



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

File Ref. : EP09760003

RSPO PUBLIC SUMMARY REPORT

CLIENT : RIBUBONUS 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	
Ribubonus Certification Unit	Ribubonus Palm Oil Mill	5.41.20" N	117.05.34" E	Ribubonus Palm Oil Mill Lot 1A, Km 15, Jalan Labuk 90009 Sandakan, Sabah, Malaysia
	Ribubonus Estate	5.41.33" N	117.05.50" E	

MAP : See Attachment 1

AUDIT DATE : 15th to 19th November 2021 **DURATION :** 15 auditor days

TYPE OF AUDIT : Annual Surveillance Audit 1 – 2021 Recertification Audit – 2020

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 : 07/09/2015 – 06/09/2020
(extended to 6/3/2022; 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 : **DZULFIQAR BIN AZMI**
Signature :
Date : 19/03/2022 – Public Summary
14/02/2022 – Final Report

Acknowledgement by Client's Representative

Name : **Foo Siew Theng**
Signature :
Date : **23 Mar 2022**

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SUMMARY OF AUDITS

Recertification (Remote Audit)				
On-site audit date	:	29 – 30/06/2020 (REMOTE)	No. of auditor days :	3 auditor days
Audit team	:	Mohd Zulfakar Kamaruzaman (LA), Mohd Ab Raouf Asis		
No. of major NCR	:	Nil	Indicator: NA	Closing date: NA
No. of minor NCR	:	Nil	Indicator : NA	
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations	Settlers	Villagers / Local communities
		Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
		Indigenous people	Contractor	Others (Please specify)
Supply base sampled	:	Ribubonus Estate		
Changes since the last audit	:	No changes.		
Justification of audit planning	:	Remote audit allocated 3 mandays for estate and POM.		
Name of peer reviewer	:	-		
Report approved by	:	Kamini Sooriamorthy	Approval date :	-

Annual Surveillance Audit 1 (Combine with Recertification Audit)				
On-site audit date	:	15 – 19/11/2021	No. of auditor days:	15 auditor days
Audit team	:	Dzulfiqar Azmi (LA), Mohd Ab Raouf Asis, Mohd Zulfakar Kamaruzaman		
No. of major NCR	:	3	Indicator: 3.3.1, 3.4.3, 7.8.2	Closing date: 11/02/2022
No. of minor NCR	:	2	Indicator: 3.1.3, 6.7.2	
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations	Settlers	Villagers / Local communities
		✓	NA	✓
		Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
		✓	NA	NA
	Indigenous people	Contractor	Others (Please specify)	
		NA	✓	
Supply base sampled	:	Ribubonus Estate		
Changes since the last audit	:	No changes.		
Justification of audit planning	:	Allocation of mandays during onsite: 8-man days for estate and as for POM 7-man days. Combined audit RA-2020 & ASA 1-2021.		
Name of peer reviewer	:	Dr. Dzolkhifli Omar		
Report approved by	:	Kamini Sooriamorthy	Approval date:	18/03/2022

Annual Surveillance Audit 2				
On-site audit date	:		No. of auditor days :	
Audit team	:			
No. of major NCR	:		Indicator:	Closing date :
No. of minor NCR	:		Indicator :	
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations	Settlers	Villagers / Local communities
		Contract workers	Local & National	Govt. agency /
				Independent growers /

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		NGOs	Statutory bodies	Smallholders
	Indigenous people	Contractor	Others (Please specify)	
Supply base sampled :				
Changes since the last audit :				
Justification of audit planning :				
Report approved by :			Approval date :	

Annual Surveillance Audit 3				
On-site audit date :		No. of auditor days :		
Audit team :				
No. of major NCR :		Indicator:		Closing date :
No. of minor NCR :		Indicator :		
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
	Indigenous people	Contractor	Others (Please specify)	
Supply base sampled :				
Changes since the last audit :				
Justification of audit planning :				
Report approved by :			Approval date :	

Annual Surveillance Audit 4				
On-site audit date :	10-12 July 2019	No. of auditor days :		9 mandays
Audit team :	Mohd Ab Raouf bin Asis (LA), Mohd Zulfakar bin Kamaruzaman (A), Mohd Norddin bin Abdul Jalil (A).			
No. of major NCR :	1	Indicator: 4.7.3		Closing date : 10/10/2019
No. of minor NCR :	3	Indicator : 4.1.2, 6.5.3, 4.5.4 (e)		
Indicate by ticking the stakeholders interviewed during the on-site audit :	Employees	Settlers	Villagers / Local communities	Suppliers
	✓	N/A	✓	-
	Contract workers	NGOs	Govt. agency	Independent growers
	✓	-	-	N/A
Indigenous people	Contractors	Others (Please specify)		
	N/A	✓		
Supply base sampled :	Ribubonus Estate			
Justification of audit planning :	<p>The 4 days mill were for the coverage of indicators relating to; safety and health, environment, mill best practices, GHG verification and Social at Mill and 1 allocated day for Supply Chain Certification Systems.</p> <p>Similarly the audit for the Ribubonus Estate has taken 5 man-day to cover the entire indicators i.e. verification of safety and health/environment, good agriculture best practices and Social, HCV and GHG verification.</p> <p>Though both the mill and estate were located within a complex, the commuting to the complex did incurred considerable traveling time including crossing a river on a ferry. The second half of the final day has been allocated for the discussion and closing meeting. Hence the man-day required to complete the entire audit with an even sampling possible was justified.</p>			
Changes since the last audit :	No changes			
Report approved by :	Kamini a/p Sooriamoorthy		Approval date : 18/10/2019	

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SUMMARY OF INFORMATION

TABLE 1

	RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	July 2020 to Oct. 2021	Nov. 2021 to Oct. 2022			July 19 – June 20
Certified FFB Processed (MT)	96,850.24	71,944.83			73,583.00
Production of Certified CPO (MT)	20,718.779	15,827.86			16,556.18
Production of Certified PK (MT)	4,621.979	3,168.40			3,164.07
Certified Areas (Ha)	3,262.00	3,262.00			3,262.00
Planted Areas (Ha)	2,729.62	2,729.62			2,729.62
Production Areas (Ha)	2,729.62	2,729.62			2,729.62
HCV Areas / Conservation Areas (Ha)	258.42	258.42			258.42
REMARKS	-				

TABLE 2 – RA & ASA 1

	PO	PK
Last years certified volume (MT) – ASA 4 & RA	48,076.68*	9,187.11*
Last years actual certified sold (MT)	28,692.71	8,003.93
Last years actual sold under other schemes (MT)	6,969.94	0.00
Last years sold conventional (MT)	0.00	0.00
New year certified volume (MT) – ASA 1	15,827.86	3,168.40

*Extension of volumes has been applied and approved in July & Dec 2020, March, July, August and Dec 2021 as follows:
 CSPO = 16,556.18 + 4139.00 + 5173.80 + 4311.36 + 4142.00 + 4139.00 + 9,615.34 = 48,076.68MT
 CSPK = 3,164.07 + 791.00 + 988.77 + 823.85 + 791.00 + 791.00 + 1837.42 = 9187.11MT

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1.0 AUDIT PROCESS

1.1 Certification Body

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

SIRIM QAS International has vast experience in conducting audits related to RSPO certification. It has certified more than a hundred palm oil mills and several estates to ISO 14001 & ISO 45001. SIRIM QAS International has also conducted many audits for sustainable production of palm oil products against the requirements of the RSPO P&C. SIRIM QAS International was approved by the RSPO as a RSPO certification body on 21 March 2008 and re-accredited by ASI on 3 October 2019 (accredited 2014).

1.2 Qualification of audit team

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

1.3 Audit methodology

The audit was conducted combined with Recertification Audit for year 2020 (balance 70% onsite audit) and Surveillance Audit 1 for year 2021. The audit covered the Ribubonus POM and Ribubonus Estate. The sampling shall be conducted in conformance with the requirement specified in the RSPO Certification Systems Document, Nov 2020. The audit included an on-site audit to the estates, mill and settlers' houses (can be expanded) to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

1.4 Stakeholder Consultation

SIRIM QAS International had initiated the stakeholder consultation by announcing the invitation in the RSPO and SIRIM QAS International's websites in 1st October 2020. In addition, SIRIM QAS International had also sent invitations through letters to the relevant stakeholders, including government agencies and Non-Governmental Organisations (NGOs). The stakeholder consultation process is carried out during initial compliance and recertification audit only. So far, no negative feedback was received from stakeholders.

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

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Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (including migrant workers)	<p>The following were confirmed during the conduct of audit as there was no evidence to prove otherwise:</p> <ul style="list-style-type: none"> a) All workers signed the employment agreements with the estates/mill. They understood the contents of agreement, as these were prepared in English/Bahasa as the case may be. For those who couldn't read, the contents were explained to them in language they understood, usually by fellow countrymen who has worked in Malaysia longer. b) They are aware of their working hours (8 hours) and confirmed they were paid overtime for any work in excess of 8 hours. There was no forced overtime. c) They have been getting salaries above RM1,100 since January 2020 and no issues until today. Salaries were paid before the 7th of every month. d) No abuse at work, and no sexual harassment. They understand what constitutes sexual harassment. e) No discrimination between migrant workers and local workers, between male and female workers. f) Comfortable housing with water and electricity provided. g) Have access to affordable food from the canteen/sundry shops within the estate/mill premises. h) Entitled to free medical facilities at the estate clinic. i) Have representatives who attend regular meetings with the management where they can put forward any complaints and or raise any issues. They are aware of the complaints form. They have used them to complaint about house defects. j) They knew the types of work offered at the CU (mill & estates) when they were in their countries of origin. k) All migrant workers keep their own passports. <p>There was 2 NCR issued on indicator 3.3.1 and 3.4.3 (can refer to the indicator), regarding SOP on buffaloes and updating on social management plan for several issues, as highlighted during interview with workers.</p>
2) Settlers	<ul style="list-style-type: none"> ▪ Not applicable
3) Villagers / Local communities (including women representatives, displaced communities)	<ul style="list-style-type: none"> ▪ Interview with representative from Kg Malapi, Kg Gading, Kg Baba, Kg Wonod, Kg Bauto, Kg Gambaron, Kg. Ansuan, confirmed there are no land claims/disputes and no social issues. ▪ Occassionally are called to attend meetings by Ribubonus mill and estates. The last one was held few months ago. ▪ All stakeholders were invited to attend RSPO/MSPO briefings and stakeholder meetings dated in Dec 2020.
4) Suppliers	<ul style="list-style-type: none"> ▪ Suppliers confirmed that payments are received within one month of invoice. They are also aware of the complaint channel. There are no issues with the estates and mill. They receive invitations to attend stakeholder meetings dated in Dec 2020 but sometimes cannot attend.
5) Contract workers	<p>There was 1 NCR issued on indicator 3.4.3 with</p>

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	<p>regards to the contractor i.e.</p> <ul style="list-style-type: none"> ▪ Regularization of contractor workers especially for undocumented workers. ▪ Mechanism of paying the salary not more than 7th of every month for contractor workers.
6) Local & national NGOs	<ul style="list-style-type: none"> ▪ No issues
7) Government agencies / Statutory bodies	<ul style="list-style-type: none"> ▪ No issues
8) Independent growers / Smallholders	<ul style="list-style-type: none"> ▪ Interview with the external smallholder/smallgrower. ▪ No negative feedback was received.
9) Indigenous people	<ul style="list-style-type: none"> ▪ Not applicable
10) Contractor	<ul style="list-style-type: none"> ▪ Contractors confirmed that the contracts they have with the estates and mill are fair and transparent. The clauses on contract duration, amount and calculation of payments are clearly stated in their contracts. Payments are received within one month of invoice. There are no issues with the estates and mill. They receive invitations to attend stakeholder meetings but sometimes cannot attend. ▪ However, there was issues related to regularization of contractor workers especially for undocumented workers and mechanism of paying the salary not more than 7th of every month for contractor workers. Refer NCR indicator 3.4.3.
11) Previous land owner (if any)	<ul style="list-style-type: none"> ▪ After the review of the document provided, it has been verified that the land titles were previously owned by Sabah Government. The land has been sold to Ribubonus Sdn Bhd on 22/06/1998. The Land title also specified that the purpose of the planting is for oil palm cultivation for economic value.
12) Others (please specify)	<ul style="list-style-type: none"> ▪ Sundry shop informed that he allows workers to buy goods either in cash or on credit. Previously there were cases where workers absconded and left the estate/mill without paying their debts. But this is becoming less and less.

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1.5 Audit plan : Refer to Attachment 2

1.6 Date of next audit : The next surveillance audit will be conducted within 12 months but not sooner than 9 months from this audit. (For RA, the next RA will be conducted at least 4 months prior to expiry date of the certificate)

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Ribubonus Certification Unit (CU) is a subsidiary of Sabahmas Plantations Sdn. Bhd. (SPSB) which is a wholly owned company of Wilmar International Limited. The CU consists of Ribubonus Palm Oil Mill and Ribubonus Estate. The Ribubonus Palm Oil Mill (RPOM) commenced its operations in February 2008 with a processing capacity of 30 metric tonnes of fresh fruit bunches (FFB) per hour. RPOM received FFBs from the Ribubonus Estate, smallholders and small growers.

RPOM and Ribubonus Estate are located in Sandakan District, Sabah, Malaysia. Ribubonus Estate can be accessed by using the Sandakan – Telupid Road and about 157 km from Sandakan. Ribubonus CU is bordered by agricultural land on the northwestern boundary separating it from Ulu Tungud Forest Reserve. The Bukit Kuamas Forest Reserve borders the eastern portion of the estate with Kg. Wonod and Twin Acre Plantation located at the southern side. The Labuk River passes through the western boundary of this CU. The Ribubonus POM also holds the certificate for ISCC and ISO 22000.

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

Ribubonus POM received FFBs from the Ribubonus Estate, smallholders and small growers. 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 period from July 2019 to June 2020 & July 2020 to October 2021

Supply Based	FFB Production (July 2019 to June 2020)		FFB Production (July 2020 to October 2021)		Certifying CB
	Total Mt	Percentage (%)	Total Mt	Percentage (%)	
Ribubonus Estate	74,568.48	42.82	96,855.50	48.82	SIRIM QAS
Outsiders	99,566.31	57.18	101,537.60	51.18	Third parties (non-certified)
Grand Total	174,134.79	100.00	198,393.10	100.00	

**Table 2: Projected FFB production by the supply base for the next reporting period
November 2021 to October 2022**

Supply Based	FFB Contribution		Certifying CB
	Total Mt	Percentage (%)	
Ribubonus Estate	71,944.83	47.12	SIRIM QAS
Outsiders	80,726.67	52.88	Third parties (non-certified)
Grand Total	152,671.50	100.00	

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Table 3: Actual FFB received and CPO & PK dispatch by Ribubonus POM for period from July 2019 to June 2020 & July 2020 to October 2021

RSPO Supply Chain Model: Mass Balance	July 2019 to June 2020 (ASA3)	July 2020 to October 2021 (ASA4)	Total (MT)
FFB Received	174,134.79	198,393.10	372,527.89
FFB Processed	174,134.79	198,393.10	372,527.89
Certified FFB Processed	74,568.48	96,855.50	171,423.98
Non-certified FFB Processed	99,566.31	101,537.60	201,103.91
Crude Palm Oil (CPO)			
Overall CPO Production	38,432.31	41,648.15	80,080.46
Certified CPO Production	16,320.28	20,315.84	36,636.12
Certified CPO delivered as RSPO	8,967.40	19,725.31	28,692.71
Certified CPO delivered as non-RSPO	0.00	0.00	0.00
Certified CPO delivered under other sustainable schemes	6,969.94	0.00	6,969.94
Palm Kernel (PK)			
Overall PK Production	8,415.76	9,458.52	17,874.28
Certified PK Production	3,602.40	4,621.97	8,224.37
Certified PK delivered as RSPO	3,575.55	4,428.38	8,003.93
Certified PK delivered as non-RSPO	0.00	0.00	0.00
Certified CPO delivered under other sustainable schemes	0.00	0.00	0.00
Credit traded under Book & Claim	0.00	0.00	0.00

Table 4: Projected FFB received and CPO & PK dispatch by Ribubonus POM of next reporting period November 2021 to October 2022

RSPO Supply Chain Model: Mass Balance	Total (MT)
FFB Received	152,671.50
FFB Processed	152,671.50
Certified FFB Processed	71,944.83
Certified CPO Production	15,827.86
Certified PK Production	3,168.40

Table 5 Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Ribubonus Estate	2,729.62	3,262.00
Total	2,729.62	3,262.00

Table 6: Planting profile for Ribubonus CU

Estate	Year of planting	Planting Cycle	Mature (Ha)	Immature (Ha)	Planted area	% of planted area mature	% of planted area immature
Ribubonus	2000	1st	219.08	0.00	219.08	8.03	0.00
	2001	1st	1,533.39	0.00	1,533.39	56.18	0.00
	2002	1st	944.78	0.00	944.78	34.61	0.00
	2007	1st	17.85	0.00	17.85	0.65	0.00
	2009	1st	14.52	0.00	14.52	0.53	0.00
Total			2,729.62	0.00	2,729.62	100.00	0.00

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2.3 Organizational Information/Contact Person(s)

The details of the contact person are as shown below:

Name	:	A. Agus Bin Mallaroan
Position	:	Group Manager
Address	:	PPB Oil Palms Berhad, Locked Bag 34,90009 Sandakan.
Phone no.	:	019-8978280
Fax no.	:	NA
Email	:	agus.mallaroan@my.wilmar-intl.com

3.0 AUDIT FINDINGS

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

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

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

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

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

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

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

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

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 NA

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

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

No changes so far.

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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 negative feedback or comment was received during onsite audit.

4.0 DETAILS OF NON-CONFORMITY REPORT

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

Total no. of minor NCR(s) List : 2 3.1.3, 6.7.2
(details refer to Attachment 4)

Total no. of major NCR(s) List : 3 3.3.1, 3.4.3, 7.8.2
(details refer to Attachment 4)

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

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

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

5.0 AUDIT CONCLUSION

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

6.0 RECOMMENDATION

No NCR recorded. Recommended to continue certification.

Minor NCR(s) recorded. Corrective action plan has been accepted. Verification of the NCR(s) to be carried out in the next audit.
Note: Minor NCRs raised in the audit which are not addressed in the subsequent audit shall be upgraded to major NCRs .

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

Recommended to continue certification.

Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s)..... have not been satisfactorily closed out within 60 days of the audit. Recommended for suspension of the certificate.
Note: Major NCRs which are not addressed within a further 60 days shall result in the certificate being withdrawn.

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

Audit Team Leader :

DZULFIQAR AZMI



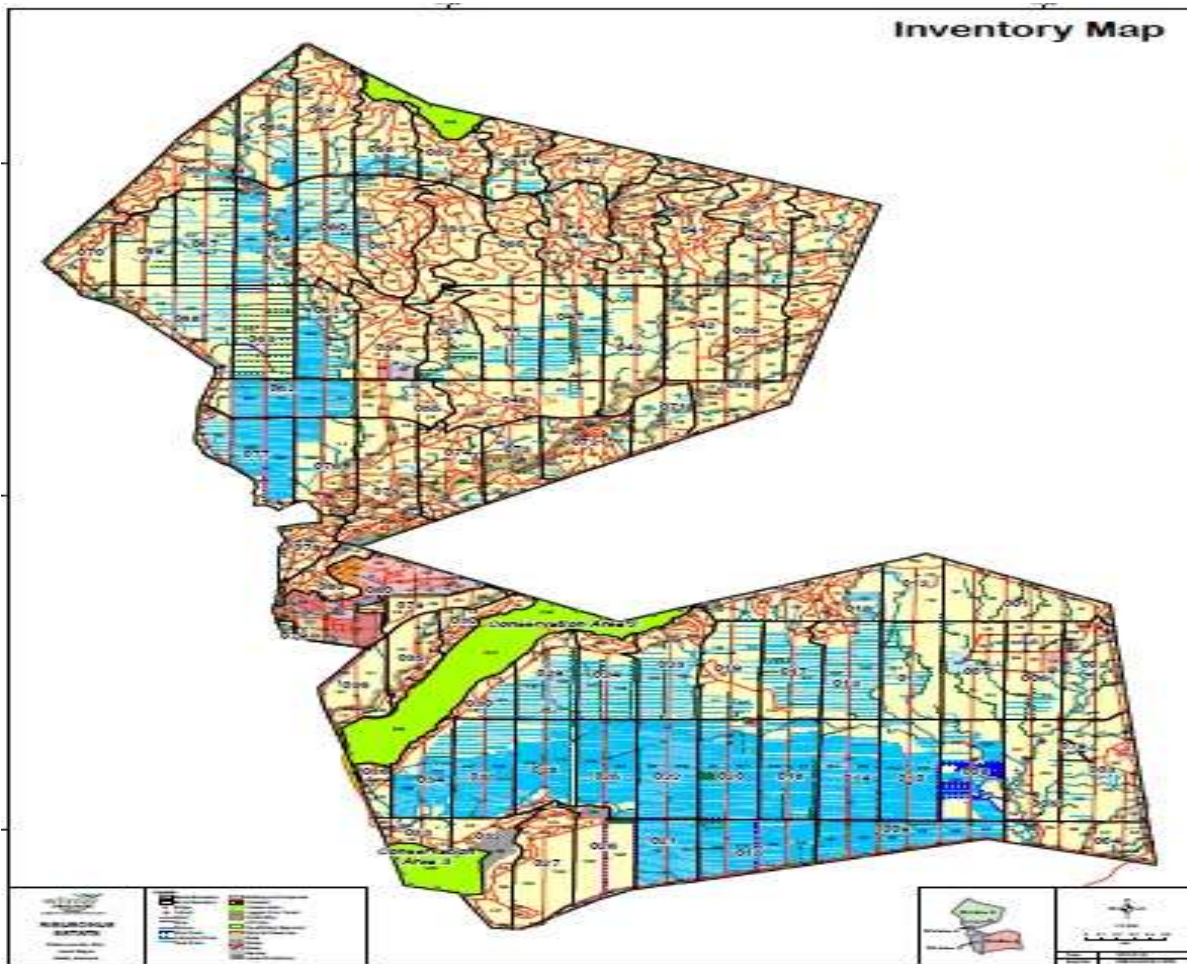
11 / 02 / 2022

(Name)

(Signature)

(Date)

Map of Ribubonus CU



Attachment 2 – Audit Plan

RSPO MYNI 2019 Recertification and Surveillance 1 Audit Plan

1. Objectives

The objectives of the audit are as follows:

- (i) To determine Certification Unit conformance against the relevant certification standards.
- (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 : 15th to 19th November 2021

3. Site of assessment : Ribubonus Certification Unit
1) Ribubonus Palm Oil Mill
2) Ribubonus Estate

4. Reference Standard:

- a. MYNI 2019 of RSPO P&C 2018 / RSPO Independent Smallholder Standard, Nov 2019 / RSPO Management System Requirements and Guidance for Group Certification of FFB Production, March 2018
- b. RSPO Certification System Documents
- c. Company's audit criteria including Company's Manual/Procedures

5. Assessment Team

Lead Auditor : Dzulfiqar Azmi (GAP, Safety, Environmental)
Auditor : Mohd Ab Raouf Asis (Social - Internal)
Mohd Zulfakar Kamaruzaman (SCCS, Social - External, HCV, TPB)

Observer : N.A.

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

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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. RSPO 2018 Principles and Criteria (P&C) Metrics Template

The RSPO 2018 Principles and Criteria (P&C) Metrics Template outlines a set of strategic outcome-based metrics relating directly to the RSPO P&C and is aligned with the RSPO Theory of Change. This Metrics Template comes into effect on 1 June 2021 and all audits against the 2018 P&C or the relevant National Interpretation conducted from 1 June 2021 onwards shall prepare and submit this Metrics Template for the audit team to review during audit.

Please submit the Metrics Template to Lead Auditor according to this period:

- a) Reporting time frames for economic data are:
 - i. Calendar year (January to December): January 2020 to December 2020, and
 - ii. 12-month period counting up to one months before audit month: Oct. 2020 to Sep. 2021
- b) Reporting time frames for demographic data:
 - i. For mill and estate workers: as of 31 December 2020
 - ii. For smallholders and outgrowers: January 2020 to December 2020
- c) Reporting time frame for all other social and environmental data:
 - i. January 2020 to December 2020

The updated Metrics Template (as attached, the version 2.0) will be enforced from 1 August 2021. All audits conducted from 1 August 2021 onwards must use the updated Metrics Template (version 2.0).

14. Assessment Programme Details : As below

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DETAILS OF AUDIT PLAN

Day One: 15/11/2021 (Monday)

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

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Day Two: 16/11/2021 (Tuesday)

Time	Activities / areas to be visited	Auditee	
9.00 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at Ribubonus POM	Management Representative	
9.15 am	To assign each audit team members – site and the P&C requirements		
	Dzul	Raouf	
	<p>Coverage of assessment: P1, P2, P3, P6, P7:</p> <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings. ▪ Laws and regulations ▪ Waste management including disposal site ▪ Aspects/impacts of mill management ▪ Safety & Health practice – witness activities at site ▪ Hazard identification and Risk Management ▪ Chemical management ▪ Chemical/ fertilizer store, workshop ▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) ▪ Controlled/open burning ▪ Pollution mitigating plans ▪ River system and Water bodies ▪ Management and disposal of waste including pesticides containers ▪ Training and skill development programs ▪ Mill Best Practice ▪ Continuous improvement <p>Other area identified during the assessment</p>	<p>Coverage of assessment: P1, P2, P4, P5, P7:</p> <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. ▪ Interview with Union representatives ▪ Interview with gender committee, worker representative, contractors, supplier, etc ▪ Workers Issues ▪ Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, provision shop & etc) ▪ Continuous improvement <p>Other area identified during the assessment</p>	<p>Coverage of assessment: P1, P2, P3, P6, P7:</p> <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Consultation with relevant government agencies ▪ Local communities and stakeholders ▪ Local sustainable development ▪ Support smallholder inclusion ▪ Complaints and grievances ▪ Mill Boundary, adjacent and neighbouring land use ▪ Continuous improvement <p>Other area identified during the assessment</p>
12.30 pm	LUNCH BREAK & ZUHUR PRAYER		
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records		
5.00 pm	Audit team discussion / Interim closing / End of Day 2 audit		
9.00pm	Discussion LA and teams on potential NCRs		

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Day Three: 17/11/2021 (Wednesday)

Time	Activities / areas to be visited	Auditee
9.00 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at Ribubonus Estate	Management Representative
9.15 am	To assign each audit team members – site and the P&C requirements	
	Dzul	Raouf
	<p>Coverage of assessment: P1, P2, P3, P6, P7:</p> <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Waste management including disposal site ▪ Aspects/impacts of estate management ▪ Safety & Health practice – witness activities at site ▪ Hazard identification and Risk Management ▪ Chemical management ▪ Chemical/ fertilizer store, workshop ▪ Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc) ▪ Controlled/open burning ▪ Pollution mitigating plans ▪ River system and Water bodies ▪ Management and disposal of waste including pesticides containers ▪ Training and skill development programs ▪ New planting ▪ Controlled/open burning ▪ Continuous improvement <p>Other area identified during the assessment</p>	<p>Coverage of assessment: P1, P2, P4, P5, P7:</p> <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. ▪ Interview with Union representatives ▪ Interview with gender committee, worker representative, contractors, supplier, etc ▪ Workers Issues ▪ Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, provision shop & etc) ▪ Continuous improvement <p>Other area identified during the assessment</p>
	Zulfakar	
	<p>Coverage of assessment: P1, P2, P3, P6, P7:</p> <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Consultation with relevant government agencies ▪ Local communities and stakeholders ▪ Local sustainable development ▪ Support smallholder inclusion ▪ Complaints and grievances ▪ Inspection of protected sites with HCV attributes ▪ Forested area ▪ Plantation Boundary, adjacent and neighbouring land use ▪ Continuous improvement ▪ Time Bound Plan <p>Other area identified during the assessment</p>	
12.30 pm	LUNCH BREAK & ZUHUR PRAYER	
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records	
5.00 pm	Audit team discussion / Interim closing / End of Day 3 audit	
9.00pm	Discussion LA and teams on potential NCRs	

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Day Four: 18/11/2021 (Thursday)

Time	Activities / areas to be visited	Auditee
9.00 am	Overview of current activities of CU by audit team & Logistics discussion to the sites to be visited at Ribubonus Estate	Management Representative
9.15 am	To assign each audit team members – site and the P&C requirements	
	Dzul	Raouf
	<p>Coverage of assessment: P1, P2, P3, P6, P7:</p> <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Commitment to long-term economic and financial viability ▪ Good Agricultural Practice- witness activities at site (weeding/ spraying, etc) ▪ EFB mulching, POME application ▪ Nursery (if any) ▪ Plantation on hilly/swampy area ▪ IPM implementation, training and safe use of agro-chemicals. ▪ Waste management including disposal site ▪ Aspects/impacts of estate management ▪ Safety & Health practice – witness activities at site ▪ Hazard identification and Risk Management ▪ Chemical management ▪ Controlled/open burning ▪ Pollution mitigating plans ▪ River system and Water bodies ▪ Management and disposal of waste including pesticides containers ▪ Training and skill development programs ▪ New planting ▪ Controlled/open burning ▪ Continuous improvement <p>Other area identified during the assessment</p>	<p>Coverage of assessment: P1, P2, P4, P5, P7:</p> <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Discussion with relevant management (CSR, community affairs) and view documentation such as SIA, assessment and management plans. ▪ Interview with Union representatives ▪ Interview with gender committee, worker representative, contractors, supplier, etc ▪ Workers Issues ▪ Facilities provided at line site (i.e. mosque, surau, community center, GPW, Tadika, provision shop & etc) ▪ Continuous improvement <p>Other area identified during the assessment</p>
	Zulfakar	
	<p>Coverage of assessment: P1, P2, P3, P6, P7:</p> <ul style="list-style-type: none"> ▪ Follow up from previous assessment findings ▪ Laws and regulations ▪ Consultation with relevant government agencies ▪ Local communities and stakeholders ▪ Local sustainable development ▪ Support smallholder inclusion ▪ Complaints and grievances ▪ Inspection of protected sites with HCV attributes ▪ Forested area ▪ Plantation Boundary, adjacent and neighbouring land use ▪ Continuous improvement ▪ Time Bound Plan <p>Other area identified during the assessment</p>	
12.30 pm	LUNCH BREAK & ZUHUR PRAYER	
1.30 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records	
5.00 pm	Audit team discussion / Interim closing / End of Day 4 audit	
9.00pm	Discussion LA and teams on potential NCRs	

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Day Five: 19/11/2021 (Friday)

Time	Activities / areas to be visited			Auditee
9.00 am	To assign each audit team members – site and the P&C requirements			
	Dzul	Raouf	Zulfakar	
	Coverage of assessment: P1, P2, P3, P6, P7: Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records	Coverage of assessment: P1, P2, P4, P5, P7: Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records	Coverage of assessment: P1, P2, P3, P6, P7: Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records	
12.30 pm	LUNCH BREAK & FRIDAY PRAYER			
2.00 pm	Continue assessment / Verification on outstanding issues / Auditor to inform auditee on the required document / records			
3.00 pm	Verification on outstanding issues for CU Auditor to inform auditee on the required document / records Continue Audit Team discussion and preparation of assessment findings.			
3.30 pm	Discussion and acceptance on assessment findings with Management Representative and visited site Plantation / Scheme Manager			
4.00 pm	Closing meeting at CU / End of audit			

Note: This audit plan is subject to change whenever necessary, and the Client's representative will be informed of any

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Attachment 3

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

Principle 1: Behave ethically and transparently

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

Clause	Indicators	Comply Yes/No	Findings
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	YES	Ribubonus CU continued to maintain a comprehensive system with respect to this criterion. Request Forms were available for stakeholders or interested party to obtain information related to RSPO. Records of visit by the Government agencies were also established. Ribubonus CU also continued to implement the procedure for responding to any communication as outlined in their RSPO System procedure – RSPO 6.2 Item 6.1 for Internal Communications & 6.2 for External Communication. The procedure required the appointed person-in-charge to respond to all communication within a specified time frame. In addition, Ribubonus CU adopted a Communications Policy dated September 2010 signed by The Chairman and Chief Executive Officer. This Policy has included guidelines on an effective management and communication of the company's information to for its stakeholders/external parties.
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	The CU continued to use their website for disseminating public information. Information relating to land titles, policies, environmental, social and/or legal, complaints and grievances are available at http://www.wilmar-international.com
	1.1.3 (C) Records of requests for information and responses are maintained.	YES	The Ribubonus CU continued to maintain the records of requests for information and responses are maintained which included the government agencies, schools, local communities. Management documents relating to environment, social and legal issues, were available to the public except for those prevented by commercial confidential or where disclosure of information would result in negative environmental or social outcomes. 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	The CU has continued to use the internal communication through morning assemblies, notice boards and posters, suggestion boxes and complaint forms. External communication has been mainly through mail correspondence. The CU has also used the Stakeholders Meeting to serve as a forum to discuss issues of interest to the mills, estates, local government agencies and local communities (villagers). Generally, the CU has complied with its procedures in responding to internal and external communications. Evidence of compliance can be observed in the various files of correspondence, particularly with government agencies.

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Clause	Indicators	Comply Yes/No	Findings
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	YES	List of stakeholders last updated in Oct 2021. The stakeholder list comprises of neighboring estates, smallholders, approved suppliers of services and consumable, government agencies and NGO's associations.
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	Ribubonus CU is bound by Wilmar International Limited's written Code of Ethics and Code of Conduct policies both dated 1 September 2017. Both policies commit to a code of ethical conduct and integrity in all operations and transactions and were available and sighted during the audit. The Code of Conduct comprises 3 main principles, name avoiding conflict of interest, avoiding misuse and/or abuse of position, and ensuring confidentiality of information and preventing misuse of information. The Code of Ethics prescribes the moral and ethical standard of behavior that is expected of all Employees. All business operations and transactions, including recruitment and contracts have signed and agreed on the letter agreement where ethical conduct has outlined in the agreement. It is also being explained during the induction course for the newly arrived workers.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	YES	A system to monitor compliance is available. All written agreements known as "Akur Janji dan Persetujuan Bersama" was sampled at Ribubonus CU contain a clause on no child [para i], forced and trafficked labour [para ii]. The overall ethical business practice was regularly monitored through the internal audit conducted by the sustainability team. Based on the Code of Business Conduct, it explains where to get guidance, raising a concern or reporting a violation. This information has been briefed to the worker during morning muster and internal/external stakeholder meeting.

Principle 2: Operate legally and respect rights

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

Clause	Indicators	Comply Yes/No	Findings
2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1 (C) The unit of certification complies with applicable legal requirements.	YES	It was evident that Ribubonus CU continue to comply with most of the applicable laws and regulations.
	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 Ribubonus CU. 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 (e.g., MPOA, EMPA, SECA, etc.), attending seminar/conference, buying of the law books, government agencies websites, etc.
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained,	YES	Physical markers were located and visibly maintained along the legal boundaries particularly adjacent to state land, neighbouring private oil palm estates. A boundary stone

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Clause	Indicators	Comply Yes/No	Findings
	and there is no planting beyond these legal or authorised boundaries.		map of the whole estate by Wilmar Survey Department was available. It had boundary marking number with latitude and longitude references.
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 is maintained by 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.	YES	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, Clause 10 of the contracts contain a provision that the contractor shall comply with the provisions of the relevant Acts, regulations and by-laws. Legal due diligence is carried out by the Contracts Department at Wilmar HQ in Sandakan. This include obtaining the contractors' registered company names and addresses, contact numbers, evidence of company registration, details of contractors' principle activities, authorised and paid-up capital, list of shareholders, board of directors, bank details, financial auditors, and current trading/business licenses.
	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	Several contracts sampled at Ribubonus CU contain a clause on no child, forced and trafficked labour. This is stipulated under Clause 8 of the Agreements which states that the Contractor warrants that it shall not use or promote use of child labour, forced, bonded labour or human trafficking.
2.3 All FFB supplies from outside the unit of certification are from legal sources.	2.3.1 (C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> Information on geo-location of FFB origins. Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder One or more supporting documents for claims Valid MPOB license 	YES	Sighted record at Ribubonus POM for the directly source of FFB in the file Summary of Geo Location for FFB Supplier there is record: <ol style="list-style-type: none"> Information on geo-location of FFB origins (latitude longitude) of the Outside Supplier. Maps of Location all the Outside FFB Suppliers Evidence of the ownership status or the right/claim to the land, Sighted the LA and some of them their Land Title All OCP valid MPOB license The evidence of currently document is available in the 'Summary of Geo Location for FFB Supplier. At present the mill only possessed the valid MPOB licenses for all the directly source FFB as verified by the auditor.
	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 Ribubonus POM there is no practice of indirectly source of FFB. All FFB are received direct from the suppliers.

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

Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.	3.1.1 (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	YES	Ribubonus Estate continued to be committed to long-term economic and financial viability. The Estates had management plans in their current year's budgets and projections. The annual budgets and projections were prepared on an annual basis before the end of current year. The yearly budget and projections where the cost of production was reviewed annually and compared against expenditure for each year was an on-going process. The parameters monitored remained essentially unchanged and included Capital (CAPEX) and Operating costs. The operating expenditure included expenditure for Replanting, Mature and Immature Oil Palm upkeep, Administration cost, Housing and Machinery upkeep, allocation for sustainability implementation (environmental, social, occupational safety and health), infrastructure development (roads, etc.), and training etc.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	The annual replanting programme for Ribubonus Estate was projected for a minimum of five years with yearly review and was made available for review during audit.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	NO	The management review meeting for Ribubonus CU which were held in Oct 2021 at POM and attended by estate/mill managers and his teams. It was chaired by Estate/Mill managers. The management review was discussed mainly for results of internal audits only. However, several scale and nature of the activities undertaken yet to be discussed: <ol style="list-style-type: none"> 1. Customer (internal/external) feedback 2. Process performance and product conformity 3. Status of preventive and corrective actions 4. Follow-up actions from management reviews 5. Changes that could affect the management system 6. Recommendations for improvement Furthermore, the Audit Notes and Audit Report was not made available for Ribubonus CU during the external audit process. <i>As a result, Minor NCR DA 01 2021 was raised.</i>
3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	YES	It was evident that the CIPs were implemented, based on consideration of the main social and environmental impacts and opportunities of the CU.
	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics	YES	The monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.

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Clause	Indicators	Comply Yes/No	Findings
plans that allow demonstrable continuous improvement in key operations.	template.		
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.	NO	Standard Operating Procedures (SOP) for certain operations was not in place i.e. for buffalo ownership in Ribubonus Estate. The buffalo was in conjunction with harvesting system in the estate and the ownership and maintenance of the buffalo was not clearly stated or not established in any procedure. Based on interview with workers, there some grievances with current system which they have to sell the buffalo themselves if they want to apply for vacation leave or repatriated. Furthermore, monthly maintenance of the buffalo i.e. salt, insect sprayer, rope and carrier is currently higher than the allowance they get. <i>Therefore, Major NCR MAR 01 2021 was raised.</i>
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	YES	Plantation Head, General Manager (Estates & POM), AGM (Estates & POM), Group Manager (Estates & POM), Mill Support Team, Safety & Sustainability Team and Eco Management Unit (EMU) to inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements. Operating units visited maintain all records of monitoring and available for review and checklists were available and being used by the estates and mill for operations, health and safety monitoring, workers' welfare and environmental issues.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	YES	Plantation Head, General Manager (Estates & POM), AGM (Estates & POM), Group Manager (Estates & POM), Mill Support Team, Safety & Sustainability Team and Eco Management Unit (EMU) to inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements. Operating units visited maintain all records of monitoring and available for review. checklists were available and being used by the estates and mill for operations, health and safety monitoring, workers' welfare and environmental issues.
3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	YES	There was no new planting in Ribubonus CU. Environmental Aspect and Impact (EAI) and Social Impact Assessment (SIA) was conducted internally considering activities associated to estate and mill operations.
	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	YES	For Ribubonus CU, the SIA and EAI reports are separated. Significant Environmental Aspect and Impact (EAI) mitigation methods was implemented from EAI Evaluation Form. Those activities evaluated as significant were then monitored using the management control and mitigation measure established for each activity where the significant impacts occurred. The

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Clause	Indicators	Comply Yes/No	Findings
monitoring plan is implemented and regularly updated in ongoing operations.	affected stakeholders.		EAI assessments had included the identification of aspects and impacts from resulting from the POM and estate operations. This assessment was conducted with full consultation with all the 3 communities living within the vicinity of the estates. In the SIA reports, records of meetings with stakeholders including types of stakeholders, target groups and dates of consultations were documented.
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	NO	<p>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.</p> <p>The SIA Management Action Plan was reviewed in Feb 2020 (Mill) and June 20202 (Estate) after stakeholders meeting with the affected parties in Dec 2019 and attended by local communities. Stakeholders meeting were held by the Ribubonus CU to get inputs for reviewing and updating the SIA Management Action Plan 2020.</p> <p>However, social management and monitoring plan was not reviewed and updated for certain issues identified in the CU i.e.:</p> <ol style="list-style-type: none"> 1. Salary payment through bank instead of issuance cheque and the particular cheque will cash out at sundry shop in the estate. Based on interview held with local workers, they most prefer their salary to bank in through bank, to prevent charges from the shop. Furthermore, easy for them to make online transactions to pay their debt or loan because no cash deposit nearby the CU. 2. Regularization of contractor workers especially for undocumented workers. 3. Mechanism of paying the salary not more than 7th of every month for contractor workers. <p><i>Therefore, Major NCR was issued, as MAR 02 2021.</i></p>
3.5 A system for managing human resources is in place.	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.	YES	There were several documents related to employment procedures, whether local or foreign as follows: Recruitment of workers, Recruitment, selection, hiring and promotion, Guaranteed Week and Working On Rest Day & Public Holiday, and 'Tatacara Disiplin dan Pemberhenian Pekerja". For matters related to termination of employment and retirement, these are contained in employment contracts. Clause 2 of the employment contract states that retirement age for workers is 60. These documents are available to workers and their representatives.
	3.5.2 Employment procedures are implemented, and records are maintained.	YES	Based on interview and documentation review, the employee well understands on the employment procedures.
3.6 An occupational health and safety (H&S) plan is	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	YES	The hazard identification, risk assessment and risk control (HIRARC) procedure has been established. Ribubonus CU have conducted the risk assessment on all its operation as well as determining their control measures.

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Clause	Indicators	Comply Yes/No	Findings
documented, effectively communicated and implemented.	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 Ribubonus 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, medical surveillance, audiometric test, use of PPE, OSH Committee meetings, etc. Generally, the OSH plans 2021 were acceptable. Sighted several safety trainings was conducted by the mill & estate management.
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.	YES	The documented programme provides training was in place and 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 was verified and checked.
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	YES	The training for year 2021 was conducted in Sept 2021, attended by 20 person including PIC, Clerk, Assistant Engineer, Staff and Weighbridge Operator. Attendance list & photograph was made available. The training for contractors were carried out in Oct 2021.

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	YES	Not applicable since this mill is Mass Balance.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	a mill process certified and uncertified FFB without physically separating them, the inly MB Module is applicable.		
3.8.2	<p>Mass balance Module</p> <p>A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base.</p>	YES	Ribubonus POM had continued received FFB supply from own company estate namely Ribubonus estate and Outsider Crop consist of 12 Grower and 48 Smallholder. Thus, Ribubonus POM has qualifies for the Mass Balance chain system and 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. Details as in Table 3 of this report.
3.8.3	<p>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.</p>	YES	Projection data available as in Table 4: Projected FFB received and CPO & PK dispatch by Ribubonus POM of next reporting period November 2021 to October 2022.
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).</p>	YES	<p>The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. The registration information were: RSPO membership no: 2-0017-05-000-00 Registered under parent company: WILMAR INTERNATIONAL LIMITED Register under name: Ribubonus POM</p>
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"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). • Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard. 	YES	<p>Ribubonus POM procedure describing the procedures on the following activities related on its supply chain certification standard required by the RSPO. The Procedure was sighted and found all elements were covered which included:</p> <ul style="list-style-type: none"> - Mill Supply Chain Definition - Management Representative - Internal Audit - Purchasing and Goods In (including receiving and processing certified and non-certified FFBs) - Sales and Goods Out - Despatch - Outsourcing - Record Keeping - Registration of Transactions - Claims - Training

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<ul style="list-style-type: none"> The site shall have documented procedures for receiving and processing certified and non-certified FFBs. 		<ul style="list-style-type: none"> - Complaints Procedure - Management Review - Supply Chain Model – Mass Balance - GHG Tabulation for RSPO Certified Palm Oil Mill - Appendix A <ul style="list-style-type: none"> ▪ Chief Clerk has overall responsible and authority over the implementation of RSPO supply chain requirement in RSPO Ribubonus POM. Interview with sustainability committee member, mill manager, assistant mill manager & weighbridge operator was confirmed they are understood the supply chain requirements. ▪ The Training for year 2021 was conducted in Sept 2021, attended by 20 person including PIC, Clerk, Assistant Engineer, Staff and Weighbridge Operator. Attendance list & photograph was seen.
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"> Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. Effectively implements and maintains the standard requirements within its organisation. Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non- conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports. 	YES	<p>As describe under [RPOM-RSPO-SCC], RPOM which is follow the RSPO Supply Chain Certification Standard Revision 2017 requirements. Audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard Revision 2017 requirements.</p> <p>RSPO internal audit for 2021 was conducted in Sep 2021 by the internal auditor team and the internal audit has followed the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. There are 0 Minor NCR for Both Internal Auditor were raised by auditor. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor.</p>
3.8.7	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</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>Ribubonus POM had continued received FFB supply from own company estate namely Ribubonus estate and Outsider Crop consist of 11 Grower and 33 Smallholder. The validity of the certificate of the supplier has been checked accordingly. Among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight, quantity, unique identification number. Monitoring records titled as “RSPO & MSPO Mass Balance” has recorded the tonnage of certified FFB and its supplying estate.</p>

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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 min info 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"> a) The name and address of buyer; b) The name and address of the seller c) The leading or shipment/delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation i) A unique identification number 	YES	<p>Documented procedures related to sales and goods out were sighted and found adequate. All the following were available:</p> <ul style="list-style-type: none"> • The name and address of buyer; • The name and address of the seller • The leading or shipment/delivery date; • The date on which the documents were issued; • RSPO certificate number; • A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation • A unique identification number
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> (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 actvt), the mill holding the certificate shall ensure that the independent third party complies with relevant req of this RSPO SC Cert. (ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes 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. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. 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. 	YES	<ul style="list-style-type: none"> a) There are 1 outsource company CPO and PK transporter with agreement signed in May 2020. b) There is contract document between Ribubonus POM and the transporters. Sighted in the Clause no 8 stated that the contractor agrees that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. c) The RSPO Supply Chain procedure has described and briefed to the contractor in Oct 2021. d) There is contract document between Ribubonus POM and the transporters. Sighted in the Clause no 8 stated that the contractor agrees that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
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. Sighted Stakeholder list dated 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	No new contractors used and will be used in the future for the processing or production of RSPO certified materials.
3.8.12	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. Relevant record was maintained for more than 2 years as per Standard operating RPOM-RSPO-SCC.
	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	
	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	Ribubonus POM has maintained the Real Time basis accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK. Record titled as <i>“RSPO & MSPO Mass Balance”</i>
	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	Ribubonus POM had continued to keep record and balances of all receipts of RSPO-certified FFBs and deliveries of RSPO-certified CPO and PK on a three-monthly basis in the table <i>‘RSPO & MSPO Mass Balance’</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 determine and set their own extraction rates based upon past experience, documented and applied it consistently.	YES	Ribubonus 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).

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	YES	These figures were monitored on daily & monthly basis by the mill using the prepared template (e.g. Monthly Production Report – Physical Movement) to ensure their accuracy as well as monitoring of their ongoing performance.
3.8.15	Processing 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.	YES	Not Applicable since this mill is MB Mill
3.8.16	Registration of Transactions 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. 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	YES	Documented procedures related to sales and goods out were sighted and found adequate. The requirement of sales & goods out especially on notation of applicable Supply Chain model & Certificate number being complied by indicating in weighbridge dispatch ticket. The registration of transaction being carried out by Group Plantation Marketing subordinate using the RSPO Member ID of RSPO_ PO1000002706 Mill receives copy of transaction input to the system on monthly basis based on contract summary (buyer weight being put in).
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	YES	Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. Ribubonus POM has not use RSPO corporate logo as well as trademark logo.

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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 1 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 1 Feb 2018 also aims to protect whistle blowers from reprisals or victimisation. Based on records available, the policies were communicated accordingly.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	YES	There is no evidence that Ribubonus CU instigates any violence or use any form of harassment including the use of mercenaries and paramilitaries in its operations. This was confirmed from Auditor's interviews with employees from all levels (staff, workers, security personnel) and consultations held with local FFB Suppliers and local communities. There was no issue regarding user rights and conflicts between local communities and other stakeholders with Ribubonus 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	The system used by the Ribubonus CU in resolving disputes and grievances exists in the procedure called "Dispute & Resolution Procedure", "Flowchart of Conflict Resolution" were recorded as sighted in 'Request Form File' at POM and Ribubonus Estate. Most recorded complaints were from workers regarding requests for house repairs as recorded in 'Request Form' maintained at all Estates and POM. Most complaints were resolved within 2 to 7 days, depending on the complication of the case. In some cases, some delays were noted. All the complaints forms sighted contain sections for complainants to fill up their names, and in some forms, their job and address. and there is evidence that the complaints were resolved in a timely and appropriate manner. Personnel had been appointed at all Estate and Mill for handling grievance/complaints and social issues as evidenced by sighted appointment letters and established.
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	YES	The Ribubonus CU maintained affirms that its dispute system is open to any affected parties. Relevant policy titled 'Whistleblowing Policy', "No Deforestation, No Peat, No Exploitation Policy" and Procedure namely "Dispute & Resolution Procedure", "Flowchart of Conflict Resolution" were available. In accordance with the procedure, the anonymity of complainants and whistle-blowers will not be revealed to third parties. The documented system in dealing with complaints and grievances are briefed during muster briefing and Induction training.

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Clause	Indicators	Comply Yes/No	Findings
	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	Ribubonus CU keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders through stakeholders meeting.
	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 system used by the Ribubonus CU in resolving disputes and grievances exists in the Relevant policy titled "Whistleblowing Policy", " <i>No Deforestation, No Peat, No Exploitation Policy</i> " and Procedure namely "Dispute & Resolution Procedure", "Flowchart of Conflict Resolution". The Mill and Estates within Ribubonus CU each have its own Internal Complaint Book/Form and External Communication Book/Form. Forms were provided for grievance and complaints from stakeholders. In accordance with the procedure, the anonymity of complainants and whistle-blowers will not be revealed to third parties.
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	There is evidence that contributions to community development was provided based on consultations.
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	After the review of the document provided, it has been verified that the land titles were previously owned by Sabah Government. a) The land has been sold to Ribubonus Sdn Bhd on 22/6/98. The Land title also specified that the purpose of the planting is for oil palm cultivation for economic value. b) It can be confirmed that Ribubonus Sdn Bhd maintained and complied with the terms of the land title. c) The land title for Ribubonus is country lease. The following land titles were available at the Mill and estate office.
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Ribubonus CU. The audit team had confirmed that there were no land issues related to previous owners.

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Clause	Indicators	Comply Yes/No	Findings
	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 audit team has also interviewed with local FFB Suppliers and local communities and from the interviews, it can be concluded that there was no evidence of any land disputes between local communities and at Ribubonus CU.
	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.	YES	
	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	YES	
	4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Ribubonus CU. The audit team had confirmed that there were no land issues related to previous owners. The audit team has also interviewed with local FFB Suppliers and local and from the interviews, it can be concluded that there was no evidence of any land disputes between local communities and at Ribubonus CU.

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Clause	Indicators	Comply Yes/No	Findings
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	YES	The requirement in this indicator does not apply to Ribubonus CU.
	4.4.5 (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	YES	The requirement in this indicator does not apply to Ribubonus CU.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	YES	The requirement in this indicator does not apply to Ribubonus CU.
4.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.	4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	YES	Based on Social Impact Assessment (SIA) Report for Ribubonus CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Ribubonus and the audit team had confirmed that there were no land issues related to previous owners. The audit team has also interviewed with local FFB Suppliers and local communities and from the interviews, it can be concluded that there was no evidence of any land disputes between local communities and at Ribubonus CU.
	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	YES	Based on Social Impact Assessment (SIA) Report for Ribubonus CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Ribubonus and the audit team had confirmed that there were no land issues related to previous owners. The audit team has also interviewed with local FFB Suppliers and local communities and from the interviews, it can be concluded that there was no evidence of any land disputes between local communities and at Ribubonus CU.

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Clause	Indicators	Comply Yes/No	Findings
	<p>4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p>	<p>YES</p>	<p>Based on Social Impact Assessment (SIA) Report for Ribubonus CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Ribubonus and the audit team had confirmed that there were no land issues related to previous owners.</p>
	<p>4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p>	<p>YES</p>	<p>Based on Social Impact Assessment (SIA) Report for Ribubonus CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Ribubonus and the audit team had confirmed that there were no land issues related to previous owners.</p>
	<p>4.5.5 Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p>	<p>YES</p>	<p>Based on Social Impact Assessment (SIA) Report for Ribubonus CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Ribubonus and the audit team had confirmed that there were no land issues related to previous owners.</p>
	<p>4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the</p>	<p>YES</p>	<p>(Onsite) Based on Social Impact Assessment (SIA) Report for Ribubonus CU and land titles, there was no new plantings on local peoples' land. It has been verified that the land is legitimately owned by Ribubonus and the audit team had confirmed that there were no land issues related to previous owners.</p>

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Clause	Indicators	Comply Yes/No	Findings
	issuance of a new concession or land title to the operator.		
	4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	YES	There were no new lands acquired for plantation and mills after 15/11/2018. The current operation area including mill and estates as per stated in the land title. The requirement in this indicator does not apply to Ribubonus CU.
4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with thru a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	YES	It has been verified that the land is legitimately owned by Ribubonus CU. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	YES	In the event of a dispute, complainants and whistleblowers, the CU will manage it through the "Whistle Blowing Policy" and "Dispute and Grievances Procedure". The procedure starts with the receipt of complaint from any party, its investigation, proposed solutions and acceptance of the solutions or otherwise. If the proposed solution was rejected, the dispute will be brought for third party arbitration.
	4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.	YES	There were no scheme small holdings at Ribubonus CU. The Fresh Fruit Bunches are supplied from Ribubonus CU owned estates and Contracted FFB suppliers.
	4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	YES	There were no process and outcomes of any negotiated agreements, compensation and payments to any affected parties. The requirement in this indicator does not apply to Ribubonus CU

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Clause	Indicators	Comply Yes/No	Findings
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	YES	A procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Wilmar Sustainability Policy established by the Wilmar HQ. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures. However, the requirement in this indicator does not apply to Ribubonus CU at present.
	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	YES	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)”. However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers at mill and consulted estates. The requirement in this indicator does not apply to Ribubonus CU.
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	YES	It has been verified that the land is legitimately owned by Ribubonus CU. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. From the interviews, it can be concluded that there was no evidence of any land disputes between local communities and at Ribubonus CU. Communities that have lost access and rights to land for plantation expansion did not exist, hence, this Indicator is not applicable.
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.	4.8.1 Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	YES	It has been verified that the land is legitimately owned by Ribubonus CU. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. From the interviews, it can be concluded that there was no evidence of any land disputes between local communities and at Ribubonus CU.
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification	YES	It has been verified that the land is legitimately owned by Ribubonus CU. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. From the interviews, it can be concluded that there was no evidence of any land disputes between local communities and at Ribubonus CU.

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Clause	Indicators	Comply Yes/No	Findings
	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	It has been verified that the land is legitimately owned by Ribubonus CU. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Ribubonus CU since 1998. Hence, there is no land conflict anticipated and no need for acceptable conflict resolution processes.
	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	It has been verified that the land is legitimately owned by Ribubonus CU. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Ribubonus CU since 1998. Hence, there is no land conflict anticipated and no need for acceptable conflict resolution processes.

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 are being displayed at the notice board near the Ribubonus POM weighbridge.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	YES	Ribubonus POM is currently on Mass Balance as not all of its suppliers are RSPO certified. Ribubonus regularly explains the FFB pricing to the smallholders (FFB suppliers) during Stakeholder Meeting. The calculation of FFB pricing as in the SECOND SCHEDULE was also included as attachment to the FFB Supplier Agreements. Monthly FFB price is also presented in detail and displayed at the notice board near the Ribubonus POM weighbridge.

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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	At Ribubonus POM, fair FFB pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base.
	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	At Ribubonus CU, there are records kept of parties, including women and independent representative organisations assisting smallholders 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. The requirement of this Indicator is not applicable.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	YES	There is evidence that contracts entered into with FFB suppliers, CPO transporters and other Contractors are fair, legal and transparent. Among others, the contracts are dated, with clear provisions on contract duration, scope of services, payment of fee, obligation and undertaking of parties, provisions related to default and termination, rights and obligations upon termination, clause on dispute, etc. Annexes of the FFB supplier and transporter contracts specify method of FFB pricing calculation, schedule of transportation rates and transport rate adjustment mechanism, respectively. The rates are clearly stipulated as Appendix, and price adjustments when applicable due to diesel price fluctuations are stipulated, and payment term is within 30 days of date of invoice. Interviews with representatives of these sampled companies acknowledged fair pricing, treatment and transparency.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	YES	Interview with FFB suppliers/smallholders confirmed the agreed payments are made in a timely manner (not later than 30 days) and receipts 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 Ribubonus POM has been calibrated by yearly basis using accredited weighing company Metrology Corporation Malaysia Sdn Bhd in Nov 2021.
	5.1.8 The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of	YES	Ribubonus CU 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.

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Clause	Indicators	Comply Yes/No	Findings
	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, at Ribubonus CU, at the time of Audit, there were no Independent Smallholders with certification yet.
	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	A grievance mechanism which respects anonymity and protects complainants is in place at the Ribubonus CU as per Relevant policy titled "Whistleblowing Policy", " <i>No Deforestation, No Peat, No Exploitation Policy</i> " and Procedure namely "Dispute & Resolution Procedure", "Flowchart of Conflict Resolution". As at to date there is no complaint by stakeholders.
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	Ribubonus CU are interested to provide consultation to interested smallholders (irrespective of type and outside the supply base) including women or other partners to assess their needs for support to improve their livelihoods and their interest in RSPO certification. Wilmar Also has develop team lead by Mr Yeap Su Jeen under Sustainability Department Third Party Supplier and Smallholder Development regarding Support Smallholder Program. However, based on available record of meeting dated in Oct 2021 at the Ribubonus CU, no smallholders outside the supply base had shown interest to contact Ribubonus CU for consultation.
	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	Ribubonus CU has develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies it can be evidence through Ribubonus POM Program by given the Compost fertilizer to surrounding Smallholder from June 2020.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	YES	Ribubonus CU has provides support to smallholders to promote legality of FFB production, it can be evidence through the Stakeholder Meeting Dated 28/10/21.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	YES	There are no Scheme Smallholders in Ribubonus CU FFB supply base. The requirement of this Indicator is not applicable to Ribubonus CU.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	YES	There are support programmes for smallholders within the supply base. Ribubonus CU regularly reviews and publicly reports on the progress of its smallholder support programme.

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Principle 6: Respect workers' rights and conditions

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

Clause	Indicators	Comply Yes/No	Findings
6.1 Any form of discrimination is prohibited.	6.1.1 (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	YES	Ribubonus CU subscribes to Wilmar's Equal Opportunity Policy (dated Sept 2010 updated on Jan 2018). The policy was approved by Kuok Khoon Hong, Chairman and Chief Executive Officer, Wilmar International Limited. 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. In particular, 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	Based on documentation reviewed such as employment contracts and letters of offer, pay slips, allocation of housing at the linesite and audit interviews, there is no evidence that local and foreign workers, women and local communities have been discriminated against. Interviews conducted with workers (male, female, local and migrant) as well as local communities also confirmed that this is so. There is also no evidence of payment of recruitment fees by migrant workers.
	6.1.3 The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	YES	As confirmed by the worker during interview, there is no evidence that pregnancy testing was carried out in a discriminatory manner. Pregnancy test was done on her own free will. During interview it was confirmed that if they require contact with chemicals, they will allocate to other light works. There is no evidence that pregnancy tests are being conducted as a discriminatory measure. Pregnancy test is required to determine for Foreign Workers' Medical Examination (FOMEMA). Pregnancy test was done on her own free will.
	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	The gender committees throughout the Ribubonus CU are known as the Women and Children Committees. Membership comprises female employees and the employees' wives. Based on minute meeting sampled, 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, immunization and education, as well as women's reproductive rights. Meetings are held every 4 to 6 months.
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	YES	Ribubonus CU subscribes to Wilmar's Equal Opportunity Policy. The policy was approved by Kuok Khoon Hong, Chairman and Chief Executive Officer, Wilmar International Limited. 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

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Clause	Indicators	Comply Yes/No	Findings
			from unlawful and unethical discrimination. In particular, 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.
6.2 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).	6.1.6 There is evidence of equal pay for the same work scope.	YES	Ribubonus CU subscribes to Wilmar's Equal Opportunity Policy (dated Sept 2010 updated on Jan 2018). The policy statements emphasize on worker information, recruitment and selection, training, employee development, based on business needs, terms of service and records of service. It also 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. This policy is posted on notice boards in Bahasa Malaysia and English for the understanding of the public and workers.
	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	Pay and conditions are documented and made available during the surveillance audit. These are contained in the workers' payslips and employment contracts. Pay slips were sighted and are provided to workers on a monthly basis as confirmed during interview with management. Pay slips for Mill and Estate field workers show breakdown for all work done such as allowances received, deductions, no. of days worked and for the Mill, any overtime hours performed. It was also verified that workers are being paid in accordance with the requirements stipulated under the Minimum Wages (Amendment) Order 2020 (from January 2020 onwards) and the Sabah Labour Ordinance. Documentation of pay are available in the form of monthly pay slips, and conditions of pay are contained in employment contracts and letters of employment offer. Copies of these documents are provided to the workers. Briefing on relevant provisions on the Sabah Labor Ordinance on their rights under the employment contract such as public holidays, paid annual leave, paid maternity leave, final repatriation costs to be paid by employer, and termination of contract. There is evidence that workers observe regular working hours including overtime hours within the legal confines of the Sabah Labor Ordinance. This was verified from the mill/estate workers' employment contracts, punch cards, checkroll book and interviews with the workers themselves. They are also entitled to at least 30 minutes' rest after 5 hours of work.
	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	
	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	
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and	YES	Evidence is available that the Ribubonus CU provide adequate housing and facilities to its employees in accordance with the requirements of the Workers' Minimum Standard of Housing and Amenities Act 1990. Houses are provided rent free. Each house has

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Clause	Indicators	Comply Yes/No	Findings
	welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.		between 2 to 3 rooms and accommodate between 2 to 5 workers. Foreign workers are provided with accommodation as stated in their employment contracts. Local workers too are offered accommodation, but those who are within the local communities prefer to live outside the estate/mill premises. Among the available amenities include football fields, badminton/takraw/volleyball court, children's playground, places of worship, sundry shops and an activity hall.
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	All units have its own canteen and 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 its expiry period. Workers interviewed informed that they purchase items from these stores, but also since the estates and mill are easily accessible to the nearest town, they also go out to the towns. Workers could 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.	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. Ribubonus 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.
	6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	YES	All the estates and mill employ full-time employees. Foreign workers are full-time employees but have a contractual duration which is stipulated in their employment contracts which is 2 years for Indonesian. This contract duration can be mutually extended subject to the annual work permit from the Malaysian Immigration Department.
6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of	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 3xvi 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 representatives, who are freely elected, are	YES	The meeting was discussed on workers welfare, complaints and grievances, housing and annual activities. Based on interview with both Ribubonus POM and Ribubonus Estate employees, they was satisfy on the meeting needs.

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Clause	Indicators	Comply Yes/No	Findings
association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	documented in national languages (English and/or Bahasa Malaysia) and made available upon request.		
	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	The formation of labor committees was done without interfere of the management. The ballout process was nominated into four (4) categories i.e representative of local workers (male and female) and representative of foreign workers (male and female).
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	Ribubonus 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. Ribubonus CU also has an SOP entitled Preventing Child Labour and Remedial Action in Case of Child Labour. This SOP also details out the remediation action to be taken should a child is found working. This includes awareness trainings for all employees and contractors, schools should encourage and motivate children to attend school, parents to be advised and warned verbally on the spot not to allow children to assist them, and the child sent home or to an appropriate child care facility.
	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 Ribubonus CU. Evidence is available that minimum age requirements are met. Documented age screening procedure is available from copies of passport and Malaysian NRIC, and copies of Indonesian workers' identity card known as KTP.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	YES	Based on documents sighted, interviews and observations, there was no evidence that the Estates and the Mill employ anyone below the age of 18 years. This was verified by examining the master lists of each operating unit where details of the workers' particulars and dates of birth are available. Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed.
	6.4.4 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,	YES	Communication demonstrated as per stakeholder interview and records of stakeholder meeting sighted. Latest external stakeholder meeting conducted at Ribubonus CU involved relevant stakeholders such as government authorities, school's representatives, contractors, internal workers and etc. were briefed on all the RSPO principles and criteria.

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Clause	Indicators	Comply Yes/No	Findings
	smallholders, FFB suppliers and communities where workers live.		
6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.	6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	YES	The CU had established policy on sexual harassment. A Policy on Sexual Harassment, Violence and Abuse, Reproductive Rights Policy was verified and is used as guide actions on the sexual harassment cases in the estates/mill. The policy was communicated to all levels of workforce by displaying it at the notice board
	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	The CU has established policy on reproductive rights which given their employee i) to decide freely and responsibly of their planning to have children, and ii) to make decisions concerning reproduction freed of discrimination, coercion and violence.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	YES	Assessment of new mothers had been conducted in July 2021. It has been conducted through "Borang Penilaian Keperluan Ibu-Ibu Yang Bekerja". The assessment includes on the activities, risk, individual who exposed to the risk, control measures, person responsible and action taken.
	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 estate and mill have developed a grievance mechanism, which respects anonymity and protects complainants is established under: <ul style="list-style-type: none"> • Safe and Standard Operating Procedure for Sexual Harassment. • Stakeholder Consultation Procedure – Group Level & Estate/Mill Level. • Grievance Procedure (Internal & External). • Request for Information Procedure. • Procedure Whistleblower. All the mechanism is implemented and communicated via Morning Muster, JCC Meeting and Gender Committee.
6.6 No forms of forced or trafficked labour are used.	6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited: <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign 	YES	All workers in the Ribubonus CU have entered into employment voluntarily, it was verified during the interview with local and Indonesian workers. The workers had been informed that they will work in Oil Palm Sector before applying this job. Migrant workers are given the option of either keeping their own passport or keeping the passports in the office safe box. The mill and estate have given back passport to migrant workers as verified during interviewed with the workers. However, the migrant workers request the office to keep their passport due to safety reason without any force from the CU management as verified through 'Borang Penyimpanan dan Peminjaman Passport', and 'Rekod Simpanan & Pengambilan Passport'. Foreign workers also are freely to take back their passport after filling these forms. All the passport is stored in the safe locker in manager office 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 understand their contract which is if they want to resign, prior to 8 weeks of notice, they

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Clause	Indicators	Comply Yes/No	Findings
	<ul style="list-style-type: none"> • Penalty to the workers for termination of employment • Debt bondage • Withholding of wages 		will not 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	<p>There is a special labour policy and procedures established known as "Recruitment of Workers". This document spells out the recruitment process from:</p> <ol style="list-style-type: none"> a. Manpower planning – applying for quota, appointment of recruitment agent, sourcing of workers, workers interviews, satisfaction of employability criteria, shortlisting. b. Recruitment process – registration onto the approved Employee Master list and uploaded onto the SAP system. c. Orientation – briefing on language, safety procedures, labour laws, culture practices, surrounding community, housing, medical, amenities, issuance of PPE. d. Commencement of work – no discrimination, no contract substitution practices, post-arrival orientation programme and provision of decent living conditions. <p>Based on documentation review, there is evidence that the above SOP is being implemented within the Ribubonus CU.</p>
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	<p>Estate / Mill Managers were appointed as responsible person(s) for safety and health issues and also chairman for OSH Committee. The Manager subsequently assigned duties of ESH coordinator to the Assistants or healthcare assistant for the down line implementation of ESH practices in the estate and mill. All identified Executives were officially given a letter for such an appointment. Records of regular meetings between the responsible person and workers to discuss about health and safety had been verified to the satisfactory maintained. OSH Committee meetings confirmed that among the agenda discussed, included the following:</p> <ul style="list-style-type: none"> ▪ Passing of previous minutes and arising matters. ▪ Accident report (Monthly Data of Mill/Estate Safety Performance) ▪ Workplace inspection ▪ Safety report and programme ▪ COVID 19 issues
	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	NO	Emergency Response Plan (ERP) was established since 2007. During site inspection at estate and mill, it was sighted Emergency Response Plan was available at Boiler Station, Sterilizer Station, Chemical Store, Workshop, Lubricant Store etc. During interviews with workers it was noted that all workers understand regarding ERP. First aid training was conducted annually at Ribubonus, was sighted and reviewed. Master list of first aid box of all estate and mill which is available at the office was checked and verified. Observed that, first aid box is well provided for all the field mandores whose involved in harvesting, manuring and spraying works. The content of first box which is held by harvesting, manuring and spraying mandore was verified. The stock of first aid box is regularly check

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Clause	Indicators	Comply Yes/No	Findings
	<p>both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>		<p>and refill when necessary by estate Hospital Assistant. Accident statistics were being maintained in a satisfactory manner and periodically reviewed. Accident/injury record were recorded using Lost Time Accident (LTA) metrics. Quarterly review on accident cases had been carried out during quarterly OSH committee meeting.</p> <p>The Ribubonus CU located with separated in between by the main tributary of Labuk and transportation cross via Ferry Landing Point (Time 6.00am to 6.00pm). However, accident and emergency procedures were not in place and monitored. <i>Therefore, Minor NCR DA 02 2021 was issued.</i></p>
	<p>6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>YES</p>	<p>All staff and workers such as the storekeepers, harvesters and sprayers/manurers were continuously trained in safe working practices including SSOP for PPE related to their job function. Appropriate PPE were given to workers based on HIRARC and SSOP recommendations suitable for the job position or hazardous operation undertaken. Records of PPE issued and acknowledgement of receipt are maintained individually for all category of workers at mill and estates. Sighted common PPE issued included face masks respirators, goggles, safety shoes, harvesting shoes, rubber boots, nitrile/cotton gloves, apron and hard hat. In addition to basic PPE, special PPE are also provided for workers assigned to dangerous operation such as work at height and in confined space. All workers were provided with appropriate PPE where the cost are bared by the management. Interviews conducted during the site visit at the Mill and Estate showed understanding and approval from the workers that the management bares the cost of all PPEs and the workers are entitled to valid PPE, the importance of using required PPE at all times during work and proper storage and disposal methods of PPE.</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>Medical care and accident insurance is provided to all employees, both Local and Foreign workers under Employees' Social Security Act 1969 (Act 4).</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 Ribubonus CU has maintained and updated the LTA Summary by monthly basis. For accidents records, Ribubonus CU managed to submit the JKKP 8 form to DOSH within Jan, the next year.</p>

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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	Ribubonus Estate continued to implement IPM Plan as per Wilmar International Limited Agricultural Manual and Standard Operating Procedure for Oil Palm 2011 (Addendum 01/06/2016) under Chapter 6 – Upkeep and Maintenance of Oil Palm and Chapter 8 – Plant Protection, Pest and Disease Management. In order to minimize the use of pesticides, 5 methods i.e. monitoring / pest population, cultural control, biological control, physical / mechanical control and pesticides usage were implemented. The estate continues to implement cultural / biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estate include monitoring of pest numbers and the use of triggers for initiation of control measures. Although there have been no outbreaks of leaf eating pests, beneficial plants are being established along main roads and block boundaries to attract natural predators. The estate has established IPM program. The plan was reviewed on annually basis. The IPM consist of Planting Beneficial Plant, Rat Baiting Applications, and Ganoderma census. There is no barn owl nest in the plantation.
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	YES	Species referenced in the Global Invasive Species Database and CABI.org are not used in the estate.
	7.1.3 There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	YES	Wilmar Internal Limited had a policy of no open burning. As advocated, the estate practised Zero burning thus no use of fire for pest control. No replanting operation during the audit process.
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.	YES	Ribubonus CU continued to use agrochemicals based on the Wilmar International Limited Agriculture Manual & Standard Operating Procedure for Oil Palm 3/2011 for various fields operations. 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.
	7.2.2 (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	YES	The estate 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.

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Clause	Indicators	Comply Yes/No	Findings
	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 estate continues to implement cultural / biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estate include monitoring of pest numbers and the use of triggers for initiation of control measures. Although there have been no outbreaks of leaf eating pests, beneficial plants are being established along main roads and block boundaries to attract natural predators. The estate has established IPM program. The plan was reviewed on annually basis. The IPM consist of Planting Beneficial Plant, Rat damage census, and Ganoderma census.
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	YES	There was no evidence of any prophylactic use of pesticides in Oil Palm planted area. Ribubonus Estate 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	Based on chemical register, chemical bin cards, chemical stock purchase, it was noted that Ribubonus Estate had not use chemicals categorized as World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions. Except for Amine and Cypermethin which were Class II chemicals, all others were of Class III & IV. Paraquat has not be used since 2008 and was replaced by a systemic herbicide and glufosinate ammonium. Ribubonus Estate had maintained chemical registers for chemicals used and were updated in January 2021. The Chemical Registers had listed all Chemicals, Diesel, Petrol, Lubricants and Fertilisers.
	7.2.5a Judgment of the threat and verify why this is a major threat.	YES	
	7.2.5b Why there is no other alternative which can be used.	YES	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	YES	
	7.2.5d What is the process to limit the negative impacts of the application.	YES	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	YES	
	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	YES	The estate and mill have the SSOP for use of PPE during working. All workers involved in pesticide application were provided with appropriate PPE and replaced when damaged. PPE issue and replacements records were verified by the auditors. Observed during site visit, the PPE provided to the operators such as google, face respirator, nitrile hand glove, rubber boot and apron. Additionally, the operators have been given training regarding the usage safety and health issue and proper way for chemical application by the plantation

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Clause	Indicators	Comply Yes/No	Findings
	properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.		executives, manager, and asst. manager and chemical supplier with knowledge on chemical handling and applications.
	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 estate 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. A proper premixing area with eye wash facilities and bathing area is available near to the chemical stores. The wastewater from the washing of empty chemical containers and PPE, and chemical mixing was pumped to a storage tank for reuse in chemical mixing.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	Empty pesticide containers was punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. Inventory and consignment documents verified for confirmation of proper management and disposal. It was found that scheduled waste generated at the mill and estate stored more than 180 days due to COVID 19 MCO Restriction.
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	YES	Aerial spraying was not practiced in the estate and there was no evidence to show that any had been carried out.
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	YES	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or	YES	Ribubonus CU continued to comply with procedures where no work with pesticides was given to persons under the age of 18, pregnant or breast-feeding women. List workers

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Clause	Indicators	Comply Yes/No	Findings
	breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.		involved with pesticides were maintained by the estate and mill. Identification of pregnancy was done at the estate's clinics during the monthly medical check-up and interview with female workers. Pregnancy test was conducted on doubtful cases.
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	YES	Ribubonus CU, sighted Waste and Pollution – Identification, Prevention, Mitigation and Improvement Plan that applicable for all estates. The estates have identified and documented type of waste that generated from its operation in a Waste Management Plan 2020. The waste management plan has also identified source of pollution, possible waste/pollution, effected environment, prevention, mitigation and enhancement. Other sources of pollutions are also listed in the Waste Management Plan such as workshop, line-site, office, store, canteen, replanting area and etc. Sources of pollution and waste have been adequately identified by all estates. Generally, the wastes identified were of general, recyclable and scheduled wastes. It had listed the waste product, sources of pollution, mitigation measures, target, and person responsible. Among the wastes that were identified include domestic wastes from household, scrap iron, empty chemical containers and scheduled wastes.
	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. Scheduled wastes identified included hydraulic oil (SW305), spent lubricant oil (SW306), used chemical containers/drums (SW409), used filter (SW410), laboratory (SW430), used batteries (SW102), and clinical wastes (SW 404).
	7.3.3 The unit of certification does not use open fire for waste disposal.	YES	During site visit at Ribubonus CU, there was no evidence of open fire has been used for waste disposal. All domestic wastes (household and food waste only) have been disposed via landfill.
7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level that ensures optimal and sustained yield.	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	YES	Ribubonus Estate continued to practice the maintenance of long-term soil fertility by annual application of fertilizer based on foliar sampling and soil analysis, biomass retention (pruned fronds left to decompose in the fields), EFB application and solid POME application in some fields. Fertiliser application, which was of paramount importance for maintenance of soil fertility, was carried based on the recommendation made by the EMU recommendations made by Head of R&D Department. Annual fertiliser recommendations were made based on annual foliar sampling and soil sampling. Some of the main fertiliser recommend for 2021 were GML, NK2, BRP, Duo8 and NK2.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	YES	Ribubonus Estate continued to practice the maintenance of long-term soil fertility by annual application of fertilizer based on foliar sampling and soil analysis, biomass retention (pruned fronds left to decompose in the fields), EFB application and solid POME application in some fields. Fertiliser application, which was of paramount importance for maintenance of soil fertility, was carried based on the recommendation made by the EMU

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Clause	Indicators	Comply Yes/No	Findings
			recommendations made by Head of R&D Department. Annual fertiliser recommendations were made based on annual foliar sampling and soil sampling. Some of the main fertiliser recommend for 2021 were GML, NK2, BRP, Duo8 and NK2.
	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	Ribubonus Estate continued to have a nutrient recycling strategy in place. a) Palm fronds were stacked in the fields to decompose and by EFB and decanter cake application.. b) Records of application and maps were reviewed by the audit team.
	7.4.4 Records of fertiliser inputs are maintained.	YES	Fertiliser application, which was of paramount importance for maintenance of soil fertility, was carried based on the recommendation made by the EMU recommendations made by Head of R&D Department. Annual fertiliser recommendations were made based on annual foliar sampling and soil sampling. Some of the main fertiliser recommend for 2021 were GML, NK2, BRP, Duo8 and NK2.
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	Based on the soils maps, there were no fragile/marginal soils in the estate visited. The soil maps came with description of the soil's characteristics such as texture, depth, drainage, parent material and key aspect for management. The soil series were classified as follows: <ul style="list-style-type: none"> ▪ Baiyo ▪ Binuang ▪ Katai ▪ Nobusu ▪ Organic Clay ▪ Orgainc Clay Muck ▪ Paliu ▪ Pinianakan ▪ Tanjong Lipat
	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	No replanting of any individual, contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Ribubonus Estate was observed during the audit. The estate continued to have in place management strategy for plantings on slopes between 12 and 25 degrees. The procedure on land clearing and preparation for undulating to steep land had been covered in Chapter 3 of the Wilmar International Limited, Agriculture Manual and Standard Operating Procedure 2011. It was observed that in estate the hilly areas had been terraced. Slopes especially along some roadside had well established <i>Mucuna bracteata</i> .
	7.5.3 There is no new planting of oil palm on steep terrain.	YES	Auditors have verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all three estates. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at Ribubonus CU.

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Clause	Indicators	Comply Yes/No	Findings
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	(Onsite) As per Ribubonus Estate, to demonstrate the long-term suitability of land for palm oil cultivation have conducted soil surveys identifying marginal and fragile soils, and terrain surveys including steep terrain, as mentioned under indicator 7.5.1 soil maps by Param Agricultural Soil Surveys (M) Sdn Bhd on January/February 1991 with revised and updated in June 2019 and slope classification maps dated were made available.
	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	YES	Extensive planting on marginal and fragile soils, was avoided by the estate. There were no fragile/marginal soils in Ribubonus CU.
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	YES	Auditors have verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all three estates. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at Ribubonus CU.
7.7 No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	YES	Auditors have verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all three estates. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at Ribubonus CU.
	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).	YES	Areas of peat within the managed areas were inventoried, documented and reported to RSPO Secretariat. Evidence was sighted that the Report along with maps, etc was sent to RSPO Secretariat by the Senior Manager Sustainability on 05/11/2019 with 1.21 ha peat area and 1.09 ha plating in peat. However, based on Soil Survey Report from Param Agricultural Soil Surveys (M) Sdn Bhd on January/February 1991 with revised and updated in June 2019 indicated that, there is no peat soil available at Ribubonus Estate. The peat inventoried was updated to RSPO Secretariat via email dated 12/11/2021.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	YES	This is not applicable as there is no peat soil in the Ribubonus Estate as supported by the soil maps and Soil Survey Report from Param Agricultural Soil Surveys (M) Sdn Bhd on January/February 1991 with revised and updated in June 2019.
	7.7.4 (C) A documented water and ground cover management programme is in place.	YES	This is not applicable as there is no peat soil in the Ribubonus Estate as supported by the soil maps and Soil Survey Report from Param Agricultural Soil Surveys (M) Sdn Bhd on January/February 1991 with revised and updated in June 2019.
	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The	YES	This is not applicable as there is no peat soil in the Ribubonus Estate as supported by the soil maps and Soil Survey Report from Param Agricultural Soil Surveys (M) Sdn Bhd on January/February 1991 with revised and updated in June 2019.

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Clause	Indicators	Comply Yes/No	Findings
	<p>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. 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>	YES	<p>This is not applicable as there is no peat soil in the Ribubonus Estate as supported by the soil maps and Soil Survey Report from Param Agricultural Soil Surveys (M) Sdn Bhd on January/February 1991 with revised and updated in June 2019.</p>
	<p>7.7.7 (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.</p>	YES	<p>This is not applicable as there is no peat soil in the Ribubonus Estate as supported by the soil maps and Soil Survey Report from Param Agricultural Soil Surveys (M) Sdn Bhd on January/February 1991 with revised and updated in June 2019.</p>
<p>7.8 Practices maintain the quality and availability of surface and</p>	<p>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:</p>	YES	<p>Ribubonus Estate and Ribubonus POM had in place a water management plan last reviewed dated May 2021 to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. Attention was given to water quality, quantity, and consumption usages. For Ribubonus Estate and Ribubonus POM the water management was reviewed by the by Eco-Management Unit (EMU). Water supply for the estate and POM comes mainly from</p>

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Clause	Indicators	Comply Yes/No	Findings
groundwater.			Sungai Labuk. River water quality (upstream and downstream) is tested every monthly to ensure the water supply is in usable condition. Water pumped from the river is treated in WTP by various chemicals i.e. Geschem P61S(PAC), Soda Ash, Cestfloc 1881, and Cestchem 6210. Ribubonus CU also maintained monitoring records of water usage which recorded every day and summarized 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	Supplies are made to all housing areas and office complexes in the respective estates as the sources are from the internal water pond and catchment. For Estate, 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) for Ribubonus Estate. The ECR was conducted by appointed 3 rd party. The ECR assessment was carried one every 4 months. For POM, 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.
	7.8.1b 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 4 months (In Compliance with WHO) 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, including maintaining and restoring appropriate riparian and other buffer zones	NO	Water courses and wetlands was not protected, including maintaining and restoring appropriate riparian and other buffer zones was not in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017). During site inspections at: 1) Ribubonus POM Worker Quarters No Unit D4, sighted chemical spraying activities was carried out at the monsoon drains and the compound. 2) Ribubonus Estate, Block 74, sighted chemical spraying activities was carried out close to the water's edge near the riparian reserved. 3) Ribubonus Estate, Block 25, sighted EFB was dumped close to the water's edge Main Drain and the EFB was leached to the watercourse. <i>As a result, Major DA 03 2021 was raised.</i>
	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 2021/2022 and letter from Department of Environmental Sighted License. A Methane Capture Plant (Biogas Lagoon) and Effluent Treatment Plant (ETP) are available at Ribubonus POM to treat the POME. Effluent treatment process flow sighted in the Lay Out Effluent Pond. Stated in the process flow is the maximum mill capacity per hour is 30mt ffb/hr. According to DOE's license, the disposal method of the final discharge is through land irrigation. The Biogas and ETP was regularly

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Clause	Indicators	Comply Yes/No	Findings																										
			maintained by desludging of the ponds to ensure its efficiency.																										
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	Process water is obtained from water catchment near to the mill. The water usage per tonne of fresh fruit bunches (FFB) continued to be monitored on monthly basis.																										
7.9 Efficiency of fossil fuel use and the use of renewable energy is optimised.	7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented.	YES	<p>The plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented. Record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. Among the plan for improving fossil fuel are:</p> <ul style="list-style-type: none"> ▪ Closely monitored operation of tractors ▪ Minimise the electricity usage at workers housing ▪ Replace light bulb with energy saving bulb ▪ To switch off and unplug all the electrical equipment after used ▪ Minimise the lubricant oil usage through using small tractor for FFB evacuation 																										
7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.	7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.	YES	<p>The report sends via email to RSPO on 15/11/2021 through the Palm GHG calculator and publicly reported.</p> <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Description</th> <th>tCO₂e/tProduct</th> </tr> </thead> <tbody> <tr> <td>Year</td> <td>FY 2020</td> </tr> <tr> <td>CPO</td> <td>0.85</td> </tr> <tr> <td>PK</td> <td>0.85</td> </tr> </tbody> </table> <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Production</th> <th>t/yr</th> </tr> </thead> <tbody> <tr> <td>Year</td> <td>FY 2020</td> </tr> <tr> <td>FFB Processed</td> <td>208,472.17</td> </tr> <tr> <td>CPO Processed</td> <td>44,968.348</td> </tr> </tbody> </table> <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Land Use</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>Year</td> <td>FY 2020</td> </tr> <tr> <td>OP Planted Area</td> <td>12736.23</td> </tr> <tr> <td>OP Planted on Peat</td> <td>10.34</td> </tr> <tr> <td>Conservation (forested)</td> <td>4033.21</td> </tr> </tbody> </table>	Description	tCO ₂ e/tProduct	Year	FY 2020	CPO	0.85	PK	0.85	Production	t/yr	Year	FY 2020	FFB Processed	208,472.17	CPO Processed	44,968.348	Land Use	Ha	Year	FY 2020	OP Planted Area	12736.23	OP Planted on Peat	10.34	Conservation (forested)	4033.21
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Clause	Indicators	Comply Yes/No	Findings			
			Conservation (non-forested)		328.02	
			Milling extraction rate:			
			Year	FY 2020		
			OER	21.57		
			KER	4.19		
			Mill Emission			
			Emission source	tCO2e	tCO2e/tFFB	
			FY 2020			
			POME	7763.61	0.04	
			Fuel consumption	370.03	0.00	
			Grid electricity utilisation	0.00	0.00	
			Credits			
			Export of excess electricity to housing & grid	-427.66	0.00	
			Sale of PKS	-10673.83	-0.05	
			Sale of EFB	0.00	0.00	
			Total	-2967.85	-0.01	
			Plantation / field emission			
			Own			
			Emission sources	tCO2e	tCO2e/ha	tCO2e/FFB
			Land Conversion	67355.59	9.85	1.09
			CO2 Emissions from Fertiliser	5778.58	0.85	0.09
			N2O Emissions from Peat	77.18	0.01	0.00
			N2O Emissions from Fertiliser	3742.10	0.55	0.06
			Fuel Consumption	1330.55	0.19	0.02
			Peat Oxidation	7423.22	1.09	0.12
			Sinks			
			Crop Sequestration	-63844.16	-9.34	-1.03
			Conservation Sequestration	0.00	0.00	0.00
			Total	21863.06	3.20	0.35

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Clause	Indicators	Comply Yes/No	Findings										
			<p>Palm Oil Mill Effluent (POME) Treatment</p> <table border="1"> <tr> <td>Diverted to compost</td> <td>0%</td> </tr> <tr> <td>Diverted to anaerobic digestion</td> <td>100%</td> </tr> </table> <p>Diverted to Anaerobic Digestion</p> <table border="1"> <tr> <td>Diverted to anaerobic pond</td> <td>20%</td> </tr> <tr> <td>Diverted to methane capture (flaring)</td> <td>42%</td> </tr> <tr> <td>Diverted to methane capture (electricity generation)</td> <td>38%</td> </tr> </table>	Diverted to compost	0%	Diverted to anaerobic digestion	100%	Diverted to anaerobic pond	20%	Diverted to methane capture (flaring)	42%	Diverted to methane capture (electricity generation)	38%
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	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).	YES	Auditor has verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to the sampled estates areas. Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at Ribubonus CU. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.										
	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	YES	The Environmental Impact and Aspect Assessment and Pollution Prevention Plan was used to identify the GHG emissions. Some of the Greenhouse Gas emissions are through Land Conversation, Crop Sequestration, Fertiliser, N ₂ O from fertiliser, Fuel Consumption, Peat Oxidation. Plans to reduce or minimise them are in place. Ribubonus CU also plan to reduce GHG by construct Biogas plant to capture Methane gas generated from the Effluent Treatment Plant to generate biogas engine to produce electricity for mill and domestic use.										
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. Ribubonus Estate had complied to the policy. There was no evidence to show that fire had been used for preparing land for replanting. Ribubonus Estate has not commenced replanting, scheduled in 2022.										
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	Ribubonus CU had established fire prevention and control measures for the areas under direct management estate and POM. In the mill their water hydrant and valid fire extinguishers at the various operating stations. Ribubonus Estate had valid fire extinguishers at the office, employee quarters, chemical & fertiliser stores, diesel skid tank.										
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	YES	The CU had not practiced any open burning and there was no evidence to show that fire had been used for preparing land for replanting activity. The CU also engaged with adjacent to stakeholder on fire prevention and control measures by inviting them to join training.										

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Clause	Indicators	Comply Yes/No	Findings
<p>7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>	<p>7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p>	<p>YES</p>	<p>Auditors has verified through checking through www.globalforestwatch.com, Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Ribubonus CU since Nov 2005.</p>
	<p>7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:</p>	<p>YES</p>	<p>The HCVF assessment of the estate was completed in February 2009. In addition to the report 'HCVF Scoping Assessment of Ribubonus Estate of PPB Oil Palms Berhad' an additional HCV Report was prepared in May 2017. The assessor had identified conservation area which were steep area also known as Bukit Beruang, Bukit Kucing and Bukit Rotan including riparian buffer for Sg. Labuk as HCV 4. Only HCV 4 area was identified and the total area for HCV at Ribubonus CU is 258.42 ha.</p>
	<p>7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p>	<p>YES</p>	
	<p>7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p>	<p>YES</p>	
	<p>7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>	<p>YES</p>	<p>Ribubonus Estate has established an action plan for HCV area titled 'HCV Monitoring and Action Plan FY2020 - 2024'. The plan was reviewed on 25 February 2020. Among the activities conducted were (i) HCV monitoring, (ii) awareness training to workers, (iii) to do sivilculture by removing vine and wild bamboo using Forest Department contractor on June 2018 and continuing until 2024 and also (iv) rehabilitation for riparian areas in Ribubonus Estate in December 2020-2024. The Government Agencies, NGO's, Surrounding Stakeholder affected to share the idea regarding the Ribubonus HCV Plan, and sighted the result of this communication has been updated to their Plan.</p>

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Clause	Indicators	Comply Yes/No	Findings
	7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	YES	There were no local communities living nearby with Ribubonus CU only surrounding with Small grower and Plantation Estate such as Bentara Hijau, Alexsius Sergius, Twin Acres, Darul Harapan and Smallholders from Kg. Wonod. So, this indicator was not applicable with this CU.
	7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	YES	<p>The HCVF assessment of the estate was completed in February 2009. In addition to the report 'HCVF Scoping Assessment of Ribubonus Estate of PPB Oil Palms Berhad' an additional HCV Report was prepared in May 2017. The assessor had identified conservation area which were steep area also known as Bukit Beruang, Bukit Kucing and Bukit Rotan including riparian buffer for Sg. Labuk as HCV 4. Only HCV 4 area was identified and the total area for HCV at Ribubonus CU is 258.42 ha.</p> <p>Based on the Wildlife Survey Report dated June 2016 from HUTAN, there were numbers of RTE species found in the Ribubonus Estate. Among the RTE species identified were Crescent serpent eagle, Rhinoceros hornbill and Hill myna. These species were also classified as Class 2: Protected Species under Sabah Wildlife Conservation Enactment 1997. The estate has continued to implement action plan listed in the Wildlife Survey Report. A programme to regularly educate the workforce about the status of RTE species is in place Sighted latest training for HCV conducted for workers and contract workers.</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.	YES	Ribubonus CU continues to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that signage to prohibit hunting, fishing and pesticide spraying not allowed within buffer area at the HCV Area. It was noted that AP has been monitoring surrounding the estate to control everything including any illegal activities. The monitoring activities was recorded in the Conservation Monitoring Form January - December 2021. The monitoring activities was recorded in the Book Rekod Rondaan HCV.
	7.12.8 (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.	YES	Auditors has verified through checking through www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Ribubonus CU since Nov 2005. Remediation and Compensation Procedure (RaCP) did not apply.

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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	<p>Details are available as per the following attachments relating to Time Bound Plan of Wilmar International Plantation as at June 2021.</p> <p>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</p>
	(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	<p>Details of the Time Bound Plan described as per attachment 6 updated as at June 2021.</p> <p>Malaysia</p> <ul style="list-style-type: none"> • Suburmas POM- was added into Wilmar Membership in 2018, 3 years till certification deadline (2021); but postponed till 2023 due to Covid-19 which impeded movement of assessor for SIA, HCV/ HCS assessments • Laba Utama (division of Jebawang Estate)- was Acquired in 2019, 3 years till certification deadline (2022); but postponed till 2023 due to Covid-19 which impeded movement of assessor for SIA, HCV/ HCS assessments <p>Indonesia</p> <ul style="list-style-type: none"> • Buluh Cawang Plantation – HGU is in process – target to certified 2023 • Saranan Titian Permata 1,2,3 - Was certified till Nov 2017; certification to renew after HGU process. New mill constructed in 2017; initial certification to proceed after HGU process • KUDMakmur sejahtera, Srimaram Estate, KUD Buah Jubata, Agronusa Invenstama 2 (Landak), Pratama Procentindo & Agro Palindo Sakti, Putra Indotropical, Daya Landak Plantation - Land title issue – target to certified once land title success (2023) • PT Murini Sam Sam, PT Musi Banyuasin Indah Mill -Final Audit, HGU issue • PT Sinarsiak Dianpermai Mill - Pre assessment audit, HGU issue • Agrindo Indah Persada 2 Mill - HGU issue <p>Ghana</p> <ul style="list-style-type: none"> • Treboum Smallholders- to certified on 2022 NPP passon 2019 • Biase Plantation Limited - to be certified on 2022 (mill construction

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				<p>completed) - delay from 2021 due to Covid-19</p> <ul style="list-style-type: none"> • Eyop Industries- target to certified 2025 to be certified (mill construction yet to start), pending clarification for NPP assessment • To be certified (NPP not started), Pending clearance from government for NPP assessment
	(c)	<p>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);</p>	YES	<p>Details of the Time Bound Plan described as per attachment 6 updated as at June 2021</p>
	(d)	<p>Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised.</p>	YES	<p>Details of the Time Bound Plan described as per attachment 6 updated as at June 2021</p>
5.5.3 Requirements for uncertified management units:	(a)	<p>No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. Any new plantings since 1st 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>	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 been carried out for clause 5.5.3 (e)-(h) of certification system for units such as: Evidences & document reference such as HCV report results, land title, Racp status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc were concluded adequate in the report for all uncertified management units.</p>
	(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&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8;</p>	YES	<p>After the review of the document provided, it has been verified that the land titles were previously owned by Sabah Government. d) The land has been sold to Ribubonus Sdn Bhd on 22/6/98. The Land title also specified that the purpose of the planting is for oil palm cultivation for economic value. e) It can be confirmed that Ribubonus Sdn Bhd maintained and</p>

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			<p>complied with the terms of the land title.</p> <p>f) The land title for Ribubonus is country lease. The following land titles were available at the Mill and estate office;</p> <ul style="list-style-type: none"> ❖ The document CL085330089, granted the 3,262 Ha land to Ribubonus Sdn. Bhd. with 99 years lease (i.e. from 1st January 1998 to 31st December 2096) from the Sabah State Government and the condition of the lease is for 'Agriculture Purpose'. A certificate for land development (Sijil Pembangunan Tanah) dated 1 February 2007 was also reviewed. <p>Interview has been conducted with Head of Kg. Baba, Kg Gambaron, Kg. Gading and Kg. Ansuan. As a result, there was no land dispute. Ribubonus Estate continued to be the legal owner and have relevant proof of ownership of the land and no land conflicts issue at all.</p>
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2;	<p>YES</p> <p>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.</p>
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	<p>YES</p> <p>Wilmar International Limited (WIL) complied to all the related legal requirement. Evidences & document reference such as HCV report results, land title, Racp status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc. were concluded adequate in the report for all uncertified management units.</p>
	(e)	<p>The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 5.5.3 (a) – (d) above by the audit team based on self-declarations only by the company,</p> <p>with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:</p>	<p>YES</p> <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 (e)-(g) of certification system for units of the following i.e.</p> <ul style="list-style-type: none"> a) Indonesia Units b) Africa Units c) Malaysia Units

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	<ul style="list-style-type: none"> A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement; 	YES	<p>Evidences & document reference such as HCV report results, land title, Racp status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc. were concluded adequate in the report for all uncertified management units.</p> <p><i>As a result, previous Major NCR RAR 01 2019 was acceptable to closed.</i></p>
	<ul style="list-style-type: none"> Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. 	YES	
	<ul style="list-style-type: none"> Desktop study e.g. web check on relevant complaints 	YES	
	<ul style="list-style-type: none"> If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements. 	YES	
	<p>(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.</p>	YES	
	<p>(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.</p>	YES	

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<p>5.6.6</p> <p>The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p> <p>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>No additional indicators</p>	<p>YES</p>	<p>After the review of the document provided, it has been verified that the land titles were previously owned by Sabah Government.</p> <ul style="list-style-type: none"> a) The land has been sold to Ribubonus Sdn Bhd on 22/6/98. The Land title also specified that the purpose of the planting is for oil palm cultivation for economic value. b) It can be confirmed that Ribubonus Sdn Bhd maintained and complied with the terms of the land title. c) The land title for Ribubonus is country lease. The following land titles were available at the Mill and estate office; <p>The document CL085330089, granted the 3,262 Ha land to Ribubonus Sdn. Bhd. with 99 years lease (i.e. from 1st January 1998 to 31st December 2096) from the Sabah State Government and the condition of the lease is for 'Agriculture Purpose'. A certificate for land development (Sijil Pembangunan Tanah) dated 1 February 2007 was also reviewed.</p> <p>The audit team has also interviewed with local FFB Suppliers and local communities and it can be concluded that there was no evidence of any land disputes between local communities and at Ribubonus CU. The CU continued to be the legal owner and have relevant proof of ownership of the land and no land conflicts issue at all.</p>
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Attachment 4

DETAILS OF NON-CONFORMITIES AND CORRECTIVE ACTIONS TAKEN

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Root Cause & Corrective Action Taken by the CU	Verification Statement by Auditors
3.1.3 DA 01 2021	Minor	<p>Finding: The unit of certification holds management reviews, however, several scale and nature of the activities yet to be undertaken.</p> <p>Objective evidence: RSPO Internal Audit at Ribubonus CU was conducted on 20/10/2021 at POM and 18/10/2021 at Estate via Onsite Audit and conformance report was made available to the management for their review.</p> <p>The management review meeting for Ribubonus CU which were held on 29/10/2021 at POM and 28/10/2021 attended by estate/mill managers and his teams. It was chaired by Estate/Mill managers. The management review was discussed mainly for results of internal audits only. However, several scale and nature of the activities undertaken yet to be discussed:</p> <ol style="list-style-type: none"> 1. Customer (internal/external) feedback 2. Process performance and product conformity 3. Status of preventive and corrective actions 4. Follow-up actions from management reviews 5. Changes that could affect the management system 6. Recommendations for improvement <p>Furthermore, based on Internal Audit Procedure #PPB/PRO 12/(03)/0212, under point 6.2.3. Audit Notes and Audit Report was not made available for Ribubonus CU during the external audit process</p>	<p>Root cause: Management reviews done by estate and POM concentrated on the results of internal audit conducted by Sustainability Dept as per the current Internal Audit Procedure.</p> <p>Corrective Action: The Internal Audit Procedure will be revised to include the scale and nature of activities as mentioned/listed down. Future internal audits will follow the revised Internal Audit procedure. Expected date of completion @ 15 March 2022.</p>	<p>Corrective action plan is accepted and the effectiveness will be verified during next audit.</p> <p>Status: Open.</p>
3.3.1 MAR 01 2021	Major	<p>Finding: Standard Operating Procedures (SOP) for certain operations was not in place</p> <p>Objective evidence: There was no standard operating procedures (SOP) for buffalo ownership in Ribubonus Estate. The buffalo was in conjunction with harvesting system in the estate and the ownership and maintenance of</p>	<p>Root cause: Estate management is of the opinion that the current SSOP for In-filed FFB Evacuation Using Buffalo has already covered the maintenance and ownership of the buffaloes.</p> <p>Corrective Action: 1. A separate SOP that covers adequately the</p>	<p>The new SOP regrading "Pemilikan & Penjagaan Kerbau" was developed on 20/01/2022 approved by Group Manager was verified by the auditor. Besides that, monthly allowance for buffalo owners RM100 was stated in the new SOP. Sighted also, workout payment salary</p>

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		the buffalo was not clearly stated or not established in any procedure. Based on interview with workers, there some grievances with current system which they have to sell the buffalo themselves if they want to apply for vacation leave or repatriated. Furthermore, monthly maintenance of the buffalo i.e salt, insect sprayer, rope and carrier is currently higher than the allowance they get.	ownership and maintenance of buffaloes had been developed. 2. The monthly allowance for buffalo owners had been increased from RM60 to RM100 with effective January 2022 for Sabah Operations to cover for the buffalo maintenance.	details between December 2021 and January 2022 to showed RM100 has been applied to buffalo owner. Status: Closed
3.4.3 MAR 02 2021	Major	Finding: Social management and monitoring plan was not reviewed and updated for certain issues identified in the CU Objective evidence: Based on social management and monitoring plan reviewed, there was certain issues not identified as follows: 4. Salary payment through bank instead of issuance cheque and the particular cheque will cash out at sundry shop in the estate. Based on interview held with local workers, they most prefer their salary to bank in through bank, to prevent charges from the shop. Furthermore, easy for them to make online transactions to pay their debt or loan because no cash deposit nearby the CU. 5. Regularization of contractor workers especially for undocumented workers. 6. Mechanism of paying the salary not more than 7th of every month for contractor workers.	Root cause: 1. This method has been practiced for many years after replacing salary payment using cash for security reason. 2. This was not registered in the SIA management plan since it was the responsibility of the contractor themselves to ensure only legal foreign workers are employed. 3. Estate management consider it is the responsibilities of the contractors to pay their workers not more than 7 th of every month Corrective Action: The SIA management action plan had been updated (Internal stakeholders item no. 18 – 20) by including these three identified issues on 02/12/2021 and will be monitored/reviewed from time to time to ensure their implementations.	Auditor has verified the SIA management action plan 2021 was reviewed and updated on 02/12/2021 to include all 3 issues highlighted. Estate manager as responsible person to ensure all issues been resolved according to timeline July 2022. Status: Closed.
6.7.2 DA 02 2021	Minor	Finding: The accident and emergency procedures was not in place and monitored. Objective evidence: 1. Emergency case occurs at non operation hours or night time i.e. asthma, heart attack, etc. was not identified and plan yet. 2. During site inspection at Ribubonus POM, Kernel Plant Station, Claybath Operation, sighted chemical spillage (Calcium Carbonate) on underground without preventive maintenance as per ERP Chemical & Fertilizer Spillage.	Root cause: 1. There was no specific ERP for non-working hours as currently the estate or POM management have emergency numbers displayed for such cases, if any. 2. There was a lack of awareness on the need to immediately clean any chemical spillages by the mill and assistant supervisors. Corrective Action: 1. ERP for non-working hours will be developed to include standby vehicle and clinic personnel and ferry operator and socialize the ERP to all staff and workers	Corrective action plan is accepted, and the effectiveness will be verified during next audit. Status: Open.

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			<p>and nearby local villagers. Expected date of completion = 15 March 2022.</p> <p>2. The spillage had been immediately clean up. Training again to workers and staff on ERP chemical spillage. Expected date of completion = 15 December 2021.</p>	
7.8.2 DA 03 2021	Major	<p>Finding: Water courses and wetlands was not fully protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017). Objective evidence: During site inspections at:</p> <ol style="list-style-type: none"> 1. Ribubonus POM Worker Quarters No Unit D4, sighted chemical spraying activities was carried out at the monsoon drains and the compound. 2. Ribubonus Estate, Block 74, sighted chemical spraying activities was carried out close to the water's edge near the riparian reserved. 3. Ribubonus Estate, Block 25, sighted EFB was placed close to the water's edge Main Drain and the EFB was leached to the watercourse. 	<p>Root cause:</p> <ol style="list-style-type: none"> 1. Spraying of herbicides was done without knowledge from the management. The worker has lack of awareness on prohibition of herbicides spraying at the compound. 2. Estate management consider only natural water course are prohibited area that cannot be sprayed with chemicals. <p>The EFB was placed into areas which were already fully applied</p> <p>Corrective Action:</p> <ol style="list-style-type: none"> 1. Memo was circulated all mill housing occupants and also displayed at the notice board. Briefing was conducted during muster to highlight the prohibition on using any type of herbicide at the housing area. 2. An instruction memo had been issued by GM Plantations on the prohibition of spraying near water edges regardless of natural or man-made water courses including EFB mulching. Training based on the latest instruction and revised SSOP Chemical Spraying (5.1.9) had been conducted. 3. Excess applied EFB transferred to other fields. Refresher training based on the latest instruction and revised EFB mulching (13.1.10) had been conducted. 	<p>Auditor has verified the document attached:</p> <ol style="list-style-type: none"> 1. Memo regarding "Larangan meracun di kawasan perumahan" dated 02/12/2021 was circulated to all staffs and workers. 2. Briefing was conducted on 03/06/2021 during muster to highlight the prohibition on using any type of herbicide at the housing area by Mr. Akhilesh Nair (Mill Engineer). 3. Internal action memo from GM Plantations dated 09/11/2021 was cascade to all estates on the prohibition of spraying near water edges regardless of natural or man-made water courses including EFB mulching. 4. Revised SSOP for spraying and EFB mulching/ decanter cake application was implemented promptly by training to all staffs and workers. The trainings were conducted on 29/11/2021, 01/12/2021, 08/12/2021, 16/12/2021. <p>Status: Closed</p>

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Attachment 5

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Spec. Major/ Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
4.1.2 MAR 01 2019 MYNI 2019 3.3.2	Minor	Findings: An occupational and health safety plan that covering all activities has found documented but not effectiveness monitored and implemented. Objective evidence: Based on annual meeting and training program for the year 2018, it was found that the Safety and Health Committee Meeting scheduled to be conducted 4 times per year but it was actually conducted 3 times per year dated 13/4/2018, 30/6/2018 and 28/9/2018.	The yearly meeting scheduled will submit to the ESHS Manager and Sustainability Department for better monitoring and to ensure that the meeting will conduct quarterly.	OSH Committee meetings were held once in three months as per regulations. Verified of the minutes of the meeting: Ribubonus Estate: 16/10/2021, 01/07/2021, 20/03/2021, 12/12/2020, 22/09/2020, 29/06/2020, 14/03/2020. Ribubonus POM: 28/09/2021, 29/06/2021, 24/03/2021, 22/12/2020, 23/09/2020, 22/06/2020, 20/03/2020. Status: Closed
4.7.3 MAR 01 2019 MYNI 2019 6.7.3	Major	Findings: Protective equipment not available to cover the potential hazardous operations such as harvesting. Objective evidence: During site visit made at Block' 10- 2001 (3 harvesters) and Block 69-2002, (3 harvesters) found that protective equipment i.e. goggle is not available at workplace.	A total number of 25 units goggle were issued to the concerned harvester on 24/7/2019 and 27/7/2019 (15 units). Training on the PPE also conducted on 24/7/2019.	All staff and workers such as the storekeepers, harvesters and sprayers/manurers were continuously trained in safe working practices including SSOP for PPE related to their job function. Appropriate PPE were given to workers based on HIRARC and SSOP recommendations suitable for the job position or hazardous operation undertaken. During site visit at Ribubonus Estate at Harvesting Operation (Block 8, Block 64), Circle Spraying Operation (Block 79) and Manuring Operation Block (Block 4, Block 71), sighted they were seen to wearing PPE such as face masks respirators, goggles, harvesting shoes, rubber boots, nitrile/cotton gloves, apron and hard hat, to cover all potentially hazardous operations. The condition of each PPE item and their validity lifespan were found good. Status: Closed
6.5.3 MZK 01 2019	Minor	Findings: Ribubonus Estate does not comply with the requirement of Section10(3) of the Workers' and Amenities Minimum Standards of	The management will provide milk at crèche.	Site inspections at Ribubonus Estate Crèche, observed kids'/baby milks were provided by the estate management free of charge, sufficient

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<p>MYNI 2019 6.2.4</p>		<p>Housing Act 1990. Objective evidence: Toddlers placed at the Ribubonus Estate Crèche are not provided with milk. This contravenes Section 10(3) of the Workers, Minimum standards of Housing and Amenities Act 1990 which requires on each day a dependant is accommodated the nursery, he shall be provided by the employer at his own expense with a supply of milk in sufficient quantity and of good quality.</p>		<p>quantity and of good quality. Status: Closed</p>
<p>TPB 4.5.4 (e) RAR 01 2019 MYNI 2019 TPB 5.5.3 (e)</p>	<p>Minor</p>	<p>Findings: Supporting documentation for self – declamation was in adequate. Objective evidence: Evidences & document reference such as HCV report results, land title, RACP status, LUCA status, planting statement, sop for identifying legal' customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc. was not available for all uncertified management units.</p>	<p>All the required documents will be obtained and expected the self-assessment could be fully completed and received by December 2019.</p>	<p>Wilmar International Limited (WIL) complied with all the requirement. There was no new planting within the properties in WIL The internal audit assessment report has been carried out for clause 4.2.4 (e)-(h) of certification system for units of the following i.e. Indonesia Units, Arica Units and Malaysia Units. 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. Status: Closed</p>

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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	2023	Newly added into Wilmar Membership in 2018, 3 years till certification dateline- waiting for assessor to conduct HCV & SIA – postponed due MCO
10	PPB Oil Palms Berhad	Laba Utama Sdn Bhd -Jebawang Sdn Bhd	Sri Kamusan Palm Oil Mill	Sandakan	2023	Newly acquired in 2019, 3 years till certification dateline waiting for assessor to conduct HCV & SIA – postponed due MCO

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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
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	PT Agro Nusa	ANI Sambas	West Kalimantan	2019	Certified

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	(Sambas)	Investama (Sambas) mill	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	Agronusa Invenstama 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, Indoresin Putra Mandiri	West Kalimantan	2023	Land title issue

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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 Tapani 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
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

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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