



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

**File Ref. : EP09760004**

**RSPO PUBLIC SUMMARY REPORT**

**CLIENT** : Wilmar International Limited – Sri Kamusan Certification Unit

**PARENT COMPANY** : Wilmar International Limited

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

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

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

**MAP** : See Attachment 1

**AUDIT DATE** : 3 - 7 May 2021

**DURATION** : 20 auditor days

**TYPE OF AUDIT** :  Annual Surveillance Audit No.  Recertification Audit

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

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

**VALIDITY OF RSPO CERTIFICATE** : 13 May 2016 - 12 May 2021  
 (extended to 12/10/2021; provided under the provision in addressing the Covid-19 pandemic condition)

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

Non-conformity Report(s)

List of additional site(s)

**Report by Audit Team Leader**

Name : Khairul Najwan b. Ahmad Jahari

Signature :

Date : 24 August 2021

**Acknowledgement by Client's Representative**

Name : Foo Siew Theng

Signature :

Date : 25 August 2021

## RSPO PUBLIC SUMMARY REPORT

### SUMMARY OF AUDITS

Annual Surveillance Audit 1			
On-site audit date :	20-24 March 2017	No. of auditor days :	15 Auditor Days
Audit team :	Mohd Zulfakar Kamaruzaman (LA), Mohd Razman Salim, Rozaimiee Ab Rahman		
No. of major NCR(s) :	-	Indicator:	Closing date : -
No. of minor NCR(s) :	2	Indicator : 4.1.2 and 6.10.1	
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees	Settlers	Villagers
	X		X
	Contract workers	NGOs	Govt. agency
			X
	Indigenous people	Contractor	Others (Please specify)
	X	X	
Supply base sampled :	Jebawang Estate and Sapi Sugut Estate		
Changes since the last audit :	Upgraded capacity of mill from 40mt/hr to 60 mt/hr.		

Annual Surveillance Audit 2			
On-site audit date :	12-16 March 2018	No. of auditor days :	15
Audit team :	Mohd Zulfakar Kamaruzaman (LA), Rozaimiee Ab Rahman, Selvasingam T. Kandiah		
No. of major NCR :	2	Indicator: 4.7.2, 4.7.3	Closing date :5/6/2018
No. of minor NCR :	1	Indicator: 4.7.7	
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees	Settlers	Villagers
	√		√
	Contract workers	NGOs	Govt. agency
			√
	Indigenous people	Contractor	Others (Please specify)
	NA	√	
Supply base sampled :	Sri Kamusan Estate and Hibumas 1 Estate		
Justification of audit planning :	Total allocation of auditor days for Sri Kamusan CU were: Mill = 4 days (3 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems) Sri Kamusan Estate = 5 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification. Hibumas 1 Estate = 6 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification plus the estate location is very far inside and almost 2 years the auditor did not enter due to sampling, take extra mandays to verify everything.		
Changes since the last audit :	Mr Idrus waris promoted from Senior Assistant Manager to Manager and Transfer from Hibumas 1 to Sri Kamusan Estate. Mr Fadlee Yunsir Transfer from Sri Kamusan Estate to Hibumas 1 Estate.		
Report approved by :	Radziah Mohd Daud	Approval date :	11/06/2018

Annual Surveillance Audit 3			
On-site audit date :	11-15 March 2019	No. of auditor days :	18
Audit team :	Mohd Ab Raouf bin Asis (LA), Mohd Zulfakar bin Kamaruzaman (A), Dzulfiqar bin Azmi (A), Mohd Norddin bin Abdul Jalil (A)		
No. of major NCR :	3	Indicator: 2.1.1, 4.5.3 (c), 4.5.4 (e & f)	Closing date : 14/06/2019
No. of minor NCR :	2	Indicator: 1.3.1, 5.3.3	
	Employees	Settlers	Villagers
			Suppliers

## RSPO PUBLIC SUMMARY REPORT

Indicate by ticking the stakeholders interviewed during the on-site audit	/		/	
	Contract workers	NGOs	Govt. agency	Independent growers
	Indigenous people	Contractors	Others (Please specify)	
	NA			
Supply base sampled :	Hibumas 2, Jebawang, Sekar Imej and Sapi Sugut			
Justification of audit planning	<p>Total allocation of auditor days for Sri Kamusan CU were:                      Mill = 4 days (3 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems)                      Hibumas 2 Estate = 3.5 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification.                      Jebawang Estate = 3.5 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification plus the estate location is very far inside and almost 2 years the auditor did not enter due to sampling, take extra mandays to verify everything.                      Sekar Imej = 3.5 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification.                      Sapi Sugut = 3.5 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification.</p>			
Changes since the last audit :	In January 2019 adjustment from 7,438.24 Ha to 7,523.03 Ha (+84.78 ha) following the latest Re-survey and GIS analysis exercise. Survey conducted using UAV Areal Survey analysis completed in December 2018.			
Report approved by :	Radziah Mohd Daud	Approval date : 24/06/2019		

Annual Surveillance Audit 4				
On-site audit date :	9-13 March 2020	No. of auditor days :	20	
Audit team :	Mohd Ab Raouf bin Asis (LA), Mohd Zulfakar bin Kamaruzaman (A), Dzulfiqar bin Azmi (A), Rahayu binti Zulkifli (A).			
No. of major NCR :	15	Indicator: 2.1.1, 3.4.3, 3.6.1, 6.7.3, 7.8.2, 7.10.3, 3.2.1, 6.2.1, 6.2.3, 6.2.4, 4.1.1, 7.12.4, SC (5.3.1, 5.3.2, 5.5.2)	Closing date: *26/06/2020	
No. of minor NCR :	7	Indicator : 1.1.5, 2.1.3, 2.2.2, 3.7.2, 6.7.2, 7.3.1, 7.12.7		
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees	Settlers	Villagers	Suppliers
	✓	N/A	✓	✓
	Contract workers	NGOs	Govt. agency	Independent growers
	✓			N/A
Indigenous people	Contractors	Others (Please specify)		
	N/A	✓		
Supply base sampled :	Sri Kamusan Estate, Sekar Imej Estate, Hibumas 1 Estate, Hibumas 2 Estate			
Justification of audit planning	<p>Total allocation of auditor days for Sri Kamusan CU were:                      Mill = 4.0 days (3 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems)                      Sri Kamusan Estate = 4.0 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification.                      Sekar Imej Estate = 4.0 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification.                      Hibumas 1 Estate = 4.0 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification.                      Hibumas 2 = 4.0 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification.</p>			
Changes since the last audit :	Refer to remarks column below.			
Report approved by :	Kamini Sooriamoorthy	Approval date : 2/07/2020		

\*Special extension given by RSPO EB. Refer to email from RSPO to Wilmar dated 12/06/2020.

## RSPO PUBLIC SUMMARY REPORT

Recertification audit					
On-site audit date	:	3 - 7 May 2021	No. of auditor days.	20 Auditor days	
Audit team	:	Khairul Najwan (LA), Rozaimée, Selvasingam, Dzulfiqar			
No. of major NCR(s)	:	10	Indicator: 2.2.2, 2.1.3, 7.12.4, 7.2.2, 2.1.1, 3.2.1, 3.7.2, 6.7.3, 7.3.1, 7.10.3	Closing date: 19/7/2021 with condition	
No. of minor NCR(s)	:	5	Indicator: 3.7.3, 6.3.2, 3.4.2, 3.3.2, 7.3.3		
Indicate the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers	Suppliers
		✓		✓	✓
		Contract workers	NGOs	Govt. agency	FFB Suppliers
		✓	✓	✓	✓
		Indigenous people	Contractor	Others (Please specify)	
		✓	✓		
Supply base sampled	:	Sri Kamusan, Hibumas 1, Jebawang and Sapi Sugut			
Justification of audit planning	:	Total allocation of auditor days for Sri Kamusan CU were: Mill = 4.0 days (3 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems) Sri Kamusan Estate = 4.0 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification. Jebawang Estate = 4.0 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification. Hibumas 1 Estate = 4.0 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification. Sapi Sugut = 4.0 days each for verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification.			
Name of peer reviewer	:	Prof. Emeritus Dr. Jalani Sukaimi			
Report approved by	:	Kamini Sooriamorthy	Approval date:	24/08/2021	

## RSPO PUBLIC SUMMARY REPORT

### SUMMARY OF INFORMATION

**TABLE 1**

	RA	ASA 1	ASA 2	ASA 3	ASA 4
<b>Projection Period</b>	May 2021 – Apr 2022	March 2017- Feb 2018	March 2018- Feb 2019	March 2019- Feb 2020	***March 2020- Apr 2021
<b>Certified FFB Processed (MT)</b>	152,362.00	302,322.33	149,669.33	154,549.33	161,010.33
<b>Production of Certified CPO (MT)</b>	33,053.34	32,449.63	32,178.91	33,228.11	34,617.22
<b>Production of Certified PK (MT)</b>	6,856.29	5,368.77	6,735.12	6,954.72	7,245.47
<b>Certified Areas (Ha)</b>	14,258.10	14,258.10	14,258.10	14,258.10	14,258.10
<b>Planted Area (Ha) (Mature + Immature)</b>	*7,523.03	7,438.25	7,438.25	7,523.03	7,523.03
<b>Production Area (Ha) (Planted – Immature)</b>	*7,523.03	7,438.25	7,438.25	7,523.03	7,523.03
<b>HCV Areas</b>	**5,135.86	4,488.86	4,488.86	4,488.86	5,135.86
<b>REMARKS</b>	<p>*ASA03: In January 2019, the planted area has been revised from 7,438.24 Ha to 7,523.03 Ha (+84.78 ha) following the latest Re-survey and GIS (Geographic Information System) analysis exercise. Survey was conducted using UAV (Unmanned Aerial Vehicle) survey analysis and it was completed in December 2018.</p> <p>**ASA04: The overall changes of the declared area were mainly due to resurvey exercise using aerial UAV that allow precise and accurate land use analysis. Larger HCV area identified at Sekar Imej Estate and Hibumas 1 Estate.</p> <p>***The original projection was between March 2020 and Feb 2021 only, however, due to the extension period during the MCO, actual period covered during this reporting period is from March 2020 to April 2021.</p>				

**TABLE 2**

	CPO	PK
<b>Last years certified volume (MT)</b>	34,617.22	7,245.47
<b>Last years actual certified sold (MT)</b>	24,815.48	4,928.98
<b>Last years actual sold under other schemes (MT)</b>	0	0
<b>Last years sold conventional (MT)</b>	0	0
<b>Last year actual sold CSPO credits (where applicable)</b>	0	0
<b>New year certified volume (MT)</b>	33,053.34	6,856.29

<b>Table of contents</b>	<b>Page</b>
1.0 AUDIT PROCESS	7
1.1 Certification body	7
1.2 Qualification of audit team	7
1.3 Audit methodology	8
1.4 Stakeholder consultation	8
1.5 Audit plan	10
1.6 Date of next audit	10
2.0 SCOPE OF CERTIFICATION AUDIT	10
2.1 Description of the certification unit	10
2.2 Description of the Supply Base (including planting profile)	11
2.3 Organization Information / Contact Person(s)	14
3.0 AUDIT FINDINGS	15
3.1 Changes to certified products in accordance to the production of the previous year	15
3.2 Progress and changes in time bound plan	15
3.3. Other changes (e.g. organizational structure, new contact person, addresses, etc.)	15
3.4 Status of previous non-conformities * (refer to Attachment 5)	15
3.5 Complaint received from stakeholder (if any)	15
4.0 DETAILS OF NON-CONFORMITY REPORT	16
4.1 For P&C (refer to Attachment 3)	16
5.0 AUDIT CONCLUSION	16
6.0 RECOMMENDATION	16
List of Attachment	
Attachment 1 : Map of CU	17
Attachment 2 : RSPO Audit Plan	18
Attachment 3 : RSPO P&C Audit Checklist And Findings	24
Attachment 4 : Details of Non-conformities and Corrective Actions Taken	81
Attachment 5 : Status of Non-conformities Previously Identified	106
Attachment 6 : Time-bound Plan	117

## RSPO PUBLIC SUMMARY REPORT

### 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
Khairul Najwan Ahmad Jahari	Lead Auditor - Social, HCV	Possessed B.Sc. of Forestry from Universiti Putra Malaysia with total more than 20 years of working experience in the Forest Management, forest inventories, forest harvesting, remote sensing & GIS. He had 10 years of auditing experience in the oil palm operation including auditing in HCVF and social issues. He is a qualified Lead Auditor for RSPO P&C, MSPO, and Forest Management (FMC).
Rozaimiee Ab. Rahman	Auditor – Supply Chain, Social (workers right)	Holds a B. Sc. of Agriculture from UPM. He had 7 years of working experience in the oil palm operation. He is a qualified Lead Auditor for RSPO P&C and MSPO
Dzulfiqar bin Azmi	Auditor – Safety and Environment, TBP	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 RSPO Lead Auditor since Oct. 2020.
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.

## RSPO PUBLIC SUMMARY REPORT

### 1.3 Audit methodology

The audit covered the one palm oil mill and four of its supply bases. Instead of 100% supply base coverage, the sampling methodology applies for supply base with higher than four estates. The sampling shall be conducted in conformance with the requirement specified in the RSPO Certification Systems Document, Nov 2020. The audit covered the Sri Kamusan palm oil mill and four (4) of its supply bases. The supply base covered during the audit are Sri Kamusan Estate, Sekar Imej Estate, Hibumas 1 Estate and Hibumas 2 Estate. The audit included an on-site audit to the estates, mill, linesite, local communities, contractors and suppliers to verify the implementation of the requirement of the RSPO certification system. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

### 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 26<sup>th</sup> March 2021. In addition, SIRIM QAS International had also sent invitations through letters to the relevant stakeholders, including government agencies and Non-Governmental Organisations (NGOs).

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

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (including migrant workers)	<ul style="list-style-type: none"> <li>a. Workers working 6 days a week with one rest day (Sunday). They work 8 hours with a minimum of 30 minutes' break in between.</li> <li>b. All workers confirmed that they receive a minimum of RM1100 per month. They receive their salaries before 7<sup>th</sup> of every month.</li> <li>c. They receive their wages in cash. Since it is difficult to go to the nearest town due to the distance, their salaries are being brought in by the gang leaders.</li> <li>d. Any overtime work is mutually agreed between workers and management, and that there is no element of forcing.</li> <li>e. Documented foreign workers are not subjected to any recruitment fee. Foreign workers who choose to keep their passports at the office have done so with their written consent.</li> <li>f. Workers are generally satisfied with the way complaints lodged are acted upon. Delays in house repairs, if any, are usually due to the need to order repair parts.</li> <li>g. For newly-arrived foreign workers who do not understand Bahasa or English, translations are provided during briefings.</li> <li>h. Contractor's workers housing are dilapidated and not fit for habitation. A Major NCR was raised in relation to this.</li> </ul>
2) Settlers	Not applicable



## RSPO PUBLIC SUMMARY REPORT

Stakeholders interviewed	Evidence from stakeholder consultation
3) Villagers / Local communities (including women representatives, displaced communities)	The policy to respect human rights and prohibiting retaliation against HRD has not been communicated. Other than that, the relationship was good especially those between Sri Kamusan Estate and the neighbouring villages. One village even uses fresh water supply taken from Sri Kamusan Estate. Sri Kamusan Estate also engages the nearby local community to work part time as EFB applicator. They find this helpful as it increases their income.
4) Suppliers	All written agreement (FFB Suppliers) known as "Akur Janji dan Persetujuan Bersama" was sampled at Sri Kamusan CU contained a clause on no child [para i], forced and trafficked labour [para ii].
5) Contract workers	Some contract workers were not covered under KWSP, SOCSO or insurance. Thus, a Major NCR was raised.
6) Local & national NGOs	HUTAN/PONGO, Sabah Wildlife Department and Sabah Forestry Department (Forest Research Department)
7) Government agencies / Statutory bodies	<ul style="list-style-type: none"> <li>▪ Klinik Kesihatan Lingkabau on immunisation programme for workers' children</li> <li>▪ There was complaint letter received from Indonesia Embassy alleging minimum wages has not been implemented at the Wilmar CU. -during this audit auditor has verified the effectiveness of implementation related to minimum wages, as CU already used Top up systems and minimum wages was in fact implemented.</li> </ul>
8) Independent growers / Smallholders	No complaints. Fair & timely payments for FFB supplied. Having written agreement
9) Indigenous people	There were no issues on customary or user rights at Sapi Sugut, Sekar Imej and Jebawang Estate during this audit and verified by auditor during interview with the neighboring villages representative.
10) Contractor	Interviews were conducted with the transport suppliers for Sri Kamusan Palm Oil Mill.
11) Previous land owner (if any)	The implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. As explained in indicator 4.4.2, it has been verified that the land is now legitimately owned by Wilmar Sri Kamusan CU since 1988. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no new issues regarding land with villagers, local community and neighbouring estate.
12) Others (please specify)	Sighted Sekar Imej Estate school dormitory is in good condition, all the floor has been provided with carpet, new pillow and mattress, and the room was clean.

1.5 Audit plan : Refer to Attachment 2

## RSPO PUBLIC SUMMARY REPORT

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

### 2.0 SCOPE OF CERTIFICATION AUDIT

#### 2.1 Description of the certification unit

The Sri Kamusan Palm Oil Mill (Sri Kamusan POM) Certification Unit (CU) is a wholly owned subsidiary company of PPB Oil Palms Berhad (PPB). The CU consisted of the Sri Kamusan POM and six of its estates, namely the Sri Kamusan Estate, Hibumas 1 Estate, Hibumas 2 Estate, Jebawang Estate, Sekar Imej Estate and Sapi Sugut Estate. The audit did cover the independent smallholders that had been supplying fresh fruit bunches (FFBs) to the mill.

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

During this reporting period, Sri Kamusan CU was suspended between 7 May 2021 and 19 July 2021, due to recurring of Major NCRs.

With reference to the RACP process involving Sekar Imej and Hibumas 2 of Sri Kamusan CU, based on the correspondence between RSPO and Wilmar dated 27 July 2021, it can be confirmed that RSPO has accepted the compensation plan, hence there will be no impediment for this CU to be recommended for recertification.

## RSPO PUBLIC SUMMARY REPORT

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

Details of the FFB actual and projected contribution from each source to the mill are shown in the following tables.

Table 1: Actual FFB production by the supply base for the last reporting period from  
March 2020 to April 2021

Estates	FFB Production		Certifying CB
	Tonnes	Percentage (%)	
Sri Kamusan Estate	35,152.45	9.32%	SIRIM
Hibumas 1 Estate	34,815.63	9.23%	SIRIM
Hibumas 2 Estate	34,869.26	9.25%	SIRIM
Jebawang Estate	6,164.31	1.63%	SIRIM
Sekar Imej Estate	5,675.99	1.50%	SIRIM
Sapi Sugut Estate	3,138.49	0.83%	SIRIM
<b>Total (certified)</b>	119,816.12	31.77%	
<b>Outsiders (non certified)</b>	257,328.08	68.23%	-
<b>Total</b>	<b>377,144.20</b>	100.00%	-

## RSPO PUBLIC SUMMARY REPORT

Table 2: Projected FFB production by supply base for the next reporting period May 2021 to April 2022

Estates	FFB Contribution	
	Tonnes	Percentage (%)
Sri Kamusan Estate	33,829.67	8.43
Hibumas 1 Estate	36,548.67	9.11
Hibumas 2 Estate	53,842.00	13.42
Jebawang Estate	10,782.00	2.69
Sekar Imej Estate	11,126.67	2.77
Sapi Sugut Estate	6,233.00	1.55
Total (certified)	152,362.00	37.97
Outsiders (non-certified)	248,943.33	62.03
<b>Grand Total</b>	<b>401,305.33</b>	<b>100.00</b>

Table 3: Actual FFB received and CPO & PK dispatch by Sri Kamusan POM for period from March 2020 - April 2021

RSPO Supply Chain Model: Mass Balance	Total (MT)
FFB Received	377,144.20
FFB Processed	377,121.64
Certified FFB Processed	119,808.95
Non-certified FFB Processed	257,312.69
Crude Palm Oil (CPO)	
Overall CPO Production	78,739.56
Certified CPO Production	25,063.20
Certified CPO delivered as RSPO	24,815.48
Certified CPO delivered as non-RSPO	0
Certified CPO delivered under other sustainable schemes	0
Credits traded through Books and Claim	0
Palm Kernel (PK)	
Overall PK Production	15,990.81
Certified PK Production	5,089.53
Certified PK delivered as RSPO	4,928.98
Certified PK delivered as non-RSPO	0
Certified CPO delivered under other sustainable schemes	0
Credits traded through Books and Claim	0

Table 4: Projected FFB received and CPO & PK dispatch by Sri Kamusan POM of next reporting period May 2021 to April 2022

RSPO Supply Chain Model: Mass Balance	Total (MT)
FFB Received	401,305.33
FFB Processed	401,305.33
Certified FFB Processed	152,362.00
Certified CPO Production	33,053.34
Certified PK Production	6,856.29

## RSPO PUBLIC SUMMARY REPORT

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

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

Table 6: Planting profile for Sri Kamusan Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2000	1st	Mature	408.37	24.5%
2002	1st	Mature	405.40	24.3%
2003	1st	Mature	851.99	51.2%
<b>Total</b>			<b>1665.76</b>	<b>100.00</b>

Table 7: Planting profile for Hibumas 1 Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1999	1 <sup>ST</sup>	Mature	1040.35	58.6
2000	1 <sup>st</sup>	Mature	205.86	11.6
2001	1 <sup>st</sup>	Mature	224.30	12.6
2004	1 <sup>st</sup>	Mature	121.89	6.9
2006	1 <sup>st</sup>	Mature	119.24	6.7
2007	1 <sup>st</sup>	Mature	63.94	3.6
<b>Total</b>			<b>1775.58</b>	<b>100.00</b>

Table 8: Planting profile for Hibumas 2 Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2000	1 <sup>st</sup>	Mature	513.45	22
2005	1 <sup>st</sup>	Mature	792.47	34
2006	1 <sup>st</sup>	Mature	916.65	40
2007	1 <sup>st</sup>	Mature	80.85	4
<b>Total</b>			<b>2303.42</b>	<b>100.00</b>

Table 9: Planting profile for Jebawang Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2003	1 <sup>st</sup>	Mature	338.74	100.00
<b>Total</b>		<b>Mature</b>	<b>338.74</b>	<b>100.00</b>

Table 10: Planting profile for Sekar Imej Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2004	1 <sup>st</sup>	Mature	164.38	18%
2005	1 <sup>st</sup>	Mature	121.78	14%
2007	1 <sup>st</sup>	Mature	119.65	13%
2008	1 <sup>st</sup>	Mature	333.01	37%
2009	1 <sup>st</sup>	Mature	152.67	18%
<b>Total</b>			<b>891.49</b>	<b>100.00</b>

## RSPO PUBLIC SUMMARY REPORT

Table 11: Planting profile for Sapi Sugut Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2005	1 <sup>st</sup>	Mature	396.93	72%
2004	1 <sup>st</sup>	Mature	151.11	28%
<b>Total</b>			548.04	100.00

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

The details of the contact person is as shown below:

Name	:	Mr. Colman Ng Pin Wah
Position	:	Group Manager
Address	:	8th Floor UBN Tower, No. 10 Jalan P. Ramlee, Kuala Lumpur, Malaysia
Phone no.	:	+6089-671546
Email	:	<a href="mailto:colman.ngpinwah@my.wilmar-intl.com">colman.ngpinwah@my.wilmar-intl.com</a>

RSPO PUBLIC SUMMARY REPORT

3.0 AUDIT FINDINGS

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

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

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

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

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

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

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

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

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

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

If no, please state reasons

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

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

No significant changes

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

## RSPO PUBLIC SUMMARY REPORT

### 4.0 DETAILS OF NON-CONFORMITY REPORT

4.1 Details checklist refer to Attachment 3 :

Total no. of minor NCR(s)  
(details refer to Attachment 3) List :5 3.7.3, 6.3.2, 3.4.2, 3.3.2, 7.3.3

Total no. of major NCR(s)  
(details refer to Attachment 3) List :10 2.2.2 (upgraded), 2.1.3 (upgraded), 7.12.4 (recurrence), 7.2.2, 2.1.1 (recurrence), 3.2.1 (recurrence), 3.7.2 (recurrence), 6.7.3 (recurrence), 7.3.1 (upgraded), and 7.10.3 (recurrence),

### 5.0 AUDIT CONCLUSION

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

### 6.0 RECOMMENDATION

No NCR recorded. Recommended to continue certification.

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

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

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

Recommended to continue certification.

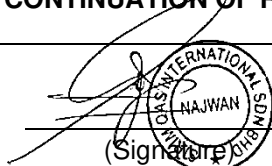
Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s)..... have not been satisfactorily closed out within 60 days of the audit. Recommended for suspension of the certificate.

*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 : Khairul Najwan b. Ahmad Jahari

(Name)

  
(Signature)

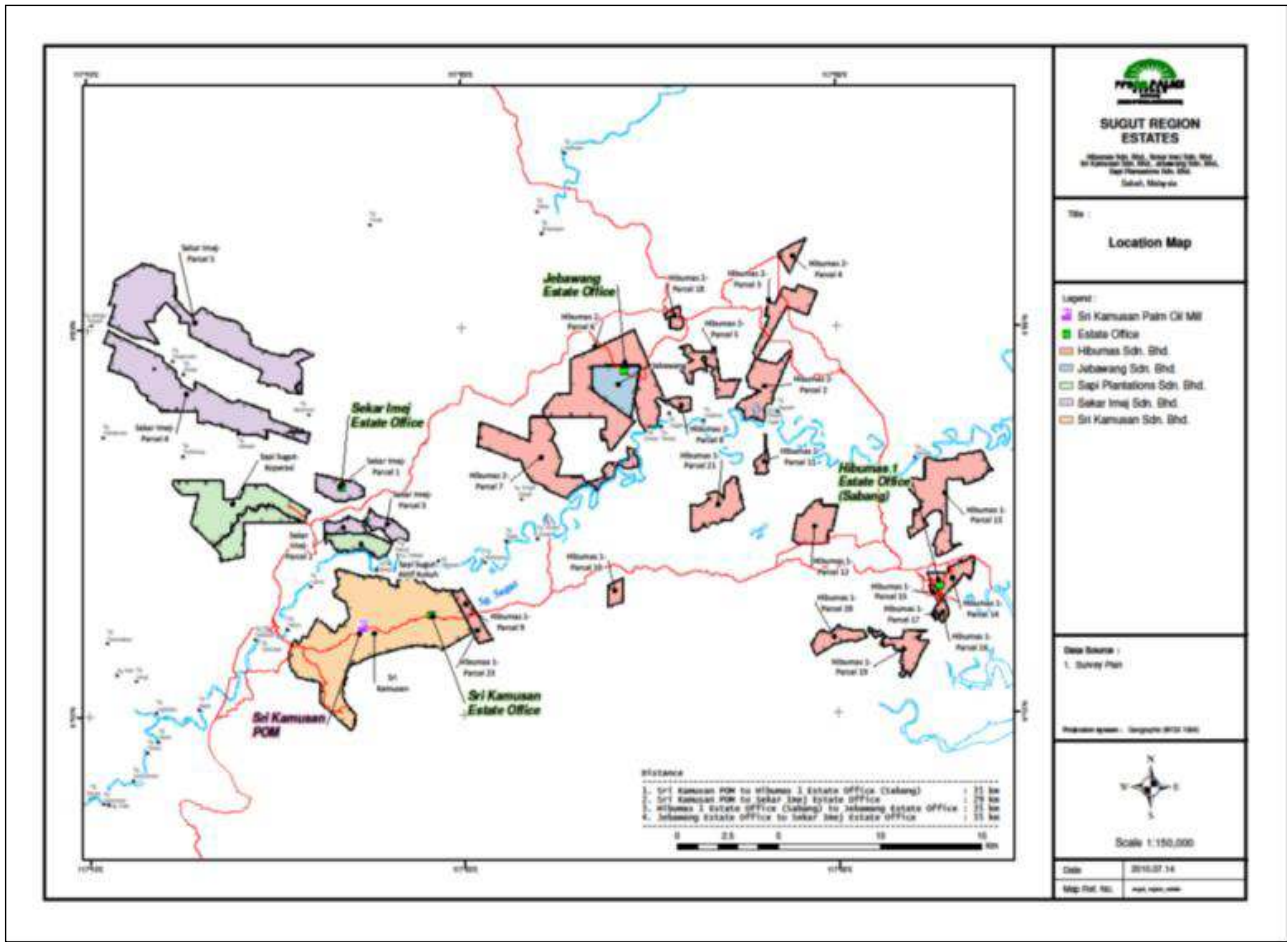
19/7/2021

(Date)



RSPO PUBLIC SUMMARY REPORT

Attachment 1 - Map



**RECERTIFICATION AUDIT PLAN**

**1. Objectives**

The objectives of the audit are as follows:

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

**2. Date of assessment** : 3-7 May 2021

**3. Site of assessment** : Sri Kamusan Certification Unit

- i. Sri Kamusan POM
- ii. Sri Kamusan Estate
- iii. Hibumas 1 Estate
- iv. Jebawang Estate
- v. Sapi Sugut Estate

**4. Scope of certification:** Production of Sustainable Crude Palm Oil and Palm Kernel Using the Mass Balance Supply Chain Model

**5. Reference Standard:**

- a. MYNI 2019 of RSPO P&C 2018
- b. RSPO Certification Systems, Nov 2020
- c. Company's audit criteria including Company's Manual/Procedures

**5. Assessment Team**

- (i) Audit Team Leader : Khairul Najwan bin Ahmad Jahari – Social, HCV
- (ii) Auditor : Rozaimie Abd Rahman - SCCS, Social, workers right  
Dzulfiqar Azmi - TBP, Environmental, Safety  
Selvasingam T Kandiah – GAP/Milling, Safety

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

**7. Audit Method**

Site audits or field checks including observation of practices, interviews with internal and external stakeholders and interested parties (employees, nearby population, etc.), documentation review and evaluation of records.

**8. Audit Findings**

Audit findings shall be classified as major and/or minor. Major non-conformities shall be addressed within 90 days or else the certificate shall be suspended. If the major non-conformities are still not addressed within another 90 days, the certificate shall be terminated.

If there are five or more major non-compliances within one Principle found during the audit, immediate suspension of RSPO certification shall be recommended.

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

**9. Confidentiality Requirements**

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

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

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

**11. Reporting**

- a) Language : English
- b) Format : Verbal and written
- c) Expected date of issue : 2 weeks after the closure of the Major NC / or if only minor NC, 30 days from the last day of this audit.

**12. Facilities Required**

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

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

**RSPO PUBLIC SUMMARY REPORT**

**Audit Day 1: 3 May 2021 (Monday)**

<b>Time</b>	<b>Activities / areas to be visited</b>				<b>Auditee</b>
8.30am	Opening Meeting – Audit team introduction and briefing on assessment objectives, scope, methodology, criteria and programmes by SIRIM QAS Audit Team Leader.				
8.45am	Organization Representative - Briefing on RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases, Time bound plan, actions taken to address previous audit findings and previous special audit findings. Logistics discussion to the sites to be visited.				Management Representative
9.00am	To assign each audit team members – site and the P&C requirements				
	<b>Selva (Sri Kamusan POM)</b>	<b>Rozaimiee (Sri Kamusan POM)</b>	<b>Dzulfiqar (Sri Kamusan POM)</b>	<b>Najwan (Sri Kamusan POM)</b>	
	Site visit and assessment on implementation: <ul style="list-style-type: none"> <li>• Laws and regulations</li> <li>• Commitment to long-term economic and financial viability</li> <li>• Occupational safety &amp; health practice</li> <li>• witness activities at site</li> <li>• Training and skill development programmes</li> </ul>	Site visit and assessment on Supply Chain Implementation including the <ul style="list-style-type: none"> <li>• Model used.</li> <li>• General Chain of Custody</li> <li>• System Requirements for the supply chain</li> <li>• Documented procedures</li> <li>• Purchasing and goods in</li> <li>• Outsourcing activity</li> <li>• Sales and goods out</li> <li>• Processing</li> <li>• Records keeping</li> <li>• Registration</li> <li>• Training</li> <li>• Claims</li> </ul>	Site visit and assessment on implementation: <ul style="list-style-type: none"> <li>• Laws and regulations</li> <li>• Environmental management –</li> <li>• witness activities at site</li> <li>• Waste &amp; chemical management</li> <li>• Interview with workers, safety committee and contractors</li> <li>• Facilities at workplace</li> <li>• Training and skill development programmes</li> <li>• Continuous improvement</li> <li>• Time bound plan and uncertified management units</li> </ul>	Site visit and assessment on implementation: <ul style="list-style-type: none"> <li>• Social aspects - SIA, management plan &amp; implementation, workers' quarters.</li> <li>• Land titles user rights</li> <li>• Stakeholder consultation with affected communities of surrounding the CU.</li> <li>• Interview with gender committee, worker representative, contractors, supplier, etc</li> <li>• Linesite inspection</li> <li>• Complaints and grievances</li> <li>• Consultation with relevant government agencies</li> <li>• Training and skill development programs</li> </ul>	
1.00pm	<b>LUNCH BREAK / ZUHUR PRAYER</b>				All
2.00pm	Continue assessment at Sri Kamusan POM	Continue assessment at Sri Kamusan POM	Continue assessment at Sri Kamusan POM	Continue assessment at Sri Kamusan POM	Guide(s) for each auditor
4.00 - 5.00pm	Audit team discussion / End of Day 1 audit				All

**Audit Day 2: 4 May 2021 (Tuesday)**

<b>Time</b>	<b>Activities / areas to be visited</b>	<b>Auditee</b>
	Overview of current activities at Supply base sites. To assign each audit team members – site and the P&C requirements <b>(Sri Kamusan Estate)</b>	Guide(s) for each auditor

## RSPO PUBLIC SUMMARY REPORT

	<b>Selvaa</b>	<b>Najwan</b>	<b>Dzulfiqar</b>	<b>Rozaimée</b>	Guide(s) for each auditor
8.30am	<ul style="list-style-type: none"> <li>Laws and regulations</li> <li>Commitment to long-term economic and financial viability</li> <li>Good Agricultural Practice- witness activities at site (weeding/ spraying, etc)</li> <li>EFB mulching, POME application</li> <li>Chemical store/fertilizer</li> <li>Plantation on hilly/swampy area</li> <li>IPM implementation, training and safe use of agro-chemicals.</li> <li>New planting</li> <li>Continuous improvement</li> </ul>	<ul style="list-style-type: none"> <li>Land titles user rights</li> <li>Stakeholder consultation with affected communities surrounding the CU.</li> <li>Interview with contractors, supplier, etc</li> <li>Inspection of protected sites with HCV attributes</li> <li>Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>HCV Assessment management plan &amp; implementation</li> <li>Training and skill development programs</li> </ul>	<ul style="list-style-type: none"> <li>Laws and regulations</li> <li>Environmental management – witness activities at site</li> <li>Waste &amp; chemical management</li> <li>Interview with workers, safety committee and contractors</li> <li>Facilities at workplace</li> <li>Occupational safety &amp; health practice                             <ul style="list-style-type: none"> <li>– witness activities at site</li> </ul> </li> <li>Training and skill development programmes</li> <li>Continuous improvement</li> </ul>	<ul style="list-style-type: none"> <li>Social aspects - SIA, management plan &amp; implementation, workers' quarters.</li> <li>Workers right</li> <li>Interview with gender committee, worker representative, etc</li> <li>Linesite inspection</li> <li>Complaints and grievances</li> <li>Consultation with relevant government agencies</li> </ul>	
1.00pm	<b>LUNCH BREAK / ZUHUR PRAYER</b>				All
2.00pm	Continue assessment				Guide(s) for each auditor
4.00 - 5.00pm	Audit team discussion / End of Day 2 audit				All

### Audit Day 3: 5 May 2021 (Wednesday)

<b>Time</b>	<b>Activities / areas to be visited</b>				<b>Auditee</b>
8.30am	Overview of current activities at Supply base sites. To assign each audit team members – site and the P&C requirements				Respective Scheme Manager
8.30am	To assign each audit team members – site and the P&C requirements <b>(Hibumas 1 Estate)</b>				Guide(s) for each auditor
	<b>Selva</b>	<b>Najwan</b>	<b>Dzulfiqar</b>	<b>Rozaimée</b>	Guide(s) for each auditor
	<ul style="list-style-type: none"> <li>Laws and regulations</li> <li>Commitment to long-term economic and financial viability</li> <li>Good Agricultural Practice- witness activities at site (weeding/ spraying, etc)</li> </ul>	<ul style="list-style-type: none"> <li>Land titles user rights</li> <li>Stakeholder consultation with affected communities surrounding the CU.</li> <li>Interview with contractors, supplier, etc</li> <li>Inspection of protected sites with HCV attributes</li> </ul>	<ul style="list-style-type: none"> <li>Laws and regulations</li> <li>Environmental management – witness activities at site</li> <li>Waste &amp; chemical management</li> <li>Interview with workers, safety committee and contractors</li> </ul>	<ul style="list-style-type: none"> <li>Social aspects - SIA, management plan &amp; implementation, workers' quarters.</li> <li>Workers right</li> <li>Interview with gender committee, worker representative, etc</li> <li>Linesite inspection</li> <li>Complaints and grievances</li> </ul>	

## RSPO PUBLIC SUMMARY REPORT

	<ul style="list-style-type: none"> <li>EFB mulching, POME application</li> <li>Chemical store/fertilizer</li> <li>Plantation on hilly/swampy area</li> <li>IPM implementation, training and safe use of agro-chemicals.</li> <li>New planting</li> <li>Continuous improvement</li> </ul>	<ul style="list-style-type: none"> <li>Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>HCV Assessment management plan &amp; implementation</li> <li>Training and skill development programs</li> </ul>	<ul style="list-style-type: none"> <li>Facilities at workplace</li> <li>Occupational safety &amp; health practice                             <ul style="list-style-type: none"> <li>witness activities at site</li> </ul> </li> <li>Training and skill development programmes</li> <li>Continuous improvement</li> </ul>	<ul style="list-style-type: none"> <li>Consultation with relevant government agencies</li> </ul>	
1.00pm	<b>LUNCH BREAK / ZUHUR PRAYER</b>				All
2.00pm	Continue assessment at Hibumas 1 Estate				Guide(s) for each auditor
4.00 - 5.00pm	Audit team discussion / End of Day 3 audit				All

### Audit Day 4: 6 May 2021 (Thursday)

Time	Activities / areas to be visited				Auditee
8.30am	Overview of current activities at Supply base sites. To assign each audit team members – site and the P&C requirements				
8.30am	To assign each audit team members – site and the P&C requirements (Jebawang Estate)				Guide(s) for each auditor
	<b>Selva</b>	<b>Najwan</b>	<b>Dzulfiqar</b>	<b>Rozaimiee</b>	Guide(s) for each auditor
	<ul style="list-style-type: none"> <li>Laws and regulations</li> <li>Commitment to long-term economic and financial viability</li> <li>Good Agricultural Practice-witness activities at site (weeding/ spraying, etc)</li> <li>EFB mulching, POME application</li> <li>Chemical store/fertilizer</li> <li>Plantation on hilly/swampy area</li> <li>IPM implementation, training and safe use of agro-chemicals.</li> <li>New planting</li> <li>Continuous improvement</li> </ul>	<ul style="list-style-type: none"> <li>Land titles user rights</li> <li>Stakeholder consultation with affected communities surrounding the CU.</li> <li>Interview with contractors, supplier, etc</li> <li>Inspection of protected sites with HCV attributes</li> <li>Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>HCV Assessment management plan &amp; implementation</li> <li>Training and skill development programs</li> </ul>	<ul style="list-style-type: none"> <li>Laws and regulations</li> <li>Environmental management – witness activities at site</li> <li>Waste &amp; chemical management</li> <li>Interview with workers, safety committee and contractors</li> <li>Facilities at workplace</li> <li>Occupational safety &amp; health practice                             <ul style="list-style-type: none"> <li>witness activities at site</li> </ul> </li> <li>Training and skill development programmes</li> <li>Continuous improvement</li> </ul>	<ul style="list-style-type: none"> <li>Social aspects - SIA, management plan &amp; implementation, workers' quarters.</li> <li>Workers right</li> <li>Interview with gender committee, worker representative, etc</li> <li>Linesite inspection</li> <li>Complaints and grievances</li> <li>Consultation with relevant government agencies</li> </ul>	
1.00pm	<b>LUNCH BREAK / ZUHUR PRAYER</b>				All

## RSPO PUBLIC SUMMARY REPORT

2.00pm	Continue assessment at Hibumas 2 Estate	Guide(s) for each auditor
4.00 - 5.00pm	Audit team discussion / End of Day 4 audit	All

### Audit Day 5: 7 May 2021 (Friday)

Time	Activities / areas to be visited	Auditee							
8.30am	Overview of current activities at Supply base sites. To assign each audit team members – site and the P&C requirements	Respective Scheme Manager							
8.30am	To assign each audit team members – site and the P&C requirements (Sapi Sugut Estate)	Guide(s) for each auditor							
	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">Selva</th> <th style="width: 25%;">Najwan</th> <th style="width: 25%;">Dzulfiqar</th> <th style="width: 25%;">Rozaimiee</th> </tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> <li>Laws and regulations</li> <li>Commitment to long-term economic and financial viability</li> <li>Good Agricultural Practice-witness activities at site (weeding/ spraying, etc)</li> <li>EFB mulching, POME application</li> <li>Chemical store/fertilizer Plantation on hilly/swampy area</li> <li>IPM implementation, training and safe use of agro-chemicals.</li> <li>New planting</li> <li>Continuous improvement</li> </ul> </td> <td> <ul style="list-style-type: none"> <li>Land titles user rights</li> <li>Stakeholder consultation with affected communities surrounding the CU.</li> <li>Interview with contractors, supplier, etc</li> <li>Inspection of protected sites with HCV attributes</li> <li>Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>HCV Assessment management plan &amp; implementation</li> <li>Training and skill development programs</li> </ul> </td> <td> <ul style="list-style-type: none"> <li>Laws and regulations</li> <li>Environmental management – witness activities at site</li> <li>Waste &amp; chemical management</li> <li>Interview with workers, safety committee and contractors</li> <li>Facilities at workplace</li> <li>Occupational safety &amp; health practice – witness activities at site</li> <li>Training and skill development programmes</li> <li>Continuous improvement</li> </ul> </td> <td> <ul style="list-style-type: none"> <li>Social aspects - SIA, management plan &amp; implementation, workers' quarters.</li> <li>Workers right</li> <li>Interview with gender committee, worker representative, etc</li> <li>Linesite inspection</li> <li>Complaints and grievances</li> <li>Consultation with relevant government agencies</li> </ul> </td> </tr> </tbody> </table>	Selva	Najwan	Dzulfiqar	Rozaimiee	<ul style="list-style-type: none"> <li>Laws and regulations</li> <li>Commitment to long-term economic and financial viability</li> <li>Good Agricultural Practice-witness activities at site (weeding/ spraying, etc)</li> <li>EFB mulching, POME application</li> <li>Chemical store/fertilizer Plantation on hilly/swampy area</li> <li>IPM implementation, training and safe use of agro-chemicals.</li> <li>New planting</li> <li>Continuous improvement</li> </ul>	<ul style="list-style-type: none"> <li>Land titles user rights</li> <li>Stakeholder consultation with affected communities surrounding the CU.</li> <li>Interview with contractors, supplier, etc</li> <li>Inspection of protected sites with HCV attributes</li> <li>Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>HCV Assessment management plan &amp; implementation</li> <li>Training and skill development programs</li> </ul>	<ul style="list-style-type: none"> <li>Laws and regulations</li> <li>Environmental management – witness activities at site</li> <li>Waste &amp; chemical management</li> <li>Interview with workers, safety committee and contractors</li> <li>Facilities at workplace</li> <li>Occupational safety &amp; health practice – witness activities at site</li> <li>Training and skill development programmes</li> <li>Continuous improvement</li> </ul>	<ul style="list-style-type: none"> <li>Social aspects - SIA, management plan &amp; implementation, workers' quarters.</li> <li>Workers right</li> <li>Interview with gender committee, worker representative, etc</li> <li>Linesite inspection</li> <li>Complaints and grievances</li> <li>Consultation with relevant government agencies</li> </ul>
Selva	Najwan	Dzulfiqar	Rozaimiee						
<ul style="list-style-type: none"> <li>Laws and regulations</li> <li>Commitment to long-term economic and financial viability</li> <li>Good Agricultural Practice-witness activities at site (weeding/ spraying, etc)</li> <li>EFB mulching, POME application</li> <li>Chemical store/fertilizer Plantation on hilly/swampy area</li> <li>IPM implementation, training and safe use of agro-chemicals.</li> <li>New planting</li> <li>Continuous improvement</li> </ul>	<ul style="list-style-type: none"> <li>Land titles user rights</li> <li>Stakeholder consultation with affected communities surrounding the CU.</li> <li>Interview with contractors, supplier, etc</li> <li>Inspection of protected sites with HCV attributes</li> <li>Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>HCV Assessment management plan &amp; implementation</li> <li>Training and skill development programs</li> </ul>	<ul style="list-style-type: none"> <li>Laws and regulations</li> <li>Environmental management – witness activities at site</li> <li>Waste &amp; chemical management</li> <li>Interview with workers, safety committee and contractors</li> <li>Facilities at workplace</li> <li>Occupational safety &amp; health practice – witness activities at site</li> <li>Training and skill development programmes</li> <li>Continuous improvement</li> </ul>	<ul style="list-style-type: none"> <li>Social aspects - SIA, management plan &amp; implementation, workers' quarters.</li> <li>Workers right</li> <li>Interview with gender committee, worker representative, etc</li> <li>Linesite inspection</li> <li>Complaints and grievances</li> <li>Consultation with relevant government agencies</li> </ul>						
12.30pm	<b>LUNCH BREAK / JUMAAT PRAYER</b>	All							
2.00pm	<ul style="list-style-type: none"> <li>Verification on outstanding issues for CU</li> <li>Auditor to inform auditee on the required document / records</li> <li>Continue Audit Team discussion and preparation of assessment findings.</li> </ul>	Guide(s) for each auditor							
4.00 pm	<ul style="list-style-type: none"> <li>Discussion and acceptance on assessment findings with Management Representative and visited site Plantation / Scheme Manager.</li> <li>Closing meeting at CU</li> </ul>	All							
5.00 pm	End of audit								

**RSPO PUBLIC SUMMARY REPORT**

**Attachment 3**

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

**Principle 1: Behave ethically and transparently**

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

<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
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	Sri Kamusan CU has a comprehensive system with respect to this Indicators. Request Forms were available for stakeholders or interested party to obtain information related to RSPO. Records of visit by the Government agencies, NGOs and local communities were established.
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	Yes	The estates and mill had identified personnel responsible for complaints. Records of communication were identified and maintained. Languages used in common are Bahasa Malaysia and English. On certain instances translator of employees' colleagues are applied for a better understanding of information and training purposes.
	1.1.3 (C) Records of requests for information and responses are maintained.		Sri Kamusan CU has kept all the records of requests for information and responses are maintained which included the government agencies, NGOs, local communities and others. It has been reviewed during the conduct of audit. 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. The CU has provided relevant information (environmental, social and/or legal) as requested by the relevant stakeholder during the annual stakeholder meeting.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	Yes	Consultation and communication procedures used by the CU in handling internal and external communications was documented and identified as 'RSPO 6.2- Consultation and Communication Procedure'. This procedure was used by the CU in handling internal and external communications. Implementation of the procedure was evidenced from minutes of meetings held with internal and external stakeholders. Explanations and communications were given to stakeholders by the management.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	Yes	Each unit within the Sri Kamusan CU has its own stakeholder lists duly updated. The stakeholder lists comprise a list of all stakeholders namely nearby local communities, contractors, suppliers, government agencies, embassies, high commissioners and



## RSPO PUBLIC SUMMARY REPORT

			consulates, NGOs, clinics, hospitals, sundry shop owners, etc. Details of each stakeholder include their names, designated persons, contact numbers, and address.
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	Policy for ethical conduct was available as stated in Code of Ethics and Code of Conduct and Code of Ethics. Based on documentation review, observations during audit and interviews conducted, the ethical conduct policy is implemented in its sampled business operations and transactions. Contractors, suppliers and employees interviewed are aware of conflict of interest and the offence of accepting bribery and have been briefed on the same during stakeholder meetings and company policy briefings.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	Yes	There are at least two systems in place that monitor compliance and implementation of ethical conduct: Signatories Conditions document and the establishment of a Tender Committee.

### **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	In general, Sri Kamusan CU complies with applicable legal requirements and regulations. However, during the audit, Hibumas 1 Estate and Jebawang Estate were found not complying with the regulation on Occupational Safety and Health (Notification of Accident, Dangerous Occurrence, Occupational Poisoning and Occupational Disease) Regulations 2004, Regulation 10 Records Subsection 3. Based on JKPP 8 form for all accidents and dangerous occurrences which have occurred in year 2020 was send after 31 January 2021. Consequently, recurrence Major DA 01/2021 was raised with difference issues but same indicator.
	2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	Yes	The "Register of Legal and Other Applicable Requirement" was made available at Sri Kamusan CU. The document reviewed by the Sustainability Unit. Changes to the law and regulation are monitored by the Sustainability Unit - Manager. Various sources were referred in obtaining information about the updates of legal requirements. This includes checking with the industrial association, attending seminar/conference, buying of the law books, government agencies websites, etc.
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained,	No	During this recertification audit, visit to legal boundaries between Sri Kamusan Estate (Block 5) with Kg. Tangkangit, found only one red painted pole and was not clearly demarcated and not maintained along the estate boundaries. Another visit to legal

**RSPO PUBLIC SUMMARY REPORT**

<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	and there is no planting beyond these legal or authorised boundaries.		boundaries between Hibumas 1 Estate with IJM Plantation, and Hibumas 1 Estate with IDC found the boundary paint were faded and not maintained, even the estate staff were unable to find the boundaries. Again, visit to Jebawang Estate adjacent with IJM Plantation was not found. Audit concludes that legal or authorised boundaries were not clearly demarcated and visibly maintained. Corrective action plan was not effectively implemented. Thus, Minor NCR MZK02/2020 was upgraded to Major NCR KN01/2021
2.2 All contractors providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.1 A list of contracted parties is maintained.	Yes	The list of contracted parties was available in each unit in its respective stakeholder list. The lists contain name of contractors, designated contact persons, address, telephone/fax/email and type of contracted works done.
	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	Each contract issued to suppliers and contractors contain a clause requiring compliance with legal requirements. Sighted during the audit were contracts between with crude palm oil and palm kernel transporters, the contracts contained a provision that the contractor shall comply with the provisions of the relevant Acts, regulations and by-laws. During this recertification audit, audit found two contractors of FFB transporter at Hibumas 1 Estate, were not able to demonstrate compliance with legal requirements by not paying their workers EPF, and SOCSO or insurance. Therefore, Minor RZ 03/2020 was raised upgraded to Major NCR RAR 01/2021
	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.	Yes	All written agreements known as “Akur Janji dan Persetujuan Bersama” was sampled at Sri Kamusan CU contains a clause on no child [para i], forced and trafficked labour [para ii].
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"> <li>• Information on geo-location of FFB origins.</li> <li>• Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>• One or more supporting documents for claims</li> <li>• Valid MPOB license</li> </ul>	Yes	Sri Kamusan POM have the map with geo-location of each FFB suppliers, ownership and MPOB licences for directly sourced of FFB.

**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings
	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	Currently in Sri Kamusan POM there is no practice of indirectly source of FFB. All FFB are received direct from the suppliers.

**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	Sri Kamusan CU have management plan to achieve long-term economic and financial viability which was reviewed annually and implemented. Both the Palm Oil Mill and Estates had management plans (budgets) for the current year and projections up to year 2029. The yearly budget and projections were reviewed annually and compared against expenditure for each year. The parameters monitored remained essentially unchanged and included Capital (CAPEX) and Operating costs.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	Yes	The replanting programme for the next five years had been prepared This programme reviewed once a year and is incorporated in their annual financial budget which reviewed in their office.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	Yes	Sri Kamusan CU conducting management reviews at planned intervals appropriate to the scale and nature of the activities undertaken. The management reviews were conducted in March for the mill and May 2021 for the estates.
3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow	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.	No	The social section of the continuous improvement plan was reviewed during the audit and was cross-checked against the Social Impact Assessment monitoring and action plan of each unit within Sri Kamusan CU. One of the issues identified in the SIA monitoring and action plan was workers' housing conditions and amenities. The continuous improvement plan has therefore included housing improvement for workers and staff, and for the construction of a takraw court at the Mill housing, respectively. During this recertification audit, it was found that the action plan for continuous improvement at Hibumas 1 and Sri Kamusan Estates were not satisfactorily implemented. Corrective action plan during last surveillance 4 audit (DA10/2020) was not effectively implemented. With that, Major (Recurrence) DA02/2021 was raised.

**RSPO PUBLIC SUMMARY REPORT**

<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
demonstrable continuous improvement in key operations.	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	NA	Not applicable
3.3 Operating procedures are appropriately documented, consistently implemented and monitored.	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	Yes	Operating procedures are appropriately documented, consistently implemented and monitored in Sri Kamusan CU. Standard Operating Procedures (SOPs) for the unit of certification are in place. It has been reviewed during the audit.
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	No	Sri Kamusan CU had in place mechanisms to check consistent implementation of procedures. The several mechanisms used to check on consistent implementation of procedures used by CU were internal audits conducted by the Sustainability team, visits by the Assistant General Manager, Monthly Visits by External Electrical Engineer, PA's visits by Inspectorate, visits by Agronomists and consultation with RSPO team & management. However, at time of visit, consistent implementation of procedures as per Wilmar International Limited Agriculture Manual & SOP for Oil Palm 3/2011 were not implemented as per: <ol style="list-style-type: none"> <li>1. Part 2: Upkeep Mature Oil Palm Chapter 6 – Item 2.2 Inter-row maintenance to eradicate the large numbers of VOPs and woody growths in Block 26 of Hibumas 1 Estate and in Block 5 of Jebawang Estate.</li> <li>2. Chapter 7 Item 9.2 to collect all loose fruits and harvested bunches in Block 26 of Hibumas</li> </ol> It was noted the consistent implementation of procedures was not in place. Thus, Minor NCR STK01/2021 was issued.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	Yes	Evidence was available to demonstrate that records of monitoring and the actions taken by Sri Kamusan Palm Oil Mill were maintained and kept for a minimum of 12 months.
3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a	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	There was no new planting in Sri Kamusan CU. Environmental Aspect and Impact (EAI) was conducted internally considering activities associated to estate and mill operations. Activities includes but not limited to replanting, weeding & spraying, harvesting & collection, Pest & Disease control and waste.
	3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have	No	An independent SIA was conducted in 2010 by the Malaysian Environmental Consultants Sdn Bhd, and a report entitled "Impact Assessment for Sugut Region Estates (PPB Oil Palms Berhad), Beluran, Sabah, Malaysia was produced. The report was prepared with the

**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings
social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.	been developed with participation of affected stakeholders.		<p>participation of the relevant stakeholders, such as Government Department and neighbouring villages communities; Beluran District Office, Beluran Forest Department, and Agriculture Department and involving all communities living within the vicinity of Sri Kamusan CU. However, it was found that Sri Kamusan CU has identified new affected stakeholders of surrounding local indigenous communities. This information was collected during stakeholders meeting, and registered smallholders for FFB suppliers, from time to time. Example of names of villages below, were not updated into the SIA.</p> <ul style="list-style-type: none"> <li>• Sri Kamusan Estate – Kg. Lingkabau, Kg. Tangkangit, Kg. Lintabong, and others</li> <li>• Hibumas 1 Estate – Kg Sungai Sungai, Kg. Sabang, and others</li> <li>• Jebawang Estate – Kg. Banang, Kg. Linayukan, and others</li> <li>• Sapi Sugut Estate – Kg. Kinadaan / Matanggal Sugut, Kg. Binsulong and others</li> </ul> <p>The current affected surrounding stakeholders was not included into the Social Impact Assessment (SIA). Therefore, Minor NCR KN02/2021 was raised.</p> <p>In the SIA reports, records of meetings with stakeholders including types of stakeholders, target groups and dates of consultations were documented. Among the issues raised by local communities, staffs and workers were road maintenance, deduction of OER, transportation for school children and work opportunities for local communities. The workers, on the other hand, raised concerns on the housing conditions, conditions of the crèche and etc. The social management and monitoring plans of all estates and mill within Sri Kamusan CU have been developed with participation of affected stakeholders after getting both positive and negative inputs, as reviewed during the conduct of audit.</p> <p>Sri Kamusan CU has established procedure for SOP for Environmental Aspect &amp; Impact and Mitigation Plan titled “Identification of Environmental Aspects and Evaluation of Environmental Impacts”, which covers form upstream activities such as FFB reception until downstream processes. The environmental management and monitoring plans were developed based on the impact identified in the EAI. 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 management has periodically reviewed the implementation and effectiveness of the established program. So far, no issues related to environmental has been highlighted during stakeholders meeting.</p>
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	Yes	Sri Kamusan CU has implemented, reviewed and updated. The social and environmental management and monitoring plan on annual basis. The review and updates are done participatorily after getting feedback from the stakeholder consultations.
3.5 A system for managing human	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented	Yes	Employment procedures which include recruitment, selection and hiring are contained in a document entitled Recruitment of Workers PPB/HR/RSPO 6.12.3/220515 and Doc No PBB/HR/(0)/0752015. For matters related to termination of employment and retirement,

**RSPO PUBLIC SUMMARY REPORT**

<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
resources is in place.	and made available to the workers and their representatives where applicable.		these are contained in employment contracts, which are available to workers and their representatives. Clause 2 of the employment contract states that retirement age for workers is 60.
	3.5.2 Employment procedures are implemented, and records are maintained.	Yes	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, and records maintained. No termination has been carried out, and so this could not be verified during the audit. Hiring process of submitting job application, interviews, medical check-ups, issuance of offer letters, and performance assessments were sighted for Malaysian workers.
3.6 An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	Yes	Occupational safety and health policy is available in English and Bahasa Malaysia. The policy has been communicated to all levels of the organization through morning muster briefings and also displayed prominently at the notice board of the mill/estate office and Muster Ground. The hazard identification, risk assessment and risk control (HIRARC) procedure has been established. Sri Kamusan CU have conducted the risk assessment on all its operation as well as determining their control measures. It was also evident that the safety mitigation plans were implemented and monitored.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	Yes	Occupational health and safety (OHS) management plan for Sri Kamusan CU had been established. The OHS management plan sighted addressed issues related to hazards and risks, legal register and its requirements for compliance, OSH awareness and training program, accident and emergency procedures, audiometric test, use of PPE, OSH Committee meetings, etc. Generally, the OSH plans 2021 were acceptable.
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	Yes	Formal training programmes for 2020/2021 that covered aspects of the RSPO Principles and Criteria, with regular assessments of training needs were available for all the audited sites. Training Plan was for each operating unit were established. A training need identification matrix has been established with target dates for the training identified.
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	No	All executives, staff and workers has been trained in Sri Kamusan CU. Records of training were kept in the training file. The records included information on the title of the training, name and signature of the attendees, name of the trainer, time and venue. Staffs and workers at all estates are appropriately trained to covers applicable aspects of the RSPO

**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings
			P&C i.e. Fire Drill, IPM Training, Harvesting, Manuring, Loading Ramp, Scheduled Wastes etc., in a form they understand, and which includes assessments of training. Thus, previous Minor NCR has been remedied to all workers and staff only. However, during this recertification audit, certain records of trainings to covers applicable aspects of the RSPO P&C i.e., safety, environmental and social aspect was not available for contract workers i.e. FFB Driver. Thus, Major (Recurrence) NCR DA 03/2021 was raised.
	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.	No	RSPO and RSPO (SCCS) training was provided to all personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) at the Sri Kamusan CU in July 2020 trained by internal personnel. However, training record for employees (staff & weighbridge clerk) that carried out the tasks critical to the effective implementation of the Supply Chain Certification Standard at Sri Kamusan FFB Collection Center were not available. Thus, Minor NCR RAR 02/2021 has been raised.

**SUPPLY CHAIN REQUIREMENTS FOR MILLS**

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.1	Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, the inly MB Module is applicable.	NA	Not applicable since this mill is Mass Balance.
3.8.2	Mass balance Module A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill	Yes	Sri Kamusan POM received certified FFB from Sri Kamusan CU which is Sri Kamusan Estate, Hibumas 1 Estate, Hibumas 2 Estate, Sekar Imej, Jebawang Estate and Sapi Sugut Estate. And Uncertified FFB from Surrounding Smallgrower and Small holder which is 212 suppliers. Thus, Sri Kamusan POM has qualified for the Mass Balance chain system and

**RSPO PUBLIC SUMMARY REPORT**

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3 <sup>rd</sup> party certified supply base.		module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products. For details, refer to Table 3 in this report.
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	Yes	Available, as in Table 4 of this report.
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).	Yes	The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. The registration information were: Name: Sri Kamusan Palm Oil Mill Country: Malaysia Member Category: Oil Mil Core product: Palm Oil



**RSPO PUBLIC SUMMARY REPORT**

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.5	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>• Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard.</li> <li>• The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</li> </ul>	Yes	<p>Sri Kamusan's procedure dated in September 2020 [SKPOM-RSPO-SCC] describing the procedures on the following activities related on its supply chain certification standard required by the RSPO.</p> <ul style="list-style-type: none"> <li>- Training has been conduct in July 2020 for relevant personnel such as security, Weighbridge clerk, supervisor, and PIC related to SCCS Requirement.</li> <li>- Training Plan has been developed for the year of 2020 and 2021.</li> </ul> <p>During visit at Sri Kamusan POM staff, Weighbridge Clerk was able to demonstrate awareness of the organisation's procedures for the implementation of SCCS standard. Thus, previous NCR was satisfactory closed.</p>
3.8.6	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> <li>• Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> </ul>	Yes	<p>Internal audit has been conducted in July 2020. There is a supply chain procedure in file, SKPOM – RSPO – SCC dated Feb 2020. The internal audit procedure also covered the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. The CU also received a memo "<i>Jangan Menampilkan logo RSPO dan tanda dagang RSPO</i> dated 02/01/2018". Results from internal and external audit has been brought to management for review.</p>

**RSPO PUBLIC SUMMARY REPORT**

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<ul style="list-style-type: none"> <li>Effectively implements and maintains the standard requirements within its organisation.</li> <li>Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports.</li> </ul>		
3.8.7	<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	<p>Sri Kamusan POM had received certified FFBs from the CU's own supply bases as well as non-certified FFBs from outsiders. There were Sri Kamusan Estate, Hibumas 1 Estate, Hibumas 2 Estate, Sekar Imej, Jebawang Estate and Sapi Sugut Estate. And Uncertified FFB from Surrounding Smallgrower and Small holder which is 212 suppliers. The Weighbridge Clerk checked and verified the consignment notes issued by the supplying estates for the in-coming RSPO and non-RSPO FFBs. SKPOM still kept copies of the FFB Consignment Notes or FFB Delivery Notes issued by the supplying estates. Based on inventory record no overproduction for CSPO and CSPK from period March 2020 to April 2021.</p>

**RSPO PUBLIC SUMMARY REPORT**

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single-documents or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documentation and specification documentation):</p> <ul style="list-style-type: none"> <li>a) The name and address of buyer;</li> <li>b) The name and address of the seller</li> <li>c) The leading or shipment/delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation</li> <li>i) A unique identification number</li> </ul>	Yes	<p>Documented procedures related to sales and goods out were sighted and found adequate. Based on verification during the audit, BPOM has deliver certified materials to end buyer such as Lahad Datu Edible Oil Sdn Bhd (KCP), and Sandakan Edible Oil Sdn Bhd. Therefore, following are sample of certified CPO &amp; PK sales which comply to standard requirement.</p>
3.8.9	<p>Outsourcing Activities</p> <p>(i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant</p>	Yes	<p>Sri Kamusan POM has outsourced to the three (3) transportation of certified CPO and certified PK. An agreement covering the outsources activity were sighted. It has been noted that the contract agreement has highlighted the information on the implementation of RSPO standard. There is also stated in the contract point no. 8 that the transporter shall comply with 'to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary'. The training has been carried out in July 2020.</p>

**RSPO PUBLIC SUMMARY REPORT**

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>requirements of this RSPO SC Certification.</p> <p>(ii) The mill shall ensure the following:</p> <ul style="list-style-type: none"> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> <li>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary.</li> <li>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.</li> </ul>		
3.8.10	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	Yes	List of contact person for both transporters were made available and up-to-date in the stakeholder list and was updated on January 2021.
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	Yes	There were no new contractors used for the processing or production of RSPO certified materials

**RSPO PUBLIC SUMMARY REPORT**

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.12	i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	Yes	Sighted CPO and PK delivery note, weighbridge ticket, production data, internal audit and management review records were found up-to-date.
	ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	Yes	Relevant record was maintained for more than 2 years as per Standard operating procedure for Sustainability Supply Chain
	iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	Yes	Not applicable since Sri Kamusan POM was using Mass Balance Module.
	iv) For Mass Balance Module, the mill: a. shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.)	Yes	SKPOM has maintained the three-monthly basis accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK. Record titled as <i>“RSPO &amp; MSPO Mass Balancing Record for Oil Mills. The Mass Balance Record for Oil Mills –SKPOM indicated both positive balances for the certified CPO and palm kernel</i>
3.8.13	Extraction rate The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall	Yes	Sri Kamusan POM process all the received certified crop & their processing output will be based on their actual Oil Extraction Rate (OER) as well as Kernel Extraction Rate (KER).

**RSPO PUBLIC SUMMARY REPORT**

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	determine and set their own extraction rates based upon past experience, documented and applied it consistently.		
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Yes	
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	Yes	Not applicable since Sri Kamusan POM was using Mass Balance Module.
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform</p>	Yes	The registration of transaction being carried out by Sustainability and supply chain department from HQ subordinate. Mill receive copy of transaction input to the system on monthly basis based on contract summary (buyer weight being put in).
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with</p>	Yes	Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. SKPOM has not use RSPO corporate logo as well as trademark logo.

**RSPO PUBLIC SUMMARY REPORT**

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	the RSPO Rules on Market Communications and Claims.		

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

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

Clause	Indicators	Comply Yes/No	Findings
4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	Yes	Policy to protect human rights is contained in Human Rights Policy reviewed in 2015 and signed by the Chairman and CEO. The Human Rights Framework dated in May 2019 provides for protection for HRD and Whistle blowers and states that no reprisals would be taken against whistle blowers and HRDs. Similarly, the Whistleblowing Policy dated in Feb 2018 also aims to protect whistle blowers from reprisals or victimisation. During this recertification audit, the understanding among all levels of workforce and local communities of what HRD and the prohibition against retaliation towards HRDs has increased in comparison with that observed in last audit.
	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 in interviews held with local communities and workers, there is no evidence of instigation of violence or harassment in any of the operations at Sri Kamusan CU
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.	4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	Yes	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.
	4.2.2 Procedures are in place to ensure that the system is understood	Yes	Procedures are in place called "consultation and communication procedure, document no: RSPO 6.2" to ensure affected parties understand the Dispute and Resolution Procedures. Verbal explanation is given in an easy-to-understand language accompanied by pictorial explanations,

**RSPO PUBLIC SUMMARY REPORT**

<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	by the affected parties, including by illiterate parties.		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 Sri Kamusan CU keeps parties to a grievance informed of progress. The status progress was updated 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	Sri Kamusan CU is able to demonstrate that contributions to community development have been made based on consultation results with the local communities. This was confirmed during audit interview with the local communities. Other contributions to the local community developments based on consultation include villagers' access to free medical treatment at the estate clinic, and job opportunities.
4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.	4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available.	Yes	It has been verified that the land titles were for planting either oil palm or agricultural crops for economic value. It has been confirmed that PPB Plantation has the right to use the land which was legitimately owned by their company. Evidence of legal ownership of the land including history of land tenure was verified during this audit. Each estate was provided with legal use of the land through a Country Lease signed by the Director of Lands and Surveys of Sabah following the payment of premium. This document was made available by all the individual estates. It was also confirmed that there was no history of customary land tenure, recognised Native Customary Right (NCR) land. There was based on interview with village Representative.



**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	Yes	As verified during audit in 2016, the auditor was informed by Hibumas 2 Estate that the community from Kg. Banang has encroached illegally into the Hibumas 2 Estate land which was conserved for flood area. Auditor had interviewed representatives from Kg. Banang during the recertification audit in order to understand the issue. Auditor has confirmed that the conflict area was belongs to Hibumas 2 Estate as stated in the land title.
	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	The villagers from Kg. Banang have planted oil palm in the conservation area which was functioning as flood area for Hibumas 2 Estate. Hibumas 2 Estate has conducted survey and marked estate boundary in order to confirm estate boundary with Kg. Banang on 16/11/2015. Series of meeting minutes between Hibumas 2 Estate and representatives from Kg. Banang (Nunun Bin Ajib) was verified by auditor. Both parties have met and discussed the land issue to find the best solution on the illegal encroachment by Kg. Banang (on 01/11/2015, 9/7/2015, 6/7/2015, 25/6/2015, 26/5/2015 and 8/4/2015). The issue was also discussed with the Telupid District Officer and Beluran Land Office. Chronologies of the issues:
	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	<ol style="list-style-type: none"> <li>1. In 1988, 17 people from Kg. Banang and Mr Nunun Ajib had applied for 270 acres of land.</li> <li>2. In 1989, Sandakan Land and Survey Department commented that out of 270 acres land applied, 120 acres are state land and can be allocated to the applicant.</li> <li>3. In 1996, Beluran Land Use Working Committee meeting supported the land application for only 120 acres.</li> <li>4. Only in 1999, Beluran Land Office (thru Penolong Pemungut Hasil Tanah) send a letter to Director of Land and Surveyor in Kota Kinabalu the approval from Beluran Land Office of the application and seeking further action from Kota Kinabalu land office.</li> <li>5. On 27/12/1999, Pengarah Jabatan Tanah dan Ukur Kota Kinabalu has requested comment from JuruUkur Daerah Sandakan, Ketua Pegawai Pertanian Bahagian Sandakan, Ketua Pegawai Perhutanan Wilayah Sandakan when the applicant was approved by Mesyuarat Jawatankuasa Kerja Penggunaan Tanah Daerah Beluran dated 16/10/1996 for agriculture at Kg. Banang, Sugut, 270 acres.</li> <li>6. In April 2015, Kota Kinabalu land and Surveyor suggested that all land application in the said land to be revoke on the ground that the said land applied for was in a titled land.</li> <li>7. Juruukur Daerah Sandakan has issued an official letter dated 23/4/2015 to Penolong Pemungut Hasil Tanah Beluran to inform that the application of Mr Nunun Ajib and 17 applicants for the said land has been granted to no. 085340110. Therefore, the application by Mr Nunun Ajib and 17 others was suggested to be rejected.</li> <li>8. Hibumas 2 Estate has made a police report on illegal encroachment by Kg. Banang on the estate land dated 24/4/2015.</li> </ol>
	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	The last meeting with Kg. Banang was conducted on 8/4/2015. There was no meeting conducted after that although Hibumas 2 Estate was trying to discuss on the land dispute. The representative from Kg. Banang refuse to discuss on the land dispute with Hibumas 2 Estate. Further details were provided in the confidential version of this report. As of 2020, auditor has verified that Hibumas 2

**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings
			<p>and Jebawang Estate management has conducted a meeting with representative from Kg Banang on dated 29/3/19. The updated issue is the villagers ask to expand the Land for new generation and regarding the 487 acre the land was not all belonging to Hibumas 2, the land also include the IJM plantation which is 15 acres from their land title and management need to discuss with them. Auditor also goes to the village to meet the villagers, and the representative has confirmed the info.</p> <p>There were also 2 new issues of land claim first by claimant from Kg Tapat, for 5 acres land belongs to Hibumas 2. The claimant has applied and reported to the Land Department, Beluran and currently waiting for the update and result. The last one is claimed by another claimant from Kampung Sungai-Sungai, supported by YB Sugut and and the claim was made known to the management. The CU Management is currently waiting feedback from Land Department of Kota Kinabalu.</p>
	4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).	Yes	Auditor has verified on land issue at Hibumas 2 Estate, where Wilmar still in process to develop map of encroached area. EHS officers has monitored the area by monthly basis & found that no further encroachment until this audit in 2021.
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	Yes	All relevant information was available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.
	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	Communities from Kg. Banang was represented by their village head. The representatives were chosen by the communities.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	Yes	The implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. As explained in indicator 4.4.2, it has been verified that the land is now legitimately owned by Wilmar Sri Kamusan CU since 1988. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was

**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings
			verified by the auditor. There were no new issues regarding land with villagers, local community and neighbouring estate.
<p>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.</p>	<p>4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p>	Yes	<p>Based on Social Impact Assessment (SIA) Report for Sri Kamusan CU and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is legitimately owned by Wilmar Sri Kamusan CU since 1988. The audit team had confirmed that there were no land issues related to previous owners except for the new claim made by stakeholder as per explained in indicator above.</p>
	<p>4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p>	Yes	<p>As explained in Indicator 4.4.1, it has been verified that the land is now legitimately owned by Wilmar Sri Kamusan CU since 1988. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no new plantings in Sri Kamusan CU</p>
	<p>4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-</p>	N/A	<p>There were no new plantings in Sri Kamusan CU. Thus, indicator was not applicable</p>

**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings
	coercive and entered into voluntarily and carried out prior to new operations.		
	4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	N/A	There were no new plantings in Sri Kamusan CU. Thus, indicator was not applicable
	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.	N/A	There were no new plantings in Sri Kamusan CU. Thus, indicator was not applicable
	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.	N/A	There were no new plantings in Sri Kamusan CU. Thus, indicator was not applicable
	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.	N/A	There were no new plantings in Sri Kamusan CU. Thus, indicator was not applicable

**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings
<p>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.</p>	<p>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.</p>	<p>Yes</p>	<p>In the event of a dispute, the Sri Kamusan CU will manage it through the “Dispute and Grievances Procedure”. The Dispute and Grievance Procedure commences with the receipt of complaint from any party, its investigation, proposed solutions and acceptance of the solutions or otherwise. If the proposed solution was rejected, the dispute will be brought for third party arbitration. Grievance or dissatisfaction and request for services on the part of the employees can be conveyed through the “Borang Aduan (Complaints Form)” and the “Borang Permohonan (Request Form)”.</p> <p>In accordance with the Dispute and Grievances Procedure, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department at the Wilmar Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.</p>
	<p>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.</p>	<p>Yes</p>	<p>In accordance with the “Dispute and Grievances Procedure”, the procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established. However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers at mill and visited estates.</p>
	<p>4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p>	<p>Yes</p>	<p>There were no scheme small holdings at Sri Kamusan CU. The Fresh Fruit Bunches are supplied from Wilmar owned estates which are certified to RSPO and surrounding independent smallholder/Villagers.</p>
	<p>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.</p>	<p>Yes</p>	<p>All relevant information’s at the Sri Kamusan CU are made available in appropriate forms and languages. The following relevant documents were made available in Bahasa Malaysia, which is a language that every party was conversant in, were made available, sighted and verified during the audit:</p> <ul style="list-style-type: none"> <li>• Employment contracts of workers.</li> <li>• Action Plan for the Social Impact Assessment (2019 – 2020)</li> <li>• All evidence regarding land claim since 2015 are made available to everyone upon request.</li> </ul>
<p>4.7</p>	<p>4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p>	<p>Yes</p>	<p>In the event of a dispute, Sri Kamusan CU will manage it through the “Dispute and Grievances Procedure”. The Dispute and Grievance Procedure commences with the receipt of complaint from any party, its investigation, proposed solutions and acceptance of the solutions or otherwise. If the proposed</p>

**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings
<p>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.</p>			<p>solution was rejected, the dispute will be brought for third party arbitration. In accordance with the Dispute and Grievances Procedure, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department at the Wilmar Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.</p>
	<p>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.</p>	<p>N/A</p>	<p>There were no new plantings in Sri Kamusan CU. Thus, indicator was not applicable</p>
	<p>4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.</p>	<p>N/A</p>	<p>There were no new plantings in Sri Kamusan CU. Thus, indicator was not applicable</p>
<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>The right to use the land was demonstrated and not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights. As explained in indicator 4.4.2, it has been verified that the land is now legitimately owned by Wilmar Sri Kamusan CU since 1988. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no new issues regarding land with villagers, local community and neighbouring estate.</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</p>	<p>Yes</p>	<p>The right to use the land was demonstrated and not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights. As explained in indicator 4.4.2, it has been verified that the land is now legitimately owned by Wilmar Sri Kamusan CU since 1988. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no new issues regarding land with villagers, local community and neighbouring estate.</p>

**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings
	of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.		
	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).	Yes	The right to use the land was demonstrated and not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights. As explained in indicator 4.4.2, it has been verified that the land is now legitimately owned by Wilmar Sri Kamusan CU since 1988. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no new issues regarding land with villagers, local community and neighbouring estate.
	4.8.4 For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).	Yes	The right to use the land was demonstrated and not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights. As explained in indicator 4.4.2, it has been verified that the land is now legitimately owned by Wilmar Sri Kamusan CU since 1988. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no new issues regarding land with villagers, local community and neighbouring estate.

**Principle 5: Support smallholder inclusion**

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

Clause	Indicators	Comply Yes/No	Findings
5.1 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	Yes	During the audit, it was verified that the current and past prices for FFB (year 2021 Jan – April 2021) was displayed at the notice board near the Sri Kamusan Palm Oil Mill weighbridge.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Yes	Sri Kamusan regularly explains the FFB Pricing to Smallholders. Training/briefing were conducted at Sri Kamusan POM. The stakeholder information briefing concerned to FFB qualities, FFB grading, calculation payment by MPOB, oil extraction rate (OER). The calculation method of pricing was made known and given to the Smallholders. Field days were organised monthly by the mill to all the small holders from the supplying list.

**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Yes	The FFB prices in Sri Kamusan POM was adopting from the MPOB Pricing. All prices are calculated by the MPOB and the mill take the price and follow what MPOB guided. Interview with individual who are sending FFB to Sri Kamusan POM revealed that they are satisfied with the current price and they are of the opinion that Sri Kamusan POM Mill quantum is quite fair compare to other outsider Mills.
	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 contract or bond for FFB outside supplier sending crop to the Sri Kamusan POM. The Suppliers are freely to choose the mill choice of theirs.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	Yes	Interviews were conducted with the transport confirmed that contract entered into are valid, fair and transparent as the terms of payment are being negotiated upon prior to signing. Contract with suppliers were drafted in the English language, which is understood by the suppliers, as verified during interviews.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	Yes	All contractor confirmed that payments were received within a reasonable timeframe which is 7-10 days after submission of invoice. And receipts contain specifying price, weight, deductions and amount paid are given.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	Yes	Weighing Equipment in Sri Kamusan POM has been calibrated on a yearly basis using Metrology Corporation Malaysia Sdn Bhd.
	5.1.8 The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	Yes	Wilmar supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. Sighted that latest Stakeholder meeting in May 2019 to promote on RSPO certification. However, the Growers and villagers were not in favor in the implementation due to high cost.



**RSPO PUBLIC SUMMARY REPORT**

<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	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	Procedure on “Dispute and Resolution Procedure” and Wilmar Group Whistleblowing Policy are in-place.
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	There was no smallholder group in Sri Kamusan. The Growers and villagers were not in favor in the implementation due to high cost.
	5.2.2 The unit of certification develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	Yes	Wilmar supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. However, the Growers and villagers were not in favor in the implementation due to high cost
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	Yes	As above.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	Yes	As above.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	Yes	Currently Wilmar has created a system to trace their stakeholder around their estates. But so far growers and smallholders in Sabah are willing to join the WAGS to get certification but for smallholder around SKPOM CU doesn't want to involve because of financial restriction. But Wilmar do have a report and always publicly available in their website.

**RSPO PUBLIC SUMMARY REPORT**

**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	Sri Kamusan CU subscribes to Wilmar's Equal Opportunity Policy. This policy sets out the CU's position on equal opportunity in all aspects of its employment including recruitment, training and promotion. It was publicly available at all estates and the Mill. The policy statement emphasised its support for the principle of fairness and non-discrimination, and aims to treat individuals with dignity and respect, free from unlawful and unethical discrimination. It aims not to discriminate on gender, race or ethnic origin, disability, sexual orientation, age, or faith; but to build a global and able workforce that is based on meritocracy.
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.	Yes	Apart from the Social Policy which states that all employees shall be treated equally, there is also no evidence that there has been any form of discrimination against any employee, or group of employees. As confirmed by the workers during interviews and field observation, payment of wages/salaries, provision of housing and access to benefits and amenities is fair based on observation, review of pay checks, contracts of employment, and interviews of staff, local and foreign workers. Foreign workers are also accorded the same living standards and accommodations as local workers. The Company is also responsible for worker levy, medical check-up, work pass, agency processing fees and insurance. The worker only pays fees related to passport renewal.
	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 at the Sri Kamusan Estate, pregnancy tests were conducted when the workers presented themselves at the estate clinic and not conducted in a discriminatory manner. Sri Kamusan CU has collaboration with Klinik Kesihatan Lingkabau & Klinik Kesihatan Sungai-sungai for monthly monitoring health of mother and children and immunisation programme for baby.
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as	Yes	The gender committees throughout the Sri Kamusan CU are known as the Women and Children Committees. Membership comprises 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,

**RSPO PUBLIC SUMMARY REPORT**

<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	opportunities and improvements for women.		immunization and education, as well as women's reproductive rights and to conducted assessment need for new mothers.
	6.1.6 There is evidence of equal pay for the same work scope.	Yes	The equal opportunities policy was updated in Nov 2019 which states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. The Social Policy was displayed on notice boards in both Bahasa Malaysia and English. And interview with workers local female, migrant (Indonesia) and local male they agreed that they receive equal pay for the same work scope. For example, Sprayer gang has been paid by piece rate and the same gang also receive the piece rate pay, for harvester also they receive same rate as all harvester in the estate, only the difference is the rate for tall palm and the short palm. For mill and estate general workers they receive daily payment as per Minimum Wages order 2018.
6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).	6.2.1 (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.	Yes	The employment contracts issued to all Sri Kamusan CU workers (local and foreign) have been prepared in Bahasa Malaysia and are generally available to the workers. The documents have been the prepared in accordance with the requirements of the Sabah Labour Ordinance. Pay conditions are also contained in the employment contracts.
	6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.	Yes	Contracts and conditions of employment are contained in employment contracts signed between the Mill and respective estates on one hand, and their workers on the other. The employment contracts sampled were prepared in either Bahasa Indonesia or in dual-language, namely English and the language commonly used in the worker's country of origin. Among others, the contracts defined the period of employment, wage rate, work benefits, overtime, annual leave, public holidays, contract termination, etc. Details on monthly salary and deductions for every worker and staff are reflected in their pay slips which are issued to the workers during pay day.
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	Yes	It has been verified that Sri Kamusan Palm Oil Mill has taken action on regular working hours as determined by the Sabah Labour Ordinance and stipulated in employment contracts are being adhered to. Any work in excess of 8 hours was being compensated as overtime. This is based on punch cards and pay slips reviewed, and interviews held with workers at the Sri Kamusan Palm Oil Mill.

**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings
			Workers who have been certified ill are given paid medical leave, and this is the same for workers who have gone on maternity were given 2 months paid maternity leave as evidenced from the pay slips of female workers at Jebawang Estate (weighbridge operator). Salary deductions are made for EPF, SOCSO, EIS (local workers) 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.
	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.	Yes	Evidence is available that Sri Kamusan CU provides adequate housing and facilities in accordance with the requirements of the Workers' Minimum Standard of Housing and Amenities Act 1990. It was observed during the audit that all Estates has provide adequate housing, sanitation facilities, medical, educational and welfare amenities to national standards or above to checkroll workers, local workers, foreign workers, and contract workers. The houses were in good condition with treated and clean water, good state of repair and sanitary condition, good drainage system. Also sighted during the audit all the children between the ages of 5 to 10 years were receiving education at HUMANA. It was confirmed through interview with parents, and HUMANA teachers. Housing inspection at Parcel P13 was last conducted in weekly basis and linesite inspections are being carried out at least once a fortnight by the Health Assistants sometimes together with the Visiting Medical officer,
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	Yes	All units within Sri Kamusan CU have their own canteen/grocery store which sells basic items such as eggs, flour, rice, vegetables, frozen food such as fish, meat, onions, etc. Items seen in the stores are adequate, clearly labelled and within the expiry dates. Workers interviewed informed that they purchase items from these stores, and are able to either pay in cash, or on credit.
	6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.  PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a "decent living wage" is in place.	Yes	Based on pay slips sighted, all sampled workers who complete the number of days offered in a month receive at least minimum wages applicable, which is RM1,100 per month, or more. Sri Kamusan CU also has carried out the calculation of prevailing wages and in-kind benefits, the calculation took into account housing, electricity, water, education, childcare and healthcare. Based on the breakdown given, the calculation of prevailing wages including in-kind benefits is reasonable.

**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings
	<p>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"> <li>• An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers.</li> <li>• There is annual progress on the implementation of living wages</li> <li>• Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment.</li> <li>• The unit of certification may choose to implement the “living wage” payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation</li> </ul> <p>Until such time where the Malaysian version of “decent living wage” has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid.</p>		
	6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	Yes	During site visits at all estates & mill at Sri Kamusan CU was sighted all workers has been hired as full-time employment.
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	6.3.1 (C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.	Yes	A published statement recognizing freedom of association is available. It is contained in Clause 3 of Wilmar’s No Deforestation, No Peat, No Exploitation Policy. 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. This Policy is available in English and Bahasa Malaysia, and explained to the workers during muster briefings.
	6.3.2 Minutes of meetings between the unit of certification with trade unions or workers	No	There were no trade unions at Sri Kamusan CU. However, the Workers’ Welfare and Social Committees have been established at every unit. The Committee comprise management

**RSPO PUBLIC SUMMARY REPORT**

<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.		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 during audit. However, during site visit at Sri Kamusan Estate workers representatives for Workers' Welfare and Social Committees have been elected by management. and at Sapi Sugut Estate & Jebawang Estate no representative from contractor Thus, Minor NCR RAR 03/2021 has been raised.
	6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	Yes	Evidence is available that 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. However, some of workers representative especially for mandore has been selected by management NCR has been raised refer to indicator 6.3.2 has been raised.
6.4 Children are not employed or exploited.	6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	Yes	Sri Kamusan CU subscribes to Wilmar's Child Protection Policy, last reviewed in January 2018. The Policy states Wilmar does not tolerate child labour, any forms of child exploitation and child abuse. The prohibition against child labour is included in all service contracts and supplier agreements.
	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	Based on documentation review (master checkroll, personal files containing copies of passport, KTP or Malaysian IC), interviews conducted and observations in the field, all employees were above the age of 18 when they commenced work at Sri Kamusan CU.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	Yes	There was no evidence that the estates and the mill at Sri Kamusan CU employ anyone below the age of 18 years. Auditor also verify through the contractors in the CU's and confirmed there is no Contractor workers available in the estate and mill.
	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 dated January 2018 which states that the company does not tolerate child labour, any forms of child exploitation and child abuse was given to external stakeholders during stakeholder meetings, Policy briefings to workers, and during induction trainings for new workers.

**RSPO PUBLIC SUMMARY REPORT**

<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
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	A Policy against sexual harassment has been established. This Policy is used to guide procedures to be taken in the event of sexual harassment incident, and communicated to all staffs and workers during morning muster and via the Women and Children Committee meetings. Interviews held with workers (male, female, local, foreign) confirmed their understanding of this Policy. The related training given to the workers was reported in Indicator 4.1.1
	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 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. Additionally, an SOP and Policy for Maternity Leave and Allowances, gives the rights of maternity leave and allowances subject to the fulfilment of the terms and conditions. This Policy is applicable to all female workers, including foreign female workers. These Policies were communicated to all levels of workforce during muster briefings, Policy awareness briefings and via the Women and Children Committee meetings.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	Yes	It was evident that the CU has already assessed the needs of new mothers. Sighted the request from new mothers has been approved by manager.
	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	The Sri Kamusan 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. This SOP is also accompanied by a flowchart. The flowchart was displayed at all units within Sri Kamusan CU.
6.6 No forms of forced or trafficked labour are used.	6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited: <ul style="list-style-type: none"> <li>Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>Charging the workers for recruitment fees</li> </ul>	Yes	All workers in Sri Kamusan CU in Estate and Mill have entered into employment voluntarily, it was verify during the interview with Indonesian and local workers. The workers know they will work in Oil Palm Sector since from their country. The mill and all visited estates have given back passport to foreign workers as verified during interviewed with the workers. However, the foreign workers request the office to keep their passport due to safety reason without any force from Sri Kamusan Management as verified through 'Consent for Passport Safekeeping. Foreign workers also are freely to take back their passport after filling in ' <i>Borang Pengambilan Passport</i> '. All the passport are stored in the safe locker in estates and mill offices with name of worker, passport number. Workers also confirmed there is no involuntary overtime as they will work for overtime if management ask to, they also

**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings
	<ul style="list-style-type: none"> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty to the workers for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>		understand their contract which was saying that they can resign from the company with 8 weeks of notice and they also don't have debt of bondage.
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	Yes	There is a special labour policy and procedures established known as "Recruitment of Workers" that spells out the recruitment process. It was evident that the above SOP is being implemented within the Sri Kamusan CU.
6.7 The unit of certification ensures that the working environment under its control is safe and without undue risk to health.	6.7.1 (C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.	Yes	Estate(s) and Mill Managers were appointed as responsible person(s) for safety and health issues and also chairman for OSH Committee. The Manager subsequently assigned duties of OSH coordinator to the Assistants or medical assistant for the down line implementation of OSH practices in the estate and mill. Records of regular meetings between the responsible person and workers to discuss about health and safety had been verified to the satisfactory maintained. Occupational Safety Health (OSH) Committee has been established together. OSH Committee meetings were held once in three months. The minutes of meetings reviewed accordingly.
	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.	Yes	Emergency Response Plan (ERP) was established. 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 at mill and estates annually. The records of the training refer indicator 3.7.2. First Aid boxes were available at work operations in the field in all estates and mill. Telephone numbers and names of the members of the Emergency Response Team (ERT) were communicated to all employees and displayed at notice boards. Telephone numbers of the PIC, Police Station, Fire Brigade, and <i>Klinik Kesihatan</i> were also included. The accident statistics were being maintained in a satisfactory manner and periodically reviewed. Accident/injury record were recorded using Lost Time Accident during fiscal monthly basis. Quarterly review on accident cases had been carried out during quarterly OSH committee meeting.
	6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all	No	All staff and workers such as the storekeepers, harvesters and sprayers were continuously trained, and random interviews conducted showed that they had understood the hazards involved and the usage and handling of chemicals in a safe manner.



**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings
	<p>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>From the site visit or inspection as pe mention area above, spraying activities, harvesting activities, manuring activities and LF collection, the workers were seen to wearing appropriate PPE such as face masks respirators, goggles, rubber boots, nitrile gloves, apron and hard hat, to cover all potentially hazardous operations. However, site inspection at Jebawang Estate Block 5, sighted 2 sprayers woodies Epiphyte did not wear appropriate PPE i.e., apron and goggle according to SSOP and HIRARC. With this repeated findings, Major (Recurrences) NCR DA 04/2021 was highlighted accordingly.</p> <p>Apart from the above, workers have been provided free of charge PPE. And, the sanitation facilities for those applying pesticides was available near to chemical store area, after completed spraying activities, the workers will change out of PPE, wash and put on their personal clothing at the area. Meanwhile, during site inspection estate and mill workshop, most of the moving part and rotating machinery were installed with machine guarding and properly covered.</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 &amp; Foreign workers are covered by SOCSO (<i>Pertubuhan Keselamatan Sosial</i>). The "<i>Jadual Caruman Bulanan</i>" were rsampled and reviewed accordingly.</p>
	<p>6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p>	<p>Yes</p>	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics. Sighted the Sri Kamusan CU has maintained and updated the LTA Summary by monthly basis.</p>

**RSPO PUBLIC SUMMARY REPORT**

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

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

Clause	Indicators	Comply Yes/No	Findings
7.1 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.	7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control.	Yes	All 4 Estates sampled was implementing IPM as per Wilmar International Limited Agriculture Manual & Standard Operating Procedure for Oil Palm 3/2011 -Chapter 8, for the various field operations. In order to minimize the use of pesticides, all 4 Estates had planted beneficial plants, mainly <i>Tunera subulata</i> , and some <i>Antigonon leptopus</i> with maps indicating areas planted. All 4 Estates had in place documented IPM plans which covered Monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides. The estates have carried out monthly detection and observation of leaf eating pests, mammalian pests and diseases like Ganoderma and Stem Rot. These monthly detection and observations were carried by staff and records of observation were sighted. Records showed no outbreak had been taken place. No rat baiting had been carried out in 2020 & 2021.
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	Yes	Species referenced in the Global Invasive Species Database and CABI.org. were not used in managed areas of the 4 estates.
	7.1.3 There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	Yes	All 4 Estates was using Wilmar International Limited policy of no open burning. As advocated, the 4 estates practiced Zero burning, thus no use of fire for pest control had been practiced. Furthermore, there had been no out breaks of Pest attack.
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. Selective products and application methods that are specific to the target pest, weed or disease are prioritized. All 4 Estates has used agrochemicals based on the Wilmar International Limited Agriculture Manual & Standard Operating Procedure for Oil Palm 3/2011, Chapter 6 & 8. The manual has included a chemical register list which indicates the purpose of usage (intended target), hazards signage, trade and generic names as well as the specific targets and the correct dosage of agrochemicals to be used. All chemicals usage was based on the "need to do basis" to enhance field operations. It was found that no Class I chemicals had been used.

**RSPO PUBLIC SUMMARY REPORT**

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.	No	Sri Kamusan CU has a record of areas where pesticides had been used. Pesticides are used only when justified and areas used are recorded in store issue chits, bin cards, program sheets, SAP System (System Applications and Products in Data Processing), costing records and progress reports. Records of pesticides used by area, quantity used, hectares applied in 2020 and 2021 were available. However, at time of audit it was noted that on Sri Kamusan Estate, Hibumas 1 Estate and on Sapi Sugut Estate the amount of active ingredients of pesticides used were not maintained correctly and the Major NCR STK 02/2021 was issued.
	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 estates as per the IPM plan has manage pests, other than weeds, at below threshold levels. No prophylactic spraying had been carried in all estates. The estates in order to minimise pesticide usage, do not carry out calendar baiting of rats. Rat baiting was only done as and when required and only in areas where census showed fresh damage above threshold level of 5%. Furthermore, in order to minimise the use of weedicide only spraying of circle and paths had been carried. Spraying is only carried as per program. Weeds in the inter rows are mainly slashed with minimum spraying. No chemicals were used for VOP control. The VOPs were manually removed. Slashing woody growths, weeds and manual removal of VOPs was witnessed by auditors.
	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 areas. All 4 Estates 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 all 4 Estates had not use chemicals categorized as World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions. All the pesticides used were those registered under the Pesticides Act 1974 (Act 149). The list of approved pesticides was available for reference.

**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings
	7.2.5a Judgment of the threat and verify why this is a major threat.	N/A	Not applicable - As mentioned above in Indicator 7.2.5. of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat had been used. Hence, the need for a judgment of the threat does not apply on the Sri Kamusan CU.
	7.2.5b Why there is no other alternative which can be used.	N/A	Not applicable - As mentioned above in Indicator 7.2.5. of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat had been used. Hence, the need for other alternatives is not required on Sri Kamusan CU.
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	N/A	Not applicable - As mentioned above in Indicator 7.2.5. of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat had been used. Hence, the need to verify why there is no other less hazardous alternative does not apply on the Sri Kamusan CU.
	7.2.5d What is the process to limit the negative impacts of the application.	N/A	Not applicable - As mentioned above in Indicator 7.2.5. of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat had been used. Hence, the need for processes to limit the negative impacts of the application does not apply on the Sri Kamusan CU.
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	N/A	Not applicable - As mentioned above in Indicator 7.2.5. of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat had been used. Hence, the need to estimate the timescale of applications and steps taken to limit applications to the specific outbreak does not apply on the Sri Kamusan CU.
	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	Yes	<p>The estate and mill have the SOP for handling of chemical/pesticides. The employees involved in the chemical handling such as the storekeepers, lab operators, sprayers, fertilizer and P&amp;D 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. Appropriate safety and application equipment had been provided and used as per the CHRA.</p> <p>The trade and generic names of the chemicals were made known to them through the SDS training. It was also noted that SDS are available at chemical and fertilizers during the audit. Training records on pesticides/chemical handling was carried out regularly by the CU for knowledge about the activities, sighted.</p>

**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings
	applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.		
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	Yes	Pesticides selected for use were those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with OSH USECHH Regulations (2000). At all visited mill and estates the storage of pesticides was in accordance with recognized best practices. They were stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders and Pesticides Act 1974 (Act 149) and Regulations. All information regarding the chemicals affixed as product label and the accompanying Safety Data Sheet (see OHS CLASS 2013 Regulations) with details of its usage, hazards, trade and generic names were found available in Bahasa Malaysia language understood by workers or explained carefully to them by a plantation management official at operating unit level.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	Yes	Empty pesticide containers were 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 Sri Kamusan 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 aerial spraying has been practiced in the Sri Kamusan CU. This was also confirmed by interviewed workers
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat	Yes	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.

**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings
	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	Pregnant and breast-feeding women are not allowed to work with Pesticides & Hazardous Chemicals. The Medical Assistant (MA) conducted the check and determine whether female workers are pregnant. The check was carried out on monthly basis.
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.	No	Waste management and disposal plan to avoid or reduce pollution had been documented. The assessment seen effectively covers on matured maintenance, FFB collection, housing, workshop, schedule waste / chemical / fertilizer store and etc. Sampled the EFB collection from mill and the area/filed mulched. The waste disposed were seen only household and food waste and disposed via estates landfill. As for the line-site cleaning, it scheduled on weekly basis by Hospital Assistant. The domestic waste being collect by estate workers twice weekly and being segregate before goes to dumping site. In the meantime, for previous issues regarding Hibumas 1 Estate Landfill, sighted landfill was properly covered, with clear demarcation and signage to avoid disturbance. (Guidelines of RSPO MYNI 2019). Nonetheless, the waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics was still not effectively implemented. Hereafter, Major (upgraded) NCR DA 05/2020 has been issued
	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.  Disposal of empty pesticide containers were carried out as per established procedures. Triple rinsing procedures was continually implemented for empty pesticide containers. The rinsed containers were then pierced and stored prior disposal. Records on usage and disposal were well recorded and documented. Scheduled wastes had been disposed of through a licensed contractor approved by DOE.
	7.3.3 The unit of certification does not use open fire for waste disposal.	No	During audit at Sri Kamusan worker's quarters site and contract workers housing site at Block 11 Phase 1, traces of burnt waste were sighted. Interview with workers confirmed they had used fire for waste disposal. The unit of certification does use open fire for waste disposal. Thus, Minor NCR DA 06/2021 was raised.

**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings			
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 Estates have managed soil fertility as per the SOPs in the Wilmar International Limited Agriculture Manual & Standard Operating Procedure for Oil Palm 3/2011, Chapter 4 & 10. 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, Leguminuos cover crops, and <i>Nephrolepis biserrata</i> in the interline.			
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	Yes	From the Agronomist/Head R&D reports it was established that the estates continued to carry out periodic foliar and soil sampling to monitor changes in nutrient status. Annual foliar sampling, as per the SOP of EMU, for the nutrients N, P, K, Mg, Ca & B had been carried out in all estates by Borneo Samudera Sdn Bhd and the results formed the basis for the fertiliser recommendations to maintain and to improve soil fertility. The last foliar sampling done were carried out in May & July 2020. Soil analysis was carried out on a 6-year cycle basis. Latest analysis reviewed during audit.			
	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 sampled estates had a nutrient recycling strategy in place. Palm fronds were stacked in the fields to decompose and by EFB applications. Due to distance from the mill and having only matured Oil Palm only a limited amount of EFB application was programmed for Hibumas 1 Estate, no application for Jebawang Estate and Sapi Sugut Estate. The bulk of EFB was applied on Sri Kamusan Estate.			
	7.4.4 Records of fertiliser inputs are maintained.	Yes	Records of programs and applications of fertilisers were made available to auditors. Records showed that the main fertilisers applied in 2020 were NPK, GML, Prod and NK2. Records sighted showed that actual applied in 2020 was in line with program except on Jebawang and on Sapi Sugut, due to delivery issues on account of MCO.			
7.5 Practices minimise and control erosion and degradation of soils.	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	Yes	Maps identifying marginal and fragile soils, including steep terrain, and slope were available on all 4 Estates visited, prepared by EMU Mapping Department. There were no marginal and fragile soils in the CU. The soil series is as per table below:			
			Sri Kamusan Estate	Hibumas 1 Estate	Jebawang Estate	Sapi Sugut Estate
			Gong Chenak	Bukit Tuku	Bukit Tuku	Cherang Hangus
			Kampung Pusu	Chat,	Cherang Hangus	Lunas
			Kumansi	Cherang Hangus	Kechor	Musang
			Lunas	Gali	Rasau	Nangka
			Rasau	Gong Chenak	Stom	Stom
			Stom	Kampung Pusu	Tangong Lipat	Tanjong Lipat
			Talisai	Kechor,		Tebok
			Tanjong Lipat	Laka		
Unclassified	Local Alluvial Complex					

**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings																																
			<table border="1"> <tr><td></td><td>Lunas</td><td></td><td></td></tr> <tr><td></td><td>Musang</td><td></td><td></td></tr> <tr><td></td><td>Parit Botak</td><td></td><td></td></tr> <tr><td></td><td>Rasau</td><td></td><td></td></tr> <tr><td></td><td>Stom</td><td></td><td></td></tr> <tr><td></td><td>Talisai</td><td></td><td></td></tr> <tr><td></td><td>Tanjong Lipat</td><td></td><td></td></tr> <tr><td></td><td>Unclassified</td><td></td><td></td></tr> </table>		Lunas				Musang				Parit Botak				Rasau				Stom				Talisai				Tanjong Lipat				Unclassified		
	Lunas																																		
	Musang																																		
	Parit Botak																																		
	Rasau																																		
	Stom																																		
	Talisai																																		
	Tanjong Lipat																																		
	Unclassified																																		
	7.5.2 No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	Yes	<p>Wilmar International Limited had a management strategy for planting on slopes to minimise and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by:</p> <ul style="list-style-type: none"> <li>• Stated in the EIA report. <i>“Sebarang aktiviti pemajuan ladang kelapa sawit atau aktiviti pembersihan kawasan tidak dibenarkan di Kawasan berkecerunan 25 darjah atau lebih”</i>.</li> <li>• Item 2 of Chapter 3 in the Wilmar International Limited Agriculture Manual &amp; Standard Operating Procedure for Oil Palm 3/2011 -Land clearing and preparation “All steep areas with more than 25° and larger than 20 ha should not be cleared for development”.</li> </ul>																																
	7.5.3 There is no new planting of oil palm on steep terrain.	Yes	Sri Kamusan CU had a management strategy for planting on slopes to minimise and control erosion and degradation of soils. It was observed that there is no new planting of oil palm on steep terrain.																																
7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and 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 Wilmar International Limited Estates, to demonstrate the long-term suitability of land for palm oil cultivation, Sri Kamusan 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	As mentioned in Indicator 7.5.1, there were no marginal and fragile soils in the 4 estates visited.																																
	7.6.3 Soil surveys and topographic information guide the planning of drainage and	Yes	The management of all 4 Estates visited in Sri Kamusan CU continued to use Soil surveys and topographic information guide in the planning of drainage and irrigation systems, roads and other infrastructure. As																																



**RSPO PUBLIC SUMMARY REPORT**

<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	irrigation systems, roads and other infrastructure.		mentioned in Indicator 7.5.1 maps identifying marginal and fragile soils, including steep terrain, were prepared by EMU Mapping Department.
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 <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , Google Maps, Estate Maps and also through site visit to all four estates. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at Sri Kamusan CU. Furthermore, as per the soil maps prepared by EMU and site visits there are no peat soils on all 4 estates.
	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).	Yes	It was confirmed from the peat inventory submitted to the RSPO and site visits, the 4 Estates visited in Sri Kamusan CU do not have any peat soil. There also was supported by the soil maps prepared by EMU.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	Yes	It was confirmed from the peat inventory submitted to the RSPO and site visits, the 4 Estates visited in Sri Kamusan CU do not have any peat soil. There also was supported by the soil maps prepared by EMU.
	7.7.4 (C) A documented water and ground cover management programme is in place.	Yes	It was confirmed from the peat inventory submitted to the RSPO and site visits, the 4 Estates visited in Sri Kamusan CU do not have any peat soil. There also was supported by the soil maps prepared by EMU.
	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.	Yes	It was confirmed from the peat inventory submitted to the RSPO and site visits, the 4 Estates visited in Sri Kamusan CU do not have any peat soil. There also was supported by the soil maps prepared by EMU.

**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings
	<p>The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p>		
	<p>7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.</p>	<p align="center">Yes</p>	<p>It was confirmed from the peat inventory submitted to the RSPO and site visits, the 4 Estates visited in Sri Kamusan CU do not have any peat soil. There also was supported by the soil maps prepared by EMU.</p>
	<p>7.7.7 (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are</p>	<p align="center">Yes</p>	<p>It was confirmed from the peat inventory submitted to the RSPO and site visits, the 4 Estates visited in Sri Kamusan CU do not have any peat soil. There also was supported by the soil maps prepared by EMU.</p>

**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings
	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.		
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	Water management plan was available dated Jan 2021. Documented Water Management Plan Year 2021 inclusive of location; wastewaters produced; treatment/containment method; reuse/recycle/disposal method was sighted. Sri Kamusan CU also maintained monitoring records of water usage which recorded every day and summarised on monthly basis including the monitoring of rainfall water, which has been an alternative source of water as mitigation plan during draught season.
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	Yes	The continued availability of water sources and to avoid negative impacts on other users in the catchment has been conclude in the Environmental Compliance Report (ECR). ECR was conducted by Ekohandal Sdn. Bhd. The ECR assessment was carried one every 4 months.
	7.8.1b Workers have adequate access to clean water.	Yes	The worker’s quarters have adequate clean water supply by estate and mill management, the management also done the analysis to ensure water was safe for domestic use. Domestic water analysis results showed no adverse quality. Water analysis, both raw and treated water, conducted one every 3 months and send the water sampling at SGS Laboratory. Based on the result, water quality monitoring is generally within WHO at all monitoring points.
	7.8.2 (C) Water courses and wetlands are protected,	Yes	The estates have protected the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SOP Riparian, Floodplain &

**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings
	including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).		Water Bodies Management with revision dated December 2020 to maintain the buffer by restricting agrochemicals application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The signboards were displayed accordingly at the site where applicable. During the field visit at Sri Kamusan / Hibumas 1 / Jebawang / Sapi Sugut Estate there was no spraying activities, EFB application or signs left in such an area.
	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 2020/2021 and letter from Department of Environmental reviewed. An Effluent Treatment Plant (ETP) is available at Sri Kamusan POM to treat the POME. Effluent treatment process flow sighted in the Lay Out Effluent Pond. According to DOE's license, the disposal method of the final discharge is through land irrigation. The ETP was regularly maintained by desludging of the ponds to ensure its efficiency. Final discharge samples were taken on monthly basis and sent to an accredited laboratory for analysis. The results of analysis were submitted to the DOE on quarterly basis. All parameters were within the regulatory limit such as BOD discharged to land irrigation 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. A slight inconsistent trend was noted. This was due to process cleaning of the mill.
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 by monthly basis compare with yearly baseline. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. Among the plan for improving fossil fuel are: <ul style="list-style-type: none"> <li>▪ Closely monitored operation of tractors</li> <li>▪ Minimise the electricity usage at workers housing</li> <li>▪ Replace light bulb with energy saving bulb</li> <li>▪ To switch off and unplug all the electrical equipment after used</li> <li>▪ Minimise the lubricant oil usage through using small tractor for FFB evacuation</li> </ul> Site visit to Sri Kamusan CU, showed evident that they are compiling the data and document it for further action to improve on their efficiency of using the renewable and non-renewable energy. Apart from use of grid electricity, palm fibre and shells were also used to generate electricity through biogas plant.
7.10 Plans to reduce pollution and emissions,	7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are	Yes	The CU had used RSPO Palm GHG version 4.0 Calculator as a tool to calculate the GHG emissions. Sighted report sends to RSPO on 03/05/2021. The input data was verified and the following were determined:

**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings																																										
including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.	implemented, monitored through the Palm GHG calculator and publicly reported.		<table border="1"> <thead> <tr> <th>Description</th> <th>tCO<sub>2</sub>e/t Product</th> <th>Production</th> <th colspan="2">t/yr</th> </tr> </thead> <tbody> <tr> <td>CPO</td> <td>0.34</td> <td>FFB Processed</td> <td colspan="2">345113.60</td> </tr> <tr> <td>PK</td> <td>0.34</td> <td>CPO Processed</td> <td colspan="2">71594.123</td> </tr> </tbody> </table>				Description	tCO <sub>2</sub> e/t Product	Production	t/yr		CPO	0.34	FFB Processed	345113.60		PK	0.34	CPO Processed	71594.123																									
			Description	tCO <sub>2</sub> e/t Product	Production	t/yr																																							
			CPO	0.34	FFB Processed	345113.60																																							
			PK	0.34	CPO Processed	71594.123																																							
			<table border="1"> <thead> <tr> <th>Land Use</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>OP Planted Area</td> <td>8048.85</td> </tr> <tr> <td>OP Planted on Peat</td> <td>0.00</td> </tr> <tr> <td>Conservation (forested)</td> <td>5104.67</td> </tr> <tr> <td>Conservation (non-forested)</td> <td>31.19</td> </tr> </tbody> </table>		Land Use	Ha	OP Planted Area	8048.85	OP Planted on Peat	0.00	Conservation (forested)	5104.67	Conservation (non-forested)	31.19																															
			Land Use	Ha																																									
			OP Planted Area	8048.85																																									
			OP Planted on Peat	0.00																																									
			Conservation (forested)	5104.67																																									
			Conservation (non-forested)	31.19																																									
Milling extraction rate:																																													
OER		20.75	KER		4.22																																								
Mill Emission																																													
<table border="1"> <thead> <tr> <th colspan="4">Own Crop</th> </tr> <tr> <th>Emission source</th> <th>tCO<sub>2</sub>e</th> <th colspan="2">tCO<sub>2</sub>e/tFFB</th> </tr> </thead> <tbody> <tr> <td>POME</td> <td>6344.69</td> <td colspan="2">0.02</td> </tr> <tr> <td>Fuel consumption</td> <td>512.24</td> <td colspan="2">0.00</td> </tr> <tr> <td>Grid electricity utilisation</td> <td>0.00</td> <td colspan="2">0.00</td> </tr> <tr> <td colspan="4"><b>Credits</b></td> </tr> <tr> <td>Export of excess electricity to housing &amp; grid</td> <td>-1.38</td> <td colspan="2">0.00</td> </tr> <tr> <td>Sale of PKS</td> <td>-16049.55</td> <td colspan="2">-0.05</td> </tr> <tr> <td>Sale of EFB</td> <td>0.00</td> <td colspan="2">0.00</td> </tr> <tr> <td><b>Total</b></td> <td><b>-9194.00</b></td> <td colspan="2"><b>-0.03</b></td> </tr> </tbody> </table>						Own Crop				Emission source	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB		POME	6344.69	0.02		Fuel consumption	512.24	0.00		Grid electricity utilisation	0.00	0.00		<b>Credits</b>				Export of excess electricity to housing & grid	-1.38	0.00		Sale of PKS	-16049.55	-0.05		Sale of EFB	0.00	0.00		<b>Total</b>	<b>-9194.00</b>	<b>-0.03</b>	
Own Crop																																													
Emission source	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB																																											
POME	6344.69	0.02																																											
Fuel consumption	512.24	0.00																																											
Grid electricity utilisation	0.00	0.00																																											
<b>Credits</b>																																													
Export of excess electricity to housing & grid	-1.38	0.00																																											
Sale of PKS	-16049.55	-0.05																																											
Sale of EFB	0.00	0.00																																											
<b>Total</b>	<b>-9194.00</b>	<b>-0.03</b>																																											
Plantation / field emission																																													
<table border="1"> <thead> <tr> <th colspan="4">Own Crop</th> </tr> <tr> <th>Emission sources</th> <th>tCO<sub>2</sub>e</th> <th>tCO<sub>2</sub>e/ha</th> <th>tCO<sub>2</sub>e/FFB</th> </tr> </thead> <tbody> <tr> <td>Land Conversion</td> <td>65362.60</td> <td>8.12</td> <td>0.61</td> </tr> <tr> <td>*CO<sub>2</sub> Emissions from Fertiliser</td> <td>3492.44</td> <td>0.43</td> <td>0.03</td> </tr> <tr> <td>**N<sub>2</sub>O Emissions from Fertiliser</td> <td>1564.37</td> <td>0.19</td> <td>0.01</td> </tr> <tr> <td>Fuel Consumption</td> <td>2273.13</td> <td>0.28</td> <td>0.02</td> </tr> <tr> <td>Peat Oxidation</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> </tbody> </table>						Own Crop				Emission sources	tCO <sub>2</sub> e	tCO <sub>2</sub> e/ha	tCO <sub>2</sub> e/FFB	Land Conversion	65362.60	8.12	0.61	*CO <sub>2</sub> Emissions from Fertiliser	3492.44	0.43	0.03	**N <sub>2</sub> O Emissions from Fertiliser	1564.37	0.19	0.01	Fuel Consumption	2273.13	0.28	0.02	Peat Oxidation	0.00	0.00	0.00												
Own Crop																																													
Emission sources	tCO <sub>2</sub> e	tCO <sub>2</sub> e/ha	tCO <sub>2</sub> e/FFB																																										
Land Conversion	65362.60	8.12	0.61																																										
*CO <sub>2</sub> Emissions from Fertiliser	3492.44	0.43	0.03																																										
**N <sub>2</sub> O Emissions from Fertiliser	1564.37	0.19	0.01																																										
Fuel Consumption	2273.13	0.28	0.02																																										
Peat Oxidation	0.00	0.00	0.00																																										

**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings																																															
			<table border="1"> <tr> <td colspan="4"><b>Sinks</b></td> </tr> <tr> <td>Crop Sequestration</td> <td>-53887.38</td> <td>-6.70</td> <td>-0.50</td> </tr> <tr> <td>Conservation Sequestration</td> <td>-22966.90</td> <td>-2.85</td> <td>-0.21</td> </tr> <tr> <td><b>Total</b></td> <td><b>-4161.74</b></td> <td><b>-0.52</b></td> <td><b>-0.04</b></td> </tr> <tr> <td colspan="4">Palm Oil Mill Effluent (POME) Treatment</td> </tr> <tr> <td colspan="2">Diverted to compost</td> <td colspan="2">0%</td> </tr> <tr> <td colspan="2">Diverted to anaerobic digestion</td> <td colspan="2">100%</td> </tr> <tr> <td colspan="4">Diverted to Anaerobic Digestion</td> </tr> <tr> <td colspan="2">Diverted to anaerobic pond</td> <td colspan="2">48.40%</td> </tr> <tr> <td colspan="2">Diverted to methane capture (flaring)</td> <td colspan="2">51.60%</td> </tr> <tr> <td colspan="2">Diverted to methane capture (electricity generation)</td> <td colspan="2">100.00%</td> </tr> </table>				<b>Sinks</b>				Crop Sequestration	-53887.38	-6.70	-0.50	Conservation Sequestration	-22966.90	-2.85	-0.21	<b>Total</b>	<b>-4161.74</b>	<b>-0.52</b>	<b>-0.04</b>	Palm Oil Mill Effluent (POME) Treatment				Diverted to compost		0%		Diverted to anaerobic digestion		100%		Diverted to Anaerobic Digestion				Diverted to anaerobic pond		48.40%		Diverted to methane capture (flaring)		51.60%		Diverted to methane capture (electricity generation)		100.00%	
<b>Sinks</b>																																																		
Crop Sequestration	-53887.38	-6.70	-0.50																																															
Conservation Sequestration	-22966.90	-2.85	-0.21																																															
<b>Total</b>	<b>-4161.74</b>	<b>-0.52</b>	<b>-0.04</b>																																															
Palm Oil Mill Effluent (POME) Treatment																																																		
Diverted to compost		0%																																																
Diverted to anaerobic digestion		100%																																																
Diverted to Anaerobic Digestion																																																		
Diverted to anaerobic pond		48.40%																																																
Diverted to methane capture (flaring)		51.60%																																																
Diverted to methane capture (electricity generation)		100.00%																																																
	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).	Yes	Auditor has verified through checking the <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , Google Maps, Estate Maps and also through site visit to the sampled estates areas. Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at Sri Kamusan 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.	No	The significant pollutants are identified and plans in the Waste and Pollution – Identification, Prevention, Mitigation and Improvement Plan. Control measure for Diesel/Lubricant/Hydraulic brings to field for machineries work was rectified and addressed accordingly as per evidence sighted at Sri Kamusan and Jebawang Estate However, Recurrence Major NCR DA 07/2021 was raised because of mitigation and prevention on workshop activity was not implemented and monitored again.																																															

**RSPO PUBLIC SUMMARY REPORT**

<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
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. In addition, Wilmar International Limited had a Green Stacking Policy under Item 4, Part 1, Chapter 3 of the Wilmar International Limited, Agriculture Manual & SOP for Oil Palm 3/2011. All 4 estates had complied to the policy as there was no evidence that fire had been used to prepare land for replanting in all estates. The was no replanting and replants in all 4 Estates at time of audit.
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	Yes	Sri Kamusan CU had established fire prevention and control measures for the areas under its direct management. In the mill there were water hydrants and valid fire extinguishers at the various operating stations. All 4 estates had valid fire extinguishers at the office, employee quarters, chemical & fertiliser stores, diesel skid tank, etc.
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	Yes	Sri Kamusan CU engages with adjacent stakeholders on fire prevention and control measures through stakeholder meetings. A training on fire drill carried out in Feb 2020, attended by stakeholders. Sri Kamusan 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 CU also engaged with adjacent to stakeholder on fire prevention and control measures by inviting them to join training and through stakeholder meetings.
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.	7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	Yes	Not Applicable as there was no new land clearing in the 4 Estates.
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	Yes	The High Conservation Value Assessment Report dated September 2010, had identified the HCV sites for each of all the six estates. A public consultation was held on June 2010 where 8 members of the local communities were represented in the meeting to discuss the findings in the report. An Action Plan for HCV Report was also prepared.
	7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor	Yes	

**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings
	and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.		HCV re-assessment removed and included some area has been done on 25-27 May 2015 by same assessor which was Malaysia Environmental Consultants Sdn Bhd, and recommended that the total HCV area was the same, however, some area has removed status as only conservation area.
	7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.	Yes	Areas within each of the estate were identified for protection of their high conservation values. Sites with external HCV1, HCV3 and HCV4 had also been identified. There were no RTE species found in Sri Kamusan CU during the assessments. Maps demarcating these HCV areas had also been prepared. The audit team had inspected the sites protected in the Hibumas 1 Estate, Hibumas 2 Estate, Sri Kamusan Estate, Jebawang Estate, Sapi Sugut Estate and Sekar Imej Estate. Noted that signage had been erected in all these HCV sites indicating the classes and that no activity was permitted in these areas. Sri Kamusan Estate has identified a total of 694.37 ha which are conservation area and riparian reserves, Sg. Melapi. The total area for HCV in the Sri Kamusan CU was 5,135.86 ha.  There was no new land clearing (in existing plantations or new plantings) in the CU.
	7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly	No	During last audit in 2020, it was found the integrated management plan was not developed in consultation with relevant stakeholders and not consider any relevant wider landscape level considerations. During this recertification audit, it was found the “High Conservation Value (HCV) Monitoring & Action Plan (2015-2019)” was amended to “Review & Summary HCV Management and Action Plan (2019-2020)”. An effort has been made by the Sri Kamusan CU to identify, protect and/or enhance forest connectivity in CU including new project of “Sekar Imej Conservation Area project”. However, the amended action plan was not sufficient to comply with indicator 7.12.4. Sri Kamusan CU has identified significant stakeholders. i.e., HUTAN (NGO), Sabah Wildlife Department, SEARRP, Sabah Forestry Department (Forest Research Centre Department) and others. However, proper or official consultation with these stakeholders to review the management plan was not conducted. The HCV Management Plan was not developed without consultation with relevant stakeholders in adaptive to changes in HCVs plans. Corrective action plan from the last surveillance audit (2020) was not effectively implemented. Thus, Major NCR MZK06/2020 was re-issued (recurrence) to Major NCR KN03/2021.



**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings
	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	Not applicable since there was no new land clearing in Sri Kamusan CU
	7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	Yes	All rare, threatened or endangered (RTE) species are protected, even though they are not identified in an HCV assessment in 2010. A programme to regularly educate the workforce about the status of RTE species was 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.

**RSPO PUBLIC SUMMARY REPORT**

Clause	Indicators	Comply Yes/No	Findings
	<p>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.</p>	<p>Yes</p>	<p>Records on monthly monitoring was verified during the audit. The HCV monitoring records using 'Borang Monitoring HCV Sabah' for month of February and January 2021 was sighted. The monitoring of HCV has been conducted at Sri Kamusan Estate, Hibumas 1, Hibumas 2 and Sekar Imej Estate. The outcomes of the HCV monitoring not fed back into the management plan as raised in Major NCR KN03/2021 against Indicator 7.12.4.</p> <p>Observed that signage had been erected at each estate to ban hunting. The entrances to each estate had gates and guarded by the security staffs. Regular patrols had been conducted and reported on the protection of these HCV sites. The staff and workers were also consulted on this and they were aware of the responsibility to protect endangered, rare and threatened species of forest flora and fauna in their areas. There were also posters put up at all estates offices.</p>
	<p>7.12.8 (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p>	<p>N/A</p>	<p>Not applicable since there was no new land clearing</p>

**RSPO PUBLIC SUMMARY REPORT**

**RSPO Certifications Systems for P&C and RISS, Nov 2020**

Clause	Indicators		Comply Yes/No	Findings
<p>5.5.2 Time-bound plan</p> <p>A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.</p>	(a)	As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	Yes	Details are available as per the following attachments relating to Time Bound Plan of Wilmar International Plantation as at January 2021. 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 updated as at January 2021
	(c)	Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);	Yes	Details of the Time Bound Plan described as per attachment 6 updated as at January 2021

**RSPO PUBLIC SUMMARY REPORT**

	(d)	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.	Yes	Details of the Time Bound Plan described as per attachment 6 updated as at January 2021
--	-----	--	-----	---

**RSPO PUBLIC SUMMARY REPORT**

<p>5.5.3 Requirements for uncertified management units:</p>	<p>(a)</p>	<p>No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.12. Any new plantings since 1<sup>st</sup> January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;</p>	<p>Yes</p>	<p>Wilmar International Limited (WIL) complied to all the requirements. There was no new planting since 1<sup>st</sup> January 2010 within the properties in WIL. The internal audit assessment report has been carried out of certification system for units of the following i.e.</p> <ul style="list-style-type: none"> <li>a) Indonesia Units</li> <li>b) Arica Units</li> <li>c) Malaysia Units</li> </ul> <p>The Assessment of compliance to RSPO Partial Certification Requirements has been carried out for clause 5.5.3 (e)-(h) of certification system for units such as:</p> <p><u>Indonesia Units</u></p> <ul style="list-style-type: none"> <li>- Pt. Agrindo Indah Perkasa on June 2018</li> <li>- Ksu Mutiara Bosa Sikilang on June 2018</li> <li>- Kud Damai Sejahtera on June 2018</li> <li>- Kud Kapar on June 2018</li> <li>- Koperasi Karya Makmur Pahirangan on February 2019</li> <li>- Koperasi Mamur Sejahtera on January 2019</li> <li>- Kud Permata Sawit Maligi on June 2018</li> <li>- Kud Rantau Pasaman Sasak on June 2018</li> <li>- Pt. Buluh Cawang Plantation on June 2018</li> <li>- Pt. Daya Landak Plantation on June 2018</li> <li>- Pt. Indoresin Putra Mandiri on June 2018</li> <li>- Pt. Putra Indotropical on June 2018</li> <li>- Pt. Pratama Prosentindo on June 2018</li> <li>- Pt. Agronusa Investama – PAHAUMAN on June 2018</li> <li>- Pt. Sarana Titian Permata Pom 2 on January 2019</li> <li>- Koperasi Tuah Jubata on February 2019</li> </ul> <p><u>Africa Units</u></p> <ul style="list-style-type: none"> <li>- Biase Plantation Limited (BPL) on February 2019</li> <li>- Eyop Industries Limited (EIL) on february 2019</li> </ul> <p><u>Malaysia Units</u></p> <ul style="list-style-type: none"> <li>- Jebawang Sdn Bhd – Laba Utama on April 2019</li> <li>- Suburmas Plantation Sdn Bhd on April 2019</li> </ul> <p>Evidences &amp; 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</p>
---	------------	--	------------	--

**RSPO PUBLIC SUMMARY REPORT**

				<p>compensation, SOP calculating and distributing fair compensation, etc were concluded adequate in the report for all uncertified management units.</p>
	(b)	<p>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&amp;C criteria 4.4, 4.5, 4.6, 4.7 and 4.8;</p>	<p>Yes</p>	<p>There was no report or issues raised in relation to land conflicts except for the land conflict at Hibumas 2 Estate, both parties have agreed to conduct inventory survey and marked estate boundary in order to confirm estate boundary with Kg. Banang. GPS Department from Wilmar had conducted survey at the encroached area from 22 January 2016 to June 2016. Hibumas 2 Estate still waiting for the map from EMU/GPS to indicate the encroached area. During this Audit in 2019, Auditor also verified the map Survey on June 2016 and the land survey/ title still the same which was belong to Hibumas 2 Estate and auditor also want to verify the land survey/ title from villagers, but unable to met them due to some of them going to work and some of them were going to town.</p> <p>During this audit in 2021, auditor has verified that Hibumas 2 and Jebawang Estate management has conducted a meeting with representative from Kg Banang on dated 29/3/19. The updated issue is the villagers ask to expand the Land for new generation and regarding the 487 acre the land was not all belonging to Hibumas 2, the land also include the IJM plantation which is 15 acres from their land title and management need to discuss with them. Auditor also goes to the village to meet the villagers, and Mr Nunun bin Ajib has confirmed the info. There is also 2 new issue of land claim first by Mr Gimba from Kg Tapat claimed the 5 acres land which is belong to Hibumas 2. And Mr Gimba also already apply and report to the Land Department, Beluran and currently waiting for the result which is expected in the middle of April 2020 as confirmed by the Mr Kendy C. Jeriah (Beluran Land Department Officer). The last one is claimed by Mrs Rinah Doing of Kampung Sungai-Sungai which is request for Land Surveyor for the site location and from Hibumas 2 as per letter dated 3/12/18 and support by Datuk James Ratib (YB Sugut) dated 4/1/19 and received by the management on date 22/1/19. Management currently waiting from Land Department of Kota Kinabalu to answer the issue.</p> <p>There were no issues on customary or user rights at Sapi Sugut, Sekar Imej and Jebawang Estate during this audit and verified by auditor during interview with Head of Village Representative of Kg. Tapat, Kg. Sungai-Sungai, Kg. Dampiron, Kg .Kaibotan and Kg. Menonood.</p>

**RSPO PUBLIC SUMMARY REPORT**

	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2;	Yes	There was 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)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 5.5.3 (a) – (d) above by the audit team based on self- declarations only by the company,	Yes	<p>Wilmar International Limited (WIL) complied to all the requirement. There was no new planting within the properties in WIL. The Assessment of compliance to RSPO Partial Certification Requirements has has been carried out for clause 5.5.3 (a)-(d) of certification system for units of the following i.e.</p> <ul style="list-style-type: none"> <li>d) Indonesia Units</li> <li>e) Africa Units</li> <li>f) Malaysia Units</li> </ul>
		with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:		
		<ul style="list-style-type: none"> <li>• A positive assurance statement is made, based upon self-assessment (i.e., internal audit) by organization. This would require evidence of the self-assessment against each requirement;</li> </ul>		There was no non-compliance found for all requirements during this audit.
	<ul style="list-style-type: none"> <li>• Targeted stakeholder consultation, including consultation with the relevant</li> </ul>			

**RSPO PUBLIC SUMMARY REPORT**

		NGO's will be carried out by the audit team.		
		<ul style="list-style-type: none"> <li>• Desktop study e.g., web check on relevant complaints</li> </ul>		
		<ul style="list-style-type: none"> <li>• If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.</li> </ul>		
	(f)	For requirements 5.5.3 (a)-(d) above, the classification of critical and non-critical is as stated in the RSPO P&C. If a non-compliance against a critical indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless it is actively addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be available.		
	(g)	Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these Certification Systems.		
5.6.6 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		No additional indicators	Yes	It has been verified that the land titles were for planting either oil palm or agricultural crops for economic value. It has been confirmed that Wilmar International Limited – Sri Kamusan Certification Unit has the right to use the land which was legitimately owned by their company. Evidence of legal ownership of the land including history of land tenure was verified during this audit. Each estate was provided with legal use of the land through a Country Lease signed by the Director of Lands and Surveys of Sabah following the payment of premium. It was also confirmed that there was no history of customary land tenure, recognised Native Customary Right (NCR) land. There was based on interview with village Representative of



**RSPO PUBLIC SUMMARY REPORT**

<p>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>The CB shall have a mechanism in place to identify the interested parties and ensure a represented samples size of the interested parties are consulted in each audit.</p> <p>The CB shall keep track which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle.</p>				<p>Kg. Tapat, Kg. Sungai-Sungai, Kg. Dampiron, Kg. Kaibotan, and Kg. Menonood.</p>
---	--	--	--	--

**RSPO PUBLIC SUMMARY REPORT**

**ATTACHMENT 4**

**DETAILS OF NON-CONFORMITIES AND CORRECTIVE ACTIONS TAKEN DURING RECERTIFICATION AUDIT (2021)**

No	P & C Indicator	Specification Major/Minor	Detail Non-conformances	Root Cause & Corrective Action Taken by the CU	Verification Statement by Auditors
1.	Indicator 2.2.2  RAR01/ 2021	Major (upgraded)	<p>Requirement: Indicator 2.2.2 - All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>Finding: Contractors are not able to demonstrate compliance with applicable legal requirements.</p> <p>Objective evidence: Audit found two contractors of FFB transporter at Hibumas 1 Estate and at Sapi Sugut Estate were not able to demonstrate compliance with legal requirements by not paying their workers KWSP, SOCSO or insurance</p>	<p>Result of investigation and determination of root cause</p> <ol style="list-style-type: none"> <li>1) We have found out that the contractor had wrongly making false submission to our office, where they claiming that they have paid their workers SOCSO and KWSP.</li> <li>2) The estate fails to conduct checking of the submission where contractor workers frequently changing their workers due to high turnover.</li> <li>3) The internal audit procedure does not include contractor in the internal audit process.</li> </ol> <p>Correction (if applicable) and corrective action plan including completion date</p> <ol style="list-style-type: none"> <li>1) Contractor purchased insurance policy for their worker and where applicable the contractor to submit the prove of SOCSO or KWSP contribution.</li> <li>2) The contractor was issued a reminder for failing to submit true copy of the SOCSO, KWSP or Insurance contribution.</li> <li>3) Contractor to submit to estate office once in every 3-month</li> </ol>	<p>Evidences below were verified</p> <ol style="list-style-type: none"> <li>1) A memo or letter to “Surat Pematuhan” regarding to compliance of Safety, Health, Environmental and workers right. The “Surat Pematuhan” letter was signed both the contractor’s workers representative and owner of the company.</li> <li>2) Screen shot of phone showed EPF appointment 2<sup>nd</sup> was cancelled due to COVID-19 Pandemic, MCO 3.0</li> <li>3) Group Personal Accident by Tokio Marine Insurans (Malaysia) Berhad and Foreign Workers Personal Accident Policy by Lonpac Insurance Berhad for contractors workers.</li> <li>4) Revised Internal audit procedure by including contractor in the auditing process as stated in clause2.0 – added “Contractors who do works and reside in the plantations and POMs are also included in the scope of audit” and clause 6.4.2 – added “The site conditions including contractors work sites, workshops, operations and their housing</li> <li>5) SOCSO contribution evident for sampled worker.</li> </ol> <p>Status: Closed with condition</p>

**RSPO PUBLIC SUMMARY REPORT**

				<p>statement of SOCSO/KWSP and Insurance contribution.</p> <p>4) Revised Internal audit procedure to include contractor in the auditing process.</p> <p>Corrected corrective action plan received on 25 June 2021</p> <p>1) Other contractors working in other estate in the certification unit was also required to submit their contributions and insurance policy</p>	
2.	<p>Indicator 3.7.3</p> <p>RAR02/2021</p>	Minor	<p>Requirement: Indicator 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.</p> <p>Finding: Training was not provided to personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS).</p> <p>Objective evidence: Training record for employees (staff &amp; weighbridge clerk) carried out the tasks critical to the effective implementation of the Supply Chain Certification Standard at Sri Kamusan FFB Collection Center were not available.</p>	<p>Result of investigation and determination of root cause</p> <p>1) The newly recruited personnel operate the weighbridge was not trained in the supply chain SOP before allowed to work as the training was scheduled in June 2021.</p> <p>2) The annual training programme does not include SCCS training for newly recruited weighbridge clerk.</p> <p>Correction (if applicable) and corrective action plan including completion date</p> <p>1) The newly recruited weighbridge clerk was conducted in 20 May 2020. The training includes SOP on handling RSPO SCCS, Certified and Non-Certified product.</p> <p>2) The SCCS training is included in the yearly training programme and all new weighbridge clerk will be trained before resumed work.</p>	<p>The corrective action plan and evidences for NCR received on 6 June 2021 was reviewed from 7-14 June 2021 by auditors.</p> <p>1) Training on RSPO SCCS was conducted on 20 May 2021. The pictorial report and attendance list of participant, with 2 clerks, 2 weighbridge clerks, and 2 staff attending the training.</p> <p>2) Training evaluation has been made on 3 June 2021 to gain the understanding of the participants. Result of the evaluation was reviewed by auditor.</p> <p>3) The SCCS training was updated in the year 2021 training program dated 1.6.2021 (item no.13)</p> <p>Status: Accepted</p> <p>The effectiveness of the action taken to be verified during the next audit</p>

**RSPO PUBLIC SUMMARY REPORT**

3.	<p>Indicator 6.3.2</p> <p>RAR03/2021</p>	<p>Minor</p>	<p>Requirement: Indicator 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> <p>Finding: Workers representatives from social and welfare committee was not available and not freely elected.</p> <p>Objective evidence:</p> <ol style="list-style-type: none"> <li>1. Audit at Sri Kamusan Estate found workers representatives for Workers' Welfare and Social Committees have been elected by Estate management.</li> <li>2. There was no worker representative from contractor workers at Sapi Sugut Estate and Jebawang Estate</li> </ol>	<p>Result of investigation and determination of root cause</p> <ol style="list-style-type: none"> <li>1) The election for workers representative was overdue and resigned workers representative was appointed directly by the Management.</li> <li>2) The “SOP Penubuhan Jawatankuasa Pekerja” was not mentioned for the requirement of electing representative from contractors’ workers.</li> </ol> <p>Correction (if applicable) and corrective action plan including completion date</p> <ol style="list-style-type: none"> <li>1) New election electing for electing estate workers and contractor representative was conducted for whole Sugut Region Estate.</li> <li>2) The “SOP Penubuhan Jawatankuasa Pekerja” was reviewed and amended to include representative from contractor’s workers.</li> </ol> <p><i>Correction and Corrective action plan were accepted</i></p>	<p>The corrective action plan and evidences for NCR received on 6 June 2021 was reviewed from 7-14 June 2021 by auditors.</p> <ol style="list-style-type: none"> <li>1. New election estate workers and contractor representative was conducted for whole Sugut Region Estate.</li> <li>2. The “SOP Penubuhan Jawatankuasa Pekerja” no. dokumen: SOP/SPE/PPB(2)/031 was reviewed and amended on 17 May 2021 to include representative from contractor’s workers.</li> </ol> <p>Hibumas 1 Estate</p> <ol style="list-style-type: none"> <li>1. Hari Penamaan Calon bagi Pemilihan Wakil Pekerja Kali ke-3 on 29 May 2021. Briefing was conducted during Muster Ground on 29 May 2021</li> <li>2. Hari Pembuangan Undi Pemilihan Wakil Pekerja Kali ke-3 on 1 June 2021</li> <li>3. Pictures on Suasana Semasa Sesi Mengundi Dijalankan dated 26/5/2021 and Suasana Semasa Pengiraan Undi Dijalankan dated 27/5/2021</li> <li>4. Keputusan Undian Bagi Tahun 2021 dated 27 May 2021</li> <li>5. Surat Lantikan Ahli Jawatankuasa Kebajikan dan Social Pekerjaan dated 27 May 2021</li> <li>6. The organizational chart were prepared for JKPP, JWKK, and JKSP</li> </ol> <p>Hibumas 2 and Jebawang Estate</p> <ol style="list-style-type: none"> <li>1. Undian untuk Pemilihan Wakil Pekerja Hibumas 2 &amp; Jebawang – Jawatankuasa Kebajikan &amp; Social Pekerja was conducted on 25 May 2021. This includes pictures of each</li> </ol>
----	--	--------------	---	--	---

**RSPO PUBLIC SUMMARY REPORT**

					<p>candidates and pictures on during election process.</p> <ol style="list-style-type: none"> <li>2. Internal memo of appointment Surat Lantikan Ahli Jawatankuasa Kebajikan dan Social Pekerjaan dated 25 May 2021. This includes acknowledgement from each representatives of the workers. The representative from contactor were recorded in page 11 of the Memo</li> <li>3. The organizational chart for JKKP, JWKK, and JKSP</li> </ol> <p>Sekar Imej &amp; Sapi Sugut Estate</p> <ol style="list-style-type: none"> <li>1. The organizational chart for JKKP, JWKK, and JKSP</li> <li>2. Keputusan Undian bagi tahun 2021 dated 26 May 2021</li> <li>3. Hari Penamaan Calon Pemilihan Wakil Pekerja kali ke-3 dated 21 May 2021 and Hari Pembuangan Undi Pemilihan Wakil Pekerja kali ke-3 dated 26 May 2021</li> <li>4. Pengumuman Penamaan Calon and responsible of workers representative was announced on 20 May 2021 during the Muster Ground</li> <li>5. Pictures on suasana semasa sesi mengundi dijalankan dan pengiraan undi dated 26/5/2021</li> <li>6. Internal memo of appointment Surat Lantikan Ahli Jawatankuasa Kebajikan dan Social Pekerjaan dated 27 May 2021. This includes acknowledgement from each representatives of the workers and verification from estate manager. The representative from contactor were recorded in page 2 and page 4 of the Memo</li> </ol>
--	--	--	--	--	--

**RSPO PUBLIC SUMMARY REPORT**

					<p>Sri Kamusan Estate</p> <ol style="list-style-type: none"> <li>1. Pictures during election and counting of votes dated 6/5/2021</li> <li>2. Organisational chart Jawatankuasa Kebajikan dan Sosial Pekerja, list of result of election for each representative (verified by Sr. Asst. Manager)</li> <li>3. Penerimaan surat lantikan includes pictures of representative and acknowledgement from each workers representative</li> </ol> <p>Status: Accepted</p> <p>The effectiveness of the action taken to be verified during the next audit</p>
4.	<p>Indicator 2.1.3</p> <p>KN01/2021</p>	<p>Major (upgraded)</p>	<p>Requirement: Indicator 2.1.3 - Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>Finding: Legal or authorised boundaries were not clearly demarcated and visibly maintained. Corrective action plan was not effectively implemented. Thus, Minor NCR MZK02/2020 was upgraded to Major NCR KN01/2021</p> <p>Objective evidence:</p> <ol style="list-style-type: none"> <li>1. Visit to legal boundaries between Sri Kamusan Estate (Block 5) with Kg. Tangkangit, found only one red painted pole and was not clearly demarcated and not maintained along the estate boundaries</li> <li>2. Visit to legal boundaries between Hibumas 1 Estate (Block 47) with</li> </ol>	<p>Result of investigation and determination of root cause</p> <ol style="list-style-type: none"> <li>1) The role of inspection and making sure of boundary has been marked and maintained was not clearly spelled out in the current "Boundary Demarcation &amp; Maintenance SOP".</li> <li>2) Only part of the Estate boundary was marked by the estate and it was reported as completed in the monthly report.</li> <li>3) Knowledge and skill are lacking among the lower rank staffs in demarcating and maintenance of estate boundary</li> </ol> <p>Correction (if applicable) and corrective action plan including completion date</p> <ol style="list-style-type: none"> <li>1) The "Boundary Demarcation &amp; Maintenance SOP" had been revised in which to include the</li> </ol>	<p>The corrective action plan and evidence for Major NCRs received on 6 June 2021 was reviewed from 7-14 June 2021 by auditors.</p> <p>Evidence below were verified</p> <ol style="list-style-type: none"> <li>1. Boundary Demarcation &amp; Maintenance PBB/SOP/(02)/0166 dated updated on 18/5/2021 by;             <ol style="list-style-type: none"> <li>a. adding the responsibility of estate PIC to made boundary maintenance report monthly (clause 10), and</li> <li>b. including the Sustainable Department to conduct audit for boundary maintenance and marking during internal audit/inspection (clause 11)</li> </ol> </li> </ol> <p>Hibumas 1 Estate</p> <ol style="list-style-type: none"> <li>1. Boundary Marking Progress Hibumas1 report dated 19 – 26 May 2021, at Parcel 14/17.</li> </ol>

**RSPO PUBLIC SUMMARY REPORT**

			<p>IJM Plantation, and Hibumas 1 Estate (Block 23) with IDC found the boundary paint were faded and not maintained, even the estate staff were unable to find the boundaries.</p> <p>3. Visit to Jebawang Estate (Block 10) adjacent with IJM Plantation was not found.</p>	<p>responsibility of Estate PICs for reporting and making sure the boundary is maintained and marked. The Sustainability Department also responsible to conduct inspection and audit.</p> <p>2) Full boundary marking and maintenance was conducted for the whole Sugut estates.</p> <p>3) The "Boundary Demarcation &amp; Maintenance SOP" training was conducted for the whole estates' PICs and staff</p>	<p>2. Pictures of progress painting the boundaries (block 023 – 028),</p> <p>3. Boundary Map Parcel 14/17,</p> <p>4. Pictures of progress painting the boundaries (block 011 – 022) of parcel 13,</p> <p>5. Boundary Map Parcel 13,</p> <p>6. Pictures of progress painting the boundaries (block 001 – 008), Parcel 12 dated 17-28/5/2021</p> <p>7. Boundary Map Parcel 12,</p> <p>8. Pictures of progress painting the boundaries Parcel 19 – Parcel 20 dated 17-24/5/2021</p> <p>9. Boundary Map Parcel 19 &amp; 20,</p> <p>10. Boundary Marking at Parcel 21 and 10 from 17- 27/05/2021</p> <p>11. Boundary Map Parcel 10 and Parcel 21</p> <p>Hibumas 2 and Jebawang Estate</p> <p>1. Boundary Marking progress dated 15-29 May 2021</p> <p>2. Pictures of progress painting the boundaries at Hibumas 2</p> <p>a. Parcel 6, Block 041, (Central),</p> <p>b. adjacent with IJM Plantation (block 040-045),</p> <p>c. pegging work at block 047,</p> <p>d. Block 017-021</p> <p>e. Map shows boundary mapping progress that was done for Parcel 6, Hibumas 2 (Central Division) from 15th to 29th May 2021.</p> <p>3. Pictures of progress painting the boundaries from 15 – 29/5/2021 at Hibumas 2</p> <p>a. Parcel 2-3, Block 010, (Petagas Division)</p> <p>b. Adjacent with IJM Plantation at Block 011-007</p> <p>c. Map shows boundary mapping progress that was done for Parcel 2 - 3, Hibumas</p>
--	--	--	---	--	---

**RSPO PUBLIC SUMMARY REPORT**

					<p>2 (Petagas Division) from 15 to 29 May 2021.</p> <p>4. Pictures of progress painting the boundaries from 15 – 29/5/2021 at Hibumas 2</p> <p>a. Parcel 7, Block 068 - 066, and pegging work at (Sungai-sungai Division)</p> <p>b. Map shows boundary mapping progress that was done for Parcel 2 - 3, Hibumas 2 (Petagas Division) from 17 - 29 May 2021</p> <p>5. Pictures of progress painting the boundaries from 17 – 29 May 2021 at Jebawang</p> <p>a. Pictures of boundary and peg marking at Laba Utama starting from block 008 - 001.</p> <p>b. Boundary Marking at Jebawang starting from block 001 to block 019.</p> <p>c. Signboard of sempadan project installation with IJM was also been done at Jebawang.</p> <p>d. Map shows boundary mapping progress that was done for Jebawang starting from 17 - 29 May 2021.</p> <p>e. Map shows the overall completion of boundary marking progress that has been done both for Hibumas 2 and Jebawang Estate.</p> <p>6. Pictures of progress painting the boundaries at Sekar Imej &amp; Sapi Sugut Estate were reviewed as below;</p> <p>a. Sekar Imej Div.1 – BLOK 001 / Sempadan Boustead Sungai-Sungai 2 on 26 May 2021</p> <p>b. Sekar Imej Div.1 – BLOK 003 / Sempadan Boustead Sungai-Sungai 2 on 25 May 2021</p> <p>c. Sekar Imej Div.1 – BLOK 005 / Sempadan Kampung Teliduson on 22-24 May 2021</p>
--	--	--	--	--	--



**RSPO PUBLIC SUMMARY REPORT**

					<p>d. Sekar Imej Div.1 – BLOK 004 / Sempadan Boustead Sungai-Sungai 2 on 20-21/5/2021</p> <p>e. Sekar Imej Div.1 – BLOK 002 / Sempadan Boustead Sungai-Sungai 2 on 18-19/5/2021</p> <p>f. Sekar Imej Div.C – BLOK 012 / BLOK 013 &amp; BLOK 014 Sempadan Boustead Sungai-Sungai 2 / Kampung Mononood on 21-22 May 2021</p> <p>g. Sekar Imej Div.D – BLOK 015 &amp; BLOK 016 on 24-26 May 2021</p> <p>h. Sekar Imej Div.C – BLOK 018 &amp; BLOK 020 on 17-20 May 2021</p> <p>i. Sekar Imej Div.E – BLOK 028 &amp; BLOK 030 on 27-28 May 2021</p> <p>j. Sekar Imej Div.E – BLOK 026 on 28 May 2021</p> <p>k. Sekar Imej Div.2 – BLOK 006 on 18-21 May 2021</p> <p>l. Sekar Imej Div.2 – BLOK 009 / BLOK 010 on 18-21 May 2021</p> <p>m. Aktif Kukuh (Sapi Sugut Div.B) – BLOK 022 on 10-17 May 2021</p> <p>n. Aktif Kukuh (Sapi Sugut Div.B) – BLOK 017 on 10-12 May 2021</p> <p>o. Koperasi Land ( Sapi Sugut Div.A) on 10-22 May 2021</p> <p>p. Map shows the overall completion of boundary marking progress that has been done for Sekar Imej Div.1, Div. C, Div. E, Div. D, Div.5, Div.2, Sapi Sugut Div. B, and Sapi Sugut Div. A.</p> <p>7. Pictures of progress painting the boundaries at Sri Kamusan Estate were reviewed as below;</p> <p>a. Division 1, Block 002 at 24/05/2021</p>
--	--	--	--	--	---

**RSPO PUBLIC SUMMARY REPORT**

					<ul style="list-style-type: none"> <li>b. Map shows the points where boundary marking was progressively in work from block 002 to block 005, Sri Kamusan.</li> <li>c. Division 1, Block 005 (Adjacent to Kg. Tangkangit) 20 - 27/05/2021</li> <li>d. Map shows the point where boundary marking and signboard of sempadan projek and Kg. Tangkangit was erected at Block 005. The estate boundary is adjacent to Kg. Tangkangit.</li> <li>e. Division 3, Block 024 – 038 on 21-24.05.2021</li> <li>f. Map shows the boundary that was marked from block 024 – 038, Sri Kamusan.</li> <li>g. Boundary from Block 44 - 53 on 21-24.05.2021</li> <li>h. Map shows the boundary that was marked from block 044 - 053, Sri Kamusan.</li> <li>i. Boundary Block 054 - 055, (Hibumas 1/Sri Kamusan) Block 032 - 029 on 26 - 29.05.2021</li> <li>j. Map shows the boundary that was marked from block 054 - 055, Sri Kamusan. Block 032 – 029, Hibumas 1/Sri Kamusan (HM1/SK)</li> <li>k. Map of Summary of Boundary Marking Sri Kamusan</li> </ul> <ul style="list-style-type: none"> <li>8. Training report – Boundary Marking &amp; Maintenance dated 26 May 2021 conducted at Sri Kamusan Estate by Group Manager, Sustainability. Attendance of 26 participant (field conductor, and TFA)</li> <li>9. Training report – Boundary Marking &amp; Maintenance dated 26 May 2021 conducted at Hibumas 1 Estate by Sustainability Manager. Attendance of 16 participant (SFC and clerk)</li> </ul>
--	--	--	--	--	--

**RSPO PUBLIC SUMMARY REPORT**

					<p>10. Training report – Boundary Marking &amp; Maintenance dated 26 May 2021 conducted at Jebawang and Hibumas 2 Estate by Group Manager. Attendance of 23 participants.</p> <p>11. Training report – Boundary Marking &amp; Maintenance dated 26 May 2021 conducted at Sekar Imej and Sapi Sugut Estate by Sr. Asst. Manager. Attendance of 14 participants.</p> <p>Status: Closed with condition</p>
5.	<p>Indicator 3.4.2</p> <p>KN02/2021</p>	Minor	<p>Requirement: Indicator 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.</p> <p>Finding: The current affected surrounding stakeholders was not included into the Social Impact Assessment (SIA)</p> <p>Objective evidence: Audit found the Sri Kamusan CU has identified new affected stakeholders of surrounding local indigenous communities. This information was collected during stakeholders meeting, and registered smallholders for FFB suppliers, from time to time. It was not updated into the SIA.</p>	<p>Result of investigation and determination of root cause</p> <p>1) The SIA assessment was planned to be conducted this year but was postponed due to current COVID-19 pandemic.</p> <p>Correction (if applicable) and corrective action plan including completion date</p> <p>1) Budget for SIA review assessment has been allocated for the whole estate.</p> <p>2) An internal assessment will be conducted and to include the new identified local communities' settlement. Completion date: 1<sup>st</sup> half of Jan 2022.</p>	<p>The corrective action plan and evidences for Major NCRs received on 6 June 2021 was reviewed from 7-14 June 2021 by auditors.</p> <p>Evidences below were verified</p> <p>1. Budget 2021 Overhead Assumptions (GM Ptn) – 14.08.20</p> <p>Status: Accepted</p> <p>The effectiveness of the action taken to be verified during the next audit</p>
6.	<p>Indicator 7.12.4 (C)</p> <p>KN03/2021</p>	Major (recurrence)	<p>Requirement: Indicator 7.12.4 © – 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,</p>	<p>Result of investigation and determination of root cause</p> <p>1) The HCV Management Plan was not sufficiently updated to include other activities that was conducted.</p>	<p>The corrective action plan and evidences for Major NCRs received on 6 June 2021 was reviewed from 7-14 June 2021 by auditors.</p> <p>Evidences below were verified</p> <p>1. Conservation &amp; HCV Record for Sugut Region</p>

**RSPO PUBLIC SUMMARY REPORT**

			<p>HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>Finding: The HCV Management Plan was not developed without consultation with relevant stakeholders in adaptive to changes in HCVs plans. Corrective action plan from the last surveillance audit (2020) was not effectively implemented. Thus, Major NCR MZK06/2020 was re-issued to Major NCR KN03/2021</p> <p>Objective evidence:          1. During recertification audit, it was found the “High Conservation Value (HCV) Monitoring &amp; Action Plan (2015-2019)” was amended to “Review &amp; Summary HCV Management and Action Plan (2019-2020)”. An effort has been made by the Sri Kamusan CU to identify, protect and/or enhance forest connectivity in CU including new project of “Sekar Imej Conservation Area project”. However, the amended action plan was not sufficient to comply with indicator 7.12.4.</p>	<p>2) Guidance on placement of HCV signage was not available for estate to refer.          3) The consultation was not conducted due to current COVID-19 situation, hampering face to face meetings</p> <p>Correction (if applicable) and corrective action plan including completion date</p> <p>1) Revision of the HCV Management plan was completed including planned and report of activities conducted.          2) Map of the HCV signages placement was produced to guide the estate for placement.          3) Erecting the HCV signages was completed in accordance to guidance given.          4) A virtual official consultation was held with identified stakeholder.          5) Refresher training for HCV monitoring and reporting was conducted for all person in-charge.</p> <p><i>Correction and corrective action plan were accepted</i></p>	<p>2. HCV Management and Action Plan Hibumas 1 Estate (2021-2025)          3. HCV Management and Action Plan Jebawang, Hibumas 2 and Laba Utama Estate (revised May 2021)          4. HCV Management and Action Plan Hibumas 1 Estate (2021-2025) (revised May 2021)          5. HCV Management and Action Plan Sekar Estate (2021-2025) (revised May 2021)          6. HCV Management and Action Plan Sri Kamusan Estate (2021-2025) (revised May 2021)          7. RSPO 7.12.4 Training Report – Implementation of new HCV monitoring form and application of Avenza maps for HCV Monitoring on 20 May 2021          8. Conservation Training: HCV Refresher training conducted on 10 March 2021          9. Minutes of Meeting for Conservation Stakeholders dated 25 May 2021 which was attended by:</p> <ol style="list-style-type: none"> <li>1. Sabah Wildlife Department</li> <li>2. Sabah Forestry Department</li> <li>3. PONGO Alliance – Kinabatangan Project</li> <li>4. HUTAN – Kinabatangan Orang Utan Conservation Programme</li> <li>5. Earthworm Foundation</li> <li>6. Borneon Sun Bear Conservation Centre (BSBCC)</li> <li>7. SEARRP</li> <li>8. UMS</li> <li>9. Neighbouring Estate – IJM</li> <li>10. Sepilok Orang Utan Rehabilitation Centre</li> <li>11. Representative of CU</li> </ol> <p>Summary HCV Monitoring Findings in 20201 – 2021 Sugut Region. The report contains a</p>
--	--	--	--	---	--

**RSPO PUBLIC SUMMARY REPORT**

			<p>2. Visit to HCV site at Sri Kamusan Estate (Block 55), Hibumas 1 (Parcel 21), Jebawang Estate (Block 10) found the signage was not sufficient, as required in Sri Kamusan's HCV Management and Action Plan (2019-2020).</p> <p>3. Sri Kamusan CU has identified significant stakeholders. i.e., HUTAN (NGO), Wildlife Department, SEARRP, Sabah Forestry Department (FRC) and others. However, proper or official consultation with these stakeholders to review the management plan was not conducted.</p>		<p>complete records and monitoring, including maps, pictures, location, and discussion on HCV findings to enhance monitoring system using Avenza Maps and improvements</p> <p>10. Report on Review &amp; Summary HCV Management &amp; Action Plan Year 2019-2021 (as May)</p> <p>HCV Boundary Marking</p> <ol style="list-style-type: none"> <li>1. HCV Signboard Records (undated) of Hibumas 1 Estate showed the location of each signboard erected in each Parcel of the Estate.</li> <li>2. HCV Signboard Records (undated) of Hibumas 2 and Jebawang Estate showed the location, Pictures and map of each signboard erected in the Estate.</li> <li>3. HCV Signboard Records (undated) of Sekar Imej &amp; Sapi Sugut Estate showed the location, dated of erected signboard, pictures before and after, and map of each signboard erected in the Estate.</li> <li>4. Signboard Placement &amp; Boundary Demarcation in Sugut Region Estate, Conservation Signboard Inventory dated 2 May 2021. The report showed overall location of signboard in the map</li> <li>5. 20/05/2021 Location : Division 3, Block 027 Peg was also erected at the HCV boundary at Block 027, Sri Kamusan.</li> <li>6. The map showed the location where HCV marking was progressively done at next to block 027 of Sri Kamusan</li> </ol>
--	--	--	--	--	---

**RSPO PUBLIC SUMMARY REPORT**

					<p>7. Photos shows the marking of HCV boundary. Peg was also erected at the HCV boundary at Block 002, Sri Kamusan.</p> <p>Status: Closed with condition</p>
7.	<p>Indicator 3.3.2</p> <p>STK01/2021</p>	Minor	<p>Requirement: Indicator 3.3.2 – A mechanism to check consistent implementation of procedures is in place</p> <p>Finding: Consistent implementation of procedures was not in place.</p> <p>Objective evidence: At time of visit, consistent implementation of procedures as per Wilmar International Limited 2011 Agriculture Manual &amp; SOP for Oil Palm were not implemented as per:</p> <p>3. Part 2: Upkeep Mature Oil Palm Chapter 6 – Item 2.2 Inter-row maintenance to eradicate the large numbers of VOPs and woody growths in Block 26 of Hibumas 1 Estate and in Block 5 of Jebawang Estate.</p> <p>4. Chapter 7 Item 9.2 to collect all loose fruits and harvested bunches in Block 26 of Hibumas 1 Estate and in Block 5 of Jebawang Estate</p>	<p>Result of investigation and determination of root cause</p> <ol style="list-style-type: none"> <li>1. The block mentioned was initially earmark for replanting next year whilst field maintenance was kept in bare minimum. The maintenance also way behind schedule due to labour shortages.</li> <li>2. The area mentioned has experience high crop but also having labour shortages.</li> </ol> <p>Correction (if applicable) and corrective action plan including completion date</p> <ol style="list-style-type: none"> <li>1) The area to be clean-up to eradicate the woody growth and VOPs.</li> <li>2) Loose fruit collection to be intensify in the said area with the help from other operating unit workers.</li> <li>3) The weeding operations schedule was revised in order for the field upkeep is up to date</li> </ol>	<p>The corrective action plan and evidences for Major NCRs received on 6 June 2021 was reviewed from 7-14 June 2021 by auditors.</p> <p>Evidences below were verified</p> <ol style="list-style-type: none"> <li>1. Laporan Kerja-Kerja Pembersihan Kawasan Ladang (Uprooting VOPs, Selective Weeding, Spraying, Loose Fruit Collection) has been conducted at Jebawang, Hibumas 1 (undated)</li> </ol> <p>The newly submitted letter (received by SIRIM QAS Int on 25 June 2021) where both parties signed the copy of the letters were reviewed by auditors as below;</p> <ol style="list-style-type: none"> <li>1. Circle Path Spray Schedule Sri Kamusan</li> <li>2. Selective Spray Sri Kamusan Schedule</li> <li>3. Selective Spray of Hibumas 1 Estate</li> <li>4. Selective Weeding of Hibumas 1 Estate</li> <li>5. Work Program Sapi Sugut</li> </ol> <p>Status: Accepted</p> <p>The effectiveness of the action taken to be verified during the next audit</p>
8.	<p>Indicator 7.2.2 (C)</p> <p>STK02/2021</p>	Major	<p>Requirement: Indicator 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.</p>	<p>Result of investigation and determination of root cause</p> <ol style="list-style-type: none"> <li>1. The present recording sheet and its imbedded formula has inadvertently altered.</li> </ol>	<p>The corrective action plan and evidences for Major NCRs received on 11 June 2021 was reviewed from 7-14 June 2021 by auditors.</p> <p>Evidences below were verified</p>

**RSPO PUBLIC SUMMARY REPORT**

			<p>Finding: The amount of active ingredients of pesticides applied per ha were not computed correctly.</p> <p>Objective evidence: At time of audit, it was noted that on Sri Kamusan Estate, Hibumas 1 Estate and Sapi Sugut Estate the amount of active ingredients of pesticides used were not maintained correctly.</p>	<p>2. There was no one to check the accuracy of the data submitted.</p> <p>Correction (if applicable) and corrective action plan including completion date</p> <ol style="list-style-type: none"> <li>1. The recording sheet was reviewed, enhanced and corrected by Sustainability Department.</li> <li>2. Recalculation of the recording was completed for the whole estate on 29 May 2021.</li> <li>3. A training on the reviewed and enhanced data sheet was conducted on 22 May 2021.</li> <li>4. A specific person being assigned to check the accuracy of the data.</li> </ol>	<ol style="list-style-type: none"> <li>1) Training on RSPO 7.2.2 – Standard Perekodan Bahan Kimia dan Pengiraan Active Ingredient (a.i.) / Hectare on 22 May 2021 was conducted at Terusan Estate dan Aplikasi ZOOM by Group Manager – Sustainability. Screen shot of Zoom meeting was verified by auditor</li> <li>2) Hibumas 1 A.i Pesticides Chemical Recording-2020</li> <li>3) a.i Pesticides Chemical Recording - Hibumas 2 – 2020</li> <li>4) A.i Pesticides Chemical Recording - Hibumas 2 – 2021</li> <li>5) A.i Pesticides Chemical Recording - Jebawang 2020</li> <li>6) A.i Pesticides Chemical Recording - Jebawang 2021</li> <li>7) CHEMICAL USAGE Sapi Sugut 21</li> <li>8) CHEMICAL USAGE Sapi Sugut 2020</li> <li>9) CHEMICAL USAGE Sekar Imej 21</li> <li>10) CHEMICAL USAGE Sekar Imej 2020</li> <li>11) Sri Kamusan A.i Pesticides Chemical Recording 2020</li> <li>12) Sri Kamusan A.i Pesticides Chemical Recording 2021</li> <li>13) Records of 2020 of Alion, Supremo, Supresate, Sodium, Kenlly, Embark, Kadet Blazer</li> <li>14) Records of 2021 of Alion, GP Surfactant, Kadet Blazer and Supresate</li> </ol> <p>Status: Closed with condition</p>
9.	Indicator 2.1.1 (C)  DA01/2021	Major (Recurrence)	<p>Requirement: Indicator 2.1.1 (C) – The unit of certification complies with applicable legal requirements.</p> <p>Finding: The unit of certification was not complied with Occupational Safety and Health (Notification of Accident, Dangerous Occurrence, Occupational</p>	<p>Result of investigation and determination of root cause</p> <p>The submission of JKPP 8 report was not done on time due to poor Internet connection and its submission was not monitored by the management.</p>	<p>The corrective action plan and evidences for Major NCRs received on 6 June 2021 was reviewed from 7-14 June 2021 by auditors.</p> <p>Evidences below were verified</p> <ol style="list-style-type: none"> <li>1. Pemberitahuan Tunjuk Sebab Kelewatan Melaporkan MYKKP Melalui Sistem MYKKP to DOSH Sandakan, dated 17 May 2021 from</li> </ol>

**RSPO PUBLIC SUMMARY REPORT**

			<p>Poisoning and Occupational Disease) Regulations 2004, refer Regulation 10 Records Subsection 3. Requires JKPP 8 shall be sent to DOSH before 31<sup>st</sup> January of the following year</p> <p>Objective evidence: Audit at Hibumas 1 Estate and Jebawang Estate found JKPP 8 Form for all accidents and dangerous occurrences which have occurred in year 2020 was send to DOSH via MyKKP System after 31 January 2021.</p>	<p>Correction (if applicable) and corrective action plan including completion date</p> <ol style="list-style-type: none"> <li>1) A letter of explanation for late submission of JKPP 8 report was send to DOSH on the 18<sup>th</sup> May 2021.</li> <li>2) Specific person was appointed on 20 May 2020 to monitor the process of any statutory reporting submission.</li> <li>3) The task and responsibility of the appointed PIC was stated in the appointment letter, these including for monitoring of submission is in time. The letter also indicated the timeline of each monitoring.</li> </ol>	<p>Hibumas 1, Jebawang, Hibumas 2. The letter was acknowledged by DOSH on 18 May 2021</p> <ol style="list-style-type: none"> <li>2. Appointment Letter of "Dilantik Sebagai Pegawai Yang Bertanggungjawab Memantau Pelaporan Wajib, Tamat Tempoh Lesen/Permit &amp; Mesyuarat" to PIC of Estate Sabah, Estate Sarawak and Mill Sabah &amp; Sarawak. Letter dated 20 May 2021 was verified by auditor.</li> <li>3. The letter contains other yearly reminder, e.g., CePSWaM, PCEM, Medical Surveillance, Audiometric test, and others</li> <li>4. The letter was accepted and acknowledged by the PIC on 24 May 2021.</li> </ol> <p>Status: Closed with condition</p>
10	<p>Indicator 3.2.1 (C)</p> <p>DA02/2021</p>	<p>Major (Recurrence)</p>	<p>Requirement: Indicator 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.</p> <p>Finding: The action plan for continuous improvement was not fully implemented, based on consideration of the main environmental impacts and opportunities of the unit of certification.</p> <p>Objective evidence: The action plan for continuous improvement at Hibumas 1 and Sri Kamusan Estates were not satisfactorily implemented. Corrective action plan during last surveillance 4 audit (DA10/2020) was not effectively</p>	<p>Result of investigation and determination of root cause</p> <ol style="list-style-type: none"> <li>1) The scope of current continuous improvement plan was inadequate where it is not covered the operations or activities conducted by the contractor.</li> <li>2) The scope of internal audit had not covered the contractor.</li> <li>3) The SOP for handling of scheduled waste is inadequately covered the activities conducted by the contractor.</li> <li>4) Training for contractor in handling scheduled waste was not conducted for contractor.</li> </ol> <p>Correction (if applicable) and corrective action plan including completion date</p>	<p>The corrective action plan and evidences for Major NCRs received on 6 June 2021 was reviewed from 7-14 June 2021 by auditors.</p> <p>Evidences below were verified</p> <ol style="list-style-type: none"> <li>1. Continuous Improvement Plan (CIP) was prepared by Sustainability Department (Sabah) for PPB Oil Palms Bhd was reviewed as 6<sup>th</sup> revision, dated 29 May 2021</li> <li>2. A memo or letter of "Surat Pematuhan" regarding to compliance of Safety, Health, Environmental and workers right from Hibumas 1 Sr. Asst. Manager was issued signed both the contractor's workers representative and owner of the company.</li> <li>3. Training on Schedule Waste and Domestic Waste provided.</li> </ol>



**RSPO PUBLIC SUMMARY REPORT**

			<p>implemented as the following activities/operation below:</p> <ol style="list-style-type: none"> <li>1) Wastes Management (Scheduled Wastes &amp; Recycling Wastes) at Sri Kamusan Estate, Contractor Workshop Block 11 Phase 1 and Hibumas 1 Estate, Contractor Workshop Block 24 Parcel 14 (7.3.1)</li> <li>2) Lubricant / Hydraulic Oil Spillage at Sri Kamusan Estate, Contractor Workshop Block 11 Phase 1 and Hibumas 1 Estate, Contractor Workshop Block 24 Parcel 14 (refer indicator 7.10.3)</li> </ol>	<ol style="list-style-type: none"> <li>1) The continuous improvement plan was amended and revised to include the operation/activities of contractor</li> <li>2) The scope of internal audit in the Internal Audit Procedure was amended to cover the operation/activities of contractor.</li> <li>3) The management had agreed that all schedule waste and small maintenance to be conducted in estate workshop.</li> <li>4) Training was conducted to all contractor for handling scheduled waste.</li> <li>5) The SOP on "Labeling, Handling, Storage of Scheduled Wastes Procedure" was amended to include handling of scheduled waste generated by the contractor.</li> <li>6) The scheduled waste generated by the contractor was cleared and was disposed in accordance with the SOP.</li> </ol>	<ol style="list-style-type: none"> <li>4. CONTINUOUS IMPROVEMENT PLAN (CIP) has included Scope of CIP plan shall include all area of operations including any work conducted by contractors, vendors or service provider as stated in page 2, 3<sup>rd</sup> clause.</li> <li>5. Internal Audit Procedure PPB/PRO12/(07)//0612 amended on 5 June 2021 by including             <ol style="list-style-type: none"> <li>a. Clause 2.0 – added "Contractors who do works and reside in the plantations and POMs are also included in the scope of audit."</li> <li>b. Clause 6.4.2 – added "The site conditions including contractors work sites, workshops, operations and their housings.</li> </ol> </li> </ol> <p>Status: Closed with condition</p>
11	Indicator 3.7.2  DA03 /2021	Major (Upgraded)	<p>Requirement: Indicator 3.7.2 – Records of training are maintained, where appropriate on an individual basis.</p> <p>Finding: Records of training was not maintained and available, where appropriate on an individual basis (contract workers)</p> <p>Objective evidence: Records of trainings to covers applicable aspects of the RSPO P&amp;C</p>	<p>Result of investigation and determination of root cause</p> <ol style="list-style-type: none"> <li>1) The scope of training as specified in the internal "Training Awareness and Competency SOP" was not adequately cover the contractors' workers.</li> <li>2) Contractors' workers are not included in the annual ES&amp;H Plan and ES&amp;H Training programme.</li> </ol>	<p>The corrective action plan and evidences for Major NCRs received on 6 June 2021 was reviewed from 7-14 June 2021 by auditors.</p> <p>Evidences below were verified</p> <ol style="list-style-type: none"> <li>1. Latihan Keselamatan, Laporan Latihan Hak-Hak Pekerja Kontraktor. Laporan Latihan Pemuatan Keselamatan, Hak-Hak Pekerja, Alam Sekitar Kontraktor &amp; Staff Ladang carried out for contractors' workers.</li> </ol>

**RSPO PUBLIC SUMMARY REPORT**

			<p>i.e., safety, environmental and the right of workers aspect was not available for contract workers.</p>	<p>Correction (if applicable) and corrective action plan including completion date</p> <ol style="list-style-type: none"> <li>1) Training for Contractor in respect to in RSP P&amp;C e.g., Safety and Health, Environmental and Workers Right was conducted for all contractor workers.</li> <li>2) The annual training programme and ES&amp;H plan was amended and to include contractors' workers.</li> <li>3) The training requirement for contractor had been included in the amended "Training Awareness and Competency SOP"</li> <li>4)</li> </ol>	<ol style="list-style-type: none"> <li>2. Procedure on Training, Awareness and Competency PPB/PRO03/(05)/0311 was amended on 28 May 2021 by including the list of trainings and socialization needed for contractors and shop canteen operators - Competency and / Awareness Training Requirement for External Parties Table (Vendors and Contractors)</li> </ol> <p>Status: Closed with condition</p>
12	<p>Indicator 6.7.3 (C)</p> <p>DA04/2021</p>	<p>Major (Recurrence)</p>	<p>Requirement: Indicator 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>Finding: Workers did not wear appropriate personal protective equipment (PPE) at the place of work to cover all potentially hazardous operations, such as pesticide application.</p> <p>Objective evidence:</p>	<p>Result of investigation and determination of root cause</p> <ol style="list-style-type: none"> <li>1) The staff who supervised the operation fail to monitor the use of PPE for his workers.</li> <li>2) There is no proper checklist for staff to check whether appropriate PPE are being use for the operations.</li> <li>3) There is no clear directive for staff to conduct checking and no penalty was imposed for staffs fail to check the PPE usage and for workers who are not using supplied PPE.</li> </ol> <p>Correction (if applicable) and corrective action plan including completion date</p> <ol style="list-style-type: none"> <li>1) Training was conducted to all staff for appropriate, types and importance of PPE.</li> <li>2) A PPE checklist booklet was produced for staff to make</li> </ol>	<p>The corrective action plan and evidences for Major NCRs received on 6 June 2021 was reviewed from 7-14 June 2021 by auditors.</p> <p>Evidences below were verified</p> <ol style="list-style-type: none"> <li>1. Training on Taklimat Pemahaman Mengenai Alat Pelindung Diri Kepada Pekerja on 27 May 2021 at Hibumas 1 Estate Pictures of the training, training materials and attendance list for nineteen (19) workers from Parcel 19/20 Div. HJ were verified by auditor</li> <li>2. Training on Taklimat Pemahaman Mengenai Alat Pelindung Diri Kepada Pekerja on 27 May 2021 at Hibumas 1 Estate Pictures of the training, training materials and attendance list for twelve (12) workers from parcel 12/13, Div. AB were verified by auditor</li> <li>3. Training on Taklimat Pemahaman Mengenai Alat Pelindung Diri Kepada Pekerja on 26 May 2021 at Hibumas 2 &amp; Jebawang Estate Pictures of the training, training materials and</li> </ol>

**RSPO PUBLIC SUMMARY REPORT**

			<p>During site inspection at Jebawang Estate Block 5, sighted 2 sprayers woodies Epiphyte did not wear appropriate PPE i.e., apron and goggle according to Safe and Standard Operating Procedure (SSOP) (Woodies Poisoning) and HIRARC</p>	<p>reference of appropriate PPE for each type of work.</p> <ol style="list-style-type: none"> <li>3) To ensure that all workers was given PPE an inspection and replacement had been conducted.</li> <li>4) PPE training for all workers was conducted in each of the operating unit.</li> <li>5) Clear instruction to all staffs (from Group Manager to PICs, Assistant, Staffs, Mondore) and workers on PPE checking using the checklist. Staff who fail to monitor and workers who did not use the supplied PPE will face disciplinary actions including stop work order. The checking, maintenance and replacement of PPE was conducted 3 times a week.</li> <li>6) Another training for workers was conducted in the field. The training includes type of PPE to be use, how to use, disciplinary actions, why they need to use, maintenance and replacement procedure.</li> </ol>	<p>attendance list for 23 workers were verified by auditor</p> <ol style="list-style-type: none"> <li>4. Training on Taklimat Pemahaman Mengenai Alat Pelindung Diri Kepada Pekerja on 26 May 2021 Sekar Imej, with 16 workers</li> <li>5. Taklimat Pemahaman Mengenai Alat Pelindung Diri (PPE) kepada Pekerja was conducted at Sri Kamusan to all workers and contractors on 26 May 2021 during Muster briefing</li> <li>6. Latihan PPE dan Alatan Kerja was conducted at Sri Kamusan on 26 May 2021 with 20 T.F.A and field conductor</li> <li>7. Laporan Latihan Pemahaman Mengenai Alat Pelindungan Diri (PPE) was conducted to Hibumas 1 Staff and Executive on 26 May 2021. Pictures of training and 17 participants was verified by auditor</li> <li>8. Taklimat Pemahaman Mengenai Alat Pelindung Diri Kepada Pekerja was conducted at Jebawang &amp; Hibumas 2 Estate to all workers on 26 May 2021 during Muster Ground briefing</li> <li>9. Taklimat Pemahaman Alat Pelindungan (PPE) was conducted at Sekar Imej &amp; Sapi Sugut Estate to 16 staff and executives on 26 May 2021.</li> <li>10. PPE Distribution Records of hand gloves, respirator, Apron, goggle to the sprayer on 24 May 2021 at Hibumas 1 Estate, to replace the current PPE. Records showed the PPE was given on 19 Jan 2021, and checked every month, e.g., 8 Feb, 8 March, 8 April.</li> <li>11. PPE Distribution Records of hand gloves, respirator, Apron, goggle to the sprayer on 24 May 2021 at Sapi Sugut &amp; Sekar Imej Estate, to replace the current PPE. Records showed</li> </ol>
--	--	--	--	---	---

**RSPO PUBLIC SUMMARY REPORT**

					<p>the PPE was given on 12 Jan 2021, and checked every month</p> <p>12. PPE Distribution Records of hand gloves, respirator, Apron, goggle to the sprayer on 3 March 2021 at Sri Kamusan Estate, to replace the current PPE. Records was kept since 25 May 2018. Latest records showed the PPE was replaced on 9 Feb 2021, and checked every month</p> <p>13. New Senarai Semak PPE dan Peralatan Kerja was prepared on 20 May 2021 by Group Sustainability as a guideline to ensure workers received the correct PPE against their job scope.</p> <p>Additional evidences received on 25 June 2021 was reviewed as below;</p> <p>Hibumas 1 Estate</p> <p>1. Laporan Latihan Penggunaan Alat Perlindungan Diri (PPE) dan Alatan Kerja – Harvester dated 8 June 2021 (10.30am) at Block 38, Parcel 19 at Hibumas 1 &amp; 9 June 2021 (9.00am) at Parcel 13, Block 11, Hibumas 2. pictorial report and attendance list for 12 and 14 harvester was reviewed by auditor.</p> <p>2. Laporan Latihan Penggunaan Alat Perlindungan Diri (PPE) dan Alatan Kerja – Penabur Baja dated 8 June 2021 (9.00am) at Block 40, Parcel 19 Hibumas 1 &amp; 9 June 2021 (11.00am) at Block 14, Parcel 13 Hibumas 1. Pictorial report and attendance list for 5 and 9 penabur baja was reviewed by auditor.</p> <p>3. Laporan Latihan Penggunaan Alat Perlindungan Diri (PPE) dan Alatan Kerja – Sprayer and Staff In Charge dated 8 June 2021 (7.30am) at Block 25, Parcel 14/17,</p>
--	--	--	--	--	---

**RSPO PUBLIC SUMMARY REPORT**

					<p>Hibumas 1 &amp; 9 June 2021 (11.00am) at Block 12, Parcel 13 Hibumas 1. Pictorial report and attendance list for 6 and 6 Sprayers and driver was reviewed by auditor, respectively.</p> <p>Sri Kamusan Estate</p> <p>4. Latihan Pemahaman Mengenai Jenis dan Fungsi Alat Perlindungan Diri (PPE) Kepada Pekerja Penui Buah Tandan Segar – Harvester dated 8 June 2021 at Block 011, Division A at Sri Kamusan. Pictorial report and attendance list for 23 harvester was reviewed by auditor.</p> <p>5. Latihan Pemahaman Mengenai Jenis dan Fungsi Alat Perlindungan Diri (PPE) Kepada Penabur Baja dated 9 June 2021 at Block 0041, Division C at Sri Kamusan. Pictorial report and attendance list for 13 harvester was reviewed by auditor.</p> <p>6. Latihan Pemahaman Mengenai Jenis dan Fungsi Alat Perlindungan Diri (PPE) Kepada Pekerja Penyembur Racun dan Maintenance (Pemungut Biji Lerai) dated 9 June 2021 at Block 0048, Division C at Sri Kamusan. Pictorial report and attendance list for 16 sprayer was reviewed by auditor.</p> <p>Sekar Imej and Sapi Sugut Estate</p> <p>1. Laporan Latihan Penggunaan Alat Perlindungan Diri (PPE) dan Alatan Kerja – Harvester dated 8 June 2021 at Block 012, Parcel 3 at Sekar Imej and Block 022, Sapi Sugut. Pictorial report and attendance list for 20 harvester was reviewed by auditor.</p> <p>2. Laporan Latihan Penggunaan Alat Perlindungan Diri (PPE) dan Alatan Kerja – Penabur Baja dated 8 &amp; 10 June 2021 at Block 013, Parcel 3 at Sekar Imej and Block 10, Sapi</p>
--	--	--	--	--	--

**RSPO PUBLIC SUMMARY REPORT**

					<p>Sugut. Pictorial report and attendance list for 10 workers was reviewed by auditor.</p> <p>3. Laporan Latihan Penggunaan Alat Perlindungan Diri (PPE) dan Alatan Kerja – Sprayer dated 8 &amp; 10 June 2021 at Block 003 at Sekar Imej and Block 017, Sapi Sugut. Pictorial report and attendance list for 14 workers was reviewed by auditor.</p> <p>Hibumas 2 and Jebawang Estate</p> <p>1. Laporan Latihan - PPE dan Alatan Kerja (Pekerja – Maintenance [Sprayer, Fertilizer Spreader, Chemical Application]) dated 8 June 2021 at Block 16 Jebawang and Hibumas 2. Pictorial report and attendance list for 29 workers was reviewed by auditor.</p> <p>2. Laporan Latihan - PPE dan Alatan Kerja (Pekerja – Harvester) dated 9 June 2021 at Block 15 Jebawang and Hibumas 2. Pictorial report and attendance list for 30 workers was reviewed by auditor.</p> <p>Laporan Pemeriksaan Alat Perlindungan Diri Mingguan Sugut Region. A weekly inspection conducted to all estates (Hibumas 1, Hibumas 2 &amp; Jebawang, Sekar Imej &amp; Sapi Sugut, and Sri Kamusan. The inspection was conducted every week with Monday - Wednesday and Friday with appointed PIC, for every week. The inspection schedule was reviewed and accepted by auditor.</p> <p>This was inline with memo from Group Manager to all Managers, Sr Asst. Managers, Assistant Manager, Field Staff and Mandore on instruction for weekly monitoring of workers PPE's dated 10 June 2021. New "PPE Weekly Inspection Checklist Record" form was prepared and filled during the inspection.</p> <p>Status: Closed with condition</p>
--	--	--	--	--	---

**RSPO PUBLIC SUMMARY REPORT**

13	<p>Indicator 7.3.1</p> <p>DA05/2021</p>	<p>Major (Recurrence)</p>	<p>Requirement: Indicator 7.3.1 – A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>Finding: A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics was not implemented again.</p> <p>Objective evidence:</p> <ol style="list-style-type: none"> <li>1) During site visit at Sri Kamusan Estate, Contractor Workshop at Block 11 Phase 1 sighted bottles, used tyres, cans and empty fertilizer bags was not disposed according to the waste management plan.</li> <li>2) During site visit at Hibumas 1 Estate, Contractor Workshop at Block 24 Parcel 14/17 sighted bottles, used tyres, cans, empty fertilizer bags, empty agrochemical container and used battery was not disposed according to the plan.</li> </ol>	<p>Result of investigation and determination of root cause</p> <ol style="list-style-type: none"> <li>1) The waste management for contractor is not monitored because it was not clearly spelled out in the “Storage and Disposal of Common Waste Procedure”.</li> <li>2) The scope of internal audit was confined to only the company operation and it was not included the contractors’ activities.</li> <li>3) Training for handling of waste for contractor was not conducted.</li> </ol> <p>Correction (if applicable) and corrective action plan including completion date</p> <ol style="list-style-type: none"> <li>1) The SOP for “Storage and Disposal of Common Waste Procedure” was amended to include contractors’ activities and operations.</li> <li>2) The scope of internal audit procedure had been revised to covers contractors’ activities &amp; housing.</li> <li>3) All waste was cleared and disposed off in accordance to the procedure.</li> <li>4) Training was conducted for contractor workers in handling of waste.</li> <li>5) Ensuring contractors comply with the SOP, inspections was conducted by Hospital Assistant incorporated with their weekly housing inspections.</li> </ol>	<p>The corrective action plan and evidences for Major NCRs received on 6 June 2021 was reviewed from 7-14 June 2021 by auditors.</p> <p>Evidences below were verified</p> <ol style="list-style-type: none"> <li>1. Handling, Storage and Disposal of Common Waste PPB/PRO14/(02)/2011 was amended on 29 May 2021 by Adding clause 6.1.7 - “Open burning of wastes is strictly prohibited in staff or workers housing or inside the plantations. Signage of such prohibition shall be erected at conspicuous places.” And clause 2 by including contractor into the scope.</li> <li>2. Laporan Latihan Bahan Buangan Terjadual dan Sampah was conducted.</li> <li>3. Revised Internal audit procedure (PPB/PRO12/(07)/0612 dated 5 June 2021 by including contractor in the auditing process as stated in clause2.0 – added “Contractors who do works and reside in the plantations and POMs are also included in the scope of audit” and clause 6.4.2 – added “The site conditions including contractors work sites, workshops, operations and their housing.</li> <li>4. Laporan Aktiviti Pembersihan Kawasan Kontraktor (undated) showed the pictures of cleaning contractor’s parking area (Hibumas 1), disposing all used chemical and lubricant found during cleaning to Scheduled Waste Store (Sri Kamusan), and disposal of used lubricant oil from contractor’s workshop to Scheduled Waste Store (Hibumas 2 &amp; Jebawang Estate)</li> </ol>
----	---	---------------------------	--	--	---

**RSPO PUBLIC SUMMARY REPORT**

					<p>Additional evidences received on 25 June 2021 were reviewed by auditor as below;</p> <p>To ensure contractors complying with the SOP, inspections was conducted by Hospital Assistant (HA) incorporated with their weekly housing inspections. Weekly inspection which also covered the contractor site. The contractor now also conducted repair using Estate's workshop and they also stay at workers H type housing.</p> <p>Status: Closed with condition</p>
14	<p>Indicator 7.3.3</p> <p>DA06/2021</p>	Minor	<p>Requirement: Indicator 7.3.3 – The unit of certification does not use open fire for waste disposal.</p> <p>Finding: The unit of certification does use open fire for waste disposal.</p> <p>Objective evidence: During audit at Sri Kamusan worker's quarters site and contract workers housing site at Block 11 Phase 1, traces of burnt waste were sighted. Interview with workers confirmed they had used fire for waste disposal.</p>	<p>Result of investigation and determination of root cause</p> <ol style="list-style-type: none"> <li>1) The awareness of company policy of baring waste to be disposed by using fire was insufficient.</li> <li>2) The frequency of waste disposal was inadequate.</li> </ol> <p>Correction (if applicable) and corrective action plan including completion date</p> <ol style="list-style-type: none"> <li>1) Awareness of prohibiting waste to be disposed by using fire was conducted to all workers.</li> <li>2) Warning sign was erected at housing site prohibiting waste to be disposed using fire.</li> <li>3) Traces of waste burned was cleared and disposed accordingly.</li> <li>4) Estate has increased the frequency of waste disposal to twice a week.</li> </ol>	<p>The corrective action plan and evidences for Major NCRs received on 6 June 2021 was reviewed from 7-14 June 2021 by auditors.</p> <p>Evidences below were verified</p> <ol style="list-style-type: none"> <li>1. Laporan Taklimat Mengenai Larangan Pembakaran Terbuka Dan Kebersihan Kawasan Ladang were carried out.</li> <li>2. Report on Papan Tanda Larangan Pembakaran Terbuka / Sampah (undated) showed pictures of open burning prohibition signs have been installed in residential areas.</li> </ol> <p>Additional evidences received on 25 June 2021 were reviewed by auditor as below</p> <p>The revised waste disposal schedule for all the housing site were increased to twice a week.</p> <p>Status: Accepted</p> <p>The effectiveness of the action taken to be verified during the next audit</p>



**RSPO PUBLIC SUMMARY REPORT**

15	<p>Indicator 7.10.3 (C)</p> <p>DA07/2021</p>	<p>Major (Recurrence)</p>	<p>Requirement: Indicator 7.10.3 (C) – Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored.</p> <p>Finding: Waste and Pollution – Identification, Prevention, Mitigation and Improvement Plan was not implemented and monitored.</p> <p>Objective evidence:</p> <p>1) During site inspection at Sri Kamusan Estate, Contractor Workshop Block 11 Phase 1, sighted a lot of lubricant/hydraulic oil spillage on the ground. From the observation, the used lubricant/hydraulic oil was not appropriately disposed. Furthermore, no action has been taken on the oil spillage during the audit time.</p> <p>2) During site inspection at Hibumas 1 Estate, Contractor Workshop Block 24 Parcel 14/17 sighted a lot of lubricant/hydraulic oil spillage on the ground. From the observation, the used lubricant/hydraulic oil was not appropriately disposed. Furthermore, no action has been taken on the oil spillage during the audit time.</p>	<p>Result of investigation and determination of root cause</p> <ol style="list-style-type: none"> <li>1) The Environmental Impact and Aspect Assessment and Mitigation Measure has not covered the contractor activities and operations.</li> <li>2) Scope of the internal audit procedure was not covered contractors’ operations and activities.</li> <li>3) The procedure of schedule waste disposal does not cover contractors’ activities and operations.</li> <li>4) No training in waste disposal was conducted for contractor’s workers.</li> </ol> <p>Correction (if applicable) and corrective action plan including completion date</p> <ol style="list-style-type: none"> <li>1) The Environmental Impact and Aspect Assessment and Mitigation Measure was conducted covering the contractors’ activities and operations.</li> <li>2) The Internal Audit Procedure was amended which also covered contractors’ activities and operations.</li> <li>3) All traces of inappropriate disposal of scheduled wastes were disposed in accordance to company procedure.</li> <li>4) Training in disposal of scheduled waste was conducted for contractors’ workers.</li> <li>5) Contractor are allowed to use company facilities for disposing their scheduled waste.</li> </ol>	<p>The corrective action plan and evidences for Major NCRs received on 6 June 2021 was reviewed from 7-14 June 2021 by auditors.</p> <p>Evidences below were verified</p> <ol style="list-style-type: none"> <li>1. A memo or letter to “Surat Pematuhan” regarding to compliance of Safety, Health, Environmental and workers right issued to workers.</li> <li>2. Training on Schedule Waste and Domestic Waste provided.</li> <li>3. Revised Internal audit procedure (PPB/PRO12/(07)/0612 dated 5 June 2021 by including contractor in the auditing process as stated in clause2.0 – added “Contractors who do works and reside in the plantations and POMs are also included in the scope of audit” and clause 6.4.2 – added “The site conditions including contractors work sites, workshops, operations and their housing</li> <li>4. Laporan Latihan Bahan Buangan Terjadual dan Sampah provided.</li> <li>5. Training on Schedule Waste and Domestic Waste to Syarikat Pengangkutan Nur Contractor was conducted on 28 May 2021 at contractor workshop, Hibumas 2 &amp; Jebawang Estate. Pictures of the training and attendance list for 19 workers were verified by auditor</li> </ol> <p>Status: Closed with condition</p>
----	--	---------------------------	--	---	--

## RSPO PUBLIC SUMMARY REPORT

**NOTES:**

*In accordance with the decision made by CB management and mutually agreed by the CH, the onsite verification on MAJOR NCs were initiated to further confirm implementation of plans as specified in the documented evidence. However, due to the travel restrictions during EMCO, the onsite verification has been postponed to a later date. To be in compliance with the RSPO System requirements, all MAJOR NCs were close within the stipulated timeline as it has been supported with adequate evidence that the CH has addressed the issues highlighted in the NCs. Nevertheless, the onsite verification (through the provision of special audit as stated in CB established procedure) will be carried out as soon as the EMCO is lifted, inter-state travel is permitted, and CH is declared safe for visitors. It has been established that all Major NCs will be reviewed and checked in terms of the effectiveness of its onsite implementation.*

**RSPO PUBLIC SUMMARY REPORT**

**ATTACHMENT 5**

**STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED DURING SURVEILLANCE AUDIT 4 (2020)**

<b>P &amp; C Indicator</b>	<b>Specification Major/Minor</b>	<b>Detail Non-conformances</b>	<b>Verification by Assessor</b>
2.1.1 DA 01 2020 (1)	Major	<p>Finding: The unit of certification not complies with Environmental Quality (Scheduled Wastes) Regulations 2005, refer to Storage of scheduled wastes, Regulation 10. Labelling of scheduled wastes.</p> <p>Objective evidence: 1) During site visit at Workshop (Hibumas 1 Estate), no labelling of SW 410. 2) During site visit at Workshop (Hibumas 2 Estate), sighted no labelling of SW 410, SW 312 and SW 305.</p>	<p>They had sent the copy of the training conducted by EHS Officer (and weekly report dated 16 April 202. In the weekly report contained picture of labelling scheduled wastes of SW 410 at Hibumas 1 Estate and SW 410, SW 312 and SW 305 at Hibumas 2 Estate.</p> <p>Audit at Hibumas 1 Estate and Jebawang Estate found not complied with the regulation on Occupational Safety and Health (Notification of Accident, Dangerous Occurrence, Occupational Poisoning and Occupational Disease) Regulations 2004, Regulation 10 Records Subsection 3. Based on JKPP 8 form for all accidents and dangerous occurrences which have occurred in year 2020 was send after 31 January 2021. Consequently, recurrence Major DA 01/2021 was raised with difference issues but same indicator.</p>
2.1.1 DA 01 2020 (2)	Major	<p>Finding: The unit of certification not comply with Occupational Safety And Health (Use And Standards Of Exposure Of Chemicals Hazardous To Health) Regulations 2000, refer to Regulation 27 Health surveillance programme</p> <p>Objective evidence: During our interview with 3 workers (1 Maintenance Operator &amp; 2 Workshop Operator) at Sri Kamusan POM who are recommended unfit to handle chemical by the OHD (referring to medical surveillance report dated 05/03/2019), it was found out that 2 unfit workers (Workshop Operator) still continue as Workshop Operator and still handling the chemicals (Manganese).</p>	<p>The auditor had been verified as follows: i) Copy of the briefing medical surveillance result dated 4/4/2020 has been verified. ii) Notification letter dated 10/5/2020 to transfer the workers to other area or job designated due to medical obstacles.</p> <p>Audit at Hibumas 1 Estate and Jebawang Estate found not complied with the regulation on Occupational Safety and Health (Notification of Accident, Dangerous Occurrence, Occupational Poisoning and Occupational Disease) Regulations 2004, Regulation 10 Records Subsection 3. Based on JKPP 8 form for all accidents and dangerous occurrences which have occurred in year 2020 was send after 31 January 2021. Consequently, recurrence Major DA 01/2021 was raised with difference issues but same indicator.</p>
2.1.1 RZ 01 2020 (3)	Major	<p>Finding: Sri Kamusan CU could not demonstrate that it complies with the Immigration Act 1959 (Act 155).</p>	<p>Auditor had verified the following: 1. Letter "Notis Pemberhentian Kerja" dated 3 Jun 2020 from management of Hibumas 1 Estate to the workers. 2. Police report no TELUPID/000320/20 on missing passport of the 2 workers Both of them not remember their passport no.</p>

**RSPO PUBLIC SUMMARY REPORT**

		<p>Objective evidence: The sampled workers are working at the respective estates without any Passport. This is not in accordance with Section 55B of the Immigration Act.</p>	<p>3. Passports Online registration for stay and continue working.</p> <p>Status: Closed</p>
3.4.3 (1) DA 02 2020	Major	<p>Finding: The environmental management and monitoring plan was not fully implemented.</p> <p>Objective evidence: The new activities of removing/clear the biodiversity area at Hibumas 1 Estate has not been assessed/identified in the Identification of Environmental Aspect and Impact and Evaluation of Significance.</p>	<p>i) Copy of the EAI of Conservation Area and Mitigation dated 4/4/2020 had been verified. ii) EAI &amp; mitigation plan memo dated 13/4/2020 had been verified.</p> <p>During this audit (2021), it was found the action has been updated in the Action Plan – assisted by security in column 13.</p> <p>Status: Closed</p>
3.4.3 (2) RZ 02 2020	Major	<p>Finding: Social issue has not been identified when reviewing and updating the social management and monitoring plans.</p> <p>Objective evidence:</p> <ol style="list-style-type: none"> <li>The risky practice of carrying a large amount of cash of more than RM300,000 by 'gang leaders' or 'mandores' every month to pay the workers' wages has not been taken into account when reviewing and updating the social management and monitoring plan of all estates and Mill at Sri Kamusan CU.</li> <li>The physical condition and amenities of the school dormitory at Sekar Imej Estate were not included in the SIA Assessment Management Action Plan 2020 of Sekar Imej Estate dated 20 Feb 2020.</li> </ol>	<p>Auditor had verified as follows:</p> <ol style="list-style-type: none"> <li>Updated SIA management action plan on the finding item No 1, the management appointed a security as escort every month the mandore want to change the cheque at city.</li> <li>Updated SIA management action plan on the finding item No 2, the budget was put in on year 2018 and 2019 but both of the year was rejected by the management, so on 2020 the management decide to repair which part is broken and to provide amenities which is in budget of RM 4,000.00.</li> </ol> <p>During this audit (2021), it was found the action has been updated in the Action Plan – assisted by security in column 13.</p> <p>Status: Closed</p>
3.6.1 (1) DA 03 2020	Major	<p>Finding: Certain operation has not been risk assessed to identify H&amp;S issues.</p> <p>Objective evidence: Certain work operation/activities have not been risk assessed at Hibumas 1 Estate:</p> <ol style="list-style-type: none"> <li>Circle Spraying</li> </ol>	<p>The risk is assessed through the implementation of HIRARC to all estates in the CU. Sri Kamusan CU have implemented a SOP that states the importance of risk assessment through HIRARC. All work units that have been identified to have potential risks are documented and the sampled areas are as follows. Mitigation plans and control procedures such as PPE, administrative control and trainings were documented.</p>

**RSPO PUBLIC SUMMARY REPORT**

		<p>2) Manuring 3) Machineries work 4) Harvesting evacuation using buffalo 5) Workshop</p> <p>HIRARC Form sighted was not following the Guidelines/Procedures HIRARC 2008 (6.2 Documenting process) at Hibumas 1 Estate, Hibumas 2 Estate and Sekar Imej Estate:</p> <p>1) Use double form format (not standardize) 2) Record the names and designation of HIRARC was not available 3) Outline the process workflow and indicate and indicate in the form under "process/location column was not available 4) Indicate the follow up action date and status was not available</p>	<p>HIRARC Form sighted was following the Guidelines HIRARC 2008 (6.2 Documenting process):</p> <p>a. Use single form format (standardize form for all estates) b. Record the names and designation of HIRARC available c. Outline the process workflow and indicate and indicate in the form under process/location column available and follow the guideline d. Indicate the follow up action date and status available and satisfactory</p> <p>Status: Closed</p>
3.6.1 (2) DA 03 2020	Major	<p>Finding: Safety mitigation plans are not implemented and monitored.</p> <p>Objective evidence: During site visit at Hibumas 1 Estate Parcel 13 (Wooden Houses), sighted an acetylene tank which was not chained and fixed securely causing the risk of an explosion.</p>	<p>Besides that, risk assessment on activities such as circle spraying, manuring, machineries work, harvesting evacuation via Errapi Buffalo and workshop activities have been carried out and control measures determined.</p> <p>Furthermore, safety mitigation plans were implemented and monitored. During site visit at Hibumas 1 Estate Parcel 13 (Wooden Houses), Sri Kamusan/Jebawang/Sapi Sugut Estate workshop, sighted an acetylene tank was properly chained and fixed securely.</p> <p>Status: Closed</p>
3.7.2 DA 04 2020	Minor	<p>Finding: Certain records of work activities/operation training are not maintained</p> <p>Objective evidence: Certain records of work activities/operation training are not maintained at Hibumas 1 Estate:</p> <p>1) Fire Drill 2) IPM Training 3) Harvesting Training 4) Manuring Training 5) Loading Ramp Training 6) Scheduled Wastes Training</p>	<p>All staff and workers at all estates are appropriately trained to covers applicable aspects of the RSPO P&amp;C i.e. Fire Drill, IPM Training, Harvesting, Manuring, Loading Ramp, Scheduled Wastes etc., in a form they understand, and which includes assessments of training. Thus, previous Minor NCR has been remedied to all workers and staff only. However, during this recertification audit (2021), certain records of trainings to covers applicable aspects of the RSPO P&amp;C i.e., safety, environmental and social aspect was not available for contract workers (FFB Driver).</p> <p>Status: Major (Upgraded) NCR DA 03 2021 was raised.</p>

**RSPO PUBLIC SUMMARY REPORT**

<p>6.7.2 DA 05 2020</p>	<p>Minor</p>	<p>Finding: Accident and emergency procedures are not in place.</p> <p>Objective evidence: 1) During site visit at Hibumas 1 Estate Workshop, sighted Emergency Shower was not available. 2) During site visit at Sri Kamusan POM Worker Quarters, sighted Fire Extinguisher was not available. 3) During site visit at Sekar Imej Estate Chemical Store, the emergency shower was not available at workplace.</p>	<p>During this audit (2021), accident statistics were being maintained in a satisfactory manner and periodically reviewed. Accident/injury record were recorded using Lost Time Accident during fiscal monthly basis. Quarterly review on accident cases had been carried out during quarterly OSH committee meeting. During this recertification audit, sighted accident and emergency procedures was in place accordingly: 1) Site visit at Hibumas 1 Estate Workshop, sighted Emergency Shower was available and well-functioning. 2) Site visit at Sri Kamusan POM Worker Quarters, sighted Fire Extinguisher was available and not expired. 3) Site visit at Sapi Sugut Estate Chemical Store and Workshop, sighted Emergency Shower was available well-functioning. 4) Site visit at Seri Kamusan Estate Chemical Store and Workshop, sighted Emergency Shower and Eye Wash was available and well-functioning. 5) Site visit at Jebawang Estate Chemical Store and Workshop, sighted Emergency Shower and Eye Wash was available and well-functioning.</p> <p>Status: Minor NCR DA 05/2020 was acceptable to closed.</p>
<p>6.7.3 DA 06 2020</p>	<p>Major</p>	<p>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) as per the SSOP.</p> <p>Objective evidence: 1) During interview with sampled harvesters and verification of "Daily PPE Checklist for Harvester", there is no free of charge provided for personal protective equipment (harvesters shoe) to harvesters. 2) During site visit at Hibumas 1 Estate B006 (Parcel 13), sighted 1 harvester did not wear appropriate PPE i.e. Safety helmet and goggle. 3) During site visit at Hibumas 2 Estate B007 (Parcel 2/3), sighted 4 harvesters did not wear appropriate PPE i.e goggle.</p>	<p>Site visit or inspection has been carried out at this area: 1) Sri Kamusan Estate (Selective Spraying at B20, LF Collection at B47, Manuring at B37 and Harvesting at B38) 2) Hibumas 1 Estate (Harvesting at Div. 3 B24, LF Collection at Div. 3 B26, LF Collection at Div. 2 B25 and Harvesting at Div. 2 B24) 3) Jebawang Estate (Harvesting at B3, LF Collection at B3 and Spraying Woodies at B5) 4) Sapi Sugut Estate (Harvesting at B20)</p> <p>From the site visit or inspection as pe mention area above, spraying activities, harvesting activities, manuring activities and LF collection, the workers were seen to wearing appropriate PPE such as face masks respirators, goggles, rubber boots, nitrile gloves, apron and hard hat, to cover all potentially hazardous operations. However, site inspection at Jebawang Estate Block 5, sighted 2 sprayers woodies Epiphyte did not wear appropriate PPE i.e., apron and goggle according to SSOP and HIRARC.</p> <p>Status: Major (Recurrences) NCR DA 04/2021 was raised</p>

**RSPO PUBLIC SUMMARY REPORT**

<p>7.3.1 DA 07 2020</p>	<p>Minor</p>	<p><b>Finding:</b> The waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics was not fully implemented.</p> <p><b>Objective evidence:</b> 1) During site visit at Hibumas 1 Estate Chicken Farm, sighted empty agrochemical container, bottle, tyre and fertilizer bag was not disposed according to the Waste Management Plan. 2) During site visit at Hibumas 1 Estate Parcel 13 (Wooden Houses), sighted empty agrochemical container and tyre was not disposed according to the Waste Management Plan. 3) During site visit at Hibumas 1 Estate Landfill, sighted landfill was not properly covered, with clear demarcation and signage to avoid disturbance. (Guidelines of RSPO MYNI 2019).</p>	<p>During this recertification audit (2021), The waste disposed were seen only household and food waste and disposed via estates landfill. As for the line-site cleaning, it scheduled on weekly basis by Hospital Assistant. The domestic waste being collect by estate workers twice weekly and being segregate before goes to dumping site. In the meantime, for previous issues regarding Hibumas 1 Estate Landfill, sighted landfill was properly covered, with clear demarcation and signage to avoid disturbance. (Guidelines of RSPO MYNI 2019).</p> <p>Nonetheless, the waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics was not effectively implemented.</p> <p>Status: Major (upgraded) NCR DA 05/2020 has been issued</p>
<p>7.8.2 DA 08 2020</p>	<p>Major</p>	<p><b>Finding:</b> Water courses and wetlands are not protected.</p> <p><b>Objective evidence:</b> 1) During site visit at Buffer Zone Sri Kamusan Estate B46/47-Division 3, sighted pesticides application and EFB application has been carried out. 2) During site visit at Buffer Zone Hibumas 1 Estate B040 Parcel 19, sighted pesticides application has been carried out.</p>	<p>Auditor had been verified training which were done on 30/04/2020 at Sri Kamusan Estate and 02/06/2020 at Hibumas 1 Estate by the EHS officer.</p> <p>The estates have protected the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SOP Riparian, Floodplain &amp; Water Bodies Management with revision dated December 2020 to maintain the buffer by restricting agrochemicals application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The signboards were displayed accordingly at the site where applicable. During the field visit at Sri Kamusan / Hibumas 1 / Jebawang / Sapi Sugut Estate there was no spraying activities, EFB application or signs left in such an area</p> <p>Status: Closed</p>
<p>7.10.3 DA 09 2020</p>	<p>Major</p>	<p><b>Finding:</b> Waste and Pollution – Identification, Prevention, Mitigation and Improvement Plan was not fully implemented and monitored.</p>	<p>During site inspection at Sri Kamusan Estate, Contractor Workshop Block 11 Phase 1, sighted a lot of lubricant/hydraulic oil spillage on the ground. From the observation, an old lubricant/hydraulic oil usage was noted and it has not been appropriately disposed. Furthermore, no action has been taken on the oil spillage during the audit time.</p>

**RSPO PUBLIC SUMMARY REPORT**

		<p>Objective evidence: Mitigation and prevention on agrochemical usage and oil usage was not implemented and monitored. Sighted chemical and oil spillage at:</p> <ol style="list-style-type: none"> <li>1) Sri Kamusan Estate – B14 (Selective Spraying area) – Glyphosate</li> <li>2) Hibumas 1 Estate – Scheduled Wastes Store – Oil Spillage</li> <li>3) Hibumas 1 Estate - Parcel 13 (wooden houses) – Oil Spillage</li> </ol>	<p>During site inspection at Hibumas 1 Estate, Contractor Workshop Block 24 Parcel 14/17, sighted a lot of lubricant/hydraulic oil spillage on the ground. From the observation, an old lubricant/hydraulic oil usage was noted and it has not been appropriately disposed. Furthermore, no action has been taken on the oil spillage during the audit time.</p> <p>Mitigation and prevention on workshop activity were not implemented and monitored</p> <p>Status: Recurrence Major NCR DA 07/2021 was raised</p>
3.2.1 DA 10 2020	Major	<p>Finding: The action plan for continuous improvement was not fully implemented, based on consideration of the main environmental impacts and opportunities of the unit of certification.</p> <p>Objective evidence: There is no improvement on the main environmental impacts for the following activities/operations:</p> <ol style="list-style-type: none"> <li>1) Wastes Management (Scheduled Wastes &amp; Recycling Wastes)</li> <li>2) Buffer Zones</li> <li>3) Chemical/Oil Spillage</li> </ol>	<p>During this recertification audit (2021), it was found the action plan for continuous improvement at Hibumas 1 and Sri Kamusan Estates were not satisfactorily implemented. Corrective action plan during last surveillance 4 audit (DA10/2020) was not effectively implemented as the following activities/operation below:</p> <ol style="list-style-type: none"> <li>1) Wastes Management (Scheduled Wastes &amp; Recycling Wastes) at Sri Kamusan Estate, Contractor Workshop Block 11 Phase 1 and Hibumas 1 Estate, Contractor Workshop Block 24 Parcel 14 (7.3.1)</li> <li>2) Lubricant / Hydraulic Oil Spillage at Sri Kamusan Estate, Contractor Workshop Block 11 Phase 1 and Hibumas 1 Estate, Contractor Workshop Block 24 Parcel 14 (refer indicator 7.10.3)</li> </ol> <p>Again, the action plan for continuous improvement was not fully implemented, based on consideration of the main environmental impacts and opportunities of the unit of certification.</p> <p>Status: Major (Recurrence) DA02/2021 was raised.</p>
2.2.2 RZ 03 2020	Minor	<p>Finding: Contractors are not able to demonstrate compliance with applicable legal requirements.</p> <p>Objective evidence: 1. Two contractors are not able to demonstrate compliance with legal requirements by not paying their workers SOCSO or insurance (Syarikat Sri Timulus) and paying</p>	<p>During this recertification audit (2021), audit found two contractors of FFB transporter at Hibumas 1 Estate and at Sapi Sugut Estate were not able to demonstrate compliance with legal requirements by not paying their workers EPF, and SOCSO or insurance.</p> <p>Status: Minor RZ 03/2020 was upgraded to Major NCR RAR 01/2021</p>



**RSPO PUBLIC SUMMARY REPORT**

		wages after the 7 <sup>th</sup> of every month. (Syarikat Sri Timulus and Golden Maxim Resources). 2. Two contractors are not able to demonstrate compliance with requirements by the company by allowing person under 18 to work in the field (EFB application – contractor Nain bin Azis and Zainun).	
6.2.3 RZ 04 2020	Major	<p><b>Finding:</b> Compliance with laws related to overtime and work on rest day have not been demonstrated.</p> <p><b>Objective evidence:</b></p> <ol style="list-style-type: none"> <li>The following harvesters at Sri Kamusan Estate worked in excess of 8 hours and not paid at a rate which is 1 ½ times his hourly rate of pay. (Workers' Passports No. C4657022, C4657019, C4657026, C4658396, C4657002, AU266166, C4657677, SU/SK/0218/1231). This is not in accordance with Section 104(6) Sabah Labour Ordinance which states that for any overtime work carried out in excess of the normal hours of work, the employee shall be paid at a rate which is not less than one and a half times his hourly rate of pay irrespective of the basis on which his rate of pay is fixed.</li> <li>The following workers at Sri Kamusan Estate (Workers' Passports No. C4657022, C4657019, C4657026, C4658396, C4657002, AU266166, C4657677 and SU/SK/0218/1231) worked on a rest day and paid a normal rate. This is not in accordance with Section 104C (5) Sabah Labour Ordinance which states that an employee employed on piece rates who works on a rest day shall be paid twice his ordinary rate per piece.</li> <li>Worker No. SU/SK/0519/1358 at Sri Kamusan Estate received RM952.96 gross wages in June 2019, and no top up to meet the minimum wages was done. This is not in accordance with Section 6 Minimum Wages Order 2020 and the Guidelines on the Implementation of the Minimum Wages Order.</li> </ol>	<p>For the correction no 1 and 2: Details of the payment has been attached. Also thumb print and acknowledgement of the payment pending from the month of January 2020 until March 2020.</p> <p>3. Findings no 3 the correction accepted as the evidence of the top up was available.</p> <p>During site visit at Sri Kamusan estate, document reviews and interview with mandore and workers (loose fruit gangs) said that they all are working until 6am to 2pm. Based on pay slips review on month of January, February, and March 2021 total salary was not meet minimum wages order (average RM650-RM 960) and during monitoring of checkroll for month January, February, and March, 2021, no attendance list for workers and no evidence of incomplete task (half day works) has been recorded by staff in charge. However, management has taken initiatives to back paid (top up) for all that 3 months on months of April. It was confirmed through interview with workers and staff in charge for that employee.</p> <p>Status: Closed</p>
4.1.1 RZ 05 2020	Major	<p><b>Finding:</b> The policy to respect human rights and prohibiting retaliation against HRD has not been communicated.</p>	<p>Auditor had verified copy of letters on The Human Rights Policy and Human Rights Framework including Human Rights Defenders to the workers, staff, contractors and nearby communities.</p>

**RSPO PUBLIC SUMMARY REPORT**

		<p>Objective evidence: Based on interview with workers, there was 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.</p>	<p>During this recertification audit (2021), the understanding among all levels of workforce and local communities of what HRD and the prohibition against retaliation towards HRDs was increased. It was noted that all of them were aware related to HRD policies.</p> <p>Status: Closed</p>
6.2.1 RZ 06 2020	Major	<p>Finding: Contract workers are not given documents of pay and no explanation was given to them.</p> <p>Objective evidence: Documents detailing calculation of monthly payments that give accurate information on compensation for all work performed are not given to contract workers at Parcel 10 and Parcel 13, Hibumas 1 Estate.</p>	<p>Copy of the briefing to the contractors had been conducted on 11/6/2020 were verified.</p> <p>it was found during the audit that contract workers were given documents of pay slips to them. Documents detailing calculation of monthly payments that give accurate information on compensation for all work performed are given to contract workers at Estate</p> <p>Status: Closed</p>
6.2.4 RZ 07 2020	Major	<p>Finding: Hibumas 1 Estate does not provide adequate housing, sanitation facilities, medical, educational and welfare amenities to national standards or above.</p> <p>Objective evidence:</p> <ol style="list-style-type: none"> <li>1. Houses provided to contract workers at Parcel P13 are dilapidated, not kept in good state of repair and sanitary condition with weakened roof structure, broken drains, and no proper drainage.</li> <li>2. Also sighted during the audit were children between the ages of 5 to 10 years not receiving education.</li> <li>3. Housing inspection at Parcel P13 was last conducted in October 2019.</li> </ol>	<ol style="list-style-type: none"> <li>1. Letter dated 10/4/2020 has been verified. The letter from Group Manager was instructed the Manager In Charge to put whether permanent or contract workers in good condition and safe houses.</li> <li>2. Copy of the census on the occupancy and the children has been done on 13/4/2020 at Parcel 13.</li> <li>3. Photo of the housing in parcel 13 has been demolished.</li> </ol> <p>it was observed during the audit that all Estates has provide adequate housing, sanitation facilities, medical, educational and welfare amenities to national standards or above to checkroll workers, local workers, foreign workers, and contract workers. The houses were in good condition with treated and clean water, good state of repair and sanitary condition, good drainage system. Also sighted during the audit all the children between the ages of 5 to 10 years were receiving education at HUMANA. It was confirmed through interview with parents, and HUMANA teachers. Housing inspection at Parcel P13 was last conducted in weekly basis and linesite inspections are being carried out at least once a fortnight by the Health Assistants sometimes together with the Visiting Medical officer</p> <p>Status: Closed</p>

**RSPO PUBLIC SUMMARY REPORT**

<p>1.1.5 MZK 01 2020</p>	<p>Minor</p>	<p>Finding: There is no current list of contact and details of stakeholders and their nominated representatives.</p> <p>Objective evidence: Hibumas 2 – The Stakeholder list in the estate was not updated to include critical stakeholder who have Land Claim with the management.</p>	<p>The current list of contact and details of stakeholders and their nominated representatives were highlighted in the updated stakeholder list. It was verified in all four (4) Estates during the audit.</p> <p>Status: Closed</p>
<p>2.1.3 MZK 02 2020</p>	<p>Minor</p>	<p>Finding: Legal or authorised boundaries were not clearly demarcated and visibly maintained.</p> <p>Objective evidence: i. Sri Kamusan – legal boundaries between Sri Kamusan Estate with Sayongmas Plantation and Kampung Tangkangit was not clearly demarcated and visibly maintained ii. Hibumas 1 – legal boundaries between Hibumas 1 Estate with IJM Plantation and Kampung Kaliaga was not clearly demarcated and visibly maintained</p>	<p>Visit to boundaries at kg Tangkanit adjacent with Sri Kamusan Estate (block 5) found the pegging or boundary stone 367/221 was not in place and boundaries was not maintained.</p> <p>Visit to boundaries with Sayongmas Plantation with Sri Kamusan Estate (block 36) found the boundary no 315/221 was available and maintained. It was verified with Sri Kamusan Boundary Stone Map dated 11/2/2016</p> <p>Visit to boundaries with IJM adjacent with Hibumas 1 Estate (block 47) found the pegging or boundary stone was not in place and boundaries was not maintained.</p> <p>Visit to boundaries with IDC adjacent with Hibumas 1 Estate (block 23) found the pegging or boundary stone was not in place and boundaries was not maintained.</p> <p>Status: upgraded to Major NCR KN01/2021</p>
<p>Supply Chain Documented procedures 5.3.1, D.3, E.3 MZK 03 2020</p>	<p>Major</p>	<p>Finding: 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 was not able to demonstrate awareness of the organisation's procedures for the implementation of this standard.</p> <p>Objective evidence: During visit at Sri Kamusan POM weighbridge, weighbridge Clerk was not able to demonstrate awareness of the</p>	<p>The correction accepted.</p> <p>Status: Closed</p>

**RSPO PUBLIC SUMMARY REPORT**

		organisation's procedures for the implementation of SCCS standard.	
Supply chain Internal Audit 5.3.2 MZK 04 2020	Major	<p><b>Finding:</b> A written procedure to conduct annual internal audit was insufficient.</p> <p><b>Objective evidence:</b> There is a supply chain procedure in file, SKPOM RSPO – SCC dated 1/2/2020. However, is not conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p>	<p>The correction accepted.</p> <p>Status: Closed</p>
Supply chain 5.5.2 MZK 05 2020	Major	<p><b>Finding:</b> There were no explicit procedures for the outsourced process.</p> <p><b>Objective evidence:</b> There is a supply chain procedure in file, SKPOM RSPO – SCC dated 1/2/2020. However, there is no explicit procedures for the outsourced process.</p>	<p>The correction accepted.</p> <p>Status: Closed</p>
7.12.4 MZK 06 2020	Major	<p><b>Finding:</b> The integrated management plan was not developed in consultation with relevant stakeholders and not consider any relevant wider landscape level considerations (where these are identified).</p> <p><b>Objective evidence:</b> There is HCV management Plan, However the Plan was developed without consultation with relevant stakeholders in adaptive to changes in HCVs plans. HCV plan also was not highlighting:</p> <p>1. Identifying, protecting and/or enhancing forest connectivity important for biodiversity, ecosystem services. e.g at Hibumas 1 Estate HCV at Parcel 21, 14 and 17 site there are too many biodiversity there, but no</p>	<p>During this recertification audit (2021), it was found the “High Conservation Value (HCV) Monitoring &amp; Action Plan (2015-2019)” was amended to “Review &amp; Summary HCV Management and Action Plan (2019-2020)”. An effort has been made by the Sri Kamusan CU to identify, protect and/or enhance forest connectivity in CU including new project of “Sekar lmej Conservation Area project”. However, the amended action plan was not sufficient to comply with indicator 7.12.4.</p> <p>Visit to HCV site at Sri Kamusan Estate (Block 55), Hibumas 1 (Parcel 21), Jebawang Estate (Block 10) found the signage was not sufficient, as required in Sri Kamusan’s HCV Management and Action Plan (2019-2020).</p> <p>Sri Kamusan CU has identified significant stakeholders. i.e., HUTAN (NGO), Sabah Wildlife Department, SEARRP, Sabah Forestry Department (Forest Research Centre Department) and others. However, proper or official consultation with these stakeholders to review the management plan was not conducted.</p>

**RSPO PUBLIC SUMMARY REPORT**

		<p>updated assessment/report to highlight the important of Biodiversity and ecosystem services there, no map of Biodiversity and ecosystem.</p> <p>2. Avoiding damage to and deterioration of HCV habitats, for example by ensuring that HCV areas are connected, corridors are conserved and marked e.g at all HCV site visited at Sri Kamusan Estate, Hibumas 1, Hibumas 2 and Sekar Imej there are no signage sighted</p>	<p>The HCV Management Plan was not developed without consultation with relevant stakeholders in adaptive to changes in HCVs plans.</p> <p>Corrective action plan from the last surveillance audit (2020) was not effectively implemented.</p> <p>Status: Major NCR MZK06/2020 was re-issued (recurrence) to Major NCR KN03/2021</p>
7.12.7 MZK 07 2020	Minor	<p>Finding: The HCV, conservation areas and RTE species is not monitored properly and Outcomes of this monitoring are not fed back into the management plan</p> <p>Objective evidence: - The monitoring of HCV has been conducted at Sri Kamusan Estate, Hibumas 1, Hibumas 2 and Sekar Imej Estate, However, the monitoring was not properly conducted as The CU conducted on sampling basis at HCV area.</p> <p>- The outcomes of the HCV monitoring also were not fed back into the management plan.</p>	<p>The outcomes of the HCV monitoring in the HCV Management Plan were not fed back into the management plan at Sri Kamusan and Hibumas 1 Estate.</p> <p>Status: upgraded to Major NCR indicator 7.12.4</p>

**RSPO PUBLIC SUMMARY REPORT**

**ATTACHMENT 6 – Timebound Plan**

**Time Bound Plan of Wilmar International Limited**

**Malaysia**

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

**RSPO PUBLIC SUMMARY REPORT**

**Indonesia (Kalimantan)**

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
			KUD Karya Bersama, KUD Sejahtera Bersama, KUD Tabiku Makmur, KUD Kosudra	Central Kalimantan	2023	Re-Audit, initial certification to proceed after land title process
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 Nov 2017; 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; initial 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
			KUD Karya Makmur Pahirangan	Central Kalimantan	2023	Land title issue

**RSPO PUBLIC SUMMARY REPORT**

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
			KUD Makmur Sejahtera	Central Kalimantan	2023	Land title issue
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	PT Agro Nusa Investama (Sambas)	PT Agro Nusa Investama (Sambas) mill	ANI Sambas	West Kalimantan	2019	Certified
			KUD Cempaka Biru dan Sentama Lestari	West Kalimantan	2019	Certified
			Srimaram estate	West Kalimantan	2023	Land title issue
12	PT Bumipratama Khatulistiwa	PT Bumipratama Khatulistiwa mill	Bumi Pratama Khatulistiwa	West Kalimantan	2016	Certified
			Buluh Cawang Plantation	West Kalimantan	2023	HGU is in process
			KUD Buah Jubata	West Kalimantan	2023	Land title issue
13	PT Agro Nusa Investama (Landak)	PT Agro Nusa Investama (Landak) Mill	Agro Nusa Investama 2 (Landak), Pratama Procentindo	West Kalimantan	2023	Land title issue
14	PT Agro Palindo Sakti	PT Agro Palindo Sakti mill	Agro Palindo Sakti, Putra Indotropical, Daya Landak Plantation, Indoreshin Putra Mandiri	West Kalimantan	2023	Land title issue



**RSPO PUBLIC SUMMARY REPORT**

**Indonesia (Sumatera)**

No.	Palm Oil Mill/Estate	Mill	Estate	Location	Certification year	Status
1	PT Perkebunan Milano	PT Perkebunan Milano Mill	Sei Daun, Batang Saponggol, Merbau	North Sumatra	2009	Certified
2	PT Tania Selatan	PT Tania Selatan Mill	Burnai Timur, Burnai Barat	South Sumatra	2010	Certified
3	PT Kencana Sawit Indonesia	PT Kencana Sawit Indonesia Mill	Kencana Sawit Indonesia,	West Sumatra.	2020	Certified
			KUD SWAMATA	West Sumatera	2023	Was certified till Jun 2018; to initiate new certification at least 3 years after KSI being certified
4	PT AMP Plantation	PT AMP Plantation Mill	AMP I, AMP II, AMP III, AMP IV, Primatama Mulia Jaya, Koperasi Tompek Tapian Kandis, Koperasi AWM, Koperasi BST, Koperasi MSJ	West Sumatra	2011	Certified; KUD was certified in 2015
5	PT Buluh Cawang Plantations	PT Buluh Cawang Plantations Mill	Bumi Arjo, Dabuk Rejo, Sukamulya, Bambu Kuning	South Sumatra	2012	Certified
6	PT Gersindo Minang Plantations	PT Gersindo Minang Plantations Mill	Gersindo Minang Plantation, Permata Hijau Plantation-1, Permata Hijau Plantation-2	West Sumatra	2012	Certified
			PHP (blok 22)	West Sumatera	2023	Land title issue
7	PT Daya Labuhan Indah	PT Daya Labuhan Indah Mill	Wonosari, Sei Deras, Cabang Dua	North Sumatra	2013	Certified
8	PT Murini Sam Sam	PT Murini Sam Sam Mill	Murini Sam Sam	Riau	2015	Certified
			PT Murini Sam Sam (466 ha)	Riau	2023	Pre assessment audit, HGU issue

**RSPO PUBLIC SUMMARY REPORT**

9	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	2023	Final Audit, HGU issue
			Agro Palindo Sakti	South Sumatra	2014	Was part of APM Mill which had been closed down
10	PT Sinarsiak Dianpermai	PT Sinarsiak Dianpermai Mill	Sinarsiak DianPermai	Riau	2023	Pre assessment audit, HGU issue
11	Agrindo Indah Persada 2	Agrindo Indah Persada 2 Mill	Agro Indah Persada	Jambi	2023	HGU issue

**RSPO PUBLIC SUMMARY REPORT**

**Ghana and Nigeria**

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	NPP passed in 2019
3	Biase Plantations Limited	Calaro Estate	Calaro POM	Cross River State, Nigeria	2022	to be certified (mill construction completed) - delay from 2021 due to Covid
4	Biase Plantations Limited	Calaro Extension Estate	-	Cross River State, Nigeria	2022	to be certified (NPP completed in 2016)
5	Biase Plantations Limited	Ibiae Estate	Construction not started	Cross River State, Nigeria	2023	to be certified (NPP completed. Mill construction yet to start)
6	Eyop Industries	Ibad Estate	Construction not started	Cross River State, Nigeria	2025	to be certified (mill construction yet to start), pending clarification for NPP assessment
7	Eyop Industries	Kwa Falls	-	Cross River State, Nigeria	2025	to be certified
8	Eyop Industries	Oban	-	Cross River State, Nigeria	2025	to be certified (NPP not started), Pending clearance from government for NPP assessment