social Impact Assessment (SIA) Report for Bukit Leelau CU and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is now legitimately owned by Bukit Leelau CU since 1976 - 2001. The audit team had confirmed that there were no land issues related to previous owners.

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Clause	Indicators	Comply Yes/No	Findings
<p>it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>	<p>4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p>	<p>YES</p>	<p>As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Bukit Leelau CU since 1976 - 2001. All the related documentation regarding the land acquisition was kept in IOI Plantations HQ Office, Putrajaya and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.</p>
	<p>4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p>	<p>YES</p>	<p>As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Bukit Leelau CU since 1976 - 2001. All the related documentation regarding the land acquisition was kept in IOI Plantations HQ Office, Putrajaya and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.</p>
	<p>4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and land-use planning with local ppls, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p>	<p>YES</p>	<p>As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Bukit Leelau CU since 1976 - 2001. All the related documentation regarding the land acquisition was kept in IOI Plantations HQ Office, Putrajaya and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.</p>

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	4.5.5 Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Bukit Leelau CU since 1976 - 2001. All the related documentation regarding the land acquisition was kept in IOI Plantations HQ Office, Putrajaya and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Bukit Leelau CU since 1976 - 2001. All the related documentation regarding the land acquisition was kept in IOI Plantations HQ Office, Putrajaya and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	YES	There were no new lands acquired for plantation and mills after 15/11/2018. The current operation area including mill and estates as per stated in the land title
4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with thru a documented system that enables indigenous peoples, local communities and other s/holders to express their views through their own representative institutions.	4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	YES	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the "Grievance Procedure for land owner issues", the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the IOI Plantations Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	YES	In accordance with the "Grievance Procedure for land owner issues", the procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established. However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers.

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.	YES	There were no scheme small holdings at IOI Bukit Leelau CU. The Fresh Fruit Bunches are supplied from IOI Plantations owned estates which are certified to RSPO.
	4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	YES	There was no process and outcomes of any negotiated agreements, compensation and payments to any affected parties.
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	YES	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the "Grievance Procedure for land owner issues", the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the IOI Plantations Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	YES	There was no issue regarding compensation (monetary or otherwise) with villagers, local community and neighbouring estate.
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Bukit Leelau CU since 1976 - 2001. All the related documentation regarding the land acquisition was kept in IOI Plantations HQ Office, Putrajaya and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
4.8 The right to use the land is demo and is not legitimately contested by local ppl who can demonstrate that they have legal, customary, or user rights.	4.8.1 Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all ppl who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Bukit Leelau CU since 1976 - 2001. All the related documentation regarding the land acquisition was kept in IOI Plantations HQ Office, Putrajaya and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.



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Clause	Indicators	Comply Yes/No	Findings
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mech.	YES	Land conflict is not present in the area of the unit of certification.
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant reqs.	YES	There was no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations.
	4.8.4 For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).	YES	There was no conflict or dispute over the land.

**Principle 5: Support smallholder inclusion**

Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.

Clause	Indicators	Comply Yes/No	Findings
5.1 The unit of certification deals fairly and transparently with all smallholders	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	YES	This CU is certified under the Identity Preserved supply chain model. Hence, the POM is not accepting any outsiders FFB from smallholders or another private plantation. Therefore, the mill is not required to display current and past prices for FFB
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	YES	No outsider FFB supplies are received from smallholders at IOI Bukit Leelau CU as this mill is Identity Preserved mill, and therefore this Indicator is not applicable.

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
(Independent and Scheme) and other local businesses.	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	YES	In Bukit Leelau POM Price for FFB adopted the MPOB Pricing. All prices are calculated by the MPOB and the mill take the price and follow what MPOB guided. No outsider FFB supplies are received from smallholders at IOI Bukit Leelau CU as this mill is Identity Preserved mill, and therefore this Indicator is not applicable.
	5.1.4 (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	YES	So far, there was no third-party FFBs sent to the mill.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	YES	Fresh Fruit Bunches were supplied from IOI Plantations Berhad owned estates, which is Detas Estate, Bukit Leelau Estate, Merchong Estate, Mekassar Estate, Leepang A Estate and Laukin A Estate. So far, there was no third-party FFBs sent to the mill. Thus, no contract involved with smallholder.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	YES	Interviews conducted with contractors and suppliers, Pengangkutan Teo Sdn Bhd, Sasaran Perentas Sdn Bhd, Contractors representatives had confirmed their understanding of their rights and obligations under the contract. Both contractors confirmed the fairness of the terms of their contract, and payments are usually received within 7 to 10 days of invoice issuance.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	YES	Weighing Equipment in IOI Bukit Leelau POM has been calibrated by yearly basis using accredited weighing company Metrology Corporation Malaysia Sdn. Bhd.
	5.1.8 The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	YES	However, in Bukit Leelau CU, Fresh Fruit Bunches are supplied from Boustead owned estates (which is Detas Estate, Bukit Leelau Estate, Merchong Estate, Mekassar Estate, Leepang A Estate and Laukin A Estate) which are certified to RSPO. There is no third-party FFB sent to the mill. Noted that Bukit Leelau has invited nearby smallholder to promote on RSPO certification. But some smallholder is willing to go for MSPO only and don't want to certify under RSPO due to financial restriction.
	5.1.9 (C) The unit of certification has a grievance mechanism for smallholders	YES	The CU also has developed a Standard Operating Procedure (SOP) on Stakeholder Consultation (Stakeholder Request Procedure', 'Grievances Reporting Flow Chart' and

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	and all grievances raised are dealt with in a timely manner.		'Grievance Procedure for Land Owner Issues'). It contains procedures for consultation and discussions, solving issues/grievances, records and improvements, which is the responsibility of the Manager and Assistant Manager. It also stipulates that issues and grievances can be raised via comments, complaints, or request for information, and that all issues are to be resolved fairly and within the stipulated timeframe.
5.2 The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.	5.2.1 The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	YES	For Bukit Leelau POM, being an Identity Preserved Mill, Bukit Leelau POM does not purchase FFB from smallholders, and no smallholders are in Bukit Leelau CU supply base. Therefore, this indicator is not applicable.
	5.2.2 The unit of certification develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	YES	For Bukit Leelau POM, being an Identity Preserved Mill, Bukit Leelau POM does not purchase FFB from smallholders, and no smallholders are in Bukit Leelau CU supply base. Therefore, this indicator is not applicable.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	YES	For Bukit Leelau POM, being an Identity Preserved Mill, Bukit Leelau POM does not purchase FFB from smallholders, and no smallholders are in Bukit Leelau CU supply base. Therefore, this indicator is not applicable.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	YES	For Bukit Leelau POM, being an Identity Preserved Mill, Bukit Leelau POM does not purchase FFB from smallholders, and no smallholders are in Bukit Leelau CU supply base. Therefore, this indicator is not applicable.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	YES	For Bukit Leelau POM, being an Identity Preserved Mill, Bukit Leelau POM does not purchase FFB from smallholders, and no smallholders are in Bukit Leelau CU supply base. Therefore, this indicator is not applicable.

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**Principle 6: Respect workers' rights and conditions**

Protect workers' rights and ensure safe and decent working conditions.

<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
6.1 Any form of discrimination is prohibited.	6.1.1 (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	YES	The published statement recognising freedom of association is available in the Company's Equal Opportunity and Freedom of Association Policy dated October 2017 signed by the Plantation Director. It contains 7 commitments from the top management in order the company respect freedom of association and collective bargaining to support the fair and equitable treatment of their workers.
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.	YES	Based on documentation reviewed such as employment contracts and letters of offer, pay slips, allocation of housing at the linesite and audit interviews, there is no evidence that local and foreign workers, women and local communities have been discriminated against. Interviews conducted with workers (male, female, local and migrant) as well as local communities also confirmed that this is so. There is also no evidence of payment of recruitment fees by migrant workers.
	6.1.3 The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	YES	Based on interviews with the estate and mill management including documentation review (interview assessment and medical report), recruitment selection, hiring and promotion are based on suitable job vacancies, experience, qualification/skill and medical fitness appropriate for the job. Interview of candidates will be done by Manager and the Assistant Managers where an evaluation form is filled up to determine the suitability of the candidate. These documents are contained in the workers' personal files.
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	YES	As of the date of the audit, there is no pregnant worker sampled. As confirmed by the worker during interview, there is no evidence that pregnancy testing was carried out in a discriminatory manner. Pregnancy test was done on the worker free will. But, if there is case of pregnancy there was necessity for the worker to be accorded an alternative equivalent employment.
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	YES	Bukit Leelau CU follows a Company Policy entitled "Policy on Harassment at Workplace". The implementation of this Policy lies within the purview of the Gender Committee but has been rename to Women Empowerment Committee (WEC). The WEC consists of all women who live within the estate and mill premises, including workers' spouses who are non-employees. This Policy communicated to all levels of workforce by displaying the Policy at the main notice boards in the office and at the workers' housing area.
	6.1.6 There is evidence of equal pay for the	YES	Equal opportunities policy contained within the IOI Policy dated October 2017 states It contains 7 commitments from the top management in order the company respect freedom

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Clause	Indicators	Comply Yes/No	Findings
	same work scope.		of association and collective bargaining to support the fair and equitable treatment of their workers. Comparisons were made of sampled employment contracts and payslips of harvesters from India and harvesters from Bangladesh. Evidence is available that sampled workers receive equal pay for equal work.
6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).	6.2.1 (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages and explained to them in language they understand.	YES	Documentation of pay are available in the form of monthly pay slips, and conditions of pay are contained in employment contracts and letters of employment offer. Copies of these documents are provided to the workers. Briefing on relevant provisions on the Employment Act (e.g. hours of work, rest day) Minimum Wages Order, were also given to the workers. Pay slips prepared in Bahasa and employment contracts are prepared in English and the language workers accordingly such as Indian, Myanmar or Bangladeshi.
	6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.	YES	The employment contracts signed between the estate/mill management contain employment and payment terms and provisions covering duration of employment, place of work, salary, working hours, medical, accommodation, SOCSO, transportation, public holidays, sick leave, annual leave, mutual termination of service, etc. The pay slip is the document that give accurate information on compensation for all work performed. It contains the following information: employee name, IC/passport, gang, month of pay, pay description, (basic, price bonus, productivity incentive, allowances, deductions for SOCSO, EIS, KSWP, total income for the month, total deductions, net pay. None of the workers have family members working to help them with their work.
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	YES	There is evidence that workers observe regular working hours including overtime hours within the legal confines of the Employment Act 1955. This was verified from the mill workers' employment contracts, punch cards and interviews with the workers themselves. They are also entitled to at least 30 minutes' rest after 5 hours of work. Similarly, workers with medical certificates are given a paid medical leave, and female workers are given 3 months' maternity leave. There is no evidence of termination, and so compliance with reasons for dismissal and period of notice could not be verified during this audit. Salary deductions are made for statutory deductions such as SOCSO, EPF, and EIS. For non-statutory deductions such as for payment of electricity and water bills, records are available of written permits from the Department of Labour, Peninsular Malaysia
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are	YES	Field visits to the line sites reveal that generally, the Estates and Mills provide adequate housing to their employees rent-free. Among the facilities provided at the workers' housing complex include a clinic, a playing field, surau, badminton court, and a grocery shop. The estate also provides filtered alkaline water for free which can be assessed by every worker living at the housing complex. A contractor comes to dispose of domestic

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Clause	Indicators	Comply Yes/No	Findings
	available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time is allowed to upgrade the infrastructure.		waste to send to the landfill in Bukit Ibam. Items that can be recycled are segregated for disposal by the contractor. Water quality sampling on domestic use at the workers' housing are being carried out every six months by third party assessor. Medical facilities are available and is managed by a Health Assistant. Serious cases are being sent to the nearest hospital in Muadzam Shah town. A Visiting Medical Officer makes weekly visits and carries out weekly housing inspections too but was limited during pandemic COVID 19.
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	It has been demonstrated by Bukit Leelau CU that efforts are made to ensure workers' access to adequate, sufficient and affordable food.
	6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a "decent living wage" is in place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following: <ul style="list-style-type: none"> <li>• An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers.</li> <li>• There is annual progress on the implementation of living wages</li> <li>• Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment.</li> <li>• The unit of certification may choose to implement the "living wage" payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation</li> </ul> Until such time where the Malaysian version of "decent living wage" has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid.	YES	All sampled workers receive at least minimum wages based on Minimum Wages Order 2020. The new Minimum Wages Order 2020 gazetted on 10 Jan 2020 and came into effect on 1 February 2020. Merchong Estate, Mekassar Estate, Laukin A Estate and Bukit Leelau POM had calculated the prevailing wages and in-kind benefits for their workers. The calculation included housing, electricity, water, transport to work, sports and recreation facilities, education, childcare and healthcare, and found to be deem appropriate.

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	YES	All the estates and mill employ full-time employees. Foreign workers are full-time employees but have a contractual duration which is stipulated in their employment contracts which is 2 years for Indonesian. This contract duration can be mutually extended subject to the annual work permit from the Malaysian Immigration Department.
6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of assoc. and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	6.3.1 (C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.	YES	The published statement recognising freedom of association is available in the Company's Equal Opportunity and Freedom of Association Policy dated October 2017 signed by the Plantation Director. It was explained to the workers during training and muster briefing.
	6.3.2 Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.	YES	Meeting between management and worker's representative was held accordingly. Minutes of meeting made available during audit.
	6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	YES	Evidence is available that all worker representatives were freely appointed by the workers as confirmed by the workers' representatives themselves as confirmed by a harvesting mandore from Merchong and Mekassar Estate and a Bukit Leelau Palm Oil Mill.
6.4 Children are not employed or exploited.	6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	YES	Policy statement for No Child Labour signed on May 2020 by the IOI Group Managing Director. Para Human Rights and Workplace bullet no 3 state that the company eliminate all forms of illegal, forced, bonded, compulsory or child labour. There was also no evidence that the estates and the mill employ anyone below the age of 18 years. This was verified by examining the master lists of each operating unit where details of the workers' IC numbers and dates of birth are available. Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed.
	6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher.	YES	Based on interviews, documentation review and observations in the field, evidence is available that minimum age requirements are met throughout Bukit Leelau CU.

**RSPO PUBLIC SUMMARY REPORT**

<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	There is a documented age screening verification procedure.		
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	YES	There was no evidence that any young persons were employed in any of the units at Bukit Leelau CU as evidenced from documentation review, field observations and interviews.
	6.4.4 The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	YES	Based on the documents sighted, communication about its no child labour Policy was communicated to all levels of employees as evidenced from training records.
6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.	6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	YES	Bukit Leelau CU follows a Company Policy entitled "Policy on Harassment at Workplace". The implementation of this Policy lies within the purview of the Women Empowerment Committee (WEC). The WEC consists of all women who live within the estate and mill premises, including workers' spouses who are non-employees. This Policy communicated to all levels of workforce by displaying the Policy at the main notice boards in the office and at the workers' housing area. The WEC communicates this Policy during meetings, and explained what sexual harassment is, the sexual harassment grievance procedures, flowchart of complaints. In addition, to ensure understanding, those who attended the briefings were requested to answer a set of questions.
	6.5.2 (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	YES	IOI Group Sustainable Palm Oil Policy, statement on reproductive rights as per para 4, Human Rights and Workplace bullet no 8 which company protect reproductive health of women employees and promote women empowerment.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	YES	During this audit, there has been no evidence of any new mothers and therefore this indicator could not be verified. However, based on interview conducted with the Women and Empowerment Committee (WEC), before this if female employee was pregnant, her needs were attended to which included a private room where she could express milk and a fridge for storage were made available.
	6.5.4 A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	YES	IOI Corporation Berhad come out with Grievance Procedure dated Jan 2020. Para 4, the company has stated that the company commits to safeguard all stakeholders involved in the grievance process against potential threats, intimidation, violence or reprisals. Furthermore, the grievance mechanism support with Whistleblowing Policy revised on October 2019. Para 4.0 stated that the complainants may choose to remain anonymous when reporting on the particular grievance.



**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings
<p>6.6 No forms of forced or trafficked labour are used.</p>	<p>6.6.1 (C) All workers have entered into employment voluntarily , and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty to the workers for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>	<p>YES</p>	<p>Agreement with recruitment agency was reviewed. The agreement clearly stated that the agency shall ensure that the workers sign Declaration Letter that they did not pay for any recruitment cost except for security deposit which is refundable and passport, pre-medical check-up and local transportation and accommodation. Based on interview with workers also they understand that they did not pay for any recruitment fees.</p>
	<p>6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p>	<p>YES</p>	<p>This was evident.</p>
<p>6.7 The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>	<p>6.7.1 (C) The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>YES</p>	<p>Estate / Mill Managers were appointed as responsible person(s) for safety and health issues and also chairman for OSH Committee. The Manager subsequently assigned duties of OSH coordinator to the Assistants or healthcare assistant for the down line implementation of OSH practices in the estate and mill. All identified Executives were officially given a letter for such an appointment. Records of regular meetings between the responsible person and workers to discuss about health and safety had been verified to the satisfactory maintained.</p> <p>Occupational Safety Health (OSH) Committee has been established together. The OSH committee organization chart for 2020 was available. The Estate/Mill Manager is the chairman and the Mill Engineer/Assistant Manager is the secretary. OSH Committee meetings confirmed that among the agenda discussed, included the following:</p> <ul style="list-style-type: none"> <li>▪ Passing of previous minutes and arising matters.</li> <li>▪ Accident report (Monthly Data of Mill/Estate Safety Performance)</li> <li>▪ Workplace inspection</li> <li>▪ Safety report and programme</li> </ul>
	<p>6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages and explained in the language</p>	<p>YES</p>	<p>Emergency Response Plan (ERP) was established. Copies of procedures and telephone numbers were sighted on notice boards and muster grounds.</p> <p>Accident and emergency procedures for inhale of a highly toxic pesticides was available and updated at all estates has been samples. Random interview with the estate workers showed that they were aware of accident and emergency procedures.</p>

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Clause	Indicators	Comply Yes/No	Findings
	understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.		Accident statistics were being maintained in a satisfactory manner and periodically reviewed. Accident/injury record were recorded using Lost Time Accident Frequently Rate (AFR) by monthly basis. Quarterly review on accident cases had been carried out during quarterly OSH committee meeting.
	6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.	NO	All staff and workers such as the storekeepers, harvesters and sprayers/manurers were continuously trained in safe working practices including SOP for PPE related to their job function and random interviews conducted showed that they had understood the hazards involved and the usage and handling of chemicals in a safe manner. Appropriate PPE were given to employees of estate and mill visited. Sighted PPE issuance to all workers have been recorded in the "PPE Personal Record". During site visit at harvesting activities and LF collection for all estates, sighted they were seen to wearing PPE such as face masks respirators, goggles, rubber boots, nitrile gloves, apron and hard hat, to cover all potentially hazardous operations. However, at Mekassar Estate Field No. 04E and 06E for Harvesting Operations, sighted 3 frond stacker workers did not wear appropriate personal protective equipment (PPE) i.e. cotton glove as per endorsement by SaOP and HIRARC. <i>Therefore, Major NCR DA 01 2020 was raised.</i>
	6.7.4 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.	YES	Local & Foreign workers are covered by SOCSO (Pertubuhan Keselamatan Sosial).
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	YES	Sighted the Bukit Leelau CU has maintained and updated the LTA Summary by monthly basis. And, the Form JKKP 8 for 2019 was submitted to DOSH in timely manner.

## RSPO PUBLIC SUMMARY REPORT

### **Principle 7: Protect, conserve and enhance ecosystems and the environment**

Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.

Clause	Indicators	Comply Yes/No	Findings
7.1 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.	7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control.	YES	All 4 Estates, Merchong Estate, Mekassar Estate, Laukin A & Leepang A, continued to have a documented integrated pest management (IPM) system in place at all estates. The IPM program among others included pest management of rats, bagworms, nettle caterpillars, <i>Rhinoceros beetles</i> and wild boar. The IPM technique for rats included rearing barn owls ( <i>Tyto alba</i> ), bagworm control included the planting of beneficial plants such as <i>Cassia cobanensis</i> , <i>Antigonan leptopus</i> and <i>Turnera sublate</i> . The implementation was monitored by rat damage, bag worm attack, barn owl population census and records on planting beneficial plants.
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	YES	There was no evidence that species referenced in the Global Invasive Species Database and CABI.org are to be used in managed areas, as per site visited and as per the stakeholder consultation with relevant workers.
	7.1.3 There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.		IOI Group, IOI Plantation, had a Zero Burning Policy dated May 2018 and signed by Plantation Director. It amplifies IOI's commitment towards zero burning practices across their estates. The policy advocated compliance to the Malaysian Environment Quality Act 1974 (EQA 1974) and ASEAN Policy on Zero Burning 2003.
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.	YES	Justification of all pesticides used had been documented in Standard Operating Procedure on Sustainability.
	7.2.2 (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	YES	All estates, Merchong, Mekassar, Laukin A and Leepang A, continued to maintain records on the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, and Ai/Ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, cost books and in progress reports.
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	YES	Bukit Leelau CU continued to have a Pesticide Reduction Plan and Chemical & Fertilizer Reduction Plan. The estates continued to plant nectariferous beneficial plants ( <i>Cassia cobanensis</i> , <i>Antigonan leptopus</i> and <i>Turnera sublate</i> ) as part of the IPM plan. Nurseries were available for continuous planting in the estates to reduce use of insecticides on bagworms and for control of rats included rearing barn owls ( <i>Tyto alba</i> ). EFB was applied in single layers in order to prevent the breeding of Rhinoceros beetles.

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	YES	There was no prophylactic use of pesticides observed in all 4 Estates, Merchong, Mekassar, Laukin A and Leepang A, visited.
	7.2.5 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:	YES	At time of visit all 4 estates only used pesticides that are officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision Pesticides Act 1974 (Act 149) (Section 53A); and in accordance with USECHH Regulations (2000). There was no evidence of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, had been used. The chemical store and chemical list indicated both estates had none of the chemicals. The use of paraquat was phased out in all IOI estates by 31/12/2011 as per Memo dated 23/09/2010 signed by the Group Plantation Director. All pesticides used were class III & class IV and some class II.
	7.2.5a Judgment of the threat and verify why this is a major threat.	YES	As mentioned above in 7.2.5. of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used in 2020. The Estates had used only Class II, Class III and Class IV chemicals. Hence, the need for a judgment of the threat assessment does not apply.
	7.2.5b Why there is no other alternative which can be used.	YES	As mentioned above in 7.2.5. of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used in 2020. Hence, the need for other alternatives does not arise.
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	YES	As mentioned above in 7.2.5. of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used in 2020. Hence, the need for other alternatives does not arise.
	7.2.5d What is the process to limit the negative impacts of the application.	YES	As mentioned above in 7.2.5. of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used in 2020. Hence, the need for other alternatives does not arise.
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	YES	As mentioned above in 7.2.5. of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used in 2020. Hence, the need for other alternatives does not arise.
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always	YES	The estates and mill have the Group Standard Operating Procedures (StOP) and Safe Operating Procedure (SaOP) for use of PPE during working. All workers involved in pesticide application were provided with appropriate PPE and replaced when damaged.

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Clause	Indicators	Comply Yes/No	Findings
	applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.		PPE issue and replacements records were verified by the auditors. It was also observed that PPE was used by workers working in the fields.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	Pesticides selected for use were those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with OSH USECHH Regulations (2000). At all visited mill and estates the storage of pesticides was in accordance with recognized best practices. They were stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders and Pesticides Act 1974 (Act 149) and Regulations. All information regarding the chemicals affixed as product label and the accompanying Safety Data Sheet (see OHS CLASS 2013 Regulations) with details of its usage, hazards, trade and generic names were found available in Bahasa Malaysia language understood by workers or explained carefully to them by a plantation management official at operating unit level.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	Empty pesticide containers was punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. Inventory and consignment documents verified for confirmation of proper management and disposal. The scheduled wastes generated at BL CU not more than 180 days @ 20mt.
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	YES	Aerial spraying was not practiced in all 4 estates, Merchong, Mekassar, Laukin A and Leepang A Estates and there was no evidence to show that any had been carried out.
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	YES	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of	YES	All 4 estates continued to comply with <i>Safety Work Procedure – Chemical Handling &amp; Guidelines on Reproductive Health</i> , where no work with pesticides was given to pregnant or

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.		breast-feeding women. List of sprayers were maintained by all estates and mill. Identification of pregnancy was done at the estate's clinics during the monthly medical check-up and interview with female workers. Pregnancy test was conducted on doubtful cases.
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	YES	Waste management plan has established in environmental management plan and on August 2020.- waste generated by estate – waste management & reduction plan for oil palm field. Among of identification of waste and action plan & monitoring has been carried out accordingly.
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	YES	Proper disposal in place.
	7.3.3 The unit of certification does not use open fire for waste disposal.	YES	During site visit there was no evidence of fire has been used for disposal of waste material. All waste material has been disposed through land fill area and "Tapak Perlupusan Sisa Pepejal- Jalan Muadzam - Bukit Ibam."
7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level that ensures optimal and sustained yield.	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	YES	Bukit Leelau CU continued to practise the maintenance of long-term soil fertility by annual application of fertilizer based on periodic foliar and soil analysis, biomass retention (pruned fronds left to decompose in the fields), EFB application and solid POME application in some fields. During replanting palms were felled, chipped, windrowed and left to decompose in the field. Fertiliser application, which was of paramount importance for maintenance of soil fertility, was carried based on the recommendation made by the Agronomist of IOI Research Centre located in Gemencheh, Batang Melaka, Negeri Sembilan. Annual fertiliser recommendations were made based on annual foliar sampling and soil sampling. Some of the main fertiliser recommend for 2020 were NK Mixture AS, NK Mix ture AC, Kieserite, Rock Phosphate and Borate.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	YES	Records showed that annual tissue and soil sampling had been carried out in all 4 estates, Merchong, Mekassar, Laukin A and Leepang A, to monitor changes in nutrient status. Foliar sampling was carried out to check levels of the nutrients N, P, K, Mg, Ca & B. The soil analysis provided the indication of soil health and monitor the changes in the organic carbon and total nitrogen. Soil sampling was carried out to check levels of the nutrients Organic C, N, Av P, K, Mg, Ca & CEC. The results of these samplings carried out in 2020 will form the basis for the fertilizers input recommendation to maintain and improve soil fertility for 2021.

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Clause	Indicators	Comply Yes/No	Findings																																																								
	7.4.3 A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	YES	All 4 Estates visited had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field, EFB mulching and application of Solid POME. In addition, during replanting, palms were felled, chipped, windrowed and left to decompose.																																																								
	7.4.4 Records of fertiliser inputs are maintained.	YES	All 4 estates, Merchong, Mekassar, Laukin A and Leepang A, continued to monitor their fertilizer inputs as recommended by their agronomist from IOI Research Centre. Sighted fertiliser recommendation for 2020 was made by the Agronomist for all 4 estates. Fertiliser application program was monitored using records like manuring master plan, program sheets, bin cards, field cost book, manuring audits by Planning and Monitoring Department under Upstream Department from headquarters. Records of programs and applications of fertilisers were made available to auditors.																																																								
7.5 Practices minimise and control erosion and degradation of soils.	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	YES	<p>Based on the soils maps, there were no fragile/marginal soils in all 4 estates visited. The soil maps came with description of the soils characteristics such as texture, depth, drainage, parent material and key aspect for management. The soil series were classified as follows:</p> <table border="1"> <thead> <tr> <th>Merchong</th> <th>Mekassar</th> <th>Laukin A</th> <th>Leepang A</th> </tr> </thead> <tbody> <tr> <td>Batang Merbau</td> <td>Batang Merbau</td> <td>Bungor</td> <td>Batu Lapan</td> </tr> <tr> <td>Bungor</td> <td>Bungor</td> <td>Bungor - Lateritic</td> <td>Bungor</td> </tr> <tr> <td>Cherang Hangus</td> <td>Cherang Hangus</td> <td>Durian Lateritic</td> <td>Bungor Lateritic</td> </tr> <tr> <td>Gong Chenak</td> <td>Gajah Mati</td> <td>Durian Malacca</td> <td>Gajah Mati</td> </tr> <tr> <td>Jelutong</td> <td>Gong Chenak</td> <td>Harimau</td> <td>Harimau</td> </tr> <tr> <td>Organic Clay</td> <td>Jelutong</td> <td>Malacca</td> <td>Kedah</td> </tr> <tr> <td>Rengam</td> <td>Munchong</td> <td>Pohoi</td> <td>Malacca</td> </tr> <tr> <td>Serdang</td> <td>Pelepah</td> <td>Rengam</td> <td>Malacca/Bungor Lateritic</td> </tr> <tr> <td>Tai Tak</td> <td>Rengam</td> <td>Serdang</td> <td>Pohoi</td> </tr> <tr> <td></td> <td>Serdang</td> <td>Tawar</td> <td>Rengam</td> </tr> <tr> <td></td> <td>Tai Tak</td> <td>Tebok</td> <td>Serdang</td> </tr> <tr> <td></td> <td>Terap</td> <td>Terap</td> <td>Tebok</td> </tr> <tr> <td></td> <td></td> <td></td> <td>Terap</td> </tr> </tbody> </table>	Merchong	Mekassar	Laukin A	Leepang A	Batang Merbau	Batang Merbau	Bungor	Batu Lapan	Bungor	Bungor	Bungor - Lateritic	Bungor	Cherang Hangus	Cherang Hangus	Durian Lateritic	Bungor Lateritic	Gong Chenak	Gajah Mati	Durian Malacca	Gajah Mati	Jelutong	Gong Chenak	Harimau	Harimau	Organic Clay	Jelutong	Malacca	Kedah	Rengam	Munchong	Pohoi	Malacca	Serdang	Pelepah	Rengam	Malacca/Bungor Lateritic	Tai Tak	Rengam	Serdang	Pohoi		Serdang	Tawar	Rengam		Tai Tak	Tebok	Serdang		Terap	Terap	Tebok				Terap
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Jelutong	Gong Chenak	Harimau	Harimau																																																								
Organic Clay	Jelutong	Malacca	Kedah																																																								
Rengam	Munchong	Pohoi	Malacca																																																								
Serdang	Pelepah	Rengam	Malacca/Bungor Lateritic																																																								
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	7.5.2 No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	YES	It was observed that no replanting of any individual, contiguous area of steep terrain (greater than 25°) larger than 25 Ha in the 4 estates, Merchong, Mekassar, Leepang A and Laukin A, visited.																																																								
	7.5.3 There is no new planting of oil palm on steep terrain.	YES	It was observed that there was no new planting of oil palm in all 4 Estates, Merchong, Mekassar, Leepang A and Laukin A, visited.																																																								

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7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.	7.6.1 (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	YES	IOI Bukit Leelau CU had a management strategy palm oil cultivation in its estates taking into account the soil maps and surveys identifying marginal and fragile soils, including steep terrain for the palm oil long term suitability. The soil maps were provided and reviewed by the auditors it was observed that no fragile or marginal soils were found in all estates, Merchong, Mekassar, Leepang A and Laukin A.
	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	YES	Soils maps prepared by GIS Department, IOI Research Centre unit shows that there are no fragile soils in all Estates, Merchong, Mekassar, Leepang A and Laukin A,
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	YES	The management of all 4 Estates visited continued to use Soil surveys and topographic information as guide in the planning of drainage and irrigation systems, roads and other infrastructure. The soils and slope maps prepared by GIS Department, IOI Research Centre.
7.7 No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	YES	Based on the soil maps prepared by GIS Department, IOI Research Centre and site visits there are no peat soils on Merchong, Mekassar, Leepang A and Laukin A Estates.
	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).	YES	Areas of peat within IOI Corporation Berhad's managed areas had been inventoried, documented and reported to RSPO Secretariat on 15/09/2019. As per the inventoried, document sent to RSPO reported that there was 89.63 Ha of peat area in Peninsular Malaysia in Perusahaan Mekassar (M) Sdn Bhd (Buit Leelau Estate). However, it has been confirmed that the correct Ha is 98.63 – the CU would amend their 2020 report to RSPO.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	YES	Based on the soil maps prepared by GIS Department, IOI Research Centre and site visits there are no peat soils on Merchong, Mekassar, Leepang A and Laukin A, Estates. As such as subsidence of peat was not required to be monitored.
	7.7.4 (C) A documented water and ground cover management programme is in place.	YES	Based on the soil maps prepared by GIS Department, IOI Research Centre and site visits there are no peat soils on Merchong, Mekassar, Leepang A and Laukin A, Estates. As such a no ground cover management plan was required.
	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO	YES	Based on the soil maps prepared by GIS Department, IOI Research Centre and site visits there are no peat soils on Merchong, Mekassar, Leepang A and Laukin A, Estates. As such a no drainability assessment was required to be carried out.



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	<p>recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p>		
	<p>7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.</p>	<p>YES</p>	<p>Based on the soil maps prepared by GIS Department, IOI Research Centre and site visits there are no peat soils on Merchong, Mekassar, Leepang A and Laukin A, Estates.</p>
	<p>7.7.7 (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.</p>	<p>YES</p>	<p>Based on the soil maps prepared by GIS Department, IOI Research Centre and site visits there are no peat soils on Merchong, Mekassar, Leepang A and Laukin A, Estates.</p>
<p>7.8 Practices maintain</p>	<p>7.8.1 A water management plan is in place and implemented to promote more efficient</p>	<p>YES</p>	<p>Bukit Leelau CU Water Management Plan has been reviewed annually and latest updated in July – Aug 2020. The water management plans contain soil water abstraction, treatment,</p>

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
the quality and availability of surface and groundwater.	use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:		storage, monitoring, conservation, pollution prevention, wastewater treatment and discharge as well as domestic usage. Domestic usage was monitored using flow meters in Bukit Leelau CU.
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	YES	There was no restricted access to clean water or contribute to pollution of water to nearby community. Bukit Leelau Cu has conducted yearly water sampling at nearby river or stream. River water analysis was done by IOI Research Center Gemencheh and the river water sampling conducted once a year.
	7.8.1b Workers have adequate access to clean water.	YES	Domestic water analysis results showed no adverse quality. Water analysis, both raw and treated water was conducted one every 6 months by sending the water sampling to third party. Based on the result, water quality monitoring is generally within WHO at all monitoring points.
	7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).	YES	Riparian buffer zones areas were identified and marked. No activities in buffer zone area. Vetiver grass had been planted along the river banks and water catchments. During the field visit, there were evidences that these areas were free from chemical spraying and manuring application. The practices are guided by a SOP Riparian Zone.
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.	YES	An Effluent Treatment Plant (ETP) is available at Bukit Leelau POM to treat the POME. Effluent treatment process flow sighted in the Lay Out Effluent Pond. Stated in the process flow is the maximum mill capacity per hour is 45mt ffb/hr. According to DOE's license, the disposal method of the final discharge is through waterways – Sg. Temiang. 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. All parameters were within the regulatory limit such as BOD discharged to waterways was not more than 100 mg/l.
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	Process water is obtained from water catchment near to the mill. The water usage per tonne of fresh fruit bunches (FFB) continued to be monitored on monthly basis.
7.9 Efficiency of fossil fuel use and the use of renewable energy is optimised.	7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented.	YES	A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the Environmental Impact Assessment, Management Action Plans & Continuous Improvement Plans.
7.10 Plans to reduce pollution and	7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are	YES	The CU had used RSPO Palm GHG version 4.0 Calculator as a tool to calculate the GHG emissions. Sighted report sends to RSPO in Sept 2020. The input data was verified and the following were determined:

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emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.	implemented, monitored through the Palm GHG calculator and publicly reported.		<table border="1"> <thead> <tr> <th>Description</th> <th>tCO<sub>2</sub>e/tProduct</th> <th>Production</th> <th>t/yr</th> </tr> </thead> <tbody> <tr> <td>CPO</td> <td>2.53</td> <td>FFB Processed</td> <td>207484.92</td> </tr> <tr> <td>PK</td> <td>2.53</td> <td>CPO Processed</td> <td>49724.92</td> </tr> </tbody> </table>				Description	tCO <sub>2</sub> e/tProduct	Production	t/yr	CPO	2.53	FFB Processed	207484.92	PK	2.53	CPO Processed	49724.92															
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	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).	YES	Auditor has verified through checking the <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , Google Maps, Estate Maps and also through site visit to the sampled estates areas. Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at Bukit Leelau CU. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.																																						
	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	YES	All waste products and sources of pollution identified and documented through "Waste Management Plan & Reduction Plan for the Year 2020" in the Environmental Management Plan and Environmental Impact assessment that applicable for both mill and estates. The waste management plan has also identified source of waste products/pollutants, waste generation, action plan & monitoring, documents to be reviewed, management review, comments & time bound and person in charge. Other sources of pollutions are also listed in the plan such as workshop, line-site, office, store, canteen, effluent pond, boiler. Sources of pollution and waste have been adequately identified by the mill and estate. Generally, the wastes identified were of general, recyclable and scheduled wastes. It had listed the waste product, sources of pollution, mitigation measures, target, and person responsible.																																						
7.11 Fire is not used for preparing land and is	7.11.1 (C) Land for new planting or replanting is not prepared by burning.	YES	During site visits there was no new planting at Bukit Leelau CU.																																						
	7.11.2 The unit of certification establishes	YES	Bukit Leelau CU has established Emergency response plan fire in field / peat areas in own																																						

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prevented in the managed area.	fire prevention and control measures for the areas under its direct management.		<p>or neighboring estate. firefighting equipment was available &amp; sufficient such as:</p> <ul style="list-style-type: none"> <li>• Water tank with hose</li> <li>• Water tank pump</li> <li>• Pails and buckets</li> <li>• Spray pump</li> <li>• Fire extinguisher</li> </ul>
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	YES	At Bukit Leelau Certification Units engages with adjacent stakeholders on fire prevention and control measures during stakeholder meeting in Feb (Laukin A & Leepang A), Aug (Merchong) and Sept 2020 (Mekassar).
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.	7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	YES	No new land clearing since Nov 2015 available at IOI Bukit Leelau CU, thus this Indicator was not Applicable.
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	YES	There is a HCV Assessment for each estate using internal Assessor:
	7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.	YES	HCV Assessment Report was prepared on September 2014 and reviewed on August 2020. Amendment of HCV / Conservation areas – Increase in HCV / Conservation area by 6.77 Ha due to GIS adjustment and mapping. Total HCV / Conservation areas in Bukit Leelau CU @ 29.43 ha.
	7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.	YES	

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	7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations.	YES	HCV Management Action Plans and Continuous Improvement Programme for all estates were made available during audit.
	7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	YES	There were no rights of local communities have been identified in HCV areas at IOI Bukit Leelau CU. So, this indicator was not applicable with this CU.
	7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	YES	Awareness training pertaining HCV and RTE were provided to staff and workers. Trainings were evident. Among other, the training contains information about legal and disciplinary actions if found guilty.

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Clause	Indicators	Comply Yes/No	Findings
	7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	YES	There were no RTE reported present in the supply bases. However, the supply bases continued implement action plans such as to conserve the identified areas, boundary monitoring, and buffer zone awareness to staff and workers.
	7.12.8 (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.	YES	Not applicable since there is no new land clearing

### RSPO Certifications Systems for Principles & Criteria June 2017

Clause	Indicators	Comply Yes/No	Findings																								
4.5.3 Time-bound plan  Note: Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised;	(a) As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	YES	IOI Corporation Berhad is in progress to certify 5 PMU's from 2020 to 2021 as verified through Time Bound Plan (TBP) as at 01/07/2020 as follows: <table border="1" style="width: 100%; margin-top: 10px;"> <thead> <tr> <th style="text-align: center;">No</th> <th style="text-align: center;">Plantation Management Unit (PMU)</th> <th style="text-align: center;">TBP (Year)</th> <th style="text-align: center;">Status</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td>PT Sukses Karya Sawit, Indonesia</td> <td style="text-align: center;">2021</td> <td>RSPO Stage 1</td> </tr> <tr> <td style="text-align: center;">2</td> <td>PT Berkat Nabati Sawit, Indonesia</td> <td style="text-align: center;">2021</td> <td>RSPO Stage 1</td> </tr> <tr> <td style="text-align: center;">3</td> <td>PT Bumi Sawit Sejahtera, Indonesia</td> <td style="text-align: center;">2021</td> <td>RSPO Stage 1</td> </tr> <tr> <td style="text-align: center;">4</td> <td>PT KPAM, Indonesia</td> <td style="text-align: center;">2021</td> <td>RSPO Stage 1</td> </tr> <tr> <td style="text-align: center;">5</td> <td>IOI-Pelita Sarawak</td> <td style="text-align: center;">2021</td> <td>Resolution process (under RSPO CP)</td> </tr> </tbody> </table> <p>The Stage 1 of RSPO P&amp;C audit was conducted on 9th – 12th September 2019 by BSI (for Indonesia CU). However, due to the pandemic issue, certification preparation was affected such as HGU process and as well as on ground preparation. Hence, the main assessment audit expected to be conducted in year 2021. Sighted approval letter from RSPO on January 2020.</p>	No	Plantation Management Unit (PMU)	TBP (Year)	Status	1	PT Sukses Karya Sawit, Indonesia	2021	RSPO Stage 1	2	PT Berkat Nabati Sawit, Indonesia	2021	RSPO Stage 1	3	PT Bumi Sawit Sejahtera, Indonesia	2021	RSPO Stage 1	4	PT KPAM, Indonesia	2021	RSPO Stage 1	5	IOI-Pelita Sarawak	2021	Resolution process (under RSPO CP)
No	Plantation Management Unit (PMU)	TBP (Year)	Status																								
1	PT Sukses Karya Sawit, Indonesia	2021	RSPO Stage 1																								
2	PT Berkat Nabati Sawit, Indonesia	2021	RSPO Stage 1																								
3	PT Bumi Sawit Sejahtera, Indonesia	2021	RSPO Stage 1																								
4	PT KPAM, Indonesia	2021	RSPO Stage 1																								
5	IOI-Pelita Sarawak	2021	Resolution process (under RSPO CP)																								

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	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	YES	The time-bound plan contain a list of subsidiaries, estates and mills. Based on the time bound plan (Refer to Attachment 7), 14 units have been certified after obtaining RSPO membership and 5 uncertified units are in progress for certification.
	(c)	Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);	YES	No revision of the time bound plan. The time bound plan was endorsed by the Sustainability Department, IOI Corporation Berhad.
4.5.4 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. Any new plantings since 1 <sup>st</sup> January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	YES	Based on the internal audit report for 8 uncertified unit of IOI Group dated 16-19/07/2019 (Indonesia), 19-21/02/2019 (Sarawak) and the time bound plan, there was no new replacement of primary forest or HCV after 01/01/2010, including for 1 uncertified units at IOI Pelita (Sarawak). However, for the other 4 uncertified units namely, PT Sukses Karya Sawit, PT Berkat Nabati Sawit, PT Bumi Sawit Sejahtera and PT KPAM, replacement of primary forest after 1/1/2010 were reported. Update on the RSPO Suspension and Complaint by Aidenvironment against PT Sukses Karya Sawit (PT SKS), PT Berkat Nabati Sawit (PT BNS) and PT Bumi Sawit Sejahtera (PT BSS); Final verification by RSPO CP was conducted at the end of Jan 2018. IOI received a letter from RSPO Complaints Panels' dated 12/7/2018 with regards to the final decision on the complaint. Few additional recommendations were highlighted in their letter. Further and updated progress of this issue could



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				<p>be access through the link below;  <a href="https://rspo.org/members/complaints/statusof-complaints/view/80">https://rspo.org/members/complaints/statusof-complaints/view/80</a>.                      Certification preparations in progress. As part of the preparation, a Certification Body had been engaged to conduct the gap assessment. The gap assessment was conducted at the end of Aug 2018 and the management planned to go RSPO Assessment Stage 1 in Aug 2019. Governmental 'Hak Guna Usaha' (HGU) application in progress. As for PT KPAM, Indonesia, this company is in the process to conduct NPP upon completion of HCV report and review by HCVRN. All reports will be posted on the RSPO for Public Consultation.</p>
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6;	YES	<p><u>IOI-Pelita Sarawak</u>                      Handing over of the ex-gratia payment ceremony has been conducted on 5th September 2019 in Miri involving members from 4 main communities respectively. Second stage of the Resolution Plan, 3D Community Participatory Mapping, started in August 2019. Technical assistance to the affected communities is being provided by CICOM. By mid-March 2020, six out of nine affected communities had their surveys done. Unfortunately, at that point, the coronavirus outbreak reached Sarawak and the government issued Movement Control Order. The Community Participatory Mapping had to be put on hold.</p>
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3;	YES	Based on internal audit report for uncertified units of IOI Group dated 16-19 July 2019 (Indonesia), 19 -21 February 2019 (Sarawak), there was no issue on labour disputes for all uncertified units.
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	YES	Based on internal audit report for uncertified units of IOI Group dated 16-19 July 2019 (Indonesia), 19 -21 February 2019 (Sarawak), there was no issue on legal non-compliance for all uncertified units.
	(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	YES	Based on internal audit report for uncertified units of IOI Group dated 16-19 July 2019 (Indonesia), 19 -21 February 2019 (Sarawak), the IOI had assessed all uncertified units on the requirements (a) – (e). IOI Group also has made a positive assurance statement for A) Time bound plan, B) Requirements for uncertified management units and/or holdings, and C) Timely Notification of Changes, through an official letter 'Statement of Declaration by Organization (Grower) on the compliance with Rules for Partial Certification as per Time Bound Plan dated 01 July 2020.

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		acceptable. Verification of compliance shall be based on the following approach:		
		<ul style="list-style-type: none"> <li>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;</li> </ul>	YES	
		<ul style="list-style-type: none"> <li>Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.</li> </ul>	YES	Based on internal audit report for uncertified units of IOI Group dated 16-19 July 2019 (Indonesia), 19 -21 February 2019 (Sarawak), the IOI had assessed all uncertified units on the requirements (a) – (e). IOI Group also has made a positive assurance statement for A) Time bound plan, B) Requirements for uncertified management units and/or holdings, and C) Timely Notification of Changes, through an official letter 'Statement of Declaration by Organization (Grower) on the compliance with Rules for Partial Certification as per Time Bound Plan dated 01 July 2020.
		<ul style="list-style-type: none"> <li>Desktop study e.g. web check on relevant complaints</li> </ul>	YES	Verified through RSPO website: <a href="https://www.rspo.org/members/status-of-complaints/">https://www.rspo.org/members/status-of-complaints/</a> , <a href="https://askrspo.force.com/Complaint/s/case/50090000028Erz8AAC/detail">https://askrspo.force.com/Complaint/s/case/50090000028Erz8AAC/detail</a>
		<ul style="list-style-type: none"> <li>If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.</li> </ul>	YES	No further stakeholder consultation or field inspection were conducted.
4.6.4 The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall		No additional indicators	YES	Bukit Leelau CU owned the land as it was leased and bought from the previous land owner which is Pahang State government and KBDYMM Sultan Pahang since 1976 – 2001, the land title specifies land use to be for oil palm and it was confirmed that there is no case concerning the rights of local communities and indigenous peoples.

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<p>consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p>				
<p>Note:</p> <ol style="list-style-type: none"> <li>1. For requirements 4.5.4 (a)-(d) above, the definition of major and minor NC is stated in the RSPO P&amp;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;</li> <li>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.</li> </ol>				

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**Attachment 4**

**DETAILS OF NON-CONFORMITIES AND CORRECTIVE ACTIONS TAKEN**

<b>P &amp; C Indicator</b>	<b>Specification Major/Minor</b>	<b>Detail Non-conformances</b>	<b>Corrective Action</b>	<b>Verification by Assessor</b>
4.1.1 MAR 01 2020	Major	<p>Finding: A policy to respect human rights was not include the clause on prohibiting retaliation against Human Rights Defenders.</p> <p>Objective evidence: A Sustainable Palm Oil Policy include the respect on human rights, however did not include statement on “prohibiting retaliation against Human Rights Defenders”.</p>	<p>The following words "Respect and uphold the rights of all workers, including contract, temporary, and migrant workers, as well as protecting human rights defenders against threats and retaliation in accordance with the Universal Declaration of Human Rights, the International Labor Organization's core conventions, United Nations Guiding Principles on Business and Human Rights, United Nations Global Compact on human rights, labor, environment and anti-corruption and the principles of Free and Fair Labor in Palm Oil Production" has been included in IOI's revised Sustainable Palm Oil Policy (SPOP) dated October 2020. The SPOP has since been distributed to all O.Cs on 12th October 2020 and O.Cs have been informed to conduct briefing to all workers.</p>	<p>Auditor has verified the evidences attached of IOI's revised Sustainable Palm Oil Policy (SPOP) dated October 2020. Sighted “Respect and uphold the rights of all workers, including contract, temporary, and migrant workers, as well as protecting human rights defenders against threats and retaliation in accordance with the Universal Declaration of Human Rights” has been included in the revision policy.</p> <p><b>Status: Closed</b> <b>The implementation of corrective action will be verified by next audit.</b></p>
6.7.3 DA 01 2020	Major	<p>Finding: Workers did not were appropriate personal protective equipment (PPE) to cover all potentially hazardous operations.</p> <p>Objective evidence: During site visit at Mekassar Estate Field No. 04E and 06E for Harvesting Operations, sighted 3 Frond Stacker workers did not wear appropriate personal protective equipment (PPE) i.e. cotton glove as per endorsement by SaOP and HIRARC.</p>	<p>PPE checklist was prepared and supervisors are using it to check on PPE every morning before workers start work. Furthermore, Refreshment training on the usage of PPE for workers, mandores, supervisors and assistant managers was carried out on 06/10/2020. The supervisor concerned was issued with a warning letter for failing to ensure that the workers under his supervision use the appropriate PPE (cotton gloves).</p>	<p>Auditor has verified the evidences attached of:</p> <ol style="list-style-type: none"> <li>1) PPE Checklist for harvesters October 2020</li> <li>2) Training material for Safe Work Procedure of Harvesting Training. The training was conducted on 06/10/2020 and attended by all harvesters of Mekassar Estate.</li> <li>3) Warning letter dated 30/09/2020 has been issued to Staff Harvesting for failing to ensure that the workers under his supervision use the appropriate PPE (cotton gloves).</li> </ol> <p><b>Status: Closed</b> <b>The implementation of corrective action will be verified by next audit.</b></p>

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**Attachment 5**

**STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED (SURVEILLANCE AUDIT 4)**

<b>P &amp; C Indicator</b>	<b>Specification Major/Minor</b>	<b>Detail Non-conformances</b>	<b>Verification by Assessor</b>
<p>MYNI 2019 3.3.2</p> <p>MYNI 2014 4.1.2</p> <p>RZ 01 2019</p>	<p>Major (Recurrent Minor)</p>	<p>Objective evidence: The contents of the following paragraphs conflict with each other:</p> <p>a. IOI Group Sustainable Palm Oil Policy revised in March 2018 (under paragraph Human Rights and Workplace), states that IOI Group commits to “eliminate all forms of illegal, forced, bonded, compulsory... labor ...”</p> <p>b. Paragraph 3e) of New/Amended Terms and Conditions of Employment Contract states that “The Employee undertakes to work with the Employer for 3 years...”, whereas paragraph 12 d) states that “The Employee may terminate this contract by giving 14 days’ notice...”</p> <p>c. Paragraph 12e) Offer of Employment as Plantation Worker states that “The Employee undertakes to work with the Employer for 3 years...”, whereas paragraph 3 d) states that “The Employee may terminate this contract by giving 14 days’ notice...”</p> <p>d. Paragraph 9 of the Employee Declaration states “I guarantee to work with the Company for at least 3 years”.</p>	<p>Mechanism for Internal Checking of HR-related documents has been made available. A systematic Labour Rights monitoring system has been established by Sustainability HQ which consists of 3 stages of pre-employment, employment and post-employment which align with the Group Foreign Workers Recruitment Guideline. There also flow chart contain offer of employment/employment contract, new/amended terms and conditions of employment contract and employee declaration.</p> <p><b>Status: Closed</b></p>
<p>MYNI 2019 3.4.3</p> <p>MYNI 2014 5.1.1</p> <p>DZ 01 2019</p>	<p>Major</p>	<p>Objective evidence: Transportation of fertilizers and chemical for spraying activities to the field have not been assessed in the environment impact assessment (EIA) report.</p>	<p>Environmental impact assessment has been updated on July 2020. The impacts assessments were conducted to cover all estate operation such as upkeep immature &amp; mature areas, harvesting, FFB collection, maintenance and repairs at workshop, scrap iron area, tractor washing bay, SW store, chemical store, fertilizer store, WTP, line site and office, transportation of fertilizer and spraying chemicals, etc.</p> <p><b>Status: Closed</b></p>
<p>MYNI 2019 6.6.2</p> <p>MYNI 2014 6.12.3</p>	<p>Major</p>	<p>Objective evidence: Workers who have complied with the conditions stipulated in 2a &amp; b above have not been paid the official recruitment cost. They are: Bukit Leelau Estate</p> <ol style="list-style-type: none"> <li>1. Worker Passport No. BK0886672</li> <li>2. Worker Passport No. BP0481737</li> <li>3. Worker Passport No. BN0535410</li> </ol>	<p>During audit at Merchong Estate, 11 workers involved for recruitment fee reimbursement. It was evident through acknowledgement receipt between Merchong Estate and the workers from Bangladeshi, all the workers involved have received the recruitment fee reimbursement whether cash or bank in through their own account bank.</p> <p>During audit at Mekassar Estate, 15 workers involved for recruitment fee reimbursement. It was evident through acknowledgement receipt between</p>

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RZ 02 2019		<p>4. Worker Passport No. BP0040228                      5. Worker Passport No. BN0713679                      6. Worker Passport No. BR0519241                      Leepang A Estate                      7. Worker Passport No. BJ0894352                      8. Worker Passport No. BN0982352                      9. Worker Passport No. BL0663010                      10. Worker Passport No. BF0791774</p> <p>Therefore, the special labour policy and procedures have not been implemented for the sampled workers above</p>	<p>Merchong Estate and the workers from Bangladeshi, all the workers involved have received the recruitment fee reimbursement whether cash or bank in through their own account bank.</p> <p><b>Status: Closed</b></p>
<p>MYNI 2019 SCCS 3.8.7</p> <p>MYNI 2014 D.4.2</p> <p>SK 01 2019</p>	Major	<p>Objective evidence:                      1. CPO production more than certified volume,                      2. No approval record from RSPO EB.</p>	<p>There was no overproduction at Bukit Leelau Certification Unit for this year audit and the actual data available as in Table 3-IP of this report.</p> <p><b>Status: Closed</b></p>

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**Attachment 6 – Timebound Plan**

**Time Bound Plan  
Details of Time Bound Plan as submitted by IOI Plantation Services Sdn Bhd (July 2020)**

<b>No</b>	<b>PMU</b>	<b>Supply Bases (Estate Name)</b>	<b>Main Assessment</b>	<b>Certification Status</b>	<b>Status</b>	<b>Updated Information on Minimum Requirements for Multiple Management Units , Clause 4.5.1 RSPO Certification Systems for Principles &amp; Criteria</b>
1.	Pamol (Sabah) POM, Sabah	Meliau, Nangoh, Rungus, Tindakon, Ulu, Sugut & Bayok	May 2008	Re-Certified in November 2016	ASA-04 audit completed in July 2020	In the process of closing Nonconformities
2.	Sakilan POM	Sakilan, Linbar 1 and Linbar 2	Nov 2008	Re-Certified in Mar 2020	Recertification audit completed in November 2019.	No outstanding issues
3.	Pamol Kluang POM	Pamol Timur, Pamol Barat, Mamor, Unijaya, Kahang and Swee Lam	Mar 2009	Re-Certified in Apr 2020	Recertification audit completed in November 2019	No outstanding issues
4.	Gomali POM	Gomali, Paya Lang, Bahau, Bertam, Bukit Dinding, Kuala Jelai, Tambang, Regent, Sagil, Jasin Lalang and Sembilan Tani (Associated Outgrower)	Aug 2009	Re-Certified in Aug 2015	Recertification audit completed in July 2020	In the process of closing Nonconformities
5.	Baturong POM	Baturong 1, Baturong 2, Baturong 3 and Cantawan	Sept 2009	Re-Certified in Oct 2015	ASA-04 audit completed in July 2019.	No outstanding issues

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6.	Bukit Leelau POM	Bukit Leelau, Detas, Merchong, Mekassar, Leepang A and Laukin A	Apr 2010	Re-Certified in Nov 2015	ASA-04 audit completed in August 2019	No outstanding issues
7.	Mayvin POM	Mayvin 1, Mayvin 2, Mayvin 5, Mayvin 6 and Tangkulap	Aug 2010	Re-Certified in Dec 2015	ASA-04 audit completed in August 2019	No outstanding issues
8.	Pukin POM, Pahang	Pukin, Shahzan 1, Shahzan 2, Segamat and Bukit Serampang	Dec 2010	Re-certified in June 2016	ASA-04 audit completed in March 2020	No outstanding issues
9.	Leepang (Sabah) POM	Morisem 5, Leepang 1, Leepang 5, Permodalan 1, Permodalan 2, Permodalan 3, and Permodalan 4	Aug 2012	Re-certified in December 2018	ASA-01 audit completed in October 2019	No outstanding issues.
10.	Syarimo POM	Syarimo 1, Syarimo 2, Syarimo 3, Syarimo 4, Syarimo 5, Syarimo 6, Syarimo 7, Syarimo 8 and Syarimo 9	Sept 2012	Re-certified in Mar 2018	ASA-02 audit completed in January 2020.	No outstanding issues
11.	Ladang Sabah POM	Moynod, Luangmanis, Terusan Baru, Sungai Sapi, Laukin, Labuk, Bimbingan 1, and Bimbingan 2	Oct 2012	Re-certified in July 2018	ASA-02 audit completed in January 2020.	No outstanding issues



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12.	Morisem POM, Sabah	Morisem 1, Morisem 2, Morisem 3, Morisem 4, Leepang 2, Leepang 3, and Leepang 4	Sept 2013	Re-certified in December 2018	ASA-01 audit completed in September 2019	No outstanding issues
13.	Unico POM-1, Sabah	Unico 6, Ladang Asas (Tas & Halusah), 31 (Outgrowers & Smallholders)	Planned - 2018	Certified in July 2018	ASA-02 audit completed in July 2020.	In the process of closing Nonconformities Outgrowers and Smallholders are not part of the certified area
14.	Unico Desa POM-2, Sabah	Unico 1, Unico 2, Unico 3, Unico 4, Unico 5 and 17 (Outgrowers & Smallholders)	Dec 2017	Certified in May 2018	ASA-02 audit completed in February 2020.	No outstanding issues Outgrowers and Smallholders are not part of the certified area
15.	<b>IOI – Pelita, Sarawak</b>	Sejap and Tegai	<b>Planned – TBC as it is under the resolution process</b>	<b>Uncertified Unit</b>	IOI – Pelita (Sarawak) is in the resolution process (under RSPO CP)	<p>CICOM completed the Capacity Building Program at the end of June 2019.</p> <p>Currently, with input from all stakeholders, including the State of Sarawak Government, IOI is evaluating options in regards to the surveyors to be involved in the Community Participatory Mapping.</p> <p>Further and updated progress of this issue could be access through the link below;</p> <p>(a) <a href="#">IOI Pelita Land Dispute Resolution Plan</a></p> <p>(b) <a href="#">Current progress on IOI Pelita Land Dispute Resolution Process</a></p> <p>(c) <a href="https://www.ioigroup.com/Content/MEDIA/Media?Category=7">https://www.ioigroup.com/Content/MEDIA/Media?Category=7</a></p> <p>(d) <a href="#">RSPO Case Tracker – IOI Pelita Status of Complaints</a></p> <p>Handing over of the ex-gratia payment ceremony has been conducted on 5th September 2019 in Miri involving members</p>

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						<p>from 4 main communities respectively. Second stage of the Resolution Plan, 3D Community Participatory Mapping, started in August 2019. Technical assistance to the affected communities is being provided by CICOM. By mid-March 2020, six out of nine affected communities had their surveys done. Unfortunately, at that point, the coronavirus outbreak reached Sarawak and the government issued Movement Control Order. The Community Participatory Mapping had to be put on hold.</p>
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16.	PT SKS, Indonesia	SKS 1, SKS 2, and SKS 3	Planned - 2021	Uncertified Unit	RSPO Stage 1 was conducted in September 2019	<p>RSPO Complaints Panel (CP) has officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development. First and Second quarterly update for the action plan on PT. SKS, PT. BNS and PT. BSS was submitted to RSPO Investigate and Monitoring Unit in December 2018 and February 2019 respectively.</p> <p>On 15<sup>th</sup> April 2019, RSPO's official announced "that the monitoring of the implementation of the Complaints Panel directives for "PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No: GR-000882 " is now officially closed."</p> <p>IOI received an email from RSPO that "the Investigation &amp; Monitoring Unit (IMU) of the RSPO Secretariat had finalized the internal review of the action plan and progress reports submitted by IOI against the Complaints Panel's directives and the IMU concluded that IOI has successfully met all the requirements set by the Complaints Panel."</p> <p>Further and updated progress of this issue could be access through the link below;</p> <p>(a) <a href="#">RSPO Ketapang Complaint for PT BSS, PT SKS &amp; PT BNS</a></p> <p>(b) <a href="#">RSPO Case Tracker – PT BSS, PT SKS &amp; PT. BNS Status of Complaints</a></p> <p>(c) <a href="#">RSPO Post-Complaints Monitoring</a></p> <p>The Stage 1 of RSPO P&amp;C audit was conducted on 9<sup>th</sup> – 12<sup>th</sup> September 2019 by BSI</p> <p>Due to the pandemic issue, certification preparation was affected such HGU process and as well as on ground preparation. Hence, the main assessment audit expected to be conducted in year 2021.</p>
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17.	<b>PT BNS, Indonesia</b>	BNS 1, BNS 2, BNS 3 and BNS 4	<b>Planned - 2021</b>	<b>Uncertified Unit</b>	RSPO Stage 1 audit was conducted in September 2019	<p>RSPO Complaints Panel (CP) has officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development. First and Second quarterly update for the action plan on PT. SKS, PT. BNS and PT. BSS was submitted to RSPO Investigate and Monitoring Unit in December 2018 and February 2019 respectively.</p> <p>On 15<sup>th</sup> April 2019, RSPO's official announced "that the monitoring of the implementation of the Complaints Panel directives for "PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No: GR-000882 " is now officially closed."</p> <p>IOI received an email from RSPO that "the Investigation &amp; Monitoring Unit (IMU) of the RSPO Secretariat had finalized the internal review of the action plan and progress reports submitted by IOI against the Complaints Panel's directives and the IMU concluded that IOI has successfully met all the requirements set by the Complaints Panel."</p> <p>Further and updated progress of this issue could be access through the link below;</p> <ul style="list-style-type: none"> <li>a) <a href="#">RSPO Ketapang Complaint for PT BSS, PT SKS &amp; PT BNS</a></li> <li>b) <a href="#">RSPO Case Tracker – PT BSS, PT SKS &amp; PT. BNS Status of Complaints</a></li> <li>c) <a href="#">RSPO Post-Complaints Monitoring</a></li> </ul> <p>The Stage 1 of RSPO P&amp;C audit was conducted on 9<sup>th</sup> – 12<sup>th</sup> September 2019 by BSI</p> <p>Due to the pandemic issue, certification preparation was affected such as HGU process and as well as on ground preparation. Hence, the main assessment audit expected to be conducted in year 2021.</p>
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18.	PT BSS, Indonesia	BSS 1, BSS 2, BSS 3 and BSS 4	Planned - 2021	Uncertified Unit	RSPO Stage 1 was conducted in September 2019	<p>RSPO Complaints Panel (CP) has officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development. First and Second quarterly update for the action plan on PT. SKS, PT. BNS and PT. BSS was submitted to RSPO Investigate and Monitoring Unit in December 2018 and February 2019 respectively.</p> <p>On 15<sup>th</sup> April 2019, RSPO's official announced "that the monitoring of the implementation of the Complaints Panel directives for "PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No: GR-000882 " is now officially closed."</p> <p>IOI received an email from RSPO that "the Investigation &amp; Monitoring Unit (IMU) of the RSPO Secretariat had finalized the internal review of the action plan and progress reports submitted by IOI against the Complaints Panel's directives and the IMU concluded that IOI has successfully met all the requirements set by the Complaints Panel."</p> <p>Further and updated progress of this issue could be access through the link below;</p> <ul style="list-style-type: none"> <li>a) <a href="#">RSPO Ketapang Complaint for PT BSS, PT SKS &amp; PT BNS</a></li> <li>b) <a href="#">RSPO Case Tracker – PT BSS, PT SKS &amp; PT. BNS Status of Complaints</a></li> <li>c) <a href="#">RSPO Post-Complaints Monitoring</a></li> </ul> <p>The Stage 1 of RSPO P&amp;C audit was conducted on 9<sup>th</sup> – 12<sup>th</sup> September 2019 by BSI</p> <p>Due to the pandemic issue, certification preparation was affected such HGU process and as well as on ground preparation. Hence, the main assessment audit expected to be conducted in year 2021.</p>
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**RSPO PUBLIC SUMMARY REPORT**

19.	<b>PT KPAM, Indonesia</b>	Under Development	<b>Planned - 2023</b>	<b>Uncertified Unit</b>	<p>NPP and HCSA was approved in April 2018. Currently under development.</p>	<p>RSPO has approved PT.KPAM NPP Summary Report and was published in RSPO website for public notification on 13 April 2018. The NPP public notification could be assessed through the link below:</p> <p><a href="https://rspo.org/certification/new-planting-procedure/publicconsultations/page/2?">https://rspo.org/certification/new-planting-procedure/publicconsultations/page/2?</a></p> <p>HCSA Peer Review Assessment completed on 14 May 2018. The HCSA Peer Review Report and Summary Report could be assessed through the link below:</p> <p><a href="http://highcarbonstock.org/wp-content/uploads/2018/05/PRR-PT.KPAM.pdf">http://highcarbonstock.org/wp-content/uploads/2018/05/PRR-PT.KPAM.pdf</a></p> <p>The Stage 1 of RSPO P&amp;C audit was conducted on 9<sup>th</sup> – 12<sup>th</sup> September 2019 by BSI</p> <p>Due to the pandemic issue, certification preparation was affected such HGU process and as well as on ground preparation. Hence, the main assessment audit expected to be conducted in year 2021</p>
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