

RSPO PUBLIC SUMMARY REPORT



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

File Ref.: ES11320001

RSPO PUBLIC SUMMARY REPORT

CLIENT : WILMAR INTERNATIONAL LIMITED – SAREMAS 1 CERTIFICATION UNIT
PARENT COMPANY : WILMAR INTERNATIONAL LIMITED
RSPO MEMBERSHIP NO.: 2-0017-05-000-00

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

Certification Unit	Mill and Supply Base	GPS Location		Location
		Latitude	Longitude	
Saremas 1 Certification Unit (CU)	Saremas 1 POM	3°31'32.199"N	113°44'39.092"E	18 KM off KM 115, Bintulu – Miri Road, 97008, Bintulu Sarawak Malaysia
	Saremas 1 Estate	3°31'20.932"N	113°45'12.386"E	
	Suai Estate	3°35'43.549"N	113°44'10.349"E	

MAP : See Attachment 1

AUDIT DATE : 16-20 March 2020 **DURATION :** 18 auditor days

TYPE OF AUDIT : Annual Surveillance Audit No. Recertification Audit

STANDARD: MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

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

VALIDITY OF RSPO CERTIFICATE : 14 June 2015 – 13 June 2020

The following attachments form part of this report:

Non-conformity Report(s) List of additional site(s)

Report by Audit Team Leader

Acknowledgement by Client's Representative

Name : AMIR B BAHARI

Name : Foo Siew Theng

Signature :

Signature :

Date : 03/07/2020

Date : 07 July 2020

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SUMMARY OF AUDITS

Stage 2 audit / Recertification audit			
On-site audit date :	27-30/4/15	No. of auditor days:	15
Audit team :	Khairul Najwan B. Ahmad Jahari, Mohd Hafiz B. Mat Hussain, Valence Shem, Jagathesan a/l Suppiah, Ismail B. Ibrahim		
No. of major NCR :	2	Indicator: 4.7.2, 6.12.3	Closing date: 28/5/15
No. of minor NCR :	7	Indicator: 1.3.1, 4.8.2, 5.3.3, 5.4.1, 6.2.3, 6.8.3, 6.9.3	
Indicate the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers
	√	-	√
	Contract workers	NGOs	Govt. agency
	√	-	-
Indigenous people	Contractor	Others (Please specify)	
	-	√	-
Supply base sampled :	Saremas 1 Estate & Suai Estate		

Annual Surveillance Audit 1			
On-site audit date :	16 th – 20 th May 2016	No. of auditor days:	15
Audit team :	Mohd Hafiz Mat Hussain, Khairul Najwan Ahmad Jahari, Selvasingam T Kandiah, Zulkefli Haron		
No. of major NCR :	-	Indicator: -	Closing date :10/8/2016
No. of minor NCR :	2	Indicator: 2.1.3 and 6.1.4	
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers
	√	-	√
	Contract workers	NGOs	Govt. agency
	√	-	-
Indigenous people	Contractor	Others (Please specify)	
	-	√	√ UNiMAS (via phone call)
Supply base sampled :	Saremas 1 Estate and Saremas 2 Division 1 Estate		
Changes since the last audit :	No significant changes since last audit		

Annual Surveillance Audit 2			
On-site audit date :	10 – 13 April 2017	No. of auditor days:	16
Audit team :	Mohd Razman Salim, Mohd Ab Raouf Asis, Rahayu Zulkifli, Amir Bahari & Zulkarnain Abdullah		
No. of major NCR :	2	Indicator: 2.1.1 & 6.5.2	Closing date: 05 Jun 17
No. of minor NCR :	2	Indicator: 4.6.10 & 6.2.3	
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers
	√	-	√
	Contract workers	NGOs	Govt. agency
	√	-	-
Indigenous people	Contractor	Others (Please specify)	
	-	√	-
Supply base sampled :	Suai Estate & Saremas 1 Estate		
Changes since the last audit :	Since 1 February 2017, the Saremas 2 (Div. 1) Estate had been removed from this certification unit.		

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Annual Surveillance Audit 3			
On-site audit date :	2-5 April 2018	No. of auditor days :	16 Auditor Days
Audit team :	Mohd Zulfakar Kamaruzaman (LA), Mohd Ab Raouf Asis, Khairul Najwan Ahmad Jahari, Mohd Norddin Abdul Jalil.		
No. of major NCR :	1	Indicator: 4.7.3	Closing date: 2 July 2018
No. of minor NCR :	1	Indicator: 4.1.2	
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees	Settlers	Villagers / Local communities
	√		√
	Contract workers	NGOs	Govt. agency
	√		√ (Sarawak Forestry Dept.)
Indigenous people	Contractor	Others (Please specify)	
	√	√	
Supply base sampled :	Saremas 1 Estate and Suai Estate (100% sampling)		
Justification of audit planning	Total allocation of auditor days for Saremas 1 CU were: Mill = 4 days (3 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems) Saremas 1 & Suai Estate = 6 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification plus the verification of Unproductive area.		
Changes since the last audit	See notes provided in Table 1 - Summary of Information.		
Report approved by :	Radziah Mohd Daud	Approval date: 10 July 2018	

Annual Surveillance Audit 4			
On-site audit date :	9-12 April 2019	No. of auditor days:	16
Audit team :	Mohd Ab Raouf bin Asis (LA), Mohd Zulfakar bin Kamaruzaman (A), Dzulfiqar bin Azmi (A), Mohd Norddin Abdul Jalil (A).		
No. of major NCR :	4	Indicator: 4.3.4, 4.7.3, 6.1.2, 6.10.2	Closing date: 8/07/2019
No. of minor NCR :	6	Indicator: 2.2.2, 4.3.5, 5.6.3, 6.1.4, 6.2.3, 4.5.4 (Requirement for uncertified management unit)	
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees	Settlers	Villagers / Local communities
	/		/
	Contract workers	NGOs	Govt. agency
	/		/
Indigenous people	Contractors	Others (Please specify)	
	/	/	
Supply base sampled :	Saremas 1 POM, Saremas 1 Estate, Suai Estate		
Justification of audit planning	Total allocation of auditor days for Saremas 1 CU were: Mill = 4 days (3 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems) Saremas 1 & Suai Estate = 6 days each estate for verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification plus the verification of Unproductive area.		
Changes since the last audit	Saremas 1 certified area was reduced due to land acquisition by the government. 0.71 ha was allocated for Petronas pipeline gas.		
Report approved by :	Radziah Mohd Daud	Approval date: 15/07/2019	

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Recertification Audit 1			
On-site audit date	: 16-20 Mac 2020	No. of auditor days:	18
Audit team	: Amir B Bahari (LA) Mohd Ab Raouf Asis (A), Mohd Zulfakar Kamaruzaman (A), Mohd Norddin Abdul Jalil (A).		
No. of major NCR	: 3	Indicator: 6.7.3 / 5.5.2 / 7.12.4	Closing date: 3/06/2020
No. of minor NCR	: 6	Indicator: 2.2.3 / 6.7.4 / 6.5.3 / 1.1.5/ 7.12.7 / 3.3.2	
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees	Settlers	Villagers / Local communities
	/	/	/
	Contract workers	NGOs	Govt. agency
	Independent growers		
	Indigenous people	Contractors	Others (Please specify)
/	/		
Supply base sampled	: Saremas 1 POM, Saremas 1 Estate, Suai Estate		
Justification of audit planning	Total allocation of auditor days for Saremas 1 CU were: Mill = 5 days (4.0 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1.0 day for supply chain certification systems). Saremas 1 & Suai Estate = 6 days each estate (total 12) or verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification plus the verification of unproductive area. 1 day for the mill /estates remaining coverage.		
Changes since the last audit	: See notes provided in Table 1 - Summary of Information.		
Report approved by	: Kamini Sooriamoorthy	Approval date :	29/06/2020

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**SUMMARY OF INFORMATION
TABLE 1**

	RA 1	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	Mac 2020 – Feb 2021				March 2019 – February 2020
Certified FFB Processed /mt	181,883.33				179,083.33
Production of Certified CPO /mt	40,730.83				40,122.84
Production of Certified PK /mt	6,674.58				6,368.82
Certified Areas (Ha)	11,677.78				11,677.78
Planted Area (Ha) (Mature + Immature)	*9,253.01				9,284.92
Production Area (Ha) (Planted – Immature)	7,319.13				6,760.76
HCV Areas	324.95				324.95
REMARKS	<p>ASA04-2019 Saremas 1 certified area was reduced due to land acquisition 0.71 ha from government for Petronas Pipeline gas.</p> <p>RA-2020 *There being reduction of 31.91 ha between 2019 for the planted area, it was noted that there is some area classified as unproductive area by the management of Saremas 1. By their definition, the “unproductive area” (instead of declared as the unproductive area) was taken out from the total planted area for the purpose of budgeting the cost per ha (this has been practiced by the CU since certification).</p>				

TABLE 2

	PO	PK
Last years certified volume (MT)	40,122.84	6,368.82
Last year’s actual certified sold (MT)	30,795.81	5,571.62
Last year’s actual sold under other schemes (MT)	*6,820.39	0.00
Last year’s sold conventional (MT)	0.00	0.00
New year certified volume (MT)	40,730.83	6,674.58

*Scheme ISCC

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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 2014).

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Amir B Bahari	Lead Auditor, Occupational health and safety & Environment	Possessed B Sc (Hons) USM and Diploma Palm Oil Milling Technology/Management 1996 MPOB. Working experience for 35 years in the oil palm industry including in the mill and estates. A qualified RSPO P & C Auditor with experience in ISO, EMS and RSPO/MSPO auditing.
Mohd. Zulfakar Kamaruzaman	Auditor, Supply Chain, HCV	Holds a B.Sc. Forestry from UPM. He had several years of working experience in the oil palm operation. He is a qualified lead auditor for RSPO P&C and RSPO Supply Chain.
Mohd Ab Raouf bin Asis	Auditor Social	Holds B.Sc. (Hons) Management Technology Majoring Production and Operation from UTHM. He had several years of working experience in the oil palm operation. He is a qualified lead auditor for RSPO P&C and MSPO.
Mohd Norddin Abd Jalil	Auditor / Good Agricultural Practices	Holds a B.Sc.in Agriculture from Universiti Pertanian Malaysia. He has over 35 years working experience in the oil palm plantation operation. He is qualified auditor for RSPO P&C.

1.3 Audit methodology

The audit covered the Saremas 1 palm oil mill and two of its supply base. The sampling of the number of the supply base was using the formula of $0.8\sqrt{y}$. However, for this audit, 100% sampling was conducted where both supply bases were covered i.e. Saremas 1 Estate and Suai Estate. The audit included an on-site audit to the estates, mill, line site, local communities, contractors and suppliers to verify the implementation of the requirement of the RSPO certification system. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

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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 10/02/2020. In addition, SIRIM QAS International had also sent invitations through letters to the relevant stakeholders, including government agencies and Non-Governmental Organisations (NGOs). Stakeholder consultation was carried out during the on-site audit. In general, there was no negative comments made against this Certification Unit.

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

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (including migrant workers)	<p>The following were recorded during the conduct of audit as there was no evidence to prove otherwise:</p> <ul style="list-style-type: none"> a) All workers signed the employment agreements with the estates/mill. They understood the contents of agreement, as these were prepared in /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. b) 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. c) They have been getting salaries above RM1,100 since January 2019. Salaries are paid before the 7th of every month. d) No abuse at work, and no sexual harassment. They understand what constitutes sexual harassment. e) No discrimination between migrant workers and local workers, between male and female workers. f) Comfortable housing with water and electricity provided. g) Have access to affordable food from the canteen/sundry shops within the estate/mill premises. h) Entitled to free medical facilities at the estate clinic. i) Have representatives who attend regular meetings with the management where they can put forward any complaints and or raise any issues. Workers, including foreign workers get to appoint their own representatives. There is no interference of influence exerted by the employer. They are aware of the complaints form. They have used them to complaint about house defects. j) They knew the types of work offered at <i>Saremas 1 CU</i> (mill & estates) when they were in their countries of origin. k) All migrant workers keep their own passports. l) For newly-arrived foreign workers who do not understand Bahasa or English, translations are provided during briefings.
2) Settlers	Not available for this audit.
3) Villagers / Local communities (including women representatives, displaced communities)	Borders among others are with TR Golan, TR Sabang, TR Rantau & TR Clarien Damat Anak Minggin, are harmonious and cordial.
4) Suppliers	Suppliers are mainly for hardware and maintenance parts since the establishment of the CU. Fair dealings

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		with the units in Saremas 1 CU. Payments are made within 1 months of invoice.
5) Contract workers		At time of visit there were no contract workers
6) Local & national NGOs		Relevant NGO is WWF-Malaysia. No issues were raised / recorded. Relationship are harmonious and cordial. NGO i.e. SADIA is not in the list of stakeholders. NCR has been issued in indicator 1.1.5.
7) Government agencies / Statutory bodies		The Government Agencies are mainly related to statutory bodies e.g. MPOB, DOSH, DOE, NREB, JTK BOMBA, PDRM, Immigration Dept, Indonesian Consulate. No issues were raised / recorded. Relationship were harmonious and cordial.
8) Independent growers / Smallholders		The neighbouring estates are owned sister estates and Sime Darby Plantations. No issues were raised / recorded. Relationship are harmonious and cordial.
9) Indigenous people		Not available during this audit
10) Contractor		Significant no. of works in the Saremas 1 CU are managed within the Company resources. Delivery of FFB and CPO are handled through external vendors fleet of trailers and lorries. There were no issues raised / recorded. Signing of contract was with WIL Head Office. Contract terms are clear and fair.
11) Previous land owner (if any)		Not available for this audit.
12) Others (please specify)		Food facilities are managed by WIL. Each complex having separate complex facilities. Provision shops are available at the estates visited. No issues raised on the pricing and services.
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	
	<p>The Saremas 1 certification unit (CU) is under the Saremas Sdn. Bhd. (SSB), a wholly owned subsidiary of PPB Oil Palms Berhad (PPB Oil Palms). The CU comprised of the Saremas 1 Palm Oil Mill, Saremas 1 Estate and Suai Estate. All the estates are owned by PPB. The total combined land area of the two (2) estates is 11,677.78 ha of which 9,253.01 ha were planted with oil palm. The HCV area for Saremas 1 CU is 324.95 ha which come from Saremas 1 Estate (225.24 ha) and Suai Estate (99.71 ha). The Saremas1 POM has a mill capacity of 60 MT/hr.</p>	
2.2	Description of the Supply Base (including the planting profile)	
	<p>The FFB was sourced from company owned estates that were certified and small holders and small growers surrounding the Saremas 1 CU. Details of the FFB actual and projected contribution from each source to the mill are shown in the following tables. Details of the FFB actual and projected contribution from each source to the mill are shown in the following tables.</p>	

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

Estates	FFB Production	
	Tonnes	Percentage (%)
Saremas 1 Estate	94,414.90	43.83
Suai Estate	76,579.30	35.55
Total	170,994.20	-
Third party suppliers (non-certified)	44,413.90	20.62
Grand total	215,408.10	100.00

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

Estates	FFB Production	
	Tonnes	Percentage (%)
Saremas 1 Estate	96,800.00	40.55
Suai Estate	85,083.33	35.65
Total	181,883.33	
Third party suppliers (non-certified)	56,793.50	23.80
Grand total	238,676.83	100.00

**Table 3: Actual FFB received and CPO & PK dispatch by the Saremas 1 POM for the last
reporting period (Mac 2019 to Feb 2020)**

RSPO Supply Chain Model:	Total (MT)
Mass Balance	
FFB Received	215,408.10
FFB Processed	215,408.10
Certified FFB Processed	170,994.20
Non-certified FFB Processed	44,413.90
Crude Palm Oil (CPO)	
Overall CPO Production	47,113.59
Certified CPO Production (including opening stock of 1 Mar 2019)	37,849.78
Certified CPO delivered as RSPO	30,795.81
Certified CPO delivered as non-RSPO	0
Certified CPO delivered under other sustainable schemes	*6,820.39
Credits traded thru Book & Claim	0
Palm Kernel (PK)	
Overall PK Production	6,961.72
Certified PK Production (including opening stock of 1 Mar 2019)	5,669.13
Certified PK delivered as RSPO	5,571.62
Certified PK delivered as non-RSPO	0
Certified PK delivered under other sustainable schemes	0
Credits traded thru Book & Claim	0

*Scheme ISCC

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Table 4: Projected FFB received and CPO & PK dispatch by Saremas 1 POM of next reporting period (Mac 2020 to Feb 2021)

RSPO Supply Chain Model: Mass Balance	Total (MT)
FFB Received	238676.83
FFB Processed	238676.83
Certified FFB Processed	181,883.33
Non-certified FFB Processed	56,793.50
Crude Palm Oil (CPO)	
Overall CPO Production	53,480.20
Certified CPO Production	40,730.83
Certified CPO delivered as RSPO	-
Certified CPO delivered as non-RSPO	-
Certified CPO delivered under other sustainable schemes	-
Palm Kernel (PK)	
Overall PK Production	8,709.02
Certified PK Production	6,674.58
Certified PK delivered as RSPO	-
Certified PK delivered as non-RSPO	-
Certified PK delivered under other sustainable schemes	-

Table 5: Planted and certified area of the Saremas 1 CU

Estate	Planted (ha)	Certified (ha)
Saremas 1 Estate	4,578.38	6,007.88
Suai Estate	4,674.63	5,669.90
Total	9,253.01	11,677.78

Table 6 (a): Planting profile for Saremas 1 Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2010	2nd	Mature	882.62	19.28
2011	2nd	Mature	307.73	6.72
2012	2nd	Mature	813.35	17.76
2013	2nd	Mature	1083.4	23.67
2014	2nd	Mature	575.49	12.57
2017	2nd	Immature	372.38	8.13
2018	2nd	Immature	543.40	11.87
Total			4578.38	100.00

Table 7: Planting profile for Suai Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1998	2nd	Mature	321.29	6.87
1999	2nd	Mature	46.93	1.00
2000	2nd	Mature	295.91	6.33
2001	2nd	Mature	267.25	5.72
2002	2nd	Mature	271.86	5.82
2003	2nd	Mature	251.67	5.38
2004	2nd	Mature	222.55	4.76
2005	2nd	Mature	162.97	3.49
2006	2nd	Mature	75.62	1.62
2012	2nd	Mature	145.04	3.10
2014	2nd	Mature	419.83	8.98
2015	2nd	Mature	585.36	12.52

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2016	2nd	Mature	590.23	12.63
2017	2nd	Immature	482.28	10.32
2018	2nd	Immature	535.82	11.46
Total			4674.63	100.00

2.3 Organizational Information/Contact Person(s)

The details of the contact person are as shown below:

Name	:	Mr. Chang Sip Woon
Position	:	Assistant General Manager
Address	:	PPB Oil Palms Berhad Sarawak Operations, Lot 964, Sublot 7, Taman Seaview Commercial Centre, Jalan Tanjung Batu, P.O Box 730, 97008 Bintulu, Sarawak MALAYSIA
Phone no.	:	+ 60 85 325 713/+60 86 333 286
Fax no.	:	+ 60 85 495 010/+60 86 315 220 60 86 315 223/+60 86 315 221
Email	:	sipwoon.chang@my.wilmar-intl.com

3.0 AUDIT FINDINGS

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

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

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 :

All of the estates and mills belonged to PPB had been certified to RSPO P&C. However, Wilmar is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details provided in the Time Bound Plan described in Attachment 6.

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?

N.A

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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 Not applicable.
There were no associated smallholders supplying FFB to the CU.

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

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

No

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)

There were no complaints from the stakeholders as recorded.

4.0 DETAILS OF NON-CONFORMITY REPORT

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

Total no. of minor NCR(s) = List : 2.2.3, 6.7.4, 6.5.3, 1.1.5, 7.12.7, 3.3.2
(details refer to Attachment 4)

Total no. of major NCR(s) = List : 6.7.3, 5.5.2, 7.12.4
(details refer to Attachment 4)

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

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

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

5.0 AUDIT CONCLUSION

The audit team concludes that the organization has / ~~has not~~* established and maintained its management system in line with the RSPO P&C requirements of the standard and demonstrated the ability of the system to systematically achieve agreed criterion & requirements.

6.0 RECOMMENDATION

No NCR recorded. Recommended to continue certification.

Minor NCR(s) recorded. Corrective action plan has been accepted. Verification of the NCR(s) to be carried out in the next audit.

Note: Minor NCRs raised in the audit which are not addressed in the subsequent audit shall be upgraded to major NCRs.

Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided and accepted by the audit team. The NCR(s) have been satisfactorily closed out.

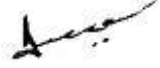
Recommended to continue certification.

Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s)..... have not been satisfactorily closed out within 60 days of the audit. Recommended for suspension of the certificate.

Note: Major NCRs which are not addressed within a further 60 days shall result in the certificate being withdrawn.

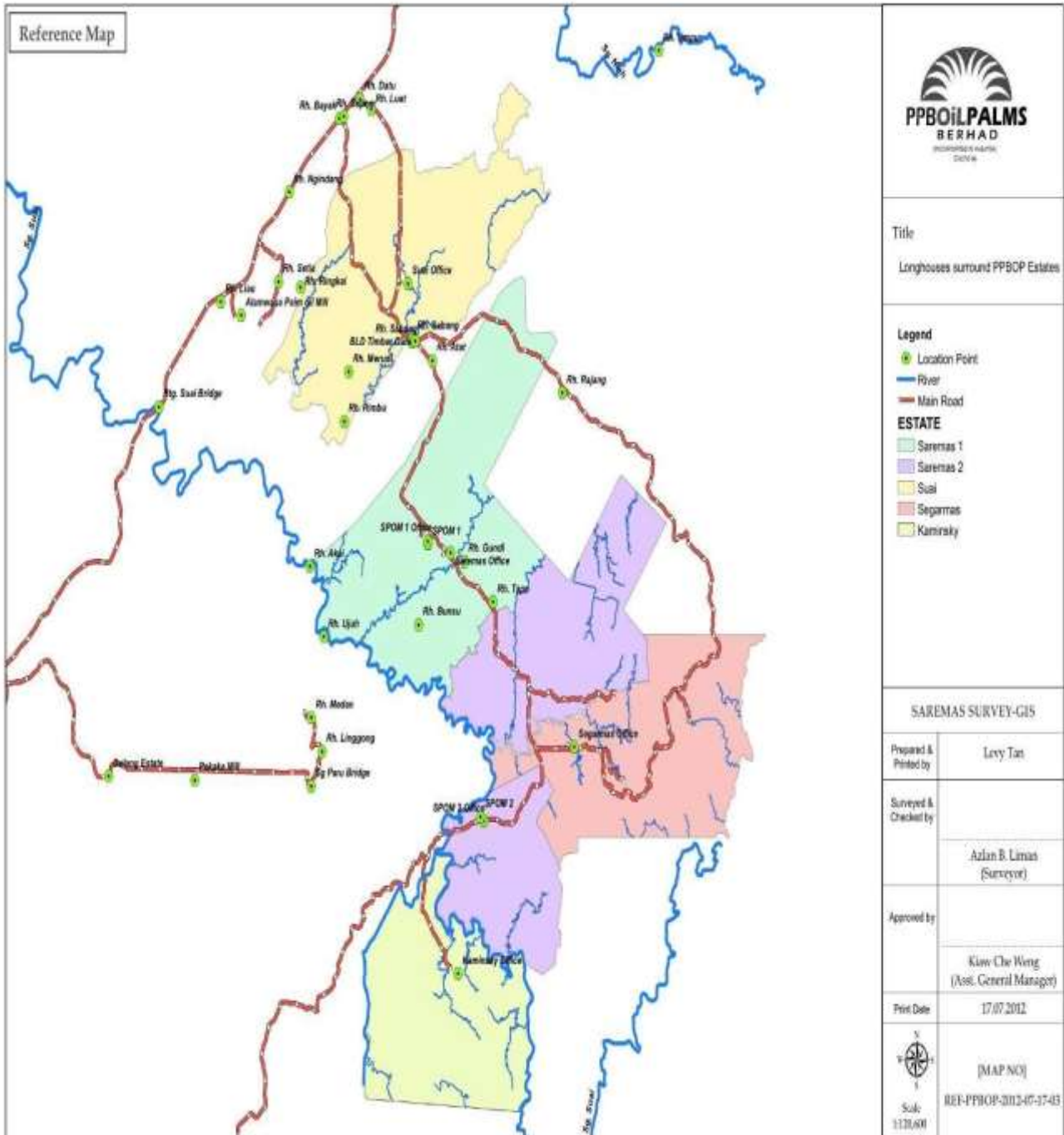
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7.0 IT IS CONFIRMED THAT ALL CORRECTIVE ACTIONS TAKEN ON MAJOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED, ACCEPTED AND VERIFIED AND ALL CORRECTIVE ACTIONS PLANS PROVIDED ON MINOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED AND ACCEPTED.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

Audit Team Leader :	AMIR B BAHARI		03/6/2020
	_____	_____	_____
	(Name)	(Signature)	(Date)

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Attachment 1 – Map



RSPO Recertification Audit Plan

1. Objectives

The objectives of the audit are as follows:

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

2. Date of assessment : 16-20 Mac 2020

3. Site of assessment : Saremas 1 Certification Unit

- Saremas 1 Palm Oil Mill
- Suai Estate
- Saremas 1 Estate

4. Reference Standard:

- a) RSPO P&C 2018 (MYNI:2019)
- b) RSPO Certification Systems June 2017
- c) RSPO Supply Chain Certification Standard 2017
- d) Company's audit criteria including Company's Manual/Procedures

5. Assessment Team

- a) Lead Auditor : AMIR B BAHARI (Best Practices (Estate/Mill) GHG Mill)
- b) Auditors : MOHD ZULFAKAR KAMARUZAMAN HCV Estate, Mill SC, TBP
: NOORDIN ABD JALIL (Environmental, Safety, Health (Mill/Estate))
: MOHD AB RAOUF ASIS (Social (Estate/Mill))

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.

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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

10. 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.

11. 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

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12. Assessment Programme Details : As below

Date / Time	Coverage of assessment / Activity / Site	MZK	HAHB	MAR	MNAJ
Day 1-16/3/20 8.30am – 9.15am	Opening Meeting – Venue: Saremas 1 Estate <ul style="list-style-type: none"> Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programs Organization Representative - Briefing RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases , Time bound plan, uncertified management unit Actions taken to address previous audit findings. 	/	/	-	/
9.15am – 12.30pm	Site observation to Saremas 1 Estate P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Land Titles / Boundaries IPM New planting - Environmental management, waste & chemical management HCV/RTE 	/	/	-	/
12.30pm – 1.30pm	Lunch Break				
1.30pm – 5.00pm	Continue assessment at respective sites	/	/	-	/
Date / Time	Coverage of assessment / Activity / Site	MZK	HAHB	MAR	MNAJ
Day 2 – 17/3/20 8.30am – 12.30pm	Site observation to Suai Estate P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Occupational safety & health aspects, chemical management Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, IPM New planting - Environmental management, waste & chemical management HCV/RTE 	/	/	/	/
12.30pm – 1.30pm	Lunch Break				
1.30pm – 5.00pm	Continue assessment at respective site	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	MZK	HAHB	MAR	MNAJ
Day 3 – 18/3/20 8.30am – 12.30pm	Site observation to Suai / Saremas Estate P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Occupational safety & health aspects, chemical management Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, IPM New planting - Environmental management, waste & chemical management HCV/RTE 	-	/	/	/
	Site observation at Saremas Mill P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> Environment, Occupational safety & health aspects, chemical management Laws and regulations Interview with workers, contractors etc. Milling Practice - Mill processes ramp to despatches Social aspects -SIA, management plan & implementation, workers' quarters, 	/	-	-	-

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	<ul style="list-style-type: none"> Stakeholder consultation with affected communities surrounding the mill Interview with gender committee, safety committee, worker representative, contractors, supplier, etc 				
12.30pm – 1.30pm	Lunch Break				
1.30pm – 5.00pm	Continue assessment at respective site	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	MZK	HAHB	MAR	MNAJ
Day 4 – 19/3/20 9.15am – 12.30pm	Saremas 1 Mill RSPO Supply Chain 2017 <ul style="list-style-type: none"> RSPO Supply chain standard implementation including model requirements Site observation at Saremas 1 Mill P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> Environment, Occupational safety & health aspects, chemical management Laws and regulations Interview with workers, contractors etc. Milling Practice - Mill processes ramp to despatches Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the mill Interview with gender committee, safety committee, worker representative, contractors, supplier, etc 	/	/	/	/
12.30pm – 1.30pm	Lunch Break				
1.30pm – 5.00pm	Continue assessment at respective sites	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	MZK	HAHB	MAR	MNAJ
Day 5 – 20/3/20 8.30am – 12.30pm	Saremas 1 Mill RSPO Supply Chain 2017 <ul style="list-style-type: none"> RSPO Supply chain standard implementation including model requirements Site observation at Saremas 1 Mill P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> Environment, Occupational safety & health aspects, chemical management Laws and regulations Interview with workers, contractors etc. Milling Practice - Mill processes ramp to despatches Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the mill Interview with gender committee, safety committee, worker representative, contractors, supplier, etc 	/	-	-	-
Day 5 – 20/3/20 8.30am – 12.30pm	Continue site observation at respective sites (to be advised at site) P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Occupational safety & health aspects, chemical management Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, IPM New planting - Environmental management, waste & chemical management HCV/RTE 		/	/	-
12.30pm – 1.30 pm	Lunch Break				
2.30pm –3.00pm	Continue assessment at respective site	/	/	/	-
3.00 pm – 4.00 pm	Audit Team Discussion	/	/	/	-
4.00pm – 5.00pm	Closing meeting – Saremas 1 Estate	/	/	/	-

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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	The CU had continued to maintain a comprehensive system with respect to this criterion. Records of complaint and grievances were made available. Details of complaints and grievances for Suai and Saremas 1 Estates were recorded in the Complaint Form, Request Form and Public Information Request (PIR) Form. In Saremas 1 CU, the management documents relating to environment, social and legal issues, are made available to the public except for those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	Yes	The estates and mill had identified personnel responsible for complaints. Records of communication were identified and maintained.
	1.1.3 (C) Records of requests for information and responses are maintained.	Yes	Saremas 1 CU had continued to maintain a comprehensive system with respect to this criterion. Request Form for their stakeholders or other interested party who had viewed / obtained document related to RSPO and Record of Visitation by government agencies such as DOE and DOSH were maintained.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	Yes	A document–Consultation and Communication Procedure was established and prepared by the RSPO Unit of PPB Oil Palms Bhd. This procedure is used by the CU in handling internal and external communications. In general, the CU has followed the procedure in responding to internal and external communications
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	No	The current list of contact and details of certain stakeholders and their nominated representatives was not available. Suai Estate and Saremas 1 Estate did not have NGO i.e. SADIA in their list of stakeholders. <i>Hence an NCR MAR 01 2020 minor is raised.</i>
1.2 The unit of certification commits to ethical conduct in all business	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	Yes	The Saremas Group has established a Code of Ethical Conduct which comprises of 3 (three) main principles: a) Avoiding conflict of interest b) Avoiding misuse and/or abuse of position c) Ensuring confidentiality of information and preventing misuse of information

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Clause	Indicators	Comply Yes/No	Findings
operations and transactions.	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	Yes	In addition, Wilmar also has a statement of COBC in all their contract with the contractors. The contracts apply to all its suppliers, consultants, agents, contractors /service providers whom have direct dealings with the Group.

Principle 2: Operate legally and respect rights

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

Clause	Indicators	Comply Yes/No	Findings
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	Saremas 1 CU has continued to comply with all applicable local, national and ratified international laws and regulations. List of applicable legal and other requirements titled " <i>Register of Legal and Other Applicable Requirement for Wilmar International Ltd</i> " was made available during the audit.
	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	The CU has established a Legal Register. The list of applicable legal and other requirements titled <i>Register of Legal and Other Applicable Requirement for Wilmar International Ltd</i> was made available during the audit. The CU appointed the Senior Sustainability Manager and the Manager in the same unit for the overall responsibility in the legal update and compliance.
	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	The Estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the estates, during the field inspection confirmed that they were clearly marked and maintained. All the physical markers/boundary stones along the legal boundaries between was visibly available.
2.2 All contractors providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.1 A list of contracted parties is maintained.	Yes	The general stakeholder lists dated January 2020 for Saremas 1 Estate, Suai Estate and Saremas 1 Palm Oil Mill were available, maintained and updated except for the non-conformity as highlighted in 1.1.5 above. The list of stakeholders includes suppliers, contractors, government agencies/service provider, neighboring estates and local communities.
	2.2.2 All contracts, incl. those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the 3 rd party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed / accredited) for migrant workers, service providers C& labour contractors, is available.	Yes	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements as verified through Online Vendor Registration (OVR) and the Vendor Code of Business Conduct (VCOBC) which apply to all contractors for due diligence and meeting legal requirements. Evidence of legal due diligence of all contracted third parties, service providers and labour contractors, were clearly stated in contract between WIL and all contractors.

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Clause	Indicators	Comply Yes/No	Findings
	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.	No	<i>Saremas 1 POM</i> - All contracts, including those for FFB supply, contain specific clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection as verified through Online Supplier Registration (OSR) and the Supplier Code of Conduct (SCOC) which apply to all contractors for due diligence and meeting legal requirements. However, the contracts in Suai Estate and Saremas 1 Estate did not contain clauses disallowing child, forced and trafficked labour. <i>Hence an NCR MAR 02 2020 minor is raised.</i>
2.3 All FFB supplies from outside the unit of certification are from legal sources.	2.3.1 (C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> 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 	Yes	The evidence of currently document in draft is available in the 'Smallholder Mapping'. At present the mill only possessed the valid MPOB licenses for all the directly source FFB as verified by the auditor. RSPO has provided the timeline which is 1 year from date of launch of MYNI for the mill to obtain and compile the information above.
	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.	Yes	Presently in Saremas 1 POM there is no practice of indirectly source of FFB. All FFB are received direct from the suppliers. All the information in relation are the same as provided in indicator 2.3.1

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	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	The mill has a business plan prepared annually in the form of year budget and the projection for 5 years prepared as guidance for future planning. The business plan among others contains; FFB yield & CPO production forecast, Extraction Ratios – OER / KER, Cost of production, EVIT running accounts and CAPEX. Similarly, all the two estates audited possessed a similar budget format. Inclusive there is also a 5-year budget/forecast financial plan 2020-2024 allocating categories among others; Crop yielding area, Mature cost, General charges/upkeep/collection/depreciation, Cost/ha & cost /mt FFB and CAPEX.

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Clause	Indicators	Comply Yes/No	Findings
financial viability.	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	Yes	The replanting programmes until 2024 were sighted for both estates. This programme was reviewed once a year and is incorporated in their annual financial budget.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	Yes	Several meetings to discuss on issues related to sustainability such as Saremas 1 Mill meeting (mill and its supply bases), were conducted in Jan 2020, Estate meeting (estates within Saremas 1) and operation meeting (estate manager and estate key personnel) were held for effective implementation of RSPO. The minutes of meeting were established for all relevant meetings. All the NCRs raised will be closed prior to the external audit.
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 management documents in relation to environmental plans and impact assessments implemented by the CU were made available and maintained at all audited operating units.
	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	This indicator is not applicable.
3.3 Operating procedures are appropriately documented, consistently implemented and monitored.	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	Yes	Saremas 1 CU continued to use the established manuals among others; a) Wilmar International Limited 2011 Agriculture Manual & Standard Operating Procedure for Oil Palm, Safety and Health Manual, b) SOP <i>Prosedur Operasi Kerja Selamat dan Standard Sektor Perladangan</i> . c) The Agriculture Manual.
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	No	Saremas 1 CU continued to implement the mechanism to ensure consistent implementation of operation as per SOPs. During the site visit, the store SOP Ref SPOM1-SSOP-025 was not effectively implemented. Saremas 1 Mill – The general store office housekeeping / waste management was not maintained effectively. <i>Hence an NCR HAHB 02 2020 Minor is raised.</i>
	3.3.3 Records of monitoring and any actions taken are maintained and available.	Yes	The estates maintained relevant records on implementation and monitoring of Agriculture Manual etc at the CU.
3.4 A comprehensive Social and Environmental	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory	Yes	The SIA Assessment Report for Saremas 1 CU entitled “Scoping SIA Saremas 1 and 2, Segarmas and Kaminsky Estates” was prepared in 2008. The replanting activities has started since 2016 and as for the audit on 2020 the assessment for replanting in 2019 has been made on May 2019 and a report has been available.

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Clause	Indicators	Comply Yes/No	Findings
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.	methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.		
	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	There was evidence that the assessment has been done with the participation of the affected parties as shown by the issues raised by the different stakeholders during various stakeholder consultations. The plans and impact assessments relating to environmental impacts based on documents for both estates and the mill are elaborated in the following records. The main purpose of for this assessment was to evaluate and analyse impact on soil, water, and air associated with the organization activities. Among environment aspects assessed were agrochemical applications, land and water contamination from hazardous material and farm vehicles, human settlement disturbance and abandonment areas.
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	Yes	The mill monitors aspects and impacts among others the following activities. This plan is available and similar to the reduction of pollution and emission. Mainly the areas relating to significant impact to the environment and the effort implemented are summarised in the table and made available during audit for review. The social and environmental management and monitoring plan were reviewed at least once a year with participation of its stakeholders also included the process to legalize dependents and their children.
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	The employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives. Employment procedures which include recruitment, selection and hiring are contained in a document entitled Recruitment of Workers. For matters related to termination of employment and retirement, these are contained in employment contracts, which are available to workers and their representatives. Clause 2 of the employment contract states that retirement age for workers is 60.
	3.5.2 Employment procedures are implemented, and records are maintained.	Yes	The employment procedures were implemented and records were maintained. The audit team has verified all new recruitment workers from Indonesia through the personal file by a) employment no./ name of employee, b) employment contract / offer letter, c) passport consent form / etc.
3.6 An OH 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	Both the estates and the mill had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	Yes	The effectiveness of the Group Health and Safety Plan is made through the following mechanism : Occupational Safety Health (OSH) Committee established, Findings during the quarterly meetings, The OSH committee organisation chart, ESH program etc

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Clause	Indicators	Comply Yes/No	Findings
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	The training program for 2020 covering all aspects of the RSPO Principles and Criteria and other essential operations activities has been established. Regular assessments of training needs were available and verified. Training needs identification matrix has been established with target dates for of implementation.
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	Yes	Records were maintained to include date, subject the trainer and the categories of employees trained. Inclusive is the no and venue of the training session held by the management.
	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	Training has been conducted in Aug 2019 by internal trainers for a group of 12 personnel. They represent sections from the Security, Weighbridge Clerk, Supervisors, and PIC in relation to the related to SCCS dealings and requirement. In addition, a Training Plan for the year 2020 has been developed and formalised. Records were sighted and verified.

SUPPLY CHAIN REQUIREMENTS FOR MILLS

Disclaimer text: The following section is taken verbatim from the RSPO Supply Chain Certification Standard (14 June 2017) (RSPO SCCS), general requirements as well as modules D & E for mills. The RSPO SCCS is the document in vigour for these requirements and should be referred to in any cases of uncertainty. Any references to other modules or sections contained in the table below, refer to the RSPO SCCS document. As per RSPO SCCS, **all requirements are major Indicators** (i.e. **equivalent of critical Indicators in P&C 2018**).

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
Definition Identity Preserved Mill D.1	A mill is deemed to be IP if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO P&C, or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical	NA	This is not applicable since this mill is Mass Balance.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.		
Definition Mass Balance Mill E.1	Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	Yes	Saremas 1 POM received certified FFB from own Estate which is Saremas 1 Estate, Suai Estate and uncertified FFB from surrounding small growers & small holders.
Explanation (Volume and product integrity) D.2 E.2	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products shall be recorded in the RSPO IT platform, supply chain certificate and public summary audit 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. The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (PalmTrace).	Yes	The information has been made available during the conduct of audit. The values are as provided in Table 4 in this report.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
<p>Documented procedures 5.3.1 D.3 E.3</p>	<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"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). • 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. • The site shall have documented procedures for receiving and processing certified and non-certified FFBs. 	<p style="text-align: center;">Yes</p>	<p>Saremas 1 procedure dated 1 February 2020 (Saremas 1 POM RSPO – SCC) describing the procedures on the following activities related on its supply chain certification standard required by the RSPO.</p> <p>The auditor sighted CPO and PK production record, weighbridge report, dispatch record and training record was up to date and well maintained. Sighted last training on SCCS in Dec 2019.</p> <p>The appointment letter dated March 2019 assigned the Mill Manager as PIC (person in charge). Training was conducted in Aug 2019 by the internal trainers.</p> <p>Saremas 1 POM has implemented Clause 13. Supply Chain Model – Mass Balance (MB) <i>RSPO Supply Chain Certification procedure d</i> for receiving and processing certified and non-certified FFBs. Saremas 1 POM has received non certified FFB which is surrounding small growers and small holders.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
Internal Audit 5.3.2	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <p>Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <ul style="list-style-type: none"> • Effectively implements and maintains the standard requirements within its organisation. • 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 management review at least annually. The organisation shall be able to maintain the internal audit records and reports. 	Yes	The Supply Chain Procedure was available in Saremas 1 POM RSPO – SCC, including a specific procedure for Internal Audit. The conduct of audit is in compliance with the established procedure.
Purchasing Goods In 5.4 D.4.1/ D.4.2 D.4.1/E.4.2	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	Yes	Available. Based on inventory record there was no overproduction for CSPO and CSPK from period March 2019 to 18 Feb 2020

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
Outsourcing Activities 5.5	<p>5.5.1 In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO SCCS. A CPO mill and independent mill cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organisation (not the tank farm manager).</p>	Yes	<p>There was no outsource activities except for the CPO and PK transportation involving vendors. The agreement documents were available and communication on the RSPO supply chain requirement were transacted to them. Record of training was sighted during the signing of agreement dated 2/1/20.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>5.5.2 Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a) The site has legal ownership of all input material to be included in outsourced processes;</p> <p>b) The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all info, when this is announced in advance.</p>	No	<p>Saremas 1 mill has outsourced the transportation of certified CPO and certified PK to the vendors. An agreement covering the outsources activity were sighted. It has been noted that the meeting that highlighted the information on the implementation of RSPO standard and training were also carried out during signing of contract with management.</p> <p>There are no explicit procedures for the outsourced process. There is a supply chain procedure in file, Saremas 1 POM RSPO – SCC. However, there is no explicit procedures for the outsourced process. <i>Thus Major NCR MZK 01 2020 has been raised.</i></p>
	<p>5.5.3 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.</p>	Yes	<p>The list of contact person for transporters was made available and up-to-date in the List of Self Declaration for Transporter.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	5.5.4 The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or 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.
Record keeping 5.9	5.9.1 The organisation shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO SCCS requirements.	Yes	Sighted CPO and PK delivery note, weighbridge ticket, production data, internal audit and management review records were found up-to-date.
	5.9.2 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 for a minimum for 2 years refer to RSPO Supply Chain Certification Procedure SKPOM-RSPO-SCC. Sample CPO dispatch note since Jan 2015 until to date was available and well maintained.
	5.9.3 The organisation shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of 12 months.	Yes	Available.
D.5.1	The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	Yes	This is not applicable since this mill is a MB mill.
E.5.1	a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of palm oil and palm kernel oil that are delivered	Yes	Available.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>The site can only deliver MB sales from a positive stock. Positive stock can include product ordered for delivery within 3 months. However, a site is allowed to sell short i.e. product can be sold before it is in stock.</p>		
Conversion Factors 5.10	<p>5.10.2 Where applicable, a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organisations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org).</p>	Yes	Saremas 1 POM processed all the received crop & their processing output will be based on their actual Oil Extraction Rate (OER) as well as Kernel Extraction Rate (KER).
	<p>5.10.2 Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.</p>		
Processing D.6	<p>The site 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 product including during transport and storage to strive for 100% separation.</p>	NA	Not applicable since Saremas 1 POM is Mass Balance Mill.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
Sales and goods out 5.6	<p>5.6.1 The supplying site shall ensure that the following minimum info for RSPO certified products is made available in document form: The name and address of the buyer/seller;</p> <ul style="list-style-type: none"> • The loading or shipment / delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number. • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification doc). For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. 	Yes	The documented procedures related to sales and goods out were sighted and found adequate. The requirement of sales & goods out especially on notation of applicable Supply Chain model & Certificate number being complied by indicating in weighbridge dispatch ticket.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
Registration of Transactions 5.7	<p>5.7.1 Supply chain actors who:</p> <ul style="list-style-type: none"> • are mills, traders, crushers and refineries; and • take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. 	Yes	The registration of transaction being carried out by Wilmar Marketing subordinate.
	<p>5.7.2 The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <p>Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform.</p>		
	<p>The declaration time to do Shipping Announcement / Announcement is based on members' own standard operating procedures.</p> <p>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</p> <p>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or</p>		

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	damage shall be removed. Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.		
Claims 5.11	5.11.1 The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications & Claims.	Yes	Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. Saremas 1 POM has not use RSPO corporate logo as well as trademark logo

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 Cert. 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.	Yes	The Group Policy Titled <i>Human Right Policy</i> available. The policy was signed by both Chairman and CEO of Wilmar. The policy had a translation in Bahasa Malaysia. It is displayed on a notice board in office and at muster ground.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	Yes	It has been verified that the Saremas 1 POM does not instigate violence or use any form of harassment in the complex. The Law of Malaysia also prohibit the use of mercenaries and paramilitaries in all Palm Oil operations.
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is	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	Yes	In the event of a dispute, the CU will manage it through the "Dispute and Grievances Procedure". There is also the "Whistle Blowing Policy". The Dispute and Grievance Procedure commences with the receipt of complaint from any party, its investigation, proposed solutions and acceptance of the solutions or otherwise. If the proposed solution was rejected, the dispute will be brought for third party arbitration.

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Clause	Indicators	Comply Yes/No	Findings
implemented and accepted by all affected parties.	intimidation and follows the RSPO policy on respect for HRD.		
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	Yes	Based on interview with stakeholders, the system was understood by the affected parties.
	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	Saremas 1 CU keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders through stakeholders meeting at Saremas 1 POM.
	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	In the event of a dispute, the CU will manage it through the “Dispute and Grievances Procedure”. Additionally, there is also the “Whistle Blowing Policy” as the conflict resolution mechanism.
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	Contributions made to local development were made based on the requests from the local communities.
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.	4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through an FPIC process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available.	Yes	The copies of legal ownership of the land for both Saremas 1 & Suai Estates were verified. The land was bought from Sarawak Government on 1983 and 1985, respectively. It has been confirmed during the sale of the land that there was no history of customary land tenure or recognized NCR land. These were confirmed with the Miri Lands and Survey.
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:		

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Clause	Indicators	Comply Yes/No	Findings
	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.		There are currently two existing disputes. Further details reported in the confidential version of this report.
	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.		
	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 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 (incl. neighboring communities where applicable, and relevant authorities).	Yes	At Suai Estate, three individuals from the neighbouring land has sought clarification on the actual boundary between Block 106 Suai Estate that separates oil palm trees that they planted, and those planted by the estate. Further details available in the confidential version of this report. In 2020, there is no extended claim made by the stakeholder.
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	Yes	All relevant information at the Saremas 1 Estate, Saremas 1 Palm Oil Mill and Suai Estate are made available in appropriate forms and languages.

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Clause	Indicators	Comply Yes/No	Findings
	4.4.5 (C) Evidence is available to show that communities are represented through institutions or reps of their own choosing, incl. by legal counsel if they so choose.	Yes	There was evidence that in the two land disputes involving Saremas Sdn Bhd, that the Ibans and Penans were able and free to choose their own representatives to represent their claim and interests in the land disputes.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	Yes	There are currently two existing disputes. Further details reported in the confidential version of this report.
4.5 No new plantings are established on local peoples' land where 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.	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 Saremas 1 CU and land title, there was no new plantings are established on local peoples' land.
	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.	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is legitimately owned by Wilmar Saremas 1 CU since 1983 and 1985. From the interviews, it can be concluded that there was no evidence of any new land clearing and new land dispute at Saremas 1 CU.
	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.	Yes	As above.

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Clause	Indicators	Comply Yes/No	Findings
	4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	Yes	As above.
	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 above.
	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 above.
	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	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	In the event of a dispute, the CU will manage it through the “Dispute and Grievances Procedure”. 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	Yes	In accordance with the ‘Dispute and Grievances Procedure’, 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 at mill and visited estates.

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Clause	Indicators	Comply Yes/No	Findings
indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.		
	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 Saremas 1 Estate. The Fresh Fruit Bunches are supplied from Wilmar owned estates which are certified to RSPO and surrounding independent smallholder/Villagers.
	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	All relevant information at the Saremas 1 Estate, Saremas 1 Palm Oil Mill and Suai Estate are made available in appropriate forms and languages. The following relevant documents were made available in Bahasa Malaysia, which is a language that every party was conversant in, were made available, sighted and verified during the audit.
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	In the event of a dispute, the CU will manage it through the "Dispute and Grievances Procedure". 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	In accordance with the 'Dispute and Grievances Procedure', the procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established.
	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 Wilmar Saremas 1 CU since 1983 and 1985. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no new 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 people 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 people 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 Wilmar Saremas 1 CU since 1983 and 1985. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no new issues regarding land with villagers, local community and neighbouring estate. However, currently there are two existing disputes. Further details are available in the confidential version of this report.

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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 (see Criteria 4.2 and 4.6) 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 mechanisms.	Yes	There are currently two existing disputes. Further details are available in the confidential version of this report.
	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 requirements.	Yes	There are currently two existing disputes. Further details are available in the confidential version of this report.
	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	<p>At Suai Estate, three individuals from the neighboring land (namely Kaunselor Bakron bin Suat, En Simon anak Jobi, and En Samshuddin bin Bakron) sought clarification on the actual boundary between Block 106 Suai Estate that separates oil palm trees that they planted, and those planted by the estate.</p> <ul style="list-style-type: none"> a) On 4 November 2016, a boundary verification exercise was carried out in the presence of the 3 land owners and 5 estate representatives. b) The boundary pegs by Land Survey Department were located and identified using GPS coordinates, which both parties acknowledged and agreed to abide by. <p>As for the Recertification audit in 2020 there is no extended claim made by the stakeholder.</p>

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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 (Independent and Scheme) and other local businesses.	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	Yes	During the audit, it was verified that the current and past prices for FFB (year 2016, year 2017 until Jan 2019 – March 2020) is being displayed at the notice board near the Saremas 1 Palm Oil Mill weighbridge.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Yes	There is evidence that Saremas 1 regularly explains the FFB Pricing to Smallholders. The stakeholder information briefing concerned to FFB qualities, FFB grading, calculation payment by MPOB, oil extraction rate (OER). The calculation method of pricing was made known and given to the Smallholders. Field days were organised monthly by the mill to all the small holders from the supplying list.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Yes	In Saremas 1 POM Price for FFB adopted the MPOB Pricing. All prices are calculated by the MPOB and the mill uses the price and follows the MPOB guidelines.
	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	There is no contract/bound for FFB outside supplier sending crop to the Saremas 1 POM. The Suppliers are free to choose the mill choice of theirs.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	Yes	Contract with suppliers were drafted in the English language, which is understood by the suppliers, as verified during interviews.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	Yes	All contractor confirmed that payments were received within a reasonable timeframe which is 7-10 days after submission of invoice. And receipts contain specifying price, weight, deductions and amount paid are given.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	Yes	Weighing Equipment in Saremas 1POM has been calibrated on a yearly basis using Metrology Corporation Malaysia Sdn Bhd last made in Feb 2020.

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Clause	Indicators	Comply Yes/No	Findings
	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	Wilmar 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. However, the Growers and villagers were not in favor in the implementation due to high cost.
	5.1.9 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	Yes	There is a document namely "Dispute and Resolution Procedure" and the Whistleblowing Policy to ensure anonymity. Annex 1 of the Policy contains the Whistle Blower Complaint Response where the complainant has the option of remaining anonymous by not revealing his/her identity.
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	Wilmar 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. However, the Growers and villagers were not in favor in the implementation due to high cost.
	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	Wilmar 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. However, the Growers and villagers were not in favor in the implementation due to high cost.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	Yes	Wilmar 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. However, the Growers and villagers were not in favor in the implementation due to high cost.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	Yes	Wilmar 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. However, the Growers and villagers were not in favor in the implementation due to high cost.

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Clause	Indicators	Comply Yes/No	Findings
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	Yes	Currently Wilmar has created a system to trace their stakeholder around their estates. But so far growers and smallholders in Sabah are willing to join the WAGS to get certification but for smallholder in Sarawak doesn't want to involve because of financial restriction. But Wilmar do have a report and always publicly available in their website.

Principle 6: Respect workers' rights and conditions

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

Clause	Indicators	Comply Yes/No	Findings
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	This Group policy is available namely Equal Opportunity Policy signed and endorsed by both Group Plantation Head and the Group CSR Head. The policy is publicly displayed in the visited estates and mill. The Policy is affected to mainly the employees of both gender and also employees of contractors as service provider to the estates/mill. The HR Department is responsible for the effective enforcement of the Policy.
	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	Apart from the Equal Opportunity Policy which states that all employees shall be treated equally, there is also no evidence that there has been any form of discrimination against any employee, or group of employees.
	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	Currently, there was no pregnant women at Saremas 1 as verified with medical assistant and during interview session with women workers. If there are any pregnant women found by management or informed by staff and workers, the management of estate and mill will transfer the pregnant worker to do any light job as per stated in the Social Policy states that all employees shall be treated equally. There is also no evidence of discrimination against any employee, or group of employees including pregnant women.

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Clause	Indicators	Comply Yes/No	Findings
	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	At the Saremas 1 POM, Gender Committee was formed since 2008. A gender committee is in place throughout all the production units within Saremas 1 CU. The gender committee comprises female employees of all levels, including wives of male employees. Among the activities carried out by the Gender Committee include training on sexual harassment, reproductive rights and opportunities to improve members' income. Sampled was a Gender Committee awareness briefing held attended by all Gender Committee members of Saremas 1 CU.
	6.1.6 There is evidence of equal pay for the same work scope.	Yes	The equal opportunities policy is described within the Equal Opportunity Policy, which states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age.
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 (English or Bahasa Malaysia) and explained to them in language they understand.	Yes	For the Saremas Group, documentation of pay and conditions are mentioned in the workers' contract of employment.
	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	Contracts and conditions of employment are contained in employment contracts signed between the Mill and respective estates on one hand, and their workers on the other.
	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	The Saremas 1 POM has complied with legal requirements on regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and	Yes	Housing inspections were carried out on weekly basis by members of the health and safety committee as required under Section 23(2) of the Workers' Minimum Standard of Housing and Amenities Act 1990.

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Clause	Indicators	Comply Yes/No	Findings
	welfare amenities to national standards or above, where no such public facilities are 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 (5 years) is allowed to upgrade the infrastructure.		
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	Yes	There are five sundry shops available within the Saremas 1 CU.
	<p>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.</p> <p>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:</p> <ul style="list-style-type: none"> • An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers. • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be 	Yes	Based on pay slip verified, all sampled workers whom complete the number of days offered in a month received at least minimum wages applicable, which is RM 1,100.00 per month or more. Suai Estate, Saremas 1 Estate and Saremas 1 Mill 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. The auditor had verified the calculation and though the calculation was in line with RSPO Guidance on Calculationg Prevailing Wages.

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Clause	Indicators	Comply Yes/No	Findings
	<p>used as the foundation for the gradual implementation of the living wage payment.</p> <ul style="list-style-type: none"> 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 <p>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.</p>		
	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 workers in Saremas 1 CU is a Permanent and full time workers and all the workers used for core work such as Harvesting, Manuring, Spraying, Milling Operation, Grading, Engine driver and workshop. There is no temporary workers and contractors use in the Saremas 1 CU.
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 association and collective bargaining are restricted under law, the employer facilitates parallel means of ind. 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	A written statement is available in “ <i>Human Right Policy</i> ” updated in January 2018 signed and endorsed by the CEO.
	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 and made available upon request.	Yes	There are no trade unions within the Saremas Group.
	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 incl. migrant and contract workers.	Yes	There are no trade unions within the Saremas Group.

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Clause	Indicators	Comply Yes/No	Findings
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	The Saremas Group Child Protection Policy updated in January 2018 stipulates that it will not employ child labour as defined by the ILO Convention, i.e. work by children under the age of 12, children under the age of 15 that prevents school attendance, and children under 18 that is hazardous to the physical or mental health of the child.
	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. There is a documented age screening verification procedure.	Yes	The Saremas Group Child Protection Policy updated in January 2018 stipulates that it will not employ child labour as defined by the ILO Convention, i.e. work by children under the age of 12, children under the age of 15 that prevents school attendance, and children under 18 that is hazardous to the physical or mental health of the child. There was no evidence that the estates and the mill at Saremas has employed anyone below the age of 18 years.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	Yes	The Saremas Group Child Protection Policy updated in January 2018 stipulates that it will not employ child labour as defined by the ILO Convention, i.e. work by children under the age of 12, children under the age of 15 that prevents school attendance, and children under 18 that is hazardous to the physical or mental health of the child. There was no evidence that the estates and the mill at Saremas has employed anyone below the age of 18 years.
	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	The policy protection of children is contained in the The Saremas Group Child Protection Policy updated in January 2018. There was no evidence that the estates and the mill at Saremas employ anyone below the age of 18 years.
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	This Group policy is available the " <i>Sexual Harassment, Violence and Abuse, and Reproductive Rights Policy</i> " signed and endorsed by CEO. The policy is aimed to provide a conducive working environment that is characterized by equality and mutual respect.
	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	This Group policy is available the " <i>Sexual Harassment, Violence and Abuse, and Reproductive Rights Policy</i> " dated signed and endorsed by CEO. At the Saremas 1 Palm Oil Mill, Saremas 1 Estate and Suai Estate, the Women and Children Committee met and discussed among others, issues related to sexual harassment and domestic violence.
	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	No	In the Saremas 1, Gender Committee have been established at the Mill and Estate levels to help disseminate awareness on issues relating to reproductive rights and need of new mothers. Awareness on reproductive rights need of new mothers are also briefed during muster and Gender Committee meetings held at each Mill and Estates. Management has

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Clause	Indicators	Comply Yes/No	Findings
	identified.		assessed the needs of new mothers, but without consultation with the new mothers. Based on interview on the sampled female employee in Saremas 1 Estate, it was found that the employee did not know that adequate space and paid breaks should be provided to enable mothers with infants 24 months or younger to breastfeed or express and store breast milk with privacy. The female employee currently has infant of 7 months' years old. <i>Hence an NCR MAR 03 2020 minor is raised.</i>
	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	A Dispute and Grievance Procedure is available and is applicable to the Saremas Group. The purpose of this procedure is to facilitate the dispute and grievance resolution between management, growers/ millers, and employees, local communities and other affected external parties. The Wilmar Group also has a Whistleblower Policy where the Whistleblower Complaint Response allows the whistleblower an option to remain anonymous. The Wilmar Group's Sexual Harassment, Violence and Abuse Reproductive Rights Policy which was updated in June 2014 specifies that all reports of sexual harassment will be dealt with in a confidential and discreet manner.
6.6 No forms of forced or trafficked labour are used.	6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited: <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty to the workers for termination of employment • Debt bondage • Withholding of wages 	Yes	Workers in Saremas 1 CU in Estate and Mill have entered into employment voluntarily, it was verified during the interview with Indonesian workers.
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	Yes	There is a special labour policy and procedures established known as "Recruitment of Workers". This document spells out the recruitment process.
6.7 The unit of	6.7.1 (C) The responsible person(s) for H&S is identified. There are records of	Yes	Both the estates and the mill conduct regular two-way communication with their employees through the quarterly ESH meeting. The dates of meeting held are recorded

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Clause	Indicators	Comply Yes/No	Findings
<p>certification ensures that the working environment under its control is safe and without undue risk to health.</p>	<p>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>accordingly.</p>
	<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 (English and/or Bahasa Malaysia) and explained in the language 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. S</p>	<p>Yes</p>	<p>The procedures for accident and emergencies has been established Emergency Response Plan (ERP) was established since 2008. There is formation of ERP Team & ERP for all the identified incidences. In addition the procedures have been summarised in a chart flow form and displayed for information of all employees in the mill. These includes emergencies relating fire, explosion, oil spillages & chemical spillages. The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were issued by Sustainability Unit and EMU and amended to tailor to the situation differences in the estates and mills. ERT members will receive training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The trainings are conducted by an accredited or qualified organisation who can demonstrate their suitability to provide training.</p>
	<p>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.</p>	<p>No</p>	<p>Based on the HIRARC carried out at the estates and mill the PPE types for the various activities has been identified and implemented. During a field visit workers carrying out harvesting in Saremas Estate and Suai Estate was not using the appropriate personal protective equipment (PPE). <i>Hence an NCR MNAJ 01 2020 major is raised.</i></p>
	<p>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.</p>	<p>No</p>	<p>Saremas 1 CU provides medical care to Group Estate workers with Estate Clinic established within the premises. Cases requiring higher attention of medical care are referred to Miri Hospital. All the workers both local and foreign are covered by SOCSO. The contractor workers did not provide with medical care and covered by accident insurance. Based on document review in Saremas 1 Estate, it was found that workers from contractor Bunga Pengantin Enterprise and Ismail bin Harun did not provide with medical care and covered by accident insurance. <i>Hence an NCR MAR 04 2020 minor is raised.</i></p>

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Clause	Indicators	Comply Yes/No	Findings
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	Yes	Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKKP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKKP 8 a mandatory requirement for submission to DOSH by Jan of the subsequent year. Cases if any are reviewed during safety meetings.

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	Saremas 1 CU continued to implement Integrated Pest Management (IPM) in both estates and continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the EMU which include monitoring pest population, cultural biological, physical, mechanical control and pesticides usage.
	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	Species referenced in the Global Invasive Species Database and CABI.org. are not used in managed areas of both estates.
	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.	Yes	Saremas 1 CU continued to use the Wilmar International Limited's policy dated 15 th , November, 2019 of no open burning. As advocated, the estates practised Zero burning thus no use of fire for pest control. In the 2017, 2018 and 2019 replants visited during the audit in both states, it was evident that all palms were felled, shredded, windrowed and left to decompose.
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	Saremas 1 CU continued to use agrochemicals based on the Wilmar International Limited 2011 Agricultural Manual and Standard Operating Procedure for Oil Palm (Chapter 6: Upkeep and Maintenance of Oil Palm and Chapter 8: Plant Protection- Pest and Disease Management) for various fields operations.
	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	Saremas 1 CU had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients applied per ha.
	7.2.3 (C) Any use of pesticides is		As part of the IPM plans, the quantity of pesticides required for various field conditions are

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Clause	Indicators	Comply Yes/No	Findings
	minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	Yes	documented and justified in Wilmar International Limited`s Agriculture Manual and Standard Operating Procedure for Oil Palm (Chapter 8: Plant Protection - Pest and Disease Management). The implementation in the field were consistent with the following practices and were adopted by both estates.
	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 evidence of prophylactic use of pesticides in Saremas 1 CU except in immature and young fields, where prophylactic spraying using diluted cypermethrin are still practised for the Pest and Diseases management such as control of Rhinoceros Beetle as per SOP.
	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:		
	7.2.5a Judgment of the threat and verify why this is a major threat.	Yes	Saremas 1 CU only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations 2000. 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 as mentioned above in 7.2.5 of this check list and based on audit findings. Hence, the need for a judgment of the threat assessment does not apply on the Saremas 1 CU.
	7.2.5b Why there is no other alternative which can be used.	Yes	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	Yes	
	7.2.5d What is the process to limit the negative impacts of the application.	Yes	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	Yes	
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see	Yes	

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Clause	Indicators	Comply Yes/No	Findings
	Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.		
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	Yes	The storage of pesticides at Saremas 1 and Suai Estate was concluded in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	Yes	The Standard Operating Procedure "Labelling, Handling, Storage, Transfer and Disposal of Scheduled Waste" has been established under Environment Management System Procedure.
	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 is not a practice in Saremas 1 CU. There was no evidence to show that such a method being used in both Saremas 1 and Suai Estates. This was also supported through interviews with executives, field staffs and workers. No such activities being witnessed during the site/field visit.
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	Yes	The CHRA for the mill and estates was within a 5-year validity. The details of the CHRA for all the units in Saremas 1 CU as shown below. The recommendation from the CHRA is mainly on the training for operators working in laboratory, ETP, workshop, scheduled waste, chemical operator and chemical store. The CHRA report among others described requirement of medical surveillance to be made for the listed category of employees.
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	Yes	Pregnant and breast-feeding women are not allowed to work with pesticides and hazardous chemicals in Saremas 1 CU. This instruction was tabulated in SSOP Chapter 2: 2.4.2. "Penyemburan racun". This was also supported through interviews with executives, field staffs and workers. No such activities being witnessed during the site/field visit.
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	The Waste management and disposal plan 2020 to avoid or reduce pollution had been documented and implemented with review made annually. Procedures and guideline were used to guide the waste disposal activities and to reduce pollution on the routine operation.
	7.3.2 Proper disposal of waste material, according to procedures that are fully	Yes	The procedure SWP01/02/1077–Labelling handling storage transfer and disposal of scheduled waste has been established to include E-Swiss and Scheduled Waste monitoring

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Clause	Indicators	Comply Yes/No	Findings
	understood by workers and managers, is demonstrated.		form. Collection is made by a DOE licensed contractor. It has been noted that the procedure was fully understood by the workers and managers.
	7.3.3 The unit of certification does not use open fire for waste disposal.	Yes	All palms in both estates were planted between the years 1996 to 2019. During the field visit there was no land preparation/replanting made using fire for the land preparation and clearing.
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	Saremas 1 CU continued to maintain and improve soil fertility to a level that ensures optimal and sustained yield by monitoring the fertilizer inputs through annual fertilizer recommendations as per the SOPs. Saremas 1 CU also practised the maintenance of long-term soil fertility by annual application of fertilizers based on periodic foliar and soil analysis, biomass retention (pruned fronds left to decompose in the fields) and EFB, water management and maintaining soft weeds, <i>Nephrolepis biserrata</i> within interlines.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	Yes	Saremas 1 CU continued to monitor their fertilizer inputs as recommended by Eco Management Unit (EMU) through the periodic tissue and soil sampling carried out during visits to the estates.
	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	Saremas 1 CU had a nutrient recycling strategy in place. Palm fronds were stacked in the interrow to decompose. For EFB application on both estates, priority was given for application in young mature areas and replants. The EFB assists to supplement the inorganic fertilizer thus improving the nutrient status.
	7.4.4 Records of fertiliser inputs are maintained.	Yes	Saremas 1 CU continued to maintain the records of the fertiliser inputs in the Monthly Fertiliser Returns 2020.
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	During the field visit and the soil map provided it was observed that no fragile or marginal soils found in Saremas 1 CU.
	7.5.2 No replanting of any individual, contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	Yes	Saremas 1 CU had a management strategy for planting on slopes to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by Wilmar International Limited 2011 Agriculture Manual & Standard Operating Procedure for Oil Palm.
	7.5.3 There is no new planting of oil palm on steep terrain.	Yes	Saremas 1 CU had a management strategy for planting on slopes to minimize and control erosion and degradation of soils. It was observed that there is no new planting of oil palm on steep terrain.
7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and	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	Saremas 1 CU had a management strategy for palm oil cultivation, possessing details in 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 Saremas 1 CU.
	7.6.2 Extensive planting on marginal and	Yes	There were no marginal and fragile soils in both estates.

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Clause	Indicators	Comply Yes/No	Findings
the results are incorporated into plans and operations.	fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.		
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	Yes	Saremas 1 CU had a management strategy for palm oil cultivation taking into account the soil surveys and topographic information, in planning of drainage and irrigation systems, roads and other infrastructure. The topographic information was provided and reviewed by the auditors.
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	Auditors has verified that there is no new planting on peat soil in the Saremas 1 CU after 15 November 2018 in existing and new development areas. Hence this indicator is not applicable.
	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	Auditors has verified that there is no new planting on peat soil in the Saremas 1 CU after 15 November 2018 in existing and new development areas. Hence this indicator is not applicable.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	Yes	Auditors has verified that there is no new planting on peat soil in the Saremas 1 CU after 15 November 2018 in existing and new development areas. Hence this indicator is not applicable.
	7.7.4 (C) A documented water and ground cover management programme is in place.	Yes	Auditors has verified that there is no new planting on peat soil in the Saremas 1 CU after 15 November 2018 in existing and new development areas. Hence this indicator is not applicable.
	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future	Yes	Auditors has verified that there is no new planting on peat soil in the Saremas 1 CU after 15 November 2018 in existing and new development areas. Hence this indicator is not applicable.

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Clause	Indicators	Comply Yes/No	Findings
	<p>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. 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 align="center">Yes</p>	<p>Auditors has verified that there is no new planting on peat soil in the Saremas 1 CU after 15 November 2018 in existing and new development areas. Hence this indicator is not applicable.</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 align="center">Yes</p>	<p>Auditors has verified that there is no new planting on peat soil in the Saremas 1 CU after 15 November 2018 in existing and new development areas. Hence this indicator is not applicable.</p>
<p>7.8 Practices maintain</p>	<p>7.8.1 A water management plan is in place and implemented to promote more</p>		

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Clause	Indicators	Comply Yes/No	Findings
the quality and availability of surface and groundwater.	efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:		
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	Yes	The Water Management Plans have been established and renewable annually for all the estates and mill in the CU. The surrounding communities had their respective supply of water source with non-reliance to the estates/mill management. There is no issue in the restriction and confirm via the stake holders' interviews.
	7.8.1b Workers have adequate access to clean water.	Yes	All water supply in the entire CU are made by self-water treatment plant and made supply to all levels of employees of the same source. Supplies are made to all housing areas and office complexes.
	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	The mill sampled and analyzed the water samples taken from 2 points. This is to detect for any sign of contamination/pollution resulting from the mill/estate activities. Results of the BOD mg/l are within permissible limit. There were no issues on the water quality for the sampling points.
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially BOD, is regularly monitored.	Yes	Effluent is treated to meet the standard set by DOE. The results as sighted at random as shown below. All figures in mg/L except for pH. There were no major issues encountered by the Mill in meeting the standards with occasionally marginal differences.
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	Yes	The mill processing water is obtained from the water catchment adjacent to the mill complex. The water usage monitoring is made 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	Saremas 1 CU had established a plan for improving efficiency of the use of fossil fuels and to optimise renewable energy. The plan contained in documented " <i>Fossil Fuel Management Plan 2020</i> ". The utilization of fossil fuel in 2020 is being monitored with records shown below. Commentaries are provided for the variation of consumption against the baselines.
7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed,	7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.	Yes	Saremas 1 CU Mill and Estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation. <ul style="list-style-type: none"> a) The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adverse impact the environment. b) The fuel consumption, peat oxidation, POME is provided in the Palm GHG Summary Report.

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Clause	Indicators	Comply Yes/No	Findings																																																																																			
implemented and monitored and new developments are designed to minimise GHG emissions.	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	<p>Saremas 1 CU has calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1. Verification of the data is made via online on the RSPO website by the Lead Auditor. Below is the summary of result:</p> <p>Summary of net GHG emissions from Palm GHG calculator PalmGHG calculation option used: Option 1. Summary of Net GHG Emissions.</p> <table border="1"> <thead> <tr> <th>Emissions per Product</th> <th>tCO2e/tproduct</th> <th>Extraction</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>CPO</td> <td>0.89</td> <td>OER</td> <td>21.89</td> </tr> <tr> <td>PK</td> <td>0.89</td> <td>KER</td> <td>3.13</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th colspan="2">Own Crop</th> </tr> <tr> <th>tCO2e</th> <th>tCO2e/FFB</th> </tr> </thead> <tbody> <tr> <td>Emissions</td> <td></td> <td></td> </tr> <tr> <td>Land Conversion</td> <td>91786.90</td> <td>0.53</td> </tr> <tr> <td>*CO2 Emissions from Fertilizer</td> <td>10353.87</td> <td>0.06</td> </tr> <tr> <td>**N2O Emissions from peat</td> <td>179.88</td> <td>0.00</td> </tr> <tr> <td>**N2O Emissions from fertilizer</td> <td>5950.76</td> <td>0.03</td> </tr> <tr> <td>Fuel Consumption</td> <td>2792.13</td> <td>0.02</td> </tr> <tr> <td>Peat Oxidation</td> <td>1312.04</td> <td>0.01</td> </tr> <tr> <td>Sinks</td> <td></td> <td></td> </tr> <tr> <td>Crop Sequestration</td> <td>-86624.22</td> <td>-0.50</td> </tr> <tr> <td>Conservation Sequestration</td> <td>-1395.67</td> <td>-0.01</td> </tr> <tr> <td>Total</td> <td>24355.69</td> <td>0.14</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="3">Summary of Mill Emissions and Credits</th> </tr> <tr> <th></th> <th>tCO2e</th> <th>tCo2e/tFFB</th> </tr> </thead> <tbody> <tr> <td>Emissions</td> <td></td> <td></td> </tr> <tr> <td>POME</td> <td>16276.76</td> <td>0.08</td> </tr> <tr> <td>Fuel Consumption</td> <td>310.27</td> <td>0.00</td> </tr> <tr> <td>Grid Electricity Utilization</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Credits</td> <td></td> <td></td> </tr> <tr> <td>Export of Grid Electricity</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Sales of PKS</td> <td>-436.99</td> <td>0.00</td> </tr> <tr> <td>Sales of EFB</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Total</td> <td>16150.04</td> <td>0.08</td> </tr> </tbody> </table>	Emissions per Product	tCO2e/tproduct	Extraction	%	CPO	0.89	OER	21.89	PK	0.89	KER	3.13		Own Crop		tCO2e	tCO2e/FFB	Emissions			Land Conversion	91786.90	0.53	*CO2 Emissions from Fertilizer	10353.87	0.06	**N2O Emissions from peat	179.88	0.00	**N2O Emissions from fertilizer	5950.76	0.03	Fuel Consumption	2792.13	0.02	Peat Oxidation	1312.04	0.01	Sinks			Crop Sequestration	-86624.22	-0.50	Conservation Sequestration	-1395.67	-0.01	Total	24355.69	0.14	Summary of Mill Emissions and Credits				tCO2e	tCo2e/tFFB	Emissions			POME	16276.76	0.08	Fuel Consumption	310.27	0.00	Grid Electricity Utilization	0.00	0.00	Credits			Export of Grid Electricity	0.00	0.00	Sales of PKS	-436.99	0.00	Sales of EFB	0.00	0.00	Total	16150.04	0.08
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Clause	Indicators	Comply Yes/No	Findings			
			Palm Oil Mill Effluent (POME) Treatment		POME Diverted to Anaerobic Digestion:	
			Divert to compost	0%	Divert to anaerobic pond	100%
			Divert to anaerobic digestion	100%	Divert to methane capture (flaring)	0%
			-	-	Divert to methane capture (electricity generation)	0%
	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	Yes	An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records which covers estates and mill activities / operation. 'Pollution Identification Environmental Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly.			
7.11 Fire is not used for preparing land and is prevented in the managed area.	7.11.1 (C) Land for new planting or replanting is not prepared by burning.	Yes	There was no evidence that fire had been used to prepare land for replanting in all estates.			
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	Yes	Saremas 1 CU had established fire prevention and control measures for the areas under its direct management.			
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	Yes	Saremas 1 CU had also established the fire prevention and control measures with adjacent stakeholders through stakeholder meeting.			
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.	NA	This is not applicable since there is no New Planting available.			
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:		The CU has conducted an HCV assessment in July 2008. The report entitled as "HCVF Scoping Assessment of Saremas 1 CU" was prepared by appointed third party. The assessment had covered all the HCV on RTEs species within the residual forested areas of the estates. The report also included the management and action plan. The total HCV area for Saremas 1 is 324.95 Ha.			
	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,					

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Clause	Indicators	Comply Yes/No	Findings
	the current HCV assessment of those plantations remains valid.		
	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	This is not applicable since there is no new land clearing.
	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 (where these are identified).	No	The integrated management plan was not developed in consultation with relevant stakeholders and has not considered any relevant wider landscape level considerations (where those were identified). HCV management Plan has been developed this into a management Plan in Jan 2019. However, it was found that the integrated management plan is not developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where those are identified) and also the management Plan has not considered the result of monitoring. <i>Hence an NCR MZK 02 2020 major is raised.</i>
	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	Yes	This is not applicable since there is no new land clearing

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Clause	Indicators	Comply Yes/No	Findings
	management of these conservation areas.		
	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	There was no RTE species identified at Suai and Saremas 1 Estate.
	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.	No	Records on monthly monitoring was verified during the audit. However, it was found that the Outcomes of monitoring of HCV at Saremas 1 and Suai Estate are not fed back into the management plan. <i>Thus, Minor NCR MZK 03 2020 has been raised.</i>
	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 applies.	Yes	This is not applicable since there is no new land clearing.

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Clause	Indicators		Comply Yes/No	Findings
<p>4.5.3 Time-bound plan</p> <p>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;</p>	(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	Details are available as per the following attachments relating to Time Bound Plan of Wilmar International Plantation as at 16/3/2020. a) TBP WIP - RSPO Certification Status for Malaysia Operations b) TBP WIP - RSPO Certification Status for Indonesia Operations c) TBP WIP - RSPO Certification Status for Ghana /Nigeria Operations
	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	Yes	Details of the Time Bound Plan described as per attachment 6. There were no changes in the plan and changes in the CB.
	(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	The details of the Time Bound Plan described as per attachment 6. Wilmar is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details were provided in the Time Bound Plan described as per attachment/revision in the TBP.
4.5.4 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. Any new plantings since 1 st January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an	Yes	Wilmar International Limited (WIL) complied to all the requirement. There was no new planting within the properties in WIL The internal audit assessment report has been carried out for clause 4.2.4 (e)-(h) of certification system for units such as:

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		<p>RSPO accredited CB;</p>	<p><u>Indonesia Units</u></p> <ul style="list-style-type: none"> - Pt. Agrindo Indah Perkasa on June 2018 - Ksu Mutiara Bosa Sikilang on June 2018 - Kud Damai Sejahtera on June 2018 - Kud Kapar on June 2018 - Koperasi Karya Makmur Pahirangan on February 2019 - Koperasi Mamur Sejahtera on January 2019 - Kud Permata Sawit Maligi on June 2018 - Kud Rantau Pasaman Sasak on June 2018 - Pt. Buluh Cawang Plantation on June 2018 - Pt. Daya Landak Plantation on June 2018 - Pt. Indoresin Putra Mandiri on June 2018 - Pt. Putra Indotropical on June 2018 - Pt. Pratama Prosentindo on June 2018 - Pt. Agronusa Investama – PAHAUMAN on June 2018 - Pt. Sarana Titian Permata Pom 2 on January 2019 - Koperasi Tuah Jubata on February 2019 <p><u>Arica Units</u></p> <ul style="list-style-type: none"> - Biase Plantation Limited (BPL) on February 2019 - Eyop Industries Limited (EIL) on february 2019 <p><u>Malaysia Units</u></p> <ul style="list-style-type: none"> - Jebawang Sdn Bhd – Laba Utama on April 2019 - Suburmas Plantation Sdn Bhd on April 2019 <p>Evidences & document reference such as HCV report results, land title, Racp status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc were concluded adequate in the report for all uncertified management units.</p>
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	(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>There is no report or issues raised in relation to land conflicts except for 2 claims in Saremas 1 CU. The First Dispute (Iban Claim) and The Second Dispute of Penan Claim commencing 2017 as elaborated in 4.4.6 above.</p> <p>The copies of legal ownership of the land for both Saremas 1 & Suai Estates were verified. The land was bought from Sarawak Government on 1983 and 1985, respectively. It has been confirmed during the sale of the land that there was no history of customary land tenure or recognized NCR land. These were confirmed with the Miri Lands and Survey. Hence there is no issues in relation to and conflicts or as per any claim.</p>
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3;	Yes	<p>There is no report or issues raised in relation to labour disputes. Evidences & document reference such as HCV report results, land title, Racp status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc. were concluded adequate in the report for all uncertified management units.</p>
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	Yes	<p>Wilmar International Limited (WIL) complied to all the related legal requirement. Evidences & document reference such as HCV report results, land title, Racp status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc. were concluded adequate in the report for all uncertified management units.</p>

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	(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 4.5.4 (a) – (d) above by the audit team based on self-declarations only by the company, with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:	Yes	<p>Wilmar International Limited (WIL) complied with all the requirement. There was no new planting within the properties in WIL The internal audit assessment report has been carried out for clause 4.2.4 (e)-(h) of certification system for units of the following i.e.</p> <p>a) Indonesia Units b) Arica Units c) Malaysia Units</p> <p>Evidences & document reference such as HCV report results, land title, Racp status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc. were concluded adequate in the report for all uncertified management units. There was no non-compliance found for all requirements during this audit.</p>
		<ul style="list-style-type: none"> A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement; 		
		<ul style="list-style-type: none"> Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. 		
		<ul style="list-style-type: none"> Desktop study e.g. web check on relevant complaints 		
		<ul style="list-style-type: none"> If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements. 		
4.6.4 The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.		No additional indicators	Yes	The copies of legal ownership of the land for both Saremas 1 & Suai Estates were verified. The land was bought from Sarawak Government on 1983 and 1985, respectively. It has been confirmed during the sale of the land that there was no history of customary land tenure or recognized NCR land. These were confirmed with the Miri Lands and Survey.
<p>Note:</p> <p>1. For requirements 4.5.4 (a)-(d) above, the definition of major and minor NC is stated in the RSPO P&C. For example, if an NC against a major indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless that is actively addressed;</p> <p>2. Failure to address any outstanding NC within uncertified unit(s) regarding 4.5.4 (a)-(d) may lead to certificate suspension(s) to the certified unit(s), in accordance with the provisions of these Certification Systems.</p>				

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Attachment 4

Details of Non-conformities and Corrective Actions Taken

	P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
1	6.7.3 c	HNAJ 01 2020 Major	Not all appropriate personal protective equipment (PPE) was used by harvester at the place of work. Saremas 1 and Suai Estate – Harvesters were not wearing appropriate shoes.	The HIRARC for harvesters has been assessed again and produce the proper indicator where management has agreed to provide the PPE (shoes) to the harvesters. The amended HIRARC, photos and records of shoe for harvesters' issuance dated 25/3/20, and amended SOP on harvesting requiring shoes for the harvesters were received as evidence and verified.	The continuity and effectiveness of the PPE implementation will be further checked in the next audit Status: closed
2	5.5.2	MZK 01 2020 Major	There are no explicit procedures for the outsourced process. There is a supply chain procedure in file, Saremas 1 POM RSPO – SCC dated 1/2/2020. However, there is no explicit procedures for the outsourced process.	Outsourced procedure for Saremas 1 POM is revised for inclusion into the supply chain procedure referencing the agreement contract with the outsourced contractors on the related explicit procedures. Revision has been made in S1POM-RSPO-SCC of 8 pages 2 nd revision. The revised procedure was produced as evidence and verified.	The continuity and effectiveness of the SOP implementation will be further checked in the next audit Status: closed
3	7.12.4	MZK 02 2020 Major	The integrated management plan was not developed in consultation with relevant stakeholders and has not considered any relevant wider landscape level considerations (where those were identified). HCV management Plan has been developed this into a management Plan dated 9 January 2019. However, it was found that the integrated management plan is not developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where those are identified) and also the management Plan has not considered the result of monitoring.	The management has called the meeting with the communities and briefed the HCV action and management plan. Documents received as evidence include the following minutes of meeting dated 02/4/2020 and 03/4/2020 Suai Estate attended by 12 and 14 respectively members of the stakeholders. The monitoring and management action plan 2019-2023 was briefed to all present. Document was provided and verified.	The continuity and effectiveness of the implementation will be further checked in the next audit Status: closed
1	3.3.2	HAHB 02 2020 Minor	The store SOP Ref SPOM1-SSOP-025 was not effectively implemented. Saremas 1 Mill – The general store office housekeeping / waste management was not maintained effectively.	The SPOM 1 management has upgraded the housekeeping standard at the general store office. Photos as evidence were submitted and verified by the auditor.	The continuity and effectiveness of the SOP implementation will be further checked in the next audit. Status: Open

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2	1.1.5	MAR 01 2020 Minor	Current list of contact and details of certain stakeholders and their nominated representatives was not available. Suai Estate and Saremas 1 Estate did not have NGO i.e. SADIA in their list of stakeholders.	The document controller has updated their respective stakeholder list to include the NGOs. The stakeholder lists were forwarded as evidence to the auditor for the mill, and both the estates to include among others SADIA in the NGO category.	Evidence has been provided. Corrective Action Plan accepted. However, the implementation of corrective action plan will be verified during next audit Status: Open						
3	2.2.3	MAR 02 2020 Minor	<p>Contracts in Suai Estate and Saremas 1 Estate did not contain clauses disallowing child, forced and trafficked labour. Based on sampled contracts agreements in the following estates there was found that none of them did not contain clauses disallowing child, forced and trafficked labour:</p> <p>a) Suai Estate for the contractor Chin Mui Jin (FFB and EFB Transport) and Sejati Enterprise (Replanting).</p> <p>b) Saremas 1 Estate for the contractor Bunga Pengantin Enterprise (FFB/EFB Transport) & Ismail Harun (FFB Transport).</p>	<p>The management has produced the business code of ethic which contain all the required clause and asking the contractor to sign in the business codes of ethics among others as follows;</p> <table border="1" style="width: 100%;"> <tr> <td style="width: 15%;">Clause no 3</td> <td>Clause no 3 'the entity shall not employ children or anyone below the minimum legal age of 16 years.</td> </tr> <tr> <td>Clause no 4</td> <td>Clause no 4 there is no forced, bonded or involuntary labour</td> </tr> <tr> <td>Clause no 11</td> <td>Clause no 11 "the entity upholds the principle of justice and non-discrimination against any individual in terms of race, origin, age, disability, gender, marital status, political affiliation, or any unethical practices.</td> </tr> </table> <p>Evidence has been provided in specific for the following Contractors; M/s</p> <p>a) Suai Estate -<i>Chin Mui Jin (FFB/EFB Transport) & Sejati Enterprise (Replanting).</i></p> <p>b) Saremas 1 Estate - <i>Bunga Pengantin Enterprise (FFB/EFB Transport) & Ismail Harun (FFB Transport).</i></p>	Clause no 3	Clause no 3 'the entity shall not employ children or anyone below the minimum legal age of 16 years.	Clause no 4	Clause no 4 there is no forced, bonded or involuntary labour	Clause no 11	Clause no 11 "the entity upholds the principle of justice and non-discrimination against any individual in terms of race, origin, age, disability, gender, marital status, political affiliation, or any unethical practices.	Evidence has been provided. Corrective Action Plan accepted. However, the implementation of corrective action plan will be verified during next audit Status: Open
Clause no 3	Clause no 3 'the entity shall not employ children or anyone below the minimum legal age of 16 years.										
Clause no 4	Clause no 4 there is no forced, bonded or involuntary labour										
Clause no 11	Clause no 11 "the entity upholds the principle of justice and non-discrimination against any individual in terms of race, origin, age, disability, gender, marital status, political affiliation, or any unethical practices.										
4	6.5.3	MAR 03 2020 Minor	Management has assessed the needs of new mothers, but without consultation with the new mothers. Based on interviewed on the sampled female employee in Saremas 1 Estate, it was found that the employee did not know that adequate space and paid breaks should be provided to enable mothers with infants 24 months or younger to breastfeed or express and store breast milk with privacy. The female employee currently has infants of 7 months' years old.	Training has been provided to inform the employee on the facilities and rights of new mothers with infants. Evidence has been provided training on SOP <i>Penyusunan Susu Ibu Kepada Bayi Di Bawah Umur 24 Bulan.</i> regarding breastfeed and conduct the consultation with all new mother dated 02/4/20 and 03/4/20 attended by 18 and 22 participants of Saremas 1 and Suai 1,2 respectively.	The implementation and understanding by the employees will be verified during the next audit. Corrective Action Plan accepted. Status: Open						

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5	6.7.4	MAR 04 2020 Minor	The contractor workers did not provide with medical care and covered by accident insurance. Based on document review in Saremas 1 Estate, it was found that workers from contractor Bunga Pengantin Enterprise and Ismail bin Harun did not provide with medical care and covered by accident insurance.	The management has kept copies of evidence of submission of insurance cover for contractors' workers. Copy was provided to the auditor and verified.	The continuity and effectiveness of the implementation will be further checked in the next audit. Status: Open
6	7.12.7	MZK 03 2020 Minor	Outcomes of HCV monitoring are not fed back into the management plan. The monitoring of HCV has been conducted at Saremas 1 and Suai Estate, However, it was found that the Outcomes of monitoring of HCV at Saremas 1 and Suai Estate are not fed back into the management plan	The HCV unit has summarised all the outcome from monitoring report and the meeting with the PIC has been conducted dated 02 and 03 April 2020 to discuss and brief on the positive and negative outcome. Minutes of meeting and management plan were provided to the auditor and verified.	Corrective Action Plan accepted. However, the implementation of corrective action plan will be verified during next audit Status: Open

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Attachment 5

VERIFICATION OF NON-CONFORMITIES DURING SURVEILLANCE 4 ASSESMENT AT SAREMAS 1 CU 2019

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Verification by Assessor
4.7.2 DA 01 2019 (1/2)	Major	<p><i>Findings:</i> Certain operation/activities have not been risk assessed.</p> <p><i>Objective evidence:</i> Certain operation/activities at Saremas 1 Estate and Suai Estate has not been risk assessed and updated in the HIRARC:</p> <ul style="list-style-type: none"> i. Road maintenance operation ii. Rubbish collection/FFB ramp operation iii. P&D census operation iv. Office activities/Crèche activities v. Workshop activities/CLC activities vi. Building construction activities (Saremas 1 Estate) 	HIRARC being checked and confirmed to have the continuity of activities described in the list.
4.7.2 DA 01 2019 (2/2)	Major	<p><i>Findings:</i> HIRARC control measure for working in height place activities was not effectively implemented.</p> <p><i>Objective evidence:</i> During site visit at FFB loading ramp Saremas 1 POM, sighted 2 external FFB drivers was not using PPE while opening the cages at the top of FFB lorries as they are working in height places.</p>	Training records checked for the period Jan – Dec 2019 among others has included subjects related to safety i.e. working at height. There is continuity in the implementation.
5.6.3 DA 02 2019	Minor	<p><i>Findings:</i> The data reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools was incorrect.</p> <p><i>Objective evidence:</i> The data of RSPO Palm GHG version 3.0.1 Calculator on FFB processed 204459.20mt was incorrect with actual mill FFB process data 204559.370mt.</p>	Raw data for 2019 summary was checked and tally with the input of the GHG figures. There is continuity in the implementation.
2.2.2 MZK 02 2019	Minor	<p><i>Findings:</i> The physical markers were not visibly maintained along the legal boundaries.</p> <p><i>Objective evidence:</i> Physical marker alongside Saremas 1 Div 2 Block 29 with Mega Jutamas was not visible along the legal boundaries.</p>	The Estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the estates, during the field inspection confirmed that they were clearly marked and maintained. All the physical markers/boundary stones along the legal boundaries between was visibly available.

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			Estate	Boundary	Neighbouring	
			1	Saremas 1	P2013 Blk 35	RT Golan
			2	Saremas 1	P2013 Blk 34	RT Golan
			3	Saremas 1	P2012 Blk 23	RT Rantau
			4	Saremas 1	P2011 Blk 38	RT Rantau
			5	Suai	P2017 Blk 103	RT Sabang
			6	Suai	P2003 Blk 99	RT Sabang
			7	Suai	P2003 Blk 99	RT Clarien
4.5.4 – Requirement for uncertified management unit MZK 01 2019	Minor	<p><i>Findings:</i> Supporting documentation for self - declaration was inadequate.</p> <p><i>Objective evidence:</i> Evidences & document reference such as HCV report results, land title, Racp status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc. was not available for all uncertified management units.</p>	The documents were made available and assessed as evidence for self-declaration i.e. HCV report results / land title / Racp status / LUCA status / planting statement / SOP for identifying legal, customary or user rights / a procedure for identifying people entitled to compensation /SOP calculating and distributing fair compensation, etc.			
4.3.4 MN 01 2019	Major	<p><i>Findings:</i> No documented water and ground cover management program were available at Suai Estate.</p> <p><i>Objective evidence:</i> It was found that Block 040 and 041 of Suai Estate do not conduct drainability assessments prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing.</p>	SOP and records being maintained with continuity.			
4.3.5 MN 02 2019	Minor	<p><i>Findings:</i> Drainability assessments were not available at Suai Estate</p> <p><i>Objective evidence:</i> It was found that Block 040 and 041 of Suai Estate do not conduct drainability assessments prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing.</p>	SOP and records relating to the peat soil drainability are being maintained with continuity. Records are related to NCR 4.3.4 described above.			
6.1.2 MAR 01 2019	Major	<p><i>Findings:</i> The SIA action plan for the year 2019 has been done without participation of affected parties.</p> <p><i>Objective evidence:</i> Based on reviewed SIA action plan for the year 2019 for Suai Estate and Saremas 1 Estate the assessment has been done without participation of longhouses i.e Rh Baki, Rh Jalin, Rh Sabang and Rh Golan.</p>	SOP and records being maintained with continuity.			
6.1.4 MAR 02 2019	Minor	<p><i>Findings:</i> SIA action plan was not updated in those cases where the review has concluded that changes should be made to current practices.</p> <p><i>Objective evidence:</i> Based on reviewed SIA action plan for the year 2019, the plan was not concluded replanting in Suai Estate and Saremas 1 Estate.</p>	The SIA as established by the management stated among others that the replanting changes has been concluded for the oth the estates in the CU, i.e. Suai and Saremas 1 Estate.			

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<p>6.2.3 MAR 03 2019</p>	<p>Minor</p>	<p><i>Findings:</i> A list of stakeholders was not included certain parties. <i>Objective evidence:</i> List of stakeholders in Saremas 1 POM and Suai Estate not included General of Republic of Indonesia, which in Kuching, Sarawak.</p>	<p>Auditor has reconfirmed the stakeholder list which has being revised to include among others Consulate General of Republic of Indonesia in Kuching, Sarawak.</p>
<p>6.10.2 MAR 04 2019</p>	<p>Major</p>	<p><i>Findings:</i> There was no evidence of the millers explained of FFB pricing and pricing mechanisms for FFB to the stakeholders. <i>Objective evidence:</i> Based on CBDC meeting which were held on 30 November 2018, there were no discussion on explaining FFB pricing between mill and smallholders. Interview were held between auditor and 3 smallholders sampled, they were not clear on the FFB pricing.</p>	<p>SOP and records in relation to FFB pricing are being maintained with continuity.</p>

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Attachment 6

**Time Bound Plan of Wilmar International Limited
(Malaysia)**

Updated: March 2019

No.	Company	Estate	Mill	Location	Certification year	Status
1	PPB Oil Palms Berhad	Sapi 1, Sapi 2, Kiabau	Sapi Palm Oil Mill	Sandakan	2008	Certified
2	PPB Oil Palms Berhad	Reka Halus	Reka Halus Palm Oil Mill	Sandakan	2008	Certified
3	PPB Oil Palms Berhad	Sabahmas	Sabahmas Palm Oil Mill	Lahad Datu	2008	Certified
4	PPB Oil Palms Berhad	Saremas 1, Suai	Saremas 1 Palm Oil Mill	Bintulu	2010	Certified
5	PPB Oil Palms Berhad	Saremas 2, Kaminsky, Segarmas	Saremas 2 Palm Oil Mill	Bintulu	2010	Certified
6	PPB Oil Palms Berhad	Ribubonus	Ribubonus Palm Oil Mill	Sandakan	2010	Certified
7	PPB Oil Palms Berhad	Terusan 1, Terusan 2, Rumidi	Terusan Palm Oil Mill	Sandakan	2010	Certified
8	PPB Oil Palms Berhad	Hibumas 1, Hibumas 2, Jebawang, Sekar Imej, Sapi Sugut, Sri Kamusan	Sri Kamusan Palm Oil Mill	Sandakan	2011	Certified
9	PPB Oil Palms Berhad	Suburmas	Suburmas Palm Oil Mill	Bintulu	2021	Newly added into Wilmar Membership in 2018, 3 years till certification dateline
10	PPB Oil Palms Berhad	Laba Utama Sdn Bhd - Jebawang Sdn Bhd	Sri Kamusan Palm Oil Mill	Sandakan	2022	Newly acquired in 2019, 3 years till certification dateline

RSPO PUBLIC SUMMARY REPORT

**Time Bound Plan of Wilmar International Limited
(Indonesia)**

Updated: March 2019

KALIMANTAN REGION

No.	Company	Mill	Estate	Location	Certification year	Status
1	PT Mustika Sembuluh I	PT Mustika Sembuluh I mill	Mustika Sembuluh 1, Mustika Sembuluh 2, Mustika Sembuluh 3, KUD Bitu Maju Bersama	Central Kalimantan	2010	Certified; KUD was certified in 2014
2	PT Kerry Sawit Indonesia I	PT Kerry Sawit Indonesia I mill	Kerry Sawit Indonesia 1, Kerry Sawit Indonesia 2, Kerry Sawit Indonesia 3.	Central Kalimantan	2011	Certified
3	PT Bumi Sawit Kencana	PT Bumi Sawit Kencana mill	Bumi Sawit Kencana 1, Bumi Sawit Kencana 2,	Central Kalimantan	2013	Certified
4	PT Sarana Titian Permata 1	PT Sarana Titian Permata 1 mill	Sarana Titian Permata 1, Sarana Titian Permata 2, Sarana Titian Permata 3	Central Kalimantan	2023	Was certified till Jun 2018; certification to renew after HGU process
5	PT Sarana Titian Permata 2	PT Sarana Titian Permata 2 mill	Sarana Titian Permata 1, Sarana Titian Permata 2, Sarana Titian Permata 3	Central Kalimantan	2023	New mill constructed in 2017; intial certification to proceed after HGU process
6	PT Mustika Sembuluh 2	PT Mustika Sembuluh 2 mill	Mustika Sembuluh 1, Mustika Sembuluh 2, Mustika Sembuluh 3, KUD Bitu Maju Bersama	Central Kalimantan	2015	Certified
7	PT Mentaya Sawit Mas	PT Mentaya Sawit Mas mill	Mentaya Sawit Mas 1, Mentaya Sawit Mas 2,	Central Kalimantan	2015	Certified
8	PT Kerry Sawit Indonesia 2	PT Kerry Sawit Indonesia 2 mill	Kerry Sawit Indonesia 1, Kerry Sawit Indonesia 2, Kerry Sawit Indonesia 3.	Central Kalimantan	2015	Certified
9	PT Rimba Harapan Sakti	PT Rimba Harapan Sakti mill	PT. Rimba Harapan Sakti 1, PT. Rimba Harapan Sakti 2,	Central Kalimantan	2015	Certified
10	PT Karunia Kencana Permaisejati	PT Karunia Kencana Permaisejati mill	PT. Karunia Kencana Permaisejati 1, PT. Karunia Kencana Permaisejati 2, PT. Karunia Kencana Permaisejati 3	Central Kalimantan	2017	Certified
11	KUD Karya Bersama, KUD Sejahtera Bersama, KUD Tabiku Makmur, KUD Kosudra	PT Kerry Sawit Indonesia 1,2 mill		Central Kalimantan	2020	Re-Audit, intial certification to proceed after HGU process
12	KUD Makmur Sejahtera	PT Rimba Harapan		Central	2023	HGU issue

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		Sakti mill		Kalimantan		
13	KUD Karya Makmur Pahirangan	PT Mentaya Sawit Mas mill		Central Kalimantan	2023	HGU issue
14	PT Agro Nusa Investama (Sambas)	PT Agro Nusa Investama (Sambas) mill	ANI Sambas	West Kalimantan	2020	Was certified till Jul 2018; in process for new certification
15	KUD Cempaka Biru, KUD Sentama Lestari (Plasma binaan ANI 1 Sambas)	PT Agro Nusa Investama 1 (Sambas)		West Kalimantan	2020	Was certified till Jul 2018; in process for new certification
16	PT Bumipratama Khatulistiwa	PT Bumipratama Khatulistiwa mill	Bumi Pratama Khatulistiwa	West Kalimantan	2016	Certified
			Buluh Cawang Plantation	West Kalimantan	2020	HGU is in process
17	KUD Buah Jubata	PT Bumipratama Khatulistiwa mill		West Kalimantan	2023	HGU issue
18	PT Agro Nusa Investama (Landak)	PT Agro Nusa Investama (Landak) Mill	Agronusa Invenstama 2 (Landak), Pratama Procentindo	West Kalimantan	2020	HGU issue
19	PT Agro Palindo Sakti	PT Agro Palindo Sakti mill	Agro Palindo Sakti, Putra Indotropical, Daya Landak Plantation, Indoresin Putra Mandiri	West Kalimantan	2020	HGU issue

SUMATERA REGION

No.	Palm Oil Mill/Estate	Mill	Estate	Location	Certification year	Status
1	PT Perkebunan Milano	PT Perkebunan Milano Mill	Sei Daun, Batang Saponggol, Merbau	North Sumatra	2009	Certified
2	PT Tania Selatan	PT Tania Selatan Mill	Burnai Timur, Burnai Barat	South Sumatra	2010	Certified
3	PT Kencana Sawit Indonesia	PT Kencana Sawit Indonesia Mill	Kencana Sawit Indonesia,	West Sumatra.	2019	Was certified till Jun 2018; new certification to initiate in 2019
4	KUD SWAMATA	PT Kencana Sawit Indonesia Mill		West Sumatera	2023	Was certified till Jun 2018; to initiate new certification 3 years after KSI POM being certified
5	PT AMP Plantation	PT AMP Plantation Mill	AMP I, AMP II, AMP III, AMP IV, Primatama Mulia Jaya, Karya Agung Megah Utama, Perkebunan Anak Negeri Pasaman, Koperasi Tompek Tapian Kandis, Koperasi AWM, Koperasi BST, Koperasi MSJ	West Sumatra	2011	Certified; KUD was certified in 2015

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6	PT Buluh Cawang Plantations	PT Buluh Cawang Plantations Mill	Bumi Arjo, Dabuk Rejo, Sukamulya, Bambu Kuning	South Sumatra	2012	Certified
7	PT Gersindo Minang Plantations	PT Gersindo Minang Plantations Mill	Gersindo Minang Plantation, Permata Hijau Plantation-1, Permata Hijau Plantation-2	West Sumatra	2012	Certified
8	PT Daya Labuhan Indah	PT Daya Labuhan Indah Mill	Wonosari, Sei Deras, Cabang Dua	North Sumatra	2013	Certified
9	PT Agro Palindo Sakti	PT Agro Palindo Sakti Mill	Agro Palindo Sakti	South Sumatra	2014	Mill closed down, no longer in operation
10	PT Murini Sam Sam	PT Murini Sam Sam Mill	Murini Sam Sam	Riau	2015	Certified
11	PT Murini Sam Sam (466 ha)	PT Murini Sam Sam Mill		Riau	2023	Pre assessment audit, HGU issue
12	PT Musi Banyuasin Indah	PT Musi Banyuasin Indah Mill	Sei Selabu, Sei Jarum, KUD Karya Gatra, KUD Karya Makmur Sriwijaya, KUD Panca Karya Jaya, KUD Sumber Makmur, KUD Tri Tunggal Karya	South Sumatra	2020	Final Audit, HGU issue
13	PT Sinarsiak Dianpermai	PT Sinarsiak Dianpermai Mill	Sinarsiak DianPermai	Riau	2020	Pre assessment audit
14	Agrindo Indah Persada 2	Agrindo Indah Persada 2 Mill		Jambi	2023	NPP audit in 2010
15	KUD Dastra II (Plasma binaan AMP)	PT AMP Plantation Mill		West Sumatera	2023	HGU issue
16	KUD Dastra I (Plasma binaan PMJ)	PT AMP Plantation Mill		West Sumatera	2023	HGU issue
17	KUD Sasak, KUD Kapar, Mutiara Bosa Sikilang, Permata Sawit Maligi (Plasma binaan PHP)	PT Gersindo Minang Plantation Mill		West Sumatera	2023	HGU issue
18	PHP (blok 22)	PT Gersindo Minang Plantation Mill		West Sumatera	2020	HGU issue

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**Time Bound Plan of Wilmar International Limited
(Africa)**

Updated: March 2019

No.	Company	Estate	Mill	Location	Certification year	Status
1	Benso Oil Palm Plantation (BOPP)	BOPP Adum Bansa Estate and associated Scheme Smallholders	BOPP Mill 1	Western Region, Ghana	2014	Certified
2	Benso Oil Palm Plantation (BOPP)	Treboum Smallholders	-	Western Region, Ghana	2022	Pending NPP submission in 2019
3	Biase Plantations Limited	Calaro Estate	Under Construction	Cross River State, Nigeria	2020	to be certified (mill construction in progress)
4	Biase Plantations Limited	Calaro Extension Estate	None planned	Cross River State, Nigeria	2022	to be certified (NPP completed recently in 2016. Land preparation no starting)
5	Biase Plantations Limited	Ibiae Estate	Construction not started	Cross River State, Nigeria	2020	to be certified (NPP completed. Mill construction yet to start)
6	Eyop Industries	Ibad Estate	Construction not started	Cross River State, Nigeria	2021	to be certified (mill construction yet to start), pending clarification for NPP assessment
7	Eyop Industries	Kwa Falls	None planned	Cross River State, Nigeria	2020	to be certified (replanting of existing plantations in progress)
8	Eyop Industries	Oban	None planned	Cross River State, Nigeria	2021	to be certified (NPP not started), Pending clearance from government for NPP assessment