



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

File Ref. : ES11320001

RSPO PUBLIC SUMMARY REPORT

CLIENT : WILMAR INTERNATIONAL LIMITED – SAREMAS 1 CERTIFICATION UNIT

PARENT COMPANY : WILMAR INTERNATIONAL LIMITED

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

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

Certification Unit	Mill and Supply Base	GPS Location		Location
		Latitude	Longitude	
Saremas 1 Certification Unit (CU)	Saremas 1 POM	3°31'32.199"N	113°44'39.092"E	18 KM off KM 115, Bintulu – Miri Road, 97008, Bintulu Sarawak Malaysia
	Saremas 1 Estate	3°31'20.932"N	113°45'12.386"E	
	Suai Estate	3°35'43.549"N	113°44'10.349"E	

MAP : See Attachment 1

AUDIT DATE : 18-22/4/2022

DURATION : 25 auditor days

TYPE OF AUDIT : Annual Surveillance Audit No. 1 & 2 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 : 14 Jun 2020 – 13 Jun 2025

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 : **22/07/2022**

Date : **01 Aug 2022**

RSPO PUBLIC SUMMARY REPORT

SUMMARY OF AUDITS

Recertification Audit			
On-site audit date	: 16-20 Mac 2020	No. of auditor days:	18
Audit team	: Amir B Bahari (LA) Mohd Ab Raouf Asis (A), Mohd Zulfakar Kamaruzaman (A), Mohd Norddin Abdul Jalil (A).		
No. of major NCR	: 3	Indicator: 6.7.3 / 5.5.2 / 7.12.4	Closing date: 3/06/2020
No. of minor NCR	: 6	Indicator: 2.2.3 / 6.7.4 / 6.5.3 / 1.1.5 / 7.12.7 / 3.3.2	
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees	Settlers	Villagers / Local communities
	/		/
	Contract workers	NGOs	Govt. agency
			Independent growers
	Indigenous people	Contractors	Others (Please specify)
	/	/	
Supply base sampled	: Saremas 1 POM, Saremas 1 Estate, Suai Estate		
Justification of audit planning	: Total allocation of auditor days for Saremas 1 CU were: Mill = 5 days (4.0 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1.0 day for supply chain certification systems). Saremas 1 & Suai Estate = 6 days each estate (total 12) or verification of safety and health, environment, good agriculture best practices, Social, HCV and GHG verification plus the verification of unproductive area. 1 day for the mill /estates remaining coverage.		
Changes since the last audit	: See notes provided in Table 1 - Summary of Information.		
Report approved by	: Kamini Sooriamorthy	Approval date :	29/06/2020

Annual Surveillance Audit 2 (Combine with Surveillance Audit 1)			
On-site audit date	: 6-8/9/2021 (Remote) 18-22/4/2022 (Onsite)	No. of auditor days :	25
Audit team	: Remote: Mohd Ab Raouf bin Asis (LA), Rozaimie bin Ab Rahman, Mohd Zulfakar bin Kamaruzaman Onsite: Mohd Ab Raouf bin Asis (LA), Mohd Zulfakar bin Kamaruzaman, Dzulfiqar bin Azmi, Ismail Adnan bin Abdul Malek		
No. of major NCR	: Indicator: Remote: 7.2.10, 6.1.5 Onsite: 2.1.1, 3.3.2 (Upgraded), 3.4.3, 3.6.1, 3.7.1, 6.2.1, 6.2.2, 6.2.4, 6.5.3 (Upgraded)	Closing date :	19/7/2022
No. of minor NCR	: Indicator : Remote: 4.2.3. Onsite: Nil		
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees / Workers organizations	Settlers	Villagers / Local communities
	✓	NA	✓
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
	✓	NA	
	Indigenous people	Contractor	Others (Please specify)
	NA	✓	
Supply base sampled	: Saremas 1 Estate & Suai Estate		
Changes since the last audit	: No changes		
Justification of audit planning	: Allocation of mandays during onsite: 4-man days for each site units (estates) and as for POM 4-man days. Remote audit allocated 5 mandays. Combined audit ASA 1-2021 & ASA 2-2022.		
Name of peer reviewer	: NA		
Report approved by	: Kamini Sooriamorthy	Approval date :	22/7/2022

RSPO PUBLIC SUMMARY REPORT

SUMMARY OF INFORMATION

TABLE 1

	STAGE 2 / RA	ASA 1 &ASA 2	ASA 3	ASA 4
*Projection Period / Reporting Period	*Mac 2020 – Feb 2021	Apr 2022- Mar 2023		
Certified FFB Processed (MT)	181,883.33	259,116.67		
Production of Certified CPO (MT)	40,730.83	57,003.98		
Production of Certified PK (MT)	6,674.58	10,327.66		
Certified Areas (Ha)	11,677.78	11,677.78		
Planted Areas (Ha)	9,253.01	9,253.01		
Production Areas (Ha)	7,319.13	8,759.85		
HCV Areas / Conservation Areas (Ha)	324.95	324.95		
REMARKS	*The actual reporting period covered for this assessment was from March 2020 to March 2022.			

TABLE 2

	PO	PK
**Last years certified volume (MT)	99,404.54	17,246.15
Last years actual certified sold (MT)	86,991.52	12,652.01
Last years actual sold under other schemes (MT)	0	0
Last years sold conventional (MT)	0	0
Last year actual sold CSPO credits (where applicable)	0	0
New year certified volume (MT)	57,003.98	10,327.66

***Application of extension of volumes were carried out in May-Sept-Nov 2021 and March-June 2022, and it was all approved by RSPO accordingly. The reported above was the total of the certified volumes + extended volumes.*

Table of contents		Page
1.0	AUDIT PROCESS	6
	1.1 Certification body	6
	1.2 Qualification of audit team	6
	1.3 Audit methodology	6
	1.4 Stakeholder consultation	6
	1.5 Audit plan	6
	1.6 Date of next audit	9
2.0	SCOPE OF CERTIFICATION AUDIT	9
	2.1 Description of the certification unit	
	2.2 Description of the Supply Base (including planting profile)	
	2.3 Organization Information / Contact Person(s)	
3.0	AUDIT FINDINGS	12
	3.1 Changes to certified products in accordance to the production of the previous year	
	3.2 Progress and changes in time bound plan	
	3.3. Other changes (e.g. organizational structure, new contact person, addresses, etc.)	
	3.4 Status of previous non-conformities * (refer to Attachment 5)	
	3.5 Complaint received from stakeholder (if any)	
4.0	DETAILS OF NON-CONFORMITY REPORT	13
	4.1 For P&C (refer to Attachment 3)	
	4.2 For SC (refer to Attachment 3 – Supply Chain Requirements for Mills)	
5.0	AUDIT CONCLUSION	13
6.0	RECOMMENDATION	14
	List of Attachment	
	Attachment 1 : Map of CU	15
	Attachment 2 : RSPO Audit Plan	16
	Attachment 3 : RSPO P&C Audit Checklist and Findings	22
	Attachment 4 : Details of Non-conformities and Corrective Actions Taken	73
	Attachment 5 : Status of Non-conformities Previously Identified	82
	Attachment 6 : Time-bound Plan	86

1.0 AUDIT PROCESS

1.1 Certification Body

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

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

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Mohd Ab Raouf bin Asis	Lead Auditor, Social	Holds a B.Sc. in Manufacturing (Production and Operation). He had more than 7 years of working experience in the oil palm operation. He has experience in auditing since 2016. He was successfully attended Quality Management System (ISO 9001:2015), Environmental Management System and OHS 18001:2007 lead assessor course in 2016. Currently he qualified for RSPO P&C Lead Auditor and MSPO Lead Auditor.
Mohd Zulfakar bin Kamaruzaman	Auditor, SC, Social	Holds a B.Sc. Forestry from UPM. He had several years of working experience in the oil palm operation. He is a qualified RSPO P&C, SC and MSPO Lead Auditor.
Dzulfiqar bin Azmi	Auditor, Safety, Environment, GAP	Holds a B.Sc. Plantation Management from UiTM. He had several years of working experience in the oil palm operation. He is a qualified RSPO P&C and MSPO Lead Auditor.
Ismail Adnan bin Abdul Malek	Auditor, Social, HCV	Holds a Master of Forestry, University of British Columbia, Canada. One year experience as Sub Assistant Conservator of Forest at the Pahang Forest Department, involved with Forest Administration/Management and Enforcement. Next, seven years spent as Forest Officer/Logging Superintendent at Syarikat Jengka Sdn. Bhd (SJSB), an integrated timber complex in Pahang. Responsible for Forest Licensing/ Administration, Forest Mapping, Road Construction and Logging Operations. Senior Lecturer at the Forestry Faculty, Universiti Putra Malaysia and currently as Auditor at the Food, Agriculture and Forestry, SIRIM QAS International Sdn Bhd, since 2016.

RSPO PUBLIC SUMMARY REPORT

1.3 Audit methodology

The audit covered the Saremas 1 palm oil mill and 2 of its supply base. The sampling methodology applies for supply base with higher than four estates, and shall be conducted in conformance with the requirement specified in the RSPO Certification Systems Document, Nov 2020. The 2 supply base covered during the audit are Saremas 1 Estate and Suai Estate. The audit included an on-site audit to the estates, mill and settlers' houses 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

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"> a) All workers signed the employment agreements with the estates/mill. They understood the contents of agreement, as these were prepared in English/Bahasa as the case may be. For those who couldn't read, the contents were explained to them in language they understood, usually by fellow countrymen who has worked in Malaysia longer. b) They are aware of their working hours (8 hours) and confirmed they were paid overtime for any work in excess of 8 hours. There was no forced overtime. c) They have been getting salaries above RM1,100. Double paid for working on rest day applied. Salaries were paid before the 7th of every month. d) No abuse at work, and no sexual harassment. They understand what constitutes sexual harassment. e) No discrimination between migrant workers and local workers, between male and female workers. f) Comfortable housing with water and electricity provided. g) Have access to affordable food from the canteen/sundry shops within the estate/mill premises. h) Entitled to free medical facilities at the estate clinic. i) Have representatives' 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. j) They knew the types of work offered at Saremas 1 CU (mill & estates) when they were in their countries of origin. k) All workers keep their own passports at office locker. l) All sampled workers have valid passport and work permits m) They receive their wages in cheque, changed the particular cheque at sundry shop. Since it is difficult to go to the nearest town due to the distance, their salaries are being brought in by the sundry shop owner. n) Undocumented foreign workers were not found at Saremas 1 CU, during the audit but the auditor has been raised on the permit works from the other estate, but work at Saremas 1 CU. This has been raised under indicator 2.1.1. o) 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.

RSPO PUBLIC SUMMARY REPORT

2) Settlers	Not available for this audit.
3) Villagers / Local communities (including women representatives, displaced communities)	Villagers/local communities consulted. No overlapping boundaries between community land and Saremas 1 plantation. No extended land claim from neighbouring communities.
4) Suppliers	Suppliers are mainly for hardware and maintenance parts since the establishment of the CU. Fair dealings with the units in Saremas 1 CU. Payments are made within 1 months of invoice.
5) Contract workers (local / foreign / Orang Asli workers / male & female)	Agreement for contractor workers in Saremas 1 Estate i.e., Bunga Pengantin not available to the workers and was not explained to them in language they understand. This has been raised as NCR under indicator 6.2.1.
6) Local & national NGOs	Relevant NGO is WWF-Malaysia and SADIA is in the list of stakeholders. No issues were raised / recorded. Relationship is harmonious and cordial.
7) Government agencies / Statutory bodies	The Government Agencies are mainly related to statutory bodies e.g., MPOB, DOSH, DOE, NREB, JTK BOMBA, PDRM, Immigration Dept, Indonesian Consulate. The Sarawak Forestry Corporation (SFC) and the Sarawak Forestry Department (SFD) are also included in the lists. No issues were raised / recorded. Relationship was harmonious and cordial.
8) Independent growers / Smallholders	The neighboring estates are owned sister estates and Sime Darby Plantations. No issues were raised / recorded. Relationship is harmonious and cordial.
9) Indigenous people	Not available during this audit.
10) Contractor	Significant no. of works in the Saremas 1 CU are managed within the Company resources. Delivery of FFB and CPO are handled through external vendors fleet of trailers and lorries. Mainly contract works are awarded to Contractors on construction of houses, buildings and others were interviewed. There were no issues raised / recorded. Signing of contract was with WIL Head Office. Contract terms are clear and fair.
11) Previous land owner (if any)	Not available for this audit.
12) Others (please specify)	Food facilities are managed by WIL. Each complex having separate complex facilities. Provision shops are available at the estates visited. No issues raised on the pricing and services.

1.5 Audit plan : Refer to Attachment 2

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

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Saremas 1 certification unit (CU) is under the Saremas Sdn. Bhd. (SSB), a wholly owned subsidiary of PPB Oil Palms Berhad (PPB Oil Palms). The CU comprised of the Saremas 1 Palm Oil Mill, Saremas 1 Estate and Suai Estate. All the estates are owned by PPB. The total combined land area of the two (2) estates is 11,677.78 ha of which 9,253.01 ha were planted with oil palm. The HCV area for Saremas 1 CU is 324.95 ha which come from Saremas 1 Estate (225.24 ha) and Suai Estate (99.71 ha). The Saremas1 POM has a mill capacity of 60 MT/hr.

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

The FFB was sourced from company owned estates that were certified and small holders and small growers surrounding the Saremas 1 CU. Details of the FFB actual and projected contribution from each source to the mill are shown in the following tables. Details of the FFB actual and projected contribution from each source to the mill are shown in the following tables.

Table 1: Actual FFB production by the supply base for the last reporting period (Mac 2020 – Mac 2022)

Estates	FFB Production	
	Tonnes	Percentage (%)
Saremas 1 Estate	233,525.62	47.41
Suai Estate	166,698.56	33.84
Total	400,224.18	
Saremas 2	3,603.00	0.73
Segarmas	815.29	0.17
Kaminsky	151.16	0.03
Total	4,569.45	
Third party suppliers (non-certified)	87,745.41	17.81
Grand total	492,539.04	100

Table 2: Projected FFB production by supply base for the next reporting period (April 2022 – Mac 2023)

CU own estates	FFB Contribution	
	Tonnes	Percentage (%)
Saremas 1	138,975.00	45.86
Suai	120,141.67	39.64
Total	259,116.67	
Other Supply Bases		
Third parties (non-certified)	43,952.89	14.50
Grand Total	303,069.56	100.00

RSPO PUBLIC SUMMARY REPORT

**Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period
(Mac 2020 – Mac 2022)**

RSPO Supply Chain Model: Mass Balance	Total (MT)
FFB Received	492,539.04
FFB Processed	492,533.56
Certified FFB Processed	404,789.13
Non-certified FFB Processed	87,745.41
Crude Palm Oil (CPO)	
Overall CPO Production	106,141.47
Certified CPO Production	87,212.36
Certified CPO delivered as RSPO	86,991.52
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	15,725.11
Certified PK Production	12,831.66
Certified PK delivered as RSPO	12,652.01
Certified PK delivered as non-RSPO	-
Certified CPO delivered under other sustainable schemes	-
Credits traded through Books and Claim	-

RSPO PUBLIC SUMMARY REPORT

**Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period
(April 2022 – Mac 2023)**

	Total (MT)
Certified FFB Received	259,116.67
Certified FFB Processed	259,116.67
Certified CPO Production	57,003.98
Certified PK Production	10,327.66

Table 5 Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Saremas 1	4,578.38	6,007.88
Suai	4,674.63	5,669.90
Total	9,253.01	11,677.78

Table 6 Planting profile for Saremas 1 CU

<u>Estate</u>	<u>Year of planting</u>	<u>Planting Cycle</u>	<u>Mature >xx years (Ha)</u>	<u>Immature < xx years(Ha)</u>	<u>Planted area</u>	<u>% of planted area mature</u>	<u>% of planted area immature</u>
Saremas 1	2010	2nd	882.62		882.62	19.28%	
	2011	2nd	307.73		307.73	6.72%	
	2012	2nd	813.35		813.35	17.77%	
	2013	2nd	1,083.41		1,083.41	23.66%	
	2014	2nd	575.49		575.49	12.57%	
	2017	2nd	372.38		372.38	8.13%	
Suai	2018	2nd	543.40		543.40	11.87%	
	2000	2nd	170.97		170.97	3.66%	
	2001	2nd	267.25		267.25	5.72%	
	2002	2nd	271.86		271.86	5.82%	
	2003	2nd	251.67		251.67	5.38%	
	2004	2nd	222.55		222.55	4.76%	
	2005	2nd	162.97		162.97	3.49%	
	2006	2nd	75.62		75.62	1.62%	
	2012	2nd	145.04		145.04	3.10%	
	2014	2nd	419.83		419.83	8.98%	
	2015	2nd	585.38		585.38	12.52%	
	2016	2nd	590.23		590.23	12.63%	
	2017	2nd	482.28		482.28	10.32%	
	2018	2nd	535.82		535.82	11.46%	
2020	3rd		493.16	493.16		10.55%	
Total			8759.85	493.16	9,253.01		

2.3 Organizational Information/Contact Person(s)

The details of the contact person are as below:

Name	:	Daniel Ngau Wan (DNW) & Chong Hong San (CHS)
Position	:	Group Manager Saremas 1 (DNW) & Group Manager Suai (CHS)
Address	:	18 KM off KM 115, Bintulu– Miri Road, 97008, Bintulu, Sarawak Malaysia
Phone no.	:	0138512699 (DNW) & 019 8549635 (CHS)
Fax no.	:	-
Email	:	daniel.ngauwan@my.wilmar-intl.com honsan.chong@my.wilmar-intl.com

RSPO PUBLIC SUMMARY REPORT

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 the stakeholder

4.0 DETAILS OF NON-CONFORMITY REPORT

4.1 For P&C :

Total no. of minor NCR(s) List : 1 (4.2.3)
(details refer to Attachment 3)

Total no. of major NCR(s) List : 11 (7.2.10, 6.1.5, 2.1.1, 3.3.2 [upgraded], 3.4.3, 3.6.1, 3.7.1, 6.2.1,
(details refer to Attachment 3) 6.2.2, 6.2.4, 6.5.3 [upgraded]).

4.2 For SC :

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

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

5.0 AUDIT CONCLUSION

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

6.0 RECOMMENDATION

No NCR recorded. Recommended to continue certification.

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

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

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

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.

RSPO PUBLIC SUMMARY REPORT

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



19/7/2022

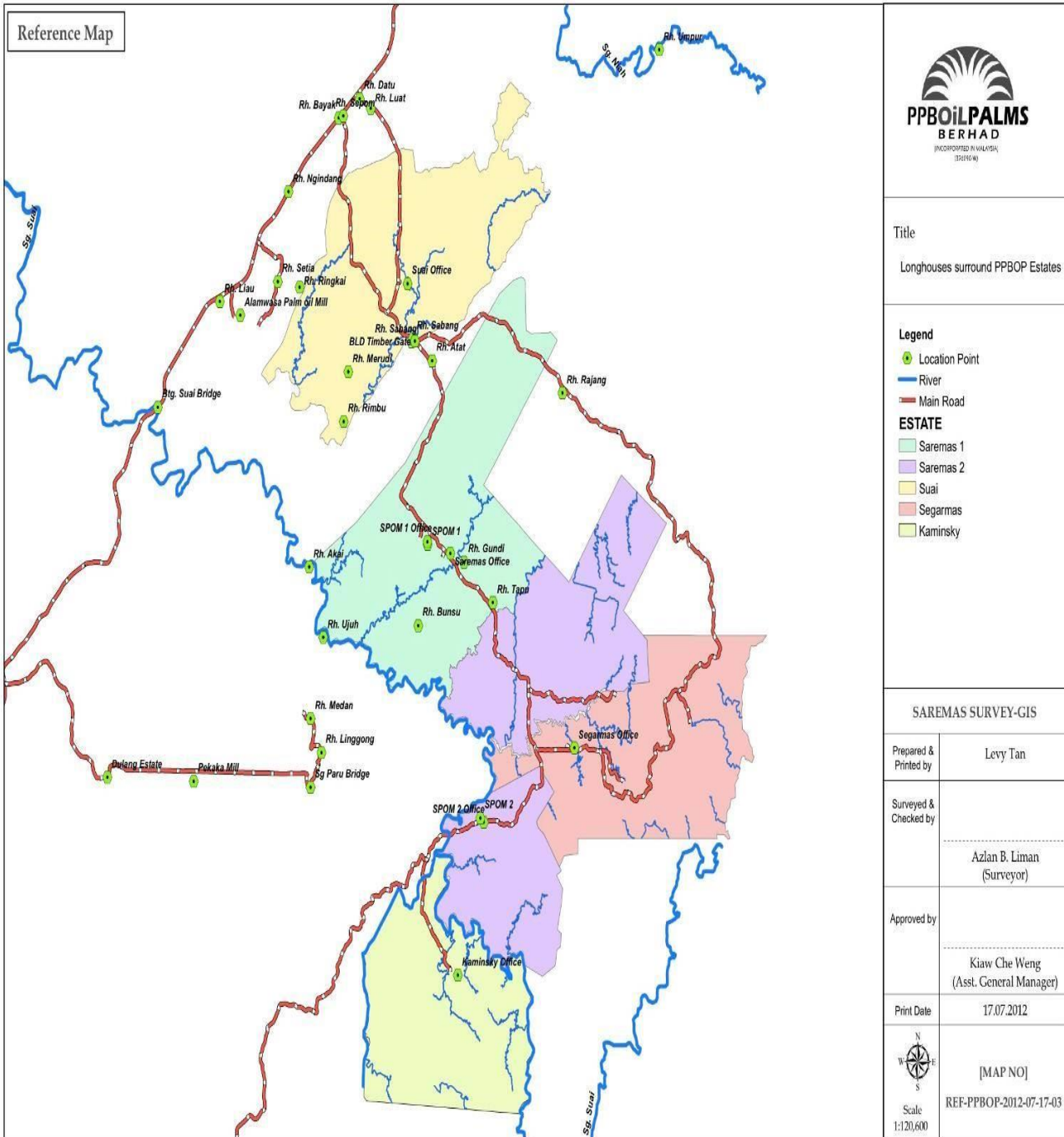
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(Signature)

(Date)

RSPO PUBLIC SUMMARY REPORT

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 : 18th April to 22nd April 2022

3. Site of assessment : Saremas 1 Certification Unit

- Saremas 1 POM
- Saremas 1 Estate
- Suai 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 (Employees), Metrics Template
 - (ii) Auditor :
Dzulfiqar Azmi (DA) – Safety, Environment, GAP, TBP
Mohd Zulfakar bin Kamaruzaman (MZK) – Supply Chain, Social (Employees), Social (External Mill)
Ismail Adnan Abdul Malek (IA) – HCV, Social (External Estate)
 - (iii) Witnessed : Haye bin Semail (ASI)
 - (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**

RSPO PUBLIC SUMMARY REPORT

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	MZK	DA	IA
Day 1-18/4/22 (Monday) 8.30am – 9.00am	Opening Meeting – Venue: Saremas 1 Office <ul style="list-style-type: none"> 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	Site observation to Saremas 1 POM P1, P2, P3,P4,P5, P6, P7 <ul style="list-style-type: none"> Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with employees, contractors, etc Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Legal & Other requirement Assessment on Supply Chain Requirement System 	/	/		
9.00am – 1.00pm	Site observation to Suai Estate P1, P2, P3,P4,P5, P6, P7 <ul style="list-style-type: none"> Social aspects -SIA, management plan & implementation. Stakeholder consultation with affected communities surrounding the estate Land titles user rights Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone Occupational safety & health aspects, chemical management Good agricultural practices Legal & Other requirement Environmental management, waste & chemical management GHG Calculation New planting 			/	/
1.00pm – 2.00pm	Lunch Break / Zuhur Prayer				
2.000pm – 4.00pm	Continue assessment at respective sites	/	/	/	/
4.00pm – 5.00 pm	Audit team discussion / End of Day 1 audit	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	MAR	MZK	DA	IA
Day 2 – 19/4/22 (Tuesday) 8.30am – 1.00pm	Site observation to Suai Estate P1, P2, P3,P4,P5, P6, P7 <ul style="list-style-type: none"> Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with employees, contractors, etc Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. Legal & Other requirement 	/			
8.30am – 1.00pm	Site observation to Saremas 1 POM P1, P2, P3, P4,P5, P6, P7		/		

RSPO PUBLIC SUMMARY REPORT

	<ul style="list-style-type: none"> • Verification of basic information mill/estate/Metric templates • Interview with workers, contractors etc. • Social aspects -SIA, management plan & implementation, workers' quarters, • Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. • Land titles user rights • Good Milling Practice. 				
8.30am – 1.00pm	<p>Site observation to Saremas 1 Estate P1, P2, P3, P4, P5, P6, P7</p> <ul style="list-style-type: none"> • Social aspects -SIA, management plan & implementation. • Stakeholder consultation with affected communities surrounding the estate • Land titles user rights • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects, chemical management • Good agricultural practices • Legal & Other requirement • Environmental management, waste & chemical management • GHG Calculation <p>New planting</p>			/	/
1.00pm – 2.00pm	Lunch Break	/	/	/	/
2.00pm – 4.00pm	Continue assessment at respective site	/	/	/	/
4.00pm – 5.00pm	Audit team discussion / End of Day 2 audit	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	MAR	MZK	DA	IA
Day 3 – 20/4/22 (Wednesday) 8.30am – 1.00pm	<p>Site observation to Suai Estate P1, P2, P3, P4, P5, P6, P7</p> <ul style="list-style-type: none"> • Interview with workers, contractors etc. • Social aspects -SIA, management plan & implementation, workers' quarters, • Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. 	/	/		
8.30am – 1.00pm	<p>Site observation to Saremas 1 POM P1, P2, P3, P4, P5, P6, P7</p> <ul style="list-style-type: none"> • Confirmation of time bound plan & review of partial certification • Occupational safety & health aspects, chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • GHG calculation 			/	

RSPO PUBLIC SUMMARY REPORT

8.30am – 1.00pm	Site observation to Saremas 1 Estate P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Interview with related stakeholders • Social aspects -SIA, management plan & implementation. • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. • Land titles user rights 				/
1.00pm – 2.00pm	Lunch Break	/	/	/	/
2.00pm-4.00pm	Continue assessment at respective site				
4.00pm – 5.00pm	Audit team discussion / End of Day 3 audit	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	MAR	MZK	DA	IA
Day 4 – 21/4/22 (Thursday) 8.30am – 1.00pm	Site observation to Saremas 1 Estate P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> • Interview with workers, contractors etc. • Social aspects -SIA, management plan & implementation, workers' quarters, • Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. 	/	/		
8.30am – 1.00 pm	Site observation to Saremas 1 POM P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> • Confirmation of time bound plan & review of partial certification • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • GHG calculation 			/	
8.30am – 1.00 pm	Site observation to Suai Estate P1, P2, P3, P4,P5, P6, P7 <ul style="list-style-type: none"> • Social aspects -SIA, management plan & implementation. • Stakeholder consultation with affected communities surrounding the estate • Land titles user rights • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Legal & Other requirement 				/
1.00pm – 2.00pm	Lunch Break	/	/	/	/
2.00 pm – 4.00 pm	Continue assessment at respective site	/	/	/	/

RSPO PUBLIC SUMMARY REPORT

Date / Time	Coverage of assessment / Activity / Site	MAR	MZK	DA	IA
4.00pm – 5.00pm	Audit team discussion / End of Day 4 audit	/	/	/	/
Day 5 – 22/4/22 (Friday) 8.30am – 12.30pm	Site observation to Saremas 1 Estate P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> • Interview with workers, contractors etc. • Social aspects -SIA, management plan & implementation, workers' quarters, • Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. 	/	/		
8.30am – 12.30pm	Site observation to Suai Estate <ul style="list-style-type: none"> • Stakeholder consultation with affected communities surrounding the estate • Land titles user rights • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone 			/	/
12.30pm – 2.30pm	Lunch Break / Friday prayer	/	/	/	/
2.30pm –3.00pm	Continue assessment at respective site	/	/	/	/
2.30pm –4.00pm	Audit Team Discussion	/	/	/	/
4.00pm – 5.00pm	Closing meeting	/	/	/	/

Note: Please note that the Audit Plan merely serves as a guide and there may be changes as the audit progresses

RSPO PUBLIC SUMMARY REPORT

Attachment 3

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

Principle 1: Behave ethically and transparently

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

Clause	Indicators	Comply Yes/No	Findings
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	Yes	Saremas 1 CU had continued to maintain a comprehensive system for making documents specified in the RSPO P&C are made available to the public. Records of complaint and grievances were made available. Details of complaints and grievances for Suai and Saremas 1 Estates were recorded in the Complaint Form, Request Form and Public Information Request (PIR) Form which were sighted by the auditor.
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	Yes	Saremas 1 CU (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 involving employees, translator of employees' colleagues is applied for a better understanding of information and training purposes.
	1.1.3 (C) Records of requests for information and responses are maintained.	Yes	Saremas 1 CU had continued to maintain a comprehensive system with respect to requests for information and responses. Request Form submitted by the stakeholders or other interested party who had viewed / obtained document related to RSPO was kept appropriately in the 'Consultation/Communication' files. Record of visitation by government agencies such as DOE and DOSH were also maintained.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	Yes	The Consultation and Communication Procedure was established and prepared by the RSPO Unit of PPB Oil Palms Bhd. This procedure is used by the CU in handling internal and external communications. The CU used internal communication techniques, such as morning assembly, internal circulars and memos, notice board and posters, suggestions boxes and complaint forms. External communication was mainly carried out via email, Public Information Request (PIR), complaint and grievances form and requisition form.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	Yes	The current list of contact and details of certain stakeholders and their nominated representatives at Saremas 1 CU were available. A review of the Stakeholders lists showed relevant NGOs including SADIA and WWF were included. Government agencies, including the Sarawak Forest Department (SFD) and Sarawak Forestry Corporation (SFC) were also included.
1.2 The unit of certification commits to ethical conduct in	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	Yes	Saremas 1 CU has developed and implemented Code of Ethical Conduct where the company implemented the integrity, respect & responsibility, enterprise and 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

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
all business operations and transactions.			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. The policy comprised on the event of non-compliances with the policy, it will impose penalties and lead to disciplinary actions. Besides that, the contractors and suppliers were sign on the letter agreement where Business Codes of Ethics Conduct has outlined in the agreement. Briefing of the COBC to all workers was conducted via morning muster. It is also being explained during the induction course for the newly arrived workers.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	Yes	A system to monitor compliance is available. All written agreements (FFB Suppliers) known as "Akur Janji dan Persetujuan Bersama" was sampled at Saremas 1 CU contain a clause on no child [para i], forced and trafficked labour [para ii]. The overall ethical business practice was regularly monitored through the internal audit conducted by the sustainability team. Based on the Code of Business Conduct, it explains where to get guidance, raising a concern or reporting a violation. This is being brief to the worker during morning muster and internal/external stakeholder meeting.

Principle 2: Operate legally and respect rights

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

Clause	Indicators	Comply Yes/No	Findings
2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1 (C) The unit of certification complies with applicable legal requirements.	No	It was evident that Saremas 1 CU continue to comply with most of the applicable legal requirements. However, based on interview and documentation review at Saremas 1 Estate, 1 of the contractor workers was found to work using the other estate work permit. Therefore, NCR was raised against the indicator as MAR 012022.
	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 Saremas 1 CU. The document reviewed by the Sustainability Unit and dated in Jan 2022. 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. The Saremas 1 CU was tracking any changes to applicable law and had appointed the ESH Manager (Sarawak) as the person responsible to monitor any changes to the law and to cascade those changes to all sites.
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these	Yes	The Estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the estates, during the field inspection by the auditor confirmed that they were clearly

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	legal or authorised boundaries.		marked and maintained.
2.2 All contractors providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.1 A list of contracted parties is maintained.	Yes	The general stakeholder lists dated in Apr 2022 for Saremas 1 Estate, Suai Estate and Saremas 1 Palm Oil Mill were available, maintained and updated. The list of stakeholders includes suppliers, contractors, government agencies/service provider, neighboring estates NGO's and local communities. The list of stakeholders also listed the internal parties such as workers representatives, checkroll employees and also contractor employees.
	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	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements as verified through Online Vendor Registration (OVR) and the Vendor Code of Business Conduct (VCOBC) which apply to all contractors for due diligence and meeting legal requirements. Evidence of legal due diligence of all contracted third parties, service providers and labour contractors, were clearly stated in contract between Wilmar and all contractors.
	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	<i>Saremas 1 POM</i> - All contracts, including those for FFB supply, contain specific clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection as verified through Online Supplier Registration (OSR) and the Supplier Code of Conduct (SCOC) which apply to all contractors for due diligence and meeting legal requirements. Evidence was clearly stated in contract between Saremas 1 POM and all contractors.
2.3 All FFB supplies from outside the unit of certification are from legal sources.	2.3.1 (C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> • Information on geo-location of FFB origins. • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license 	Yes	The evidence of currently document is available in the 'Summary of Geo Location for FFB Supplier. At present the mill only possessed the valid MPOB licenses for all the directly source FFB as verified by the auditor.
	2.3.2 For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	Yes	Sighted record at Saremas 1 POM for the indirectly source of FFB in the file Summary of Geo Location for FFB Supplier: <ol style="list-style-type: none"> a) Information on geo-location of FFB origins (latitude longitude) of the Outside Supplier. b) Maps of Location all the Outside FFB Supplier

RSPO PUBLIC SUMMARY REPORT

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	(Remote) Saremas 1 CU estates continued to be committed to long-term economic and financial viability. The estates had management plans in their current year's budgets and projections. The annual budgets and projections were prepared on an annual basis before the end of current year. The yearly budget and projections where the cost of production was reviewed annually and compared against expenditure for each year was an on-going process. The parameters monitored remained essentially unchanged and included Capital (CAPEX) and Operating costs. The operating expenditure included expenditure for Replanting, Mature and Immature Oil Palm upkeep, Administration cost, Housing and Machinery upkeep, allocation for sustainability implementation (environmental, social, occupational safety and health), infrastructure development (roads, etc.), and training etc.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	Yes	The annual replanting programme for Saremas 1 CU was projected for a minimum of five years with yearly review and it was made available for auditors' review during audit.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	Yes	The management review for Saremas 1 CU was conducted independently. For Saremas 1 & Suai Estate in Dec 2021, and Saremas 1 POM in Feb 2022. Generally, the RSPO system has been maintained in good order as per requirements of RSPO MYNI 2019 Standard. The management review meeting was attended by AGM, Sustainability Teams and all the estate/mill managers. It was chaired by Assistant General Manager. Among the management review were discussed are: 1. Minutes/actions of previous meeting 2. RSPO/RSPO SC certification status 3. Results of internal audits 4. Status of preventive and corrective actions 5. Customer feedback 6. Changes affecting policy 7. Recommendations for improvement 8. Any other business (A.O.B) Management has transparently addressed the continuous suitability, adequacy, and effectiveness of the requirements for effective implementation of RSPO.
3.2 The unit of certification regularly monitors and reviews their economic, social and	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 management documents in relation to environmental plans and impact assessments implemented by the CU were made available and maintained at all audited operating units. The documents among others as listed below; Among the documents were: Social Impact Assessment, Management Plan on Social Impact Assessment – FY2022, and Environmental Aspect Impact – FY 2022.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	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.
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	Saremas 1 CU had in place the mechanism to check consistent implementation of procedures. Saremas 1 and Suai Estate had lists of SOPs and monitored good agricultural practices as per SOPs by on-site visits, inspections and discussions with relevant personnel and by conducting Assessments and audits like Internal Audits, Agronomist visits and by RSPO Audits. The operating procedures are appropriately documented, consistently implemented and monitored in Saremas 1 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.	No	Plantation Head, Assistant General Manager, Group Manager (Estates), Mill Support Team, Safety & Sustainability Team and Eco Management Unit (EMU) to inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements. Operating units visited maintain all records of monitoring and available for review. checklists were available and being used by the estates and mill for operations, health and safety monitoring, workers' welfare and environmental issues. However, the mechanism to check consistent implementation of procedures/guidelines "Senarai Semak PPE dan Peralatan Kerja" was not in place. The harvesting tools i.e. sickle, sharpening stones was not provided free of charge to harvester as per procedure. Based on inspection at general store Saremas 1 Estate, sighted harvesting tools i.e. sickle, sharpening stones, harvesting machete was not available as a stocks/inventories. Supported with the interview session at B004 Harvesting Operation at Saremas 1 Estate, workers mention their buy their own harvesting tools i.e. sickle, sharpening stones, harvesting machete. Meanwhile, harvesting machete was not listed in the procedure as importance/appropriate tools for harvester to cutting the fronds/bunches stalk. As a result, Major (Upgraded) NCR DA 01 2022 was raised.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	Yes	Operating units visited maintain all records of monitoring and available for review. checklists were available and being used by the estates and mill for operations, health and safety monitoring, workers' welfare and environmental issues.
3.4 A comprehensive Social and	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory	Yes	The SIA Assessment Report for Saremas 1 CU entitled "Scoping SIA Saremas 1 and 2, Segarmas and Kaminsky Estates" was prepared in 2008. a) The report was prepared with the participation of the relevant stakeholders, among

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
<p>Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>	<p>methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.</p>		<p>others the estate workers and the neighbouring long-house communities.</p> <p>b) It was conducted in 2008 by Petra Meekers, Independent Sustainability Advisor, and remains the baseline for socioeconomic data within the Saremas Group which includes the profile of each individual estate and mill and its stakeholders, including the identification of positive and negative social impacts.</p> <p>The assessment for replanting in 2019 was prepared in May 2019 and a report has been made available during the audit,</p> <p>a) All the social issues were assessed and recorded in minutes of meeting “Community Based Development Committee (CBDC) no.1, 2019”, in May 2019.</p> <p>b) Reminder to local community and related stakeholders that if there any issues arise to inform the CU. The replanting issues had also been discussed in Social Welfare Committee meeting in Nov 2016 at Saremas CU as to assess an impact to workers.</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>Yes</p>	<p>For Saremas 1 CU, the SIA and EAI reports separated. Significant Environmental Aspect and Impact (EAI) mitigation methods was implemented from EAI Evaluation Form. Those activities evaluated as significant were then monitored using the management control and mitigation measure established for each activity where the significant impacts occurred. The EAI assessments had included the identification of aspects and impacts from resulting from the POM and estate operations.</p> <p>EAI for Saremas 1 POM has been updated and reviewed on 16/03/2021 regarding Construction of New ESP System. The EAI specific impacts identified include smoke emissions, noise levels, EFB management, Biogas and ESP System. Data were collected and analysed for compliance with relevant regulations and further actions needed were documented and implemented. There are no significant changes from the current EAI established practice. Due to no changes identified in the mill operation, therefore no timetable for any change is required.</p> <p>Environmental aspect impact assessment for estates has been updated and reviewed in Apr 2022 regarding building construction. The aspect impacts assessments were conducted to cover all estates operation such as upkeep immature & mature areas, harvesting, FFB collection, EFB Mulching and Decanter Cake application, chemical storage and receiving, diesel and patrol transportation, maintenance of vehicle and equipment’s, scheduled wastes, buildings construction, water catchment area, OP nursery, riparian management, etc. the development of the EAI has been carried out through various method such as:</p> <ul style="list-style-type: none"> • Consultation with estate management • Estate site visits • Consultation with internal/external stakeholders such as from Govt. agencies, neighboring estates, local villagers, suppliers and contractors.
	<p>3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated</p>	<p>No</p>	<p>The environmental management and monitoring plans were developed based on the impact identified in the EAI. Those activities evaluated as significant were then monitored using the management control and mitigation measure established for each activity where the</p>

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	regularly in a participatory way.		significant impacts occurred. The management has periodically reviewed the implementation and effectiveness of the established program. During mill visit, the EAI was used as guide and no discrepancy found. The person in charge and the control required were properly recorded in the management plan. At Suai and Saremas 1 Estate, field activities that includes fertilizing, spraying, transportation of FFB, garbage disposal, landfill management, road maintenance, wildlife and land conservation activities. The mitigation measures were continued to be implemented to minimise the negative impacts. So far, no issues related to environmental has been highlighted during stakeholders meeting. However, the social management and monitoring plan was not fully implemented, reviewed and updated regularly in a participatory way. Therefore, NCR was raised against the indicator as MZK 01 2022.
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 doc. and made available to the workers and their representatives where applicable.	Yes	There were several documents related to employment procedures, whether local or foreign established and maintained at Saremas 1 CU. For matters related to termination of employment and retirement, these are contained in employment contracts. Clause 2 of the employment contract states that retirement age for workers is 60. These documents are available to workers and their representatives.
	3.5.2 Employment procedures are implemented, and records are maintained.	Yes	Employment procedures were implemented, and records were maintained. Audit team has verified all new recruitment workers from Indonesia through personal file by employment number, name of employee, employment contract, offer letter, passport consent form and others.
3.6 An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	No	The hazard identification, risk assessment and risk control (HIRARC) procedure has been established. Saremas 1 CU have conducted the risk assessment on all its operation as well as determining their control measures. However, in Saremas 1 POM, the HIRARC of risk control under appropriate personal protective equipment (PPE) i.e. approved chemical respirator with multigases cartridge, safety goggles were not monitored and assessed to the workers in handling of chemical at Biogas Plant, Boiler Plant etc. And, in Saremas 1 and Suai Estate, the HIRARC of risk control under appropriate PPE i.e. safety shoe was not monitored and assessed in the mitigation plans and procedures to tractor driver to cover all potentially hazardous machine operations was not properly done. Therefore, Major NCR DA 02 2022 was raised.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	Yes	Occupational Health and Safety Policy for Wilmar International Limited has been established for new revision and endorsed by the Executive Director & Chief Sustainability Officer in Mar 2019. The policy had been communicated to all levels of the organization through briefings and also being displayed prominently in Bahasa Malaysia and English on notice boards at mill and estate office and Muster Ground. During interviews with the workers and staff during the site visit estate field operation, workshop, office compound, workshop, laboratory, engine room, boiler house revealed that the employees had been briefed and understood the policy. At Saremas 1 CU on the OHS management plan has established for 2021/2022 to addressed issues related to hazards and risks, legal register and its requirements for

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
			compliance, OSH awareness and training program, accident and emergency procedures, treatment of illness/injury during the job, use of PPE, OSH Committee meetings, LEV inspection, vehicle and machineries programme inspection, etc. Generally, the OSH plans were acceptable. And appropriate trainings were also conducted.
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.	No	A documented program that provided training for all staff, workers, Scheme Smallholders and outgrowers which took into account gender-specific needs, and which covered applicable aspects of the RSPO P&C was available on both estates and S2POM. Regular assessments of training needs were prepared by HR Department and transferred down to the estates and mills for implementation. Training needs are formalised using <i>training needs assessment form</i> . Training needs identification matrix has been established with target dates for the training to be conducted. However, certain applicable aspects of RSPO P&C were not understand by the workers and estate management and includes assessments of training. Based on the interview and documentation review, no assessments of training have been conducted for certain applicable aspect of RSPO P&C such as: <ol style="list-style-type: none"> 1. Payslip detailing 2. Vacation leave pay 3. Annual leave Therefore, major NCR raised as MAR 06 2022.
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	Yes	Records of training are maintained, which is accessible to all staff, workers, scheme smallholders and outgrowers, where appropriate on an individual basis at Saremas 1 CU.
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	Yes	The auditor sighted CPO and PK production record, weighbridge report, dispatch record and training record was up to date and well maintained. Sighted last training on SCCS for internal stakeholder in Mar & Nov 2021, while the trainings for contractors were carried out in Mar 2021 & Mar 2022.

RSPO PUBLIC SUMMARY REPORT

SUPPLY CHAIN REQUIREMENTS FOR MILLS

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.1	<p>Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, the inly MB Module is applicable.</p>	N/A	This is not applicable since this mill is Mass Balance.
3.8.2	<p>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 3rd party certified supply base.</p>	Yes	Saremas 1 POM received certified FFB from own Estate which is Saremas 1 Estate, Suai Estate and uncertified FFB from surrounding small growers & small holders. Thus, Saremas 1 POM has qualifies for the Mass Balance chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products. Details as in Table 3 of this report.
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	Yes	The information has been made available during the conduct of audit. The values are as provided in Table 4 in this report.

RSPO PUBLIC SUMMARY REPORT

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings																																				
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).	Yes	Name: Saremas POM I - PPB Oil Palms Bhd - Wilmar Country: Malaysia. Member Category: Oil Mill Core product: Palm Oil																																				
3.8.5	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). • Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard. <p>The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	Yes	<p>The auditor sighted CPO and PK production record, weighbridge report, dispatch record and training record was up to date and well maintained. Sighted last training on SCCS.</p> <p>The appointment letter dated in Jan 2021 the Mill Manager & the Chief Clerk as PICs for SC. Training was conducted in Mar & Nov 2021 by internal appointed trainers, for internal personnel related to SCCS Requirement, and in Mar 2021 & Mar 2022 for contractors.</p> <p>Saremas 1 - (RSPO Supply Chain Certification Procedure describing the procedures on the following activities related on its supply chain certification standard required by the RSPO. The Procedure was sighted and found that all elements were covered to include the following</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 5%;"></th> <th style="width: 45%;">Elements</th> <th style="width: 5%;"></th> <th style="width: 45%;">Elements</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td>Mill Supply Chain Definition</td> <td style="text-align: center;">9</td> <td>Registration of Transactions</td> </tr> <tr> <td style="text-align: center;">2</td> <td>Management Representative</td> <td style="text-align: center;">10</td> <td>Claims</td> </tr> <tr> <td style="text-align: center;">3</td> <td>Internal Audit</td> <td style="text-align: center;">11</td> <td>Training</td> </tr> <tr> <td style="text-align: center;">4</td> <td>Purchasing and Goods In</td> <td style="text-align: center;">12</td> <td>Complaints Procedure</td> </tr> <tr> <td style="text-align: center;">5</td> <td>Sales and Goods Out</td> <td style="text-align: center;">13</td> <td>Management Review</td> </tr> <tr> <td style="text-align: center;">6</td> <td>Despatch</td> <td style="text-align: center;">14</td> <td>Supply Chain Model – Mass Balance</td> </tr> <tr> <td style="text-align: center;">7</td> <td>Outsourcing</td> <td style="text-align: center;">15</td> <td>GHG tabulation - RSPO certified Palm Oil Mill</td> </tr> <tr> <td style="text-align: center;">8</td> <td>Record keeping</td> <td style="text-align: center;">-</td> <td>Appendix A</td> </tr> </tbody> </table>		Elements		Elements	1	Mill Supply Chain Definition	9	Registration of Transactions	2	Management Representative	10	Claims	3	Internal Audit	11	Training	4	Purchasing and Goods In	12	Complaints Procedure	5	Sales and Goods Out	13	Management Review	6	Despatch	14	Supply Chain Model – Mass Balance	7	Outsourcing	15	GHG tabulation - RSPO certified Palm Oil Mill	8	Record keeping	-	Appendix A
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3.8.6	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> • Conforms to the requirements in 	Yes	<p>S1POM which is follow the RSPO Supply Chain Certification Standard Revision 2020 requirements. Audit report has also been established. The audit was conducted against the RSPO Supply Chain Certification Standard Revision 2020 requirements. RSPO internal audit for 2020 was conducted in Nov 2020 by the appointed internal auditors. The internal audit has followed the requirements in the RSPO Supply Chain Certification</p>																																				

RSPO PUBLIC SUMMARY REPORT

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <ul style="list-style-type: none"> • Effectively implements and maintains the standard requirements within its organisation. • Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports. 		<p>Standard and the RSPO Market Communications and Claims Documents. There are 0 Minor NCR were raised by auditor. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor.</p> <p>RSPO internal audit for 2021 was conducted in Nov 2021 by the internal auditors' team. The internal audit has followed the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. There are 0 Minor NCR for Both Internal Auditor were raised by auditor. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor.</p> <p>Documented procedure has defined management review will be conducted once a year. Management review meeting for 2020 was carried out in 14/12/2020, while in 2021, it was conducted in 13/12/2021 (combine RSPO, RSPO SCCS and MSPO).</p> <ul style="list-style-type: none"> • Internal audit 2020/2021 – 0 NCR (SCCS only) • Customer feedback – data analysis show result from customer survey (i.e. RSPO-CSPO related to meeting the contract volume, timely delivery, dispatch documentation) result achieved. • Previous meeting – was highlighted (past MR) • Changes – There is no significant changes accept transfer of Assistant Manager. • Recommendation for improvement – improve the established system
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>Saremas 1 POM had continued received FFB supply from own company estate namely Saremas 1 and Suai estate and Outsider Crop consist of surrounding small growers (5) & small holders 32 totaled of 37 suppliers. The validity of the certificate of the supplier has been checked accordingly. Sighted sample FFB consignment note for Suai and Saremas 1 Estate. Among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight, quantity, unique identification number. Monitoring records titled as <i>“Quarterly Mass Balance Report</i>, has recorded the tonnage of certified FFB and its supplying estate. Verified through Saremas 1 POM weighing system called <i>‘Weighbridge.net’ and random sample of weighbridge ticket from.</i></p>

RSPO PUBLIC SUMMARY REPORT

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single-documents or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documentation and specification documentation):</p> <p>a) The name and address of buyer;</p> <p>b) The name and address of the seller</p> <p>c) The leading or shipment/delivery date;</p> <p>d) The date on which the documents were issued;</p> <p>e) RSPO certificate number;</p> <p>f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations);</p> <p>g) The quantity of the products delivered;</p> <p>h) Any related transport documentation</p> <p>i) A unique identification number</p>	Yes	<p>Documented procedures related to sales and goods out were sighted and found adequate. Based on verification during the audit, S1POM has deliver certified materials to end buyer such as Bintulu Edible Oil Sdn Bhd Therefore, following are sample of certified CPO & PK sales which comply to standard requirement. The document has include:</p> <ul style="list-style-type: none"> • The name and address of buyer; • The name and address of the seller • The leading or shipment/delivery date; • The date on which the documents were issued; • RSPO certificate number; • A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation • A unique identification number

RSPO PUBLIC SUMMARY REPORT

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>There was no outsource activities except for the CPO and PK transportation involving vendors i.e.</p> <p>a) Syarikat Pengangkutan Lean Soon Hung (CPO)</p> <p>b) Tong Yen Transport Sdn Bhd (CPO and PK)</p> <p>c) Farjaya Transport & Service (CPO and PK).</p> <p>The agreement documents were available and communication on the RSPO supply chain requirement were transacted to them. Record of training has been conducted to them on yearly basis.</p>

RSPO PUBLIC SUMMARY REPORT

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.10	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	Yes	List of contact person for both transporters were made available and up-to-date. Sighted Stakeholder list dated January 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	No new contractors used and will be used in the future for the processing or production of RSPO certified materials.
3.8.12	The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	Yes	Sighted CPO and PK delivery note, weighbridge ticket, production data, internal audit and management review records were found up-to-date. All records related to RSPO SC were maintained for a minimum for 2 years refer to RSPO Supply Chain Certification Procedure S1POM-RSPO-SCC dated 1 Sep 2020. Sample CPO dispatch note since Jan 2015 until to date was available and well maintained.
	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 S1POM-RSPO-SCC.
	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	NA since this mill is a MB Mill
	iv) For Mass Balance Module, the mill: a. shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by	Yes	Randomly selected weighbridge tickets issued during March 2020 – March 2022 by Saremas 1 POM for delivery of RSPO-certified CPO & PK were verified and found to have indicated all the required information including the status of the products (RSPO MB). Saremas 1 POM had continued to keep record and balances of all receipts of RSPO-certified FFBs and deliveries of RSPO-certified CPO and PK on a three-monthly basis in the table ' <i>Quarterly Mass Balance Report</i> '.

RSPO PUBLIC SUMMARY REPORT

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>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	<p>Saremas 1 POM processed all the received crop & their processing output will be based on their actual Oil Extraction Rate (OER) as well as Kernel Extraction Rate (KER). These figures were monitored on daily & monthly basis by the mill using the prepared template (e.g. Monthly Production Report – Physical Movement) to ensure their accuracy as well as monitoring of their ongoing performance.</p>
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	<p>Not applicable since Saremas 1 POM is Mass Balance Mill.</p>
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 more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p>	Yes	<p>The registration of transaction being carried out by Wilmar Marketing subordinate using the RSPO Member ID. The Mill received copy of transaction input to the system on monthly basis based on contract summary (buyer weight being put in).</p>

RSPO PUBLIC SUMMARY REPORT

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	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		
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	Yes	Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. Saremas 1 POM has not use RSPO corporate logo as well as trademark logo.

Principle 4: Respect community and human rights and deliver benefits

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

Clause	Indicators	Comply Yes/No	Findings
4.1 The unit of 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 Group Policy Titled <i>Human Right Policy</i> is available. The policy was signed by both Chairman and CEO of Wilmar. The key aspects mentioned in the content are; a) Labour rights, which included the freedom of association, no forced or bonded labour, no child labour and providing conducive working conditions. b) Indigenous / Local Communities Rights, which included the respect land tenure rights, commitment to obtain free prior / informed consent from local communities, commitment to open, transparent, fair and equitable conflict resolution. There is also a new policy name No deforestation, No Peat, no exploitation Policy dated November 2019 and there is a statement 'prohibiting retaliation against Human Rights Defenders'. The recent briefing made to workers in to Saremas 1 POM was conducted in Feb 2022, while in a Saremas 1 Estate and in Suai Estate, in Mar 2022. The policy had a translation in Bahasa Malaysia. It is displayed on a notice board in office and at muster ground.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	Yes	It has been verified that the Saremas 1 CU does not instigate violence or use any form of harassment in the complex. a) Interviews with the local, woman and foreign workers at the POM and Estates revealed that there is no evidence of harassment based on race, gender or national origin or any other factors. b) As shown in the employment letter, there are no differences in the terms of employment between foreign and local workers or between male and female workers and no specialty for both.

RSPO PUBLIC SUMMARY REPORT

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>In the event of a dispute, the CU will manage it through the “Dispute and Grievances Procedure”. Additionally, there is also the “Whistle Blowing Policy”.</p> <ul style="list-style-type: none"> a) 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. b) If the proposed solution was rejected, the dispute will be brought for third party arbitration. c) Grievance or dissatisfaction and request for services on the part of the employees can be conveyed through the “<i>Borang Aduan (Complaints Form)</i>” and the “<i>Borang Permohonan (Request Form)</i>”. d) Wilmar Group Whistleblowing Policy ensures anonymity. Annex 1 of the Policy contains the Whistle Blower Complaint Response where the complainant has the option of remaining anonymous by not revealing his/her identity.
	<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>Based on interview with stakeholders, it can be concluded that the system was understood by the affected parties.</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>No</p>	<p>Saremas 1 CU keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and evidenced by communication letters sighted by the auditor. Outcome of complaints/grievance and requests by stakeholders were also communicated to them as verified in the minutes of stakeholder’s meeting held in Jan and Dec 2020 at Saremas 1 conference room, meeting with contractors held in Feb 2022 and Worker Social and Welfare Committee meeting held in Nov 2021 (Saremas 1 estate). During onsite audit, the auditor verified on the grievance made by 1 of the employees interviewed during remote audit. The grievance on the broken housing was solved by the management. Therefore, NCR on remote audit, MAR 01 2021 has been satisfactorily closed.</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>In the event of a dispute, the CU will manage it through the “Dispute and Grievances Procedure”. Additionally, there is also the “Whistle Blowing Policy”.</p>

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
4.3 The CU contributes to local sustainable development as agreed by local communities.	4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.	Yes	Based on records, interviews and site verification, contributions made to local development were made based on the requests from the local communities
4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.	4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available.	Yes	The copies of legal ownership of the land for both Saremas 1 & Suai Estates were verified. The land was bought from Sarawak Government in 1983 and 1985, respectively. It has been confirmed during the sale of the land that there was no history of customary land tenure or recognized NCR land. These were confirmed with the Miri Lands and Survey.
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	Yes	Evidence of agreement-making processes and negotiated agreements detailing the FPIC process are available at Saremas 1 CU which included resolutions for the following disputes. Details were made available in the confidential version of this report. <u>Dispute No. 1:</u> A group of 5 Ibans were claiming for NCR and have submitted a demand for compensation from Saremas CU. Following consultations between the parties, compensation to the Iban community was mutually agreed where 490 acres of land would be distributed to 3 longhouses.
	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, incl. info on the steps that are taken to involve them in decision making.	Yes	<u>Dispute No. 2:</u> This claim made by a group of Penans from Kg Ugos who claim NCR over parts of land. When overlaid on Saremas map, the areas involved approximately 22,000 ha overlapping with Saremas 1 & 2, and Segarmas Estate. The Penans have based their claim on Gazette Unos 1954 and Gazette Menang 1980. Court case ongoing.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.	Yes	As above.
	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	Yes	
	4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).	Yes	At Suai Estate, it was mentioned in the previous audit that three individuals from the neighboring land sought clarification on the actual boundary between Block 106 Suai Estate that separates oil palm trees that they planted, and those planted by the estate. Hence, in Nov 2016, a boundary verification exercise was carried out in the presence of the 3 landowners and 5 estate representatives. And the boundary pegs by Land Survey Department were located and identified using GPS coordinates, which both parties acknowledged and agreed to abide by. Since the audit in 2020 until the current SA audit, there is no more boundary dispute claimed by the neighboring stakeholders and any land claim on Saremas 1 CU land.
	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 at the Saremas 1 Estate, Saremas 1 Palm Oil Mill and Suai Estate 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.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	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	At present, there was no existing land claim and dispute involving Saremas 1 plantation. Nevertheless, in the two land disputes mentioned in the previous audit which had been resolved, there was evidence, that the claimants were able and free to choose their own representatives to represent their claim and interests in the land disputes.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	Yes	As in 4.4.2. There was evidence to show that there was proof of legal acquisition of land title by Saremas Sdn Bhd, and that compensation have been made to the two groups of claimants following negotiations and consultations. For the Recertification Audit 2020, auditor has verified the documentation regarding the claim made by the stakeholder above and currently the Saremas CU waiting the updated information from the stakeholder.
4.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.	4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	Yes	Based on Social Impact Assessment (SIA) Report for Saremas 1 CU and land titles, there was no new planting established on local peoples' land. It has been verified that the land is legitimately owned by Wilmar Saremas 1 CU since 1983 and 1985. The audit team had confirmed that there were no land issues related to previous owners.
	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Wilmar Saremas 1 CU since 1983 and 1985. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no new issues regarding land with villagers, local community and neighboring estate.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	<p>4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to ops planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during the nego, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p>	<p>Yes</p>	<p>As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Wilmar Saremas 1 CU since 1983 and 1985. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no new issues regarding land with villagers, local community and neighboring estate. It can be concluded that there was no evidence of any new land clearing and new land dispute at Saremas 1 CU.</p>
	<p>4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p>	<p>Yes</p>	<p>As above.</p>
	<p>4.5.5 Evidence is available that the affected commnt. and rights holders have had the option to access to info and advice that is independent of the project proponent, concerning the legal, economic, env. and social implications of the proposed operations on their lands.</p>	<p>Yes</p>	<p>As above.</p>

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	Yes	As above.
	4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	Yes	There were no new lands acquired for plantation and mills after 15/11/2018. The current operation area including mill and estates as per stated in the land title.
4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with thru a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative	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 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.</p> <ul style="list-style-type: none"> a) 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. b) 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. <p>The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.</p>
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	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.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
institutions.	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 Saremas 1 Estate. 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	There are currently no existing land disputes. As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Wilmar Saremas 1 CU since 1983 and 1985. 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.
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, the 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.
	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	Yes	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. There were no new issues regarding land with villagers, local community and neighboring estate.
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Wilmar Saremas 1 CU since 1983 and 1985. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no new issues regarding land with villagers, local community and neighboring estate.
4.8 The right to use the land is demonstrated	4.8.1 Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Wilmar Saremas 1 CU since 1983 and 1985. All the related documentation regarding the land acquisition was kept in Wilmar HQ Office, Sandakan and the copy in the estate was verified by the auditor. There were no new issues regarding land with villagers, local community and neighboring estate. There are currently no existing

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.	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 doc. process of FPIC.		disputes.
	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	There are currently no existing land disputes. Available records and evidence showed that there was proof of legal acquisition of land title by Saremas CU, and at the time of the audit, no land claim or FPIC issues were raised by local communities.
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant reqs.	Yes	There are currently no existing land disputes. Available records and evidence showed that there was proof of legal acquisition of land title by Saremas CU, and at the time of the audit, no land claim or FPIC issues were raised by local communities

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	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	There are currently no existing land disputes. Available records and evidence showed that there was proof of legal acquisition of land title by Saremas CU, and at the time of the audit, no land claim or FPIC issues were raised by local communities. The requirement for map of disputed land is not applicable.

Principle 5: Support smallholder inclusion

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

Clause	Indicators	Comply Yes/No	Findings
5.1 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	Yes	During the audit, it was verified that the current and past prices for FFB are being displayed at the notice board near the Saremas 1 POM weighbridge.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Yes	A meeting, "Community Base Development Committee Meeting" between Saremas 1 POM and FFB suppliers was held in Jan 22. Among the agenda for discussion was "Price Mechanism" which included explanation on the method of FFB price calculation for suppliers.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Yes	At Saremas 1 POM, fair FFB pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base.
	5.1.4 (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	Yes	At Saremas 1 POM, there are records kept of parties, including women and independent representative organisations assisting smallholders involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	Yes	There is evidence that contracts entered into with FFB suppliers, CPO transporters and other Contractors are fair, legal and transparent. Among others, the contracts are dated, with clear provisions on contract duration, scope of services, payment of fee, obligation and undertaking of parties, provisions related to default and termination, rights and obligations upon termination, clause on dispute, etc. Annexes of the FFB supplier and transporter contracts specify method of FFB pricing calculation, schedule of transportation rates and transport rate adjustment mechanism, respectively.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	Yes	Interview with FFB suppliers/smallholders confirmed the agreed payments are made in a timely manner (not later than 30 days) and receipts specifying price, weight, deductions and amount paid are given.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	Yes	Weighing Equipment in Saremas 1 POM has been calibrated on a yearly basis using Metrology Corporation Malaysia Sdn Bhd last made dated Mar 22.
	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 (community Based Development committee) meeting in Jan 22 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	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. Wilmar Group Whistleblowing Policy ensures anonymity. Annex 1 of the Policy contains the Whistle Blower Complaint Response where the complainant has the option of remaining anonymous by not revealing his/her identity.
5.2 The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.	5.2.1 The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	Yes	Wilmar supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. Sighted that latest Stakeholder (community Based Development committee) meeting in Jan 22 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.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	5.2.2 The unit of certification develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	Yes	Wilmar supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. Sighted that latest Stakeholder (community Based Development committee) meeting in Jan 2022 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.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	Yes	Not applicable.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	Yes	Sighted that latest Stakeholder (community Based Development committee) meeting in Jan 2022 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.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	Yes	Currently Wilmar has created a system to trace their stakeholder around their estates. But so far growers and smallholders in Sabah are willing to join the WAGS to get certification but for smallholder in Sarawak doesn't want to involve because of financial restriction. But Wilmar do have a report and always publicly available in their website.

Principle 6: Respect workers' rights and conditions

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

Clause	Indicators	Comply Yes/No	Findings
6.1 Any form of discrimination is prohibited.	6.1.1 (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	Yes	The Equal Opportunity Policy signed and endorsed by both Group Plantation Head and the Group CSR Head. The policy is publicly displayed in the visited estates and mill. Amongst others the policy in a simplified version endeavors to; <ul style="list-style-type: none"> a) Comply with all legislation dealing with discrimination/promotion of equality. b) Establish/maintain a working environment/employment being treated equally c) Ensure mechanisms in place for any complaints of discrimination from employees d) Ensure that partnership arrangement have similar policies of such e) Periodically review the policy to ensure it remains relevant/applicable.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
			The Policy is affected to mainly the employees of both gender and also employees of contractors as service provider to the estates/mill. The HR Department is responsible for the effective enforcement of the Policy.
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against incl. charging of recruitment fees for migrant workers.	Yes	Apart from the Equal Opportunity Policy which states that all employees shall be treated equally, there is also no evidence that there has been any form of discrimination against any employee, or group of employees.
	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	Based on interviews with the estate and mill management including documentation review (interview assessment and medical report), recruitment selection, hiring and promotion are based on suitable job vacancies, experience, qualification/skill and medical fitness appropriate for the job. Interview of candidates will be done by Manager and the Assistant Managers where an evaluation form is filled up to determine the suitability of the candidate. These documents are contained in the workers' personal files. Among the sampled documents sighted belonged to the following workers as per indicator 6.2.1.
	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	Currently, there was 2 pregnant women at Saremas 1 as verified with medical assistant and during interview session with women workers. If there are any pregnant women found by management or informed by staff and workers, the management of estate and mill will transfer the pregnant worker to do any light job as per stated in the Social Policy states that all employees shall be treated equally. There is also no evidence of discrimination against any employee, or group of employees including pregnant women.
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	No	At the Saremas 1 POM, Gender Committee was formed since 2008, and latest Meeting has been held in Feb 2022. Among the topics covered were: <ul style="list-style-type: none"> - Rights of pregnant employees to be given alternative jobs, where appropriate, - No discrimination for getting pregnant; - Sprayers or workers who are breastfeeding will not be given jobs dealing with chemicals; - Medical consultation will be given by the estate Medical Assistant; - Domestic violence; - Sexual harassment; and - How to handle social issues, including how to lodge a complaint
	6.1.6 There is evidence of equal pay for the same work scope.	Yes	The equal opportunities policy is described within the Equal Opportunity 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. <ol style="list-style-type: none"> a) The Social Policy was displayed on notice boards in both Bahasa Malaysia and English. b) Interview with the workers' local female, migrant (Indonesia) and local male confirmed that they received equal pay for the work given. For example, mill

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
			<p>workers at all station have been paid by daily rate and the same gang also received the daily rate also.</p> <p>c) For mill and estate general workers they receive daily payment as per Minimum Wages Order Amendment 2020.</p> <p>d) Comparisons were made of sampled employment contracts and payslips of general workers from local and general workers from Indonesia. Evidence is available that sampled workers receive equal pay for equal work.</p>
<p>6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>	<p>6.2.1 (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p>	No	<p>For the Saremas Group, documentation of pay and conditions are mentioned in the workers' contract of employment. However, Agreement for contractor workers in Saremas 1 Estate i.e Bunga Pengantin not available to the workers and was not explained to them in language they understand. Working hours in the agreement was differs between office and operation and from what the workers understand. Based on interview with Bunga Pengantin employees, he did not understand on the work agreement and the agreement was not available to him. Based on interview and documentation review, there was different working hours between office and operation, lead to discrepancy in term of overtime payment. Therefore, major NCR was raised as MAR 02 2022.</p>
	<p>6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal reqs) and payroll documents give accurate info on compensation for all work performed. This includes a form of record for work done by family members.</p>	No	<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. However, there was 3 findings related to the indicator such as:</p> <ol style="list-style-type: none"> 1. Annual leave that has been taken by some workers was not paid based on the agreement. 2. Payroll documents i.e payslip and checkroll records does not give accurate information on compensation for all work performed. 3. 1 harvester was found working excessive hours. <p>Therefore, major NCR was raised as MAR 03 2022.</p>
	<p>6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p>	Yes	<p>The Saremas 1 POM has complied with legal requirements on regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p>
	<p>6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in</p>	No	<p>Housing inspections were carried out on weekly basis by members of the health and safety committee as required under Section 23(2) of the Workers' Minimum Standard of Housing and Amenities Act 1990. The inspection typically checks for cleanliness and safety of the houses. Reports of inspection were presented to the main Safety and Health Committee for information and any actions, if necessary. Visits were made to the housing complex at Saremas 1 Estate and Suai Estate. Workers at the Saremas 1 Palm Oil Mill</p>

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	<p>their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p>		<p>are housed within the Saremas 1 Estate housing complex. Housing, water supplies, medical, educational and welfare amenities are provided for all staff and workers in accordance with the Workers' Minimum Standard of Housing and Amenities Act 1990. There we 2 findings related to the indicator such as:</p> <ol style="list-style-type: none"> 1. Saremas 1 POM did not provide proper sanitation facilities i.e proper toilet at mill 2. Suai Estate did not provide proper windows at workers quarters. <p>Therefore, major NCR was raised as MAR 04 2022.</p>
	<p>6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p>	<p>Yes</p>	<p>There are five sundry shops available within the Saremas 1 CU. Prices of the necessities are determined by taking a census on the 10 most bought items and compare the prices of these goods with those sold in town. Based on this method of comparison, a ceiling price that the estate shops can fix is then determined, depending upon their respective distance from town. In addition, meetings with the sundry shop operators are held with the management at least twice a year to discuss any issues that may arise.</p>
	<p>6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a "decent living wage" is in place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following:</p> <ul style="list-style-type: none"> • An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers. • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment. • The unit of certification may choose to implement the "living wage" payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before 	<p>Yes</p>	<p>Based on pay slip verified, all sampled workers who complete the number of days offered in a month received at least minimum wages applicable, which is RM 1,100.00 per month or more. Suai Estate, Saremas 1 Estate and Saremas 1 Mill had calculated the prevailing wages and in-kind benefits for their workers. The calculation included housing, electricity, water, transport to work, sports and recreation facilities, education, childcare and healthcare. The auditor had verified the calculation and though the calculation was in line with RSPO Guidance on Calculating Prevailing Wages.</p>

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	<p>an eventual scale-up of the living wage implementation.</p> <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>6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</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>6.3.1 (C) A published statement recognizing freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p>	<p>Yes</p>	<p>All workers in Saremas 1 CU is a Permanent and full time workers and all the workers used for core work such as Harvesting, Manuring, Spraying, Milling Operation, Grading, Engine driver and workshop. There is no temporary workers and contractors use in the Saremas 1 CU. Foreign workers are full-time employees but have a contractual duration which is stipulated in their employment contracts which is 2 years for Indonesians and 3 years for other nationalities. This contract duration can be mutually extended subject to the annual work permit from the Malaysian Immigration Department.</p> <p>A written statement is available in “<i>Human Right Policy</i>”, signed and endorsed by the CEO. Sighted a briefing session made to all workers in during a muster on this subject at Saremas 1 POM in Feb 2022.</p>
	<p>6.3.2 Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p>	<p>Yes</p>	<p>There are no trade unions within the Saremas Group.</p> <p>a) However, workers are represented by Workers' Representatives who were elected from among the workers themselves. The elected workers' representatives hold their office for a two-year term and sit on the Social & Welfare Committee.</p> <p>b) The organization chart for the Saremas 1 Estate, Suai Estate and Saremas 1 POM - Social & Welfare Committee 2022 was sighted during the audit and it shows that there are 12 worker representatives was elected.</p>
	<p>6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p>	<p>Yes</p>	<p>There are no trade unions within the Saremas Group. However, workers are represented by Workers' Representatives who were elected from among the workers themselves by using votes like election.</p>
<p>6.4 Children are not employed or</p>	<p>6.4.1 A formal policy for the protection of children, including prohibition of child</p>	<p>Yes</p>	<p>The Saremas Group Child Protection Policy that stipulated, it will not employ child labour as defined by the ILO Convention, i.e. work by children under the age of 12, children under the age of 15 that prevents school attendance, and children under 18 that is</p>

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
exploited.	labour and remediation is in place, and included into service contracts and supplier agreements.		hazardous to the physical or mental health of the child. This Child Labour Policy is publicly available at the Saremas 1 Estate, Saremas 1 Palm Oil Mill and Suai Estate. There was no evidence that the estates and the mill at Saremas has employed anyone below the age of 18 years.
	6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	Yes	Auditor also verified through the contractors in the Saremas CU and confirmed there was 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.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	Yes	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	The policy protection of children is contained in Saremas Group Child Protection Policy. There was no evidence that the estates and the mill at Saremas employ anyone below the age of 18 years. The training was also given to external stakeholders during stakeholder meeting held in Feb 2022.
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	This Group policy is available the " <i>Sexual Harassment, Violence and Abuse, and Reproductive Rights Policy</i> " signed and endorsed by CEO. The policy is aimed to provide a conducive working environment that is characterized by equality and mutual respect. Records for briefing to the employees were sighted.
	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	This Group policy is available the " <i>Sexual Harassment, Violence and Abuse, and Reproductive Rights Policy</i> ", signed and endorsed by CEO. The policy is aimed to provide a conducive working environment that is characterized by equality and mutual respect i.e., the right and freedom to decide the no, range of childbirth and he right to decide on reproductive free from discrimination, forced & 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.	No	In the Saremas 1, Gender Committee have been established at the Mill and Estate levels to help disseminate awareness on issues relating to reproductive rights and need of new mothers. Awareness on reproductive rights need of new mothers are also briefed during muster and Gender Committee meetings held at each Mill and Estates. Management has assessed the needs of new mothers, but without consultation with the new mothers. Based on interview on the sampled female employee in Saremas 1 Estate, it was found that the employee did not know that adequate space and paid breaks should be provided

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
			<p>to enable mothers with infants 24 months or younger to breastfeed or express and store breast milk with privacy. The female employee currently has infant of 7 months' years old. Assessment of new mothers has not been conducted, and actions taken to address the needs have not been identified. Based on interview and documentation review, there was no assessment of new mothers has been done. Therefore, this finding categorized as recurrence and graded as major, MAR 05 2022.</p>
	<p>6.5.4 A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p>	Yes	<p>A Dispute and Grievance Procedure is available and is applicable to the Saremas Group. The purpose of this procedure is to facilitate the dispute and grievance resolution between management, growers/ millers, and employees, local communities and other affected external parties.</p> <p>The Wilmar Group also has a Whistleblower Policy where the Whistleblower Complaint Response allows the whistleblower an option to remain anonymous. The Wilmar Group's Sexual Harassment, Violence and Abuse Reproductive Rights Policy which was updated in June 2014 specifies that all reports of sexual harassment will be dealt with in a confidential and discreet manner.</p> <p>Based on the above, the various grievance mechanisms respect anonymity and protect complainants where requested, and the same were being communicated to all levels of workforce through various briefings and trainings.</p>
<p>6.6 No forms of forced or trafficked labour are used.</p>	<p>6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty to the workers for termination of employment • Debt bondage • Withholding of wages 	Yes	<p>Workers in Saremas 1 CU in Estate and Mill have entered into employment voluntarily, it was verified during the interview with workers.</p>
	<p>6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p>	Yes	<p>There is a special labour policy and procedures established known as "Recruitment of Workers". Based on interviews conducted with foreign workers, documentation review and observations made, there is evidence that the SOP is being implemented within the Saremas 1 CU.</p>
<p>6.7 The unit of</p>	<p>6.7.1 (C) The responsible person(s) for</p>	Yes	<p>Occupational Safety Health (OSH) Committee has been established together. The OSH committee organization chart for 2020 and 2021 was available. The Estate/Mill Manager</p>

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
certification ensures that the working environment under its control is safe and without undue risk to health.	H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.		is the chairman, and the Assistant Clerk/Assistant Manager is the secretary. OSH Committee meetings were held once in three months. The minutes of the meeting were made available during the audit. OSH Committee meetings confirmed that among the agenda discussed, included the following: <ul style="list-style-type: none"> ▪ Passing of previous minutes and arising matters. ▪ Accident report (Monthly Data of Mill/Estate Safety Performance) ▪ Workplace inspection ▪ Safety report and programme ▪ COVID 19 issues
	6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.	Yes	ER Teams & Accident Procedures were formed for all the identified incidences. The organization chart for the ER team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. During interviews with workers, it was noted that all workers understand regarding ERP. During site inspection at estates, it was sighted Emergency Response Plan was available at Boiler Station, Sterilizer Station, Chemical Store, Workshop, Lubricant Store etc. First aid training was conducted annually. Master list of first aid box of both estates and mill which is available at the office was checked and verified. Observed that, first aid box is well provided for all the field mandores whose involved in harvesting, manuring and spraying works. The content of first box which is held by harvesting, manuring and spraying mandore was verified. The stock of first aid box is regularly check and refill when necessary, by estate Hospital Assistant. Accident statistics were being maintained in a satisfactory manner and periodically reviewed. Accident/injury record were recorded using Lost Time Accident (LTA) metrics. Quarterly review on accident cases had been carried out during quarterly OSH committee meeting.
	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	Records of PPE issuance, and acknowledgement of receipt are maintained individually for all category of workers at mill and estates. Sighted common PPE issued included face masks respirators, goggles, safety shoes, harvesting shoes, rubber boots, nitrile/cotton gloves, apron and hard hat. In addition to basic PPE, special PPE are also provided for workers assigned to dangerous operation such as work at height and in confined space. All workers were provided with appropriate PPE where the cost is bared by the management. Interviews conducted during the site visit at the Mill and Estate showed understanding and approval from the workers that the management bares the cost of all PPEs, and the workers are entitled to valid PPE, the importance of using required PPE at all times during work and proper storage and disposal methods of PPE. Based on interview and site inspection, sighted sanitation facilities for those applying pesticides were 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. Clothing lockers are provided for mill and estate workers to change their street clothing to work clothing and vice versa at the end of their work shift. Meanwhile, during site

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
			inspection estate and mill workshop, most of the moving part and rotating machinery were installed with machine guarding and properly covered. Noted also the set of oxygen and acetylene cylinders in the workshop available with “flash back arrestors”.
	6.7.4 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.	Yes	Medical care and accident insurance is provided to all employees, both Local and Foreign workers under Employees’ Social Security Act 1969 (Act 4). Sighted the last three months’ payment (January 2022, February 2022 and March 2022) made to SOCSO on Form 8A for foreign and local workers at the POM and both estates were available for reviewed.
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	Yes	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. Form JKPP 8 for 2021 at Saremas 1 POM was submitted to DOSH timely in Jan 2022 via MyKKP System. Accident statistics were being maintained in a satisfactory manner and periodically reviewed. Accident statistics were being maintained in a satisfactory manner and periodically reviewed. Sighted accident investigation report has been conducted by OSH committee immediately after the cases occur. Sighted an action to establish the SSOP and HIRARC has been revised. Also, JKPP 6 report have been communicated to DOSH @ MyKKP System.

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

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

Clause	Indicators	Comply Yes/No	Findings
7.1 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.	7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control.	Yes	The estate continues to implement cultural / biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Although there have been no outbreaks of leaf eating pests, beneficial plants are being established along main roads and block boundaries to attract natural predators. The estates have established IPM program. The plan was reviewed on annually basis. The IPM consist of Planting Beneficial Plant, Rat Baiting Applications, and Ganoderma census. There is no barn owl box in the plantation.
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	Yes	Species referenced in the Global Invasive Species Database and CABI.org are not used in the estate.
	7.1.3 There is no use of fire for pest control unless in exceptional circumstances, i.e.	Yes	Wilmar Internal Limited had a policy of no open burning. As advocated, the estate practised Zero burning thus no use of fire for pest control. No replanting operation during the audit process.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	where no other effective methods exist, and with prior approval of gov authorities.		
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	Saremas 1 CU continued to use agrochemicals based on the Wilmar International Limited Agriculture Manual & Standard Operating Procedure for Oil Palm 3/2011 for various fields operations. The manual has included a chemical register list which indicates the purpose of usage (intended target), hazards signage, trade and generic names as well as the specific targets and the correct dosage of agrochemicals to be used. All chemicals usage was based on the "need to do basis" to enhance field operations. It was found that no Class I chemicals had been used.
	7.2.2 (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	Yes	The estate has a record of areas where pesticides had been used. Pesticides are used only when justified and areas used are recorded in store issue chits, bin cards, program sheets, SAP System (System Applications and Products in Data Processing), costing records and progress reports. Records of pesticides used by area, quantity used, hectares applied in 2021 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 continue to implement cultural / biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estate include monitoring of pest numbers and the use of triggers for initiation of control measures. Although there have been no outbreaks of leaf eating pests, beneficial plants are being established along main roads and block boundaries to attract natural predators. The estate has established IPM program. The plan was reviewed on annually basis. The IPM consist of Planting Beneficial Plant, Rat damage census, and Ganoderma census.
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	Yes	There was no evidence of any prophylactic use of pesticides in Oil Palm planted area. Suai and Saremas 1 Estate had complied with the requirement as per Chapter 8 of Wilmar International Limited Agriculture Manual & Standard Operating Procedure for Oil Palm 3/2011. As per Chapter 8, prophylactic use of pesticides was only in the Oil Palm Nursery and only for Fungicides and not for any other pesticide.
	7.2.5 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:	Yes	Based on chemical register, chemical bin cards, chemical stock purchase, it was noted that Suai and Saremas 1 Estate had not use chemicals categorized as World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions. Except for Amine and Cypermethin which were Class II chemicals, all others were of Class III & IV. Paraquat has not be used since 2008 and was replaced by a systemic herbicide and glufosinate ammonium. Both estates had maintained chemical registers for chemicals used and were updated in Jan 2022. The Chemical Registers had listed all Chemicals, Diesel, Petrol, Lubricants and Fertilisers.
	7.2.5a Judgment of the threat and verify why this is a major threat.	Yes	
7.2.5b Why there is no other alternative	Yes		

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	which can be used.		
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	Yes	
	7.2.5d What is the process to limit the negative impacts of the application.	Yes	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	Yes	
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers. Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	Yes	The estate and mill have the SSOP for use of PPE during working. All workers involved in pesticide application were provided with appropriate PPE and replaced when damaged. PPE issue and replacements records were verified by the auditors. Observed during site visit, the PPE provided to the operators such as google, face respirator, nitrile hand glove, rubber boot and apron. Additionally, the operators have been given training regarding the usage safety and health issue and proper way for chemical application by the plantation executives, manager, and asst. manager and chemical supplier with knowledge on chemical handling and applications. Latest trainings on pesticides/chemical handling were in Dec 2021 and Jan 2022.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	Yes	Pesticides selected for use were those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with OSH USECHH Regulations (2000). At all visited mill and estate the storage of pesticides was in accordance with recognized best practices. They were stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders and Pesticides Act 1974 (Act 149) and Regulations. All information regarding the chemicals affixed as product label and the accompanying Safety Data Sheet (see OHS CLASS 2013 Regulations) with details of its usage, hazards, trade and generic names were found available in Bahasa Malaysia language understood by workers or explained carefully to them by a plantation management official at operating unit level. A proper premixing area with eye wash facilities and bathing area is available near to the chemical stores. The wastewater from the washing of empty chemical containers and PPE, and chemical mixing was pumped to a storage tank for reuse in chemical mixing. 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	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

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	disposed of and/or handled responsibly if used for other purposes.		health. Inventory and consignment documents verified for confirmation of proper management and disposal. During site inspections at Suai and Saremas 1 Estate, sighted disposal of empty pesticide containers was carried out as per established procedures. Triple rinsing procedures was continually implemented for empty pesticide containers. Meanwhile, site inspection at SW Store, sighted all SW Management was handled according to procedure and regulation.
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	Yes	Aerial spraying was not practiced in the estate and there was no evidence to show that any had been carried out.
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	No	Specific annual medical surveillance for pesticide operators was documented as action to treat related health conditions. From the report, all workers fit for working in confined space.
	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 eq work.	Yes	Saremas 1 CU continued to comply with procedures where no work with pesticides was given to persons under the age of 18, pregnant or breast-feeding women. List workers involved with pesticides were maintained by the estate and mill. Identification of pregnancy was done at the estate's clinics during the monthly medical check-up and interview with female workers. Pregnancy test was conducted on doubtful cases.
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	Yes	Saremas 1 CU, sighted Waste and Pollution – Identification, Prevention, Mitigation and Improvement Plan that applicable for all estates. The estates have identified and documented type of waste that generated from its operation in a Waste Management Plan 2021/2022. The waste management plan has also identified source of pollution, possible waste/pollution, effected environment, prevention, mitigation and enhancement.
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	Yes	Based on documents review, sighted procedures on Labelling, Handling, Storage, Transfer and Disposal of Scheduled Waste were amended in May 2021 by expanding the scope of SW management to SW generated by contractors' who stayed in the plantations as stated in clause 2. For Continuous Improvement Plan (CIP) has included Scope of CIP plan shall include all area of operations including any work conducted by contractors, vendors or service provider as stated in page 2, 3 rd clause. During site inspections and interview session with FFB Contractor Driver at Suai and Saremas 1 Estate, they do FFB lorry service and maintenance at estate workshop or mini workshop contractor and the disposal of waste material managed by estate workshop via scheduled wastes management.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	7.3.3 The unit of certification does not use open fire for waste disposal.	Yes	During site visit at Saremas 1 CU, there was no evidence of open fire has been used for waste disposal. All domestic wastes (household and food waste only) have been disposed via landfill.
7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level that ensures optimal and sustained yield.	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	Yes	Saremas 1 and Suai Estate continued to practice the maintenance of long-term soil fertility by annual application of fertilizer based on foliar sampling and soil analysis, biomass retention (pruned fronds left to decompose in the fields), EFB application and decanter cake (from POME) application in some fields. Fertiliser application, which was of paramount importance for maintenance of soil fertility, was carried based on the recommendation made by the EMU recommendations made by Head of R&D Department. Annual fertiliser recommendations were made based on annual foliar sampling. Some of the main fertiliser recommend for 2021/2022 were NPK, NK1, Kieserite and KieserBor. Compound fertilizers were applied in mature palm due to labor Fertilizer programmed for year 2021 was uncompleted due to labour shortage and the program was carry forward to year 2022. The current applications follow as per programmed.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	Yes	Fertiliser application, which was of paramount importance for maintenance of soil fertility, was carried based on the recommendation made by the EMU recommendations made by Head of R&D Department. Annual fertiliser recommendations were made based on annual foliar sampling and soil sampling. Some of the main fertiliser recommend for 2021/2022 were NPK, NK1, Kieserite and KieserBor. Compound fertilizers were applied in mature palm due to labor shortage. Fertilizer programmed for year 2021 was uncompleted due to labour shortage and the program was carry forward to year 2022. The current applications follow as per programmed.
	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	Saremas 1 and Suai Estate continued to have a nutrient recycling strategy in place.
	7.4.4 Records of fertiliser inputs are maintained.	Yes	Fertiliser application, which was of paramount importance for maintenance of soil fertility, was carried based on the recommendation made by the EMU recommendations made by Head of R&D Department. Annual fertiliser recommendations were made based on annual foliar sampling and soil sampling. Some of the main fertiliser recommend for 2021/2022 were NPK, NK1, Kieserite and KieserBor. Compound fertilizers were applied in mature palm due to labor shortage. Fertilizer programmed for year 2021 was uncompleted due to labour shortage and the program was carry forward to year 2022. The current applications follow as per programmed.
7.5 Practices minimise and control erosion and	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	Yes	Based on the soils maps dated in July 2020, provided by GIS Team, there were no fragile/marginal soils in the both estates visited. The soil maps came with description of the soils characteristics such as texture, depth, drainage, parent material and key aspect for

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings																														
degradation of soils.			management. The soil series were classified as follows: a) In Suai Estate the soil comprises of Bekenu, Bedup, Kechor, Kuah, Mukah, Nyalau and Semarak. b) Saremas 1 Estate soil series consists of Bekenu, Bedup, Buso, Derawan, Durian, Gong Chenak, Kechor, Kuah, and Semarak.																														
	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	Based on Slope Classification Map dated in May 2016, provided by GIS Team, there is no replanting on steep slopes (above 25 degrees). <table border="1"> <tr> <td colspan="5">Saremas 1 Estate:Slope area percentage</td> </tr> <tr> <td>0-6° (flat undulating)</td> <td>6-12° (undulating-rolling)</td> <td>12-18° (hilly)</td> <td>18-25° (steep)</td> <td>>25° (very steep)</td> </tr> <tr> <td align="center">79.48</td> <td align="center">12.36</td> <td align="center">6.88</td> <td align="center">1.27</td> <td align="center">0.00</td> </tr> <tr> <td colspan="5">Suai Estate:Slope area percentage</td> </tr> <tr> <td>0-6° (flat undulating)</td> <td>6-12° (undulating-rolling)</td> <td>12-18° (hilly)</td> <td>18-25° (steep)</td> <td>>25° (very steep)</td> </tr> <tr> <td align="center">92.66</td> <td align="center">5.22</td> <td align="center">1.99</td> <td align="center">0.13</td> <td align="center">0.00</td> </tr> </table>	Saremas 1 Estate:Slope area percentage					0-6° (flat undulating)	6-12° (undulating-rolling)	12-18° (hilly)	18-25° (steep)	>25° (very steep)	79.48	12.36	6.88	1.27	0.00	Suai Estate:Slope area percentage					0-6° (flat undulating)	6-12° (undulating-rolling)	12-18° (hilly)	18-25° (steep)	>25° (very steep)	92.66	5.22	1.99	0.13	0.00
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	7.5.3 There is no new planting of oil palm on steep terrain.	Yes	Auditors have verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all two estates. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at Saremas 1 CU.																														
7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.	7.6.1 (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	Yes	Extensive planting on marginal and fragile soils, was avoided by the estate. There were no fragile/marginal soils in Saremas 1 CU.																														
	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	Auditors have verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all three estates. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at Saremas 1 CU.																														
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	Yes	Auditors have verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all three estates. Based on the audit findings, it is confirmed that there were no new planting or new development of areas at Saremas 1 CU.																														
7.7 No new planting on peat, regardless of depth after 15	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	There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. Based on the soil maps prepared by GIS Department dated 14/09/2019, only Suai Estate consuming peat area planting which is 25.61 ha.																														

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
November 2018 and all peatlands are managed responsibly.	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).	Yes	Areas of peat within the managed areas were inventoried, documented and reported to RSPO Secretariat. Evidence was sighted that the Report along with maps, etc. was sent to RSPO Secretariat via email in Nov 2021. Total peat area planting was declared is 25.61 ha for Suai Estate.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	Yes	Refer to 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', Suai Estate are managing peat area with proper facilities and equipment such as water weirs, water table, piezometer and subsidence pole. All of these facilities regularly monitored and reported to the estate manager on monthly basis. This monitoring and measurement conducted in monthly basis at 7 peat block. Piezometer, pie scale and canal block to monitoring water level on peatland conducted in monthly basis. Based on site visit at peat area Suai Estate B041 – Division 2, observed the water table was maintained at an average of 56 cm (between 40 cm and 60 cm) below ground surface, measured with groundwater piezometer readings, 53 cm (between 50 cm and 70 cm) below ground surface as measured in water collection drains, through a network of appropriate water control structures (e.g. weirs, sandbags, etc.) in fields, and water gates at the discharge points of main drains.
	7.7.4 (C) A documented water and ground cover management programme is in place.	Yes	Piezometer that installed on field where data recording collected by weekly. Sighted the water and ground cover management was monitored and verified between 50 cm and 70 cm below ground surface. Through the field observation sighted that water weirs in peat areas are equipped with water gate facilities to ensuring water is available along the years.
	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Proc, 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	Yes	Drainability Assessment is not required in Malaysia for replanting on contiguous areas of peat less than 40 hectares.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	<p>water table (paludiculture) or rehabilitated with natural vegetation. This is subject to transitional (5 yrs: 2019 to 2025) arrangement stated in the Drainability Assessment Proc. Within 12months initial implementation period, company could submit other alternate methodology to be considered by RSPO for recognition.</p>		
	<p>7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.</p>	<p>Yes</p>	<p>According to soil survey and assessment which carried out by PARAM AGRICULTURAL SOIL SURVEYS (M) Sdn Bhd in December 2007, obtain information that through the total of Suai Estate concession, it only 60.80 ha (1.2%) of them are peat area. However, soil maps prepared by GIS Department in Sept 2019, the peat soil planted was amended or resurveyed from 60.80 ha to 25.61 ha.</p> <p>Suai Estate has established Management Plan of Peat for plantation with peat area. The plan described best management practices for oil palm cultivation in peat as part of management's commitment to sustainable peat management. The objective is to prevent peatland fire and peat management. The program for Suai Estate consists of: peatland fire simulation; hotspot monitoring by security; hotspot monitoring from tower and dissemination to communities related peatland fire. According to "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019), Suai Estate are manage peat area with proper facilities and equipment such as water weirs, water table, piezometer and subsidence pole. All of these facilities regularly monitored and reported to the estate manager on monthly basis.</p>
	<p>7.7.7 (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.</p>	<p>Yes</p>	<p>Suai Estate was bought from Sarawak Government in 1983 and 1985, respectively. It has been confirmed during the sale of the land that there was no history of customary land tenure or recognized NCR land. In addition, there have been no new land clearing or new development since 15 November 2018. The peat areas in Suai Estate used for palm oil cultivation. There is no more unplanted peat area.</p>
<p>7.8 Practices maintain</p>	<p>7.8.1 A water management plan is in place and implemented to promote more efficient</p>	<p>Yes</p>	<p>Saremas 1 CU had in place a water management plan last reviewed dated in May 2021 to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. Attention was given to water quality,</p>

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
the quality and availability of surface and groundwater.	use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:		quantity, and consumption usages.
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	Yes	For Saremas 1 CU, the continued availability of water sources and to avoid negative impacts on other users in the catchment has been conclude in the Environmental Monitoring Report (EMR) for Suai and Saremas 1 Estate. Based on the result, water quality monitoring is generally within Class IIB of NWQS at all monitoring points.
	7.8.1b Workers have adequate access to clean water.	Yes	The worker's quarters have adequate clean water supply by both estates and mill, the management also done the analysis to ensure water was safe for domestic use. Domestic water analysis results showed no adverse quality. Water analysis, both raw and treated water, conducted one every twice per year (In Compliance with WHO) and send the water sampling at accredited laboratory. Based on the result, water quality monitoring is generally within WHO at all monitoring points.
	7.8.2 (C) Water courses and wetlands are protected, incl. maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the mgmt and rehabilitation of riparian reserves' (April 2017).	Yes	Based on site visit at riparian and other buffer zones, it has been observed that both estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing policy to maintain the buffer by restricting agrochemicals application.
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.	Yes	Effluent treatment process flow sighted in the Lay Out Effluent Pond. Stated in the process flow is the maximum mill capacity per hour is 60mt ffb/hr. According to DOE's license, the disposal method of the final discharge is through watercourse. The Biogas and ETP was regularly maintained by desludging of the ponds to ensure its efficiency. Final discharge samples were taken on monthly basis and sent to an accredited laboratory for analysis. The results of analysis were submitted to the DOE on quarterly basis. All parameters were within the regulatory limit such as BOD discharged to land irrigation was not more than 20 mg/l.
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	Yes	Process water is obtained from water catchment near to the mill. The water usage per tonne of fresh fruit bunches (FFB) continued to be monitored on monthly basis. Total average for 2021 was 2.31litre/Mt FFB.
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	Saremas 1 CU, showed evident that they are compiling the data by monthly basis and document it for further action to improve on their efficiency of using the renewable and non-renewable energy. Apart from use of grid electricity, palm fibre and shells were also used to generate electricity through biogas plant.

RSPO PUBLIC SUMMARY REPORT

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7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.	7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.	Yes	<p>For input FY 2021, the report sends via email to RSPO on 16/04/2022 through the Palm GHG calculator and publicly reported.</p> <table border="1"> <thead> <tr> <th>Description</th> <th>tCO₂e/tProduct</th> <th>Production</th> <th>t/yr</th> </tr> </thead> <tbody> <tr> <td>CPO</td> <td>0.99</td> <td>FFB Processed</td> <td>246,173.66</td> </tr> <tr> <td>PK</td> <td>0.99</td> <td>CPO Processed</td> <td>53,216.672</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Land Use</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>OP Planted on Mineral Soil</td> <td>20266.00</td> </tr> <tr> <td>OP Planted on Peat Soil</td> <td>58.20</td> </tr> <tr> <td>Total oil palm planted area</td> <td>20324.20</td> </tr> <tr> <td>Conservation (forested)</td> <td>1405.37</td> </tr> <tr> <td>Conservation (non-forested)</td> <td>299.29</td> </tr> </tbody> </table> <p>Milling extraction rate:</p> <table border="1"> <tbody> <tr> <td>OER</td> <td>21.62</td> </tr> <tr> <td>KER</td> <td>3.14</td> </tr> </tbody> </table> <p>Mill Emission</p> <table border="1"> <thead> <tr> <th>Emission source</th> <th>tCO₂e</th> <th>tCO₂e/tFFB</th> </tr> </thead> <tbody> <tr> <td>POME</td> <td>5505.93</td> <td>0.02</td> </tr> <tr> <td>Fuel consumption</td> <td>1583.65</td> <td>0.01</td> </tr> <tr> <td>Grid electricity utilisation</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td colspan="3">Credits</td> </tr> <tr> <td colspan="3">Export of excess electricity to housing & grid</td> </tr> <tr> <td>Sale of PKS</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Sale of EFB</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Total</td> <td>7089.59</td> <td>0.03</td> </tr> </tbody> </table> <p>Plantation / field emission</p> <table border="1"> <thead> <tr> <th rowspan="2">Emission sources</th> <th colspan="3">Own</th> </tr> <tr> <th>tCO₂e</th> <th>tCO₂e/ha</th> <th>tCO₂e/FFB</th> </tr> </thead> <tbody> <tr> <td>Land Conversion</td> <td>90346.56</td> <td>9.76</td> <td>0.45</td> </tr> <tr> <td>CO₂ Emissions from Fertiliser</td> <td>4826.06</td> <td>0.52</td> <td>0.02</td> </tr> </tbody> </table>	Description	tCO ₂ e/tProduct	Production	t/yr	CPO	0.99	FFB Processed	246,173.66	PK	0.99	CPO Processed	53,216.672	Land Use	Ha	OP Planted on Mineral Soil	20266.00	OP Planted on Peat Soil	58.20	Total oil palm planted area	20324.20	Conservation (forested)	1405.37	Conservation (non-forested)	299.29	OER	21.62	KER	3.14	Emission source	tCO ₂ e	tCO ₂ e/tFFB	POME	5505.93	0.02	Fuel consumption	1583.65	0.01	Grid electricity utilisation	0.00	0.00	Credits			Export of excess electricity to housing & grid			Sale of PKS	0.00	0.00	Sale of EFB	0.00	0.00	Total	7089.59	0.03	Emission sources	Own			tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/FFB	Land Conversion	90346.56	9.76	0.45	CO ₂ Emissions from Fertiliser	4826.06	0.52	0.02
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RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings			
			N2O Emissions from Peat	189.10	0.02	0.00
			N2O Emissions from Fertiliser	3383.61	0.37	0.02
			Fuel Consumption	2539.67	0.27	0.01
			Peat Oxidation	1379.27	0.15	0.01
			Sinks			
			Crop Sequestration	-85636.56	-9.25	-0.43
			Conservation Sequestration	-1382.82	-0.15	-0.01
			Total	15644.90	1.69	0.08
			Palm Oil Mill Effluent (POME) Treatment			
			Diverted to compost			0%
			Diverted to anaerobic digestion			100%
			Diverted to Anaerobic Digestion			
			Diverted to anaerobic pond			1%
			Diverted to methane capture (flaring)			0%
			Diverted to methane capture (electricity generation)			99%
	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).	Yes	Auditor has verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to the sampled estates areas. Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at Saremas 1 CU. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.			
	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	Yes	The Environmental Impact and Aspect Assessment and Pollution Prevention Plan was used to identify the GHG emissions. Some of the Greenhouse Gas emissions are through Land Conversation, Crop Sequestration, Fertiliser, N ₂ O from fertiliser, Fuel Consumption, Peat Oxidation. Plans to reduce or minimize them are in place. Saremas 1 CU also plan to reduce GHG by construct Biogas plant to capture Methane gas generated from the Effluent Treatment Plant to generate biogas engine to produce electricity for mill and domestic use.			
7.11 Fire is not used for preparing land and is prevented in the	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 Nov 2019 and signed by its Chairman & Chief Executive Officer. Both estates had complied to the policy. There was no evidence to show that fire had been used for preparing land for replanting. In the			

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
managed area.			2020 replants visited during the audit in the Suai Estate, it was evident that all palms were felled, shredded, windrowed and left to decompose.
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	Yes	Saremas 1 CU had established fire prevention and control measures for the areas under direct management estate and POM. In the mill their water hydrant and valid fire extinguishers at the various operating stations. Suai and Saremas 1 Estate had valid fire extinguishers at the office, employee quarters, chemical & fertiliser stores, diesel skid tank.
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	Yes	The CU had not practiced any open burning and there was no evidence to show that fire had been used for preparing land for replanting activity. The CU also engaged with adjacent to stakeholder in Jan 2022 on fire prevention and control measures by inviting them to join training.
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	This is not applicable since there is no New Planting since November 2005. No HCV or HCS forests had been damaged.
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	Yes	The HCV Management and Action Plan was updated in Feb 2020 and May 2021 respectively combining all estates having one main HCV and Conservation Management Plan. In the presentation of the report to stakeholders through CDBC meeting held on 10 January 2022, the current HCV Management and Action Plan 2021 – 2025 did not require amendments and duly accepted.
	7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.	Yes	
	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	
	7.12.4 (C) Where HCVs, HCS forests after	Yes	

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	<p>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>and management plan.</p>
	<p>7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p>	<p>Yes</p>	<p>This is not applicable since there is no new land clearing.</p>
	<p>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.</p>	<p>Yes</p>	<p>There was no RTE species identified at Suai and Saremas 1 Estate. Suai and Saremas 1 Estate had conducted HCV refresher training in Nov & Dec 2021 for Saremas 1 and Suai in Feb 20 The training was done by the appointed Honorary Wildlife Department at the CU.</p>

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	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. 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 Nov 2018, the Remediation and Compensation Procedure (RaCP) applies.	Yes	This is not applicable since there is no new land clearing since November 2005.

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

Clause	Indicators	Comply Yes/No	Findings
5.5.2 Time-bound plan 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.	(a)	Yes	Details are available as per the following attachments relating to Time Bound Plan of Wilmar International Plantation as of 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)	Yes	Details of the Time Bound Plan described as per attachment 6 updated as of January 2022.

RSPO PUBLIC SUMMARY REPORT

	(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 eg);	Yes	Details of the Time Bound Plan described as per attachment 6 updated as of January 2022.
	(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 of 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 st January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;	Yes	<p>Wilmar International Limited (WIL) complied to all the requirements. There was no new planting within the properties in WIL. The Assessment of compliance to RSPO Partial Certification Requirements has been carried out for clause 5.5.3 (e)-(h) of certification system for units such as:</p> <p><u>Indonesia Units</u></p> <ul style="list-style-type: none"> - Pt. Agrindo Indah Perkasa in June 2018 - Ksu Mutiara Bosa Sikilang in June 2018 - Kud Damai Sejahtera in June 2018 - Kud Kapar in June 2018 - Koperasi Karya Makmur Pahirangan in February 2019 - Koperasi Mamur Sejahtera in January 2019 - Kud Permata Sawit Maligi in June 2018 - Kud Rantau Pasaman Sasak in June 2018 - Pt. Buluh Cawang Plantation in June 2018 - Pt. Daya Landak Plantation in June 2018 - Pt. Indoresin Putra Mandiri in June 2018 - Pt. Putra Indotropical in June 2018 - Pt. Pratama Prosentindo in June 2018 - Pt. Agronusa Investama – PAHAUMAN in June 2018 - Pt. Sarana Titian Permata Pom 2 on January 2019

RSPO PUBLIC SUMMARY REPORT

				<ul style="list-style-type: none"> - Koperasi Tuah Jubata in February 2019 <p><u>Africa Units</u></p> <ul style="list-style-type: none"> - Biase Plantation Limited (BPL) in February 2019 - Eyop Industries Limited (EIL) in February 2019 <p><u>Malaysia Units</u></p> <ul style="list-style-type: none"> - Jebawang Sdn Bhd – Laba Utama in April 2019 - Suburmas Plantation Sdn Bhd in April 2019 <p>Evidences & document reference such as HCV report results, land title, Racp status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc were concluded adequate in the report for all uncertified management units.</p>
(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		There was no report or issues raised in relation to land conflicts.
(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2;	Yes		There was no report or issues raised in relation to labour disputes. Evidences & document reference such as HCV report results, land title, Racp status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc. were concluded adequate in the report for all uncertified management units.
(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	Yes		Wilmar International Limited (WIL) complied to all the related legal requirement. Evidences & document reference such as HCV report results, land title, Racp status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc. were concluded adequate in the report for all uncertified management units.

RSPO PUBLIC SUMMARY REPORT

(e)	<p>The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 5.5.3 (a) – (d) above by the audit team based on self-declarations only by the company,</p>	Yes	<p>Wilmar International Limited (WIL) complied to all the requirements. There was no new planting within the properties in WIL. The Assessment of compliance to RSPO Partial Certification Requirements has been carried out for clause 5.5.3 (e)-(h) of certification system for units of the following i.e.</p> <ul style="list-style-type: none"> a) Indonesia Units b) Africa Units c) Malaysia Units <p>Evidences & document reference such as HCV report results, land title, 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> <p>There was no non-compliance found for all requirements during this audit.</p>
	<p>with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:</p>		
	<ul style="list-style-type: none"> • A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement; 	Yes	
	<ul style="list-style-type: none"> • Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. 	Yes	
	<ul style="list-style-type: none"> • Desktop study e.g. web check on relevant complaints 	Yes	
	<ul style="list-style-type: none"> • If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements. 	Yes	
	<p>(f)</p> <p>For requirements 5.5.3 (a)-(d) above, the classification of critical and non-critical is as stated in the RSPO P&C. If a non-compliance against a critical indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful</p>	Yes	

RSPO PUBLIC SUMMARY REPORT

		conclusion unless it is actively addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be available.		
	(g)	Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these Certification Systems.	Yes	
<p>5.6.6 The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p> <p>The CB shall have a mechanism in place to identify the interested parties and ensure a represented samples size of the interested parties are consulted in each audit.</p> <p>The CB shall keep track which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle.</p>		No additional indicators	Yes	The copies of legal ownership of the land for both Saremas 1 & Suai Estates were verified. The land was bought from Sarawak Government in 1983 and 1985, respectively. It has been confirmed during the sale of the land that there was no history of customary land tenure or recognized NCR land. These were confirmed with the Miri Lands and Survey.

RSPO PUBLIC SUMMARY REPORT

ATTACHMENT 4

DETAILS OF NON-CONFORMITIES AND CORRECTIVE ACTIONS TAKEN (NCRs ISSUED DURING REMOTE AUDIT)

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Corrective Action	Verification by Assessor
7.2.10 RAR 01 2021	Major	<p>Requirement: Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>Finding : Specific annual medical surveillance for workers handling chemical and pesticides was not yet conducted as per recommend made by CHRA assessor.</p> <p>Objective evidence :</p> <ul style="list-style-type: none"> • At Saremas 1 & Suai Estate last medical surveillance for workers handling chemical and pesticides was carried out on 22/01/2020. • At Saremas 1 POM last annual medical surveillance for workers handling chemical was carried out on 22/02/2020. 	<p>Root caused: The appointed panel clinic unwilling to come and conduct the medical surveillance due to COVID 19 cases was spikes at the surrounding plantation district area.</p> <p>Corrective action: Medical surveillance has been conducted for the year 2021.</p>	<p>Specific annual medical surveillance for pesticide operators was documented as action to treat related health conditions:</p> <p><i>At Saremas 1 POM</i>, the medical surveillance was carried out on 16/10/2021, 25/10/2021, 02/11/2021 by K Klinik Desa Indah Sdn. Bhd. (OHD Dr. Daniel Arokiasamy #HQ/14/DOC/00/373) for 23 workers/staffs. Report indicated that 23 workers were found to be fit to continue with their respective duties.</p> <p>Health examination for working in confined space was carried out on 23/03/2022 by Gribbles Pathology (OHD Dr. Un Chuan Hock #HQ/08/DOC/00/209) for 4 workers. From the report, all workers fit for working in confined space.</p> <p><i>Suai Estate</i> All pesticide operators and workshop operators were sent for annual medical surveillance at Klinik Desa Indah Sdn. Bhd. (OHD Dr. Daniel Arokiasamy #HQ/14/DOC/00/373) for 49 workers on 16/10/2021, 25/10/2021, 02/11/2021 and the results was satisfactory, and all workers fit to handle chemical.</p> <p><i>Saremas 1 Estate</i> All pesticide operators and workshop operators were sent for annual medical surveillance at Klinik Desa Indah Sdn. Bhd. (OHD Dr. Daniel Arokiasamy #HQ/14/DOC/00/373) for 62 workers on</p>

RSPO PUBLIC SUMMARY REPORT

				16/10/2021, 23/10/2021 and the results was satisfactory, and all workers fit to handle chemical. Status: CLOSED
4.2.3 MAR 01 2021	Minor	<p>Requirement: 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>Finding : The unit of certification does not 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>Objective evidence : Based on phone conversation with 1 employee, he informed that grievance he made was ignored by the superior. The grievance also not recorded in the complaint and grievance record.</p>	<p>Root caused: Based on the investigation, the supervisor was not recorded the grievance into the grievance records.</p> <p>Corrective action: Management has made the awareness training on the complaints and grievance system on 1/10/2021 (Saremas 1 Estate), 20/10/2021 (Suai Estate) and 23/9/2021 (S1POM).</p>	<p>Saremas 1 CU keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and evidenced by communication letters sighted by the auditor. Outcome of complaints/grievance and requests by stakeholders were also communicated to them as verified in the minutes of stakeholder's meeting held on 10 January 2022 and 17 December 2020 at Saremas 1 conference room, meeting with contractors held on 25 February 2022 and Worker Sosial and Welfare Committee meeting held on 23 November 2021 (Saremas 1 estate). During onsite audit, the auditor verified on the grievance made by 1 of the employee interviewed during remote audit. The grievance on the broken housing was solved by the management. Therefore, NCR on remote audit, MAR 01 2021 has been satisfactorily closed.</p> <p>Status : CLOSED</p>
6.1.5 MAR 02 2021	Major	<p>Requirement: A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>Finding: Gender committee was in place but some of the employees do not know on the gender committee.</p>	<p>Root caused: 2 female workers were just joined the company.</p> <p>Corrective action: The women and children committee has conducted the briefing to the workers on 18/9/2021.</p>	<p>Auditor has verified through interview with 2 female employees that they had given training by the management on Gender Committee.</p> <p>Status: CLOSED</p>

RSPO PUBLIC SUMMARY REPORT

		Objective evidence: Based on the phone conversation with 2 female employees from Saremas 1 POM and Saremas 1 Estate, they did not know on the establishment of the gender committee.		
<u>DETAILS OF NON-CONFORMITIES AND CORRECTIVE ACTIONS TAKEN (NCRs ISSUED DURING ONSITE AUDIT)</u>				
6.5.3 MAR 05 2022	Minor upgraded to major	Requirement: 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. Finding: Assessment of new mothers has not been conducted, and actions taken to address the needs have not been identified. Objective evidence: Based on interview and documentation review, there was no assessment of new mothers has been done.	The issue: The assessment of new mothers was not conducted The root cause: There is no guideline on the new mother's assessment Correction: The assessment has been conducted by the sustainability Unit on 27-28/4/2022 at Saremas 1 and Suai Estate. Corrective action plan: The assessment of new mothers will review periodically based on the future needs.	Evidence: Assessment of new mothers has been conducted on 27-28/4/2-2022. The assessment has been done to the all new mothers at Saremas 1 and Suai Estate. The objective to identify the needs of new mothers in term of pre, during and post pregnancies. Status: CLOSED
3.3.2 DA 01 2022	Minor upgraded to major	Requirement: A mechanism to check consistent implementation of procedures is in place. Finding: 1. The mechanism to check consistent implementation of procedure/guideline "Senarai Semak PPE dan Peralatan Kerja" was not in place. 2. The effectiveness of the mechanism to control the grievances on the shop prices was not available.	The issue: 1. (a) The management has not enough stock of harvesting tools such sickle and sharpening stones in the store (b) The assessment of working tools and PPE the has not included the harvesting machete. 2. The monitoring of goods prices was not done at sundry shop The root cause: 1. (a)The management do not have proper procedure on monitor PPE &	Evidence: 1. Records of issuance harvesting tools i.e sickle and sharpening stone to the harvester. 2. Reports of inspection on monitoring prices at sundry shop. Status: CLOSED

RSPO PUBLIC SUMMARY REPORT

		<p>Objective evidence:</p> <ol style="list-style-type: none"> 1. The harvesting tools i.e. sickle, sharpening stones was not provided free of charge to the harvester as per procedure/guideline. Based on inspection at general store Saremas 1 Estate, sighted harvesting tools i.e. sickle, sharpening stones was not available as a physical stock. Supported with the interview session at B004 Harvesting Operation at Saremas 1 Estate, harvesters mention they buy their own harvesting tools i.e. sickle, sharpening stones, harvesting machete. In the meantime, harvesting machete was not listed in the procedure/guideline "<i>Senarai Semak PPE dan Peralatan Kerja</i>" as importance/appropriate tools for harvester to cutting the fronds/bunches stalk. 2. Mechanism of monitoring goods prices was not adequate at sundry shop. 	<p>peralatan kerja (b) The assessment has miss out to include the harvesting machete into the procedure/guideline due to harvester has their own preferences</p> <ol style="list-style-type: none"> 2. There was no procedure on the mechanism of monitoring goods prices at sundry shop <p>Correction:</p> <ol style="list-style-type: none"> 1. (a) Management to provide the harvesting tools such sickle and sharpening stone (b)To redo the assessment on peralatan kerja and PPE. 2. To provide the proper signboard and erect at the canteen to monitor the goods prices 910 control item) at sundry shop. Management to provide report on mechanism to control the sundry shop prices. <p>Corrective action plan:</p> <ol style="list-style-type: none"> 1. (a)The management has produced the procedure on monitoring of PPE & peralatan kerja (b) The email on the new procedure of SOP for PPE & Peralatan kerja has been produce and been submit to all unit for the compliance 2. The procedure of mechanism of monitoring goods prices has been produce and brief to the canteen operator 	
6.2.2 MAR 03 2022	Major	<p>Requirement: Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours,</p>	<p>The issue:</p> <ol style="list-style-type: none"> 1. No record on the annual leave for the worker 2. No record on harvester who assist by 	<p>Evidence:</p> <ol style="list-style-type: none"> 1. Annual leave records in the checkroll books. 2. Briefing to the workers on

RSPO PUBLIC SUMMARY REPORT

		<p>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.</p> <p>Finding:</p> <ol style="list-style-type: none"> 4. Annual leave that has been taken by some workers was not paid based on the agreement. 5. Payroll documents i.e payslip and checkroll records does not give accurate information on compensation for all work performed. 6. 1 harvester was found working excessive hours. <p>Objective evidence: Based on interview and documentation review at Saremas 1 Estate and Suai Estate the following was found:</p> <ol style="list-style-type: none"> 1. Annual leave or approved leave for certain workers in Saremas 1 Estate and Suai Estate was not paid according to the agreement. 2. The harvester who assist by their spouse for loose fruit collection and the work performed was not recorded. 3. Based on interview and documentation review, 1 harvester at Saremas 1 Estate was found working excessive days for the month of Feb 2022 and March 2022. 	<p>their spouse to collect loose fruit</p> <ol style="list-style-type: none"> 3. Harvester work without rest for a month <p>The root cause:</p> <ol style="list-style-type: none"> 1. The management do not produce the record to recording the worker annual leave 2. The harvester who assists by their spouse to collect loose fruit has not informed the field supervisor 3. The harvester not aware on the requirement to not working excessive hours <p>Correction:</p> <ol style="list-style-type: none"> 1. The record of annual leave has been produced for the workers 2. All worker that wants to assist their husband after working hour shall get permission from the field supervisor and the work performed been recorded 3. All worker has been briefed on the requirement to take the rest day <p>Corrective action plan: The memo on the annual leave, rest day, VLP and assisting work after working hour has been produce and sign by top management.</p>	<p>permission if they want to assist their spouse collect loose fruits.</p> <ol style="list-style-type: none"> 3. Briefing to the workers on needs of rest day at least once in a week. <p>Status: CLOSED</p>
3.6.1 DA 02 2022	Major	<p>Requirement: All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p>	<p>The issue:</p> <ol style="list-style-type: none"> 1. Not provide the proper and approved PPE to the workers in handling of chemical at biogas plant, boiler plant 	<p>Evidence:</p> <ol style="list-style-type: none"> 1. Record of PPE given to the workers handling of chemical at biogas plant

RSPO PUBLIC SUMMARY REPORT

		<p>Finding: Handling of chemical and tractor driver activities was not risk assessed to identified H&S issues. Mitigation plans and procedures was not fully implemented and monitored.</p> <p>Objective evidence: Saremas 1 POM, the HIRARC of risk control under appropriate personal protective equipment (PPE) i.e. approved chemical respirator with multigases cartridge, safety goggles were not monitored and assessed to the workers in handling of chemical at Biogas Plant, Boiler Plant etc.</p> <p>Saremas 1 and Suai Estate, the HIRARC of risk control under appropriate PPE i.e. safety shoe was not monitored and assessed in the mitigation plans and procedures to tractor driver to cover all potentially hazardous machine operations.</p>	<p>2. Not monitor the risk control under PPE such safety shoe inside the estate HIRARC</p> <p>The root cause:</p> <ol style="list-style-type: none"> 1. The management has not monitored the CHRA recommendation for worker that working at the biogas plant, boiler plant 2. The risk control under appropriate PPE safety shoe was not monitor and assess <p>Correction:</p> <ol style="list-style-type: none"> 1. Management has provided the PPE such as chemical respirator with multigases cartridge and safety goggles for the worker handling chemical at biogas plant and boiler. 2. The HIRARC on risk control under PPE for estate and mill has been reassess. <p>Corrective action plan:</p> <ol style="list-style-type: none"> 1. Continuously monitoring on the awareness of the PPE according to the recommendation from CHRA. 2. The Mill has provided the MEMO - HIRARC Penerimaan buah ke kilang on proper PPE that shall be used during send the FFB to the Mill ramp. 	<p>and boiler.</p> <ol style="list-style-type: none"> 2. HIRARC was updated for Saremas 1 and Suai Estate. <p>Status: CLOSED</p>
2.1.1	Major	<p>Requirement: The unit of certification complies with applicable legal requirements.</p> <p>Finding: Unit of certification does not comply with certain applicable legal requirements i.e Immigration Act 1959 (Act 155) and Regulation and Orders, Section 55b</p>	<p>The issue: Contractor worker working using other estate work permit</p> <p>The root cause: The workers from contractor Bunga Pengantin previously worked at Ladang Jelalong and at time audit, he already worked with Wilmar.</p>	<p>Evidence:</p> <ol style="list-style-type: none"> 1. Application of work permit from contractor site. The application has been made but stuck at Immigration Department. <p>Status: CLOSED</p>

RSPO PUBLIC SUMMARY REPORT

		<p>Objective evidence: Based on interview and documentation review, 1 of the contractor worker was found to work using the other estate work permit i.e Ladang Jelalong.</p>	<p>Correction: The contractor has applied work permit for their worker through company AP.</p> <p>Corrective action plan: 1. Management has produced the SOP on recruitment of foreign and local worker for contractor worker. 2. Management has brief the contractor on the SOP of contractor management with included the regulation requirement 3. Email from Assistant General Manager on the instruction to the estate management on registered the worker contractor through company AP. 4. Management has applied the worker contractor using company AP (letter receive from immigration)</p>	
6.2.1	Major	<p>Requirement: Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>Finding: 1. Agreement for contractor workers in Saremas 1 Estate i.e Bunga Pengantin not available to the workers and was not explained to them in language they understand. 2. Working hours in the agreement was differs between office and operation and from what the workers understand.</p> <p>Objective evidence: 1. Based on interview with Bunga Pengantin employees, he did not understand on the work agreement and the agreement was not available to</p>	<p>The issue: 1. Contractor worker don't understand the contract as the contract is in Bahasa Malaysia and English 2. Saremas 1 POM ramp worker and office worker do not understand the contract</p> <p>The root cause: 1. The contractor worker doesn't understand due to language barrier 2. The contract has not been amended according to regulation requirement</p> <p>Correction: 1. The contract for the contractor worker has been revise and translated to Bahasa Malaysia and Bahasa Indonesia 2. The contract has been amended and brief to the ramp and office workers</p>	<p>Evidence: 1. Briefing to the contractor workers i.e Bunga Pengantin Enterprise. 2. Amended agreement has been made by the management. This includes on the standardization of working hours.</p> <p>Status: CLOSED</p>

RSPO PUBLIC SUMMARY REPORT

		<p>him.</p> <p>2. Based on interview and documentation review, there was different working hours between office and operation, lead to discrepancy in term of overtime payment.</p>	<p>Corrective action plan:</p> <ol style="list-style-type: none"> 1. The latest revise contract was briefed to the worker personally together with contractor in charge 2. The latest revise/amended contract was briefed to the ramp and office workers 	
3.7.1	Major	<p>Requirement: 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.</p> <p>Finding: Certain applicable aspects of RSPO P&C was not understand by the workers and estate management and includes assessments of training.</p> <p>Objective evidence: Based on the interview and documentation review, no assessments of training has been conducted for certain applicable aspect of RSPO P&C such as:</p> <ol style="list-style-type: none"> 4. Payslip detailing 5. Vacation leave pay 6. Annual leave 	<p>The issue: The office staff and worker do not understand the payslip , vacation leave pay and the annual leave term and condition</p> <p>The root cause: The office staff and worker has not been trained on the payslip detailing, vacation leave pay and annual leave term and condition</p> <p>Correction: The management has conducted the training on payslip detailing, vacation leave pay and annual leave term and condition to the office staff and worker.</p> <p>Corrective action plan: The management has included the training assessment on the payslip detailing, vacation leave pay and annual leave term and condition into the annual training plan.</p>	<p>Evidence:</p> <ol style="list-style-type: none"> 1. Copy of the training on payslip, vacation leave pays and the annual leave term and condition. <p>Status: CLOSED</p>
6.2.4	Major	<p>Requirement: 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</p>	<p>The issue:</p> <ol style="list-style-type: none"> 1. Toilet at mill for processing area was not fully function. 2. Windows at workers quarters only using old curtain / plastic. <p>The root caused:</p> <ol style="list-style-type: none"> 1. The toilet has not maintained accordingly due to no regular 	<p>Evidence:</p> <ol style="list-style-type: none"> 1. Picture toilet repair has been provided. 2. Picture windows to be replace has been provided. <p>Status: CLOSED</p>

RSPO PUBLIC SUMMARY REPORT

		<p>of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p> <p>Finding:</p> <ol style="list-style-type: none"> 3. Saremas 1 POM did not provide proper sanitation facilities i.e proper toilet at mill 4. Suai Estate did not provide proper windows at workers quarters. <p>Objective evidence:</p> <ol style="list-style-type: none"> 1. Based on the site visit, it was found that toilet for the ramp workers was not fully functioned. 2. Based on the site visit, it was found that 2 units of windows houses was closed by plywood, as a result of broken windows and to prevent rainwater go inside the quarters during rainy day. 	<p>inspection conducted.</p> <p>Corrective action plan:</p> <ol style="list-style-type: none"> 1. Regular inspection especially on the facilities at mill will be arranged monthly. 	
3.4.3	Major	<p>Requirement: The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>Finding: The social management and monitoring plan was not fully implemented, reviewed and updated regularly in a participatory way.</p> <p>Objective evidence:</p> <ul style="list-style-type: none"> - Saremas 1 CU SIA Management Plan were only for compilations of issues from Community – based development committee (CBDC) meeting, Environmental Meeting, complaints and grievance, Safety and Health meeting, Social and welfare and Gender Meeting and also data from CSR, complaints 	<p>The issue:</p> <ol style="list-style-type: none"> 1. The Saremas 1 CU SIA management plan only for complaint issues which are not discussion the main activities 2. The Suai estate social management plan was developed same with Saremas 1 estate 3. The needs of the toiler for ramp workers have not been assess <p>The root cause:</p> <ol style="list-style-type: none"> 1. The SIA assessment has not been revising internally and externally 2. The SIA for Suai has not properly develop by the PIC 3. The needs for the toilet ramp for Mills has not been assess as there is no complaint /grievance on the particular toilet by the ramp worker last time. 	<p>Evidence:</p> <ol style="list-style-type: none"> 1. Social impact assessment has conducted by consultant, MEC (Malaysian Environmental Consultant) on 19-30/6/2022. The report yet to complete. <p>Status: CLOSED</p>

RSPO PUBLIC SUMMARY REPORT

		<p>and grievance and Consultations and communications</p> <ul style="list-style-type: none"> - There were no specific issues related to revising of SIA Management Plan such as discussion about main activities such as transporting, contract workers, safety and health, land conflict, access right, Social issues etc. and for worker, only worker's representative involved in the social management action plan. Inadequate involvement of workers such as non-union workers, dependence, gender, races, job scopes and etc. From the management plans, there was no discussion about previous Social Management Plan, Either, adequately addressed and can be closed. - Suai Estate Social Management Plan has been wrongly developed without consideration demographic changes, social issues in the Suai Estate and the Plan was developed is same with Saremas 1 Estate, However sighted the minutes meeting for Plan only PIC from Saremas 1 was involved. - Saremas 1 POM has not assessed on the needs of the toilet for the ramp workers. 	<p>Correction:</p> <ol style="list-style-type: none"> 1. The issues inside the SIA action plan has been included the grievance and also main activities such transportation, contract workers, safety and health, land conflict access right, social issues from representative worker and also non representative workers 2. The SIA for Suai has been separate between Saremas 1 and Suai SIA 3. The needs for toiler ramp has been reassess under SIA action plan Mill <p>Corrective action plan:</p> <ol style="list-style-type: none"> 1. The SIA will revised / update / review depend on the current situation at CU in term of replanting, demographic, employee needs, stakeholder needs, etc. 	
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RSPO PUBLIC SUMMARY REPORT

ATTACHMENT 5

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

	P & C Indicator	Specification Major/Minor	Detail Non-conformances	Verification by Assessor
1	6.7.3 c	HNAJ 01 2020 Major	Not all appropriate personal protective equipment (PPE) was used by harvester at the place of work. Saremas 1 and Suai Estate – Harvesters were not wearing appropriate shoes.	During site visit at Suai and Saremas 1 Estate at Harvesting Operation, Circle Spraying Operation and Nursery Operations, sighted they were seen to wearing PPE such as face masks respirators, goggles, harvesting shoes, rubber boots, nitrile/cotton gloves, apron and safety helmet/straw hat, to cover all potentially hazardous operations. The condition of each PPE item and their validity lifespan were found good. Status: Closed
2	5.5.2	MZK 01 2020 Major	There are no explicit procedures for the outsourced process. There is a SC procedure n file, Saremas 1 POM RSPO – SCC dated 1/2/2020. However, there is no explicit procedures for the outsourced process.	There are new explicit procedures for the outsourced process namely Reception & Despatch date 1/9/2020, this procedure covering the process from Weighbridge until ending at Refinery. Status: Closed
3	7.12.4	MZK 02 2020 Major	The integrated management plan was not developed in consultation with relevant stakeholders and has not considered any relevant wider landscape level considerations (where those were identified). HCV management Plan has been developed this into a management Plan dated 9 January 2019. However, it was found that the integrated management plan is not developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where those are identified) and also the management Plan has not considered the result of monitoring.	The current 'HCV Management and Action Plan Wilmar Sarawak Group 2021 -2025' and presented records showed the Plan was developed and assessed after consultation with relevant stakeholders. Documents received as evidence include the following minutes of CDBC meetings dated 02/4/2022, 03/4/2022 Suai Estate attended by 12 and 14 respectively members of the stakeholders and CDBC meetings held at Saremas 1 estate on 10/1/2022 where the 'The HCV Management and Action plan 2021-2025 Wilmar Sarawak Group' was briefed and accepted by all present which included local communities, UNIMAS and other external stakeholders. Status: Closed
4	3.3.2	HAHB 02 2020 Minor	The store SOP Ref SPOM1-SSOP-025 was not effectively implemented. Saremas 1 Mill – The general store office housekeeping / waste management was not maintained effectively.	During site inspection at general store at Saremas 1 POM, Saremas 1 Estate and Suai Estate, observed all store in good condition and well managed as per SOP Ref SPOM1-SSOP-025. However, the mechanism to check consistent implementation of procedures/guidelines "Senarai Semak PPE dan Peralatan Kerja" was not in place. The harvesting tools i.e. sickle, sharpening stones was not provided free of charge to harvester as per procedure. Based on inspection at general store Saremas 1 Estate, sighted harvesting tools i.e. sickle, sharpening stones, harvesting machete was not available as a stocks/inventories. Supported with the interview session at B004 Harvesting Operation at Saremas 1 Estate, workers mention their buy their own harvesting tools i.e. sickle, sharpening stones, harvesting machete. Meanwhile, harvesting

RSPO PUBLIC SUMMARY REPORT

				<p>machete was not listed in the procedure as importance/appropriate tools for harvester to cutting the fronds/bunches stalk. As a result, Major (Upgraded) NCR DA 01 2022 was raised. Status: Recurrence NCR (Upgraded)</p>
5	1.1.5	MAR 01 2020 Minor	<p>Current list of contact and details of certain stakeholders and their nominated representatives was not available. Suai Estate and Saremas 1 Estate did not have NGO i.e. SADIA in their list of stakeholders.</p>	<p>The current list of contact and details of certain stakeholders and their nominated representatives at Saremas 1 CU were available. A review of the Stakeholders lists showed relevant NGOs including SADIA and WWF were included. Government agencies, including the Sarawak Forest Department (SFD) and Sarawak Forestry Corporation (SFC) were also included. Hence previous <i>Minor NCR (MAR 012020)</i> raised in the previous audit is <i>satisfactorily closed.</i> Status: Closed</p>
6	2.2.3	MAR 02 2020 Minor	<p>Contracts in Suai Estate and Saremas 1 Estate did not contain clauses disallowing child, forced and trafficked labour. Based on sampled contracts agreements in the following estates there was found that none of them did not contain clauses disallowing child, forced and trafficked labour:</p> <ul style="list-style-type: none"> a) Suai Estate for the contractor Chin Mui Jin (FFB and EFB Transport) and Sejati Enterprise (Replanting). b) Saremas 1 Estate for the contractor Bunga Pengantin Enterprise (FFB/EFB Transport) & Ismail Harun (FFB Transport). 	<p><i>Saremas 1 POM</i> - All contracts, including those for FFB supply, contain specific clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection as verified through Online Supplier Registration (OSR) and the Supplier Code of Conduct (SCOC) which apply to all contractors for due diligence and meeting legal requirements. Evidences were clearly stated in contract between Saremas 1 POM and all contractors among others</p> <ul style="list-style-type: none"> a) Repkajaya Sawit Services / Goldenrise Sdn Bhd / Medan Mestika Sdn Bhd, b) Kristina anak Tarang, Gilson Giang Ak Rantau, Rantau anak Tapu, c) Ingo Suabong, Sara Ak Ato, Johari Malon (FFB Supplier), d) Tong Yen Enterprise, Farjaya Shine Sdn Bhd. Pengangkutan Lean Soon Hung (Sarawak) Sdn Bhd e) Bunga Pengantin Enterprise, Ismail bin Harun (FFB Transporter) <p>Sighted at POM contracts between FFB Supplier/Collecting centre, CPO and PK transporter with POM There is clause 21 Certification compliance (POM) and Clause 6 Certification compliance at the Estate contain clauses disallowing child, forced and trafficked labour in contract with CPO and PK Transporter and clause i and ii in Akur janji with FFB Supplier. Status: Closed</p>
7	6.5.3	MAR 03 2020 Minor	<p>Management has assessed the needs of new mothers, but without consultation with the new mothers. Based on interviewed on the sampled female employee in Saremas 1 Estate, it was found that the employee did not know that adequate space and paid breaks should be provided to enable mothers with infants 24 months or younger to breastfeed or express and store breast milk with privacy. The female employee currently has infants of 7 months' years old.</p>	<p>The implementation of the corrective action plan was not accepted. Therefore, this NCR categorized as recurrence NCR. Status: Recurrence NCR</p>

RSPO PUBLIC SUMMARY REPORT

8	6.7.4	MAR 04 2020 Minor	The contractor workers did not provide with medical care and covered by accident insurance. Based on document review in Saremas 1 Estate, it was found that workers from contractor Bunga Pengantin Enterprise and Ismail bin Harun did not provide with medical care and covered by accident insurance.	<p>Medical care and accident insurance is provided to all employees, both Local and Foreign workers under Employees' Social Security Act 1969 (Act 4). Sighted the last three months' payment (January 2022, February 2022 and March 2022) made to SOCSO on Form 8A for foreign and local workers at the POM and both estates were available for reviewed.</p> <p>Meanwhile, for contractor workers, sighted medical care and accident insurance was covered also: Saremas 1 Estate</p> <ol style="list-style-type: none"> 1) Contractor: Bunga Pengantin Enterprise (FFB & EFB Transport) Contractor workers: Asis Insurance: Tokio Marine Insurans (Malaysia) Berhad, Policy no. #PGR-P0467575-SD-AGY-22 2) Contractor: Ismail General Contractor (FFB & EFB Transport) Contractor workers: Muktar Lamuseng Insurance: Socso #F8302100295Z <p>Suai Estate</p> <ol style="list-style-type: none"> 1) Contractor: Nation Light Transport & Machinery Sdn. Bhd. (FFB & EFB Transport) Contractor workers: Ahmad & Ricky Asis Insurance: Tokio Marine Insurans (Malaysia) Berhad, Policy no. #PGP-P0467572-SD-AGY-22 <p>Status: Closed</p>
9	7.12.7	MZK 03 2020 Minor	Outcomes of HCV monitoring are not fed back into the management plan. The monitoring of HCV has been conducted at Saremas 1 and Suai Estate, However, it was found that the Outcomes of monitoring of HCV at Saremas 1 and Suai Estate are not fed back into the management plan	<p>Records on monthly monitoring was verified during the audit.</p> <ol style="list-style-type: none"> a) The compiled HCV monitoring records using '<i>Borang Monitoring HCV Sarawak</i>' in the '<i>Laporan Memantau Kawasan HCV4 Suai (CU1) 2020 – 2021</i>' were sighted. HCV Monitoring for the months of January – April 2021 was verified i.e. monitoring dates included 11/1/2021, 12/2/2021, 16/3/2021 and 19/4/2021. b) 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. c) Regular patrols had been conducted and reported on the protection of these HCV sites. The staff and workers were also consulted on this, and they were aware of the responsibility to protect endangered, rare and threatened species of forest flora and fauna in their areas. There were also posters put up at all estates offices. <p>It was also found the results and outcomes of monitoring the HCV at Saremas 1 and Suai Estate were incorporated in the updated 'HCV Management and Action Plan 2021-2025 Wilmar Sarawak Group'.</p> <p>Status: Closed</p>

RSPO PUBLIC SUMMARY REPORT

ATTACHMENT 6 – Timebound Plan

Time Bound Plan of Wilmar International Limited

Malaysia

No.	Company	Estate	Mill	Location	Certification year	Status
1	PPB Oil Palms Berhad	Sapi 1, Sapi 2, Kiabau	Sapi Palm Oil Mill	Sandakan	2008	Certified
2	PPB Oil Palms Berhad	Reka Halus	Reka Halus Palm Oil Mill	Sandakan	2008	Certified
3	PPB Oil Palms Berhad	Sabahmas	Sabahmas Palm Oil Mill	Lahad Datu	2008	Certified
4	PPB Oil Palms Berhad	Saremas 1, Suai	Saremas 1 Palm Oil Mill	Bintulu	2010	Certified
5	PPB Oil Palms Berhad	Saremas 2, Kaminsky, Segarmas	Saremas 2 Palm Oil Mill	Bintulu	2010	Certified
6	PPB Oil Palms Berhad	Ribubonus	Ribubonus Palm Oil Mill	Sandakan	2010	Certified
7	PPB Oil Palms Berhad	Terusan 1, Terusan 2, Rumidi	Terusan Palm Oil Mill	Sandakan	2010	Certified
8	PPB Oil Palms Berhad	Hibumas 1, Hibumas 2, Jebawang, Sekar Imej, Sapi Sugut, Sri Kamusan	Sri Kamusan Palm Oil Mill	Sandakan	2011	Certified
9	PPB Oil Palms Berhad	Suburmas	Suburmas Palm Oil Mill	Bintulu	2023	Added into Wilmar Membership in 2018, 3 years till certification deadline (2021); but postponed till 2023 due to Covid-19 which impeded movement of assessor for SIA, HCV/ HCS assessments.
10	PPB Oil Palms Berhad	Laba Utama Sdn Bhd - Jebawang Sdn Bhd	Sri Kamusan Palm Oil Mill	Sandakan	2023	Acquired in 2019, 3 years till certification deadline (2022); but postponed till 2023 due to Covid-19 which impeded movement of assessor for SIA, HCV/ HCS assessments.

RSPO PUBLIC SUMMARY REPORT

Indonesia (Kalimantan)

No.	Company	Mill	Estate	Location	Certification year	Status
1	PT Mustika Sembuluh I	PT Mustika Sembuluh I mill	Mustika Sembuluh 1, Mustika Sembuluh 2, Mustika Sembuluh 3, KUD Bitu Maju Bersama	Central Kalimantan	2010	Certified; KUD was certified in 2014
2	PT Kerry Sawit Indonesia I	PT Kerry Sawit Indonesia I mill	Kerry Sawit Indonesia 1, Kerry Sawit Indonesia 2, Kerry Sawit Indonesia 3.	Central Kalimantan	2011	Certified
			KUD Karya Bersama, KUD Sejahtera Bersama, KUD Tabiku Makmur, KUD Kosudra	Central Kalimantan	2023	Re-Audit, intial 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; intial certification to proceed after HGU process
6	PT Mustika Sembuluh 2	PT Mustika Sembuluh 2 mill	Mustika Sembuluh 1, Mustika Sembuluh 2, Mustika Sembuluh 3, KUD Bitu Maju Bersama	Central Kalimantan	2015	Certified
7	PT Mentaya Sawit Mas	PT Mentaya Sawit Mas mill	Mentaya Sawit Mas 1, Mentaya Sawit Mas 2,	Central Kalimantan	2015	Certified
			KUD Karya Makmur Pahirangan	Central Kalimantan	2023	Land title issue

RSPO PUBLIC SUMMARY REPORT

8	PT Kerry Sawit Indonesia 2	PT Kerry Sawit Indonesia 2 mill	Kerry Sawit Indonesia 1, Kerry Sawit Indonesia 2, Kerry Sawit Indonesia 3.	Central Kalimantan	2015	Certified
9	PT Rimba Harapan Sakti	PT Rimba Harapan Sakti mill	PT. Rimba Harapan Sakti 1, PT. Rimba Harapan Sakti 2,	Central Kalimantan	2015	Certified
			KUD Makmur Sejahtera	Central Kalimantan	2023	Land title issue
10	PT Karunia Kencana Permaisejati	PT Karunia Kencana Permaisejati mill	PT. Karunia Kencana Permaisejati 1, PT. Karunia Kencana Permaisejati 2, PT. Karunia Kencana Permaisejati 3	Central Kalimantan	2017	Certified
11	PT Agro Nusa Investama (Sambas)	PT Agro Nusa Investama (Sambas) mill	ANI Sambas	West Kalimantan	2019	Certified
			KUD Cempaka Biru dan Sentama Lestari	West Kalimantan	2019	Certified
			Srimaram estate	West Kalimantan	2023	Land title issue
12	PT Bumipratama Khatulistiwa	PT Bumipratama Khatulistiwa mill	Bumi Pratama Khatulistiwa	West Kalimantan	2016	Certified
			Buluh Cawang Plantation	West Kalimantan	2023	HGU is in process
			KUD 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

RSPO PUBLIC SUMMARY REPORT

Indonesia (Sumatera)

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

RSPO PUBLIC SUMMARY REPORT

9	PT Musi Banyuasin Indah	PT Musi Banyuasin Indah Mill	Sei Selabu, Sei Jarum, KUD Karya Gatra, KUD Karya Makmur Sriwijaya, KUD Panca Karya Jaya, KUD Sumber Makmur, KUD Tri Tunggal Karya	South Sumatra	2023	Final Audit, HGU issue
			Agro Palindo Sakti	South Sumatra	2014	Was part of APM Mill which had been closed down
10	PT Sinarsiak Dianpermai	PT Sinarsiak Dianpermai Mill	Sinarsiak DianPermai	Riau	2023	Pre assessment audit, HGU issue
11	Agrindo Indah Persada 2	Agrindo Indah Persada 2 Mill	Agro Indah Persada	Jambi	2023	HGU issue

RSPO PUBLIC SUMMARY REPORT

Ghana and Nigeria

No.	Company	Estate	Mill	Location	Certification year	Status
1	Benso Oil Palm Plantation (BOPP)	BOPP Adum Bansa Estate and associated Scheme Smallholders	BOPP Mill 1	Western Region, Ghana	2014	Certified
2	Benso Oil Palm Plantation (BOPP)	Treboum Smallholders	-	Western Region, Ghana	2022	NPP passed in 2019
3	Biase Plantations Limited	Calaro Estate	Calaro POM	Cross River State, Nigeria	2022	to be certified (mill construction completed) - delay from 2021 due to Covid
4	Biase Plantations Limited	Calaro Extension Estate	-	Cross River State, Nigeria	2022	to be certified (NPP completed in 2016)
5	Biase Plantations Limited	Ibiae Estate	Construction not started	Cross River State, Nigeria	2023	to be certified (NPP completed. Mill construction yet to start)
6	Eyop Industries	Ibad Estate	Construction not started	Cross River State, Nigeria	2025	to be certified (mill construction yet to start), pending clarification for NPP assessment
7	Eyop Industries	Kwa Falls	-	Cross River State, Nigeria	2025	to be certified
8	Eyop Industries	Oban	-	Cross River State, Nigeria	2025	to be certified (NPP not started), Pending clearance from government for NPP assessment