



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

File Ref. : EP09760002

RSPO PUBLIC SUMMARY REPORT

CLIENT : TERUSAN 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	
Terusan Certification Unit	Terusan POM	5°49' 54.687" N	117° 20' 30.315" E	Batu 65, Jalan Telupid Labuk/Sugut, Sandakan, Sabah.
	Terusan 1 Estate	5°47' 23.104" N	117° 23' 37.202" E	
	Terusan 2 Estate	5°49' 57.944" N	117° 20' 22.743" E	
	Rumidi Estate	5°55' 59.804" N	117° 18' 43.466" E	

MAP : See Attachment 1

AUDIT DATE : 8-13 November 2021

DURATION : 24 auditor days

TYPE OF AUDIT : ☐ Annual Surveillance Audit No. 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 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

Acknowledgement by Client's Representative

Name : **ROZAIMEE BIN AB RAHMAN**

Name : Foo Siew Theng

Signature :

Signature :

Date :

3/03/2022 (Public Summary)
10/02/2022 (Final Report)

Date :

09 Mar 2021

SUMMARY OF AUDITS

Recertification Audit				
On-site audit date	:	29 – 30 June & 01 July 2020 (REMOTE)	No. of auditor days:	5 Auditor Days
Audit team	:	Dzulfiqar Azmi (TLA), Mohd Razman bin Salim (A), Mohd Zulfakar Kamaruzaman (A)		
No. of major NCR	:	Nil	Indicator: Nil	Closing date: NA
No. of minor NCR	:	1	Indicator: 3.1.3	
Indicate the stakeholders interviewed during the on-site audit	:	Employees	Settlers	Villagers / Local communities
	:			
	:	Contract workers	NGOs	Govt. agency
	:			
	:	Indigenous people	Contractor	Others (Please specify)
Supply base sampled	:	Terusan POM, Terusan 1 Estate, Terusan 2 Estate, Rumidi Estate		
Changes since the last audit	:	Yes, changes on planted area: <ul style="list-style-type: none"> For Terusan 1 Estate, 126.42 ha of planted area has been increased due to adjustment/resurvey ha by Land Survey Body dated 21/12/2019 for replanting area. For Rumidi Estate, 56.45 ha of planted area has been increased due to adjustment/resurvey ha by Land Survey Body dated 21/12/2019 for replanting area. 		
Justification of audit planning	:	Total allocation of auditor days for Terusan CU were: <ul style="list-style-type: none"> Mill = 1 days (For safety and health, environment, mill best practices, GHG verification and for supply chain certification systems) All estate = 2 days each for verification of safety and health, environment, good agriculture best practices, GHG verification. 		
Report approved by	:	Kamini a/p M. Sooriamoorthy		Approval date: NA

Recertification Audit & Annual Surveillance Audit 1				
On-site audit date	:	8-13/11/2021	No. of auditor days:	24 Auditor Days
Audit team	:	Rozaimiee Ab Rahman, Mohd Nordin Ab Jalil, Dzulfiqar Azmi, Ismail Adnan, (Mohd Ab Raof Asis, Mohd Zulfakar Kamaruzaman, Selvasingam T.Kandiah – additional team members to replace Rohazimi Mat Nawi)		
No. of major NCR	:	4	Indicator: 3.6.1, 6.2.3, 7.7.6, 7.8.2	Closing date: 8/2/2022
No. of minor NCR	:	1	Indicator :2.1.2	
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	:	Terusan POM, Terusan 1 Estate, Terusan 2 Estate, Rumidi Estate		
Changes since the last audit	:	No changes		
Justification of audit planning	:	<ul style="list-style-type: none"> Terusan 1/ Terusan 2/ Rumidi Estate = 6 auditor days, monitoring on critical areas such as (HCV areas, buffer zone areas, boundary forest reserve, neighbouring villagers, stakeholder, etc.) verified safety and health, environment, good agriculture best practices, GHG verification, etc Terusan POM = 6 auditor days, for safety and health, environment, mill best practices, GHG verification, etc) + (1 day for supply chain certification systems) 		
Name of peer reviewer	:	Prof Emeritus Dr Jalani Sukaimi		
Report approved by	:	Kamini Sooriamoorthy		Approval date : 3/03/2022

SUMMARY OF INFORMATION

TABLE 1

	RA	ASA 1	ASA 2	ASA 3	ASA 4
Projection Period	July 2020 to October 2021	November 2021 to October 2022			July 2019 to June 2020
Certified FFB Processed (MT)	138,968.55	134,997.67			77,425.93
Production of Certified CPO (MT)	29,523.94	29,699.91			17,131.98
Production of Certified PK (MT)	5,697.58	5,805.32			3,446.02
Certified Areas (Ha)	7,589.57	7,589.57			7,589.57
Planted Areas (Ha)	6,836.85	6,836.85			6,836.85
Production Areas (Ha)	5,321.93	5,321.93			2,664.01
HCV Areas / Conservation Areas (Ha)	311.77	*285.64			311.77
REMARKS	*As updated in August 2021, with new mapping activity.				

TABLE 2

	CPO	CPK
Last years certified volume (MT)	46,655.92	9,143.60
Last years actual certified sold (MT)	38,722.09	8,985.96
Last years actual sold under other schemes (MT)	7,073.27	0
Last years sold conventional (MT)	0	0
Last year actual sold CSPO credits (where applicable)	0	0
New year certified volume (MT)	29,699.91	5,805.32

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1.0 AUDIT PROCESS

1.1 Certification Body

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

SIRIM QAS International has vast experience in conducting audits related to RSPO certification. It has certified more than a hundred palm oil mills and several estates to ISO 14001 & OHSAS 18001. SIRIM QAS International has also conducted many audits for sustainable production of palm oil products against the requirements of the RSPO P&C. SIRIM QAS International was approved by the RSPO as a RSPO certification body on 21 March 2008 and re-accredited by ASI on 3 October 2019 (accredited 2014).

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Rozaimée Ab Rahman	Lead Auditor / Safety, environment & SCCS	Holds a B. Sc. in Agriculture from University Putra Malaysia. He had more than 5 years of working experience in the oil palm operation. He is a qualified RSPO P&C, RSPO Supply Chain and MSPO Lead Auditor.
Dzulfiqar Azmi	Auditor / Safety & Environment, Social	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 qualified as an RSPO Lead Auditor.
Ismail Adnan Abdul Malek	Auditor Social / HCV	Holds a Master of Forestry degree from University of British Columbia, Canada. He had more than 25 years of working experience in the Natural Forest and Plantation Forest operations and management. He is a qualified Lead Auditor in MC&I (Natural Forest and Forest Plantation). He is also an Auditor for RSPO and MSPO (HCVF, Biodiversity, Social)
Mohd Nordin Ab Jalil	Auditor GAP	Holds a B.Sc.in Agriculture from Universiti Pertanian Malaysia. He has over 41 years working experience in the oil palm plantation operation. He is qualified auditor for RSPO P&C.
Mohd Zulfakar Kamaruzaman	Auditor Social, Safety & HCV	Holds a B.Sc. Forestry. He had several years of working experience in the oil palm operation. He is a qualified RSPO P&C, RSPO Supply Chain and MSPO Lead Auditor.

Selvasingam T Kandiah	Auditor GAP & Safety	Holds a B.Sc. of Agriculture University of Agricultural Sciences, Hebbal, Bangalore, India. He had more than 29 years of working experience in plantation management covering cocoa, rubber and oil palm. He is a qualified RSPO P & C and MSOP Lead Auditor.
Mohd Ab Raof Asis	Auditor Social, Safety	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 covered the Terusan Palm Oil Mill and 3 of its supply base, with 100% sampling. The 3 supply base covered during the audit are Terusan 1 Estate, Terusan 2 Estate, and Rumidi Estate. The audit included an on-site audit to the estates, mill 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 on 04/05/2021. In addition, SIRIM QAS International had also sent invitations through letters to the relevant stakeholders, including government agencies and Non-Governmental Organisations (NGOs).

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

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (including migrant workers)	<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"> ▪ All workers signed the employment agreements with the estates/mill. They understood the contents of agreement. ▪ 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. ▪ No abuse at work, and no sexual harassment. They understand what constitutes sexual harassment. ▪ No discrimination between migrant workers and local workers, between male and female workers. ▪ Comfortable housing with water and electricity provided. Have access to affordable food from the canteen/sundry shops within the estate/mill premises. ▪ Entitled to free medical facilities at the estate clinic. ▪ Have representatives who attend regular meetings with the management where they can put forward any complaints and or raise any issues. ▪ They knew the types of work offered at mill & estate when they were in their own countries. All migrant workers keep their own passports.
2) Settlers	NA

	3) Villagers / Local communities (including women representatives, displaced communities)	No negative issues highlighted by stakeholders during the interview. CU has a good reputation with local communities.
	4) Suppliers	NA
	5) Contract workers	Selected suppliers were interviewed to check on issues related to payment to their employees.
	6) Local & national NGOs	NIL
	7) Government agencies / Statutory bodies	NIL
	8) Independent growers / Smallholders	No negative issues highlighted by FFB Suppliers during the interview. Smallholders have freedom to choose any mills to sell their FFBs. Previous and current FFB price has been clearly briefed to smallholder and published in notice board the mill.
	9) Indigenous people	NA
	10) Contractor	Selected suppliers were interviewed to check on issues related to payment to their employees.
	11) Previous land owner (if any)	At Rumidi Estate 56.80 ha excised from SLDB 2 to Kg Gana Jati being settlement of a land claim with the local communities. A meeting on 15 September 2009 between Sapi Plantation Sdn Bhd and affected local communities was held. This meeting was also attended by Land and Survey, Beluran representatives. In that meeting, it was agreed that Sapi Plantations would support the land application of local communities and as of the date of this audit, the land title has been excluded from land title of Rumidi Estate.
	12) Others (please specify)	NA
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 Terusan Certification Unit (CU) is one of the certification unit under the PPB Oil Palms Berhad. The CU consisted of one palm oil mill and three estates, namely the Terusan Palm Oil Mill (hereafter referred to as TPOM), Terusan 1 Estate, Terusan 2 Estate and Rumidi Estate. TPOM commenced its operations in 1995 with a processing capacity of 60 metric tonnes of (FFB) per hour. The total combined land area of the three estates is 7,589.57 hectares (Ha) of which 6,836.85 Ha had been planted with oil palm. As Terusan 1, 2 and Rumidi Estate were fully developed before the year of 2005, Principle 7 of the RSPO P&C is therefore not applicable. Terusan CU has ISCC certification and MSPO beside of RSPO P&C and Supply.

Located in Sandakan District, Sabah, Malaysia, the CU is accessible via the Sandakan – Telupid Road. The CU is about 160 km from the town of Sandakan. The mill and the 3 estates were equipped with living quarters for all its employees.

There were few villages and other oil palm plantations at the vicinity of the CU. Along the northern boundary, there are Kg. Rumidi, Kg. Tendu Batu and Kg. Nangoh. In the west are Kg. Perenchangan, Kg. Bakong-Bakong, Kg. Sualog, Kg. Panimbanan and Kg. Lidong. Kg. Toniting lies at the southern side while the Andamy Plantation is on the west separated by a public road from Terusan 1 and 2 Estate. Adjacent to the Rumidi Estate at the southern boundary is the Bidu-Bidu Forest Reserve.

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

The FFB is sourced from company owned certified estates and third-party supplier. Details of the FFB contribution from each source to the Terusan Palm Oil Mill are shown in the following tables:

Table 1: Actual FFB production by the supply base for the last reporting period July 2019 to June 2020 (ASA 4) and July 2020 to October 2021 (RA)

Estates	FFB Production			
	July 2019 – June 2020		July 2020 – October 2021	
	Tonnes	%	Tonnes	%
Terusan 1	14,361.21	8.03	17,985.48	6.38
Terusan 2	25,461.98	14.24	51,713.51	18.36
Rumidi	18,387.17	10.29	16,481.17	5.85
Sapi Sugut	5,820.00	3.26	7,816.84	2.77
Sekar Imej	8,438.43	4.72	13,117.25	4.66
Hibumas 1	-	-	114.43	0.04
Hibumas 2	152.35	0.09	19,760.65	7.01
Jebawang	39.27	0.02	3,668.96	1.3
Sri Kamusan	-	-	97.80	0.03
Kiabau	-	-	5.11	0.01
WAGS	4,765.52	2.67	8,207.35	2.91
Total certified	77,425.93	43.31	138,968.55	51.94
Non-certified	101,338.61	56.69	142,791.41	48.06
Overall total	178,764.54	100	281,759.96	100

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

CU own estates	FFB Contribution	
	Tonnes	Percentage (%)
Terusan 1	29,958.00	12.7
Terusan 2	95,960.67	40.70
Rumidi Estate	9,079.00	3.84
Total Certified	134,997.67	57.24
Other Supply Bases		
Third parties (non-certified)	100,827.67	42.76
Grand Total	235,825.34	100

Table 3: Actual FFB received and CPO & PK dispatch by Terusan POM for period from July 2019 to June 2020 (ASA 4) and July 2020 to October 2021 (RA)

RSPO Supply Chain Model: Mass Balance	July 2019 – June 2020 (Tonnes)	July 2020 – Oct 2021 (Tonnes)
FFB Received	178,764.54	281,759.96
FFB Processed	178,367.70	281,000.20
Certified FFB Processed	77,425.93	138,968.55
Non-certified FFB Processed	101,112.20	135,412.13
Crude Palm Oil (CPO)		
Overall CPO Production	39,048.14	60,692.91
Certified CPO Production	17,131.98	29,523.94
Certified CPO delivered as RSPO	10,227.76	28,494.33
Certified CPO delivered as non-RSPO	0.00	0.00
Certified CPO delivered under other sustainable schemes	6,872.37	200.90
Palm Kernel (PK)		
Overall PK Production	7,803.52	11,525.36
Certified PK Production	3,446.02	5,697.58
Certified PK delivered as RSPO	3,415.00	5,570.96
Certified PK delivered as non-RSPO	0.00	0.00
Certified PK delivered under other sustainable schemes	0.00	0.00
Credits traded through Books and Claim	0.00	0.00

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

RSPO Supply Chain Model : Mass Balance	Total (MT)
FFB Received	235,825.33
FFB Processed	235,825.33
Certified FFB Processed	134,997.67
Non-certified FFB Processed	100,827.67
Crude Palm Oil (CPO)	
Overall CPO Production	51,881.57
Certified CPO Production	29,699.91
Certified CPO delivered as RSPO	29,699.91
Palm Kernel (PK)	
Overall PK Production	10,140.49
Certified PK Production	5,805.32
Certified PK delivered as RSPO	5,805.32

Table 5 Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Terusan 1 Estate	2,563.16	2,868.90
Terusan 2 estate	3,187.67	3,485.90
Rumidi Estate	1,086.02	1,234.77
Total	6,836.85	7,589.57

Table 6: Planting profile for Terusan 1 Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2015	2 nd Generation	Mature	123.99	4.84
2016	2 nd Generation	Mature	425.36	16.60
2017	2 nd Generation	Mature	427.52	16.68
2018	2 nd Generation	Mature	699.48	27.29
2019	2 nd Generation	Immature	471.88	18.41
2020	2 nd Generation	Immature	414.93	16.19
Total			2563.16	100

Table 7: Planting profile for Terusan 2 Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2014	2 nd Generation	Mature	469.29	14.72
2015	2 nd Generation	Mature	633.68	19.88
2016	2 nd Generation	Mature	621.43	19.49
2017	2 nd Generation	Mature	684.89	21.49
2018	2 nd Generation	Mature	778.38	24.42
Total			3187.67	100

Table 8: Planting profile for Rumidi Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2000	1 st Generation	Mature	50.92	4.69
2002	1 st Generation	Mature	29.32	2.70
2013	2 nd Generation	Mature	284.49	26.20
2014	2 nd Generation	Mature	93.18	8.58
2019	2 nd Generation	Immature	246.02	22.65
2020	2 nd Generation	Immature	382.09	35.18
Total			1086.02	100

2.3 Organizational Information/Contact Person(s)

The details of the contact person are as shown below:

Name	:	FULGENTIUS BERNARD
Position	:	SENIOR MANAGER
Address	:	SAPI PLANTATION SDN.BHD (TERUSAN 2 ESTATE)
Phone no.	:	019-5846258
Fax no.	:	-
Email	:	Fulgentius.bernard@my.wilmar-intl.com

Name	:	MUHADIN MADI
Position	:	MANAGER
Address	:	SAPI PLANTATION SDN.BHD (TERUSAN 1 ESTATE)
Phone no.	:	019-8000246
Fax no.	:	-
Email	:	Muhadin.madi@my.wilmar-intl.com

3.0 AUDIT FINDINGS

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

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

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

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

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

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

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

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

iii.	Are there associated smallholders (including scheme smallholders) in the CU	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
	If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its certification?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
	If no, please state reasons			
	<div style="border: 1px solid black; padding: 2px;"> There is no associated smallholders supplying FFB to the CU Smallholders has been manged by WAGS </div>			
iv.	Any new acquisition which has replaced primary forests or HCV areas	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

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

Only onsite PIC changed. Refer to 2.3 for details.

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)

 In general, all the interviewed stakeholders had given positive feedback on the CU.

4.0 DETAILS OF NON-CONFORMITY REPORT

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

Total no. of minor NCR(s) (details refer to Attachment 4)	List :1 -	DA 01 2021 (2.1.2)
Total no. of major NCR(s) (details refer to Attachment 4)	List :4	DA 02 2021 (3.6.1), RAR 01 2021 (6.2.3), MNAJ 01 2021 (7.7.6), DA 03 2021 (7.8.2)

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

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

5.0 AUDIT CONCLUSION

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

6.0 RECOMMENDATION

☐

No NCR recorded. Recommended to continue certification.

☒

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

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

☒

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

☒

Recommended to continue certification.

☐

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

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

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

Audit Team Leader : ROZAIMEE BIN AB RAHMAN



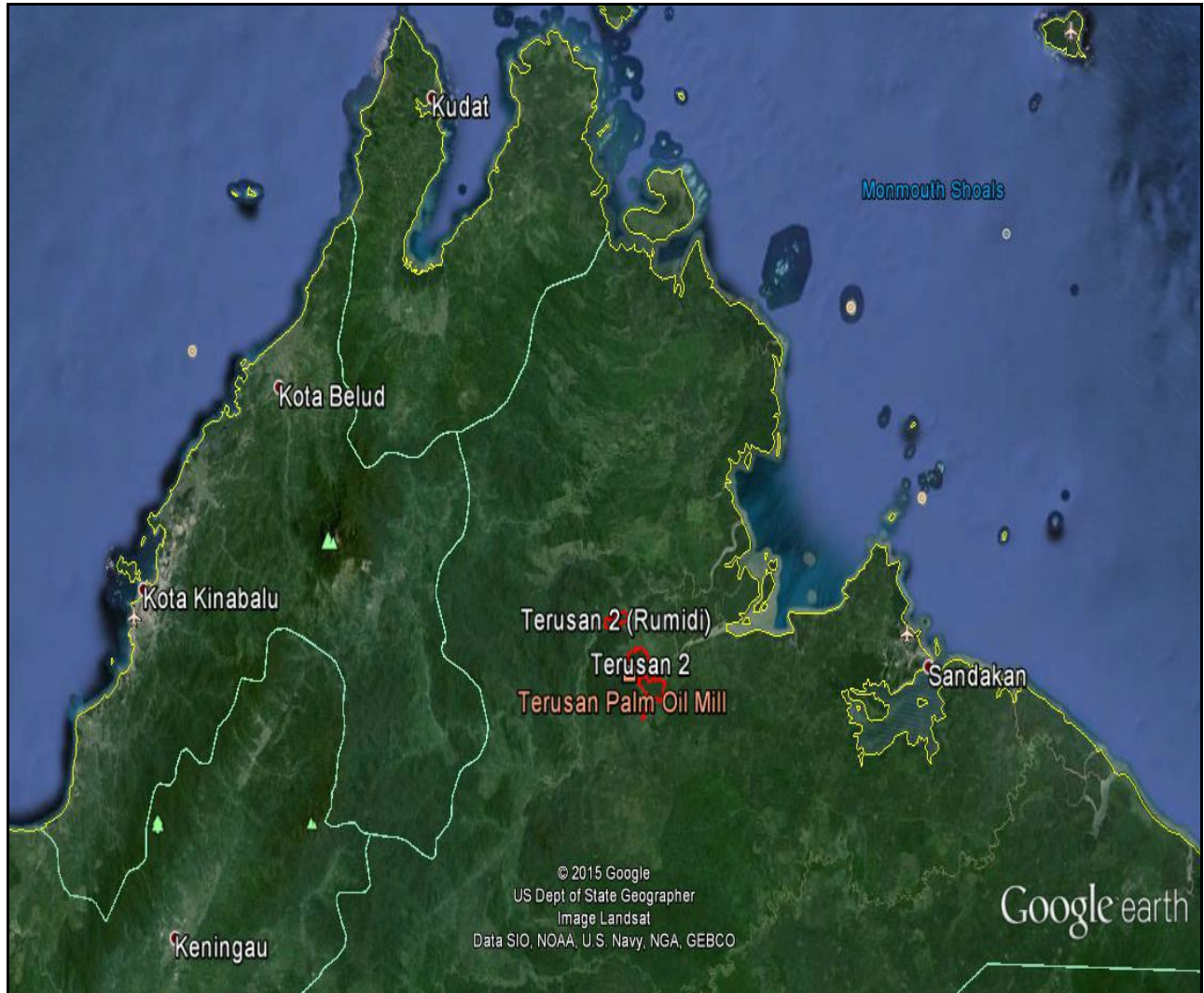
8/02/2022

(Name)

(Signature)

(Date)

Location map of Terusan Certification Unit





ANNUAL SURVEILLANCE 1 AUDIT PLAN

1. Objectives

The objectives of the audit are as follows:

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

2. **Date of assessment** : 8-12 November 2021 (amend – 8-13/11/2021)

3. **Site of assessment** : Terusan CU
 i) Terusan POM (**POM**)
 ii) Terusan 1 Estate (**T1E**)
 iii) Terusan 2 Estate (**T2E**)
 iv) Rumidi Estate (**RE**)

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

5. Reference Standard:

- a. MYNI 2019 of RSPO P&C 2018
- b. RSPO Certification Systems, June 2017
- c. Company's audit criteria including Company's Manual/Procedures

6. Assessment Team

- (i) Audit Team Leader : Rozaimie Ab Rahman (**RAR**) – social (stakeholder) , SCCS,
- (ii) Auditor : i) Rohazimi Mat Nawi (**RMN**) – (**not attend-Covid 19 closed contact**)
 ii) Ismail Adnan (**IA**) – Social (workers) & HCV
 iii) Dzulfikar Azmi (**DA**) – Social (workers) & safety & GHG
 iv) Mohd Nordin Ab Jalil – (**MNAJ**) GAP & Safety
 Additional team join on 13/11/2021
 -Mohd Ab Raof Asis – Social –
 -Mohd Zulfakar Kamaruzaman – (Safety, HCV, & environment)
 -Selvasingam Tkandiah – (safety & GAP)

(iii) Witnessed (ASI) : nil

(iv) Technical expert : nil

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 including observation of practices, interviews with interested parties (all categories of contractors, employees, nearby population, etc.), documentation evaluation 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. Repeated major non-compliance in consecutive audits will also resulted in recommendation for suspension.

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

9. Confidentiality Requirements

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

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

10. Working Language : English and Bahasa Malaysia

11. Reporting

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

12. Facilities Required

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

13. Assessment Programme Details : As below

Day 1: 8 November 2021 (Monday)

Time	Activities / areas to be visited				Auditee
8.00am	Opening Meeting – Audit team introduction and briefing on assessment objectives, scope, methodology, criteria and programmes by SIRIM QAS Audit Team Leader. : venue : (Decided by Management)				Management Representative
8.30am	Organization Representative - Briefing on RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases, Time bound plan, actions taken to address previous audit findings. Logistics discussion to the sites to be visited.				
9.00am	To assign each audit team members – site and the P&C requirements				
	IA (POM) Site visit and assessment on implementation: <ul style="list-style-type: none">Social aspects - SIA, management plan & implementation, workers' quarters.Interview with gender committee, worker representative, contractors, supplier, etcLinesite inspectionComplaints and grievances	DA (POM) <ul style="list-style-type: none">Good Milling practicesIPM implementation, training and safe use of agro-chemicals.Occupational safety & health practice– witness activities at siteInterview with workers, safety committee and contractorsConsultation with relevant government /NGO / agenciesGHG verification	RAR (POM) Site visit and assessment on Supply Chain Implementation incl. the Model used <ul style="list-style-type: none">General Chain of CustodySystem Requirements for the supply chainDocumented proceduresPurchasing and goods inOutsourcing activitySales and goods outProcessingRecords keepingRegistrationTrainingClaimsInterview with PIC SCCS, contractors, etc.	RMN (POM) <ul style="list-style-type: none">Good Milling practicesOccupational safety & health practicewitness activities at siteInterview with workers, safety committee and contractorsFinal discharge monitoringMonitoring on environmental complianceLegal compliance	Guide(s) for each auditor
1.00pm	LUNCH BREAK / ZUHUR PRAYER				All
2.00pm	Continue assessment at POM				
4.30 - 5.00pm	Audit team discussion / Debrief meeting with client on issues (if any) / End of Day 1 audit				All
9.00 – 9.30pm	Discussion on potential NCRs				Audit team only

Day 2: 09 November 2021 (Tuesday)

Time	Activities / areas to be visited					Auditee
8.00am	Overview of current activities at Supply base sites. To assign each audit team members – site and the P&C requirements					Respective Manager
8.30am	To assign each audit team members – site and the P&C requirements					Guide(s) for each auditor
	IA (T 1 E) <ul style="list-style-type: none"> Social aspects - SIA, management plan & implementation, workers' quarters. Stakeholder consultation with affected communities surrounding the CU Interview with gender committee, worker representative, contractors, supplier, etc Complaints and 	DA (T1E) <ul style="list-style-type: none"> Social aspects - SIA, management plan & implementation, workers' quarters. Interview with gender committee, worker representative, contractors, supplier, etc Linesite inspection Complaints and grievances training and safe use of agro-chemicals. Occupational 	RAR (POM & T1E) <ul style="list-style-type: none"> Stakeholder consultation with affected communities surrounding the CU Interview with gender committee, worker representative, contractors, supplier, etc Stakeholder consultation with affected communities surrounding the CU Legal 	RMN (T1E) <ul style="list-style-type: none"> Occupational safety & health practice witness activities at site Interview with workers, safety committee and contractors training and safe use of agro-chemicals. Occupational safety & health practice-witness 	MNAJ (T1E) <ul style="list-style-type: none"> Plantation on hilly/ swampy/ peat area IPM implementation, training and safe use of agro-chemicals. Occupational safety & health practice-witness activities at site Interview with workers, safety committee and contractors Good agriculture practices monitoring. 	

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	<ul style="list-style-type: none"> grievances • Consultation with relevant government agencies • Continuous improvement • Inspection of protected sites with HCV attributes • Forested area, plantation • boundary, adjacent and n • neighbouring land use, • HCV Assessment management plan & implementation 	<ul style="list-style-type: none"> safety & health practice-witness activities at site • Linesite inspection • Ghg verification 	compliance	activities at site	<ul style="list-style-type: none"> • New planting • Peat inventory / drain ability assessment 	
1.00p m	LUNCH BREAK / ZUHUR PRAYER					All
2.00p m	Continue assessment at POM/Estate					
4.30 - 5.00p m	Audit team discussion / Debrief meeting with client on issues (if any) / End of Day 2 audit					All
9.00 – 10.00 pm	Discussion on finalization of draft NCRs					Audit team only

Day 3: 10 November 2021 (Wednesday)

Time	Activities / areas to be visited					Auditee
8.00a m	Overview of current activities at Supply base sites. To assign each audit team members – site and the P&C requirements					Respective Manager
8.30a m	To assign each audit team members – site and the P&C requirements					Guide(s) for each auditor
	IA (T 2 E)	DA (T2E)	RAR (T2E)	RMN (T2E)	MNAJ (T2E)	
	<ul style="list-style-type: none"> • Social aspects - SIA, management plan & implementation, workers' quarters. • Stakeholder consultation with affected communities surrounding the CU • Interview with gender committee, worker representative, contractors, supplier, etc • Complaints and grievances • Consultation with relevant government 	<ul style="list-style-type: none"> • Social aspects - SIA, management plan & implementation, workers' quarters. • Interview with gender committee, worker representative, contractors, supplier, etc • Linesite inspection • Complaints and grievances • training and safe use of agro-chemicals. • Occupational safety & health practice-witness activities at site • Linesite inspection 	<ul style="list-style-type: none"> • Stakeholder consultation with affected communities surrounding the CU • Interview with gender committee, worker representative, contractors, supplier, etc • Stakeholder consultation with affected communities surrounding the CU • Legal compliance 	<ul style="list-style-type: none"> • Occupational safety & health practice witness activities at site • Interview with workers, safety committee and contractors • training and safe use of agro-chemicals. • Occupational safety & health practice-witness activities at site 	<ul style="list-style-type: none"> • Plantation on hilly/ swampy/ peat area • IPM implementation, training and safe use of agro-chemicals. • Occupational safety & health practice-witness activities at site • Interview with workers, safety committee and contractors • Good agriculture practices monitoring. • New planting 	

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	<ul style="list-style-type: none"> agencies Continuous improvement Inspection of protected sites with HCV attributes Forested area, plantation boundary, adjacent and n neighbouring land use, HCV Assessment management plan & implementation 	<ul style="list-style-type: none"> GHG verification 				
1.00pm	LUNCH BREAK / ZUHUR PRAYER					All
2.00pm	Continue assessment at POM/Estate					
4.30 - 5.00pm	Audit team discussion / Debrief meeting with client on issues (if any) / End of Day 3 audit					All
9.00 – 10.00 pm	Discussion on finalization of draft NCRs					Audit team only

Day 4: 11 November 2021 (Thursday)

Time	Activities / areas to be visited					Auditee
8.00 am	Overview of current activities at Supply base sites. To assign each audit team members – site and the P&C requirements					Respective Manager
8.30 am	To assign each audit team members – site and the P&C requirements					Guide(s) for each auditor
	IA (RE)	DA (RE)	RAR (RE)	RMN (RE)	MNAJ (RE)	
	<ul style="list-style-type: none"> Social aspects - SIA, management plan & implementation, workers' quarters. Stakeholder consultation with affected communities surrounding the CU Interview with gender committee, worker representative, contractors, supplier, etc Linesite inspection Complaints and grievances training and safe use of agro-chemicals. Occupational safety & health practice-witness activities at site Linesite inspection 	<ul style="list-style-type: none"> Social aspects - SIA, management plan & implementation, workers' quarters. Interview with gender committee, worker representative, contractors, supplier, etc Linesite inspection Complaints and grievances training and safe use of agro-chemicals. Occupational safety & health practice-witness activities at site Linesite inspection 	<ul style="list-style-type: none"> Stakeholder consultation with affected communities surrounding the CU Interview with gender committee, worker representative, contractors, supplier, etc Stakeholder consultation with affected communities surrounding the CU 	<ul style="list-style-type: none"> Occupational safety & health practice witness activities at site Interview with workers, safety committee and contractors training and safe use of agro-chemicals. Occupational safety & health practice-witness activities at site 	<ul style="list-style-type: none"> Plantation on hilly/ swampy/ peat area IPM implementation, training and safe use of agro-chemicals. Occupational safety & health practice-witness activities at site Interview with workers, safety committee and contractors Good agriculture practices monitoring. New planting 	

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	<ul style="list-style-type: none"> Inspection of protected sites with HCV attributes Forested area, plantation boundary, adjacent and n neighbouring land use, HCV Assessment management plan & implementation 					
1.00 pm	LUNCH BREAK / ZUHUR PRAYER					All
2.00 pm	Continue assessment at POM/Estate					
4.30 - 5.00 pm	Audit team discussion / Debrief meeting with client on issues (if any) / End of Day 4 audit					All
9.00 – 10.00 pm	Discussion on finalization of draft NCRs					Audit team only

Day 5: 12 November 2021 (Friday)

Time	Activities / areas to be visited					Auditee
8.00 am	Overview of current activities at Supply base sites. To assign each audit team members – site and the P&C requirements					Respective Manager
8.30 am	To Continue unfinished assessment at POM/Estate – each auditor will brief which estate or mill will sample during the audit					Guide(s) for each auditor
	IA	DA	RAR	RMN	MNAJ	
	<ul style="list-style-type: none"> Social aspects - SIA, management plan & implementation, workers' quarters. Stakeholder consultation with affected communities surrounding the CU Interview with gender committee, worker representative, contractors, supplier, etc Complaints and grievances Consultation with relevant government agencies Continuous improvement Inspection of protected sites with HCV attributes Forested area, plantation boundary, adjacent and neighbouring land 	<ul style="list-style-type: none"> Social aspects - SIA, management plan & implementation, workers' quarters. Interview with gender committee, worker representative, contractors, supplier, etc Linesite inspection Complaints and grievances training and safe use of agro-chemicals. Occupational safety & health practice-witness activities at site Linesite inspection 	<ul style="list-style-type: none"> Stakeholder consultation with affected communities surrounding the CU Interview with gender committee, worker representative, contractors, supplier, etc Stakeholder consultation with affected communities surrounding the CU 	<ul style="list-style-type: none"> Occupational safety & health practice witness activities at site Interview with workers, safety committee and contractors training and safe use of agro-chemicals. Occupational safety & health practice-witness activities at site 	<ul style="list-style-type: none"> Plantation on hilly/ swampy/ peat area IPM implementation, training and safe use of agro-chemicals. Occupational safety & health practice-witness activities at site Interview with workers, safety committee and contractors Good agriculture practices monitoring. New planting 	

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	<ul style="list-style-type: none"> use, HCV Assessment management plan & implementation 					
12.00pm	LUNCH BREAK / JUMAAT PRAYER					All
2.00pm	Continue assessment at POM/Estate					
3.30 - 4.00pm	Audit team discussion / Debrief meeting with client on issues (if any) / End of Day 5 audit					All
4.00 - 5.00pm	<ul style="list-style-type: none"> Closing meeting – venue at (decide by management), Presentation of audit findings, positive comment, Question & answer 					All

Day 6: 13 November 2021 (Saturday)

Time	Activities / areas to be visited					Auditee
8.00 am	Overview of current activities at Supply base sites. To assign each audit team members – site and the P&C requirements					Respective Manager
8.30 am	To Continue unfinished assessment at POM/Estate – each auditor will brief which estate or mill will sample during the audit					Guide(s) for each auditor
	MZK	DA	RAR	MAR	STK	
	<ul style="list-style-type: none"> Social aspects - SIA, management plan & implementation, workers' quarters. Stakeholder consultation with affected communities surrounding the CU Interview with gender committee, worker representative, contractors, supplier, etc Complaints and grievances Consultation with relevant government agencies Continuous improvement Inspection of protected sites with HCV attributes Forested area, plantation boundary, adjacent and neighbouring land use, HCV Assessment 	<ul style="list-style-type: none"> Social aspects - SIA, management plan & implementation, workers' quarters. Interview with gender committee, worker representative, contractors, supplier, etc Linesite inspection Complaints and grievances training and safe use of agro-chemicals. Occupational safety & health practice-witness activities at site Linesite inspection 	<ul style="list-style-type: none"> Stakeholder consultation with affected communities surrounding the CU Interview with gender committee, worker representative, contractors, supplier, etc Stakeholder consultation with affected communities surrounding the CU 	<ul style="list-style-type: none"> Occupational safety & health practice witness activities at site Interview with workers, safety committee and contractors training and safe use of agro-chemicals. Occupational safety & health practice-witness activities at site 	<ul style="list-style-type: none"> Plantation on hilly/ swampy/ peat area IPM implementation, training and safe use of agro-chemicals. Occupational safety & health practice-witness activities at site Interview with workers, safety committee and contractors Good agriculture practices monitoring. New planting 	

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	management plan & implementation					
12.00pm	LUNCH BREAK / JUMAAT PRAYER					All
2.00pm	Continue assessment at POM/Estate					
3.30 - 4.00pm	Audit team discussion / Debrief meeting with client on issues (if any) / End of Day 5 audit					All
4.00 - 5.00pm	<ul style="list-style-type: none"> Closing meeting – venue at (decide by management), Presentation of audit findings, positive comment, Question & answer 					All

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Attachment 3

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

Principle 1: Behave ethically and transparently

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

Clause	Indicators	Comply Yes/No	Findings
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	YES	Terusan 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. Terusan 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.
	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 https://www.wilmar-international.com/
	1.1.3 (C) Records of requests for information and responses are maintained.	YES	Records of communication were identified and maintained in different files depending on the stakeholder. For these records it was evident that the Terusan CU kept and maintained requests for information and responses. There was evidence that the Terusan CU keeps and maintains requests for information and responses. And at the Terusan Palm Oil Mill, these documents and requests were kept in the Public Information Request Form and Procedure file.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	YES	The consultation and communication procedure used within Terusan CU is Document No RSPO 6.2. This SOP was documented and made available during the audit, and is used by Consultation and Communications Procedure.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	YES	Stakeholder Lists for all estates and Mill at the CU were sighted. The CU continued to maintain and updated the stakeholder's information (name of parties, address, contact number, nominated representatives) which included the contractors, vendors/suppliers, foreign recruitment agencies, embassy, government agencies, schools, local communities, CPO/PK customers, and others.
1.2 The unit of certification commits to ethical conduct in	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	YES	Terusan 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

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Clause	Indicators	Comply Yes/No	Findings
all business operations and transactions.			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.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	YES	This is available in the PPB Oil Palms Berhad Operating Procedures Checklist 2019. One of the objectives of this SOP checklist is to prevent and detect fraud.

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	Generally, Terusan CU has complied with the applicable legal requirements.
	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.	NO	The "Register of Legal and Other Applicable Requirement" was made available at Terusan CU. The document reviewed by the Sustainability Unit. However, a documented system for ensuring legal compliance was not in place under Occupational Safety and Health (Noise Exposure) Regulation 2019. Terusan 1 Estate, Terusan 2 Estate and Rumidi Estate yet to be carried out the audiometry test for tractor driver and road maintenance worker as per recommendation by Noise Risk Assessment Report. Therefore, Minor NCR DA 01 2021 was raised.
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	YES	Sighted a pegging with paint red and white colour has been maintained visibly along the boundary. CU also has a boundary drainage for maintained the legal boundary.
2.2 All contractors providing operational services and	2.2.1 A list of contracted parties is maintained.	YES	The list of contracted parties was available in each unit in its respective stakeholder list. The lists contain name of contractors, designated contact persons, address, telephone/fax/email and type of contracted works done.

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Clause	Indicators	Comply Yes/No	Findings
supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	YES	Evidence of legal due diligence of all contracted third parties has been established and monitored by CU through contractor monitoring list. Among of due diligence has been conducted such as: <ul style="list-style-type: none"> • Pay slip monitoring • Insurance validity • Trading license • Passport & IC • List of workers • Contract agreement
	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	Each contract issued to suppliers and contractors contain a clause requiring compliance with legal requirements.
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	Terusan POM has established data from all the directly source of FFB. Among of information has been recorded such as: <ol style="list-style-type: none"> a) Information on geo-location of FFB origins. b) Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder The evidence of currently document was available in the 'Smallholder Mapping'. At present the mill only possessed the valid MPOB licenses for all the directly source FFB as verified by the auditor.
	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	The evidence of document was available in the 'Smallholder Mapping'. At present the mill has possessed all the valid MPOB licenses for all the directly source FFB as verified by the auditor. Detail sources of FFB geo location as per indicator 2.3.1 above.

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

Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.	3.1.1 (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	YES	All 3 estates at Terusan CU continued to be committed to long-term economic and financial viability. The Estates had management plans in their current year's budgets and projections. The annual budgets and projections were prepared on an annual basis before the end of current year. The yearly budget and projections where the cost of production was reviewed annually and compared against expenditure for each year was an on-going process. The parameters monitored remained essentially unchanged and included Capital (CAPEX) and Operating costs. The operating expenditure included expenditure for Replanting, Mature and Immature Oil Palm upkeep, Administration cost, Housing and Machinery upkeep, allocation for sustainability implementation (environmental, social, occupational safety and health), infra-structure development (roads, etc.), and training etc.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	Terusan CU had established and documented a management plan (budget) inclusive of a long-range replanting program from 2021 to 2031. This management plan inclusive of the replanting program was reviewed annually. The decision for replanting was based on factors like FFB crop availability for the mill, Yield, Height & Age of palms, market price of CPO, etc.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	YES	Terusan CU held management reviews at planned intervals to discuss on issues related to sustainability such as Terusan CU meeting (mill and its supply bases), Estate meeting (estates within Terusan CU) and operation meeting (estate manager and estate key personnel) for effective implementation of RSPO. The management reviews were carried out in Oct 2021.
3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	YES	The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.
	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	YES	Auditor has verified all the data in metric template report and the information given was accurate as per reported.

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Clause	Indicators	Comply Yes/No	Findings
3.3 Operating procedures are appropriately documented, consistently implemented and monitored.	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	YES	All 3 estates in Terusan CU had in place the mechanism to check consistent implementation of procedures. All 3 estates had lists of SOPs and monitored good agricultural practices as per SOPs by on-site visits, inspections and discussions with relevant personnel and by conducting Assessments and audits like Internal Audits, Agronomist visits and by RSPO Audits. Implementation is also monitored by Group Manager, General Manager and Plantation Head. It was also noted that relevant SOPs were displayed at various workstations for easy reference, for example, at the muster ground, workshop, riparian buffer zone, chemical storage and diesel storage.
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	YES	Terusan CU continued to implement the mechanism to ensure consistent implementation of operation as per SOPs. The mechanisms to check the implementation of procedures were carried out through RSPO internal audit report simultaneously by Sustainability Team. Safety and health meeting and routine inspection (workplace inspection) by assistant manager, staff and hospital assistant.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	YES	Records of monitoring and the actions taken by the Terusan CU continued to be maintained. This is to ensure that the established procedures were consistently implemented. The monitoring system of having Plantation Head's visit to the estate and other audits by Sustainability team and Agronomist to ensure compliance against Company policies and procedures in relation to operations, finance, safety, health and welfare requirements.
3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	YES	There was no new planting in Terusan 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 affected stakeholders.	YES	For Terusan CU, the SIA and EIA reports separated. Significant environmental aspect and impact mitigation methods was implemented from EAI Evaluation Form. Those activities evaluated as significant were then monitored using the management control and mitigation measure established for each activity where the significant impacts occurred. The EAI assessments had included the identification of aspects and impacts from resulting from the POM and estate operations. EAI for Terusan POM has been updated and reviewed in June 2019 regarding Construction of New ESP System. The EAI specific impacts identified include smoke emissions, noise levels, POME, EFB management, Biogas and ESP System. Data were collected and analysed for compliance with relevant regulations and further actions needed were documented and implemented. There are no significant changes from the current EAI established practice. Due to no changes identified in the mill operation,

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Clause	Indicators	Comply Yes/No	Findings
			therefore no timetable for any change is required. The Social Impact Assessment (SIA) for Terusan Oil Palm Plantations and Terusan Palm Oil Mill of PPB Oil Palm Berhad (Sabah) was prepared by Sustainability Unit, EMU, in April 2009. Records of meetings, attendance and findings are duly documented and filed. The SIA covers aspects such as population, demographic profiles, economic activities, education level, living standard and income distribution, water supply source, infrastructure, grievances and complaints, safety and health and wellbeing of workplace, etc. Based on the report and attendance record, the SIA was carried out with the participation of the relevant stakeholders such as contractors and suppliers, government agencies, school. Latest stakeholder's consultation for Terusan CU was conducted in May 2021 with participants of external and internal stakeholders.
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	YES	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. The reviews done had involved respective Managers, Assistants and Sustainability Team with external stakeholders such as from Govt. agencies, neighbouring estates, local communities, suppliers and contractors.
3.5 A system for managing human resources is in place.	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.	YES	Employment procedures which include recruitment, selection and hiring are contained in a document entitled Recruitment of Workers PPB/HR/RSPO. For matters related to termination of employment and retirement, these are contained in employment contracts, which are available to workers and their representatives.
	3.5.2 Employment procedures are implemented, and records are maintained.	YES	Based on the sampling of the workers' employment contracts and personal files, there is evidence that the employment procedures on recruitment, selection, hiring, promotion are implemented, and records maintained. No termination has been carried out, and so this could not be verified during the audit. Hiring process of submitting job application, interviews, medical check-ups, issuance of offer letters, and performance assessments were sighted for Malaysian workers.
3.6 An occupational health and safety (H&S) plan is documented, effectively communicated and	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	NO	The hazard identification, risk assessment and risk control (HIRARC) procedure has been established. Terusan CU have conducted the risk assessment on all its operation as well as determining their control measures. However, an Occupational Health and Safety (H&S) plan was not fully implemented: 1) Water Management in Peat Soil and Acid Sulfate Soil operations was not risk assessed yet to identify H&S issues. 2) Mitigation plans HIRARC at Terusan POM regarding Shovel and Tractor (Landini)

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Clause	Indicators	Comply Yes/No	Findings
implemented.			<p>activities was not implemented and monitored.</p> <p>Objectives evidences:</p> <ol style="list-style-type: none"> 1) Water management operations at estates i.e. water gate activities, stop off/stop bund activities, water level marker monitoring, etc. was not risk assessed yet to identify H&S issues. 2) During site verification at Terusan POM, sighted 3 Tractor Drivers from (FFB Supplier) Andamy Properties Sdn. Bhd., Tractor No. were not wearing appropriate personal protective equipment (PPE) i.e. safety helmet and reflector safety vest when entering the Terusan POM upon sending the FFB and collecting the EFB as per recommended by HIRARC. <p>Hence, Major NCR DA 02 2021 was raised.</p>
	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 Terusan 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.
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	YES	A documented program that provided training for all staff and workers which took into account gender-specific needs, and which covered applicable aspects of the RSPO P&C was available on all 3 Estates and Terusan POM. Regular assessments of training needs were prepared by HR Department and transferred down to the estates and mills for implementation. Training needs are formalised using <i>training needs assessment form</i> . Training needs identification matrix has been established with target dates for the training to be conducted. The training program for 2021 covering all aspects of the RSPO Principles and Criteria and other essential operations activities has been established.
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	YES	A documented program that provided training for all staff and workers which took into account gender-specific needs, and which covered applicable aspects of the RSPO P&C was available on all 3 Estates and Terusan POM. Regular assessments of training needs were prepared by HR Department and transferred down to the estates and mills for implementation.
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	YES	RSPO and RSPO (SCCS) training was provided to all personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) at the Terusan CU in June 2021 by internal trainer.

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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 Cert for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, the inly MB Module is applicable.	YES	Not applicable since this mill is Mass Balance.
3.8.2	Mass balance Module A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3 rd party certified supply base.	YES	Terusan POM received certified FFB from own Estate Which is Terusan 1 Estate, Terusan 2 Estate and Rumidi Estate and Outsider Crop consist of 32 Grower and 74 Smallholder and 5 collecting center. Thus, Terusan 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	The estimated tonnage of CPO and PK products that	YES	Projection data available as in Table 4-MB of this report.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	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.		
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).	YES	The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. The registration information were: RSPO membership no : 2-0017-05-000-00 Registered under parent company: WILMAR INTERNATIONAL LIMITED Register under name : Terusan Palm Oil Mill

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.5	<p>The site shall have written proc and/or work instructions to ensure the implementation of all elements of the applicable SC model specified. This shall include at min the following:</p> <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the SC model req. • Complete and up to date records and reports that demo compliance with the SC model req). • Identification of the role of the person having overall responsibility for and authority over the implementation of these req and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the org's proc for the implementation of this standard. • The site shall have proc for rcvg & cessing certified and non-certified FFBs. 	YES	<p>Terusan POM procedure dated 1 February 2020 [TPOM-RSPO-SCC] 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 - Purchasing and Goods In - Outsourcing - Sales and Goods Out - Registration of Transactions - Training - Record Keeping - Claims - Complaints Procedure - Internal Audit - management Review - Supply Chain Model – Mass Balance - GHG Tabulation for RSPO Certified Palm Oil Mill - Appendix A <p>- The Mill Manager have overall responsible and authority over the implementation of RSPO supply chain requirement in RSPO Terusan POM. Sighted appointment letter dated in Sept 2021. Interview with sustainability committee member, mill manager, assistant mill manager & weighbridge operator was confirmed they are understood the supply chain requirements.</p> <p>- RSPO and RSPO (SCCS) training was provided to all personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) at the Terusan in June 2021.</p> <p>- Training Plan has been developed for the year of 2021</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
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 	YES	<p>As describe under [TPOM-RSPO-SCC TPOM) which is follow the RSPO Supply Chain Certification Standard requirements.</p> <p>Audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard requirements.</p> <p>RSPO internal audit was conducted in Dec 2020 by the internal auditor. 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 were raised by auditor. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor. Documented procedure has defined management review will be conducted once a year</p> <p>Management review meeting has been conducted in March 2021 (combine RSPO, RSPO SCCS and MSPO)</p> <ul style="list-style-type: none"> Internal audit – 0 NCR (SCCS only) Customer feedback – data analysis show result from customer survey (i.e. RSPO-CSPO related to meeting the contract volume, timely delivery, dispatch documentation) result achieved. Previous meeting – was highlighted Changes – There is no significant changes accept transfer of Assistant Manager. Recommendation for improvement – improve the established system

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	records and reports.		
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>TPOM had continued to receive certified FFB from own Estate Which is Terusan 1 Estate, Terusan 2 Estate and Rumidi Estate and Outsider Crop consist of 32 Grower and 74 Smallholder and 5 collecting center. 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 <i>"RSPO & MSPO Mass Balance"</i> 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 minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single-documents or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documentation and specification documentation):</p> <ul style="list-style-type: none"> 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 	YES	<p>The procedure in handling of sale and delivery was sighted and found adequate. Sales activities usually handled by PPB Oil Palms Berhad and Marketing Department (HQ) on behalf of Terusan POM.</p> <p>From July 2019 - October 2021, Terusan POM had delivered CPO MB to 1 buyer only (Sandakan Edible Oils Sdn Bhd.) and of PK MB to 1 buyer only (Sandakan Edible Oils Sdn Bhd.).</p> <p>Sample of deliveries document were sighted during the audit and it was found all related information were adequate. Terusan POM RSPO certificate number and product name together with model used were stated in the delivery documents.</p> <p>Documented procedures related to sales and goods out were sighted and found adequate. Based on verification during the audit, BPOM has deliver certified materials to end buyer such as Lahad Datu Edible Oil Sdn Bhd (KCP), and Sandakan Edible Oil Sdn Bhd. Therefore, following are sample of certified CPO & PK sales which comply to standard requirement.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	MB or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation i) A unique identification number		

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.9	<p>Outsourcing Activities</p> <p>(i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification.</p> <p>(ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p>	YES	<p>a) There are 1 outsource company CPO and PK transporter.</p> <p>b) There is contract document between Terusan POM and the transporters. Sighted in the contract clause 8. – contractors responsibility, contractor agrees that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The RSPO Supply Chain procedure has described and briefed to the contractor in Aug 2021 and during stakeholder meeting in May 2021.</p> <p>d) There is contract document between Terusan POM and the transporters. Sighted in the contract clause 8. – contractors responsibility, contractor agrees that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary</p>

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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 in the stakeholder list and was updated on January 2021
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	YES	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.
	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	YES	Relevant record was maintained for more than 2 years as per Standard operating TPOM-RSPO-SCC

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	products held in stock.		
	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.	NA	Not applicable.
	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.	YES	TPOM has maintained the three-monthly basis accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK. Record titled as <i>"RSPO & MSPO Mass Balancing Record for Oil Mills. The Mass Balance Record for Oil Mills –SKPOM indicated both positive balances for the certified CPO and palm kernel"</i>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.)		
3.8.13	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	Terusan 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). 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.
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	NA	
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures	NA	Not Applicable since this mill is MB Mill

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	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.		
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform</p>	YES	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.
3.8.17	<p>Claims</p> <p>The mill shall only make</p>	YES	Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. Terusan POM has not use RSPO corporate logo as well as trademark logo.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.		

Principle 4: Respect community and human rights and deliver benefits

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

Clause	Indicators	Comply Yes/No	Findings
4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	YES	Policy to protect human rights is contained in Human Rights Policy reviewed in January 2018 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.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	YES	As observed during the audit, and in interviews held with local communities and workers, there is no evidence of instigation of violence, harassment or use of mercenaries or paramilitaries in any of the operations at Terusan CU.
4.2 There is a mutually agreed and documented system for dealing with complaints and	4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants,	YES	Evidence is available of a system open to all affected parties, ensuring anonymity of complainants. This system is known as Dispute and Resolution Procedure. This procedure applies to negotiation procedures involving external and internal stakeholders, and also explains the Group's conflict resolution process in a flowchart. Protection for HRD and community spokesperson is also provided under the Wilmar Group's Whistleblower Policy.

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Clause	Indicators	Comply Yes/No	Findings
grievances, which is implemented and accepted by all affected parties.	HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.		
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	YES	Procedures are in place to ensure affected parties understand the Dispute and Resolution Procedures. Verbal explanation is given in an easy-to-understand language accompanied by pictorial explanations, and where relevant, flowcharts. If necessary, senior foreign workers who could speak and understand the Bahasa Malaysia act as translators to their other colleagues, especially the newly arrived ones.
	4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	YES	There is evidence that Terusan CU keeps parties to a grievance informed of progress. Also sighted in the complaints book was the Manager's approval for repair given on the same date. This status progress was updated and acknowledged by the complainant by appending his signature in the complaint book.
	4.2.4 The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	YES	The conflict resolution mechanism does have an option for aggrieved parties to have the option for representatives of their choice. This is contained in Clause 6.2 (iii) of the Dispute and Resolution Procedure. At Rumidi Estate 56.80 ha excised from SLDB 2 to Kg Gana Jati being settlement of a land claim with the local communities. A meeting in September 2009 between Sapi Plantation Sdn Bhd and affected local communities was held. This meeting was also attended by Land and Survey, Beluran representatives. In that meeting, it was agreed that Sapi Plantations would support the land application of local communities (amounting to approximately 56.80 ha). As of the date of this audit, the land title has been excluded from land title Rumidi Estate. For current status villagers still waiting for land title issuance by the Land and Survey Department, Sabah. Meanwhile, to honour the agreed terms, Rumidi Estate has excluded the area of 56.80 ha from its total Area Statement.
4.3 The unit of certification contributes to local sustainable development as agreed by local communities.	4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.	YES	Contributions to local communities evident.

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Clause	Indicators	Comply Yes/No	Findings
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	Terusan 1 and Terusan 2 Estates comprise a total area of 6,354.8 ha and both share the same land title issued by the Director of Land and Surveys to Sapi Plantations Sdn Bhd under No Country Lease 085322854 dated 26 March 1990 from the period 1 January 1990 to 31 December 2088. The Country Lease also specifies that the land is only for the purposes of cultivation of oil palm.
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	YES	There was no evidence of any land dispute involving the Terusan Palm Oil Mill, Terusan 1, Terusan 2 and Rumidi Estates. Therefore, this Indicator on payment of compensation using FPIC principles is not applicable.
	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	56.80 ha excised from SLDB 2 to Kg Gana Jati being settlement of a land claim with the local communities. A meeting on 15 September 2009 between Sapi Plantation Sdn Bhd and affected local communities was held. This meeting was also attended by Land and Survey, Beluran representatives. In that meeting, it was agreed that Sapi Plantations would support the land application of local communities. As of the date of this audit, the land title has been excluded from land title Rumidi Estate. For current status villagers still waiting for land title issuance by the Land and Survey Department, Sabah. Meanwhile, to honour the agreed terms, Rumidi Estate has excluded the area of 56.80 ha from its total Area Statement.
	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	YES	

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Clause	Indicators	Comply Yes/No	Findings
	communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.		
	4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).	YES	Auditor has verified on land issue at Rumidi Estate, where Wilmar already settle the issues with participatory from Kg Gana Jati. EHS officers has monitored the area by monthly basis & found that no further encroachment until this audit in 2021.
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	YES	All relevant information was available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.
	4.4.5 (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	YES	Auditor has verified on land issue at Rumidi Estate, where Wilmar already settle the issues with participatory from Kg Gana Jati. EHS officers has monitored the area by monthly basis & found that no further encroachment until this audit in 2021.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	YES	The implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. As explained in indicator 4.4.2, it has been verified that the land is now legitimately owned by Wilmar Terusan CU since 1988. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was made available.
4.5 No new plantings are established on local peoples' land where it can be demonstrated that	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 Terusan CU and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is legitimately owned by Wilmar Terusan CU since 1988. The audit team had confirmed that there were no land issues related to previous owners except for the new claim made by stakeholder as per explained in indicator above.

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Clause	Indicators	Comply Yes/No	Findings
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.			Auditor has verified on land issue at Rumidi Estate, where Wilmar already settle the issues with participatory from Kg Gana Jati. EHS officers has monitored the area by monthly basis & found that no further encroachment until this audit in 2021.
	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	YES	As explained in Indicator 4.4.1, it has been verified that the land is now legitimately owned by Wilmar Terusan CU since 1988. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no new plantings in Terusan CU.
	4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	N/A	There were no new plantings in Terusan CU. Thus, indicator was not applicable
	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,	N/A	There were no new plantings in Terusan CU. Thus, indicator was not applicable

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Clause	Indicators	Comply Yes/No	Findings
	the full range of food and water provisioning options are considered. There is transparency of the land allocation process.		
	4.5.5 Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	N/A	There were no new plantings in Terusan CU. Thus, indicator was not applicable
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	YES	There were no new plantings in Terusan CU. Thus, indicator was not applicable
	4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	YES	There were no new plantings in Terusan CU. Thus, indicator was not applicable
4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with thru a documented	4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	YES	In the event of a dispute, the Terusan CU will manage it through the "Dispute and Grievances Procedure". The Dispute and Grievance Procedure commences with the receipt of complaint from any party, its investigation, proposed solutions and acceptance of the solutions or otherwise. If the proposed solution was rejected, the dispute will be brought for third party arbitration. In accordance with the Dispute and Grievances Procedure, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department at the Wilmar Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.

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Clause	Indicators	Comply Yes/No	Findings
system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	YES	In accordance with the 'Dispute and Grievances Procedure', the procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established. However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers at mill and visited estates.
	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 Terusan CU. The Fresh Fruit Bunches are supplied from Wilmar owned estates which are certified to RSPO and surrounding independent smallholder/Villagers.
	4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	YES	All relevant information's at the Terusan CU are made available in appropriate forms and languages. The following relevant documents were made available in Bahasa Malaysia, which is a language that every party was conversant in, were made available, sighted and verified during the audit: <ul style="list-style-type: none"> • Employment contracts of workers. • Action Plan for the Social Impact Assessment (2020-2021) • All evidence regarding land claim since 2015 are made available to everyone upon request.
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	YES	In accordance with the Dispute and Grievances Procedure, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department at the Wilmar Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	YES	There were no new plantings in Terusan CU. Thus, indicator was not applicable.
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	YES	There were no new plantings in Terusan CU. Thus, indicator was not applicable.

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Clause	Indicators	Comply Yes/No	Findings
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	The right to use the land was demonstrated and not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights. As explained in indicator 4.4.2, it has been verified that the land is now legitimately owned by Wilmar Terusan CU since 1988. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no new issues regarding land with villagers, local community and neighboring estate.
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	YES	The right to use the land was demonstrated and not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights. As explained in indicator 4.4.2, it has been verified that the land is now legitimately owned by Wilmar Terusan CU since 1988. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no new issues regarding land with villagers, local community and neighboring estate.
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant reqs.	YES	The right to use the land was demonstrated and not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights. As explained in indicator 4.4.2, it has been verified that the land is now legitimately owned by Wilmar Terusan CU since 1988. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no new issues regarding land with villagers, local community and neighboring estate.
	4.8.4 For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).	YES	The right to use the land was demonstrated and not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights. As explained in indicator 4.4.2, it has been verified that the land is now legitimately owned by Wilmar Terusan CU since 1988. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no new issues regarding land with villagers, local community and neighboring estate.

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Principle 5: Support smallholder inclusion

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

Clause	Indicators	Comply Yes/No	Findings
5.1 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	YES	It was verified that the current and past prices for FFB is being displayed at the notice board near the Terusan POM weighbridge.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	YES	Terusan POM regularly explains the FFB Pricing to Smallholders. Training/briefing were conducted at Terusan POM during stakeholder meeting in May 2021. The stakeholder information briefing concerned to FFB qualities, FFB grading, calculation payment by MPOB, oil extraction rate (OER). The calculation method of pricing was made known and given to the Smallholders. Field days were organised monthly by Terusan CU to all the small holders from the supplying list.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	YES	The FFB prices in Terusan POM was adopting from the MPOB Pricing. All prices are calculated by the MPOB and the mill take the price and follow what MPOB guided. Interview with individual who are sending FFB to Terusan POM revealed that they are satisfied with the current price and they are of the opinion that Terusan POM Mill quantum is quite fair compare to other outsider Mills.
	5.1.4 (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	YES	There was no contract or bond for FFB outside supplier sending crop to the Terusan POM. The Suppliers are freely to choose the mill choice of theirs.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	YES	There was no contract or bond for FFB outside supplier sending crop to the Terusan POM. The Suppliers are freely to choose the mill choice of theirs.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	YES	There was no contract or bond for FFB outside supplier sending crop to the Terusan POM. The Suppliers are freely to choose the mill choice of theirs.
	5.1.7 Weighing equipment is verified by an	YES	Weighing Equipment in Terusan POM has been calibrated by yearly basis using

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Clause	Indicators	Comply Yes/No	Findings
	independent third party on a regular basis (this can be government).		accredited weighing company Metrology Corporation Malaysia Sdn Bhd in Nov 2020 & May 2021.
	5.1.8 The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	YES	Wilmar supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. Sighted that latest Stakeholder meeting in May 2021 to promote on RSPO certification. However, the Growers and villagers were not in favor in the implementation due to high cost.
	5.1.9 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	YES	A grievance mechanism which respects anonymity and protects complainants is in place at the Terusan CU as per the Grievances Process, Grievances Procedure ", and "Consultation and Grievances Communication Procedure Internal/External" and Land Dispute compensation and calculation procedure. 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	Wilmar supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. Sighted that latest Stakeholder meeting in May 2021 to promote on RSPO certification. However, the Growers and villagers were not in favor in the implementation due to high cost.
	5.2.2 The unit of certification develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	YES	Wilmar supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. Sighted that latest Stakeholder meeting in May 2021 to promote on RSPO certification. However, the Growers and villagers were not in favor in the implementation due to high cost.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	YES	Wilmar supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. Sighted that latest Stakeholder meeting in May 2021 to promote on RSPO certification. However, the Growers and villagers were not in favor in the implementation due to high cost.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders	YES	Wilmar supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the

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Clause	Indicators	Comply Yes/No	Findings
	on pesticide handling.		internal control system (ICS), who holds the certificates, and who holds and sells the certified material. Sighted that latest Stakeholder meeting in May 2021 to promote on RSPO certification. However, the Growers and villagers were not in favor in the implementation due to high cost.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	YES	Currently Wilmar has created a system to trace their stakeholder around their estates. But so far growers and smallholders in Sabah are willing to join the WAGS to get certification but for smallholder around TPOM CU doesn't want to involve because of financial restriction. But Wilmar do have engagements during stakeholder meeting by encourage them for going certification.

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	Terusan CU subscribes to Wilmar's Equal Opportunity Policy (dated Sept 2010 updated on Jan 2018). This policy sets out the CU's position on equal opportunity in all aspects of its employment including recruitment, training and promotion. The Policy was publicly available as sighted on all notice boards at Terusan 1, Terusan 2, Rumidi and the Terusan Palm Oil Mill (POM). The Policy was also displayed at the Terusan Sapi guesthouse. Verification by the auditors showed the policy 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; and to build a global and able workforce that is based on meritocracy.
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.	YES	Apart from the Equal Opportunity Policy which emphasized that all employees shall be treated equally, there is also no evidence that there has been any form of discrimination against any employee, or group of employees, local communities, women, and migrant workers. As confirmed by the workers during interviews and field observation, payment of wages/salaries, provision of housing and access to benefits and amenities is fair. Review of pay checks, contracts of employment, and interviews of staff, local and foreign workers also showed non - discriminatory practices on the part of Terusan CU. Foreign workers were also accorded the same living standards and accommodations as local 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		As stipulated in the SOPs, "Recruitment selection, Hiring and Promotion", for staff and "Recruitment of Workers" for workers, the recruitment selection, hiring and promotion where relevant are based on availability, skills, capabilities, qualities, and medical fitness necessary for the jobs. Review of salary slips and employment contracts of workers found, hiring is based on skills, capabilities, qualities and medical fitness necessary for the jobs

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Clause	Indicators	Comply Yes/No	Findings
	necessary for the jobs available.		available.
	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	Interviews with the Medical Assistant at Terusan Estate Clinic and all women workers during the audit found pregnancy test was conducted at Terusan CU not as discriminatory practices. It is only permissible when it is legally mandated. This was also confirmed from the interview with members of the Terusan Estate 'Women and Children Committee'. Alternative equivalent employment was offered for pregnant women.
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	YES	A Gender Committee called 'Women and Children Committee' has been formed and committee members appointed for the mill and estate. Activities of the Women and Children Committee (WoW) were planned aimed at understanding of the Wilmar's "Women Charter", its relevant Policies including "Children Protection", "Sexual Harassment and others).
	6.1.6 There is evidence of equal pay for the same work scope.	YES	The equal opportunities policy developed by Wilmar states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. The Social Policy was displayed on notice boards in both Bahasa Malaysia and English.
6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).	6.2.1 (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.	YES	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 (e.g., hours of work, rest day etc), Minimum Wages Order 2020, were also given to the workers. Sighted employment contracts, payslips and work permits of the staff and workers found the pay and conditions are in order and met legal or industry minimum standards and are sufficient to provide decent living wages (DLW). The employment contract in Bahasa Malaysia is for foreign workers. The Employment contract of foreign worker clearly stated the working hours, annual leave, medical benefits and sick leave, insurance scheme, retirement, and etc. During interview with the foreign workers as mentioned in 6.5.1, they understood the content of their contract of employment and pay slip statement
	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	YES	Sighted Employment Contract between Sapi Plantation Sdn Bhd and the workers of Terusan POM, Terusan 1, Terusan2 and Rumidi Estate (refer to 6.2.1 above) had detailed 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). The payroll documents (salary slips) had given accurate information on compensation for all work performed. Contracts and conditions of employment are contained in employment contracts signed between Sapi Plantation Sdn Bhd on one hand, and their workers on the other. The employment contracts sampled in this audit were prepared in either Bahasa Indonesia or

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Clause	Indicators	Comply Yes/No	Findings
	all work performed. This includes a form of record for work done by family members.		in Bahasa Malaysia, among others, the contracts defined the regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. Details on monthly salary and deductions for every worker and staff are reflected in their pay slips which are issued to the workers during pay day. Payslip is the evidence of worker's remuneration. For the local workers, there is evidence in the payslip, the payment of statutory contributions such as EPF, SOCSO and Employment Insurance Scheme are being made in accordance with the relevant legal provisions.
	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.	NO	There was evidence of legal non - compliance on deduction of salary and payment of wages in accordance with the Sabah Labour ordinance (Chap 67) section 113 (4), section 108 (1), and 107A (1) at Terusan CU hence, a Major NCR against Indicator 6.2.3 was therefore, raised.
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.	YES	Terusan CU has provided adequate housing, water supplies, medical and welfare amenities for staff and workers. The houses were all in good conditions, and each house has between 2 – 3 bedrooms. The houses are generally well-maintained with not more than 6 persons live in each house. They are also furnished with the necessities such as cupboard, mattresses, pillows and cooking facilities. Workers interviewed confirmed that the houses and amenities provided are adequate, comfortable and requests for repairs were attended to in a timely manner.
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	Workers' access to adequate, sufficient and affordable food at Terusan CU is via grocery shops at the Mill and Estates.
	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	All sampled workers receive at least minimum wages based on Minimum Wages Order 2020. Terusan CU had calculated the prevailing wages and in-kind benefits for their workers. The calculation included housing, electricity, water, transport to work, sports and recreation facilities, education, childcare and healthcare. The auditor had reviewed the calculation and the method used complied with the calculation in line with the RSPO Guidance on Calculation of Prevailing Wages.

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Clause	Indicators	Comply Yes/No	Findings
	<p>PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a “decent living wage” is in place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following:</p> <ul style="list-style-type: none"> • An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers. • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment. • The unit of certification may choose to implement the “living wage” payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation <p>Until such time where the Malaysian version of “decent living wage” has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid.</p>		
	6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	YES	All Terusan CU permanent and full time workers are used for core work such as Harvesting, Manuring, Spraying, Milling Operation, Grading, Engine driver and workshop. There are no temporary workers in Terusan CU.

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Clause	Indicators	Comply Yes/No	Findings
6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	6.3.1 (C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.	YES	Terusan CU subscribes to the 'Human Rights Policy' which includes statements on policy of Freedom of Association and Right to Collective Bargaining, dated January 2018 and updated 1 st May 2019. This Policy is available in dual language, i.e. Bahasa Malaysia and English and it recognizes and respects of employees to join trade union of their choice and to bargain collectively subject to the provisions of relevant national legislations. Employment contracts sighted do not contain any prohibitive clause from joining any trade unions. The policy included statements, among others, that the workers are allowed to join any registered organizations or associations. Foreign workers are not allowed to hold any positions in the organizations or associations. Interviewed local and foreign workers confirmed their awareness on their rights to join trade union of their choice and to bargain collectively subject to the provisions of relevant national legislations.
	6.3.2 Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.	YES	In practice, there was no trade union/workers' union. However, the Company and workers' representatives have formed a Worker Social and Welfare Committee (WSWC) comprising management and worker representatives who have been elected by the workers themselves as a communication channel between management and workers.
	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	Terusan Mill and Estates do not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant workers. However, in practice, there was no workers union at Terusan CU, although the workers are allowed to join any registered organizations or associations they please. The Company and workers' representatives have formed a Joint Consultative Committee (JCC) called the 'Social and Welfare' committee comprising of management and worker representatives who have been elected by the workers themselves as a communication channel between management and workers. Employment contracts sighted do not contain any prohibitive clause from joining any trade unions.
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	Terusan CU subscribes to the Wilmar's Child Labour Policy updated in September 2010. The Policy states that it would not tolerate the use of child or forced labour, nor exploitation of children in any of its global operations and facilities. Wilmar's Child Protection Policy which was last reviewed in January 2018 states that Wilmar does not tolerate child labour, any forms of child exploitation and child abuse.
	6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher.	YES	There is evidence that minimum age requirements are met at Terusan CU. On contrary, there was no evidence that the estates have employed anyone below the age of 18 years. This was verified by examining the workers master lists, personal file, employment contracts and payslips of all workers at Terusan POM and Estates where details of the workers' IC numbers and dates of birth are available.

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Clause	Indicators	Comply Yes/No	Findings
	There is a documented age screening verification procedure.		
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	YES	There was no evidence that the estate has employed anyone below the age of 18 years. This Indicator is not applicable
	6.4.4 The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	YES	" <i>Polisi Buruh Kanak-Kanak</i> " updated September 2019 is publicly available at Mill and Estates. There was no evidence that the estate had employed anyone below the age of 18 years. Communication of Wilmar's 'no child labour' policy was implemented to both workers and external stakeholders (including neighbouring estates, suppliers, local community) through workers training programmes and Stakeholders meetings respectively.
6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.	6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	YES	A Policy against sexual harassment dated June 2014 and updated in January 2018 has been established. The Policy known as Sexual Harassment, Violence and Abuse, Reproductive Rights Policy updated 2014 and signed by the Group Plantation Head and Group CSR Head. It defines and gives examples of sexual harassment, violence and abuse. This includes physical attacks, threatening behavior, and verbal abuses, written threats of emotional/psychological nature. Sexual harassment as defined in the policy also is an action that can be made either implicitly or explicitly, and or made a term or condition of an individual's continued employment, career advancement or promotion.
	6.5.2 (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	YES	A Policy to protect reproductive rights of all, especially women is implemented. This Policy known as Sexual Harassment, Violence and Abuse, Reproductive Rights Policy updated 2014 and signed by the Group Plantation Head and Group CSR Head. The Policy gives the employees the right to decide freely and responsibly of their planning to have children, and to make decisions concerning reproduction free of discrimination, coercion and violence. Additionally, an SOP and Policy for Maternity Leave and Allowances. This Policy gives the rights of maternity leave and allowances subject to the fulfilment of the terms and conditions. This Policy is applicable to all female workers, including foreign female workers.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	YES	During time of Audit, there were new mothers among the female workers at Terusan CU. hence, assessing the needs of new mothers was implemented. The needs of the new mothers were assessed by Medical Assistant of Terusan Clinic through interview and recording their needs.
	6.5.4 A grievance mechanism, which respects anonymity and protects complainants where requested, is	YES	Terusan CU has a grievance mechanism for both complainants and requester to use which respects anonymity and protects complainants where requested. The SOP for grievance mechanism titled 'Dispute and Resolution Procedure' sighted. A 'Complaint and

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Clause	Indicators	Comply Yes/No	Findings
	established, implemented and communicated to all levels of the workforce.		request form' was also provided to facilitate external and internal stakeholders to air their grievance/complaints/request. The procedure enables recording and acknowledgement of the complainants/requester grievance by Terusan CU management, the latter's decision taken and acknowledgement from the grievance party on the resolution of the complaint/request provided. The SOP was also displayed on notice boards at the Mill and Estates for workers awareness.
6.6 No forms of forced or trafficked labour are used.	<p>6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty to the workers for termination of employment • Debt bondage • Withholding of wages 	YES	<p>All workers in Terusan CU have entered into employment voluntarily; as it was verified during the interview with local and Indonesian workers at the Mill and Estates. Foreign workers know they will work in Oil Palm Sector since from their country.</p> <p>Terusan CU had not withheld foreign workers passport as verified during workers interviews.</p> <p>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: they are allowed to resign from Terusan CU after 8 weeks of notice and they also don't have debt of bondage.</p> <p>Foreign workers who used recruiting agents in their own country also confirmed they pay service fee and the others for passport, visa, medical, food, transportation from their village and flight ticket. Interview with workers confirmed they also understood that they need to do all the above to go to Malaysia, and the agent also already explained to them regarding the work they should get in Malaysia which is in oil palm plantation. In Malaysia, there was no contract substitution, debt bondage and withheld wages. Nevertheless, most foreign workers at Terusan CU are through direct recruitment.</p>
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	YES	<p>There is a special labour policy and procedures established known as "Recruitment of Workers". This document spells out the recruitment process from:</p> <ol style="list-style-type: none"> Manpower planning – applying for quota, appointment of recruitment agent, sourcing of workers, workers interviews, satisfaction of employability criteria, shortlisting. Recruitment process – registration onto the approved Employee Master list and uploaded onto the SAP system. Orientation – briefing on language, safety procedures, labour laws, culture practices, surrounding community, housing, medical, amenities, issuance of PPE. Commencement of work – no discrimination, no contract substitution practices, post-arrival orientation programme and provision of decent living conditions. <p>Employment records of both local and foreign workers reviewed at Terusan CU confirmed the procedure on workers recruitment complied strictly to the SOP</p>

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Clause	Indicators	Comply Yes/No	Findings
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
	6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.	YES	<p>Emergency Response Plan (ERP) was established since 2009. A revision on the ERT was made in 2015. Random interview with the estate workers showed that they were aware of accident and emergency procedures. Copies of procedures and telephone numbers were sighted on notice boards and muster grounds via pictorial given during remote audit. Among of procedure of ERP Document, such as:</p> <ul style="list-style-type: none"> ▪ 3.0 Bund break ▪ 4.0 Suicide attempts and prevention ▪ 5.0 Bushfire ▪ 6.0 Fire breakout in mill ▪ 7.0 Chemical spillage ▪ 8.0 Flood ▪ 9.0 Injury and illness ▪ 10.0 Poisoning ▪ 11.0 Workplace violence ▪ 12.0 Boiler shutdown ▪ 13.0 CPO pipe burst & fire ▪ 14.0 Exhaust chamber explosion ▪ 15.0 Pipe leak ▪ 16.0 Earthquake ▪ 17.0 Biogas <p>(Onsite) Accident and emergency procedures for inhale of a highly toxic pesticides was available and updated at all estates and POM. Random interview with the estates and mill workers showed that they were aware of accident and emergency procedures. During site visit, it was sighted Emergency Response Plan was available at Boiler Station, Chemical Store, Workshop and Lubricant Store. During interviews with workers, it was noted that all workers understand regarding ERP. First aid training was conducted at mill and estates annually. The records of the training refer indicator 3.7.2. First Aid boxes</p>

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Clause	Indicators	Comply Yes/No	Findings
			were available at work operations in the field in all estates and mill. Telephone numbers and names of the members of the Emergency Response Team (ERT) were communicated to all employees and displayed at notice boards. Telephone numbers of the PIC, Police Station, Fire Brigade, and <i>Klinik Kesihatan</i> were also included.
	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.	YES	All staff and workers such as the storekeepers, harvesters and sprayers/manurers, POM workers/operators 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. This was verified in the PPE issuance records viewed. Sanitation facilities for those applying pesticides was available near to chemical store area, after completed spraying activities, the workers will change out of PPE, wash and put on their personal clothing at the area. Meanwhile, during site inspection estate and mill workshop, most of the moving part and rotating machinery were installed with machine guarding and properly covered. Noted also the set of oxygen and acetylene cylinders in the workshop available with “flash back arrestors”.
	6.7.4 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.	YES	Medical care and accident insurance is provided to all employees, both Local and Foreign workers under Employees’ Social Security Act 1969 (Act 4). Sighted the last three months’ payment made to SOCSO on Form 8A for foreign and local workers at the POM was available for reviewed. Terusan CU provides medical care to Group Estate workers with Estate Clinic established within the premises. Cases requiring higher attention of medical care are referred to Telupid Hospital. All the workers both local and foreign are covered by SOCSO.
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	YES	Form JKPP 8 for 2020 was submitted to DOSH timely in Jan 2021 via MyKKP System. Accident statistics were being maintained in a satisfactory manner and periodically reviewed. Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKPP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKPP 8 a mandatory requirement with submission as follows. Accident Statistics are being maintained in a satisfactory manner. Mainly the high attribution of accident cases was from harvesting and general maintenance works. Where required submissions of JKPP 6, & 8 to DOSH were complied with under the legislative requirement. Investigations and revision of HIRARC where appropriate were made accordingly.

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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	Terusan CU estates continued to implement IPM as per Agricultural Manual and Standard Operating Procedure for Oil Palm (Chapter 8: Plant Protection-Pest and Disease Management). In order to minimize the use of pesticides, all 3 units had planted beneficial plants mainly Tunera subulata, and some Antigonon leptopus with maps indicating areas planted. The estates continued to carry out monthly detection and observation of leaf eating pests, mammalian pests and diseases like Ganoderma and Stem Rot. These monthly detection and observations were carried by staff and records of observation were sighted. Records showed no outbreak had been taken place. Terusan CU continued to implement Integrated Pest Management (IPM) in the estates and continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the EMU which include monitoring pest population, cultural biological, physical, mechanical control and pesticides usage.
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	YES	Species referenced in the Global Invasive Species Database and CABI.org. are not used in managed areas of Terusan CU.
	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	Terusan CU estates continued to use the Wilmar policy of no open burning. As advocated, the 3 estates practised Zero burning thus no use of fire for pest control
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.	YES	Justification of all pesticides used had been demonstrated. The use of selective products that are specific to the target pest, weed or disease had been demonstrated in: <ul style="list-style-type: none"> i. SOP Manual – page 1-6 Justification in SOPs on the use of Agrochemicals ii. Agriculture Manual – Chapter 6 -upkeep and maintenance of oil palm. iii. Agriculture Manual - Chapter 8: Plant Protection-Pest and Disease Management Terusan 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

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Clause	Indicators	Comply Yes/No	Findings
			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	Terusan CU had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients applied per ha. Pesticides are used only when justified and areas used were recorded in bin cards, program sheets, chemical register, field cost books and in progress reports. All the estates had documented programs for spraying pesticides and for rat baiting. Records of pesticides used were available for verification.
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	YES	As part of the IPM plans, the quantity of pesticides required for various field conditions are documented and justified in Wilmar International Limited Agriculture Manual & Standard Operating Procedure for Oil Palm 3/2011. The implementation in the field were consistent with the SOP and the following practices were adopted by the estates.
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	YES	There was no evidence of prophylactic use of pesticides in Terusan CU except in immature and young fields, where prophylactic spraying using diluted cypermethrin are still practised for the Pest and Diseases management such as control of Rhinoceros Beetle as per SOP.
	7.2.5 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:	YES	Terusan CU only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations 2000. a) From the review of the chemical register, it was noted that all pesticides used are of class III & class IV. The use of paraquat had been banned in all estates since 2008 and was replaced by a systemic herbicide and glufosinate ammonium. b) There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions had been used. c) From records and interviews with workers, staff and estate assistants, found that they were trained, all precautions taken and all legal requirements met. d) Signboards indicated 'AWAS Dilarang Masuk', block, dates of operation, type of operation and chemical were used.
	7.2.5a Judgment of the threat and verify why this is a major threat.	Yes	There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had not been used as mentioned above in 7.2.5 of this check list and based on audit findings. Hence, the need for a judgment of the threat assessment does not apply on the Terusan CU.
	7.2.5b Why there is no other alternative which can be used.	Yes	As mentioned above in 7.2.5 of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had not been used. Hence, the need for other

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Clause	Indicators	Comply Yes/No	Findings
			alternative which can be used does not apply on the Terusan CU.
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	Yes	As mentioned above in 7.2.5 of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had not been used. Hence, the need for other less hazardous alternative which can be used does not apply on the Terusan CU.
	7.2.5d What is the process to limit the negative impacts of the application.	Yes	As mentioned above in 7.2.5 of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had not been used. Hence, the need for the process to limit the negative impacts of the application does not apply on the Terusan CU.
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	Yes	As mentioned above in 7.2.5 of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had not been used. Hence, the need for the estimation of the timescale of the application and steps taken to limit application to the specific outbreak does not apply on the Terusan CU.
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers. Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	Yes	The estates and mill have the SOP for use of PPE during working. All workers involved in pesticide application were provided with appropriate PPE and replaced when damaged. PPE issue and replacements records were verified by the auditors. The estate and mill had a SOP for handling of chemical/pesticides. The employees involved in the chemical handling such as the storekeepers, sprayers, fertilizer and rat bait workers were trained in chemical handling and they understood the hazards of the chemicals and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to them through the SDS training.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	Yes	The storage of pesticides at Terusan CU was concluded in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations. a) The chemical and fertiliser stores (with cemented floors and roofing) are locked & handled only by authorised personnel i.e. storekeeper. The stores in the 3 estates were ventilated (equipped with exhaust fans). All the chemicals were arranged/segregated according to the type. The fertilizers bags were well stacked. b) During site visit to all stores in Terusan 1, Terusan 2 and Rumidi Estate i.e. chemical and fertilizer store, sighted relevant SDS were displayed. Adequate Safety Signage have been placed at both internal and external of the building. c) A proper premixing area with eye wash facilities and bathing area is available at the estates. The waste water from the washing of empty chemical containers and PPE, and chemical mixing was

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Clause	Indicators	Comply Yes/No	Findings
			<p>pumped to a storage tank for reuse in chemical mixing. This is to avoid any contamination of chemicals onto the ground.</p> <p>d) Triple rinsing activities continued to be implemented for empty pesticide containers. The activities were carried out at a concrete pond of 3 levels.</p> <p>e) Empty pesticide containers were punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels were available for guidance.</p>
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	Yes	<p>The Standard Operating Procedures "Labelling, Handling, Storage, Transfer and Disposal of Scheduled Waste" has been established under Environment Management System Procedure.</p> <p>a) The disposal of waste material related to pesticide containers are being carried out as per established procedures. Triple rinsing activities continually implemented for empty pesticide container.</p> <p>b) Scheduled wastes identified included hydraulic oil (SW305), spent lubricant oil (SW306), used chemical containers/drums (SW409), used batteries (SW102), and fertilizer bags (SW410).</p> <p>Records on usage and disposal were well recorded and documented. Scheduled wastes had been disposed off through a licensed contractor approved by DOE. Segregations of waste i.e. general and scheduled wastes was verified to be satisfactory carried out in the Terusan CU. Proper storage areas were identified for the storage of the recycle waste at the estates and mill.</p>
	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	<p>Aerial spraying is not a practice in Terusan CU. There was no evidence to show that such a method being used in Terusan 1, Terusan 2 and Rumudi Estates. This was also supported through interviews with executives, field staffs and workers. No such activities being witnessed during the field visit.</p>
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	Yes	<p>The specific annual medical surveillance for pesticide operators were carried out. From the results, all workers fit to handle chemical.</p>
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women	Yes	<p>The Wilmar Group Child Labour Policy updated in September 2010 is publicly available at the offices of the Terusan Palm Oil Mill, Terusan 1, Terusan 2 and Rumudi Estates. The policy defines Wilmar Group's commitments not to employ children, and the policy defines 'child' in accordance with the ILO Convention definition irrespective of what the local and national law stipulates. A review of the workers'</p>

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Clause	Indicators	Comply Yes/No	Findings
	or other people that have medical restrictions and they are offered alternative equivalent work.		list show that all workers at the POM, Terusan 1, Terusan 2 and Rumidi estates are above 18 years of age. Pregnant and breast-feeding women are not allowed to work with pesticides and hazardous chemicals in Terusan CU. This instruction was tabulated in SSOP Chapter 2:2.4.2 "Penyemburan racun". This was also supported through interviews with executives, field staffs and workers. No such activities being witnessed during the site/field visit. The estates maintained the list of sprayers. Identification of pregnancy status is made by the respective appointed Medical Assistant during the monthly check-up. Field interviews with the lady workers confirmed that such a regulation is a standard practice in the estates and in compliance.
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	A waste management plan was documented and implemented according to <i>Waste and Pollution – Identification, Prevention, Mitigation and Improvement Plan</i> that applicable for all estates and POM. The plan has identified and documented type of waste that generated from all operation in the estates and POM. The plan has also identified source of pollution, possible waste/pollution, effected environment, prevention, mitigation, enhancement and monitoring. Procedures and guideline were used to guide the waste disposal activities and to reduce pollution on the routine operation. In the sampled estate and mill, the waste management plan seen incorporated with environmental impact aspect assessments. The assessment seen effectively covers on matured maintenance, FFB collection, workshop, schedule waste / chemical / fertilizer store and etc.
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	YES	Standard Operating Procedure Scheduled Waste Disposal has been established. The documentation and identification of all waste product such as scheduled wastes, domestic wastes, clinical wastes, recyclable wastes such as metal, tins, plastics, bottles, mill wastes and polluting material e.g., EFB and POME. 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). During site inspections at Terusan CU, sighted old workshop contractors have been demolished. Estates have offered and encouraged them to do machineries/FFB lorry service and maintenance at estate workshop. However, based on interview with all contractors' driver lorry, mention all services and maintenance have been carried out at outsider workshop. Used lubricant/hydraulic oil, used oil filter, used batteries was disposed via outsider workshop management. In addition, sighted there is no evidence that all services and maintenance was carried out at compound workers' quarters.
	7.3.3 The unit of certification does not use open fire for waste disposal.	YES	During site visit at Terusan CU i.e. workers' quarters compound, field operation, landfill, there was no evidence of open fire has been used for waste disposal. All domestic wastes (household and food waste only) at Terusan CU have been disposed via landfill.
7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	YES	Fertiliser application was of paramount importance for maintenance of soil fertility and the estates continued to apply fertilisers as per Eco-Management Unit (EMU) recommendations made by Head of R&D Department. In addition, all 3 Estates, continued to manage soil fertility as per the SOPs in the Agriculture Manual Chapter 4, Part 3 of Chapter 6 and Chapter 10. Soil fertility had been managed by recycling of biomass like frond stacking and EFB application (in some areas), water management in low

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Clause	Indicators	Comply Yes/No	Findings																																																																																														
that ensures optimal and sustained yield.			lying areas, maintenance of soft weeds, LCC and <i>Nephrolepis biserrata</i> in the interline. Annual Fertiliser recommendations are made based on annual foliar sampling. Records showed that the estates continued to carry out periodic foliar and soil sampling to monitor changes in nutrient status.																																																																																														
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	YES	All 3 Estates had a nutrient recycling strategy in place. Palm fronds were stacked in the fields to decompose and by EFB application. There was no POME application in all 3 Estate. POME was used for Methane capture at the POM.																																																																																														
	7.4.3 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	Fertiliser application was of paramount importance for maintenance of soil fertility and the estates continued to apply fertilisers as per EMU recommendations made by Head of R&D Department. Terusan CU had a nutrient recycling strategy in place. Palm fronds were stacked in the interrow to decompose. For EFB application on both estates, priority was given for application in young mature areas and replants. The EFB assists to supplement the inorganic fertilizer thus improving the nutrient status.																																																																																														
	7.4.4 Records of fertiliser inputs are maintained.	Yes	Fertilizer inputs were based on recommendation by the Eco-Management Unit (EMU). The application programs were monitored using program sheets, bin cards, field cost book and manuring program sheets. Records of programs and applications of fertilizers were available. Records of actual applied in 2021 was verified in all 3 estates.																																																																																														
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	Soil maps were made available to the auditors and the soil survey was conducted on Dec 2007 by Param Agricultural Soil Survey (M) Sdn. Bhd., while analysis for soil organic and carbon was carried out in accordance with the International Sustainable Carbon Certification (ISCC) requirement. Based on the soil maps provided the soil series were:																																																																																														
			<table><tr><th colspan="2">Terusan Estate 1</th><th colspan="2">Terusan Estate 2</th><th colspan="2">Rumidi Estate</th></tr><tr><th>Soil Series</th><th>%</th><th>Soil Series</th><th>%</th><th>Soil Series</th><th>%</th></tr><tr><td>Ambun</td><td>6.33</td><td>Ambun</td><td>1.33</td><td>Bulanat</td><td>8.25</td></tr><tr><td>Apas</td><td>0.97</td><td>Apas</td><td>0.34</td><td>Chempaka</td><td>21.40</td></tr><tr><td>Bergosong</td><td>67.67</td><td>Bergosong</td><td>45.67</td><td>Lundang</td><td>0.35</td></tr><tr><td>Guan</td><td>3.06</td><td>Guan</td><td>1.37</td><td>Malawali</td><td>1.77</td></tr><tr><td>Inanam</td><td>6.58</td><td>Inanam</td><td>5.00</td><td>Medang</td><td>2.18</td></tr><tr><td>Kilas</td><td>0.71</td><td>Kilas</td><td>0.33</td><td>Pinianakan</td><td>15.95</td></tr><tr><td>Kumansi</td><td>3.27</td><td>Kumansi</td><td>28.16</td><td>Sabor</td><td>1.93</td></tr><tr><td>Lumisir</td><td>8.75</td><td>Nobusu</td><td>15.89</td><td>Stom</td><td>0.22</td></tr><tr><td>Nobusu</td><td>0.35</td><td>Tanjong Lipat</td><td>1.91</td><td>Sungai Meranti</td><td>1.32</td></tr><tr><td>Paliu</td><td>1.26</td><td></td><td></td><td>Tebok</td><td>1.51</td></tr><tr><td>Tamanong</td><td>0.73</td><td></td><td></td><td>Tok Yong</td><td>45.12</td></tr><tr><td>Tanjong Lipat</td><td>0.31</td><td></td><td></td><td></td><td></td></tr><tr><td>Total</td><td>100.00</td><td></td><td>100.00</td><td></td><td>100.00</td></tr></table>					Terusan Estate 1		Terusan Estate 2		Rumidi Estate		Soil Series	%	Soil Series	%	Soil Series	%	Ambun	6.33	Ambun	1.33	Bulanat	8.25	Apas	0.97	Apas	0.34	Chempaka	21.40	Bergosong	67.67	Bergosong	45.67	Lundang	0.35	Guan	3.06	Guan	1.37	Malawali	1.77	Inanam	6.58	Inanam	5.00	Medang	2.18	Kilas	0.71	Kilas	0.33	Pinianakan	15.95	Kumansi	3.27	Kumansi	28.16	Sabor	1.93	Lumisir	8.75	Nobusu	15.89	Stom	0.22	Nobusu	0.35	Tanjong Lipat	1.91	Sungai Meranti	1.32	Paliu	1.26			Tebok	1.51	Tamanong	0.73			Tok Yong	45.12	Tanjong Lipat	0.31					Total	100.00		100.00		100.00
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			Kumansi	3.27	Kumansi	28.16	Sabor	1.93																																																																																									
			Lumisir	8.75	Nobusu	15.89	Stom	0.22																																																																																									
			Nobusu	0.35	Tanjong Lipat	1.91	Sungai Meranti	1.32																																																																																									
			Paliu	1.26			Tebok	1.51																																																																																									
			Tamanong	0.73			Tok Yong	45.12																																																																																									
			Tanjong Lipat	0.31																																																																																													
Total	100.00		100.00		100.00																																																																																												

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Clause	Indicators	Comply Yes/No	Findings
	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	Terusan CU had a management strategy for planting on slopes to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by: a) Wilmar International Limited 2011 Agriculture Manual & Standard Operating Procedure for Oil Palm in Chapter 3: Land Clearing and preparation, Part 1: Undulating to steep land. It was incorporated with the company policy as a management strategy for plantings on slopes between 9 and 25 degrees. b) It was observed that no replanting of any individual, contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the CU. c) It was also observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines. d) Cover crop were planted in the replants and in some mature areas. The cover crop <i>Mucuna bracteata</i> had been planted along most slopes by the management. Large areas with <i>Nephrolepis biserrata</i> in the inter rows were sighted during the visit.
	7.5.3 There is no new planting of oil palm on steep terrain.	Yes	Terusan CU had a management strategy for planting on slopes to minimize and control erosion and degradation of soils. It was observed that there is no new planting of oil palm on steep terrain.
7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.	7.6.1 (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	Yes	As per all PPB Estates, to demonstrate the long-term suitability of land for palm oil cultivation, Terusan CU 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 Survey (M) Sdn. Bhd. (2007) 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	As per all PPB Estates, to demonstrate the long-term suitability of land for palm oil cultivation, Terusan CU 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 Survey (M) Sdn. Bhd. (2007) and slope classification maps dated were made available.
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	Yes	Terusan CU had a management strategy for palm oil cultivation taking into account the soil surveys and topographic information, in planning of drainage and irrigation systems, roads and other infrastructure. The topographic information was provided and reviewed by the auditors.
7.7 No new planting on peat, regardless of	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing	Yes	No new planting.

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Clause	Indicators	Comply Yes/No	Findings
depth after 15 November 2018 and all peatlands are managed responsibly.	and new development areas.		
	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	The auditor found out that the areas of peat within the managed areas are inventoried, documented and reported to RSPO Secretariat on 05.11.2019 with the replied from RSPO Secretariat on 19/03/2020 that there were no uncertified sites with peat in Wilmar Malaysia.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	Yes	A review of the SOP on peat soil management in Oil Palm found that Terusan CU continued to monitor, documented and minimised the subsidence of peat (Linggi soil series) in Terusan 1 Estate.
	7.7.4 (C) A documented water and ground cover management programme is in place.	Yes	Terusan CU continued to have documented water and ground cover management programme in place in the SOP on peat soil management in Oil Palm in Terusan 1 Estate maintaining water level 50-70 cm below the bank in collection drains or 40-6-cm groundwater piezometer reading.
	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a	Yes	Drainability assessments were conducted in Terusan CU by the Sustainability Department and EMU Department, following the RSPO Drainability Assessment Procedure, (Within 5 years:2019 to 2025) to set the timeframe for future replanting.

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Clause	Indicators	Comply Yes/No	Findings
	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.		
	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.	No	During the field visit, it was found that Block 4 (2015 Replant) in Terusan 1 Estate having a peat (Linggi soil series) did not have a proper documented water and ground cover management programme and no weekly monitoring and recording of the water level in the drain as per SOP for organic soil management -Terusan Estate and 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) plus Emergency Response Plan for fire prevention and control were not available for this area. Therefore, a Major NCR MNAJ 01 of 2021 is raised.
	7.7.7 (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.	Yes	Since Terusan CU had only 10.78 hectares of peatland which is 0.2% of the total area, the auditor found out that no areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas".
7.8	7.8.1 A water management plan	YES	All 3 Estates and POM had in place a water management plan last revision 16/01/2017 to promote more

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Clause	Indicators	Comply Yes/No	Findings
Practices maintain the quality and availability of surface and groundwater.	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>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 all 3 Estates and POM the water management was reviewed by the by Ecological Management Unit (EMU). The plan covered</p> <ul style="list-style-type: none"> • Water resources • Housing Water – Treated Water • Water Quality Management • Emergency Management • Drought Contingency Plan <p>Terusan 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.</p>
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	YES	The continued availability of water sources and to avoid negative impacts on other users in the catchment has been conclude in the Environmental Compliance Report (ECR) for Terusan CU. The ECR was conducted by third party. The ECR assessment was carried one every 4 months. Based on the ECR, 10 water sampling point selected from Upstream to Downstream i.e. Sungai Bungau-Bangau, Sungai Terusan Sapi, Sungai Labuk, Sungai Kibut. Based on the result, water quality monitoring is generally within Class IIB of INWQS at all monitoring points.
	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 in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).	NO	During site visit at Terusan 1 Estate (Field 2017, Block 7 & 8), Terusan 2 Estate (Field 2018, Block 53) sighted chemical maximized spraying application close to the water's edge was carried out along the main drains (artificial drainage) directly channel to Sungai Kibut and Sungai Bangau-Bangau under riparian reserved. The activities also were not in line with the RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017). As a result, Major NCR D4 03 2021 was raised.
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.	YES	Effluent license renewal application for year 2021/2022 and letter from Department of Environmental, signed by Director of DOE. A Methane Capture Plant (Biogas Lagoon) and Effluent Treatment Plant (ETP) are available at Terusan 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 60mt ffb/hr. According to DOE's license, the disposal method of the final discharge is through land irrigation. The ETP was regularly maintained by desludging of the ponds to ensure its efficiency. Final discharge

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Clause	Indicators	Comply Yes/No	Findings																						
			samples were taken on monthly basis and sent to an accredited laboratory for analysis. Among the parameters required by the DOE to be monitored are bio-oxygen demand (BOD), suspended solid (SS), oil and grease (O&G), ammoniacal nitrogen (AN) total nitrogen (TN), pH and temperature. 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 100 mg/l.																						
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	Process water is obtained from water catchment near to the mill. The water usage per tonne of fresh fruit bunches (FFB) continued to be monitored on monthly basis.																						
7.9 Efficiency of fossil fuel use and the use of renewable energy is optimised.	7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented.	YES	<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>For input year 2020, the report sends via email to RSPO on 08/11/2021 through the Palm GHG calculator and publicly reported.</p> <table><tr><td>Description</td><td>tCO₂e/tProduct</td></tr><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></table> <table><tr><td>Production</td><td>t/yr</td></tr><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></table> <table><tr><td>Land Use</td><td>Ha</td></tr><tr><td>Year</td><td>FY 2020</td></tr><tr><td>OP Planted Area</td><td>12736.23</td></tr></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
Description	tCO ₂ e/tProduct																								
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Year	FY 2020																								
OP Planted Area	12736.23																								

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Clause	Indicators	Comply Yes/No	Findings			
			OP Planted on Peat	10.34		
			Conservation (forested)	4033.21		
			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										
			<div>Palm Oil Mill Effluent (POME) Treatment</div> <table><tr><td>Diverted to compost</td><td>0%</td></tr><tr><td>Diverted to anaerobic digestion</td><td>100%</td></tr></table> <div>Diverted to Anaerobic Digestion</div> <table><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%
Diverted to compost	0%												
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Diverted to methane capture (electricity generation)	38%												
	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	(Remote & Onsite) 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 Terusan 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. Terusan 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	There was no evidence that fire had been used to prepare land for replanting in all estates. a) No fire was used for waste disposal in Terusan CU and it continued to use Wilmar International Limited's policy of no open burning dated 15th, Nov 2019. As advocated, the 3 estates practiced Zero burning. b) In the 2018,2019 and 2020 Replants visited during the audit in the 3 estates, it was evident that all palms were felled, shredded, windrowed and left to decompose.										
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	Yes	Terusan CU had established the fire prevention and control measures for the areas under its direct management. Accident and emergency procedures were available in adherence to the Wilmar International Limited's policy on <i>Emergency Response' Plan - chapter 5</i> . Each estate and mill had a standard procedure for emergencies situation. There was formation of ERP Team & ERP for all the identified incidences. The organization chart for the ERP team was established										

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Clause	Indicators	Comply Yes/No	Findings
			and displayed for information to the employees. The important telephone contact numbers were also provided therein.
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	Yes	Terusan CU had also established the fire prevention and control measures with adjacent stakeholders through feedback forms which were distributed on 04/10/2021 to 23 stakeholders as to comply with MCO restriction. The information among others includes a) Compliance to RSPO/MSPO requirement including zero burning engagement. b) Basic understanding of MSPO/RSPO the no open burning.
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.	7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	Yes	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 Terusan CU since Nov 2005.
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	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 Terusan CU since Nov 2005.
	7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.	Yes	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 Terusan CU since Nov 2005.
	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	Yes	

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Clause	Indicators	Comply Yes/No	Findings
	include stakeholder consultation and take into account wider landscape-level considerations.		
	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).	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 Terusan CU since Nov 2005.
	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	Review of the external stakeholders list and communication records confirmed there are no communities and communities land located within Terusan CU, hence, this Indicator is not applicable

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Clause	Indicators	Comply Yes/No	Findings
	7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	YES	The HCVF scoping assessment of the estates had been completed by Sustainability Department (Calley Beamish & Edrin Moss) entitled " <i>High Conservation Value Identification and Management, Terusan Palm Oil Estates 2009</i> " and Report on 15 May 2009. From the assessment, sites with attributes HCV 4 (Sg. Bangau-Bangau) and HCV 6 (Bidu-Bidu Forest Reserve) were identified. For Bidu-Bidu Forest Reserve, there was another survey conducted by HUTAN and Sabah Wildlife Department between 2002 and 2003 to identify species and there were signs of orang utan, sun bears, mouse deer, barking deer and bearded pig within the Forest reserve. The total HCV areas were 285.64 Ha. This has been updated accordingly in Aug 2021, via new mapping technique conducted by the CU. There were no major changes to the HCV Plan, except awareness training, continuous monitoring for HCVs area by plant the camera trap and Removal of invasive vines from areas indicated in the field along the Sungai Bangau – Bangau which had completely covered all the riparian vegetation in some areas. HCV monitoring at the Estates is carried out at least once monthly.
	7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	YES	There are no HCVs, HCS forests and other natural ecosystems, peatland conservation areas and RTE species established after 15 th November 2018 in Terusan CU, hence, monitoring of their status is not implemented.
	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 Terusan 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	Details are available as per the following attachments relating to Time Bound Plan of Wilmar International Plantation as at June 2021. a) TBP WIP - RSPO Certification Status for Malaysia Operations b) TBP WIP - RSPO Certification Status for Indonesia Operations c) TBP WIP - RSPO Certification Status for Ghana /Nigeria Operations
	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	Yes	<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; intial certification to proceed after HGU process KUDMakmur sejahtera, Srimaram Estate, KUD Tuah 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

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				<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 completed) - delay from 2021 due to Covid-19 • Eyop Industries- target to certified 2025to 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)	Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);	Yes	Details of the Time Bound Plan described as per attachment 6 updated as at June 2021
	(d)	Where there are isolated lapses in implementation of a time-bound plan, a minor non- compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised.	Yes	Details of the Time Bound Plan described as per attachment 6 updated as at June 2021
5.5.3 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.12. Any new plantings since 1 st January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development,	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:</p> <p>Evidences & document reference such as HCV report results, land title, Racp status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled</p>

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		compliance with the NPP shall be verified by an RSPO accredited CB;		to compensation, SOP calculating and distributing fair compensation, etc were concluded adequate in the report for all uncertified management units.
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8;	Yes	<p>At Rumidi Estate 56.80 ha excised from SLDB 2 to Kg Gana Jati being settlement of a land claim with the local communities. A meeting on 15 September 2009 between Sapi Plantation Sdn Bhd and affected local communities was held. This meeting was also attended by Land and Survey, Beluran representatives. In that meeting, it was agreed that Sapi Plantations would support the land application of local communities of Kg Gana Jati (amounting to approximately 56.80 ha). As of the date of this audit, the land title has been excluded from land title Rumidi Estate. For current status villagers still waiting for land title issuance by the Land and Survey Department, Sabah. Meanwhile, to honour the agreed terms, Rumidi Estate has excluded the area of 56.80 ha from its total Area Statement.</p> <p>During interview with JPKK Ganah Jati – Mr Rudi was confirmed that all the land issues has been settle and Willmar already show the exclude land title to the villagers during stakeholder meeting.</p>
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2;	Yes	There was no report or issues raised in relation to labour disputes. Evidences & document reference such as HCV report results, land title, Racp status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc. were concluded adequate in the report for all uncertified management units.
	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	Yes	Wilmar International Limited (WIL) complied to all the related legal requirement. Evidences & document reference such as HCV report results, land title, Racp status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc. were concluded adequate in the report for all uncertified management units.

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	(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>	Yes	<p>Wilmar International Limited (WIL) complied to all the requirements. 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)-(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 <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>There was no non-compliance found for all requirements during this audit.</p>
		<ul style="list-style-type: none"> A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement; 		
		<ul style="list-style-type: none"> Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. 		
		<ul style="list-style-type: none"> Desktop study e.g. web check on relevant complaints 		
		<ul style="list-style-type: none"> If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements. 		
	(f)	<p>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</p>		

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		cannot proceed to a successful conclusion unless it is actively addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be available.	
	(g)	Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these Certification Systems.	

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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>		No additional indicators	Yes	<p>It has been verified that the land titles were for planting either oil palm or agricultural crops for economic value. It has been confirmed that Wilmar International Limited – Terusan Certification Unit has the right to use the land which was legitimately owned by their company. Evidence of legal ownership of the land including history of land tenure was verified during this audit. Each estate was provided with legal use of the land through a Country Lease signed by the Director of Lands and Surveys of Sabah following the payment of premium. It was also confirmed that there was no history of customary land tenure, recognised Native Customary Right (NCR) land. There was based on interview with village of Kg Penimbanan, JPKK Kg Ulu Sapi, Toniting, & Bintang Mas, and JPKK Kg Ganah Jati</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
1.1.2 DA 01 2021	Minor	<p>Requirement: 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.</p> <p>Finding: The documented system for ensuring legal compliance was not in place under <i>Occupational Safety and Health (Noise Exposure) Regulation 2019</i></p> <p>Objective evidence: Terusan 1 Estate, Terusan 2 Estate and Rumidi Estate has conducted audiometric test for grass cutter. However, yet to be carried out the audiometry test for tractor driver and road maintenance worker as per recommendation by Noise Risk Assessment Report #RSSB/NOISE/2021-014 and #RSSB/NOISE/2021-015.</p>	<p>Root cause:</p> <ul style="list-style-type: none"> NRA report was late received by CU from assessor and has been kept in the EMU office. The Noise Risk Assessment (NRA) report recommendations were not communicated to the EHS site personnel. <p>Corrective Action: To conduct audiometric test to all tractor drivers and road maintenance operators. Expected date of completion: 01.12.2021.</p>	<p>Corrective action plan accepted. The effectiveness of implementation will be verified during next audit</p> <p>Status: open</p>
3.6.1 DA 02 2021	Major	<p>Requirement: 3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>Finding: 1)Water Management in Peat Soil and Acid Sulfate Soil operations was not risk assessed yet to identify H&S issues. 2)Mitigation plans HIRARC at Terusan POM regarding Shovel and Tractor (Landini) activities was not implemented and monitored.</p> <p>Objective evidence: 1) Water management operations at estates i.e. water gate activities, stop off/stop bund activities, water level marker monitoring, etc. was not risk assessed yet to identify H&S issues. 2) During site verification at Terusan POM, sighted 2</p>	<p>Root cause:</p> <ol style="list-style-type: none"> The works involving water management in peat soil and potential acid sulphate were considered as low risk that risk assessment was not considered. The security guards manning the gate did not do as what they supposed to do, they just let the farm tractors passed through even though they did not wear reflective vests and safety hats. <p>Corrective Action:</p> <ol style="list-style-type: none"> The HIRARC for water management in peat soil and potential acid sulphate soil had been developed. Attached is the HIRARC. 	<p>1)Sighted risk assessment related to water management in peat soil and potential acid sulphate "Pengurusan air di tanah gambut dan asid sulfat" has been prepared by ESH committee on date 15/12/2021.among of risk has been identified such as:</p> <ul style="list-style-type: none"> Collection main drain Heavy Sand bags Venomous insect & snake Watergate Water current Crocodile <p>2)management of POM immediately issue a memo letter to all FFB suppliers i.e to Anddamy Plantation</p>

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		Tractor Drivers from (FFB Supplier) Andamy Properties Sdn. Bhd., Tractor No. i.e. SAB6046L and SS3962T were not wearing appropriate personal protective equipment (PPE) i.e. safety helmet and reflector safety vest when entering the Terusan POM upon sending the FFB and collecting the EFB as per recommended by HIRARC	2. The management of Andamy Plantations SB had been informed on the PPE requirement. Attached is the notification letter and acknowledgement. Trainings had also been conducted to outside farm tractors from Andamy Plantations and mill internal drivers and security guards on 9/12 and 3/12/2021. Report is attached.	Sdn Bhd on date 10/11/2021 for ensure all the drivers tractor / lorry will comply all the safety precautions in the POM. Also sighted training has been conducted to internal & external drivers on 03& 09/12/2021. Memo related to PPE also has been published and post at the main entrance gate. The safety issues also will be bring in the next stakeholder meeting with FFB suppliers. Status: closed
6.2.3 RAR 01 2021	Major	<p>Requirement: 6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>Finding: there was an evidence on legal non - compliance on deduction of salary and payment of wages -Sabah Labour ordinance (Chap 67) section 113 (4), section 108 (1), and 107A (1)</p> <p>Objective evidence:</p> <p>1.At Rumidi Estate - Samples salary slips for month of August 2021 for workers Ahmad Halil Edy, Jumardi Muhammad Tahir, and Samsudin Zainal showed deduction for electricity usage RM 69.95, RM 92.16, and RM 38.71 respectively was made without JTK permission.</p> <p>2.At Terusan 1 & 2 Estates - during interview with contractor workers (Sudirman Enterprise, Mohd Zulman Enterprise, and Pengangkutan Sinar Maju) was informed they received the salary later than 7 days and exceeding one month of wage period.</p>	<p>Root cause:</p> <p>1. The requirement of JTK permit for the type of deduction involving electricity was not communicated to the clerk in-charge except those usual deductions involving foreign passport and others.</p> <p>2.Estate management consider it is the responsibilities of the contractors to pay their workers not more than 7th of every month.</p> <p>Corrective Action:</p> <p>1. The application for additional permit on deduction of excess electricity usage had been forwarded to JTK Kota Kinabalu and currently awaiting approval.</p> <p>2.Terusan Estate had decided to stop the deduction starting January 2022 and will reimbursed the workers for the month of November and December 2021 in February 2022 for January 2022 salaries.</p> <p>3. Additional job contract agreement between the contractor and their workers had been drawn up and enforced starting 2022. The salary payment to their workers is as agreed in the wage period of the job</p>	<p>1.Sighted application made to JTK Sandakan Sabah on 09/12/2021 for application to add on "permit pemotongan gaji pekerja" related to electricity usage. Sighted approval letter from JTK, Siri no: JTKSBH/PMT/113/2021/0402, date issuance : 27/12/2021 and valid until 26/12/2023.</p> <p>2.Sighted the email form Terusan Group Manager Mr. Marcellus Robert (after having consent from GM) where he agreed to implement of no deduction shall be made until the permits is obtained from JTK. He also agreed to make the reimbursement for any deduction made to Rumidi workers regarding electric consumption (from SESB) for the month of November and December 2021, the reimbursement will be made by February as the month end account was close for now. Also sighted an email from GM to all CU to monitored salary of contractors workers to compliance on wages period, minimum wages,</p>

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			contract agreement. The additional job contracts are attached for the three contractors namely Sudirman Enterprise, Mohd Zulman Enterprise and Syarikat Sinar Maju.	insurance cover, etc , 3.briefing and training has been conducted to all contractor on date 27/11/2021 related to compliance on all relevant laws especially on Sabah Labour laws. Management also has established a guidance to all contractor to included in the jobs contract for their workers and to included payment will be made before 7 th of the next months. Status: closed
7.8.2 DA 03 2021	Major	<p>Requirement: 7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).</p> <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) -2.1.5 Artificial Drainage Channels.</p> <p>Objective evidence: During site visit at Terusan 1 Estate (Field 2017, Block 7 & 8), Terusan 2 Estate (Field 2018, Block 53) sighted chemical spraying application close to the water's edge and was carried out along the main drains (artificial drainage) and directly channel to Sungai Kibut and Sungai Bangau-Bangau.</p>	<p>Root cause: The SSOP/procedure currently mentioned no spraying on water's edge of natural water course and there was no directive that the prohibition applies to include natural water courses.</p> <p>Corrective Action: 1) A memo was issued out by General Manager (Plantations) instructing all field staff and executives on the prohibition of applying chemical spraying on the immediate application of EFB after sent into the fields and to maintain at least 5 meters distance from the water edges and the prohibition of spraying chemicals at the same areas. 2) Trainings was conducted on 21/12//2021 for the spraying applicators and 17/12/2021 for the field staff and executives as per the instruction from General Manager (Plantations).</p>	<p>Sighted a MEMO from General Manager issue to all operation units Sabah and Sarawak on date 09/11/2021 related to compliance and prohibited on application of EFB application at water edge and application of chemical at area such as buffer zones, HCV, drainages, etc.training related to compliance on this issues also has been carried out on 21/12/2021, 15/12/2021 and 17/12/2021</p> <p>Status : closed</p>
7.7.6 MNAJ 01 2021	Major	<p>Requirement: 7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs)</p>	<p>Root cause: 1. The current SOP on "Pengurusan Air di Tanah Asid Sulfat" only covers the water management part.</p>	<p>Sighted weekly monitoring water level has been conducted on 27/12/2021 for block 03,04 for water gate (1-10), all the date has been</p>

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		<p>for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.</p> <p>Finding : All existing plantings on peat are not managed according to the 'RSPO Manual on Best Management Practices (BMPs) .</p> <p>Objective evidence : 1.It was found that Block 4 (2015 Replant) in Terusan 1 Estate having a peat (Linggi soil series) did not have a documented water and ground cover management programme in place.</p> <p>2.It was also found that no weekly monitoring and recording of the water level in the drain as per SOP for organic soil management -Terusan Estate and 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018)</p> <p>3. Emergency Response Plan for fire prevention and control were not available for this peat area.</p>	<p>2. The instruction of taking weekly monitoring was not communicated to the field staff and assistant manager-in-charge.</p> <p>3. Emergency Response Plan (ERP) for fire prevention and control were not available as there has been no incident of peat fire during drought season in the past.</p> <p>Corrective Action:</p> <p>The weekly water level monitoring has started at Terusan 1 Estate. The records and photos of the monitoring are attached.</p> <p>A SOP for Organic Soil Management had been developed on 19/11/2021 by Eco-Management Unit where the requirement on water and ground cover management programme and the Emergency Response Plan (ERP) for fire prevention and control are included.</p>	<p>recorded in form "Watergate- water level monitoring"</p> <p>Sighted SOP for "organic soil management" date 19/11/2021, prepared by Dr Palanivell P. (R&D Senior officer 1) and approved by Head of R&D on date 23/11/2021.</p> <p>Training related to SOP & monitoring has been conducted on 30/12/2021 t all staff & Assistant manager.</p> <p>Status: closed</p>
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ATTACHMENT 5

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED on MYNI 2014

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Verification by Assessor
Indicator 4.1.2 STK 01 2019	Minor	<p>Finding:</p> <p>Table 8.10 of Chapter 8 (Pest of Oil Palm) of Wilmar International Limited Agriculture & Standard Operating Procedure for Oil Palm 3/2011 on Cultural Control Method was not complied with.</p> <p>Objective evidence:</p> <p>Terusan Estate 1 & Terusan Estate 2 – Though extensive replanting had been carried out the planting of Beneficial Plants was not in tandem, that is not sufficient Beneficial Plants had been planted in these areas</p>	<p>Terusan CU continued to implement Integrated Pest Management (IPM) in the estates and continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the EMU which include monitoring pest population, cultural biological, physical, mechanical control and pesticides usage.</p> <p>a) In order to minimize use of pesticides, the estates had planted beneficial plants mainly <i>Tunera subulata</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> with maps indicating areas planted.</p> <p>b) Both the estates also practised Pheromone traps in immature areas as a prevention for Rhinoceros Beetles infestation.</p> <p>c) Census is performed on rat damage and diseases such as Ganoderma. The IPM technique to control rats includes rearing barn owls (<i>Tyto alba</i>) (however yet to produce successful results) and rat baiting was by spot baiting. Rat baiting would continue until bait acceptance fell below 20%. The procedure referred was in the Agricultural Manual and Standard Operating Procedure for Oil Palm (Chapter 8: Plant Protection-Pest and Disease Management)</p> <p>d) During the audit, the auditors observed that the beneficial plant were planted along the roadsides to attract predators and parasitoids. Records showed that beneficial plants were continuously planted in both estates.</p>
Indicator 4.2.1. STK 02 2019	Minor	<p>Finding:</p> <p>Item 2.2.2 & 2.2.3 on placement of Fertilizers of Wilmar International Limited Agriculture & Standard Operating Procedure for Oil Palm 3/2011 was not complied with.</p> <p>Objective evidence:</p> <p>Terusan Estate 1 – It was observed that NPK Fertilizer was only broadcasted over half the palm circle in Block 22 instead</p>	<p>Fertiliser application was of paramount importance for maintenance of soil fertility and the estates continued to apply fertilisers as per EMU recommendations made by Head of R&D Department. In addition, all 3 Estates, continued to manage soil fertility as per the SOPs in the Agriculture Manual Chapter 4, Part 3 of Chapter 6 and Chapter 10. Soil fertility had been managed by recycling of bio-mass like frond stacking and EFB application (in some areas), water management in low lying areas, maintenance of soft weeds, LCC and <i>Nephrolepis biserrata</i> in the interline. Annual Fertiliser recommendations are made based on annual foliar sampling. The Fertiliser and fertilizer rate per palm in mature oil palm recommended for 2020 was as follows:</p>

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		of the over the whole palm circle.	Recommended fertilizers for Mature Area were NPK, NK 1 Mixture, Kieserite, KieserBor & NK2 Mixture and rate per palm was 8.75 to 10.50 Kg/palm/year. Sighted during application of fertilizer was broadcast according to SOP
Indicator 4.3.6 STK 03 2019	Minor	<p>Finding:</p> <p>Management of the “Bergosong” soil, which has potential acid sulphate condition was not well carried out.</p> <p>Objective evidence:</p> <p>Terusan Estate 1 & Terusan Estate 2 – Records of water level monitoring for the “Bergosong” soil areas were not available at time of visit.</p>	Previous using internal laboratory report was not identified as per peat soil. However, management of CU was conducted external soil analysis by Param Soil survey and has identified it as an acid sulphate soil. NCR has been given related to this management of water table.
Indicator 4.4.1 DA 01 2019	Minor	<p>Finding:</p> <p>The water management plan for Rumidi Estate was not effectively implemented and monitored.</p> <p>Objective evidence:</p> <p>Sighted there is no evidence of monitoring the water quality treated water at Rumidi Estate since May 2017.</p>	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 Terusan CU. The ECR was conducted by Ekohandal Sdn. Bhd. The ECR assessment was carried one every 4 months. Verified the ECR Report 1st to 3rd quarter of 2020 and 1st to 3rd quarter of 2021. Based on the ECR, 10 water sampling point selected from Upstream to Downstream i.e. Sungai Bungau-Bangau, Sungai Terusan Sapi, Sungai Labuk, Sungai Kibut. Based on the result, water quality monitoring is generally within Class IIB of INWQS at all monitoring points.
Indicator 5.1.3 DA 02 2019	Minor	<p>Finding:</p> <p>Significant environmental aspects and impacts mitigation methods on activity of diesel and petrol transportation, receiving, storage and dispensing was not effectively implemented and monitored.</p> <p>Objective evidence:</p> <p>During site visit at Terusan 1 Estate genset room, sighted diesel spillage on the ground near to the diesel storage</p>	During site visit at all workshop and parking bay areas was confirmed all tractor and lorries has been provided with tray and have an oil trap to collect all the residue from tractor and lorries,
Indicator 6.5.3 RZ 01 2019	Major	<p>Finding:</p> <ol style="list-style-type: none"> 1. Visiting Medical Officer (VMO) visits to the Terusan Estate Clinic does not comply with the requirements of Section 19(3) of the Workers' Minimum Standards of Housing and Amenities Act 1990. 2. Terusan 1 Estate, Terusan 2 Estates, and Rumidi Estate do not comply with the requirements of Section 10(3) of the Workers' Minimum Standards of Housing 	In this Audit, however, verification of record showed a letter from Klinik Dr Kelvin dated 25 th May 2021 informing Terusan CU of the limitation of his visit due to the MCO and will resume once the MCO is lifted. Nevertheless, Terusan CU has terminated the service of Klinik Dr Kelvin based on the letter dated 21 st October 2021 and in the process of appointing a new VMO for future fortnight visit in compliance with the Section 19(3) of the Workers' Minimum Standards of Housing and Amenities Act 1990.

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		<p>and Amenities Act 1990.</p> <p>Objective evidence:</p> <ol style="list-style-type: none"> 1. Dates of VMO visits to the Terusan Estate clinic were as follows: 2 Jan 2019, 16 Feb 2019, 16 March 2019, 4 May 2019, 25 May 2019, 29 June 2019. This is not in compliance with Section 19(3) of the Workers' Minimum Standards of Housing and Amenities Act 1990 which requires for a registered medical practitioner to visit the clinic at least once a fortnight to supervise the operations and management of the clinic and to provide medical treatment to workers and their dependants. 2. Creches at Terusan 1, Terusan 2 and Rumidi Estates are not provided with milk. The creche at Terusan 2 and Rumidi Estates are not provided playthings. This is not in compliance with Section 10(3) of the Workers' Minimum Standards of Housing and Amenities Act 1990 which requires that on each day a dependant is accommodated at 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 and play equipment 	<p>Auditor's visit to the Creches at Terusan 1, Terusan 2 and Rumidi Estates found milk (Dugro and Dutch Lady brands) was provided by the CU. Playthings, however, were not allowed at the Creches due to MCO restrictions.</p> <p>Hence, the Minor NCR (RZ 03 2019) is therefore closed</p>
<p>Indicator 4.5.4 (RSPO Certification System 2017)</p> <p>RAR 01 2019</p>	Minor	<p>Finding:</p> <p>(e)The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 4.5.4 (a) – (d) above by the audit team based on self- declarations only by the company, with no other supporting documentation, shall not be acceptable.</p> <p>Objective evidence:</p> <p>Evidences & document reference such as HCV report results, land title, Racp status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc was not available for all uncertified management units.</p>	<p>Evidences & document reference such as HCV report results, land title, Racp status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc was available for all uncertified management units such as Malaysia unit, Indonesia unit & Ghana Unit.</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

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8	PT Kerry Sawit Indonesia 2	PT Kerry Sawit Indonesia 2 mill	Kerry Sawit Indonesia 1, Kerry Sawit Indonesia 2, Kerry Sawit Indonesia 3.	Central Kalimantan	2015	Certified
9	PT Rimba Harapan Sakti	PT Rimba Harapan Sakti mill	PT. Rimba Harapan Sakti 1, PT. Rimba Harapan Sakti 2,	Central Kalimantan	2015	Certified
			KUD Makmur Sejahtera	Central Kalimantan	2023	Land title issue
10	PT Karunia Kencana Permaisejati	PT Karunia Kencana Permaisejati mill	PT. Karunia Kencana Permaisejati 1, PT. Karunia Kencana Permaisejati 2, PT. Karunia Kencana Permaisejati 3	Central Kalimantan	2017	Certified
11	PT Agro Nusa Investama (Sambas)	PT Agro Nusa Investama (Sambas) mill	ANI Sambas	West Kalimantan	2019	Certified
			KUD Cempaka Biru dan Sentama Lestari	West Kalimantan	2019	Certified
			Srimaram estate	West Kalimantan	2023	Land title issue
12	PT Bumipratama Khatulistiwa	PT Bumipratama Khatulistiwa mill	Bumi Pratama Khatulistiwa	West Kalimantan	2016	Certified
			Buluh Cawang Plantation	West Kalimantan	2023	HGU is in process
			KUD Tuah 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 Tapian Kandis, Koperasi AWM, Koperasi BST, Koperasi MSJ	West Sumatra	2011	Certified; KUD was certified in 2015
5	PT Buluh Cawang Plantations	PT Buluh Cawang Plantations Mill	Bumi Arjo, Dabuk Rejo, Sukamulya, Bambu Kuning	South Sumatra	2012	Certified
6	PT Gersindo Minang Plantations	PT Gersindo Minang Plantations Mill	Gersindo Minang Plantation, Permata Hijau Plantation-1, Permata Hijau Plantation-2	West Sumatra	2012	Certified
			PHP (blok 22)	West Sumatera	2023	Land title issue
7	PT Daya Labuhan Indah	PT Daya Labuhan Indah Mill	Wonosari, Sei Deras, Cabang Dua	North Sumatra	2013	Certified
8	PT Murini Sam Sam	PT Murini Sam Sam Mill	Murini Sam Sam	Riau	2015	Certified
			PT Murini Sam Sam (466 ha)	Riau	2023	Pre assessment audit, HGU issue

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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