



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

File Ref. : EP09760004

**RSPO PUBLIC SUMMARY REPORT**

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

**PARENT COMPANY** : Wilmar International Limited

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

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

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

**MAP** : See Attachment 1

**AUDIT DATE** : 28 Feb – 4 Mac 2022

**DURATION** : auditor days

**TYPE OF AUDIT** :  Annual Surveillance Audit No. 1  Recertification Audit

**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** : 13 MAY 2021 – 12 MAY 2026

**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 : **MOHD AB RAOUF BIN ASIS**

Name : **Foo Siew Theng**

Signature :

Signature :

Date : **3/6/2022**

Date : **16 Jun 2022**

## RSPO PUBLIC SUMMARY REPORT

### SUMMARY OF AUDITS

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

Annual Surveillance Audit 1			
On-site audit date :	28 Feb – 4 Mac 2022	No. of auditor days :	22 auditor days
Audit team :	Mohd Ab Raouf bin Asis (LA), Rozaimée bin Ab Rahman, Dzulfiqar bin Azmi, Rohazimi bin Mat Nawi, Mohd Zulfakar bin Kamaruzaman.		
No. of major NCR :	1	Indicator: 3.4.3	Closing date: 30/5/2022
No. of minor NCR :	Nil	Indicator : Nil	
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)
	N/A	✓	
Supply base sampled :	Hibumas 1 Estate, Hibumas 2 Estate, Sekar Imej Estate, Sapi Sugut Estate, Sri Kamusan Estate, Jebawang Estate		
Changes since the last audit :	No changes		
Justification of audit planning :	Total allocation of auditor days for Sri Kamusan CU were: Mill = 4.0 days (3 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems) All Estates = 18.0 days for verification of safety and health, environment, good agriculture best practices, Social, HCV, metrics template and GHG verification. This audit has been categorized as high risk due to this CU has been suspended previously.		
Name of peer reviewer :	NA		
Report approved by :	Kamini Sooriamorthy	Approval date :	3/6/2022

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**SUMMARY OF INFORMATION**

**TABLE 1**

	RA	ASA 1	ASA 2	ASA 3	ASA 4
<b>Projection Period</b>	May 2021 – Apr 2022	February 2022 – January 2023			
<b>Certified FFB Processed (MT)</b>	152,362.00	166,538.59			
<b>Production of Certified CPO (MT)</b>	33,053.34	35,555.25			
<b>Production of Certified PK (MT)</b>	6,856.29	7,304.71			
<b>Certified Areas (Ha)</b>	14,258.10	14,258.10			
<b>Planted Area (Ha) (Mature + Immature)</b>	*7,523.03	*7,494.43			
<b>Production Area (Ha) (Planted – Immature)</b>	*7,523.03	*7,494.43			
<b>HCV Areas</b>	5,135.86	5,141.11			
<b>REMARKS</b>	<p><b>*ASA 1 2022:</b></p> <p><b>1. Sekar Imej – reduced 7.66 planted Ha compared to last year due to include in RaCP remediation area (proposed compensation area in Sekar Imej Estate).</b></p> <p><b>2. Hibumas 2 – reduced 16.34 planted Ha compared to last year due to 5.63 include in RaCP remediation area (proposed compensation area in Hibumas 2 Estate). 10.71 ha clearing as nursery.</b></p> <p><b>3. Sri Kamusan Estate – reduced 4.60 ha clearing as nursery.</b></p>				

**TABLE 2**

	CPO	PK
<b>Last years certified volume (MT)</b>	33,053.34	6,856.29
<b>Last years actual certified sold (MT)</b>	8,457.000	1,968.99
<b>Last years actual sold under other schemes (MT)</b>	-	-
<b>Last years sold conventional (MT)</b>	-	-
<b>Last year actual sold CSPO credits (where applicable)</b>	-	-
<b>New year certified volume (MT)</b>	35,555.25	7,304.71

- Some FFB from Sekar Imej, Sapi Sugut, Hibumas 2 has been diverted to Terusan 2 Mill resulted actual certified sold much lower (75%) compared to the last year certified volume for both CPO and PK.
- During the period of suspension from between 7 May 2021 and 19 July 2021, company sold their CPO and PK under non-certified.

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**1.0 AUDIT PROCESS**

**1.1 Certification Body**

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

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

**Qualification of audit team**

**1.2**

<b>Member of the Audit Team</b>	<b>Role/area of RSPO requirements</b>	<b>Qualifications</b>
Mohd Ab Raouf bin Asis	Lead Auditor - Social (Employees), Metrics Template	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.
Rozaimiee Ab. Rahman	Auditor, GAP, Safety (Estate), TBP	Holds a B. Sc. of Agriculture from UPM. He had 7 years of working experience in the oil palm operation. He is a qualified Lead Auditor for RSPO P&C and MSPO.
Dzulfiqar bin Azmi	Auditor, Social (Employees)	Holds a B. Sc. in Agriculture from University Teknologi Malaysia (UiTM). He had more than 5 years of working experience in the oil palm operation. He has experience in auditing since 2018. He is RSPO Lead Auditor since Oct. 2020.
Rohazimi Mat Nawati	Auditor, Safety (Mill), Environment, Supply Chain	Holds a B.Sc. (Hons) of University Teknologi Malaysia. He had more than 7 years of working experience in palm oil mill management covering oil palm. He is a qualified MSPO Lead Auditor and currently Trainee Lead Auditor.
Mohd Zulfakar bin Kamaruzaman	Auditor, Social & 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 and RSPO Supply Chain Lead Auditor.

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### 1.3 Audit methodology

The audit covered the Sri Kamusan palm oil mill, Hibumas 1 Estate, Hibumas 2 Estate, Sekar Imej Estate, Sapi Sugut Estate, Sri Kamusan Estate 6 of the supply bases. The sampling methodology applies for supply base with higher than four estates. The sampling shall be conducted in conformance with the requirement specified in the RSPO Certification Systems Document, Nov 2020. The audit included an on-site audit to the estates, mill and settlers' houses (can be expanded) to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

### 1.4 Stakeholder Consultation

SIRIM QAS International had initiated the stakeholder consultation by announcing the invitation in the RSPO and SIRIM QAS International's websites but only applicable for recertification audit. 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 (local / foreign / Orang Asli workers / male & female)	<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"> <li>a) All workers signed the employment agreements with the estates/mill. They understood the contents of agreement, as these were prepared in English/Bahasa as the case may be. For those who couldn't read, the contents were explained to them in language they understood, usually by fellow countrymen who has worked in Malaysia longer.</li> <li>b) They are aware of their working hours (8 hours) and confirmed they were paid overtime for any work in excess of 8 hours. There was no forced overtime.</li> <li>c) They have been getting salaries above RM1,100. Double paid for working on rest day applied. Salaries were paid before the 7th of every month.</li> <li>d) No abuse at work, and no sexual harassment. They understand what constitutes sexual harassment.</li> <li>e) No discrimination between migrant workers and local workers, between male and female workers.</li> <li>f) Comfortable housing with water and electricity provided.</li> <li>g) Have access to affordable food from the canteen/sundry shops within the estate/mill premises.</li> <li>h) Entitled to free medical facilities at the estate clinic.</li> <li>i) Have representatives' worker who attend regular meetings with the management where they can put forward any complaints and or raise any issues. They are aware of the complaints form. They have used them to complaint about house defects.</li> <li>j) They knew the types of work offered at Sri</li> </ul>

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	<p>Kamusan CU (mill &amp; estates) when they were in their countries of origin.</p> <p>k) All workers keep their own passports at office locker.</p> <p>l) Valid passport and work permits</p> <p>m) They receive their wages in cash. Since it is difficult to go to the nearest town due to the distance, their salaries are being brought in by the gang leaders.</p> <p>n) Undocumented foreign workers are present at Sri Kamusan CU, and are being legalised in stages with collaboration with the Indonesian consulate</p> <p>o) However, certain social issues faced by the workers not taken into account in the SIA action plan. In particular, the following issues were not participatory assessed. NCR raised under indicator 3.4.3.</p>
2) Settlers	Not applicable
3) Villagers / Local communities (including women representatives, displaced communities)	The policy to respect human rights and prohibiting retaliation against HRD has not been communicated. Other than that, the relationship was good especially those between Sri Kamusan Estate and the neighbouring villages. One village even uses fresh water supply taken from Sri Kamusan Estate. Sri Kamusan Estate also engages the nearby local community to work part time as EFB applicator. They find this helpful as it increases their income.
4) Suppliers	All written agreement (FFB Suppliers) known as “Akur Janji dan Persetujuan Bersama” was sampled and contained a clause on no child [para i], forced and trafficked labour [para ii].
5) Contract workers (local / foreign / Orang Asli workers / male & female)	Not applicable
6) Local & national NGOs	No issues for ASA 1 audit.
7) Government agencies / Statutory bodies	No issues for ASA 1 audit.
8) Independent growers / Smallholders	Based on the summary of FFB stakeholder in Sri Kamusan POM, there got several categories of FFB suppliers. Details in indicator 2.3.1 and 2.3.2.
9) Indigenous people	There were no issues on customary or user rights at Sapi Sugut, Sekar Imej and Jebawang Estate during this audit and verified by auditor during interview with Head of Village Representative.
10) Contractor	Interviews were conducted with the transport suppliers as follows for the Sri Kamusan Palm Oil Mill.
11) Previous land owner (if any)	The implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. As explained in indicator 4.4.2, it has been verified that the land is now legitimately owned by Wilmar Sri Kamusan CU since 1988. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no

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		new issues regarding land with villagers, local community and neighbouring estate.
	12) Others (please specify)	Not applicable



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1.5 Audit plan : Refer to Attachment 2

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

### 2.0 SCOPE OF CERTIFICATION AUDIT

#### 2.1 Description of the certification unit

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

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

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

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

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

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

**Table 1: Actual FFB production by the supply base for the period from May 2021 – January 2022**

Estates	FFB Production		Certifying CB
	Tonnes	Percentage (%)	
Sri Kamusan Estate	15,408.91	5.9%	SIRIM
Hibumas 1 Estate	15,199.61	5.8%	SIRIM
Hibumas 2 Estate	8,876.77	3.4%	SIRIM
Jebawang Estate	1,658.02	0.6%	SIRIM
Sekar Imej Estate	261.57	0.1%	SIRIM
Sapi Sugut Estate	213.20	0.1%	SIRIM
<b>Total (certified)</b>	<b>41,618.08</b>	<b>15.9%</b>	
<b>Outsiders (non-certified)</b>	<b>219,818.16</b>	<b>84.1%</b>	-
<b>Total</b>	<b>261,436.24</b>	<b>100</b>	

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**Table 2: Projected FFB production by the supply base for the next reporting period February 2022 – January 2023**

Estates	FFB Contribution	
	Tonnes	Percentage (%)
Sri Kamusan Estate	32,033.33	12.3%
Hibumas 1 Estate	37,466.00	14.3%
Hibumas 2 Estate	59,176.08	22.6%
Jebawang Estate	8,407.92	3.2%
Sekar Imej Estate	25,820.00	9.9%
Sapi Sugut Estate	3,635.26	1.4%
<b>Total (certified)</b>	<b>166,538.59</b>	<b>63.7%</b>
<b>Outsiders (non-certified)</b>	<b>192,328.08</b>	<b>53.6%</b>
<b>Grand Total</b>	<b>358,866.67</b>	<b>100%</b>

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**Table 3: Actual FFB received and CPO & PK dispatch by Sri Kamusan POM for period from May 2021 – January 2022**

RSPO Supply Chain Model: Mass Balance	Total (MT)
FFB Received	261,436.24
FFB Processed	260,885.07
Certified FFB Processed	41,530.34
Non-certified FFB Processed	219,354.73
Crude Palm Oil (CPO)	
Overall CPO Production	52,658.06
Certified CPO Production	8,583.56
Certified CPO delivered as RSPO	8,457.00
Certified CPO delivered as non-RSPO	-
Certified CPO delivered under other sustainable schemes	-
Credits traded through Books and Claim	-
Palm Kernel (PK)	
Overall PK Production	11,626.99
Certified PK Production	2,013.05
Certified PK delivered as RSPO	1,968.99
Certified PK delivered as non-RSPO	-
Certified CPO delivered under other sustainable schemes	-
Credits traded through Books and Claim	-

**Table 4: Projected FFB received and CPO & PK dispatch by Sri Kamusan POM of next reporting period February 2022 – January 2023**

RSPO Supply Chain Model : Mass Balance	Total (MT)
FFB Received	358,866.67
FFB Processed	358,866.67
Certified FFB Processed	166,538.59
Certified CPO Production	35,555.25
Certified PK Production	7,304.71

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

Estate	Planted (ha)	Certified (ha)
Sri Kamusan Estate	1,661.16	2,832.00
Hibumas 1 Estate	1,775.58	2,449.38
Hibumas 2 Estate	2,287.08	3,472.62
Jebawang Estate	338.74	403.80
Sekar Imej Estate	889.08	3,642.00
Sapi Sugut Estate	548.04	1,458.30
<b>Total</b>	<b>7,499.68</b>	<b>14,258.10</b>

**Table 6: Planting profile for Sri Kamusan Estate**

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2000	1st	Mature	403.77	24.52
2002	1st	Mature	405.4	24.34
2003	1st	Mature	851.99	51.14
			1661.16	100
<b>Total</b>				<b>100.00</b>
<b>Remarks</b>		Sri Kamusan Estate – reduced 4.60 ha clearing as nursery.		

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Table 7: Planting profile for Hibumas 1 Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area (ha)	Percentage of planted area (%)
1999	1st	Mature	1040.35	58.59
2000	1st	Mature	205.86	11.59
2001	1st	Mature	224.30	12.63
2004	1st	Mature	121.89	6.86
2006	1st	Mature	119.24	6.72
2007	1st	Mature	63.94	3.60
<b>Total</b>			1775.58	100.00
<b>Remarks</b>	-			

Table 8: Planting profile for Hibumas 2 Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2000	1st	Mature	513.45	22%
2005	1st	Mature	792.47	34%
2006	1st	Mature	900.31	40%
2007	1st	Mature	80.85	4%
<b>Total</b>			2287.08	100.00
<b>Remarks</b>	*Hibumas 2 - reduced 16.34 planted Ha compare to last year due to 5.63 include in RaCP remediation area (proposed compensation area in Hibumas 2 Estate). 10.71 ha clearing as nursery.			

Table 9: Planting profile for Jebawang Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2003	1st	Mature	338.74	100
<b>Total</b>			338.74	100.00
<b>Remarks</b>	-			

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Table 10: Planting profile for Sekar Imej Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2004	1st	Mature	164.38	18.5
2005	1st	Mature	121.78	13.7
2007	1st	Mature	119.65	13.5
2008	1st	Mature	325.35	37.2
2009	1st	Mature	152.67	17.2
<b>Total</b>			883.83	100.00
<b>Remarks</b>	*Sekar Imej – reduced 7.66 planted Ha compared to last year due to the RaCP remediation area (compensation area in Sekar Imej Estate)			

Table 11: Planting profile for Sapi Sugut Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2005		Mature	396.93	72.4
2004		Mature	151.11	27.6
<b>Total</b>			548.04	100.00
<b>Remarks</b>	-			

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

The details of the contact person are as below:

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

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**3.0 AUDIT FINDINGS**

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

No changes

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

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

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

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

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

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

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

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

If no, please state reasons

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

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

No changes

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

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

3.5 Complaint received from stakeholder (if any)

No complaint received from stakeholder

**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 3) List : Nil

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

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

Total no. of minor NCR(s)  
(details refer to Attachment 3) List : Nil

Total no. of major NCR(s)  
(details refer to Attachment 3) List : Nil

**5.0 AUDIT CONCLUSION**

The audit team concludes that the organization has / [REDACTED]\* 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.

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**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 : MOHD AB RAOUF BIN ASIS



30/5/2022

(Name)

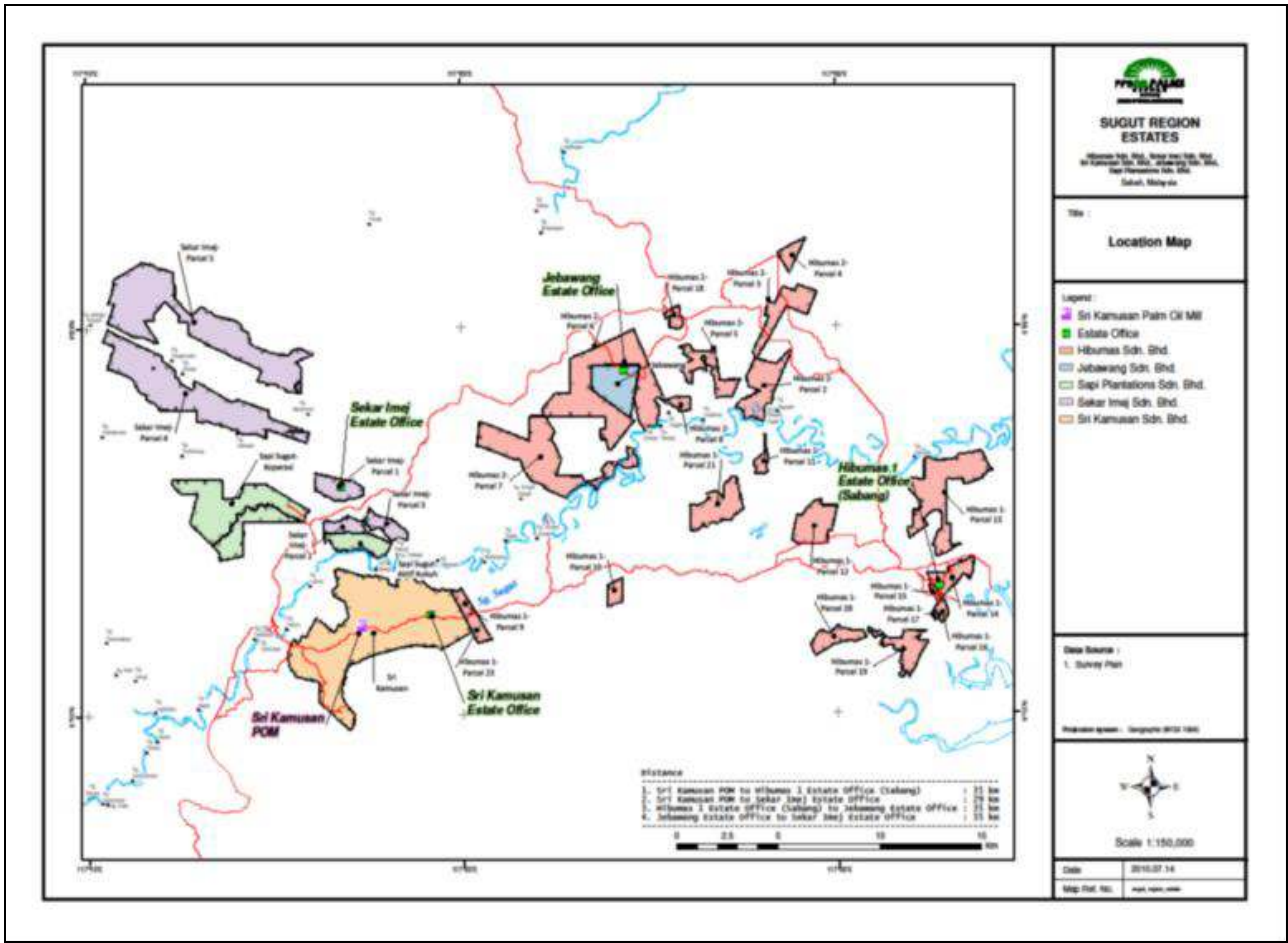
(Signature)

(Date)



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Attachment 1 - Map



## **SURVEILLANCE AUDIT PLAN**

### **1. Objectives**

The objectives of the audit are as follows:

- (i) To determine Certification Unit conformance against 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** : 28<sup>th</sup> February to 4<sup>th</sup> March 2022

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

- Sri Kamusan Palm Oil Mill
- Hibumas 1 Estate
- Hibumas 2 Estate
- Sekar Imej Estate
- Sapi Sugut Estate
- Sri Kamusan Estate
- Jebawang Estate

### **4. Reference Standard :**

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

### **5. Assessment Team**

- (i) Audit Team Leader: Mohd Ab Raouf bin Asis (MAR) - Social (External Stakeholder), Internal Stakeholder Mill
  - (ii) Auditor : Rohazimi Mat Nawi (RMN) - SCCS, Safety (Mill), Environment, GHG, Metrics Template  
 Dzulfiqar Azmi (DA) - Social (Internal Stakeholder Estate)  
 Rozaimie bin Ab Rahman (RAR) – GAP, Safety (Estate), TBP  
 Mohd Zulfakar bin Kamaruzaman (MZK) - HCV
  - (iii) Witnessed : N/A
  - (iv) Technical expert : N/A
- If there is any objection to the proposed audit team, the organization is required to inform the Lead Auditor/RSPO Section Manager.*

### **7. Audit Method**

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

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

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

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

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

The updated Metrics Template (as attached, the version 2.0) will be enforced from 1 August 2021. For audits conducted during the transition period from 1 June to 31 July 2021, members are encouraged to use the updated version but are also allowed to use the previous version (version 1.0). All audits conducted from 1 August 2021 onwards must use the updated Metrics Template (version 2.0).

**9. Audit Findings**

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

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

For minor non-conformities raised in the surveillance audit, corrective action shall be verified in the next audit. These shall be upgraded to major non-conformities if the corrective actions are not satisfactory implemented in the next audit. Recurring major non-conformities on the same indicator in successive surveillance audits shall result in the immediate suspension of the RSPO P & C certification shall be recommended.

**10. 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.

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

**12. 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.

**13. 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

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

## RSPO PUBLIC SUMMARY REPORT

Date / Time	Coverage of assessment / Activity / Site	MAR	RMN	DA	RAR
Day 1-28/2/22 (Monday) 8.30am – 9.00am	Opening Meeting – Venue: To be advised • Audit team Leader - Briefing on assessment objectives, scope, methodology, confidentiality clarification, audit criteria and programmes • Organization Representative - Briefing RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases, Time bound plan, actions taken to address previous audit findings.	/	/	/	/
9.00am – 1.00pm	<b>Site observation to Sapi Sugut &amp; Sekar Imej P1, P2, P3,P4,P5, P6, P7</b> <ul style="list-style-type: none"> <li>• Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with affected communities surrounding the estate</li> <li>• Interview with gender committee, safety committee, worker representative, contractors, supplier, etc.</li> <li>• Occupational safety &amp; health aspects, chemical management</li> <li>• Good Milling Practice / Good agricultural practices</li> <li>• Legal &amp; Other requirement</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• GHG Calculation</li> </ul>	/	/	/	/
1.00pm – 2.00pm	Lunch Break				
1.30pm – 5.00pm	Continue assessment at respective sites	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	MAR	RMN	DA	RAR
Day 2 – 1/3/22 (Tuesday) 8.30am – 1.00pm	<b>Travelling Mr Zulfakar, ETA at SDK 1.05 pm. Please arrange transport to pick up.</b>  <b>Site observation to Jebawang Estate &amp; Hibumas 2 Estate P1, P2, P3,P4,P5, P6, P7</b> <ul style="list-style-type: none"> <li>• Verification of basic information estate/Metric templates</li> <li>• Confirmation of time bound plan &amp; review of partial certification</li> <li>• Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>• Occupational safety &amp; health aspects , chemical management</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with affected communities surrounding the estate</li> <li>• Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc.</li> <li>• Land titles user rights</li> <li>• Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones.</li> <li>• GHG Calculation</li> <li>• New planting</li> </ul>	/	/	/	/

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1.00pm – 2.00pm	Lunch Break	/	/	/	/
1.30pm – 5.00pm	Continue assessment at respective site	/	/	/	/
<b>Date / Time</b>	<b>Coverage of assessment / Activity / Site</b>	<b>MAR</b>	<b>RMN</b>	<b>DA</b>	<b>RAR</b>
Day 3 – 2/3/22 (Wednesday) 8.30am – 1.00pm	<b>Site observation to Sri Kamusan POM</b> <b>P1, P2, P3, P4, P5, P6, P7</b> <ul style="list-style-type: none"> <li>• Supply Chain</li> <li>• Verification of basic information mill/Metric templates</li> <li>• Confirmation of time bound plan &amp; review of partial certification</li> <li>• Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>• Occupational safety &amp; health aspects, chemical management</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with affected communities surrounding the estate</li> <li>• Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc.</li> <li>• Land titles user rights</li> <li>• Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones.</li> <li>• GHG Calculation</li> <li>• New planting</li> </ul>	/	/		
8.30am – 1.00pm	<b>Site observation to Sri Kamusan Estate</b> <b>P1, P2, P3, P4, P5, P6, P7</b> <ul style="list-style-type: none"> <li>• Supply Chain</li> <li>• Verification of basic information mill/Metric templates</li> <li>• Confirmation of time bound plan &amp; review of partial certification</li> <li>• Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>• Occupational safety &amp; health aspects , chemical management</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with affected communities surrounding the estate</li> <li>• Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc.</li> <li>• Land titles user rights</li> <li>• Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones.</li> </ul>			/	/

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	<ul style="list-style-type: none"> <li>GHG Calculation</li> <li>New planting</li> </ul>				
1.00pm – 2.00pm	Lunch Break	/	/	/	/
2.00pm – 5.00pm	<p><b>Continue assessment at respective site</b></p> <p><b>Zulfakar continue to verify HCV at Sri Kamusan Estate and Hibumas 1 Estate</b></p>	/	/	/	/
<b>Date / Time</b>	<b>Coverage of assessment / Activity / Site</b>	<b>MAR</b>	<b>RMN</b>	<b>DA</b>	<b>RAR</b>
Day 4 – 3/3/22 (Thursday) 8.30am – 1.00pm	<p><b>Site observation to Hibumas 1</b> <b>P1, P2, P3, P4, P5, P6, P7</b></p> <ul style="list-style-type: none"> <li>Verification of basic information estate/Metric templates</li> <li>Confirmation of time bound plan &amp; review of partial certification</li> <li>Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>Occupational safety &amp; health aspects , chemical management</li> <li>Interview with workers, contractors etc.</li> <li>Environmental management, waste &amp; chemical management</li> <li>Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>Stakeholder consultation with affected communities surrounding the estate</li> <li>Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc.</li> <li>Land titles user rights</li> <li>Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones.</li> <li>GHG Calculation</li> <li>New planting</li> </ul> <p><b>Zulfakar continue to verify HCV at Sekar Imej, Sapi Sugut, Jebawang and Hibumas 2 Estate</b></p>	/	/	/	/
1.00pm – 2.00pm	Lunch Break	/	/	/	/
2.00pm – 5.00pm	<p><b>Continue assessment at respective site</b></p> <p><b>Zulfakar travel to SDK</b></p>	/	/	/	/
<b>Date / Time</b>	<b>Coverage of assessment / Activity / Site</b>	<b>MAR</b>	<b>RMN</b>	<b>DA</b>	<b>RAR</b>
Day 5 – 4/3/22 (Friday) 8.30am – 1.00pm	<p><b>Site observation to Sri Kamusan POM</b> <b>P1, P2, P3, P4, P5, P6, P7</b></p> <ul style="list-style-type: none"> <li>Verification of basic information estate/Metric templates</li> <li>Confirmation of time bound plan &amp; review of partial certification</li> <li>Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and</li> </ul>	/	/		

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	<ul style="list-style-type: none"> <li>neighbouring land use, riparian zone</li> <li>• Occupational safety &amp; health aspects , chemical management</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with affected communities surrounding the estate</li> <li>• Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc.</li> <li>• Land titles user rights</li> <li>• Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones.</li> <li>• GHG Calculation</li> </ul>				
8.30am – 1.00pm	<p><b>Site observation to Sri Kamusan Estate P1, P2, P3, P4, P5, P6, P7</b></p> <ul style="list-style-type: none"> <li>• Verification of basic information estate/Metric templates</li> <li>• Confirmation of time bound plan &amp; review of partial certification</li> <li>• Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone</li> <li>• Occupational safety &amp; health aspects , chemical management</li> <li>• Interview with workers, contractors etc.</li> <li>• Environmental management, waste &amp; chemical management</li> <li>• Social aspects -SIA, management plan &amp; implementation, workers' quarters,</li> <li>• Stakeholder consultation with affected communities surrounding the estate</li> <li>• Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc.</li> <li>• Land titles user rights</li> <li>• Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones.</li> <li>• GHG Calculation</li> </ul>	/		/	/
1.00pm – 2.00pm	Lunch Break	/	/	/	/
2.30pm –3.00pm	Continue assessment at respective site	/	/	/	/
2.30pm –4.00pm	Audit Team Discussion	/	/	/	/
4.00pm – 5.00pm	Closing meeting	/	/	/	/

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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.

<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	Yes	Sri Kamusan CU has a comprehensive system with respect to this Indicators. Request Forms were available for stakeholders or interested party to obtain information related to RSPO. Records of visit by the Government agencies, NGOs and local communities were established.
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	Yes	The estates and mill had identified personnel responsible for complaints. Records of communication were identified and maintained. Languages used in common are Bahasa Malaysia and English. On certain instances translator of employees' colleagues are applied for a better understanding of information and training purposes.
	1.1.3 (C) Records of requests for information and responses are maintained.	Yes	Sri Kamusan CU has kept all the records of requests for information and responses are maintained which included the government agencies, NGOs, local communities and others. Management documents relating to environment, social and legal issues, were available to the public except for those prevented by commercial confidential or where disclosure of information would result in negative environmental or social outcomes. The CU has provided relevant information (environmental, social and/or legal) as requested by the relevant stakeholder during the annual stakeholder meeting.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	Yes	Consultation and communication procedure used by the CU in handling internal and external communications is identified as Document No 'RSPO 1.1 Consultation and Communication Procedure' which was prepared by the EMU (Sustainability Department) of PPB Oil Palms Berhad. The CU has continued to use the internal communication through morning assemblies, notice boards and posters, suggestion boxes and complaint forms. External communication has been mainly through mail correspondence. The CU has also use the Stakeholders Meeting to serve as a forum to discuss issues of interest to the mills, estates, local government agencies and local communities (villagers).
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	Yes	List of stakeholders last updated in Jan 2022. The stakeholder list comprises of neighboring estates, smallholders, approved suppliers of services and consumable, government agencies and NGO's associations.
1.2 The unit of	1.2.1 A policy for ethical conduct is in place and implemented in all business	Yes	Sri Kamusan CU has developed and implemented Code of Ethical Conduct (June 2019) where the company implemented the integrity, respect & responsibility, enterprise and



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Clause	Indicators	Comply Yes/No	Findings
certification commits to ethical conduct in all business operations and transactions.	operations and transactions, including recruitment and contracts.		excellence during any business process. The policy was developed in Bahasa Malaysia, English and Bahasa English. The Code of Conduct comprises 3 main principles, name avoiding conflict of interest, avoiding misuse and/or abuse of position, and ensuring confidentiality of information and preventing misuse of information. The Code of Ethics prescribes the moral and ethical standard of behavior that is expected of all employees. The policy was enhanced further by developed Anti-Fraud Policy and Procedures dated 2007. The policy comprised on the event of non-compliances with the policy, it will impose penalties and lead to disciplinary actions.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	Yes	A system to monitor compliance is available. All written agreements (203 FFB Suppliers) known as "Akur Janji dan Persetujuan Bersama" was sampled at Sri Kamusan CU contain a clause on no child [para i], forced and trafficked labour [para ii]. Two (2) CPO and PK contractors This is stipulated under Para 8 [Contractor's Responsibility, Clause 5 of the Agreements which states that the Contractor warrants that it shall not use or promote use of child labour, forced, bonded labour or human trafficking.

### **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, Sri Kamusan CU 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.	Yes	The "Register of Legal and Other Applicable Requirement" was made available at Sri Kamusan CU. The document reviewed by the Sustainability Unit. Changes to the law and regulation are monitored by the Sustainability Unit - Manager. Various sources were referred in obtaining information about the updates of legal requirements. This includes checking with the industrial association (e.g., MPOA, EMPA, SECA, etc.), attending seminar/conference, buying of the law books, government agencies websites, etc.
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	Yes	A visit has been made to legal boundaries between Sri Kamusan Estate (Block 5) with Kg. Tangkangit, found only several red painted pole and clearly demarcated and maintained along the estate boundaries. Another visit to legal boundaries between Hibumas 1 Estate (Block 47) with IJM Plantation, and Hibumas 1 Estate (Block 23) with IDC found the boundary paint were maintained. Again, visit to Jebawang Estate (Block 10) adjacent with IJM Plantation the boundary stick was found maintained. Audit concludes that legal or authorised boundaries were clearly demarcated and visibly maintained.
2.2 All contractors providing operational	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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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>												
services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	Yes	Syarikat Paulus Enterprise has been stopping their work with Sapi Sugut Estate and Sekar Imej Estate w.e.f 31/12/2021. Only Landasan Kembar has been worked as contractor in Sapi Sugut and Sekar Imej Estate. Agreement reviewed and found to be appropriate.												
	2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	Yes	All written agreements known as “Akur Janji dan Persetujuan Bersama” was and it contains clause on no child [para i], forced and trafficked labour [para ii].												
2.3 All FFB supplies from outside the unit of certification are from legal sources.	2.3.1 (C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> <li>Information on geo-location of FFB origins.</li> <li>Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>One or more supporting documents for claims</li> <li>Valid MPOB license</li> </ul>	Yes	<p>Sri Kamusan POM have the map with geo-location of each FFB suppliers, ownership and MPOB licences for directly sourced of FFB.</p> <p>Based on the summary of FFB stakeholder in Sri Kamusan POM, there got several categories of FFB suppliers such as:</p> <table border="1"> <thead> <tr> <th>No</th> <th>Categories of suppliers</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Own estate</td> </tr> <tr> <td>2</td> <td>Associate estate</td> </tr> <tr> <td>3</td> <td>Big grower (more than 500 ha)</td> </tr> <tr> <td>4</td> <td>Big holder (within 40 to 500 ha)</td> </tr> <tr> <td>5</td> <td>Smallholders ( within 0 to 39 ha)</td> </tr> </tbody> </table> <p>Information on geo – location sighted in the mapping include GPS coordinates.</p>	No	Categories of suppliers	1	Own estate	2	Associate estate	3	Big grower (more than 500 ha)	4	Big holder (within 40 to 500 ha)	5	Smallholders ( within 0 to 39 ha)
	No	Categories of suppliers													
1	Own estate														
2	Associate estate														
3	Big grower (more than 500 ha)														
4	Big holder (within 40 to 500 ha)														
5	Smallholders ( within 0 to 39 ha)														
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	For indirectly sourced of FFB, SKPOM got from only 1 collection centre. The following of the collection centre - Koperasi Penanam Sawit Mampan Sugut Paitan Berhad. GPS location also provided.													

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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	<p>Sri Kamusan CU have management plan to achieve long-term economic and financial viability which was reviewed annually and implemented. Both the Palm Oil Mill and Estates had management plans (budgets) for the current year and projections up to year 2029.</p> <p>The yearly budget and projections were reviewed annually and compared against expenditure for each year. The parameters monitored remained essentially unchanged and included Capital (CAPEX) and Operating costs.</p> <p>Palm Oil Mill's budget include operating Expenditure and CAPEX. The operating costs included Processing which includes overheads, CPO &amp; PK transport, MPOB cess, access road maintenance &amp; Mill administration costs.</p> <p>On the Estates operating expenditure included expenditure for Replanting, Mature and Immature Oil Palm upkeep, Administration cost, and overheads like Housing and Machinery upkeep, allocation for sustainability implementation (environmental, social, occupational safety and health), infra-structure development (roads, etc.), and training, etc. The budget for 2021 and projections until year 2029 were made available to auditors.</p>
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	Yes	The replanting programme for the next five years had been prepared This programme reviewed once a year and is incorporated in their annual financial budget which reviewed in their office.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	Yes	<p>Several management reviews have been carried out to raised out and discussed related to internal &amp; external audit findings. Sighted meeting has been carried out on date in Feb 2022. Minutes of meeting was established for all relevant meeting. Among the agenda discussed were:</p> <ul style="list-style-type: none"> <li>a) Internal audit findings</li> <li>b) Appointment of PIC for the NCR raised</li> <li>c) Scheduled waste management</li> <li>d) Training on Company's Policies</li> <li>e) Water sampling</li> <li>f) External audit findings</li> <li>g) Performance crop &amp; cost</li> <li>h) Mitigation &amp; outstanding issues</li> </ul>

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
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 organization had established continuous improvement plan (CIP) and this action planned integrated with list of CAPEX for respective year. Sighted among the items been include were: 1. Replace of wooden pellets to plastic pellets. 2. Upgrade drainage system at line site 3. Improve existing building structure which is in poor condition (SW Store, Chemical store) 4. Sekar Imej Conservation Area project. 5. Installation of 1 unit ESP system to limit boiler smoke and particulate emission 6. Increase sterilizer efficiency 7. New instrument for POME performance monitoring 8. Install 400 kVA diesel generator
	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	The monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template together with palm trace renewal. This requirement refers to a small set of strategic outcome-based metrics, which are of value to growers, relates directly to the P&C, and aligns with the RSPO Theory of Change1 (ToC) and RSPO organizational Key Performance Indicators (KPIs).
3.3 Operating procedures are appropriately documented, consistently implemented and monitored.	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	Yes	Operating procedures are appropriately documented, consistently implemented and monitored in Sri Kamusan CU. Standard Operating Procedures (SOPs) for the unit of certification are in place.
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	Yes	Sri Kamusan CU had in place mechanisms to check consistent implementation of procedures. The several mechanisms used to check on consistent implementation of procedures used by CU were: <ul style="list-style-type: none"> <li>• Internal Audits</li> <li>• RSPO Audits</li> <li>• Stack Emission Monitoring Reports twice a year</li> <li>• Monthly Visits by External Electrical Engineer</li> <li>• Oil loss checks</li> <li>• Crop quality checks</li> <li>• RSPO and ISCC audits</li> <li>• PA's visits by Inspectorate,</li> <li>• visits by Agronomists</li> </ul>
	3.3.3 Records of monitoring and any actions taken are maintained and available.	Yes	Evidence was available to demonstrate that records of monitoring and the actions taken by Sri Kamusan Palm Oil Mill were maintained and kept for a minimum of 12 months.
3.4 A comprehensive Social and Environmental	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory	Yes	Not applicable

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Clause	Indicators	Comply Yes/No	Findings
<p>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.</p>	<p>methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.</p>		
	<p>3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p>	<p align="center">Yes</p>	<p>Social Impact Assessment (SIA) Report for Sri Kamusan CU was carried out independently. The assessment was conducted in 2010 by the Malaysian Environmental Consultants Sdn Bhd, and a report entitled "Impact Assessment for Sugut Region Estates (PPB Oil Palms Berhad), Beluran, Sabah, Malaysia. Internal and external stakeholders were consulted during the assessment. The assessments were used methodology of interview workers based on workstation, harvesters, sprayers, worker representatives, gender committee, contractor, supplier, local community, neighbouring estate/smallholders, government agencies, CLC/school, Beluran District Office, Beluran Forest Department, and Agriculture Department. The SIA Report also included the baseline for socio economic data of all estates and mills and the social profile, as well as their stakeholders. The report also contained the estates' and mill's background information, labour policies, grievance procedures (internal and external), sexual harassment policies, facilities and amenities offered by the estates, and the social impact assessment procedures and results. The secondary data collection – document review/file checking also been made. The report includes both positive and negative impact and its recommendation.</p>
	<p>3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p>	<p align="center">No</p>	<p>The social management action plans are being reviewed and updated on an annual basis at Sri Kamusan CU. This takes into account inputs from external stakeholder meetings, OSH Committee meetings, as well as Women &amp; Children Committee meetings. Among the social issues for management and monitoring were COVID 19 issues, vaccine programme, school issues, groceries prices, safety issues related to heavy machineries passing by the workers' housing, making sure PPE replacement is always available, replacement of old workers' housing, and documentation and immunisation of foreign workers' children. The SIA review process had included stakeholders' consultation with regards to social issues. 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. Sighted the latest external stakeholders' minutes meeting for Sri Kamusan CU was conducted independently. For Sekar Imej &amp; Sapi Sugut Estate was carried out on 10/02/2022, Hibumas 2 &amp; Jebawang Estate on 09/02/2022, Sri Kamusan on 27/01/2022 and Hibumas 1 Estate on 08/02/2022. The consultation was carried out to external and internal stakeholders i.e. government agencies, school, villagers and private sectors (contractors and neighboring estates). Evidence of the above stakeholder consultation conducted are available and the stakeholder feedback were recorded in the SIA action plan.</p> <p>However, the social assessment action plans FY22 for Sri Kamusan CU were not reviewed and updated regularly, causing the following social issues faced by the workers not taken into account. In particular, the following issues were not participatory assessed:</p>

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Clause	Indicators	Comply Yes/No	Findings
			<p>1. Children's education at Petagas Division</p> <p>2. Action plan on Community Learning Center (CLC) status/progression – closed due to no replacing teacher</p> <p>3. Sharing 2 family in 1 house due to limited housing unit</p> <p>4. Children passport (Boncing) payment via monthly deduction was not clear clarified to the workers</p> <p>As a result, Major NCR DA 01 2022 was raised.</p>
3.5 A system for managing human resources is in place.	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.	Yes	Employment procedures which include recruitment, selection, hiring and promotion are contained in a document entitled Recruitment of Workers PPB/HR/RSPO 6.12.3/220515. For matters related to termination of employment and retirement, these are contained in employment contracts, which are available to workers and their representatives. Clause 2 of the employment contract states that retirement age for workers is 60.
	3.5.2 Employment procedures are implemented, and records are maintained.	Yes	Based on the sampling of the workers' employment contracts and personal files, there is evidence that the employment procedures on recruitment, selection, hiring, promotion are implemented, and records maintained. No termination has been carried out, and so this could not be verified during the audit. Hiring process of submitting job application, interviews, medical check-ups, issuance of offer letters, and performance assessments were sighted for Malaysian workers.
3.6 An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	Yes	<p>Occupational safety and health policy with revision dated on 21/03/2019 are available in English and Bahasa Malaysia. The policy has been communicated to all levels of the organization through morning muster briefings and also displayed prominently at the notice board of the mill/estate office and Muster Ground. Random interviewed with employees showed that they generally understood the basic requirements of the policy.</p> <p>The hazard identification, risk assessment and risk control (HIRARC) procedure has been established. Sri Kamusan CU have conducted the risk assessment on all its operation as well as determining their control measures. The risk is assessed through the implementation of HIRARC to all estates in the CU. Sri Kamusan CU have implemented a SOP that states the importance of risk assessment through HIRARC. All work units that have been identified to have potential risks are documented and the sampled areas are as follows. Mitigation plans and control procedures such as PPE, administrative control and trainings were documented.</p>
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	Yes	Occupational health and safety (OHS) management plan for Sri Kamusan CU had been established. The OHS management plan sighted addressed issues related to hazards and risks, legal register and its requirements for compliance, OSH awareness and training program, accident and emergency procedures, audiometric test, use of PPE, OSH Committee meetings, etc. Generally, the OSH plans 2021 were acceptable. Sighted several safety trainings was conducted by the estate management:

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	Yes	Formal training programmes for 2021/2022 that covered aspects of the RSPO Principles and Criteria, with regular assessments of training needs were available for all the audited sites. Training Plan was for each operating unit were established. A training need identification matrix has been established with target dates for the training identified. The training program includes: <ul style="list-style-type: none"> <li>• ESH Legal &amp; Other requirements</li> <li>• Safe handling of electrical equipment</li> <li>• Use &amp; Standard Exposure of Chemical Hazardous to Health (USECHH) 2000</li> <li>• Accident Investigation Techniques</li> <li>• Milling Activities Training i.e., Boiler Station, Sterilizer Station, EFB Press</li> <li>• Estate Activities Training i.e., Harvesting, Spraying, Manuring</li> <li>• Emergency Respond Plan Training (e.g., Chemical spill, poisoning, Fire. Lightning)</li> <li>• Competent First Aider Training</li> <li>• First Aid Awareness Training – All Workers</li> <li>• Scheduled waste management</li> <li>• Safe Work Procedure for All Stations.</li> <li>• Defensive Driving Training</li> <li>• Social Training</li> <li>• HCV/Bio D Training</li> </ul>
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	Yes	Available
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	Yes	Training related to Supply Chain Certification System been conducted in May & Aug 2021 by respective from HQ involved employees from related areas.

**SUPPLY CHAIN REQUIREMENTS FOR MILLS**

<b>Ref. in RSPO SCCS</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
3.8.1	Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from	Yes	Not applicable as this Sri Kamusan mill currently on MB system.

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, the inly MB Module is applicable.		
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 <sup>rd</sup> party certified supply base.	Yes	Sri Kamusan POM received certified FFB from Sri Kamusan CU which is Sri Kamusan Estate, Hibumas 1 Estate, Hibumas 2 Estate, Sekar Imej, Jebawang Estate and Sapi Sugut Estate. And Uncertified FFB from Surrounding Smallgrower and Small holder which is 212 suppliers. Thus, Sri Kamusan POM has qualified for the Mass Balance chain system and module. The organization monitored the status of certified and uncertified FFBsupplier thru Mass Balance bookkeeping with latest updated as of March 2022.
3.8.3	The estimated tonnage of CPO and PK prod that could potentially be produced by the certified mill shall be recorded by the CB in the PS of the P&C certification report. This figure represents the total volume of 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 ASA report.	Yes	Available, as in Table 4 of this report.
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization.	Yes	The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. The registration information were: Name: Sri Kamusan Palm Oil Mill Country: Malaysia. Member Category: Oil Mil Core product: Palm Oil



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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.5	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>• Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard.</li> <li>• The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</li> </ul>	Yes	<p>Sri Kamusan's procedure dated 1 September 2020 [SKPOM-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"> <li>- Mill Supply Chain Definition</li> <li>- Management Representative</li> <li>- Purchasing and Goods In</li> <li>- Outsourcing</li> <li>- Sales and Goods Out</li> <li>- Registration of Transactions</li> <li>- Training</li> <li>- Record Keeping</li> <li>- Claims</li> <li>- Complaints Procedure</li> <li>- Internal Audit</li> <li>- management Review</li> <li>- Supply Chain Model – Mass Balance</li> <li>- GHG Tabulation for RSPO Certified Palm Oil Mill</li> <li>- Appendix A</li> <li>- Appointment letter dated July 2021 for the Sr. Mill Manager as management representative of Sri Kamusan Palm Oil Mill.</li> </ul> <p>- Training has been conducted in Aug 2021 by internal trainer to include relevant personnel such as, security, Weighbridge clerk, supervisor, and PIC related to SCCS Requirement.</p> <p>- Training Plan has been developed for the year of 2021 and 2022.</p> <p>During visit at Sri Kamusan POM staff, Weighbridge Clerk was able to demonstrate awareness of the fertilizer's procedures for the implementation of SCCS standard.</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"> <li>• Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>• Effectively implements and maintains the standard requirements within its organisation.</li> <li>• Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non- conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports.</li> </ul>	Yes	<p>Internal audit has been conducted on in Aug 2021 by Lead by Sustainability &amp; supply chain personnels from HQ. There is a supply chain procedure in file, SKPOM – RSPO – SCC. The internal audit procedure also covered the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>During internal audit there was no NCR has been given by Internal auditor to CU and been reported during management review.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.7	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	Yes	<p>Sri Kamusan POM had received certified FFBs from the CU's own supply bases as well as non-certified FFBs from outsiders. There were Sri Kamusan Estate, Hibumas 1 Estate, Hibumas 2 Estate, Sekar Imej, Jebawang Estate and Sapi Sugut Estate. And Uncertified FFB from Surrounding Smallgrower and Small holder which is 111 suppliers</p> <p>Base on inventory record no overproduction for CSPO and CSPK from period March 2020 to April 2021 and May 2021 to Jan 2022.</p> <p>The organization had maintained procedure of nonconformity material and/ or documents inside SKPOM-RSPO-SCC.</p> <p>The Weighbridge Clerk checked and verified the consignment notes issued by the supplying estates for the in-coming RSPO and non-RSPO FFBs. SKPOM still kept copies of the FFB Consignment Notes or FFB Delivery Notes issued by the supplying estates.</p> <p>A total of randomly selected FFB delivery notes/dispatch tickets for RSPO-certified FFBs issued by the supplying estates on the in-coming FFBs were verified. It was found that all delivery notes/dispatch tickets had indicated the estate's RSPO Certificate number, the name of the supplying estate and the quantity (weight in Kg) of the FFBs.</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"> <li>a) The name and address of buyer;</li> <li>b) The name and address of the seller</li> <li>c) The leading or shipment/delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation</li> <li>i) A unique identification number</li> </ul>	Yes	<p>Documented procedures related to sales and goods out were sighted and found adequate. Based on verification during the audit, SKPOM has deliver certified materials to end buyer such as Lahad Datu Edible Oil Sdn Bhd (KCP), and Sandakan Edible Oil Sdn Bhd. Therefore, following are sample of certified CPO &amp; PK sales which comply to standard requirement.</p>

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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> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.</p>	Yes	<p>Sri Kamusan POM has outsourced to the three (3) transportation of certified CPO and certified PK. An agreement covering the outsources activity were sighted. It has been noted that the contract agreement has highlighted the information on the implementation of RSPO standard. There is also stated in the contract point no. 8 that the transporter shall comply with 'to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary'</p>

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<b>Ref. in RSPO SCCS</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
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 2022.
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	Yes	There were no new contractors used for the processing or production of RSPO certified materials
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 products held in stock.	Yes	Relevant record was maintained for more than 2 years as per Standard operating procedure for Sustainability Supply Chain
	iii ) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	Yes	Not applicable since Sri Kamusan POM was using Mass Balance Module.
	iv) For Mass Balance Module, the mill: a. shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to	Yes	SKPOM has maintained the three-monthly basis accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK. Record titled as <i>“RSPO &amp; MSPO Mass Balancing Record for Oil Mills. The Mass Balance Record for Oil Mills – SKPOM indicated both positive balances for the certified CPO and palm kernel with latest updated period from May 2021 to January 2022 on 7<sup>th</sup> February 2022.</i>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>conversion ratios stated by RSPO.                      c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.)</p>		
3.8.13	<p>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.</p>	Yes	Sri Kamusan POM process all the received certified crop & their processing output will be based on their actual Oil Extraction Rate (OER) as well as Kernel Extraction Rate (KER) and been recorded inside Monthly Production Report.
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	Yes	
3.8.15	<p>Processing                      For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	Yes	Not applicable since Sri Kamusan POM was using Mass Balance Module.
3.8.16	<p>Registration of Transactions                      i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not</p>	Yes	The registration of transaction being carried out by Sustainability and supply chain department from HQ. Mill receive copy of transaction input to the system on monthly basis based on contract summary (buyer weight being put in).

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>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>		
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	Yes	Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. SKPOM has not use RSPO corporate logo as well as trademark logo.

**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	The Human Rights Framework dated 1 May 2019 and Policy on Human Right Defenders (HRDs) dated in Dec 2021 provides for protection for HRD and Whistle blowers and states that no reprisals would be taken against whistle blowers and HRDs. Similarly, the Whistleblowing Policy dated in Feb 2018 also aims to protect whistle blowers from reprisals or victimisation. These Policies were communicated during stakeholder meetings, policy briefings and understanding among all levels of workforce and local communities of what HRD and the prohibition against retaliation towards HRDs was increased. It was noted that all of them were aware and understood related to HRD policies.
	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 Sri Kamusan CU.



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Clause	Indicators	Comply Yes/No	Findings
<p>4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.</p>	<p>4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p>	<p>Yes</p>	<p>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. Anonymity of complainants and whistleblowers are ensured under the Sri Kamusan CU Code of Business Conduct which provides an avenue to direct the grievances to a Hotline number, toll-free numbers, email, fax, or letters to the Whistleblowing Unit at HQ.</p>
	<p>4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p>	<p>Yes</p>	<p>Procedures are in place called "Consultation and communication procedure, document no: RSPO 6.2" to ensure affected parties understand the Dispute and Resolution Procedures. Verbal explanation is given in an easy-to-understand language accompanied by pictorial explanations, 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.</p>
	<p>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.</p>	<p>Yes</p>	<p>There is evidence that Sri Kamusan CU keeps parties to a grievance informed of progress. Verified were the complaints received from workers on housing defects and recorded in the complaints book. Also recorded in the complaints book was the Manager's approval for repair given, update of the repair progress and acknowledged by the complainant by appending his signature in the complaint book.</p>
	<p>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.</p>	<p>Yes</p>	<p>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.</p>
<p>4.3 The CU contributes to local sustainable development as agreed by local communities.</p>	<p>4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p>	<p>Yes</p>	<p>Sri Kamusan CU is able to demonstrate that contributions to community development have been made based on consultation results with the local communities. This was confirmed during audit interview with the local communities.</p> <p>Other contributions to the local community developments based on consultation include villagers' access to free medical treatment at the estate clinic, and job opportunities.</p>

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Clause	Indicators	Comply Yes/No	Findings
<p>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.</p>	<p>4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through an FPIC process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available.</p>	<p>Yes</p>	<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 PPB Plantation has the right to use the land which was legitimately owned by their company.</p> <p>Evidence of legal ownership of the land including history of land tenure was verified during this audit. Each estate was provided with legal use of the land through a Country Lease signed by the Director of Lands and Surveys of Sabah following the payment of premium. This document was made available by all the individual estates. It was also confirmed that there was no history of customary land tenure, recognized Native Customary Right (NCR) land.</p>
	<p>4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p>		<p>It was evident that there were ongoing discussions and consultations with regards to the land encroachment (claimed and requested, since 1988) by one of the villages against Hibumas 2 Estate. Detailed information was provided in the confidential version of this report. As of to date (during the audit in ASA1), the estate management currently waiting from Land Department of Kota Kinabalu to answer the issue in discussion. The Land Department yet to give respond to this.</p>
	<p>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.</p>	<p>Yes</p>	
	<p>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.</p>	<p>Yes</p>	
	<p>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</p>	<p>Yes</p>	

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	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 Hibumas 2 Estate, where Wilmar still in process to develop map of encroached area. ESH officers has monitored the area by monthly basis & found that no further encroachment until this audit in 2021.
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	Yes	All relevant information was available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.
	4.4.5 (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	Yes	Communities were represented by their village head. The representatives were chosen by the communities.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	Yes	The implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. As explained in indicator 4.4.2, it has been verified that the land is now legitimately owned by Wilmar Sri Kamusan CU since 1988. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no new issues regarding land with villagers, local community and neighbouring estate.
4.5 No new plantings are established on local peoples' land where it can be	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 Sri Kamusan CU and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is legitimately owned by Wilmar Sri Kamusan CU since 1988. The audit team had confirmed that there were no land issues related to previous owners except for the new claim made by stakeholder as per explained in indicator above.

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Clause	Indicators	Comply Yes/No	Findings
<p>demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>	<p>4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p>	<p>Yes</p>	<p>As explained in Indicator 4.4.1, it has been verified that the land is now legitimately owned by Wilmar Sri Kamusan CU since 1988. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no new plantings in Sri Kamusan CU</p>
	<p>4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new ops.</p>	<p>N/A</p>	<p>There were no new plantings in Sri Kamusan CU. Thus, indicator was not applicable</p>
	<p>4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p>	<p>N/A</p>	<p>There were no new plantings in Sri Kamusan CU. Thus, indicator was not applicable</p>

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Clause	Indicators	Comply Yes/No	Findings
	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 ops on their lands.	N/A	There were no new plantings in Sri Kamusan CU. Thus, indicator was not applicable
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	N/A	There were no new plantings in Sri Kamusan CU. Thus, indicator was not applicable
	4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	N/A	There were no new plantings in Sri Kamusan CU. Thus, indicator was not applicable
4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with thru a documented system that enables indigenous peoples, local communities and other stakeholders to	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	<p>In the event of a dispute, the Sri Kamusan CU will manage it through the “Dispute and Grievances Procedure”. The Dispute and Grievance Procedure commences with the receipt of complaint from any party, its investigation, proposed solutions and acceptance of the solutions or otherwise. If the proposed solution was rejected, the dispute will be brought for third party arbitration. Grievance or dissatisfaction and request for services on the part of the employees can be conveyed through the “Borang Aduan (Complaints Form)”, and the “Borang Permohonan (Request Form)”.</p> <p>In accordance with the Dispute and Grievances Procedure, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department at the Wilmar Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.</p>

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
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 Sri Kamusan 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 Sri Kamusan CU are made available in appropriate forms and languages. The following relevant documents were made available in Bahasa Malaysia, which is a language that every party was conversant in, were made available, sighted and verified during the audit: <ul style="list-style-type: none"> <li>• Employment contracts of workers.</li> <li>• Action Plan for the Social Impact Assessment (2019 – 2020)</li> <li>• All evidence regarding land claim since 2015 are made available to everyone upon request.</li> </ul>
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	Yes	In the event of a dispute, Sri Kamusan CU will manage it through the “Dispute and Grievances Procedure”. The Dispute and Grievance Procedure commences with the receipt of complaint from any party, its investigation, proposed solutions and acceptance of the solutions or otherwise. If the proposed solution was rejected, the dispute will be brought for third party arbitration. Grievance or dissatisfaction and request for services on the part of the employees can be conveyed through the “Borang Aduan (Complaints Form)”, and the “Borang Permohonan (Request Form)”.  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	N/A	There were no new plantings in Sri Kamusan CU. Thus, indicator was not applicable

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Clause	Indicators	Comply Yes/No	Findings
	and documented and made available to affected parties.		
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	N/A	There were no new plantings in Sri Kamusan CU. Thus, indicator was not applicable
4.8 The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.	4.8.1 Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	Yes	The right to use the land was demonstrated and not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights. As explained in indicator 4.4.2, it has been verified that the land is now legitimately owned by Wilmar Sri Kamusan CU since 1988. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no new issues regarding land with villagers, local community and neighbouring estate.
	4.8.2 (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 Sri Kamusan CU since 1988. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no new issues regarding land with villagers, local community and neighbouring estate.
	4.8.3 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	Yes	The right to use the land was demonstrated and not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights. As explained in indicator 4.4.2, it has been verified that the land is now legitimately owned by Wilmar Sri Kamusan CU since 1988. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no new issues regarding land with villagers, local community and neighbouring estate.

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Clause	Indicators	Comply Yes/No	Findings
	land use rights, these claims will be settled using the relevant reqs.		
	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 neighboring communities where applicable).	Yes	The right to use the land was demonstrated and not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights. As explained in indicator 4.4.2, it has been verified that the land is now legitimately owned by Wilmar Sri Kamusan CU since 1988. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no new issues regarding land with villagers, local community and neighbouring estate.

**Principle 5: Support smallholder inclusion**

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

Clause	Indicators	Comply Yes/No	Findings
5.1 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	Yes	During the audit, it was verified that the current and past prices for FFB (year 2021 Jan – April 2021) was displayed at the notice board near the Sri Kamusan Palm Oil Mill weighbridge.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Yes	Sri Kamusan regularly explains the FFB Pricing to Smallholders. Training/briefing were conducted at Sri Kamusan POM. The stakeholder information briefing concerned to FFB qualities, FFB grading, calculation payment by MPOB, oil extraction rate (OER). The calculation method of pricing was made known and given to the Smallholders. Field days were organised monthly by the mill to all the small holders from the supplying list.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Yes	The FFB prices in Sri Kamusan POM was adopting from the MPOB Pricing. All prices are calculated by the MPOB and the mill take the price and follow what MPOB guided. Interview with individual who are sending FFB to Sri Kamusan POM revealed that they are satisfied with the current price and they are of the opinion that Sri Kamusan POM Mill quantum is quite fair compare to other outsider Mills.
	5.1.4 (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These	Yes	There was no contract or bond for FFB outside supplier sending crop to the Sri Kamusan POM. The Suppliers are freely to choose the mill choice of theirs.



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Clause	Indicators	Comply Yes/No	Findings
	include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.		
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	Yes	Interviews were conducted with the transport suppliers as follows for the Sri Kamusan Palm Oil Mill, a) The contractors have been providing their services for more than 2 years. Their contracts are signed annually, and containing schedule of rates, conditions of contract, event of default, payment terms according to the volume, diesel price and distance. b) Consultations with contractors confirmed that they understood the salient points in the agreement, namely contract duration, rate of payment, their obligations under the contract, etc. c) They also confirmed that contract entered into are valid, fair and transparent as the terms of payment are being negotiated upon prior to signing.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	Yes	All contractor confirmed that payments were received within a reasonable timeframe which is 7-10 days after submission of invoice. And receipts contain specifying price, weight, deductions and amount paid are given.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	Yes	Weighing Equipment in Sri Kamusan POM has been calibrated on a yearly basis.
	5.1.8 The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	Yes	Wilmar supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. Sighted that latest Stakeholder meeting in May 2019 to promote on RSPO certification. However, the Growers and villagers were not in favor in the implementation due to high cost.
	5.1.9 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	Yes	Procedure on “Dispute and Resolution Procedure” is in place. The Dispute and Resolution 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.
5.2 The unit of	5.2.1 The unit of certification consults with interested smallholders (irrespective of	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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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.	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.		internal control system (ICS), who holds the certificates, and who holds and sells the certified material. Sighted that latest Stakeholder meeting on December 2019 to consults with interested smallholders including women or other partners in their supply base to assess their needs for support to improve their livelihoods and 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	
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	Yes	
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	Yes	
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	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 (community Based Development committee) meeting on December 2019 to consults with interested smallholders including women or other partners in their supply base to assess their needs for support to improve their livelihoods and to promote on RSPO certification there is also training for pesticide handling and fertilizer application training in this meeting. However, the Growers and villagers were not in favor in the implementation due to high cost.
			Currently Wilmar has created a system to trace their stakeholder around their estates. But so far growers and smallholders in Sabah are willing to join the WAGS to get certification but for smallholder around SKPOM CU doesn't want to involve because of financial restriction. But Wilmar do have a report and always publicly available in their website.

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**Principle 6: Respect workers' rights and conditions**

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

<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
6.1 Any form of discrimination is prohibited.	6.1.1 (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	Yes	Sri Kamusan CU subscribes to Wilmar's Equal Opportunity Policy. This policy sets out the CU's position on equal opportunity in all aspects of its employment including recruitment, training and promotion. It was publicly available at all estates and the Mill. The policy statement emphasised its support for the principle of fairness and non-discrimination, and aims to treat individuals with dignity and respect, free from unlawful and unethical discrimination. It aims not to discriminate on gender, race or ethnic origin, disability, sexual orientation, age, or faith; but to build a global and able workforce that is based on meritocracy.
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.	Yes	Based on documentation reviewed such as employment contracts and letters of offer, pay slips, allocation of houses at workers' housing and information obtained during audit interviews, there is no evidence that local and foreign workers, women and local communities have been discriminated against. Review of the contracts entered with recruitment agent also stated that no recruitment fee is payable by migrant workers.
	6.1.3 The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	Yes	As stipulated in the "Recruitment selection, Hiring and Promotion" 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. Based on documentation reviewed such as employment contracts and letters of offer, pay slips, allocation of housing at the linesite and audit interviews, there is no evidence that local and foreign workers, women and local communities have been discriminated against. Interviews conducted with workers (male, female, local and migrant) as well as local communities also confirmed that this is so. There is also no evidence of payment of recruitment fees by migrant workers.
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	Yes	Based on documents, confirmed by the Health Assistants and workers at the Sri Kamusan CU, pregnancy tests were conducted when the workers presented themselves at the estate clinic and not conducted in a discriminatory manner. Sri Kamusan CU has collaboration with Klinik Kesihatan Lingkabau & Klinik Kesihatan Sungai-sungai for monthly monitoring health of mother and children and immunisation programme for baby.
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	Yes	The gender committees throughout the Sri Kamusan CU are known as the Women and Children Committees. Membership comprises female employees and the employees' wives. Based on interviews of the committee members and review of meeting minutes, the Committees main activities are to provide awareness to its members on issues of concern. These relate to sexual harassment, domestic and other forms of abuse,

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Clause	Indicators	Comply Yes/No	Findings
	6.1.6 There is evidence of equal pay for the same work scope.	Yes	<p>children's health, immunization and education, as well as women's reproductive rights and to conducted assessment need for new mothers.</p> <p>The equal opportunities policy which states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. The Social Policy was displayed on notice boards in both Bahasa Malaysia and English. And interview with workers' local female, migrant (Indonesia) and local male they agreed that they receive equal pay for the same work scope. For example, Sprayer gang has been paid by piece rate and the same gang also receive the piece rate pay, for harvester also they receive same rate as all harvester in the estate, only the difference is the rate for tall palm and the short palm. For mill and estate general workers they receive daily payment as per Minimum Wages Order 2020.</p>
6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).	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	<p>Pay and conditions are documented and made available during the audit. These are contained in the workers' payslips and employment contracts. Pay slips were sighted and are provided to workers on a monthly basis as confirmed during interview with management. Pay slips for Mill and Estate workers show breakdown for all work done such as allowances received, deductions, no. of days worked, any overtime hours performed. It was also verified that workers are being paid in accordance with the requirements stipulated under the Minimum Wages (Amendment) Order 2020 and the Sabah Labour Ordinance.</p> <p>Documentation of pay are available in the form of monthly pay slips, and conditions of pay are contained in employment contracts and letters of employment offer. Copies of these documents are provided to the workers. Briefing on relevant provisions on the Sabah Labor Ordinance on their rights under the employment contract such as public holidays, paid annual leave, paid maternity leave, final repatriation costs to be paid by employer, and termination of contract.</p>
	6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.	Yes	<p>Contracts and conditions of employment are contained in employment contracts signed between the Mill and respective estates on one hand, and their workers on the other. The employment contracts sampled were prepared in either Bahasa Indonesia or in dual-language, namely English and the language commonly used in the worker's country of origin. Among others, the contracts defined the place of work, wages, working hours, medical, accommodation, reasons for dismissal/termination, SOSCO, recruitment free, holiday entitlement, rest day, sick leave, annual leave, maternity leave, workplace transportation, resignation, safety &amp; health, others Labour regulation and compliance, complaint and others term and conditions. For the all workers, there is evidence that the payment of statutory contributions such as EPF (for local worker only), SOCSO and Employment Insurance Scheme (for local worker only), are being made in accordance with the relevant legal provisions.</p>

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Clause	Indicators	Comply Yes/No	Findings
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	Yes	The Sri Kamusan CU have implemented same as Wilmar to complied with legal requirements and Sabah Labour Ordinance and Minimum Wages Order (Amendment) 2020 on regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements. The working hours as per Sabah Labour Ordinance were, working hours for 8 hours and 0.5 hours break in the between the time. The time for break at the all Estate is 1030-1100am. For overtime, it has been mutually agreed upon between the management and workers and met the legal requirements. Overtime will be offered when there is additional job and no discrimination observed.
	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	The Sri Kamusan CU provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to all workers. Linesite inspection was conducted weekly by the Hospital Assistant in POM and all estates using the housing weekly inspection checklists. Any issues found during the inspection was remarked in the checklist and action will be taken accordingly.
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	Yes	All units within Sri Kamusan CU have their own canteen/grocery store which sells basic items such as eggs, flour, rice, vegetables, frozen food such as fish, meat, onions, etc. Items seen in the stores are adequate, clearly labelled and within the expiry dates. Workers interviewed informed that they purchase items from these stores, and are able to either pay in cash, or on credit.
	6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.  PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a "decent living wage" is in	Yes	Based on pay slips sighted, all sampled workers who complete the number of days offered in a month receive at least minimum wages applicable, which is RM1,100 per month, or more. Sri Kamusan CU also has carried out the calculation of prevailing wages and in-kind benefits as evidenced from Doc SKPOM/RSPO 6.2.6/0320. The calculation took into account housing, electricity, water, education, childcare and healthcare. Based on the breakdown given, the calculation of prevailing wages including in-kind benefits is reasonable.

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Clause	Indicators	Comply Yes/No	Findings
	<p>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"> <li>• An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers.</li> <li>• There is annual progress on the implementation of living wages</li> <li>• Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment.</li> <li>• The unit of certification may choose to implement the “living wage” payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation</li> </ul> <p>Until such time where the Malaysian version of “decent living wage” has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid.</p>		
	<p>6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p>	<p>Yes</p>	<p>There are no casual workers hired in Sri Kamusan CU and supply bases. All employees are permanent employee known as checkroll workers (local and foreign workers). All permanent and fulltime employment used for all core work as the general worker, mandore, staff, etc. based on their employment contract sighted in clause 6.2.2. Contract workers mainly for FFB lorry drivers and machineries drivers and under contractor management.</p>
<p>6.3 The unit of certification respects</p>	<p>6.3.1 (C) A published statement recognising freedom of association and right to collective bargaining in national</p>	<p>Yes</p>	<p>A published statement recognizing freedom of association is available. It is contained in Clause 3 (para ii) of Wilmar’s No Deforestation, No Peat, No Exploitation Policy. These rights include those of personnel to form and join trade unions of their choice, and to</p>

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
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.	languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.		bargain collectively. It also states that where the right to freedom of association and collective bargaining is restricted by law, parallel means of independent and free association and bargaining are made available for all such personnel. This Policy is available in English and Bahasa Malaysia. These policies were communicated during stakeholder meetings and morning muster.
	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 were no trade unions at Sri Kamusan CU. However, the Workers' Welfare and Social Committees have been established at every unit. The Committee comprise management and worker representatives. Evidence is available that management holds regular meetings with the Workers' Welfare and Social Committees. The interval meeting was carried out by forthrightly basis. This also been implemented due to impact assessment. Main reason to gather the information such as feedback from the workers in term of Social, Safety, Environmental, Welfare issues, etc. All the feedbacks were highlighted in the minutes meeting and SIA action plan.
	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	Based on the worker's and management interview, the selection of representative workers made from the election among the member without management interference. Foreign workers and contractor workers included in the committee formation and appointment letter sighted.
6.4 Children are not employed or exploited.	6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	Yes	Sri Kamusan CU subscribes to Wilmar's Child Protection Policy. The Policy states Wilmar does not tolerate child labour, any forms of child exploitation and child abuse. Sri Kamusan CU also has an SOP entitled Preventing Child Labour and Remedial Action in Case of Child Labour. This SOP also details out the remediation action to be taken should a child is found working. This includes awareness trainings for all employees and contractors, schools should encourage and motivate children to attend school, parents to be advised and warned verbally on the spot not to allow children to assist them, and the child sent home or to an appropriate child care facility. The prohibition against child labour is included in all service contracts and supplier agreements. All contracts entered into with third parties contain a clause which states that the contractor shall ensure no minors (below 18 years old) are employed. Clause 10 of the contracts contain a provision that the contractor shall comply with the provisions of the relevant Acts, regulations and by-laws, including Employment of Children and Young Persons (Employment) Act 1966.
	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	Based on documentation review (master checkroll, personal files containing copies of passport, KTP or Malaysian IC), interviews conducted and observations in the field, all employees were above the age of 18 when they commenced work at Sri Kamusan CU. Evidence is available that minimum age requirements are met. Documented age screening procedure is available from copies of passport and Malaysian NRIC, and

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
	There is a documented age screening verification procedure.		copies of Indonesian workers' identity card known as KTP.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	Yes	There was no evidence that the estates and the mill at Sri Kamusan CU employ anyone below the age of 18 years. Auditor also verify through the contractors in the CU's and confirmed there is no Contractor workers available in the estate and mill. This was verified by examining the master lists, personal file, contracts and payslip of each operating unit where details of the workers' IC numbers and dates of birth are available. Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed.
	6.4.4 The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	Yes	Communication of Wilmar's Child Protection Policy dated January 2018 which states that the company does not tolerate child labour, any forms of child exploitation and child abuse was given to external stakeholders during stakeholder meetings, Policy briefings to workers, and during induction trainings for new workers.
6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.	6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	Yes	A Policy against sexual harassment has been established. This Policy is used to guide procedures to be taken in the event of sexual harassment incident and communicated to all staffs and workers during morning muster and via the Women and Children Committee meetings. Interviews held with workers (male, female, local, foreign) confirmed their understanding of this Policy.
	6.5.2 (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	Yes	A Policy to protect reproductive rights of all, especially women is implemented. This Policy gives the employees the right to decide freely and responsibly of their planning to have children, and to make decisions concerning reproduction free of discrimination, coercion and violence.
	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	Gender committee is in place as a channel where expecting mothers and new mothers are consulted and advised on actions to be taken including discussion with the management on reassigning them to work that has risk and hazard during their pregnancy and breast-feeding period. Interview with workers and GCC chairperson confirmed that mothers are given the rights to breast feed, seek for rest during work hours (if required) and assigned to task that is not imposed any hazard to them. Records of the needs of new mothers' assessments available.
	6.5.4 A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the	Yes	The Sri Kamusan CU has an SOP entitled 'Anti Sexual Harassment'. This SOP provides a reporting form called the 'Grievance/Complaint Form for Sexual Harassment' which could be used by complainants to lodge a report. This SOP is also accompanied by a flowchart. The flowchart was displayed at all units within Sri Kamusan CU. The SOP also contains the complaint and investigation procedure to handle sexual harassment in the workplace. This SOP were communicated to all staffs and workers



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Clause	Indicators	Comply Yes/No	Findings
	workforce.		during morning muster and gender committee.
6.6 No forms of forced or trafficked labour are used.	6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited: <ul style="list-style-type: none"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty to the workers for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>	Yes	All workers in Sri Kamusan CU in Estate and Mill have entered into employment voluntarily, it was verifying during the interview with Indonesian and local workers. The workers know they will work in Oil Palm Sector since from their country. The mill and all visited estates have given back passport to foreign workers as verified during interviewed with the workers. However, the foreign workers request the office to keep their passport due to safety reason without any force from Sri Kamusan Management as verified through 'Consent for Passport Safekeeping'. Foreign workers also are freely to take back their passport after filling in ' <i>Borang Pengambilan Passport</i> '. All the passport are stored in the safe locker in estates and mill offices with name of worker, passport number. Workers also confirmed there is no involuntary overtime as they will work for overtime if management ask to, they also understand their contract which was saying that they can resign from the company with 8 weeks of notice and they also don't have debt of bondage.
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	Yes	There is a special labour policy and procedures established known as "Recruitment of Workers". This document spells out the recruitment process from: <ol style="list-style-type: none"> <li>Manpower planning – applying for quota, appointment of recruitment agent, sourcing of workers, workers interviews, satisfaction of employability criteria, shortlisting.</li> <li>Recruitment process – registration onto the approved Employee Master list and uploaded onto the SAP system.</li> <li>Orientation – briefing on language, safety procedures, labour laws, culture practices, surrounding community, housing, medical, amenities, issuance of PPE.</li> <li>Commencement of work – no discrimination, no contract substitution practices, post-arrival orientation programme and provision of decent living conditions.</li> </ol>
6.7 The unit of certification ensures that the working environment under its control is safe and without undue risk to	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	Yes	Estate(s) and Mill Managers were appointed as responsible person(s) for safety and health issues and also chairman for OSH Committee. The Manager subsequently assigned duties of OSH coordinator to the Assistants or medical assistant for the down line implementation of OSH practices in the estate and mill. 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. Occupational Safety Health

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Clause	Indicators	Comply Yes/No	Findings
health.	issues raised are recorded.		<p>(OSH) Committee has been established together.</p> <p>The OSH committee organization chart for 2022 was available. The Estate/Mill Manager is the chairman and the Mill Engineer/Assistant Manager is the secretary. OSH Committee meetings confirmed that among the agenda discussed, included the following:</p> <ul style="list-style-type: none"> <li>▪ Passing of previous minutes and arising matters.</li> <li>▪ Accident report (Monthly Data of Mill/Estate Safety Performance)</li> <li>▪ Workplace inspection</li> <li>▪ Safety report and programme</li> <li>▪ HIRARC review</li> <li>▪ Training programme status</li> <li>▪ PPE stock status and PPE inspection</li> <li>▪ First aid boxes inspection</li> </ul> <p>OSH Committee meetings were held once in three months.</p>
	6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.	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. Among of procedure of ERP Document, such as:</p> <ul style="list-style-type: none"> <li>▪ 3.0 Bund break</li> <li>▪ 4.0 Suicide attempts and prevention</li> <li>▪ 5.0 Bushfire</li> <li>▪ 6.0 Fire breakout in mill</li> <li>▪ 7.0 Chemical spillage</li> <li>▪ 8.0 Flood</li> <li>▪ 9.0 Injury and illness</li> <li>▪ 10.0 Poisoning</li> <li>▪ 11.0 Workplace violence</li> <li>▪ 12.0 Boiler shutdown</li> <li>▪ 13.0 CPO pipe burst &amp; fire</li> <li>▪ 14.0 Exhaust chamber explosion</li> <li>▪ 15.0 Pipe leak</li> <li>▪ 16.0 Earthquake</li> <li>▪ 17.0 Biogas</li> <li>▪ Covid 19 Emergency Preparedness and Response Guideline</li> </ul> <p>First aid training was conducted at mill and estates annually. The records of the training refer indicator 3.7.2. First Aid boxes were available at work operations in the field in all estates and mill. Telephone numbers and names of the members of the Emergency</p>

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Clause	Indicators	Comply Yes/No	Findings
			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. Accident statistics were being maintained in a satisfactory manner and periodically reviewed. Accident/injury record were recorded using Lost Time Accident during fiscal monthly basis. Quarterly review on accident cases had been carried out during quarterly OSH committee meeting.
	6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all 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 were continuously trained and random interviews conducted showed that they had understood the hazards involved and the usage and handling of chemicals in a safe manner. 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.
	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	Local & Foreign workers are covered by SOCSO ( <i>Pertubuhan Keselamatan Sosial</i> ).
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	Yes	Properly recorded and reviewed onsite.

### **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	7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control.	Yes	All Estates sampled was implementing IPM as per Wilmar International Limited Agriculture Manual & Standard Operating Procedure for Oil Palm 3/2011 -Chapter 8 -Plant protection – Pest and disease management for the various field operations. In order to minimize the use of pesticides, all Estates had planted beneficial plants, mainly <i>Tunera subulata</i> , and some <i>Antigonon leptopus</i> with maps indicating areas planted.

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<b>Clause</b>	<b>Indicators</b>	<b>Comply Yes/No</b>	<b>Findings</b>
are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			All Estates had in place documented IPM plans which covered Monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides.
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	Yes	Species referenced in the Global Invasive Species Database and CABI.org. were not used in managed areas of all estates.
	7.1.3 There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	Yes	All Estates was using Wilmar International Limited policy of no open burning. As advocated, the estates practiced Zero burning, thus no use of fire for pest control had been practiced. Furthermore, there had been no out breaks of Pest attack.
7.2 Pesticides are used in ways that do not endanger health of workers, families, 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. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.
	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	Sri Kamusan CU has a record of areas where pesticides had been used. Pesticides are used only when justified and areas used are recorded in store issue chits, bin cards, program sheets, SAP System (System Applications and Products in Data Processing), costing records and progress reports. Records of pesticides used by area, quantity used, hectares applied in 2020, 2021, and 2022 were available.
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	Yes	The estates as per the IPM plan has manage pests, other than weeds, at below threshold levels. No prophylactic spraying had been carried in all estates. The estates in order to minimise pesticide usage, do not carry out calendar baiting of rats. Rat baiting was only done as and when required and only in areas where census showed fresh damage above threshold level of 5%. Furthermore, in order to minimise the use of weedicide only spraying of circle and paths had been carried. Spraying is only carried as per program. Weeds in the inter rows are mainly slashed with minimum spraying. No chemicals were used for VOP control. The VOPs were manually removed. Slashing woody growths, weeds and manual removal of VOPs was witnessed by auditors.
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	Yes	There was no evidence of any prophylactic use of pesticides in Oil Palm planted areas. All Estates had complied with the requirement as per Chapter 8 of Wilmar International Limited Agriculture Manual & Standard Operating Procedure for Oil Palm 3/2011. As per Chapter 8, prophylactic use of pesticides was only in the Oil Palm Nursery and only for Fungicides and not for any other pesticide.
	7.2.5 Pesticides that are categorised as	Yes	During the audit, it was noted that all Estates had not use chemicals categorized as World

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Clause	Indicators	Comply Yes/No	Findings
	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:		Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions. All the pesticides used were those registered under the Pesticides Act 1974 (Act 149). The list of approved pesticides was available for reference. The list, entitled " <i>Senarai Racun Makhluk Perosak Berdaftar</i> " was sourced from Department of Agriculture Official Website <a href="http://www.doa.gov.my/web/guest/senarai_racun_perosak_berdaftar">http://www.doa.gov.my/web/guest/senarai_racun_perosak_berdaftar</a> . Except for Amine and Cypermethin which were Class II chemicals, all others were of Class III & IV.
	7.2.5a Judgment of the threat and verify why this is a major threat.	Yes	Not applicable - As mentioned above in Indicator 7.2.5. of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat had been used. Hence, the need for a judgment of the threat does not apply on the Sri Kamusan CU.
	7.2.5b Why there is no other alternative which can be used.	Yes	Not applicable - As mentioned above in Indicator 7.2.5. of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat had been used. Hence, the need for other alternatives is not required on Sri Kamusan CU.
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	Yes	Not applicable - As mentioned above in Indicator 7.2.5. of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat had been used. Hence, the need for a judgment of the threat does not apply on the Sri Kamusan CU.
	7.2.5d What is the process to limit the negative impacts of the application.	Yes	Not applicable - As mentioned above in Indicator 7.2.5. of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat had been used. Hence, the need for other alternatives is not required on Sri Kamusan CU.
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	Yes	Not applicable - As mentioned above in Indicator 7.2.5. of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat had been used. Hence, the need for a judgment of the threat does not apply on the Sri Kamusan CU.
	7.2.6 (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	Yes	The estate and mill have the SOP for handling of chemical/pesticides. The employees involved in the chemical handling such as the storekeepers, lab operators, sprayers, fertilizer and P&D workers were trained in chemical handling, and they understood the hazards of the chemicals and how the chemicals should be used in a safe manner. Appropriate safety and application equipment had been provided and used as per the

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Clause	Indicators	Comply Yes/No	Findings
	products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.		CHRA. The trade and generic names of the chemicals were made known to them through the SDS training. It was also noted that SDS are available at chemical and fertilizers during the audit. Training on pesticides/chemical handling was carried out regularly by the CU for knowledge about the activities.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	Yes	Pesticides selected for use were those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with OSH USECHH Regulations (2000). At all visited mill and estates the storage of pesticides was in accordance with recognized best practices. They were stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders and Pesticides Act 1974 (Act 149) and Regulations. All information regarding the chemicals affixed as product label and the accompanying Safety Data Sheet (see OHS CLASS 2013 Regulations) with details of its usage, hazards, trade and generic names were found available in Bahasa Malaysia language understood by workers or explained carefully to them by a plantation management official at operating unit level. A proper premixing area with eye wash facilities and bathing area is available near to the chemical stores. The wastewater from the washing of empty chemical containers and PPE, and chemical mixing was pumped to a storage tank for reuse in chemical mixing. This is to avoid any contamination of chemicals to the ground. Triple rinsing activities continued to be implemented for empty pesticide containers. The detailed procedure for this purpose is available in SOP for Scheduled Wastes Management and SOP for Triple Rinsing.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	Yes	Empty pesticide containers were punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. Inventory and consignment documents verified for confirmation of proper management and disposal. The scheduled wastes generated at Sri Kamusan CU not more than 180 days @ 20mt.
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	Yes	There was no aerial spraying has been practiced in the Sri Kamusan CU. This was also confirmed by interviewed workers and management.
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and	Yes	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.

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Clause	Indicators	Comply Yes/No	Findings												
	documented action to treat related health conditions, is demonstrated.														
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	Yes	Pregnant and breast-feeding women are not allowed to work with Pesticides & Hazardous Chemicals. All estates and mill visited complied with this requirement as mentioned in the SSOP No.3 Item 3.4.2 " <i>Penyemburan Racun Rumpai</i> ". The Medical Assistant (MA) conducted the check and determine whether female workers are pregnant. The check was carried out on monthly basis.												
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	Yes	The organization had established Waste Management Plan with latest reviewed on 18 <sup>th</sup> January 2022. Among the type of waste and waste handling been determined were: <table border="1" data-bbox="1070 608 2040 783"> <thead> <tr> <th>Type of waste</th> <th>Waste handling</th> </tr> </thead> <tbody> <tr> <td>Empty agrochemical container</td> <td>Triple rinsing and dispose to recycling centre</td> </tr> <tr> <td>Domestic waste</td> <td>Landfill</td> </tr> <tr> <td>Scheduled waste</td> <td>Disposed to licensed SW collector</td> </tr> <tr> <td>Contractor Scheduled waste</td> <td>Disposed by respective estates</td> </tr> <tr> <td>Medical waste</td> <td>Disposed by SW collector</td> </tr> </tbody> </table>	Type of waste	Waste handling	Empty agrochemical container	Triple rinsing and dispose to recycling centre	Domestic waste	Landfill	Scheduled waste	Disposed to licensed SW collector	Contractor Scheduled waste	Disposed by respective estates	Medical waste	Disposed by SW collector
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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 and maintained.													
7.3.3 The unit of certification does not use open fire for waste disposal.	Yes	The organization had disposed domestic waste in the landfill, Site visit at relevant landfill as per below location sighted the landfill are well maintained. <table border="1" data-bbox="1070 967 2040 1091"> <thead> <tr> <th>Estate</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td>SI &amp; SS</td> <td>PM 2004 Block 20</td> </tr> <tr> <td>H2 &amp; Jebawang</td> <td>PM 2005 Block 21</td> </tr> <tr> <td>Hibumas 1</td> <td>Parcel 14/17 Block 026</td> </tr> </tbody> </table>	Estate	Location	SI & SS	PM 2004 Block 20	H2 & Jebawang	PM 2005 Block 21	Hibumas 1	Parcel 14/17 Block 026					
Estate	Location														
SI & SS	PM 2004 Block 20														
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Hibumas 1	Parcel 14/17 Block 026														
7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level that ensures optimal and sustained yield.	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	Yes	Fertiliser application was of paramount importance for maintenance of soil fertility and the estates continued to apply fertilisers as per EMU recommendations made by Head of R&D Department. In addition, all Estates have managed soil fertility as per the SOPs in the Wilmar International Limited Agriculture Manual & Standard Operating Procedure for Oil Palm 3/2011, Chapter 4, 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, Leguminuos cover crops, and <i>Nephrolepis biserrata</i> in the interline. Annual Fertiliser recommendations are made based on annual foliar sampling.												
	7.4.2 Periodic tissue and soil sampling is	Yes	From the Agronomist/Head R&D reports it was established that the estates continued to												

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Clause	Indicators	Comply Yes/No	Findings																																																																								
	carried out to monitor and manage changes in soil fertility and plant health.		carry out periodic foliar and soil sampling to monitor changes in nutrient status. Annual foliar sampling, as per the SOP of EMU, for the nutrients N, P, K, Mg, Ca & B had been carried out in all estates by Borneo Samudera Sdn Bhd and the results formed the basis for the fertiliser recommendations to maintain and to improve soil fertility.																																																																								
	7.4.3 A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	Yes	All sampled estates had a nutrient recycling strategy in place. Palm fronds were stacked in the fields to decompose and by EFB applications. Due to distance from the mill and having only matured Oil Palm only a limited amount of EFB application was programmed for Hibumas 1 Estate, no application for Jebawang Estate and Sapi Sugut Estate. The bulk of EFB was applied on Sri Kamusan Estate.																																																																								
	7.4.4 Records of fertiliser inputs are maintained.	Yes	Records of programs and applications of fertilisers were made available to auditors. Records showed that the main fertilisers applied in 2021 were NPK, GML, Prod and NK2. Records sighted showed that actual applied in 2021 was delayed related to covid 19 issues & weather.																																																																								
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	<p>Maps identifying marginal and fragile soils, including steep terrain, were available on all 4 Estates visited. There were no marginal and fragile soils in the CU. The soil series is as per table below:</p> <table border="1"> <thead> <tr> <th>Sri Kamusan Estate</th> <th>Hibumas 1 Estate</th> <th>Jebawang Estate / Hibumas 2 Estate</th> <th>Sapi Sugut / Sekar imej Estate</th> </tr> </thead> <tbody> <tr> <td>Gong Chenak</td> <td>Bukit Tuku</td> <td>Bukit Tuku</td> <td>Cherang Hangus</td> </tr> <tr> <td>Kampung Pusu</td> <td>Chat,</td> <td>Cherang Hangus</td> <td>Lunas</td> </tr> <tr> <td>Kumansi</td> <td>Cherang Hangus</td> <td>Kechor</td> <td>Musang</td> </tr> <tr> <td>Lunas</td> <td>Gali</td> <td>Rasau</td> <td>Nangka</td> </tr> <tr> <td>Rasau</td> <td>Gong Chenak</td> <td>Stom</td> <td>Stom</td> </tr> <tr> <td>Stom</td> <td>Kampung Pusu</td> <td>Tangong Lipat</td> <td>Tanjong Lipat</td> </tr> <tr> <td>Talisai</td> <td>Kechor,</td> <td></td> <td>Tebok</td> </tr> <tr> <td>Tanjong Lipat</td> <td>Laka</td> <td></td> <td></td> </tr> <tr> <td>Unclassified</td> <td>Local Alluvial Complex</td> <td></td> <td></td> </tr> <tr> <td></td> <td>Lunas</td> <td></td> <td></td> </tr> <tr> <td></td> <td>Musang</td> <td></td> <td></td> </tr> <tr> <td></td> <td>Parit Botak</td> <td></td> <td></td> </tr> <tr> <td></td> <td>Rasau</td> <td></td> <td></td> </tr> <tr> <td></td> <td>Stom</td> <td></td> <td></td> </tr> <tr> <td></td> <td>Talisai</td> <td></td> <td></td> </tr> <tr> <td></td> <td>Tanjong Lipat</td> <td></td> <td></td> </tr> <tr> <td></td> <td>Unclassified</td> <td></td> <td></td> </tr> </tbody> </table>	Sri Kamusan Estate	Hibumas 1 Estate	Jebawang Estate / Hibumas 2 Estate	Sapi Sugut / Sekar imej Estate	Gong Chenak	Bukit Tuku	Bukit Tuku	Cherang Hangus	Kampung Pusu	Chat,	Cherang Hangus	Lunas	Kumansi	Cherang Hangus	Kechor	Musang	Lunas	Gali	Rasau	Nangka	Rasau	Gong Chenak	Stom	Stom	Stom	Kampung Pusu	Tangong Lipat	Tanjong Lipat	Talisai	Kechor,		Tebok	Tanjong Lipat	Laka			Unclassified	Local Alluvial Complex				Lunas				Musang				Parit Botak				Rasau				Stom				Talisai				Tanjong Lipat				Unclassified		
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	7.5.2 No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	Yes	<p>Wilmar International Limited had a management strategy for planting on slopes to minimise and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by:</p> <ul style="list-style-type: none"> <li>• Stated in the EIA report. <i>“Sebarang aktiviti pemajuan ladang kelapa sawit atau aktiviti pembersihan kawasan tidak dibenarkan di Kawasan berkecerunan 25 darjah atau lebih”</i>.</li> <li>• Item 2 of Chapter 3 in the Wilmar International Limited Agriculture Manual &amp; Standard Operating Procedure for Oil Palm 3/2011 -Land clearing and preparation “All steep areas with more than 25° and larger than 20 ha should not be cleared for development”.</li> </ul>
	7.5.3 There is no new planting of oil palm on steep terrain.	Yes	<p>Sri Kamusan CU had a management strategy for planting on slopes to minimise and control erosion and degradation of soils. It was observed that there is no new planting of oil palm on steep terrain. Furthermore, auditors have verified through checking the <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a>, Google Maps, Estate Maps and also through site visit to all four estates. Based on the audit findings, it is confirmed that there was no new planting in Sri Kamusan CU.</p>
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	<p>As per all Wilmar International Limited Estates, to demonstrate the long-term suitability of land for palm oil cultivation, Sri Kamusan CU have conducted soil surveys identifying marginal and fragile soils, and terrain surveys including steep terrain.</p>
	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	<p>As mentioned in Indicator 7.5.1, there were no marginal and fragile soils in all estates visited.</p>
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	Yes	<p>The management of all Estates visited in Sri Kamusan CU continued to use Soil surveys and topographic information guide in the planning of drainage and irrigation systems, roads and other infrastructure. As mentioned in Indicator 7.5.1 maps identifying marginal and fragile soils, including steep terrain, were prepared by EMU Mapping Department.</p>
7.7 No new planting on peat, regardless of depth after 15 November 2018 and	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	Yes	<p>Auditors have verified through checking the <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a>, Google Maps, Estate Maps and also through site visit to all four estates. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at Sri Kamusan CU</p>

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Clause	Indicators	Comply Yes/No	Findings
all peatlands are managed responsibly.			Furthermore, as per the soil maps prepared by EMU and site visits there are no peat soils on all estates.
	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).	Yes	It was confirmed from the peat inventory submitted to the RSPO and site visits, all Estates visited in Sri Kamusan CU do not have any peat soil. There also was supported by the soil maps prepared by EMU.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	Yes	It was confirmed from the peat inventory submitted to the RSPO and site visits, the all Estates visited in Sri Kamusan CU do not have any peat soil. There also was supported by the soil maps prepared by EMU.
	7.7.4 (C) A documented water and ground cover management programme is in place.	Yes	It was confirmed from the peat inventory submitted to the RSPO and site visits, the all Estates visited in Sri Kamusan CU do not have any peat soil. There also was supported by the soil maps prepared by EMU.
	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within	Yes	It was confirmed from the peat inventory submitted to the RSPO and site visits, the all Estates visited in Sri Kamusan CU do not have any peat soil. There also was supported by the soil maps prepared by EMU.

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	12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.		
	7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	Yes	It was confirmed from the peat inventory submitted to the RSPO and site visits, all Estates visited in Sri Kamusan CU do not have any peat soil. There also was supported by the soil maps prepared by EMU.
	7.7.7 (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	It was confirmed from the peat inventory submitted to the RSPO and site visits, all Estates visited in Sri Kamusan CU do not have any peat soil. There also was supported by the soil maps prepared by EMU.
7.8 Practices maintain the quality and availability of surface and groundwater.	7.8.1 A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:	Yes	<p>Water management plan was available. Documented Water Management Plan Year 2021 inclusive of location; wastewaters produced; treatment/containment method; reuse/recycle/disposal method was sighted. The plan implemented as per following:</p> <ul style="list-style-type: none"> <li>- Identification of water sources</li> <li>- Efficient use of water</li> <li>- Renewability of water sources</li> <li>- Riparian buffer zone</li> <li>- Areas where buffer zone not established</li> <li>- Water quality monitoring</li> <li>- Effluent analysis</li> <li>- Demarcation of wetlands areas</li> <li>- Soil and water conservation measures</li> <li>- No construction of bunds/weirs/dam across main rivers</li> </ul> <p>Sri Kamusan CU also maintained monitoring records of water usage which recorded every</p>

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			day and fertilizer on monthly basis including the monitoring of rainfall water, which has been an alternative source of water as mitigation plan during draught season.
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	Yes	The continued availability of water sources and to avoid negative impacts on other users in the catchment has been conclude in the Environmental Compliance Report (ECR). ECR was conducted by Ekohandal Sdn. Bhd. The ECR assessment was carried one every 4 months.
	7.8.1b Workers have adequate access to clean water.	Yes	The organization had generated own treated water before been supplied to workers, based on guidelines WHO drinking water parameters.
	7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).	Yes	The estates have protected the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SOP Riparian, Floodplain & Water Bodies Management with revision dated December 2020 to maintain the buffer by restricting agrochemicals application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The signboards were displayed accordingly at the site where applicable. During the field visit at Sri Kamusan / Hibumas 1 / Jebawang / Sapi Sugut Estate there was no spraying activities, EFB application or signs left in such an area.
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.	Yes	The organization had analyse effluent treatment water which had been conducted by 3 <sup>rd</sup> party lab and been reported thru quarterly report.
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	Yes	The water usage for Sri Kamusan CU monitored and recorded appropriately.
7.9 Efficiency of fossil fuel use and the use of renewable energy is optimised.	7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented.	Yes	The plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented. Record on energy consumption for both renewable and non-renewable sources were kept and documented by monthly basis compare with yearly baseline. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. Among the plan for improving fossil fuel are: <ul style="list-style-type: none"> <li>▪ Closely monitored operation of tractors</li> <li>▪ Minimise the electricity usage at workers housing</li> <li>▪ Replace light bulb with energy saving bulb</li> <li>▪ To switch off and unplug all the electrical equipment after used</li> <li>▪ Minimise the lubricant oil usage through using small tractor for FFB evacuation</li> </ul>
7.10 Plans to reduce	7.10.1 (C) GHG emissions are identified and assessed for the unit of certification.	Yes	The CU had used RSPO Palm GHG version 4.0 Calculator as a tool to calculate the GHG emissions. Sighted report sends to RSPO on 23/02/2022. The input data was verified, and

**RSPO PUBLIC SUMMARY REPORT**

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pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.	Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.		<p>the following were determined:</p> <table border="1" data-bbox="1070 352 1984 472"> <thead> <tr> <th>Description</th> <th>tCO<sub>2</sub>e/t Product</th> <th>Production</th> <th>t/yr</th> </tr> </thead> <tbody> <tr> <td>CPO</td> <td>0.39</td> <td>FFB Processed</td> <td>345113.60</td> </tr> <tr> <td>PK</td> <td>0.39</td> <td>CPO Processed</td> <td>71594.123</td> </tr> </tbody> </table> <table border="1" data-bbox="1070 499 1713 707"> <thead> <tr> <th>Land Use</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>OP Planted Area on Mineral Soil</td> <td>8048.85</td> </tr> <tr> <td>OP Planted on Peat</td> <td>0.00</td> </tr> <tr> <td>Conservation (forested)</td> <td>5104.67</td> </tr> <tr> <td>Conservation (non-forested)</td> <td>31.19</td> </tr> </tbody> </table> <p>Milling extraction rate:</p> <table border="1" data-bbox="1070 762 2042 807"> <tbody> <tr> <td>OER</td> <td>20.26</td> <td>KER</td> <td>4.24</td> </tr> </tbody> </table> <p>Mill Emission</p> <table border="1" data-bbox="1070 863 1886 1160"> <thead> <tr> <th colspan="3">Own Crop</th> </tr> <tr> <th>Emission source</th> <th>tCO<sub>2</sub>e</th> <th>tCO<sub>2</sub>e/tFFB</th> </tr> </thead> <tbody> <tr> <td>POME</td> <td>5035.81</td> <td>0.02</td> </tr> <tr> <td>Fuel consumption</td> <td>585.06</td> <td>0.00</td> </tr> <tr> <td>Grid electricity utilisation</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td colspan="3"><b>Credits</b></td> </tr> <tr> <td>Export of excess electricity to housing &amp; grid</td> <td>-2144.81</td> <td>0.00</td> </tr> <tr> <td>Sale of PKS</td> <td>-10840.43</td> <td>-0.05</td> </tr> <tr> <td>Sale of EFB</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td><b>Total</b></td> <td><b>-7364.36</b></td> <td><b>-0.02</b></td> </tr> </tbody> </table> <p>Plantation / field emission</p> <table border="1" data-bbox="1070 1214 2042 1361"> <thead> <tr> <th colspan="4">Own Crop</th> </tr> <tr> <th>Emission sources</th> <th>tCO<sub>2</sub>e</th> <th>tCO<sub>2</sub>e/ha</th> <th>tCO<sub>2</sub>e/FFB</th> </tr> </thead> <tbody> <tr> <td>Land Conversion</td> <td>66230.79</td> <td>8.23</td> <td>0.75</td> </tr> <tr> <td>*CO<sub>2</sub> Emissions from Fertiliser</td> <td>2343.05</td> <td>0.29</td> <td>0.03</td> </tr> <tr> <td>**N<sub>2</sub>O Emissions from Fertiliser</td> <td>1058.01</td> <td>0.13</td> <td>0.01</td> </tr> </tbody> </table>	Description	tCO <sub>2</sub> e/t Product	Production	t/yr	CPO	0.39	FFB Processed	345113.60	PK	0.39	CPO Processed	71594.123	Land Use	Ha	OP Planted Area on Mineral Soil	8048.85	OP Planted on Peat	0.00	Conservation (forested)	5104.67	Conservation (non-forested)	31.19	OER	20.26	KER	4.24	Own Crop			Emission source	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB	POME	5035.81	0.02	Fuel consumption	585.06	0.00	Grid electricity utilisation	0.00	0.00	<b>Credits</b>			Export of excess electricity to housing & grid	-2144.81	0.00	Sale of PKS	-10840.43	-0.05	Sale of EFB	0.00	0.00	<b>Total</b>	<b>-7364.36</b>	<b>-0.02</b>	Own Crop				Emission sources	tCO <sub>2</sub> e	tCO <sub>2</sub> e/ha	tCO <sub>2</sub> e/FFB	Land Conversion	66230.79	8.23	0.75	*CO <sub>2</sub> Emissions from Fertiliser	2343.05	0.29	0.03	**N <sub>2</sub> O Emissions from Fertiliser	1058.01	0.13	0.01
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			Fuel Consumption	2861.89	0.36	0.03
			Peat Oxidation	0.00	0.00	0.00
			<b>Sinks</b>			
			Crop Sequestration	-54978.74	-6.83	-0.62
			Conservation Sequestration	-25439.70	-3.16	-0.29
			<b>Total</b>	<b>-7924.70</b>	<b>-0.98</b>	<b>-0.09</b>
			Palm Oil Mill Effluent (POME) Treatment			
			Diverted to compost	0%		
			Diverted to anaerobic digestion	100%		
			Diverted to Anaerobic Digestion			
			Diverted to anaerobic pond	0.0%		
			Diverted to methane capture (flaring)	29.00%		
			Diverted to methane capture (electricity generation)	71.00%		
	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).	Yes	Auditor has verified through checking the <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , Google Maps, Estate Maps and also through site visit to the sampled estates areas. Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at Sri Kamusan CU. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.			
	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	Yes	The organization had established wastes and pollution mitigation and improvement plan.			
			<b>Pollution</b>	<b>Mitigation</b>	<b>Monitoring</b>	
			Usage of fertilizer and Agrochemical	Refer and apply for SOP and SSOP for manuring and spraying.	QAMS inspection report	
			Usage of Diesel	Maintenance of vehicle regularly	Diesel consumption record	
			Contaminated soil and sand with oils or chemical	Disposed as per SSOP and SOP,	SW inventory records	

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			<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:33%; text-align: center;">Triple rinsing area</td> <td style="width:33%; text-align: center;">Used chemical container</td> <td style="width:33%; text-align: center;">Triple rinsing record</td> </tr> <tr> <td colspan="3">Sighted during site visit, the organization had well implemented and monitored the program on prevention plan.</td> </tr> </table>	Triple rinsing area	Used chemical container	Triple rinsing record	Sighted during site visit, the organization had well implemented and monitored the program on prevention plan.		
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7.11 Fire is not used for preparing land and is prevented in the managed area.	7.11.1 (C) Land for new planting or replanting is not prepared by burning.	Yes	Wilmar International Limited had a policy that Fire is not used for preparing land: it was in their No Deforestation, No Exploitation Policy" which was updated in November 2019 and signed by its Chairman & Chief Executive Officer. In addition, Wilmar International Limited had a Green Stacking Policy under Item 4, Part 1, Chapter 3 of the Wilmar International Limited, Agriculture Manual & SOP for Oil Palm 3/2011. All 4 estates had complied to the policy as there was no evidence that fire had been used to prepare land for replanting in all estates. The was no replanting and replants in all 4 Estates at time of audit.						
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	Yes	Sri Kamusan CU had established fire prevention and control measures for the areas under its direct management. In the mill there were water hydrants and valid fire extinguishers at the various operating stations. All 4 estates had valid fire extinguishers at the office, employee quarters, chemical & fertilizer stores, diesel skid tank, etc.						
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	Yes	Sri Kamusan CU engages with adjacent stakeholders on fire prevention and control measures through stakeholder meetings which had been conducted in Feb 2022.						
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.	7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	Yes	Not Applicable as there was no new land clearing in the 4 Estates, but there is a RaCP process which is voluntarily declare by Sri Kamusan CU. The RaCP report/Plan covers two Estate, Namely Hibumas 2 Sdn Bhd and Sekar Imej Sdn Bhd where a total 10.55ha Riparian and 58.54ha of Steep area, which already identified and reviewed by the RSPO, will have completed remedial actions by Year 2025. The LUCA review also has identified conservation liability of 107.07ha which was derived from Sekar Imej Estate under Sekar Imej Sdn Bhd. Sri Kamusan CU has Proposed to compensate land with total of 120.67Ha within the Sekar Imej Concession which Located in Sugut Sabah, Malaysia. RSPO has approved and endorsed the proposal under Annex 7 on 12 May 2021 and further approve of annex 8 on 27 July 2021, detail of the Assessment can be found in the report Annex 8: Hibumas 2 and Sekar Imej Estate Remediation & Compensation Plan. The latest Plan has been updated under Sekar Imej Estate Summary Compensation Plan dated August 2021. This Plan will be updated to RSPO on 6 Month Basis.						
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	Yes	The High Conservation Value Assessment Report dated September 2010, had identified the HCV sites for each of all the six estates. A public consultation was held in June 2010 where 8 members of the local communities were represented in the meeting to discuss the findings in the report. An Action Plan for HCV Report was also prepared.						
	7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the	Yes	HCV re-assessment removed and included some area has been done in May 2015 by same assessor which was Malaysia Environmental Consultants Sdn Bhd, and						

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Clause	Indicators	Comply Yes/No	Findings
	current HCV assessment of those plantations remains valid.		recommended that the total HCV area was the same, however, some area has removed status as only conservation area.
	7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.	Yes	Areas within each of the estate were identified for protection of their high conservation values. Sites with external HCV1, HCV3 and HCV4 had also been identified. There were no RTE species found in Sri Kamusan CU during the assessments. Maps demarcating these HCV areas had also been prepared. The audit team had inspected the sites protected in the Hibumas 1 Estate, Hibumas 2 Estate, Sri Kamusan Estate, Jebawang Estate, Sapi Sugut Estate and Sekar Imej Estate. Noted that signage had been erected in all these HCV sites indicating the classes and that no activity was permitted in these areas. The total area for HCV in the Sri Kamusan CU was 5,141.11 ha (newly revised with reason as explained in the body text of the report). There was no new land clearing (in existing plantations or new plantings) in the CU.
	7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).	Yes	During this ASA 1 audit (2022), it was found the "Review & Summary HCV Management and Action Plan (2019-2020)" was amended to HCV Management and Action Plan (2021-2025). An effort has been made by the Sri Kamusan CU to identify, protect and/or enhance forest connectivity in CU including new project of "Sekar Imej Conservation Area project". Sri Kamusan CU has identified significant stakeholders. i.e., HUTAN (NGO), Sabah Wildlife Department, SEARRP, Sabah Forestry Department (Forest Research Centre Department) and others. Sighted the Conservation Stakeholder meeting has been held on 25 May 2021 with participation of HUTAN (NGO), Sabah Wildlife Department, SEARRP, Sabah Forestry Department (Forest Research Centre Department) and etc, And surrounding stakeholders, to identify and meeting regarding the HCV, and Biodiversity Plan. As of the Minutes meeting there is no changes and all participants agreed with the Sri Kamusan's HCV Management and Action Plan (2021-2025).
	7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and	Yes	Not applicable since there was no new land clearing and no rights of local communities have been identified in HCV areas in Sri Kamusan CU.



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Clause	Indicators	Comply Yes/No	Findings
	management of these conservation areas.		
	7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	Yes	All rare, threatened or endangered (RTE) species are protected, even though they are not identified in an HCV assessment in 2010. A programme to regularly educate the workforce about the status of RTE species was place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.
	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	Records on monthly monitoring was verified during the audit. The outcomes of the HCV monitoring have been fed back into the management plan as verify through Summary HCV Monitoring Finding in 2021. Observed that signage had been erected at each estate to ban hunting. The entrances to each estate had gates and guarded by the security staffs. Regular patrols had been conducted and reported on the protection of these HCV sites. The staff and workers were also consulted on this, and they were aware of the responsibility to protect endangered, rare and threatened species of forest flora and fauna in their areas. There were also posters put up at all estates offices.
	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	There are no HCV set-asides with existing rights of local communities at Sapi Sugut, Sekar Imej, Jebawang and Hibumas 2 Estate. Therefore, this indicator was not applicable.

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Clause	Indicators		Comply Yes/No	Findings
<p>5.5.2 Time-bound plan</p> <p>A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.</p>	(a)	As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.	Yes	Details are available as per the following attachments relating to Time Bound Plan of Wilmar International Plantation as at January 2022. a) TBP WIP - RSPO Certification Status for Malaysia Operations b) TBP WIP - RSPO Certification Status for Indonesia Operations c) TBP WIP - RSPO Certification Status for Ghana /Nigeria Operations
	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	Yes	Details of the Time Bound Plan described as per attachment 6 updated as at January 2022
	(c)	Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);	Yes	Details of the Time Bound Plan described as per attachment 6 updated as at January 2022

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	(d)	Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised.	Yes	Details of the Time Bound Plan described as per attachment 6 updated as at January 2022
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 <sup>st</sup> January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	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><u>Indonesia Units</u></p> <ul style="list-style-type: none"> <li>- Pt. Agrindo Indah Perkasa on June 2018</li> <li>- Ksu Mutiara Bosa Sikilang on June 2018</li> <li>- Kud Damai Sejahtera on June 2018</li> <li>- Kud Kapar on June 2018</li> <li>- Koperasi Karya Makmur Pahirangan on February 2019</li> <li>- Koperasi Mamur Sejahtera on January 2019</li> <li>- Kud Permata Sawit Maligi on June 2018</li> <li>- Kud Rantau Pasaman Sasak on June 2018</li> <li>- Pt. Buluh Cawang Plantation on June 2018</li> <li>- Pt. Daya Landak Plantation on June 2018</li> <li>- Pt. Indoresin Putra Mandiri on June 2018</li> <li>- Pt. Putra Indotropical on June 2018</li> <li>- Pt. Pratama Prosentindo on June 2018</li> <li>- Pt. Agronusa Investama – PAHAUMAN on June 2018</li> <li>- Pt. Sarana Titian Permata Pom 2 on January 2019</li> <li>- Koperasi Tuah Jubata on February 2019</li> </ul> <p><u>Africa Units</u></p> <ul style="list-style-type: none"> <li>- Biase Plantation Limited (BPL) on February 2019</li> <li>- Eyop Industries Limited (EIL) on february 2019</li> </ul> <p><u>Malaysia Units</u></p> <ul style="list-style-type: none"> <li>- Jebawang Sdn Bhd – Laba Utama on April 2019</li> <li>- Suburmas Plantation Sdn Bhd on April 2019</li> </ul> <p>Evidences &amp; document reference such as HCV report results, land title, Racp status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc were concluded adequate in the report for all uncertified management</p>

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

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(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, Racc 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, Racc status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc. were concluded adequate in the report for all uncertified management units.
(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 5.5.3 (a) – (d) above by the audit team based on self-declarations only by the company,	Yes	<p>Wilmar International Limited (WIL) complied to all the requirement. There was no new planting within the properties in WIL. The Assessment of compliance to RSPO Partial Certification Requirements has been carried out for clause 5.5.3 (e)-(h) of certification system for units of the following i.e.</p> <ul style="list-style-type: none"> <li>a) Indonesia Units</li> <li>b) Africa Units</li> <li>c) Malaysia Units</li> </ul> <p>Evidences &amp; document reference such as HCV report results, land title, Racc 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>
	with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:		
	<ul style="list-style-type: none"> <li>• A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement;</li> </ul>	Yes	There was no non-compliance found for all requirements during this audit.
	<ul style="list-style-type: none"> <li>• Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.</li> </ul>	Yes	

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	<ul style="list-style-type: none"> <li>• Desktop study e.g. web check on relevant complaints</li> </ul>	Yes
	<ul style="list-style-type: none"> <li>• If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.</li> </ul>	Yes
(f)	For requirements 5.5.3 (a)-(d) above, the classification of critical and non-critical is as stated in the RSPO P&C. If a non-compliance against a critical indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless it is actively addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be available.	Yes
(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.	Yes

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<p>5.6.6</p> <p>The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p> <p>The CB shall have a mechanism in place to identify the interested parties and ensure a represented samples size of the interested parties are consulted in each audit.</p> <p>The CB shall keep track which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle.</p>	<p>No additional indicators</p>	<p>Yes</p>	<p>It has been verified that the land titles were for planting either oil palm or agricultural crops for economic value. It has been confirmed that Wilmar International Limited – Sri Kamusan Certification Unit has the right to use the land which was legitimately owned by their company. Evidence of legal ownership of the land including history of land tenure was verified during this audit. Each estate was provided with legal use of the land through a Country Lease signed by the Director of Lands and Surveys of Sabah following the payment of premium. It was also confirmed that there was no history of customary land tenure, recognised Native Customary Right (NCR) land. There was based on interview with village Representative of Kg. Tampat, Kg. Sungai-Sungai, Kg. Dampiron, Kg. Kaibotan, and Kg. Menonood.</p>
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**ATTACHMENT 4**

**DETAILS OF NON-CONFORMITIES AND CORRECTIVE ACTIONS TAKEN**

<b>P &amp; C Indicator</b>	<b>Specification Major/Minor</b>	<b>Detail Non-conformances</b>	<b>Root Cause &amp; Corrective Action Taken by the CU</b>	<b>Verification Statement by Auditors</b>
3.4.3 DA 01 2022	Major	<p>Requirement: 3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>Finding: The SIA (Social Impact Assessment) Management Action Plan 2022 for all operating units within Sri Kamusan CU were not reviewed and updated regularly in a participatory way.</p> <p>Objective evidence: The following social issues faced by the workers not taken into account. In particular, the following issues were not participatory assessed:</p> <ol style="list-style-type: none"> <li>1. Children's education at Petagas Division especially on transportation to the Humana / CLC.</li> <li>2. Action plan on Community Learning Center (CLC) status/progression – closed due to no teacher replacement.</li> <li>3. Sharing 2 family in 1 house (2 units) due to limited housing unit at Bungaya Division.</li> <li>4. Dependent passport (Bonceng) payment via monthly deduction was not clear clarified to the workers at Hibumas 1 Estate. Workers queries on the deduction, until when the deduction supposed to be made.</li> </ol>	<p>Root cause: During meeting of Social &amp; Welfare Committee, the workers representatives were requested to put forward any issues, grievances or suggestions to the committee or management for considerations and appropriate actions to be taken. However, these highlighted four issues were not mentioned by the workers representatives to be considered by the estates management. On social issue no 3, estate management already budgeted two blocks of workers houses at Bonggaya Division for 2022 and expected to be completed by year end.</p> <p>Correction: Sri Kamusan CU estates and sustainability dept had discussed the four highlighted social issues on 8/4/2022 and had come up with the agreed corrective actions i.e:</p> <p>Corrective Action: SIA management plan had been reviewed and revised on 11/4/2022 by putting in the four highlighted issues and the agreed corrective action plans. The management plan will be reviewed and revised periodically to track the progress until completion.</p>	<p>The SIA management pan which was reviewed and revised on 11/4/2022 has been verified by the auditor. The SIA management plan has been included the issues as per the objective evidence of the NCR.</p> <p>Status: CLOSED</p>



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**ATTACHMENT 5**

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

No	P & C Indicator	Specification Major/Minor	Detail Non-conformances	Verification Statement by Auditors
1.	<p><b>Indicator 2.2.2</b></p> <p>RAR01/2021</p>	<p><b>Major (upgraded)</b></p>	<p><b>Requirement: Indicator 2.2.2</b> - All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.</p> <p><b>Finding:</b> Contractors are not able to demonstrate compliance with applicable legal requirements.</p> <p><b>Objective evidence:</b> Audit found two contractors of FFB transporter at Hibumas 1 Estate - Syarikat Pengangkutan Nur and at Sapi Sugut Estate - Syarikat Paulus enterprise found the contractors were not able to demonstrate compliance with legal requirements by not paying their workers KWSP, SOCSO or insurance</p>	<p>Syarikat Paulus Enterprise has been stopping their work with Sapi Sugut Estate and Sekar Imej Estate w.e.f 31/12/2021. Only Landasan Kembar has been worked as contractor in Sapi Sugut and Sekar Imej Estate.</p> <p>Agreement dated 18/2/2022. Landasan Kembar has been demonstrate compliance with legal requirements by paying their workers EPF and SOCSO. Payslip for the month of January 2022 has been sighted for workers name Donne bin Philip. He has worked as lorry driver.</p> <p>Agreement dated 26/1/2022. Lotus Trackway Sdn Bhd and Landasan Kembar Sdn Bhd for the works CPO &amp; PK transport has been demonstrate compliance with legal requirements by paying their workers EPF and SOCSO. Payslip for the month of January 2022 has been sighted for workers name Borhan bin Samsuddin and Daud @ David ak Bangkok.</p> <p>Agreement dated 4/5/2021. Syarikat Pengangkutan Nur for the works of transporting FFB including loose fruit from Hibumas 1 Estate to Sri Kamusan POM has been demonstrate compliance with legal requirements by paying their workers EPF and SOCSO. Payslip for the month of January 2022 has been sighted for workers name Mohama Sampara and Ahmad bin Mando.</p> <p>Closed.</p>
2.	<p><b>Indicator 3.7.3</b></p> <p>RAR02/2021</p>	<p><b>Minor</b></p>	<p><b>Requirement: Indicator 3.7.3</b> – Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p><b>Finding:</b> Training was not provided to personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS).</p>	<p>Training related to Supply Chain Certification System been conducted on 20/5/2021 and 24/8/2021 by respective from HQ involved employees from related areas.</p> <p>Closed.</p>

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			<p><b>Objective evidence:</b> Training record for employees (staff &amp; weighbridge clerk) carried out the tasks critical to the effective implementation of the Supply Chain Certification Standard at Sri Kamusan FFB Collection Center were not available.</p>	
3.	<p><b>Indicator 6.3.2</b></p> <p>RAR03/2021</p>	<p><b>Minor</b></p>	<p><b>Requirement: Indicator 6.3.2</b> – Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p><b>Finding:</b> Workers representatives from social and welfare committee was not available and not freely elected.</p> <p>Objective evidence:</p> <ol style="list-style-type: none"> <li>1. Audit at Sri Kamusan Estate found workers representatives for Workers' Welfare and Social Committees have been elected by Estate management.</li> <li>2. There was no worker representative from contractor workers at Sapi Sugut Estate and Jebawang Estate</li> </ol>	<p>Evidence is available that management holds regular meetings with the Workers' Welfare and Social Committees. The interval meeting was carried out by forthrightly basis. This also been implemented due to impact assessment. Main reason to gather the information such as feedback from the workers in term of Social, Safety, Environmental, Welfare issues, etc. All the feedbacks were highlighted in the minutes meeting and SIA action plan. At Sekar Imej &amp; Sapi Sugut Estate, latest meetings were held on 11/12/2021, for Jebwang &amp; Hibumas 2 Estate on 22/09/2021, for Sri Kamusan Estate on 14/12/2021 and Hibumas 1 Estate on 13/09/2021 which were attended by management representatives and worker representatives. Among the issues raised creche issues, dustbin at line site, repairs to staff housing, Humana, etc.</p> <p>Based on interview and documents review, worker representatives from checkroll workers and contractor workers have been freely elected by the workers themselves as a communication channel between management and workers. Sighted also appointment letter for the worker representatives</p> <p>Closed.</p>
4.	<p><b>Indicator 2.1.3</b></p> <p>KN01/2021</p>	<p><b>Major (upgraded)</b></p>	<p><b>Requirement: Indicator 2.1.3</b> - Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p><b>Finding:</b> Legal or authorised boundaries were not clearly demarcated and visibly maintained. Corrective action plan was not effectively implemented. Thus, <b>Minor NCR MZK02/2020 was upgraded to Major NCR KN01/2021</b></p> <p><b>Objective evidence:</b></p> <ol style="list-style-type: none"> <li>1. Visit to legal boundaries between Sri Kamusan</li> </ol>	<p>A visit has been made to legal boundaries between Sri Kamusan Estate (Block 5) with Kg. Tangkangit, found only several red painted pole and clearly demarcated and maintained along the estate boundaries. Another visit to legal boundaries between Hibumas 1 Estate (Block 47) with IJM Plantation, and Hibumas 1 Estate (Block 23) with IDC found the boundary paint were maintained. Again, visit to Jebawang Estate (Block 10) adjacent with IJM Plantation the boundary stick was found maintained. Audit concludes that legal or authorised boundaries were clearly demarcated and visibly maintained. Therefore, previous NCR KN01/2021 was satisfactorily closed.</p> <p>Closed.</p>

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			<p>Estate (Block 5) with Kg. Tangkangit, found only one red painted pole and was not clearly demarcated and not maintained along the estate boundaries</p> <p>2. Visit to legal boundaries between Hibumas 1 Estate (Block 47) with IJM Plantation, and Hibumas 1 Estate (Block 23) with IDC found the boundary paint were faded and not maintained, even the estate staff were unable to find the boundaries.</p> <p>3. Visit to Jebawang Estate (Block 10) adjacent with IJM Plantation was not found.</p>	
5.	<p><b>Indicator 3.4.2</b></p> <p>KN02/2021</p>	<p><b>Minor</b></p>	<p><b>Requirement: Indicator 3.4.2</b> - For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p><b>Finding:</b> The current affected surrounding stakeholders was not included into the Social Impact Assessment (SIA)</p> <p><b>Objective evidence:</b>                      Audit found the Sri Kamusan CU has identified new affected stakeholders of surrounding local indigenous communities. This information was collected during stakeholders meeting, and registered smallholders for FFB suppliers, from time to time. Example of names of villages below, were not updated into the SIA.</p> <ul style="list-style-type: none"> <li>• Sri Kamusan Estate – Kg. Lingkabau, Kg. Tangkangit, Kg. Lintabong, and others</li> <li>• Hibumas 1 Estate – Kg Sungai Sungai, Kg. Sabang, and others</li> <li>• Jebawang Estate – Kg. Banang, Kg. Linayukan, and others</li> <li>• Sapi Sugut Estate – Kg. Kinadaan / Matanggal Sugut, Kg. Binsulong and others</li> </ul>	<p>Updated accordingly.</p> <p>Closed.</p>
6.	<p><b>Indicator</b></p>	<p><b>Major</b></p>	<p><b>Requirement: Indicator 7.12.4 (C)</b> – Where HCVs,</p>	<p>It was found that The HCV Management Plan at all estates was developed with</p>

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	<p><b>7.12.4 (C)</b></p> <p>KN03/ 2021</p>	<p><b>(recurrence)</b></p>	<p>HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p><b>Finding:</b> The HCV Management Plan was not developed without consultation with relevant stakeholders in adaptive to changes in HCVs plans. Corrective action plan from the last surveillance audit (2020) was not effectively implemented. Thus, <b>Major NCR MZK06/2020 was re-issued to Major NCR KN03/2021</b></p> <p><b>Objective evidence:</b></p> <ol style="list-style-type: none"> <li>1. During recertification audit, it was found the “High Conservation Value (HCV) Monitoring &amp; Action Plan (2015-2019)” was amended to “Review &amp; Summary HCV Management and Action Plan (2019-2020)”. An effort has been made by the Sri Kamusan CU to identify, protect and/or enhance forest connectivity in CU including new project of “Sekar Imej Conservation Area project”. However, the amended action plan was not sufficient to comply with indicator 7.12.4.</li> <li>2. Visit to HCV site at Sri Kamusan Estate (Block 55), Hibumas 1 (Parcel 21), Jebawang Estate (Block 10) found the signage was not sufficient, as required in Sri Kamusan’s HCV Management and Action Plan (2019-2020).</li> <li>3. Sri Kamusan CU has identified significant stakeholders. i.e., HUTAN (NGO), Wildlife Department, SEARRP, Sabah Forestry</li> </ol>	<p>consultation with relevant stakeholders on 25 May 2021 for changes of HCV Plan.</p> <p>Closed.</p>
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			Department (FRC) and others. However, proper or official consultation with these stakeholders to review the management plan was not conducted.	
7.	<b>Indicator 3.3.2</b>  STK01/ 2021	<b>Minor</b>	<p><b>Requirement: Indicator 3.3.2</b> – A mechanism to check consistent implementation of procedures is in place</p> <p><b>Finding:</b> Consistent implementation of procedures was not in place.</p> <p><b>Objective evidence:</b> At time of visit, consistent implementation of procedures as per Wilmar International Limited 2011 Agriculture Manual &amp; SOP for Oil Palm were not implemented as per:</p> <ol style="list-style-type: none"> <li>Part 2: Upkeep Mature Oil Palm Chapter 6 – Item 2.2 Inter-row maintenance to eradicate the large numbers of VOPs and woody growths in Block 26 of Hibumas 1 Estate and in Block 5 of Jebawang Estate.</li> <li>Chapter 7 Item 9.2 to collect all loose fruits and harvested bunches in Block 26 of Hibumas 1 Estate and in Block 5 of Jebawang Estate</li> </ol>	<p>Random interview with the estate workers and staff showed that they understand the requirement stated in the SOPs. For example, it was observed that harvesting standards and chemicals usage had been properly understood by the interviewed workers harvesting, spraying, slashing, and loose fruit collection. All the field condition was in good condition and palm circle were clear from VOPS, woody growth, etc for easily for loose fruits collection.</p> <p>Closed.</p>
8.	<b>Indicator 7.2.2 (C)</b>  STK02/ 2021	<b>Major</b>	<p><b>Requirement: Indicator 7.2.2 (C)</b> – Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p><b>Finding:</b> The amount of active ingredients of pesticides applied per ha were not computed correctly.</p> <p><b>Objective evidence:</b> At time of audit, it was noted that on Sri Kamusan Estate, Hibumas 1 Estate and Sapi Sugut Estate the amount of active ingredients of pesticides used were</p>	<p>During site visits and verification of A.i per has (recorded in form “Kadar Pencampuran Racun”) the amount of active ingredients of pesticides used were maintained correctly.</p> <p>Average A.i per ha per year has been used as per below:</p> <ul style="list-style-type: none"> <li>Alion – 0.03</li> <li>Ansar – 0.27</li> <li>Supersate – 0.34</li> <li>Kadet – 0.17</li> <li>Glyphosate – 0.38</li> <li>Nupol – 0.03</li> <li>Kenlon – 0.15</li> <li>Kenly – 0.01</li> </ul> <p>Closed.</p>

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			not maintained correctly.	
9.	<b>Indicator 2.1.1 (C)</b>  DA01/ 2021	<b>Major (Recurrence)</b>	<p><b>Requirement: Indicator 2.1.1 (C)</b> – The unit of certification complies with applicable legal requirements.</p> <p><b>Finding:</b> The unit of certification was not complied with Occupational Safety and Health (Notification of Accident, Dangerous Occurrence, Occupational Poisoning and Occupational Disease) Regulations 2004, refer Regulation 10 Records Subsection 3. Requires JKKP 8 shall be sent to DOSH before 31<sup>st</sup> January of the following year</p> <p><b>Objective evidence:</b> Audit at Hibumas 1 Estate and Jebawang Estate found JKKP 8 Form for all accidents and dangerous occurrences which have occurred in year 2020 was send to DOSH via MyKKP System after 31 January 2021.</p>	<p>Reviewed submission before 31<sup>st</sup> Jan.</p> <p>Closed.</p>
10	<b>Indicator 3.2.1 (C)</b>  DA02/ 2021	<b>Major (Recurrence)</b>	<p><b>Requirement: Indicator 3.2.1 (C)</b> – The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p><b>Finding:</b> The action plan for continuous improvement was not fully implemented, based on consideration of the main environmental impacts and opportunities of the unit of certification.</p> <p><b>Objective evidence:</b> The action plan for continuous improvement at Hibumas 1 and Sri Kamusan Estates were not satisfactorily implemented. Corrective action plan during last surveillance 4 audit (DA10/2020) was not</p>	<p>The organization had established continuous improvement plan (CIP) with latest revision on 29<sup>th</sup> May 2021 and this action planned integrated with list of CAPEX for respective year. Sighted among the items been include were:</p> <ol style="list-style-type: none"> <li>1. Replace of wooden pellets to plastic pellets.</li> <li>2. Upgrade drainage system at line site</li> <li>3. Improve existing building structure which is in poor condition (SW Store, Chemical store)</li> <li>4. Sekar Imej Conservation Area project.</li> <li>5. Installation of 1 unit ESP system to limit boiler smoke and particulate emission</li> <li>6. Increase sterilizer efficiency</li> <li>7. New instrument for POME performance monitoring</li> <li>8. Install 400 kVA diesel generator</li> </ol> <p>Closed.</p>

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			effectively implemented as the following activities/operation below:  1) Wastes Management (Scheduled Wastes & Recycling Wastes) at Sri Kamusan Estate, Contractor Workshop Block 11 Phase 1 and Hibumas 1 Estate, Contractor Workshop Block 24 Parcel 14 (7.3.1) 2) Lubricant / Hydraulic Oil Spillage at Sri Kamusan Estate, Contractor Workshop Block 11 Phase 1 and Hibumas 1 Estate, Contractor Workshop Block 24 Parcel 14 (refer indicator 7.10.3)	
11	<b>Indicator 3.7.2</b>  DA03 /2021	<b>Major (Upgraded)</b>	<p><b>Requirement: Indicator 3.7.2</b> – Records of training are maintained, where appropriate on an individual basis.</p> <p><b>Finding:</b> Records of training was not maintained and available, where appropriate on an individual basis (contract workers)</p> <p><b>Objective evidence:</b> Records of trainings to covers applicable aspects of the RSPO P&amp;C i.e., safety, environmental and the right of workers aspect was not available for contract workers (FFB Driver):</p> <ol style="list-style-type: none"> <li>1) Sri Kamusan Estate (FFB Contractor – Syarikat Sri Timbulus).</li> <li>2) Hibumas 2 Estate (FFB Contractor – Syarikat Pengangkutan Nur)</li> <li>3) Jebawang Estate (FFB Contractor – Syarikat Pengangkutan Jumdin)</li> <li>4) Sapi Sugut Estate (FFB Contractor – Paulus Enterprise)</li> </ol>	<p>Training record available.</p> <p>Closed.</p>
12	<b>Indicator</b>	<b>Major</b>	<b>Requirement: Indicator 6.7.3 (C)</b> – Workers use	From the site visit or at workplace such as, spraying activities, harvesting

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	<p><b>6.7.3 (C)</b></p> <p>DA04/ 2021</p>	<p><b>(Recurrence)</b></p>	<p>appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p><b>Finding:</b> Workers did not wear appropriate personal protective equipment (PPE) at the place of work to cover all potentially hazardous operations, such as pesticide application.</p> <p><b>Objective evidence:</b> During site inspection at Jebawang Estate Block 5, sighted 2 sprayers woodies Epiphyte did not wear appropriate PPE i.e., apron and goggle according to Safe and Standard Operating Procedure (SSOP) (Woodies Poisoning) and HIRARC</p>	<p>activities, manuring activities and LF collection, the workers were seen to wearing appropriate PPE such as face masks respirators, goggles, rubber boots, nitrile gloves, apron and hard hat, to cover all potentially hazardous operations.</p> <p>Closed.</p>
<p>13</p>	<p><b>Indicator 7.3.1</b></p> <p>DA05/ 2021</p>	<p><b>Major (Recurrence)</b></p>	<p><b>Requirement: Indicator 7.3.1</b> – A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p><b>Finding:</b> A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics was not implemented again.</p> <p><b>Objective evidence:</b> 1) During site visit at Sri Kamusan Estate, Contractor Workshop at Block 11 Phase 1 (FFB Contractor – Syarikat Sri Timbulus), sighted bottles, used tyres, cans and empty fertilizer bags was not disposed</p>	<p>3) During site visit at Sri Kamusan Estate, Contractor Workshop at Block 11 Phase 1 (FFB Contractor – Syarikat Sri Timbulus), sighted bottles, used tyres, cans and empty fertilizer bags was not disposed according to the waste management plan.</p> <p>4) During site visit at Hibumas 1 Estate, Contractor Workshop at Block 24 Parcel 14/17 (FFB Contractor – Syarikat Pengangkutan Nur), sighted bottles, used tyres, cans, empty fertilizer bags, empty agrochemical container and used battery was not disposed according to the plan.</p> <p>Corrective 1) The SOP for “Storage and Disposal of Common Waste Procedure” was amended to include contractors’ activities and operations.</p> <p>Closed.</p>



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			<p>according to the waste management plan.</p> <p>2) During site visit at Hibumas 1 Estate, Contractor Workshop at Block 24 Parcel 14/17 (FFB Contractor – Syarikat Pengangkutan Nur), sighted bottles, used tyres, cans, empty fertilizer bags, empty agrochemical container and used battery was not disposed according to the plan.</p>	
14	<p><b>Indicator 7.3.3</b></p> <p>DA06/2021</p>	<p><b>Minor</b></p>	<p><b>Requirement: Indicator 7.3.3</b> – The unit of certification does not use open fire for waste disposal.</p> <p><b>Finding:</b> The unit of certification does use open fire for waste disposal.</p> <p><b>Objective evidence:</b> During audit at Sri Kamusan worker's quarters site and contract workers housing site at Block 11 Phase 1, traces of burnt waste were sighted. Interview with workers confirmed they had used fire for waste disposal.</p>	<p>During audit at Sri Kamusan worker's quarters site and contract workers housing site at Block 11 Phase 1, traces of burnt waste were sighted. Interview with workers confirmed they had used fire for waste disposal.</p> <p>Closed.</p>
15	<p><b>Indicator 7.10.3 (C)</b></p> <p>DA07/2021</p>	<p><b>Major (Recurrence)</b></p>	<p><b>Requirement: Indicator 7.10.3 (C)</b> – Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored.</p> <p><b>Finding:</b> Waste and Pollution – Identification, Prevention, Mitigation and Improvement Plan was not implemented and monitored.</p> <p><b>Objective evidence:</b> 1) During site inspection at Sri Kamusan Estate, Contractor Workshop Block 11 Phase 1 (FFB Contractor – Syarikat Sri Timbulus), sighted a lot of lubricant/hydraulic oil spillage on the ground. From the observation, the used lubricant/hydraulic oil was not appropriately disposed. Furthermore, no action has been taken on the oil spillage during the audit time.</p>	<p>Sighted during site visit, the organization had well implemented and monitored the program on prevention plan.</p> <p>Closed.</p>

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			2) During site inspection at Hibumas 1 Estate, Contractor Workshop Block 24 Parcel 14/17 (FFB Contractor – Syarikat Pengangkutan Nur), sighted a lot of lubricant/hydraulic oil spillage on the ground. From the observation, the used lubricant/hydraulic oil was not appropriately disposed. Furthermore, no action has been taken on the oil spillage during the audit time.	

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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	2021	Newly added into Wilmar Membership in 2018, 3 years till certification dateline
10	PPB Oil Palms Berhad	Laba Utama Sdn Bhd - Jebawang Sdn Bhd	Sri Kamusan Palm Oil Mill	Sandakan	2022	Newly acquired in 2019, 3 years till certification dateline

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**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