



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

File Ref. : ES11320002

RSPO PUBLIC SUMMARY REPORT

CLIENT : WILMAR INTERNATIONAL LIMITED – SAREMAS 2 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 2	Saremas 2 Palm Oil Mill	3° 26' 57.745"N	113 °45'59.689"E	18 KM 115, Bintulu-Miri Road 97008 Bintulu, Sarawak.
	Saremas 2 Estate	3° 29' 20.648"N	113 °47'7.123" E	
	Segarmas Plantation	3° 28' 10.529"N	113 °48'12.845"E	
	Kaminsky Plantation	3° 24' 29.734"N	113 °45'22.572"E	

MAP : See Attachment 1

AUDIT DATE : 16 – 20 March 2020

DURATION : 20 auditor days

TYPE OF AUDIT : Annual Surveillance Audit No. 4

Recertification Audit

STANDARD: MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

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

VALIDITY OF RSPO CERTIFICATE : 14/06/2015 – 13/06/2020

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 : **DZULFIQAR AZMI**

Name : **Foo Siew Theng**

Signature :

Signature :

Date : **29 / 06 / 2020**

Date : **30 Jun 2020**

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SUMMARY OF AUDITS

Recertification audit			
On-site audit date	: 16 – 20 March 2020	No. of auditor days:	20 Auditor days
Audit team	: Dzulfiqar Azmi (TLA), Rozaimee Ab Rahman, Rahayu Zulkifli, Selvasingam T Kandiah.		
No. of major NCR	: 8	Indicator: 2.1.1, 3.4.3, 3.6.1, 4.1.1, 6.7.3, 7.7.4, 7.8.2, 5.5.2 (SCCS)	Closing date: 2/06/2020
No. of minor NCR	: 7	Indicator: 1.1.5, 2.2.2, 2.2.3, 3.1.3, 3.3.2, 6.2.7, 6.4.1	
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees	Settlers	Villagers / Local communities
	√		√
	Contract workers	NGOs	Govt. agency
	√	√	√
	Indigenous people	Contractor	Others (Please specify)
	√	√	
Supply base sampled	: Saremas 2 Estate, Segarmas Estate, & Kaminsky Estate		
Changes since the last audit	: No changes		
Justification of audit planning	: Total allocation of auditor days for Saremas 2 CU were: <ul style="list-style-type: none"> • Mill = 5 days (5 days for safety and health, environment, mill best practices, GHG verification and for supply chain certification systems) • All estate = 5 days each for verification of safety and health, environment, good agriculture best practices, GHG verification. 		
Report approved by	: Kamini A/P Sooriamorthy	Approval date : 22/06/2020	

Annual Surveillance Audit 4			
On-site audit date	: 08 – 12 April 2019	No. of auditor days:	18 Auditor days
Audit team	: Rozaimee Ab Rahman, Rahayu Zulkifli, Amir Bahari, Selvasingam T Kandiah, Mohd Zulfakar Kamaruzaman, Mohd Basri Hamzah (TE)		
No. of major NCR	: 3	Indicator: 2.1.1, 4.1.1, 6.1.3	Closing date: 12/5/2019
No. of minor NCR	: 5	Indicator: 4.1.3, 5.1.2, 6.2.3, 6.5.3, 4.5.4 (RSPO Certification system)	
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees	Settlers	Villagers / Local communities
	√		√
	Contract workers	NGOs	Govt. agency
	√	√	√
	Indigenous people	Contractor	Others (Please specify)
	√	√	
Supply base sampled	: Saremas 2 Estate, Segarmas Estate, & Kaminsky Estate		
Changes since the last audit	: Refer to table 1 below for updates.		
Justification of audit planning	: Total allocation of auditor days for Saremas 2 CU were: <ul style="list-style-type: none"> • Mill = 3 days (3 days for safety and health, environment, mill best practices, GHG verification and for supply chain certification systems) • All estate = 5 days each for verification of safety and health, environment, good agriculture best practices, GHG verification. 		
Report approved by	: Radziah Mohd Daud	Approval date : 16/07/2019	

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SUMMARY OF INFORMATION

TABLE 1

	RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	Mar. 2020 – Feb. 2021				Mar. 2019 – Feb.2020
Certified FFB Processed (MT)	124,823.38				136,435.06
Production of Certified CPO (MT)	27,949.84				29,912.84
Production of Certified PK (MT)	5,856.11				6,386.28
Certified Areas (Ha)	14,834.92				14,834.92
Planted Areas (Ha)	11,075.18				11,075.18
Production Areas (Ha)	7,557.93				7,557.93
HCV Areas / Conservation Areas (Ha)	1,379.71				1,379.71
REMARKS	-				

TABLE 2

	CPO	PK
Last years certified volume (MT)	29,912.84	6,386.28
Last year's actual certified sold (MT)	25,787.70	5,268.04
Last year's actual sold under other schemes (MT)	0.00	0.00
Last year's sold conventional (MT)	0.00	0.00
New year certified volume (MT)	27,949.84	5,856.11

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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
Dzulfiqar Azmi	Tr. Lead Auditor / Safety & Environment, TPB, GHG	Holds a B. Sc. in Agriculture from University Teknologi Malaysia (UiTM). He had more than 5 years of working experience in the oil palm operation. He has experience in auditing since 2018. He is trained as an RSPO Lead Auditor.
Rozaimiee Ab Rahman	Auditor / Social & Supply Chain	Holds a B.Sc. (Hons) in Agriculture from University Putra Malaysia. He had more than 5 years of working experience in the oil palm operation.
Selvasingam T Kandiah	Auditor / GAP	Holds a B.Sc. (Hons) of Agriculture University of Agricultural Sciences, Hebbal, Bangalore, India. He had more than 29 years of working experience in plantation management covering cocoa, rubber and oil palm. He is a qualified RSPO P & C and MSOP Lead Auditor.
Rahayu Zulkifli	Auditor / Social & HCV	Graduated with LLB (Hons), a practising lawyer, Head of Legal Dept. for several companies before working with an environmental NGO in 2003 and joined the RSPO in 2014. A freelance (since 2016), an expert in social aspect of the RSPO and a qualified auditor for RSPO P&C.

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1.3 Audit methodology

The audit covered the Saremas 2 POM and three of its supply base. The sampling of the number of the supply base was using the formula of $0.8\sqrt{y}$. The three-supply base covered during the audit were Saremas 2, Kaminsky Estate and Segarmas Estate. The audit included on-site audit to the estates, mill and settlers' houses to verify the implementation of the requirement of the certification. Interviews with the CU management, relevant settlers, employees, contractors and other relevant stakeholders conducted during the audit.

1.4 Stakeholder Consultation

SIRIM QAS International had initiated the stakeholder consultation by announcing the invitation in the RSPO and SIRIM QAS International's websites in 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 were as tabulated below:

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (including migrant workers)	<ul style="list-style-type: none"> ▪ Generally, foreign workers employed via recruitment agents confirmed that they did not pay any recruitment fees. However, 2 workers at the Saremas 2 Palm Oil Mill showed records of instalment payments made to recruitment agent representatives. This was purportedly to pay for the cost of staying at the recruitment agent representative's house before arriving at the Mill. The Mill wasn't aware of this arrangement. An NCR was issued to further addressed the issue. ▪ When they are at work, their children stay at the creche or the Community Learning Centre. The legalisation process of the children have been done and some are still ongoing. ▪ Pregnant worker at Kaminsky confirmed she was asked to do light work and away from chemicals soon as her pregnancy was confirmed. ▪ All workers sampled receive their wages (cheques) on or before 7th of the month.
2) Settlers	<ul style="list-style-type: none"> ▪ Not applicable
3) Villagers / Local communities (including women representatives, displaced communities)	<ul style="list-style-type: none"> ▪ Penan villagers from Jambatan Suai, Suai, Niah, Bahagian Miri no land claims/disputes and no social issues. ▪ No social issues arising from estate workers. ▪ All stakeholders were invited to attend RSPO/MSPO briefings and stakeholder meetings.
4) Suppliers	<ul style="list-style-type: none"> ▪ Suppliers confirmed that payments are received within one month of invoice. They are also aware of the complaint channel. There are no issues with the estates and mill. They receive invitations to attend stakeholder meetings but sometimes cannot attend.

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5) Contract workers	<ul style="list-style-type: none"> ▪ Contract worker confirmed that he gets paid more than the minimum wages and stays at house in Segarmas Estate.
6) Local & national NGOs	<ul style="list-style-type: none"> ▪ No issues
7) Government agencies / Statutory bodies	<ul style="list-style-type: none"> ▪ No issues
8) Independent growers / Smallholders	<ul style="list-style-type: none"> ▪ Not applicable
9) Indigenous people	Interviewed the head of indigenous people. Generally, no issue has been highlighted.
10) Contractor	<ul style="list-style-type: none"> ▪ Contractors confirmed that the contracts they have with the estates and mill are fair and transparent. The clauses on contract duration, amount and calculation of payments are clearly stated in their contracts. Payments are received within one month of invoice. There are no issues with the estates and mill. They receive invitations to attend stakeholder meetings but sometimes cannot attend. ▪ Manpower contractor details out the recruitment process of an Indonesian worker from sourcing in their home countries to arrival at the estate or mill. Contractor admits that he and his representatives are in Malaysia on social visit passes. Claims to be not aware of the charges that his representatives are charging some workers. An NCR issued to further address this.
11) Previous land owner (if any)	<ul style="list-style-type: none"> ▪ The copies of legal ownership of the land for Saremas 2 estate was verified. The estate was confirmed to be operating on land of with legitimate status. The Saremas 2 Estate hosts the site of the Saremas II Mill complex. This plantation area was previously owned by Sarawak State Government.
12) Others (please specify)	<ul style="list-style-type: none"> ▪ The grocery shop at Saremas 2 informed that they allows workers to buy goods either in cash or on credit.

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. (For RA, the next RA will be conducted at least 4 months prior to expiry date of the certificate)

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Saremas 2 certification unit (CU) is under the Saremas Sdn. Bhd. (SSB), a wholly owned subsidiary of Wilmar International Limited. The CU comprises of Saremas 2 Palm Oil Mill, and three of its supply base, which are Saremas 2 Estate, Segarmas Plantation and Kaminsky Plantation. This CU certified to RSPO P&C since 14 June 2010. The Palm Oil Mill commenced its operations in 2000 with processing capacity of 45 MT of FFBS per hour.

Saremas 2 CU have ISCC certification beside of RSPO P&C and Supply Chain.

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

The FFB sourced from company owned estates that were certified. Details of the FFB contribution from each source to the Saremas 2 Palm Oil Mill are shown in the following tables:

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

CU own estates	FFB Production		Certifying CB
	Tonnes	Percentage (%)	
Saremas 2 Estate	61,573.11	52.55	SIRIM QAS
Segarmas Plantation	17,118.66	14.61	SIRIM QAS
Kaminsky Plantation	38,484.17	32.84	SIRIM QAS
TOTAL	117,175.94	100.00	

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

CU own estates	FFB Production		Certifying CB
	Tonnes	Percentage (%)	
Saremas 2 Estate	71,816.71	57.53	SIRIM QAS
Segarmas Plantation	18,173.33	14.56	SIRIM QAS
Kaminsky Plantation	34,833.33	27.91	SIRIM QAS
TOTAL	124,823.38	100.00	

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

RSPO Supply Chain Model: Identity Preserved	Total (MT)
FFB Received	117,175.94
FFB Processed	117,168.20
CPO Production (including opening stock of 1 Mar 2019)	26,039.01
PK Production (including opening stock of 1 Mar 2019)	5,440.92
CPO Delivered as RSPO Certified	25,787.70
CPO Delivered under other schemes (MT)	0.00
CPO Delivered as Non-RSPO certified	0.00
PK Delivered as RSPO certified	5,268.04
PK Delivered under other schemes (MT)	0.00
PK Delivered as Non-RSPO certified	0.00
Credits traded thru Book & Claim	0.00

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

RSPO Supply Chain Model: Identity Preserved	Total (MT)
FFB Received	124,823.38
FFB Processed	124,823.38
CPO Production	27,949.84
PK Production	5,856.11
CPO Delivered as RSPO Certified	27,949.84
CPO Delivered under other schemes (MT)	0.00
CPO Delivered as Non-RSPO certified	0.00
PK Delivered as RSPO certified	5,856.11
PK Delivered under other schemes (MT)	0.00
PK Delivered as Non-RSPO certified	0.00
Credits traded thru Book & Claim	0.00

Table 5 Planted and certified area of the Saremas 2 CU

Estate	Planted (ha)	Certified (ha)
Saremas 2	4543.57	6119.92
Segarmas Plantation	3344.60	4727.00
Kaminsky Plantation	3187.01	3988.00
Total	11075.18	14834.92

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Table 6 Planting profile

Estate	Year of planting	Planting Cycle	Mature >3 years (Ha)	Immature < 3 years(Ha)	Planted area	% of planted area mature	% of planted area immature
Saremas 2	1995	1st	409.31	-	409.31	9.00	-
	1996	1st	490.43	-	490.43	10.80	-
	2000	1st	151.25	-	151.25	3.30	-
	2002	1st	248.32	-	248.32	5.50	-
	2003	1st	180.00	-	180.00	4.00	-
	2004	1st	235.13	-	235.13	5.20	-
	2005	1st	204.28	-	204.28	4.50	-
	2006	1st	170.15	-	170.15	3.70	-
	2007	1st	80.10	-	80.10	1.80	-
	2014	2nd	673.92	-	673.92	14.80	-
	2015	2nd	377.03	-	377.03	8.30	-
	2016	2nd	606.69	-	606.69	13.30	-
2017	2nd	-	355.39	355.39	-	7.80	
2019	2nd	-	361.57	361.57	-	8.00	
Total			3,826.61	716.96	4,543.57	84.20	15.80
Segarmas Plantation	1995	1st	298.13	-	298.13	8.90	-
	2001	1st	86.90	-	86.90	2.60	-
	2002	1st	116.58	-	116.58	3.50	-
	2003	1st	16.65	-	16.65	0.50	-
	2015	2nd	198.52	-	198.52	5.90	-
	2016	2nd	495.04	-	495.04	14.80	-
	2017	2nd	-	412.76	412.76	-	12.30
	2018	2nd	-	918.07	918.07	-	27.60
	2019	2nd	-	632.92	632.92	-	18.90
2020	2nd	-	169.03	169.03	-	5.00	
Total			1211.82	2132.78	3344.60	36.20	63.80
Kaminsky Plantation	1996	1st	1421.70	-	1421.70	44.60	-
	1997	1st	1038.28	-	1038.28	32.60	-
	2002	1st	59.52	-	59.52	1.90	-
	2017	2nd	-	137.38	137.38	-	4.30
	2019	2nd	-	417.53	417.53	-	13.10
2020	2nd	-	112.60	112.60	-	3.50	
Total			2519.50	667.51	3187.01	79.10	20.90
Sub Total			7557.93	3517.25	11075.18	68.20	31.80

2.3 Organizational Information/Contact Person(s)

The details of the contact person is as shown below:

Name	:	Pang Kim Chuan
Position	:	Group 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.
Phone no.	:	+ 60 85 325 713/+60 86 333 286
Email	:	kimchuan.pang@my.wilmar-intl.com

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3.0 AUDIT FINDINGS

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

No changes.

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?

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 is no associated smallholders supplying FFB to the CU.

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

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

No changes, all remains the same.

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

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

3.5 Complaint received from stakeholder (if any)

No significant complaints from stakeholders were observed.

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4.0 DETAILS OF NON-CONFORMITY REPORT

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

Total no. of minor NCR(s)
(details refer to Attachment 4) List : 7 1.1.5, 2.2.2, 2.2.3, 3.1.3, 3.3.2, 6.2.7, 6.4.1

Total no. of major NCR(s)
(details refer to Attachment 4) List : 7 2.1.1, 3.4.3, 3.6.1, 4.1.1, 6.7.3, 7.7.4, 7.8.2

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

Total no. of major NCR(s)
(details refer to Attachment 4) List : 1 5.5.2

5.0 AUDIT CONCLUSION

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

6.0 RECOMMENDATION

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

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

Audit Team Leader :

DZULFIQAR AZMI



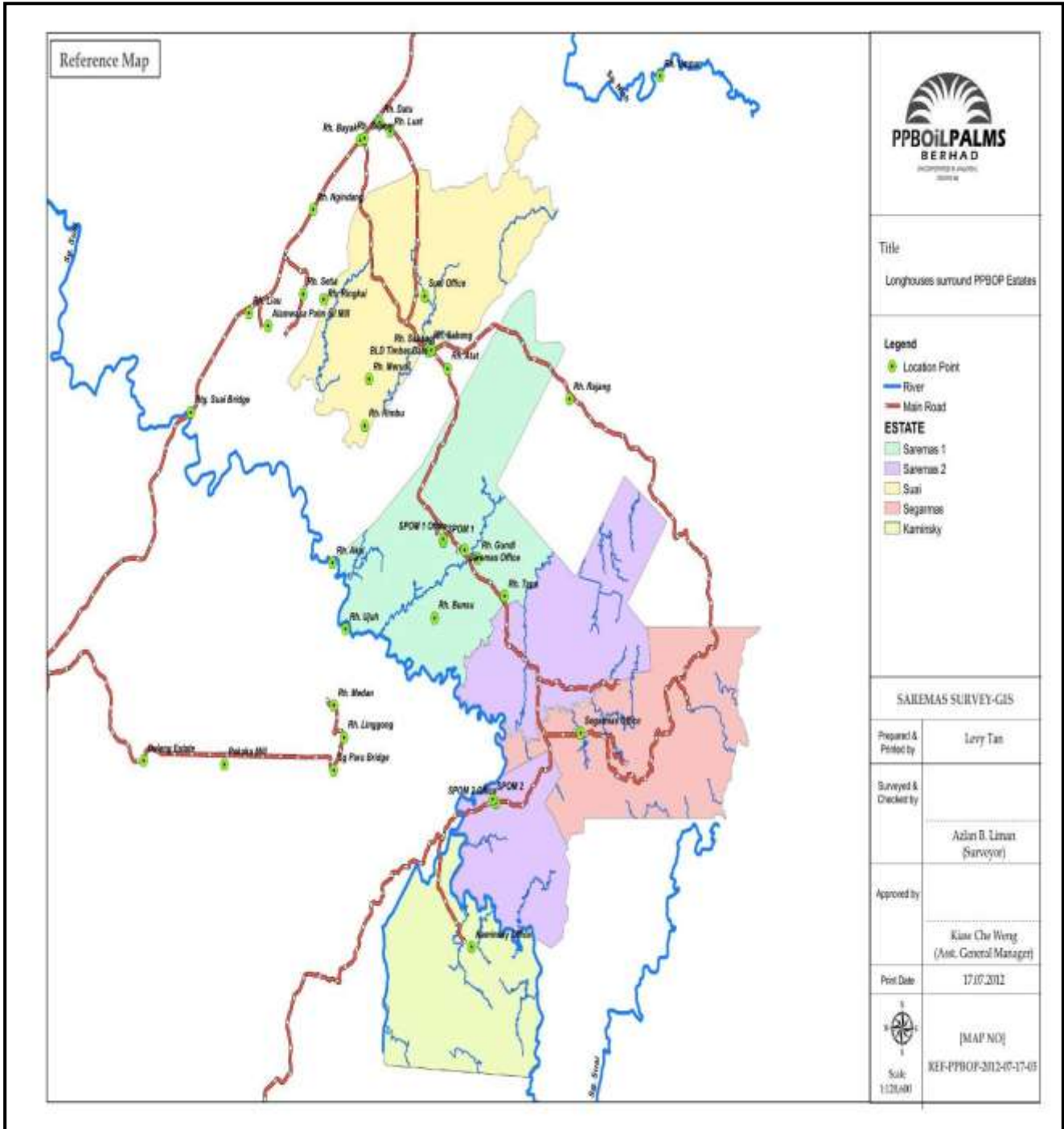
02/06/2020

(Name)

(Signature)

(Date)

Map of Saremas 2 CU



**RSPO RECERTIFICATION AUDIT PLAN
WILMAR SAREMAS 2 CU**

1. Objectives

The objectives of the audit are as follows:

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

2. Date of assessment : 16 – 20 March 2020

3. Site of assessment : Wilmar Saremas CU:
1) Saremas 2 Palm Oil Mill
2) Saremas 2 Estate
3) Segarmas Plantation
4) Kaminsky Plantation

4. Reference Standard:

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

5. Assessment Team:

Tr. Lead Auditor : Dzulfiqar Azmi (Safety, Environment, GHG)
Auditor : Rozaimée Ab Rahman (Social, HCV, Supply Chain)
Rahayu Zulkifli (Social)
Selvasingam T Kandiah (GAP, TPB)

Observer : Nil

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.

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For minor non conformities raised in the surveillance audit, corrective action shall be verified in the next audit. These shall be upgraded to major non conformities if the corrective actions are not satisfactory implemented in the next audit.

8. Confidentiality Requirements

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

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

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

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

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

RSPO PUBLIC SUMMARY

Day One: 16/03/2020 (Monday)

Time	Activities / areas to be visited				Auditee
9.00 am	Opening Meeting at Saremas 2 Estate – Audit team introduction and briefing on assessment objectives, scope, methodology, criteria and programmes by SIRIM QAS Audit Team Leader.				All
9.30 am	Briefing on the organization background and implementation of RSPO at CU (including actions taken to address previous audit findings) by company Management Representative. Logistics discussion to the sites to be visited.				Management Representative
9.40 am	To assign each audit team members – site and the P&C requirements				Guide(s) for each auditor
	Dzul Saremas 2 Estate Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Waste management including disposal site ▪ Aspects/impacts of plantation management ▪ Safety & Health practice – witness activities at site ▪ Hazard identification and Risk Management ▪ Chemical management ▪ Chemical/ fertilizer store, workshop ▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) ▪ Controlled/open burning ▪ Pollution mitigating plans ▪ Management and disposal of waste including pesticides containers ▪ Continuous improvement 	Rozaimiee Saremas 2 Estate Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Land titles user rights ▪ Support smallholder inclusion ▪ Workers Issues ▪ Line site inspection ▪ Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, provision shop & etc) ▪ Inspection of protected sites with HCV attributes ▪ Forested area ▪ Plantation Boundary, adjacent and neighbouring land use ▪ Continuous improvement Other area identified during the assessment	Rahayu Saremas 2 Estate Coverage of assessment: P1, P2, P4, P5, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Consultation with relevant government agencies ▪ Local communities and stakeholders ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as EIA, SIA, assessment and management plans. ▪ Interview with gender committee, worker representative, contractors, supplier, etc ▪ Workers Issues ▪ Complaints and grievances ▪ Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, provision shop & etc) ▪ Continuous improvement Other area identified during the assessment	Selva Saremas 2 Estate Coverage of assessment: P1, P2, P3, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Commitment to long-term economic and financial viability ▪ Good Agricultural Practice-witness activities at site (weeding/ spraying, etc) ▪ EFB mulching, POME application ▪ Nursery (if any) ▪ Plantation on hilly/swampy area ▪ IPM implementation, training and safe use of agro-chemicals. ▪ Training and skill development programs ▪ New planting ▪ Controlled/open burning ▪ Continuous improvement ▪ Riparian zone ▪ River system and Water bodies Other area identified during the assessment	

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	Other area identified during the assessment			
1.00 pm	LUNCH BREAK			All
2.00 pm	Overview of current activities at CU & Continue assessment at Saremas 2 Estate			Guide(s) for each auditor
5.00 pm	Audit team discussion / End of Day 1 audit			All

Day Two: 17/03/2020 (Tuesday)

Time	Activities / areas to be visited				Auditee
9.00 am	To assign each audit team members – site and the P&C requirements				Guide(s) for each auditor
	Dzul Segarmas Plantation Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Waste management including disposal site ▪ Aspects/impacts of plantation management ▪ Safety & Health practice – witness activities at site ▪ Hazard identification and Risk Management ▪ Chemical management ▪ Chemical/ fertilizer store, workshop ▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) ▪ Controlled/open burning ▪ Pollution mitigating plans ▪ Management and disposal of waste including pesticides containers ▪ Continuous improvement 	Rozaimiee Segarmas Plantation Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Land titles user rights ▪ Support smallholder inclusion ▪ Workers Issues ▪ Line site inspection ▪ Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, provision shop & etc) ▪ Inspection of protected sites with HCV attributes ▪ Forested area ▪ Plantation Boundary, adjacent and neighbouring land use ▪ Continuous improvement Other area identified during the assessment	Rahayu Segarmas Plantation Coverage of assessment: P1, P2, P4, P5, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Consultation with relevant government agencies ▪ Local communities and stakeholders ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as EIA, SIA, assessment and management plans. ▪ Interview with gender committee, worker representative, contractors, supplier, etc ▪ Workers Issues ▪ Complaints and grievances ▪ Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, provision shop & etc) ▪ Continuous improvement Other area identified during the assessment	Selva Segarmas Plantation Coverage of assessment: P1, P2, P3, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Commitment to long-term economic and financial viability ▪ Good Agricultural Practice-witness activities at site (weeding/ spraying, etc) ▪ EFB mulching, POME application ▪ Nursery (if any) ▪ Plantation on hilly/swampy area ▪ IPM implementation, training and safe use of agro-chemicals. ▪ Training and skill development programs ▪ New planting ▪ Controlled/open burning ▪ Continuous improvement ▪ Riparian zone ▪ River system and Water bodies Other area identified during the assessment	

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	Other area identified during the assessment			
1.00 pm	LUNCH BREAK			All
2.00 pm	Overview of current activities at CU & Continue assessment at Segarmas Plantation			Guide(s) for each auditor
5.00 pm	Audit team discussion / End of Day 2 audit			All

Day Three: 18/03/2020 (Wednesday)

Time	Activities / areas to be visited				Auditee
	To assign each audit team members – site and the P&C requirements				
9.00 am	Dzul Kaminsky Plantation	Rozaimiee Kaminsky Plantation	Rahayu Kaminsky Plantation	Selva Kaminsky Plantation	Guide(s) for each auditor
	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Waste management including disposal site ▪ Aspects/impacts of plantation management ▪ Safety & Health practice – witness activities at site ▪ Hazard identification and Risk Management ▪ Chemical management ▪ Chemical/ fertilizer store, workshop ▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) ▪ Controlled/open burning ▪ Pollution mitigating plans ▪ Management and disposal of waste including pesticides containers ▪ Continuous improvement 	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Land titles user rights ▪ Support smallholder inclusion ▪ Workers Issues ▪ Line site inspection ▪ Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, provision shop & etc) ▪ Inspection of protected sites with HCV attributes ▪ Forested area ▪ Plantation Boundary, adjacent and neighbouring land use ▪ Continuous improvement Other area identified during the assessment	Coverage of assessment: P1, P2, P4, P5, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Consultation with relevant government agencies ▪ Local communities and stakeholders ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as EIA, SIA, assessment and management plans. ▪ Interview with gender committee, worker representative, contractors, supplier, etc ▪ Workers Issues ▪ Complaints and grievances ▪ Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, provision shop & etc) ▪ Continuous improvement Other area identified during the assessment	Coverage of assessment: P1, P2, P3, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Commitment to long-term economic and financial viability ▪ Good Agricultural Practice-witness activities at site (weeding/ spraying, etc) ▪ EFB mulching, POME application ▪ Nursery (if any) ▪ Plantation on hilly/swampy area ▪ IPM implementation, training and safe use of agro-chemicals. ▪ Training and skill development programs ▪ New planting ▪ Controlled/open burning ▪ Continuous improvement ▪ Riparian zone ▪ River system and Water bodies Other area identified during the assessment	

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	Other area identified during the assessment			
1.00 pm	LUNCH BREAK			All
2.00 pm	Overview of current activities at CU & Continue assessment at Kaminsky Plantation			Guide(s) for each auditor
5.00 pm	Audit team discussion / End of Day 3 audit			All

Day Four: 19/03/2020 (Thursday)

Time	Activities / areas to be visited				Auditee
9.00 am	To assign each audit team members – site and the P&C requirements				Guide(s) for each auditor
	Dzul Saremas 2 POM	Rozaimée Saremas 2 POM	Rahayu Saremas 2 POM	Selva Saremas 2 POM	
	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Waste management including disposal site ▪ Aspects/impacts of plantation management ▪ Safety & Health practice – witness activities at site ▪ Hazard identification and Risk Management ▪ Chemical management ▪ Chemical/ fertilizer store, workshop ▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) ▪ Controlled/open burning ▪ Pollution mitigating plans ▪ Management and disposal of waste including pesticides containers ▪ Continuous improvement 	Site visit and assessment on Supply Chain Implementation including the: <ul style="list-style-type: none"> ▪ Model used ▪ General Chain of Custody ▪ System Requirements for the supply chain ▪ Documented procedures ▪ Purchasing and goods in ▪ Outsourcing activity ▪ Sales and goods out ▪ Processing ▪ Records keeping ▪ Registration ▪ Training ▪ Claims 	Coverage of assessment: P1, P2, P4, P5, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Consultation with relevant government agencies. ▪ Local communities and stakeholders ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as EIA, SIA, assessment and management plans. ▪ Interview with gender committee, worker representative, contractors, supplier, etc ▪ Workers Issues ▪ Complaints and grievances ▪ Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, provision shop & etc) ▪ Continuous improvement Other area identified during the assessment	Coverage of assessment: P1, P2, P3, P7: <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Commitment to long-term economic and financial viability ▪ Mill Practices ▪ POME application ▪ Training and skill development programs ▪ Controlled/open burning ▪ Continuous improvement ▪ Riparian zone ▪ River system and Water bodies ▪ Time Bound Plan Other area identified during the assessment	

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	Other area identified during the assessment			
1.00 pm	LUNCH BREAK			All
2.00 pm	Overview of current activities at CU & Continue assessment at Saremas 2 POM			Guide(s) for each auditor
5.00 pm	Audit team discussion / End of Day 4 audit			All

Day Five: 20/03/2020 (Friday)

Time	Activities / areas to be visited				Auditee
8.30 am	All Team will continue unfinished assessments at respective sites.				All
9.00 am	To assign each audit team members – site and the P&C requirements				Guide(s) for each auditor
	Dzul Unfinished assessments at respective sites	Rozaimie Unfinished assessments at respective sites	Rahayu Unfinished assessments at respective sites	Selva Unfinished assessments at respective sites	
	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Continue assessment ▪ Verification on outstanding issues ▪ Auditor to inform auditee on the required document / records 	Coverage of assessment: P1, P2, P3, P6, P7: <ul style="list-style-type: none"> ▪ Continue assessment ▪ Verification on outstanding issues ▪ Auditor to inform auditee on the required document / records 	Coverage of assessment: P1, P2, P4, P5, P7: <ul style="list-style-type: none"> ▪ Continue assessment ▪ Verification on outstanding issues ▪ Auditor to inform auditee on the required document / records 	Coverage of assessment: P1, P2, P3, P7: <ul style="list-style-type: none"> ▪ Continue assessment ▪ Verification on outstanding issues ▪ Auditor to inform auditee on the required document / records 	
12.30 pm	LUNCH BREAK & FRIDAY PRAYER				All
2.00 pm	Verification on outstanding issues for CU Continue Audit Team discussion and preparation of assessment findings.				Guide(s) for each auditor
3.00 pm	Discussion and acceptance on assessment findings with Management Representative and visited site Plantation / Scheme Manager				All
4.00 pm	Closing meeting at CU / End of audit				All

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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	Saremas 2 CU continued to maintain a comprehensive system with respect to this criterion. Request Forms were available for stakeholders or interested party to obtain information related to RSPO. Records of visit by the Government agencies were also established. Saremas 2 CU also continued to implement the procedure for responding to any communication as outlined in their RSPO System procedure. The procedure required the appointed person-in-charge to respond to all communication within a specified time frame.
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	The CU continued to use their website for disseminating public information. Information relating to land titles, policies, environmental, social and/or legal, complaints and grievances are available at http://www.wilmar-international.com
	1.1.3 (C) Records of requests for information and responses are maintained.	YES	The Saremas 2 CU continued to maintain the records of requests for information and responses are maintained which included the government agencies, schools, local communities. Management documents relating to environment, social and legal issues, were available to the public except for those prevented by commercial confidential or where disclosure of information would result in negative environmental or social outcomes.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	YES	The consultation and communication procedure used within Saremas 2 CU was prepared by the RSPO Unit of PPB Oil Palms Bhd. Briefing on the consultation and communication procedure was minuted and given during stakeholder meeting at Saremas 2 Estate in Dec 2019.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	NO	List of stakeholders for all units within Saremas 2 CU were sighted during the audit. For Saremas 2 estate, the stakeholder list was updated in Jan 2020. It contains list of suppliers, contractors, grocery supplier, government agencies, NGOs, local communities, clinics, neighbouring estates and smallholders. However, at Saremas 2 CU, the list of nominated representatives for suppliers and government agencies were incomplete in that the names and contact details were not included. Additionally, SADIA, the Sarawak NGO representing the local communities from Jambatan Suai in their land claim against Saremas 2 CU has not been listed as a stakeholder. Therefore, a Minor Non-Compliance No. RZ 02 of 2020 was raised.

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Clause	Indicators	Comply Yes/No	Findings
1.2 The unit of certification commits to ethical conduct in all business operations and transactions.	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	YES	Saremas 2 CU is bound by Wilmar International Limited's written Code of Ethics and Code of Conduct. Both policies commit to a code of ethical conduct and integrity in all operations and transactions and were available and sighted during the audit.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	YES	A system to monitor compliance is available.

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.	NO	It was evident that Saremas 2 CU continue to comply with most of the applicable laws and regulations relevant to the management unit. However, during the site audit, it was found that the SW Contractor at Saremas 2 Estate, did not maintain proper labelling for SW 305. Hence, Major NCR DA 01 2020 was raised.
	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	At Saremas 2 POM, Saremas 2 Estate, Segarmas Esatet, and Kaminsky Estate, there is a documented system for identifying, tracking, updating changes in legal requirements and to monitor the status of their legal compliance. Each site had developed its own legal register. There were evidences of compliance to legal requirements which have been evaluated on an annual basis. A mechanism to ensure compliance to legal and other requirement in has been documented. The Sustainability Unit will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal 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	Boundary markers/ marking pegs were available to identify the boundary and were satisfactorily maintained.
2.2 All contractors	2.2.1 A list of contracted parties is maintained.	YES	The list of contracted parties was established in the list of stakeholders – supplier & contractor.

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Clause	Indicators	Comply Yes/No	Findings
providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	NO	At Saremas 2 CU since the scope of certification was Identity Preserved, there was no FFB supplier to this CU. However, the evidence that all contracted third parties related to insurance covered for foreign and local workers was not at available at Segarmas Estate and Kaminsky Estate. Thus, #Minor NCR RAR 01 2020 has been raised. Furthermore, Saremas 2 CU could not demonstrate that legal due diligence was done before engaging P.T. Persada Duta Utama, recruitment agent engaged by Saremas 2 CU. As admitted by the representative of P.T. Persada Duta Utama, the representatives are in Malaysia on a social visit pass, and has no valid work permit to carry work as a recruitment agent. Therefore, Minor Non-Compliance No. RZ06 of 2020 was raised.
	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	During site visit at Saremas 2 Certification Units, sighted that all contract agreement between management and contractor was not include Clause disallowing child, forced and trafficked labour and where young worker are employed are protected. Thus, #Minor NCR RAR 02 2020 has been raised.
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	Fresh Fruit Bunches are supplied from Wilmar International Limited owned estates which are certified to RSPO. There is no third-party FFB sent to the mil.
	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	Fresh Fruit Bunches are supplied from Wilmar International Limited owned estates which are certified to RSPO. There is no third-party FFB sent to the mil.

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

Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.	3.1.1 (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	YES	All 3 Estates, Saremas 2 Estate, Segarmas Plantation Sdn Bhd and Kamisky Sdn Bhd continued to be committed to long-term economic and financial viability. The Estates had management plans in their current year's budgets and projections. The annual budgets and projections were prepared on an annual basis before the end of current year. The yearly budget and projections where the cost of production was reviewed annually and compared against expenditure for each year was an on-going process. The parameters monitored remained essentially unchanged and included Capital (CAPEX) and Operating costs. The operating expenditure included expenditure for Replanting, Mature and Immature Oil Palm upkeep, Administration cost, Housing and Machinery upkeep, allocation for sustainability implementation (environmental, social, occupational safety and health), infra-structure development (roads, etc.), and training etc. The budget for 2020 and projections until year 2028 were made available to the auditors.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	All 3 Estates, Saremas 2 Estate, Segarmas Estate and Kamisky Estate had established and maintained replanting programme which was reviewed annually. Long range replanting was sighted until 2030.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	NO	Several meetings were held by management. However, on Saremas 2, Segarmas Plantation Sdn Bhd and Kaminsky Plantation Sdn Bhd there were no records to show that RSPO 2019 MYNI P & C Internal Audits and management reviews were conducted. Thus, the Minor NCR STK 01 2020 was issued.
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	Continuous Improvement Plan has been implemented as per in the document Continuous Improvement Plan (CIP) dated January 2020. The improvement plan outlined issues highlighted as per in the EAI and SIA as well as other reporting means i.e. internal & external audit.
	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	NA	Not applicable.

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Clause	Indicators	Comply Yes/No	Findings
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	As for Saremas 2 CU continued to use the following documented SOPs: I. Wilmar International Limited, Agriculture Manual & SOP for Oil Palm 2011. II. PPB Oil Palms Berhad (Sarawak Operations) Safe Standard Operating Procedure for Oil Palm Plantations (SSOP) – Doc No. PPB SWK PLT/SSOP (16)/(0)/0217 III. Safety and Health Manual – April 2015 IV. Environmental Management System Procedures January 2008 V. Wilmar International Plantation Malaysian Operations Standard Operating Procedures Checklist 2013
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	NO	All 3 Estates, Saremas 2 Estate, Segarmas Plantation Sdn Bhd and Kaminsky Sdn Bhd had in place the mechanism to check consistent implementation of procedures. All 3 estates had lists of SOPs and monitored good agricultural practices as per SOPs by on-site visits, inspections and discussions with relevant personnel and by conducting Assessments and audits like Internal Audits, Agronomist visits and by RSPO Audits. However, the Saremas 2 CU could not demonstrate that it has a mechanism to check consistent implementation of procedures. It was found during the audit that: a. Instructions given during meetings were not consistently implemented. Instructions and briefings given during Women and Children Committee meeting that parents should not send sick children to the creche was not implemented. b. Recruitment of workers Policy has not been implemented when at least two migrant workers at the Saremas 2 Palm Oil Mill have been asked to pay to the agents and/or representatives. Therefore, a Minor Non-Compliance NCR No. RZ05 of 2020 was raised.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	YES	Evidence was available that Saremas 2 CU was able to demonstrate that it has maintained records of monitoring and action taken. Records of new workers' recruitment process was also sampled. There is evidence that records of employment, form containing personal details, training, benefits, permit and passports are available and duly maintained in each individual files. Probation period is only applicable to Malaysian workers sampled at Saremas 2 Estate. Foreign workers are not subjected to probation periods.
3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	YES	Saremas 2 CU has established procedure for SOP for Environmental Impact Assessment Procedure titled "Identification of Environmental Aspects and Evaluation of Environmental Impacts". Environmental aspect and impact (EAI) which covers from upstream activities such as FFB reception until downstream processes was sighted during assessment and established for 2019/2020. Identification and evaluation of environmental impact was done for all activities and processes related to the mill operation. Among the most significant environmental receptors are the boiler stack emission which associated with air emission, palm oil mill effluent (POME) discharge to land application. For all estates, latest environment aspect impact assessment was reviewed on 18/02/2019 covering new building construction in estates certification units. The main purposed of this assessment was to evaluate and analyse the operations impact on soil, water, and lair associated with the organization activities. The EAI review process had included stakeholders' consultation with regards to environmental aspects, impacts, and pollution control, and ERT, HCV and land usage issues. The reviews done had involved respective Managers, Assistants and Sustainability Team with external

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Clause	Indicators	Comply Yes/No	Findings
monitoring plan is implemented and regularly updated in ongoing operations.			stakeholders such as from Govt. agencies, neighbouring estates, local villagers, suppliers and contractors. So far, no issues related to environmental has been highlighted during stakeholders meeting.
	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	For Saremas 2 CU, the SIA and EIA reports separated. Significant environmental aspect and impact mitigation methods was implemented from EAI Evaluation Form. Those activities evaluated as significant were then monitored using the management control and mitigation measure established for each activity where the significant impacts occurred. The EAI assessments had included the identification of aspects and impacts from resulting from the POM and Estate operations.
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	NO	All estates and mill at Saremas 2 CU were able to demonstrate that the SIA management and monitoring plans are being updated annually. However, control measures for maintenance of vehicle and equipment activities was not fully implemented. During site visit at Contractor at Workshop Saremas 2 Estate, sighted oil spillage near to watercourse. Thus, Major NCR DA 02 2020 was raised.
3.5 A system for managing human resources is in place.	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.	YES	Employment procedures which include recruitment, selection and hiring are available. For matters related to termination of employment and retirement, these are contained in employment contracts. Clause 2 of the employment contract states that retirement age for workers is 60. These documents are available to workers and their representatives.
	3.5.2 Employment procedures are implemented, and records are maintained.	YES	Based on the sampling of the workers' employment contracts and personal files, there is evidence that the employment procedures on recruitment, selection, hiring, promotion are implemented. Records are also maintained in each worker's individual file. Hiring process begins with newspaper advertisement, employee referrals, review of candidate's resume, job application, shortlisting, reference checks, interview, medical check-up and issuance of offer letter. Promotion would be recommended based on evaluation of behavior, performance appraisal and current work results. No termination had occurred so this element of the procedure could not be verified during the audit.
3.6 An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	NO	The hazard identification, risk assessment and risk control (HIRARC) procedure has been established. Saremas 2 CU have conducted the risk assessment on all its operation as well as determining their control measures. The estates had conducted risk assessment on all its operation as well as determining their control measures annually. Last review was in Feb 2020 related to all activities. Risk assessment on activities such as replanting, harvesting, weeding, manuring, pruning, P&D, road maintenance, etc. have been carried out and control measures determined. However, the HIRARC form for risk control replanting activities i.e. planting palm and nursery activities was not monitored and assessed. Thus, Major NCR DA 03 2020 was raised.

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Clause	Indicators	Comply Yes/No	Findings
			Furthermore, safety mitigation plans are not implemented and monitored. During site visit at Saremas 2 Estate Contractor Workshop, it was sighted that an acetylene tanks which was not chained and fixed securely causing the risk of an explosion. Thus, Major NCR DA 03 2020 was raised.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	YES	Occupational Health and Safety Policy for Wilmar International Limited has been established for new revision and endorsed by the Executive Director & Chief Sustainability Officer. The policy had been communicated to all levels of the organization through briefings and also being displayed prominently in Bahasa Malaysia and English on notice boards at mill and estate office and Muster Ground.
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	YES	A documented program that provided training for all staff and workers which took into account gender-specific needs, and which covered applicable aspects of the RSPO P&C was available on all 3 Estates and Seramas 2 POM. Regular assessments of training needs were prepared by HR Department and transferred down to the estates and mills for implementation. Training needs are formalised using <i>training needs assessment form</i> . Training needs identification matrix has been established with target dates for the training to be conducted.
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	YES	Records of training are maintained, where appropriate on an individual basis at Saremas 2 CU:
	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	RSPO (SCCS) training is provided to all personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) at the CU in Aug 2019.

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**).

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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 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.	YES	Saremas 2 Palm Oil Mill (S2POM) sourced for their FFB only from estates under the same CU which involve, Saremas 2 Estate, Segarmas Estate, and Kaminsky Estate.
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	Not applicable.
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	YES	The estimated tonnage for CPO & PK products were provided in this report (refer Table 4) and also in the CU certificate (March 2020 – Feb 2021).

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>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.</p> <p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).</p>		

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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>YES</p>	<p>Saremas 2 POM Organizational, management systems and the operational systems, documented policies and procedures of the organization holding certification, are sufficient and adequately implemented to meet the intent and requirements of the RSPO Supply Chain Certification Standard.</p> <p>Sighted Saremas 2 palm oil mill has updated and change the name of documented procedure named RSPO Supply Chain Certification Procedure. Among the documented requirements related to Mill Supply Chain definition, delivery of FFB to mill, delivery of CPO and PK to refinery, mass balance calculation, daily production report, checking validity of the certification of the suppliers, Internal Audit, Management Review.</p> <ol style="list-style-type: none"> 1. Mill Supply Chain Definition 2. Management Representative 3. Purchasing and Goods In 4. Out Sourcing 5. Sales and Goods Out 6. Registration of Transactions 7. Training 8. Record Keeping 9. Claims 10. Complaints Procedure 11. Internal Audit 12. Management Review 13. Supply Chain Model – Identity Preserved 14. GHG Tabulation for RSPO Certified POM <p>There was no evidence that Saremas 2 POM seeking certification outsources activities to independent third parties.</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> <ul style="list-style-type: none"> • Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. • 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	RSPO internal audit was conducted based on SOP Internal audit by the appointed lead auditor. The internal audit has follow the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. There are 0 nonconformance report (NCR). Audit Attendance sheet, audit plan, audit notes, was sighted by auditor.
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.

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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	S2POM had described transportation as their outsourced activity. Contract agreement/ notification (letter for outsourced activity/ addendum agreement) were sighted & found adequate. It had been well acknowledged by the third-party service provider. The transporter had also been listed in contractor list. S2POM did not outsource for their kernel crushing process. The kernel being sold to internal and external buyer (contract-dependent).
	<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</p>	NO	<p>a) There are 3 outsource company CPO and PK transporter .</p> <p>b) There was a contract document between Saremas 2 POM and the transporters. Access to the outsourcing contractor or operation if an audit is deemed was stated in the addendum contract</p> <p>c) There is no explicit procedures for the outsourced process. Thus #Major NCR RAR 03 2019 has been raised.</p> <p>d) Inspection was carried out as additional effort to ensure no contamination sighted book at AP Post.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>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 information, when this is announced in advance.</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.	YES	List of contractors had been updated accordingly and had included the appointed transporter.
	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	Not available.
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	S2POM was noted to have well-maintained their records and reports covering all aspects of the standard requirements.
	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		It had been described in their SOP for Sustainable Supply Chain & Traceability that records and reports shall be kept for more than 2 years.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>be able to confirm the certified status of raw materials or products held in stock.</p> <p>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.</p>	YES	<p>Figures for volume purchased (input) and claimed (output) over a period of 12 months (since last audit) was sighted and details as per listed in Table 3 of this report.</p>
D.5.1	<p>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.</p>	YES	<p>RSPO Records for Oil Mills had been updated by relevant personnel and had included the receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK. Their WB.net system also being referred for real-time transaction details as well as daily/monthly summary of their material movements (FFB, CPO, PK, others).</p>
E.5.1	<p>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.</p> <p>b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</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>	YES	<p>S2POM has maintained to record receipts of RSPO certified FFB and deliveries of RSPO certified CPO & PK using three monthly basis was sighted that all the data were found up to date.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
Conversion Factors 5.10	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).	YES	Based on nature of their processing activities, TPOM's conversion factor shall be based on their oil extraction rate (OER) and kernel extraction rate (KER). These rates being monitored on daily basis as part of their process performance evaluation and consolidated at month end.
	5.10.2 Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	YES	
Processing D.6	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.	YES	S2POM shall only receive the RSPO certified FFB which are from Saremas 2 CU own estates – same CU. Monitoring records titled as “SPOM2 FFB Received” has recorded the tonnage of certified FFB and other relevant process details. Verified through WB.Net system and random sample of weighbridge tickets, being found that no external FFB intake occurred, hence no downgrade required. Consecutively, it is confirmed that RSPO certified oil palm product is from the certified sources. As for transport, dedicated tankers had been allocated by service provider to prevent cross contamination.
Sales and goods out 5.6	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; <ul style="list-style-type: none"> • The name and address of the seller; • The loading or shipment / delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply 	YES	The procedure in handling of sale and delivery was sighted and found adequate. Sales activities usually handled by PPB Oil Palms Berhad and Marketing Department (HQ) on behalf of Saremas 2 POM.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</p> <ul style="list-style-type: none"> • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number. • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). 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. 		

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
Registration of Transactions 5.7	5.7.1 Supply chain actors who: <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	S2POM through usually handled by PPB Oil Palms Berhad and Marketing Department (HQ) on behalf of Saremas 2 POM. Personnel updated the RSPO IT platform system upon confirmed contract. The registration of transaction being carried out by Group Plantation Marketing subordinate. Mill receive copy of transaction input to the system on monthly basis based on contract summary (buyer weight being put in).
	5.7.2 The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: 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.		
	The declaration time to do Shipping Announcement / Announcement is based on members' own standard operating procedures. 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. Remove: RSPO certified volumes sold under other scheme or as conventional, or		

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	in case of underproduction, loss or 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 2 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.	NO	The policy to respect human rights and prohibiting retaliation against HRD has not been communicated. There is nil to low understanding of what HRD is and the prohibition against retaliation against HRDs among all levels of workforce and local communities. There is no record that the policy has been communicated to all levels of the workforce, operations, FFB suppliers and local communities. Therefore, a Major Non-Compliance NCR No. RZ04 of 2020 was raised.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment, in their operations.	YES	As observed during the audit and during interviews held, there is no evidence of violence instigation, harassment or use of mercenaries or paramilitaries in any of the operations at Saremas 2 CU.
4.2 There is a mutually agreed and documented system for dealing with complaints and	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	YES	Evidence is available of a system open to all affected parties, ensuring anonymity of complainants. This system is known as Dispute and Resolution Procedure. This procedure applies to negotiation procedures involving external and internal stakeholders, and also explains the Group's conflict resolution process in a flowchart. Protection for HRD and community spokesperson is also provided under the Wilmar Group's Whistleblower Policy.

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Clause	Indicators	Comply Yes/No	Findings
grievances, which is implemented and accepted by all affected parties.	spokespersons and whistleblowers, where requested, without risk of reprisal or 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	Procedures are in place to ensure affected parties understand the Dispute and Resolution Procedures. Verbal explanation is given in an easy to understand language accompanied by pictorial explanations, and where relevant, flowcharts. If necessary, senior foreign workers who could speak and understand the Bahasa Malaysia act as translators to their other colleagues, especially the newly-arrived ones.
	4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	YES	There is evidence that Saremas 2 CU keeps parties to a grievance informed of progress. Verified were the complaints received from workers on housing defects and recorded in the complaints book. Also recorded in the complaints book was the Manager's approval for repair given, update of the repair progress and acknowledged by the complainant by appending his signature in the complaint book.
	4.2.4 The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	YES	The conflict resolution mechanism does have an option for aggrieved parties to have the option for representatives of their choice.
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	Saremas 2 CU is able to demonstrate that contributions to community development have been made based on consultation results with the local communities.
4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users	4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land	YES	The copies of legal ownership of the land for Saremas 2 estate was verified. The estate was confirmed to be operating on land of with legitimate status. The Saremas 2 Estate hosts the site of the Saremas II Mill complex. The documents related to the right to use the land was made available to the audit team. Records of ownership were maintained at respective estate's office. This plantation area was previously owned by Sarawak State Government.

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Clause	Indicators	Comply Yes/No	Findings
without their free, prior and informed consent.	tenure and/or the actual legal or customary use of the land are available.		
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	YES	Saremas Sdn Bhd (SSB) has entered into a Memorandum of Understanding with the indigenous Iban community residing in a longhouse within the plantation of SSB. The MoU was entered with their free, prior and informed consent in August 2008. This MOU was signed by Tuai Rumah, SSB representative i.e. the Assistant General Manager. This MoU was witnessed by the Group Manager. In this MoU, SSB has allowed the local Iban community to occupy, conduct livelihood, cultivate settlement area, maintain burial grounds and practice all native customs and rites, consume or trade all the fruits and their cultivation. Included also are their rights to hunt and gather other forest produce naturally necessary for their culture and sustenance.
	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.	YES	
	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.	YES	
	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.	YES	
4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring	NA	Not applicable.	

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Clause	Indicators	Comply Yes/No	Findings
	communities where applicable, and relevant authorities).		
	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 related documentation and records of meeting regarding the land acquisition was kept in Saremas 2 Office and was verified by the auditor.
	4.4.5 (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	YES	There is evidence that communities are represented through institutions or representatives of their own choosing, including legal counsel.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	YES	Since 2014, land claim was made by a group of Penans Community of Jambatan Suai. Two groups from the same origin claimed over part of land. The areas involved overlapping with Saremas 1 & 2, Segarmas Estate, Suai Estate and Kaminsky Estate. Further progress as 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	During site visit at Saremas 2 CU there was no new planting.
	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	During site visit at Saremas 2 CU there was no new planting.
	4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on	YES	During site visit at Saremas 2 CU there was no new planting.

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Clause	Indicators	Comply Yes/No	Findings
	<p>their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p>		
	<p>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 proc.</p>	<p>YES</p>	<p>During site visit at Saremas 2 CU there was no new planting.</p>
	<p>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.</p>	<p>YES</p>	<p>During site visit at Saremas 2 CU there was no new planting.</p>
	<p>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.</p>	<p>YES</p>	<p>During site visit at Saremas 2 CU there was no new planting.</p>
	<p>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.</p>	<p>YES</p>	<p>During site visit at Saremas 2 CU there was no new planting.</p>

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Clause	Indicators	Comply Yes/No	Findings
4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with thru a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	YES	For cases involving the loss of customary land rights, the estate will manage them using the procedure entitled "Process for Identification of Legal and Customary Rights and Identifying People Entitled for Compensation".
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	YES	The procedure for calculating and distributing fair compensation is contained in the document entitled "Process for Identification of Legal and Customary Rights and Identifying People Entitled for Compensation". In it, the process of determining compensation was addressed.
	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	No scheme small holding was available at Saremas 2 CU.
	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	As of the date of the Audit, Saremas 2 and Segarmas Plantation Sdn Bhd were in the process of a conflict resolution with the Penans of Jambatan Suai. Further progress was available in the confidential version of this report.
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	During site visit at Saremas 2 CU there was no new planting.
	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	During site visit at Saremas 2 CU there was no new planting.
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	YES	During site visit at Saremas 2 CU there was no new planting.

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Clause	Indicators	Comply Yes/No	Findings
<p>4.8 The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>	<p>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.</p>	<p>YES</p>	<p>Further progress is available in the confidential version of this report.</p>
	<p>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.</p>	<p>YES</p>	
	<p>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 (Indicators 4.4.2, 4.4.3 and 4.4.4).</p>	<p>YES</p>	
	<p>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).</p>	<p>YES</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	At Saremas 2 CU, FFBs were supplied from Wilmar International Limited owned estates which are certified to RSPO. There was no third-party FFBs sent to the mill. Thus, no contract involved with smallholder.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	YES	There was no third-party FFBs sent to the mill. Thus, no contract involved with smallholder.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	YES	There was no third-party FFBs sent to the mill. Thus, no contract involved with smallholder.
	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 was no third-party FFBs sent to the mill. Thus, no contract involved with smallholder.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	YES	There was no third-party FFBs sent to the mill. Thus, no contract involved with smallholder.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	YES	There was no third-party FFBs sent to the mill. Thus, no contract involved with smallholder.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	YES	There was no third-party FFBs sent to the mill. Thus, no contract involved with smallholder.
	5.1.8 The unit of certification supports Independent Smallholders with	YES	There was no third-party FFBs sent to the mill. Thus, no contract involved with smallholder.

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Clause	Indicators	Comply Yes/No	Findings
	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.		
	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 was no third-party FFBS sent to the mill. Thus, no contract involved with smallholder.
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	The management of Saremas Complex's (Saremas 1 & 2 CU) conducted a consultation with smallholder surrounding the estate through stakeholder meeting "community-based development committee (CBDC)" in May 2019.
	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	Saremas Certification Unit has conducted stakeholder meeting in May 2019.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	YES	Not applicable.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	YES	There was no scheme smallholder at the Saremas CU.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	YES	The smallholder support programme has been briefed during stakeholder meeting. It was conducted and reviewed by yearly basis.

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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	Saremas 2 CU subscribes to Wilmar's Equal Opportunity Policy. Saremas 2 CU was able to demonstrate the implementation of this Policy as confirmed by all workers interviewed (local, foreign, male, female, new and old hires) that all workers irrespective of race, origin, age, gender and faith receive equal treatment.
	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	Evidence is available that no employee has been discriminated against. This is evident from sampled employment contracts where all workers, (male, female, foreign, local) signed the same employment contract. Workers interviewed also confirmed that they face no form of discrimination. Workers' pay slips were also sampled which showed that workers receive the same amount of daily rate of RM42.31 per day for the same work irrespective of gender, age or nationalities.
	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	As stipulated in the "Recruitment selection, Hiring and Promotion" for staff and "Recruitment of Workers" for workers the recruitment selection, hiring and promotion where relevant are based on availability, skills, capabilities, qualities, and medical fitness necessary for the jobs.
	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	Based on documents, confirmed by the Health Assistants and workers, pregnancy tests were conducted when the workers presented themselves at the estate clinic and the tests are not conducted in a discriminatory manner. All workers who have been tested as pregnant will be required to undergo medical tests at the nearest government clinic or the VMO's private clinic. Alternative equivalent employment is also offered for pregnant women.
	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	The gender committees throughout the Saremas 2 CU are known as the Women and Children Committees. Membership comprise female employees and the employees' wives. Based on interviews of the committee members and review of meeting minutes, the Committees main activities are to provide awareness to its members on issues of concern. These relate to sexual harassment, domestic and other forms of abuse, children's health, creche hygiene, no sick children at the creche, children's immunization and education, as well as women's reproductive rights, maternity benefits and leave entitlement.
	6.1.6 There is evidence of equal pay for the same work scope.	YES	Based on the pay slips and employment contracts sighted at the Saremas 2 CU, evidence is available that all workers receive equal pay for equal job.

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Clause	Indicators	Comply Yes/No	Findings
<p>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).</p>	<p>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.</p>	<p>NO</p>	<p>The employment contracts issued to all Saremas 2 CU workers (local and foreign) have been prepared in Bahasa Malaysia and are available to the workers. The documents have been the prepared and contains all the requirements of the Sarawak Labour Ordinance. Pay conditions are also contained in the employment contracts. The documentation of pay is available in the form of monthly pay slips which are given to all employees.</p>
	<p>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 req.) and payroll documents give accurate info on compensation for all work performed. This includes a form of record for work done by family members.</p>	<p>YES</p>	<p>The employment contracts signed between Saremas 2 CU management and their employees contain the following: employment and payment terms, contract duration, minimum age requirement and retirement age, place of work and job specifications, were made available for review.</p>
	<p>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.</p>	<p>YES</p>	<p>Evidence is available at Saremas 2 Oil Palm Mill that regular working hours as determined by the Sarawak Labour Ordinance and stipulated in employment contracts are being adhered to. Any work in excess of 8 hours are being compensated as overtime. Salary deductions are made accordingly and there are no deductions for foreign workers except for travel documents. Deductions for travel documents has the workers' written request and written approval from the Labour Office.</p>
	<p>6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are 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.</p>	<p>YES</p>	<p>Evidence is available that Saremas 2 CU provides adequate housing and facilities in accordance with the requirements of the Workers' Minimum Standard of Housing and Amenities Act 1990. All workers are provided with free accommodation as stated in their employment contracts, and free electricity and water supplies. All the houses are generally in a good state of repair. Each house has between 2 to 3 rooms, and each room occupied by 1 or 2 persons.</p>

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Clause	Indicators	Comply Yes/No	Findings
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	Saremas 2 CU was able to demonstrate that efforts are taken to improve workers' access to adequate, sufficient and affordable food.
	<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 used as the foundation for the gradual implementation of the living wage payment. • 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</p>	YES	All sampled workers receive at least minimum wages based on Minimum Wages Order 2018. The new Minimum Wages Order 2020 gazetted on 10 Jan 2020 and came into effect on 1 February 2020. However, since this audit was conducted from 24 to 28 February 2020, payment of the new minimum wages could not be verified for February 2020. Saremas 2 CU 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 Calculation Prevailing Wages.

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Clause	Indicators	Comply Yes/No	Findings
	<p>endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid.</p> <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.</p>	NO	<p>Generally, permanent and full-time employees are used to carry out core work such as harvesting, loose fruit collecting, sprayers and manurers.</p> <p>However, a casual worker at Segarmas Plantation is tasked with a job that is not temporary or seasonal in nature. The worker joined Segarmas Plantation in Dec 2018 as a maintenance worker. Until the date of the audit she remains a casual maintenance worker and not listed in Segarmas Master List of Foreign Workers. Therefore, a Minor Non-Compliance NCR No. RZ01 of 2020 was raised.</p>
<p>6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of assoc. and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free assoc. and bargaining for all such personnel.</p>	<p>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.</p>	YES	<p>A published statement recognizing freedom of association is available. These rights include those of personnel to form and join trade unions of their choice, and to bargain collectively. It also states that where the right to freedom of association and collective bargaining is restricted by law, parallel means of independent and free association and bargaining are made available for all such personnel.</p>
	<p>6.3.2 Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p>	YES	<p>There are no trade unions at Saremas 2 CU, but the Workers' Welfare and Social Committees have been established at every unit. The Committee comprise management and worker representatives. Evidence is available that management holds regular meetings with the Workers' Welfare and Social Committees. Meeting minutes between management representatives and workers' representatives were sighted.</p>
	<p>6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p>	YES	<p>Evidence is available that workers' representatives that sit in the Workers' Welfare and Social Committees have been independently and freely elected by the workers themselves. No evidence of any management interference was observed. Records show that worker representatives were nominated by their fellow workers via an election process.</p>
<p>6.4 Children are not employed or exploited.</p>	<p>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.</p>	NO	<p>Saremas 2 CU subscribes to Wilmar's Child Labour Policy. The Policy states that it would not tolerate the use of child or forced labour, nor exploitation of children in any of its global operations and facilities. Wilmar's Child Protection Policy also stated the same commitment. However, it was found during the audit that no prohibition against child labour has been included into service contracts and supplier agreements. All contracts between Saremas 2 CU and its suppliers and contractors do not contain any provisions that prohibit against child labour. Therefore, a Minor Non-Compliance NCR No. RZ03 of 2020 was raised.</p>

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Clause	Indicators	Comply Yes/No	Findings
	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	Evidence is available that minimum age requirements are met. Documented age screening procedure is available from copies of passport and Malaysian NRIC, and copies of Indonesian workers' identity card known as KTP.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	YES	Saremas 2 CU has a guidance document which defines young person as someone between 15 to 18 years of age and is only applicable for employment of local workers. The guidance document also lists out the types of work that can be considered for a young person to be employed. This include house cleaning, weighbridge clerk, gardening, loose fruit picking (excluding loading), FFB checker, filling polybags, EFB mulching, creche helper, sundry shop helper, and line sweeping.
	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	Communication of Wilmar's Child Protection Policy states that the company does not tolerate child labour, any forms of child exploitation and child abuse was given to external stakeholders during stakeholder meeting in Dec 2019. Policy briefings to workers, and during induction trainings for new workers.
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	The Policy known as Sexual Harassment, Violence and Abuse, Reproductive Rights Policy updated 2014 and signed by the Group Plantation Head and Group CSR Head. It defines and gives examples of sexual harassment, violence and abuse, (e.g. where any person is threatened, abused, intimidated or assaulted in his or her employment). This includes physical attacks, threatening behavior, and verbal abuses, written threats of emotional/psychological nature. Sexual harassment as defined in the policy also is an action that can be made either implicitly or explicitly, and or made a term or condition of an individual's continued employment, career advancement or promotion.
	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	A Policy to protect reproductive rights of all, especially women is implemented. This Policy known as Sexual Harassment, Violence and Abuse, Reproductive Rights Policy updated 2014 and signed by the Group Plantation Head and Group CSR Head. The Policy gives the employees the right to decide freely and responsibly of their planning to have children, and to make decisions concerning reproduction free of discrimination, coercion and violence.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to	YES	During this audit, no new mothers were available to verify the Indicator. However, based on interviews held with other female workers who had given birth before, their needs have been taken into account such as providing a private place for expressing milk and access

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Clause	Indicators	Comply Yes/No	Findings
	address the needs that have been identified.		to a fridge for storage, and permission granted enabling them to go home to breastfeed their babies.
	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	Saremas 2 CU has an SOP entitled 'Anti Sexual Harassment'. This SOP provides a reporting form called the 'Grievance/Complaint Form for Sexual Harassment' which could be used by complainants to lodge a report. The SOP also contains the complaint and investigation procedure to handle sexual harassment in the workplace. This SOP were communicated to all staffs and workers during morning muster and training.
6.6 No forms of forced or trafficked labour are used.	<p>6.6.1 (C) All workers have entered into employment voluntarily , and the following are prohibited:</p> <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	<p>Based on interviews conducted with foreign workers, review of documents signed by workers agreeing to voluntarily keep their passports at the estate /mill office, as well as observations made, there is evidence that workers are given an option to either keep their own passports, or to keep them at the office. Those who chose to keep the passports at the office, keep them in locked pigeon holes with one key each kept by the worker, and one by the office. Workers have full access to their own passports and have given written confirmation of their agreement to keep their passports with the office.</p> <p>The Estates and Mill do not charge their workers recruitment fee as mentioned under Indicator 6.1.2 above. There is also no form of contract substitution. All foreign workers interviewed confirmed that while still in their home countries, they were briefed by the recruitment agents of the types of job they would be doing in Malaysia.</p>
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	YES	<p>There is a special labour policy and procedures established known as "Recruitment of Workers". This document spells out the recruitment process from:</p> <ol style="list-style-type: none"> a. Manpower planning – applying for quota, appointment of recruitment agent, sourcing of workers, workers interviews, satisfaction of employability criteria, shortlisting. b. Recruitment process – registration onto the approved Employee Master list and uploaded onto the SAP system. c. Orientation – briefing on language, safety procedures, labour laws, culture practices, surrounding community, housing, medical, amenities, issuance of PPE. d. Commencement of work – no discrimination, no contract substitution practices, post-arrival orientation programme and provision of decent living conditions.
6.7 The unit of	6.7.1 (C) The responsible person(s) for H&S is identified. There are records of	YES	Estate / Mill Managers were appointed as responsible person(s) for safety and health issues and also chairman for OSH Committee. The Manager subsequently assigned

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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>duties of ESH coordinator to the Assistants or healthcare assistant for the down line implementation of ESH practices in the estate and mill. All identified Executives were officially given a letter for such an appointment. Records of regular meetings between the responsible person and workers to discuss about health and safety had been verified to the satisfactory maintained. OSH Committee has been established together. The OSH committee organization chart for 2020 was available. The Estate/Mill Manager is the chairman and the Mill Engineer/Assistant Manager is the secretary. OSH Committee meetings were held once in three months. The minutes of the meeting reviewed.</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.</p>	<p>NO</p>	<p>Emergency Response Plan (ERP) was established since 2009. Random interview with the estate workers showed that they were aware of accident and emergency procedures. Copies of procedures and telephone numbers were sighted on notice boards and muster grounds. First aid training was conducted annually at Saremas 2 POM (30/01/2020), Saremas 2 Estate (20/01/2020), Segarmas (02/08/2019) and Kaminsky (09/01/2020) was sighted and reviewed. Master list of first aid box of all estates and mill which is available at the office was checked and verified. Observed that, first aid box is well provided for all the field mandores whom involved in harvesting, manuring and spraying works. However, during site visit at Kaminsky Plantation B93 (Slashing Work), sighted first aid box was not available. Therefore, Minor NCR DA 04 2020 was raised.</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>PPE issued was raised as follows: 1) During interview with sampled harvesters and verification of "PPE Personal Record", there is no free of charge provided for personal protective equipment i.e. harvesters shoe. 2) During site visit at Segarmas Plantation B051 (Division 2), sighted 1 manurer did not wear appropriate PPE i.e. clinical mask. Thus, Major DA 05 2020 has been issued.</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>YES</p>	<p>Local & Foreign workers are covered by SOCSO (Pertubuhan Keselamatan Sosial).</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	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. Sighted the Saremas 2 CU has maintained and updated the LTA Summary by monthly basis.

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 2 Estate, Segarmas Plantation Sdn Bhd and Kaminsky Sdn Bhd continued to implement IPM as per Agricultural Manual and Standard Operating Procedure for Oil Palm (Chapter 8: Plant Protection-Pest and Disease Management). In order to minimize the use of pesticides, all 3 units had planted beneficial plants mainly <i>Tunera subulata</i> , and some <i>Antigonon leptopus</i> with maps indicating areas planted. The visited units had in place documented IPM plans which covered Monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides. The estates continued to carry out monthly detection and observation of leaf eating pests, mammalian pests and diseases like <i>Ganoderma</i> and Stem Rot. These monthly detection and observations were carried by staff and records of observation were sighted. Records showed no outbreak had been taken place.
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	YES	There was no evidence that species referenced in the Global Invasive Species Database and CABI.org are to be used in managed areas, as per site visited and as per the stakeholder consultation with relevant workers.
	7.1.3 There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	YES	Wilmar Internal Limited had a policy of no open burning. As advocated, both estates practised Zero burning thus no use of fire for pest control. In the 2019 replants visited during the audit in both estates, 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,	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.	YES	Justification of all pesticides used had been demonstrated. The use of selective products that are specific to the target pest, weed or disease had been demonstrated in: <ul style="list-style-type: none"> i. SPO Manual – page 1-6 Justification in SOPs on the use of Agrochemicals ii. Agriculture Manual – Chapter 6 -upkeep and maintenance of oil palm. iii. Agriculture Manual - Chapter 8: Plant Protection-Pest and Disease Management

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Clause	Indicators	Comply Yes/No	Findings
communities or the environment.	7.2.2 (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	YES	All 3 estates continued to record areas where pesticides had been used. Pesticides are used only when justified and areas used are recorded in store issue chits, bin cards, program sheets, SAP system, costing records and progress reports. Records of pesticides used by area, quantity used, hectares applied and Ai/Ha were made available to auditors. LD50 were in the MSDS.
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	YES	The CU as per the IPM plan continued to manage pests, other than weeds, at below threshold levels. No prophylactic spraying had been carried on all 3 units. The units, in order to minimise pesticide usage, do not carry out calendar baiting of rats. Rat baiting was carried out as and when required and only in areas where census showed damage above threshold level.
	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 any prophylactic use of pesticides in Oil Palm planted area. Saremas 2 CU had complied with the requirement as per Chapter 8 of Wilmar International Limited Agriculture Manual & Standard Operating Procedure for Oil Palm 3/2011. As per Chapter 8, prophylactic use of pesticides was only in the Oil Palm Nursery and only for Fungicides and not for any other pesticide.
	7.2.5 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:	YES	During the audit, it was noted that Segarmas 2 Estate, Segarmas Plantation Sdn Bhd and Kaminsky Estate had not use chemicals categorized as World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions. Except for Amine and Cypermethin which were Class II chemicals, all others were of Class III & IV. Paraquat has not be used since 2008 and was replaced by a systemic herbicide and glufosinate ammonium.
	7.2.5a Judgment of the threat and verify why this is a major threat.	YES	
	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	

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Clause	Indicators	Comply Yes/No	Findings
	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 Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	YES	The estates and mill have the SOP for use of PPE during working. All workers involved in pesticide application were provided with appropriate PPE and replaced when damaged. PPE issue and replacements records were verified by the auditors. It was also observed that PPE was used by workers working in the fields. The estate and mill had a SOP for handling of chemical/pesticides. The employees involved in the chemical handling such as the storekeepers, sprayers, fertilizer and rat bait workers were trained in chemical handling and they understood the hazards of the chemicals and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to them through the SDS training.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	The storage of pesticides at Saremas 2 CU was found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	Empty pesticide containers was punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. Inventory and consignment documents verified for confirmation of proper management and disposal. The scheduled wastes generated at Saremas 2 CU not more than 180 days @ 20mt.
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	YES	There was no evidence to show that all 3 Estates had practiced any aerial spraying.
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	YES	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	YES	All 3 Estates continued to comply with <i>Penyemburan Racun</i> where no work with pesticides was given to pregnant or breast-feeding women. List of sprayers were maintained by all 3 estates and mill. Identification of pregnancy was done at the estate's clinics during the monthly medical check-up and interview with female workers. Pregnancy test was conducted on doubtful cases.

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Clause	Indicators	Comply Yes/No	Findings									
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	Saremas 2 CU, sighted Waste and Pollution – Identification, Prevention, Mitigation and Improvement Plan that applicable for all estates. The estates have identified and documented type of waste that generated from its operation in a Waste Management Plan 2019. The waste management plan has also identified source of pollution, possible waste/pollution, effected environment, prevention, mitigation and enhancement. Other sources of pollutions are also listed in the Waste Management Plan such as workshop, line-site, office, store, canteen, replanting area and etc.									
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	YES	Standard Operating Procedure Scheduled Waste Disposal has been established. The documentation and identification of all waste product such as scheduled wastes, domestic wastes, clinical wastes, recyclable wastes such as metal, tins, plastics, bottles, mill wastes and polluting material e.g. EFB and POME.									
	7.3.3 The unit of certification does not use open fire for waste disposal.	YES	During site visit at all units of certification, there was no evidence of open fire has been used for waste disposal. All domestic wastes (household and food waste only) at Saremas 2 CU has been disposed via landfill.									
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	Fertiliser application was of paramount importance for maintenance of soil fertility and the estates continued to apply fertilisers as per EMU recommendations made by Head of R&D Department. In addition, all 3 Estates, Saremas 2 Estate, Segarmas Plantation Sdn Bhd and Kamisky Sdn Bhd continued to manage soil fertility as per the SOPs in the Agriculture Manual. Soil fertility had been managed by recycling of bio-mass like frond stacking and EFB application (in some areas), water management in low lying areas, maintenance of soft weeds, LCC and <i>Nephrolepis biserrata</i> in the interline. Annual Fertiliser recommendations are made based on annual foliar sampling.									
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	YES	Records showed that the estates continued to carry out periodic foliar and soil sampling to monitor changes in nutrient status. Annual foliar sampling, as for the SOP of EMU, for the nutrients N, P, K, Mg, Ca & B had been carried out accordingly.									
	7.4.3 A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	YES	All 3 Estates had a nutrient recycling strategy in place. Palm fronds were stacked in the fields to decompose and by EFB application. There was no POME application in all 3 Estate. POME was used for Methane capture at the POM.									
	7.4.4 Records of fertiliser inputs are maintained.	YES	All 3 Estates continued to maintain records of fertiliser inputs. Records of programs and applications of fertilisers were made available to auditors. Records showed that the main fertilisers applied in 2019 were NPK, NPK Super, NK1, NK2, Kieserite, Kiesebor, & GML.									
7.5 Practices minimise and control erosion and degradation of	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	YES	Based on the soil maps of Param Agricultural Soil Survey (M) Sdn. Bhd. in 2007 the soil series were: <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td>Saremas 2 Estate</td> <td>Segarmas Plantation</td> <td>Kaminsky Plantation</td> </tr> <tr> <td>Bedup</td> <td>Bedup</td> <td>Bedup</td> </tr> <tr> <td>Bekenu</td> <td>Bekenu</td> <td>Bekenu</td> </tr> </table>	Saremas 2 Estate	Segarmas Plantation	Kaminsky Plantation	Bedup	Bedup	Bedup	Bekenu	Bekenu	Bekenu
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RSPO PUBLIC SUMMARY

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	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	No replanting of any individual, contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification was observed during the audit. The CU practiced soil erosion control by constructing terraces in all sloping areas with bund at regular interval of 20 meters to retain water. This was observed in the 2019 replant where replanting was in progress.																																																
	7.5.3 There is no new planting of oil palm on steep terrain.	YES	Auditors have verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all three estates. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at Saremas 2 CU.																																																
7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.	7.6.1 (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	YES	As per all PPB Estates, to demonstrate the long-term suitability of land for palm oil cultivation, Saremas 2 CU have conducted soil surveys identifying marginal and fragile soils, and terrain surveys including steep terrain.																																																
	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	YES	Extensive planting on marginal and fragile soils, was avoided by the Estates. There were no fragile/marginal soils in Saremas 2 Estate and Segarmas Estate. On Kaminsky there was a small area of 32.59 Ha (Block 33 & 34) planted on peat soils.																																																
	7.6.3 Soil surveys and topographic information guide the planning of drainage	YES	Auditors have verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all three estates. Based on the audit findings, it is																																																

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Clause	Indicators	Comply Yes/No	Findings
	and irrigation systems, roads and other infrastructure.		confirmed that there were no new planting or new development of areas at Saremas 2 CU.
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 have verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all three estates. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at Saremas 2 CU.
	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).	YES	Areas of peat within the managed areas were inventoried, documented and reported to RSPO Secretariat. Evidence was sighted that the Report along with maps etc. was sent to RSPO Secretariat by the Senior Manager Sustainability in Nov 2019.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	YES	Kaminsky Sdn Bhd which has 32.59 Ha of Peat Soils continued to be monitored on its subsidence. During the visit the site of the subsidence pole, piezometer and water level marker was checked and found in order.
	7.7.4 (C) A documented water and ground cover management programme is in place.	NO	At time of visit no documented water and ground cover management program was available. Thus, the Major NCR STK 02 2020 was issued.
	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 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.	YES	As per RSPO guidance, Drainability Assessment is not required in Malaysia for planting on contiguous areas of peat less than 40 hectares. Peat area in Kaminsky Sdn Bhd is only 32.59 Ha, hence this indicator is not applicable.

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	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.		
	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.	YES	On Saremas 2 CU there is on a small area (32.59 Ha) of peat soils in Kaminsky Sdn Bhd. The area was managed Wilmar Best Practices and Standard Operating Procedure for Management of Existing Oil Palm Cultivation on Peat Soils together with the RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat.
	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.	YES	On Kaminsky Sdn Bhd there were no unplanted and set-aside peatlands in the managed area.
7.8 Practices maintain the quality and availability of surface and groundwater.	7.8.1 A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:	YES	All 3 Estates had in place a water management plan to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. Attention was given to water quality, quantity, and consumption usages.
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	YES	Based on stakeholder consultation with local communities and field visit, there was evidence that the CU does not restrict access to clean water or contribute to pollution of water used by communities.
	7.8.1b Workers have adequate access to clean water.	YES	As verified at SOU facilities for workers and through interview with workers, all workers have obtained adequate access to treated clean water. Cleanliness of drinking water

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			supplied to worker was ensure by carrying water analysis. Drinking water quality has been monitored by a third party lab. Results from analysis were showed all the parameters within the limits.												
	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' (Apr'17).	NO	There is no evidence that water courses within Saremas 2 CU is being protected. There is also no evidence of maintenance and restoration of buffer zones along natural waterways. Sighted during site visit at Saremas 2 buffer zones, present natural vegetation has been removed for water catchment purposes. Therefore, Major NCR DA 06 2020 was raised.												
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.	YES	Effluent license renewal application for year 2019/2020 and letter from Department of Environmental was sighted. An Effluent Treatment Plant is available at Saremas 2 POM to treat the POME. According to DOE's license, the disposal method of the final discharge is through water course (currently channel to biogas plant). The ETP was regularly maintained by desludging of the ponds to ensure its efficiency. Final discharge samples were taken on monthly basis and sent to an accredited laboratory for analysis. The results of analysis were submitted to the DOE on quarterly basis. All parameters were within the regulatory limit such as BOD discharged to water course was not more than 20 mg/l.												
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	Process water is obtained from water catchment near to the mill. The water usage per tonne of fresh fruit bunches (FFB) continued to be monitored on monthly basis.												
7.9 Efficiency of fossil fuel use and the use of renewable energy is optimised.	7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented.	YES	The plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented. Record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement.												
7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.	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	The CU had used RSPO Palm GHG version 4.0 Calculator as a tool to calculate the GHG emissions. Sighted report sends to RSPO on 09/03/2020. The input data was verified and the following were determined: <table border="1" data-bbox="1070 1093 1984 1212"> <thead> <tr> <th>Description</th> <th>tCO₂e/tProduct</th> <th>Production</th> <th>t/yr</th> </tr> </thead> <tbody> <tr> <td>CPO</td> <td>0.56</td> <td>FFB Processed</td> <td>123324.73</td> </tr> <tr> <td>PK</td> <td>0.56</td> <td>CPO Processed</td> <td>27095.342</td> </tr> </tbody> </table>	Description	tCO ₂ e/tProduct	Production	t/yr	CPO	0.56	FFB Processed	123324.73	PK	0.56	CPO Processed	27095.342
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			Total	13864.49	1.25	0.11
			Palm Oil Mill Effluent (POME) Treatment			
			Diverted to compost		0%	
			Diverted to anaerobic digestion		100%	
			Diverted to Anaerobic Digestion			
			Diverted to anaerobic pond		0%	
			Diverted to methane capture (flaring)		0%	
			Diverted to methane capture (electricity generation)		100%	
	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).	YES	Auditor has verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to the sampled estates areas. Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at Saremas 2 CU. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.			
	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	YES	Saremas 2 CU had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation. The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adverse impact the environment., Fuel Consumption, Peat Oxidation, POME and reported in the PalmGHG Summary Report.			
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	Wilmar International Limited had a policy that Fire is not used for preparing land: it was in their "No Deforestation, No Exploitation Policy" which was updated in November 2019 and signed by its Chairman & Chief Executive Officer. All 3 estates had complied with the policy.			
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	Saremas 2 CU had established fire prevention and control measures for the areas under its direct management. In the mill there water hydrant and valid fire extinguishers at the various operating stations.			
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	YES	The CU had not practiced any open burning and there was no evidence to show that fire had been used for preparing land for replanting activity. The SOU also engaged with adjacent to stakeholder on fire prevention and control measures by inviting them to join training.			

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Clause	Indicators	Comply Yes/No	Findings
<p>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.</p>	<p>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.</p>	<p>YES</p>	<p>Auditors has verified through checking through www.globalforestwatch.com, Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Saremas 2 CU since Nov 2005.</p>
	<p>7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:</p>	<p>YES</p>	<p>Auditors has verified through checking through www.globalforestwatch.com, Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Saremas 2 CU since Nov 2005.</p>
	<p>7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p>	<p>YES</p>	
	<p>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.</p>	<p>YES</p>	<p>Auditors has verified through checking through www.globalforestwatch.com, Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Saremas 2 CU since Nov 2005.</p>
	<p>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</p>	<p>YES</p>	<p>Auditors has verified through checking through www.globalforestwatch.com, Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Saremas 2 CU since Nov 2005.</p>

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Clause	Indicators	Comply Yes/No	Findings
	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).		
	7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	YES	Auditors has verified through checking through www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Saremas 2 CU since Nov 2005.
	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	The CU has conducted the HCV assessment in July 2008. The assessment had covered all the HCV on RTEs species within the residual forested areas of the estates. The identified HCV areas included the steep logged over hill dipterocarp forest of Bukit Durang Conservation Area (HCV4). For 2019, the CU has conducted "Scoping Study of the Proposed Conservation Areas Plantations in Wilmar Sarawak, Malaysia". A field survey primarily focused on assessing the general ecology of the proposed conservation values that are present or potentially present, potential intact forest with high carbon stock and the treats to the areas that might occur. Programmes to continuously educate their employees on RTE species were in place. In accordance with the company rules, appropriate disciplinary measures will be taken against any employees found capturing, harming, collecting or killing these species.
	7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	YES	Based on the Scoping Study of the Proposed Conservation Areas Plantations in Wilmar Sarawak, Malaysia. RTEs are present within the Saremas 2 Certification Unit. Measures taken to maintain and/or enhance the RTEs are contained in the action plan.
	7.12.8 (C) Where there has been land	YES	Auditors has verified through checking through www.globalforestwatch.com , Google Maps,

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Clause	Indicators	Comply Yes/No	Findings
	clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.		Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Saremas 2 CU since Nov 2005.

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Clause	Indicators	Comply Yes/No	Findings
4.5.3 Time-bound plan Note: Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised;	(a)	As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	YES 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	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.

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		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);		
4.5.4 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. Any new plantings since 1 st January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	YES	<p>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:</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 Feb. 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
	(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	There is no report or issues raised in relation to land conflicts. 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.

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				<p>The copies of legal ownership of the land for Saremas 2 estate was verified. The estate was confirmed to be operating on land of with legitimate status. The Saremas 2 Estate hosts the site of the Saremas II Mill complex. Details as follows;</p> <p>The documents related to the right to use the land was made available to the audit team. Records of ownership were maintained at respective estate's office. This plantation area was previously owned by Sarawak State Government.</p>
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3;	YES	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.
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	YES	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.
	(e)	<p>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:</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 	YES	<p>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 of the following i.e.</p> <ul style="list-style-type: none"> a) Indonesia Units b) Arica Units c) Malaysia Units <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</p>

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		<p>requirement;</p> <ul style="list-style-type: none"> ▪ Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. ▪ Desktop study e.g. web check on relevant complaints. ▪ If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements. 		<p>report for all uncertified management units. There was no non-compliance found for all requirements during this audit.</p>
<p>4.6.4 The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p>		<p>No additional indicators</p>	<p>YES</p>	<p>The copies of legal ownership of the land for Saremas 2 estate was verified. It was confirmed that the estates were operating on land of with legitimate status. The Saremas 2 Estate hosts the site of the Saremas II Mill complex. The documents related to the right to use the land was made available to the audit team. Records of ownership were maintained at respective estate's office. This plantation area was previously owned by Sarawak State Government. It was confirmed that there were no issues related to the rights of local communities and indigenous people.</p>
<p>Note:</p> <ol style="list-style-type: none"> 1. For requirements 4.5.4 (a)-(d) above, the definition of major and minor NC is stated in the RSPO P&C. For example, if an NC against a major indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless that is actively addressed; 2. Failure to address any outstanding NC within uncertified unit(s) regarding 4.5.4 (a)-(d) may lead to certificate suspension(s) to the certified unit(s), in accordance with the provisions of these Certification Systems. 				

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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
1.1.5 RZ 02 2020	Minor	Finding: Stakeholder list of Saremas 2 CU is incomplete. Objective evidence: Stakeholder lists at Saremas 2 CU are incomplete because: a. The lists do not contain nominated representatives for suppliers and government agencies; b. Sarawak Dayak Iban Association (SADIA), the Sarawak NGO representing the local communities from Jambatan Suai in their land claim has not been listed as a stakeholder.	Document controller has updated their respective stakeholder list as per NCR has been highlighted.	Corrective action plan accepted. Status: Open The effectiveness of the corrective action plan will be verified during next audit
2.1.1 DA 01 2020	Major	Finding: The unit of certification not complies with Environmental Quality (Scheduled Wastes) Regulations 2005, refer to Regulation 10. Labelling of scheduled wastes. Objective evidence: During site visit at Contractor (Lata Sehijau Transport CO.) Workshop (Saremas 2 Estate), sighted no labelling of SW 305.	Corrective action plan taken by CU: 1) To conducted the awareness training on scheduled wastes regulation and management to the contractors. 2) To labelling the spent lubricant oil drum as SW 305.	Auditor has verified the evidences attached of training report (Scheduled Wastes Management Training). Sighted the training was conducted on 25/03/2020 to Contractor (Lata Sehijau Transport CO.). Besides that, sighted also picture of labelling the spent lubricant as SW 305 has been implemented. Status: Closed The implementation of corrective action will be verified by next audit.
2.2.2 RAR 01 2020 RZ 06 2020	Minor	Finding: Compliance with applicable legal requirement was not demonstrated by the contractors. Objective evidence: Evidence of all contracted third parties related to insurance covered for foreign and local workers was not at available i.e.: Segarmas Estate	Management has keep the copy of evidence of document submission for insurance cover to all contractor workers.	Corrective action plan accepted. Status: Open The effectiveness of the corrective action plan will be verified during next audit

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		<p>-Lee Transport – 4 foreign workers & 1 local workers. Kaminsky Estate -Lai Lai Transportation CO – 1 foreign worker</p> <p>Finding: No legal due diligence was done before engaging P.T. Persada Duta Utama, recruitment agent engaged by Saremas 2 CU. Objective evidence: As admitted by Kusma Dalle, the representative of P.T. Persada Duta Utama, the representatives are in Malaysia on a social visit pass, and has no valid work permit to carry work as a recruitment agent.</p>	<p>Corrective action plan taken by CU: 1) The meeting on the legal due diligence has conducted with P.T. Persada Duta Utama to ensure he understand on legal requirement. 2) The manager of P.T. Persada Duta Utama has signed the company business of ethic and commit to renew his work permit.</p>	<p>Corrective action plan accepted.</p> <p>Status: Open The effectiveness of the corrective action plan will be verified during next audit</p>
2.2.3 RAR 02 2020	Minor	<p>Finding: Clause disallowing child, forced and trafficked labour and where young worker are employed are protected was not include in the contracts. Objective evidence: During site visit at Saremas 2 Certification Units, sighted that all contract agreement between management and contractor was not include Clause disallowing child, forced and trafficked labour and where young worker are employed are protected.</p>	<p>Management has produce the business code of ethic which include the required clause and asking the contractor to sign and follow accordingly to the procedure.</p>	<p>Corrective action plan accepted.</p> <p>Status: Open The effectiveness of the corrective action plan will be verified during next audit</p>
3.1.3 STK 01 2020	Minor	<p>Finding: Internal audit procedure Document No.: PPB/PRO 12/(03)/0212 was not complied with. Objective evidence: On Saremas 2, Sergamas Plantation Sdn Bhd and Kaminsky Sdn Bhd there were no records to show that RSPO P & C MYNI 2019 Internal Audits and management reviews had been conducted.</p>	<p>The internal audit checklist has been transfer / updated as RSPO P&C MYNI 2019 and Management Review meeting has been conducted by each estate representative.</p>	<p>Corrective action plan accepted.</p> <p>Status: Open The effectiveness of the corrective action plan will be verified during next audit</p>
3.3.2 RZ 05 2020	Minor	<p>Finding: Instructions given during meeting not consistently implemented. 2. Recruitment of workers Policy not implemented. Objective evidence: 1. Instructions and briefings given during Women and Children Committee meeting dated 30 Oct 2019 and 17 May 2019 that parents should not send sick children to the crèche was not implemented when a sick and coughing child was seen present at the Saremas 2 crèche. 2. At least two migrant workers at the Saremas 2 Palm Oil Mill (Worker No. RM/SMP2/0819/438</p>	<p>Corrective action plan taken by CU: 1) Saremas 2 Management has produce the memo on sick children including women representative and been display at the crèche. The memo also has been brief to all the women and crèche ayah. 2) Saremas 2 POM has given warning letter to the recruitment agent P.T. Persada Duta Utama and ask them to pay back to the workers.</p>	<p>Corrective action plan accepted.</p> <p>Status: Open The effectiveness of the corrective action plan will be verified during next audit</p>

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		and RM/SMP2/0819/442) have been asked to pay to the agents and/or representatives of P.T. Persada Duta Utama the sum of RM1,800 and RM2,200 respectively.		
3.4.3 DA 02 2020	Major	Finding: The environmental management and monitoring plan was not fully implemented. Objective evidence: Control measures for maintenance of vehicle and equipment activities was not fully implemented. During site visit at Contractor (Lata Sehijau Transport CO.) Workshop Saremas 2 Estate, sighted oil spillage near to watercourse.	Corrective action plan taken by CU: 1) Saremas 2 Estate has produce the “Stop Work Order Notice” to the contractor Lata Sehijau workshop and has been agreed by them. The workshop has been permanently closed and the contractor services has been done at estate workshop. 2) The oil spillage has been recovery immediately.	Auditor has verified the evidences attached of “Stop Work Order Notice” to the contractor Lata Sehijau dated 16/03/2020. Besides that, sighted picture attached of oil spillage recovery has been done at the workshop. Status: Closed The implementation of corrective action will be verified by next audit.
3.6.1 DA 03 2020	Major	Finding: 1) Certain activities for risk control was not monitored and assessed 2) Safety mitigation plans are not implemented and monitored Objective evidence: 1) The HIRARC form for risk control replanting activities i.e. planting palm and nursery activities was not monitored and assessed. 2) During site visit at Saremas 2 Estate Contractor (Lata Sehijau Transport CO.) Workshop, sighted an acetylene tanks which was not chained and fixed securely causing the risk of an explosion.	Corrective action plan taken by CU: 1) The safety committee team has reassessed the HIRARC for replanting and nursery activities. 2) Saremas 2 Estate has conducted basic safety and health training to the contractor and acetylene tank has been chained.	Auditor has confirmed the evidences attached of amended HIRARC form dated 29/02/2020 for replanting and nursery activities. Sighted also evidences attached of training report and attendances list for Safety & Environemnt Training. The training was conducted to the Latar Sehijau Transport contractor dated 25/03/2020. Besides that, pictures attached of acetylene tank has been chained has been verified. Status: Closed The implementation of corrective action will be verified by next audit.
4.1.1 RZ 04 2020	Major	Finding: The policy to respect human rights and prohibiting retaliation against HRD has not been communicated. Objective evidence: There is nil to low understanding of what HRD is and the prohibition against retaliation against HRDs among all levels of workforce and local communities. There is no record that the policy has been communicated to all levels of the workforce, operations, FFB suppliers and local communities.	The PIC has conducted the HRD and Human Right Policy to all levels of the workforce, operations, FFB suppliers and local communities. Saremas 2 Estate: 07/04/2020 & 03/04/2020 Kaminsky Plantation: 03/04/2020 Segarmas Plantation: 02&03/04/2020 Stakeholder/local communities: 02/04/2020 FFB suppliers/SPOM2: 01/04/2020	Auditor has verified the evidences attached of training report and attendances list for HRD and Human Right Policy was conducted to all levels of the workforce, operations, FFB suppliers and local communities. Saremas 2 Estate: 07/04/2020 & 03/04/2020 Kaminsky Plantation: 03/04/2020 Segarmas Plantation: 02&03/04/2020 Stakeholder/local communities:

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				02/04/2020 FFB suppliers/SPOM2: 01/04/2020 Status: Closed The implementation of corrective action will be verified by next audit.
6.2.7 RZ 01 2020	Minor	Finding: A casual worker at Segarmas Plantation is tasked with a job that is not temporary or seasonal in nature. Objective evidence: Worker No. SG/SGE/0119/1676 joined Segarmas Plantation on 20 Dec 2018 as a maintenance worker. Until the date of the audit she remains a casual maintenance worker and has no employment contract, no work permit and not listed in Segarmas Master List of Foreign Workers.	The legalise letter has been submitted on 16 & 24 May 2019 by Labour Department. The workers No. SG/SGE/0119/1676 has signed contract and her name has been insert into Segarmas Master List.	Corrective action plan accepted. Status: Open The effectiveness of the corrective action plan will be verified during next audit
6.4.1 RZ 03 2020	Minor	Finding: No prohibition against child labour has been included into service contracts and supplier agreements. Objective evidence: All contracts between the Saremas 2 CU and its suppliers and contractors do not contain any provisions that prohibit against child labour.	Saremas 2 CU has produced the Business Code of Ethic which include clause prohibit against child labour and ask the service suppliers and contractors to signed. Briefing also has been done all parties.	Corrective action plan accepted. Status: Open The effectiveness of the corrective action plan will be verified during next audit
6.7.3 DA 04 2020	Major	Finding: 1) Workers use appropriate personal protective equipment (PPE), was not provided free of charge to workers at the place of work to cover all potentially hazardous operations. 2) Workers did not wear the appropriate personal protective equipment (PPE). Objective evidence: 1) During interview with sampled harvesters and verification of "PPE Personal Record", there is no free of charge provided for personal protective equipment i.e. harvesters shoe. 2) During site visit at Segarmas Plantation B051 (Division 2), sighted 1 manurer did not wear appropriate PPE i.e. clinical mask.	Corrective action plan taken by CU: 1) The HIRARC has been assessed again and produce the proper indicator where management has agreed to provide the PPE (Shoe) to the harvester. 2) Training has been conducted to all manure team on use of appropriate PPE.	Auditor has verified evidences attached of documents amended HIRARC form for harvesting activities and picture distribution free harvester shoes to all harvesters at all estates CU. Verified also Segarmas Plantation training report and attendance list for PPE Manuring Training has been conducted on 30/03/2020. The training given by Mr. Harrison and attended by 7 workers. Status: Closed The implementation of corrective action will be verified by next audit.

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<p>7.7.4 STK 02 2020</p>	<p>Major</p>	<p>Finding: A documented water and ground cover management program was not in place. Objective evidence: On Kaminsky Sdn Bhd at time of audit no documented water and ground cover management program was available for the peat area of 32.59 Ha in Blocks 033 & 034.</p>	<p>EMU Team and Kaminsky PIC has reviewed and produced the water and ground cover management program.</p>	<p>Auditor has verified evidences attached of documents “2 Years Water and Ground Cover Management Plan in Oil Palm Planted on Peat for Kaminsky Estate Program FY 2020-2021”.</p> <p>Status: Closed The implementation of corrective action will be verified by next audit.</p>
<p>7.8.2 DA 05 2020</p>	<p>Major</p>	<p>Finding: Water courses and wetlands are not protected including maintaining and restoring appropriate riparian and other buffer zones Objective evidence: There is no evidence that water courses within Saremas 2 CU is being protected. There is also no evidence of maintenance and restoration of buffer zones along natural waterways. Sighted during site visit at Saremas 2 buffer zones, present natural vegetation has been removed for construction of water catchment.</p>	<p>Corrective action plan taken by CU: 1) The disturb riparian area has been rehabilitated and restore with trees and <i>Vertiger grass</i> along the river bank. 2) The riparian boundary peg has been erect along the riverbank. 3) Briefing on the awareness riparian zone to the management and workers has been conducted on 28/03/2020.</p>	<p>Auditor has verified evidences attached of pictures of disturb riparian area has been rehabilitate and restore with trees and <i>Vertiger grass</i> along the river bank. and the riparian boundary peg has been erect along the riverbank. Sighted also “Awareness Talk on Riparian Zone” was conducted on 28/03/2020.</p> <p>Status: Closed The implementation of corrective action will be verified by next audit.</p>
<p>Supply Chain 5.5.2 RAR 03 2020</p>	<p>Major</p>	<p>Finding: There is no explicit procedures for the outsourced process Objective evidence: There is a procedure for RSPO SCCS was established. However, there is no explicit procedures for the outsourced process.</p>	<p>Outsourced procedure for Saremas 2 POM is revised for inclusion into supply chain procedure referencing the agreement contract with the outsourced contractors on the related explicit procedures.</p>	<p>Auditor has verified evidences attached of documents revision RSPO Supply Chain Certification Procedure dated 01/02/2020. The revision has included explicit procedures for the outsourced process under clause 4 Outsourcing.</p> <p>Status: Closed The implementation of corrective action will be verified by next audit.</p>

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Attachment 5

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED (SPECIAL AUDIT MYNI 2019)

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Verification by Assessor
<p>MYNI 2019 3.3.1</p> <p>MYNI 2014 4.4.1</p> <p>MAR 01 2020</p>	<p>Major</p>	<p>Finding:</p> <p>1) There were no SOP for monitoring of the pregnancy checkup and child delivery at Saremas 2 CU.</p> <p>2) There were no SOP on monitoring of contractors' workers at Saremas 2 CU.</p> <p>Objective evidence:</p> <p>1) Based on the interview conducted with Medical Assistant at Segarmas Estate Clinic, there was no proper monitoring of the pregnancy checkup and child delivery.</p> <p>2) The monitoring mechanism also did not include the SOP and Policy for maternity leave and allowance as provided in document no. PPBOP/SOP/091219 dated 9 December 2019. During site visit at mill and estate, there were no evidence of documented SOP on monitoring of contractors' workers at Saremas 2 CU i.e. insurance and legality.</p>	<p>It has been verified during this audit that:</p> <p>i. A Standard Operating Procedure known as Maternity Leave and Allowance Procedure & Policy Doc No. PPBOP/SOP/091219 (1) approved by the Plantation Head dated 9 Dec 2019 has been established. This policy is applicable throughout the Wilmar Group in Sabah & Sarawak.</p> <p>ii. A procedure to manage pregnant mothers, check-up and delivery has also been established known Management of Pregnant Mothers at Kamisky Estate Clinic.</p> <p>iii. There were SOP on monitoring of contractors' workers at Saremas 2 CU Doc No. PBB/ESH/SOP10/2(2020), approved by AGM which is SOP for Monitoring of Contractors' Workers. This SOP is applicable to all estates and mill.</p> <p>Status: Closed</p>

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

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Verification by Assessor																														
<p>MYNI 2014 2.1.1</p> <p>MYNI 2019 2.1.1</p> <p>STK 01 2019</p>	<p>Major</p>	<p>Finding: Evidence of compliance with relevant legal requirements was not available</p> <p>Objective evidence:</p> <p>1. Segarmas Estate: The Work Permit of the worker observed applying fertiliser in Block 045, Emiliati (Passport No. AT 597198), had expired on 20.02.2019.</p> <p>2. Kaminsky Sdn Bhd – The Work Permit of the worker observed working in the Oil Palm Nursery, Mirna Jama (Passport No. AT 237818), had expired on 06.04.2019</p>	<p>It was verified during this recertification audit that all workers sampled below have valid work permits.</p> <table border="1" data-bbox="1263 475 1727 1139"> <thead> <tr> <th data-bbox="1263 475 1384 547">Estate</th> <th data-bbox="1384 475 1603 547">Passport No/Validity</th> <th data-bbox="1603 475 1727 547">Work Permit Validity</th> </tr> </thead> <tbody> <tr> <td data-bbox="1263 547 1384 619">Saremas 2</td> <td data-bbox="1384 547 1603 619">Passport No. AT853524/25 Feb 2020</td> <td data-bbox="1603 547 1727 619">14/7/20</td> </tr> <tr> <td data-bbox="1263 619 1384 691">Saremas 2</td> <td data-bbox="1384 619 1603 691">Passport No. AU519819/6 April 2024</td> <td data-bbox="1603 619 1727 691">7/6/20</td> </tr> <tr> <td data-bbox="1263 691 1384 762">Saremas 2</td> <td data-bbox="1384 691 1603 762">Passport No. U658141/10 April 2024</td> <td data-bbox="1603 691 1727 762">7/6/20</td> </tr> <tr> <td data-bbox="1263 762 1384 834">Segarmas</td> <td data-bbox="1384 762 1603 834">Passport No. B2694445/30 May 2020</td> <td data-bbox="1603 762 1727 834">18/6/20</td> </tr> <tr> <td data-bbox="1263 834 1384 906">Segarmas</td> <td data-bbox="1384 834 1603 906">Passport No. C2139361/21 Nov 2023</td> <td data-bbox="1603 834 1727 906">4/12/20</td> </tr> <tr> <td data-bbox="1263 906 1384 978">Segarmas</td> <td data-bbox="1384 906 1603 978">Passport No. B3509268/22 March 2021</td> <td data-bbox="1603 906 1727 978">2/9/20</td> </tr> <tr> <td data-bbox="1263 978 1384 1050">Kaminsky</td> <td data-bbox="1384 978 1603 1050">Passport No. AT732520/6 Nov 2021</td> <td data-bbox="1603 978 1727 1050">20/7/20</td> </tr> <tr> <td data-bbox="1263 1050 1384 1121">Kaminsky</td> <td data-bbox="1384 1050 1603 1121">Passport No. AU048024/5 Aug 2020</td> <td data-bbox="1603 1050 1727 1121">11/5/21</td> </tr> <tr> <td data-bbox="1263 1121 1384 1139">Kaminsky</td> <td data-bbox="1384 1121 1603 1139">Passport No. B4690506/16 Sept 2021</td> <td data-bbox="1603 1121 1727 1139">28/11/20</td> </tr> </tbody> </table> <p>Status: Closed</p>	Estate	Passport No/Validity	Work Permit Validity	Saremas 2	Passport No. AT853524/25 Feb 2020	14/7/20	Saremas 2	Passport No. AU519819/6 April 2024	7/6/20	Saremas 2	Passport No. U658141/10 April 2024	7/6/20	Segarmas	Passport No. B2694445/30 May 2020	18/6/20	Segarmas	Passport No. C2139361/21 Nov 2023	4/12/20	Segarmas	Passport No. B3509268/22 March 2021	2/9/20	Kaminsky	Passport No. AT732520/6 Nov 2021	20/7/20	Kaminsky	Passport No. AU048024/5 Aug 2020	11/5/21	Kaminsky	Passport No. B4690506/16 Sept 2021	28/11/20
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<p>MYNI 2014 4.1.1</p> <p>MYNI 2019 3.3.1</p> <p>STK 02 2019</p>	<p>Major</p>	<p>Finding: Standard Operating Procedure (SOP) for Peat Soil Management was not available.</p> <p>Objective evidence: Kaminsky Sdn Bhd – For management of Peat Soils in Blocks 33 & 34, there was no Standard Operating Procedure (SOP) established and documented at time of visit.</p>	<p>Standard Operating Procedure (SOP) for Peat Soil Management had been established and documented; Wilmar Best Practices and Standard Operating Procedure for Management of Existing Oil Palm Cultivation on Peat Soils dated 13/06/2019 and signed by the Agronomist was available.</p> <p>Status: Closed</p>
<p>MYNI 2014 4.1.3</p> <p>MYNI 2019 3.3.3</p> <p>RZ 04 2019</p>	<p>Minor</p>	<p>Finding: The same issue identified during housing inspections at the Saremas 2 Palm Oil Mill has been recurring since April 2018 until 6 April 2019.</p> <p>Objective evidence: The housing inspection form of Saremas 2 Palm Oil Mill, has identified and recorded a recurring issue of “Kebersihan Kawasan Kediaman: ada tin kosong, takungan air, dan tempat nyamuk membiak” from April 2018 until 6 April 2019. No record of action taken is available.</p>	<p>It was verified during this audit that the based on the following housing inspection reports, there were no recurring issues: a. Saremas 2 Estate dated 6 March 2020, 13 March 2020, 7 Feb 2020, 16 Feb 2020, 20 Feb 2020, 28 Feb 2020, 4 Jan 2020; b. And Saremas 2 Palm Oil Mill dated 14 March 2020, 7 March 2020, 29 Feb, 22 Feb, 15 Feb, 8 Feb, 1 Feb 2020.</p> <p>Status: Closed</p>
<p>MYNI 2014 5.1.2</p> <p>MYNI 2019 3.4.3</p> <p>RAR 01 2019</p>	<p>Minor</p>	<p>Finding: Implementation from action plan (Mitigation Method for Significant EAI) was not comprehensive.</p> <p>Objective evidence: During site visit at Kaminsky Estate, Kongsu Lama, Genset room, oil trap was not maintained properly and sighted oil spillage to monsoon drain.</p>	<p>However, during site visit at Kaminsky Estate, Kongsu Lama, Genset room, oil trap was maintaining properly and no oil spillage has been sighted. However, this previous Minor NCR RAR 01 2019 was not fully rectified and clarified. Control measures for maintenance of vehicle and equipment activities was not fully implemented. During site visit at Contractor (Lata Sehijau Transport CO.) Workshop Saremas 2 Estate, sighted oil spillage near to watercourse.</p> <p>Status: Open, Major NCR has been raised again under indicator 3.4.3.</p>
<p>MYNI 2014 6.1.3</p> <p>MYNI 2019 3.4.2</p> <p>RZ 01 2019</p>	<p>Major</p>	<p>Finding: Impacts of replanting at Saremas 2 Estate, Segarmas Estate and Kaminsky Estate, if any, have not been identified nor developed in consultation with workers who could be potentially affected by replanting activities undertaken at these estates.</p> <p>Objective evidence: No evidence is available in the Social Impact Assessment Action Plans for Saremas 2 Estate, Segarmas Estate and Kaminsky Estate that field workers have been consulted on any potential impacts they may incur arising from the ongoing replanting activities at these estates.</p>	<p>It was verified during this audit that consultations have been carried out with workers affected by replanting activities. The consultation sessions were held with harvesters, sprayers, manurers, drivers and general workers. Workers were informed of the impending and ongoing replanting activities and issues of wages, heat stress and appropriate PPE were discussed. The sessions were held at Kaminsky Estate (6 May 2019 and 13 Sept 2019), Segarmas Estate (9 May 2019), and Saremas 2 Estate (13 May 2019).</p> <p>Status: Closed</p>

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<p>MYNI 2014 6.2.3</p> <p>MYNI 2019 1.1.5</p> <p>RZ 03 2019</p>	<p>Minor</p>	<p>Finding: Despite employing Indonesian workforce, Saremas 2 Palm Oil Mill, Saremas 2 Estate, Segarmas Estate and Kaminsky Estate have not identified the Consulate General of the Republic of Indonesia, Kuching, Sarawak as a stakeholder.</p> <p>Objective evidence: The stakeholder lists of Saremas 2 Palm Oil Mill, Saremas 2 Estate, Segarmas Estate and Kaminsky Estate have not identified and listed the Consulate General of the Republic of Indonesia, Kuching, Sarawak as a stakeholder.</p>	<p>It has since been verified during this re-certification audit that the Consulate General, Republic of Indonesia, Kuching, (nominated representative: Fazilah Munir, Tel:082-460734/461734) has been included in the stakeholder lists of all units under Saremas 2 CU.</p> <p>Status: Closed</p>
<p>MYNI 2014 6.5.3</p> <p>MYNI 2019 6.2.4</p> <p>RZ 02 2019</p>	<p>Minor</p>	<p>Finding: Saremas 2 Palm Oil Mill, Saremas 2 Estate, Segarmas Estate and Kaminsky Estate have not complied with the requirements of the Workers' Minimum Standard of Housing and Amenities Act 1990 ("the WMSHA Act").</p> <p>Objective evidence:</p> <p>1. At Saremas 2 Palm Oil Mill:</p> <p>a. The area surrounding the workers' housing was not kept clear of undergrowth and maintained in a clean and sanitary condition. This is a non-compliance of Section 23 (1) (a) of the WMSHA Act.</p> <p>b. The perimeter drains in particular behind Block H9, and the one drain separating the workers' housing from the staffs' housing including all outlet drains were covered in undergrowth causing water to stagnate. This is a non-compliance of Section 23 (1) (b) of the WMSHA Act.</p> <p>c. Overflowing of rubbish bins in front of units E7/99, E10/99, E11/99, E14/99. This is a non-compliance of Section 23 (1) (c) of the WMSHA Act.</p> <p>2. At Saremas 2 Estate: The drain in particular behind Block H4, were covered in undergrowth causing water to stagnate. This is a non-compliance of Section 23 (1) (b) of the WMSHA Act.</p> <p>3. At Segarmas Estate: Housing inspections were carried out as follows:</p> <p>a. At Division A: 7 Jan 2019, 28 Jan 2019, 4 Feb 2019, 18 Feb 2019, 8 March 2019, 3 April 2019.</p> <p>b. At Division B: 15 March 2019, 8 April 2019.</p> <p>c. At Division C: 29 March 2019. .</p> <p>4. At Kaminsky Estate: Housing inspections were carried out as follows:</p>	<p>It was verified during this audit that Saremas 2 Palm Oil Mill, Saremas 2 Estate, Segarmas Estate and Kaminsky Estate have satisfactorily complied with the requirements of the Minimum Workers' Standard of Housing and Amenities 1990 (Amended 2019) which came into effect in September 2019. It was observed and verified during this audit that the non-compliances raised in the previous audit related to the following have been rectified:</p> <p>a. No undergrowth was present at any of workers' housing area and houses generally maintained in a clean and sanitary condition;</p> <p>b. Perimeter drains are clear of undergrowth and no water stagnation was observed;</p> <p>c. No overflowing of rubbish bins was observed;</p> <p>d. Housing inspections at Segarmas Plantation and Kaminsky Estate were carried out on a weekly basis as follows:</p> <ul style="list-style-type: none"> - Segarmas Phase 2B and C: 10 Jan 2020, 17 Jan 2020, 24 Jan 2020, 31 Jan 2020 - Segarmas Division D: 6 Mac 2020, 13 Mac 2020, 8 Feb 2020, 13 Feb 2020, 25 Feb 2020 - Segarmas Division A: 10 Jan 2020, 17 Jan 2020, 24 Jan 2020, and 31 Jan 2020. - Kaminsky Estate: 13 March 2020, 7 March 2020, 28 Feb 2020, 21 Feb 2020, 14 Feb 2020, 8 Feb 2020, 31 Jan 2020 and 24 Jan 2020. - It was also noted that the new amendment to the Act requires housing inspections to be carried out once a fortnight. <p>e. VMO visits are regularly maintained at once every fortnight as follows:</p> <ul style="list-style-type: none"> - Segarmas Plantation: 12 March 2020, 28 Feb 2020, 13 Feb, 31 Jan, 16 Jan, 20 Dec - Kaminsky Estate: 12 March 2020, 28 Feb 2020, 13 Feb 2020, 31 Jan 2020, 16 Jan 2020, 20 Dec 2020, 12 Dec 2019, 23 Nov 2019

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		<p>a. At Kongsu Baru H Type: 18 Jan 2019, 22 Feb 2019, 20 March 2019.</p> <p>b. At Kongsu Lama H Type Block 14, 15, 16, 17: 25 Jan 2019, 26 Feb 2019, 29 March 2019.</p> <p>c. At Kongsu 58: 16 Jan 2019, 7 Feb 2019, 13 March 2019.</p> <p>d. At staff housing E Type: 11 Jan 2019, 13 Feb 2019, 30 March 2019, 8 April 2019.</p> <p>e. At housing D Type: 11 Jan 2019, 13 Feb 2019, 30 March 2019, 8 April 2019.</p> <p>This is a non-compliance of Section 23 (2) of the WMSHA Act which requires housing inspections to be carried out weekly.</p> <p>5. Records of visits by the visiting medical officer to Segarmas Estate were as follows: 20 September 2018, 12 October 2018, 13 November 2018, 15 January 2019 and 20 February 2019. This is a non-compliance of Section 19 (3) of the WMSHA Act which requires a registered medical practitioner to visit the clinic at least once a fortnight to supervise the operations and management of the clinic and to provide medical treatment to workers and their dependents.</p>	<p>Status: Closed</p>
<p>MYNI 2014 4.5.4</p> <p>(RSPO Certification System P&C June 2017)</p> <p>RAR 02 2019</p>	<p>Minor</p>	<p>Finding: Supporting documentation for self - declaration was in adequate</p> <p>Objective evidence: 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>	<p>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 of the following i.e.</p> <ul style="list-style-type: none"> d) Indonesia Units e) Arica Units f) Malaysia Units <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> <p>Status: Closed</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

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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	PT Kerry Sawit Indonesia 1,2 mill		Central Kalimantan	2020	Re-Audit, intial certification to proceed after HGU process

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	Tabiku Makmur, KUD Kosudra					
12	KUD Makmur Sejahtera	PT Rimba Harapan Sakti mill		Central Kalimantan	2023	HGU issue
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	West Sumatra	2011	Certified; KUD was certified in 2015

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			Anak Negeri Pasaman, Koperasi Tompek Tapian Kandis, Koperasi AWM, Koperasi BST, Koperasi MSJ			
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