



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

File Ref. : ES11320002

RSPO PUBLIC SUMMARY REPORT

CLIENT : WILMAR INTERNATIONAL LIMITED – SAREMAS 2 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 2	Saremas 2 Palm Oil Mill	3° 26' 57.745"N	113 °45'59.689"E	18 KM 115, Bintulu-Miri Road 97008 Bintulu, Sarawak.
	Saremas 2 Estate	3° 29' 20.648"N	113 °47'7.123" E	
	Segarmas Plantation	3° 28' 10.529"N	113 °48'12.845"E	
	Kaminsky Plantation	3° 24' 29.734"N	113 °45'22.572"E	

MAP : See Attachment 1

AUDIT DATE : 11 – 15 April 2022

DURATION : 28 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 the Identity Preserved Supply Chain Model

VALIDITY OF RSPO CERTIFICATE : 14/06/2020 – 13/06/2025

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 ZULFAKAR BIN KAMARUZAMAN

Name : Foo Siew Theng

Signature :

Signature :

Date : 15/07/2022

Date : 18 Jul 2022

RSPO PUBLIC SUMMARY REPORT

SUMMARY OF AUDITS

Recertification audit				
On-site audit date	:	16 – 20 March 2020	No. of auditor days:	20 Auditor days
Audit team	:	Dzulfiqar Azmi (TLA), Rozaimee Ab Rahman, Rahayu Zulkifli, Selvasingam T Kandiah.		
No. of major NCR	:	8	Indicator: 2.1.1, 3.4.3, 3.6.1, 4.1.1, 6.7.3, 7.7.4, 7.8.2, 5.5.2 (SCCS)	Closing date: 2/06/2020
No. of minor NCR	:	7	Indicator: 1.1.5, 2.2.2, 2.2.3, 3.1.3, 3.3.2, 6.2.7, 6.4.1	
Indicate by ticking the stakeholders interviewed during the on-site audit		Employees	Settlers	Villagers / Local communities
		√		√
		Contract workers	NGOs	Govt. agency
		√	√	√
		Indigenous people	Contractor	Others (Please specify)
		√	√	
Supply base sampled	:	Saremas 2 Estate, Segarmas Estate, & Kaminsky Estate		
Changes since the last audit	:	No changes		
Justification of audit planning	:	Total allocation of auditor days for Saremas 2 CU were: <ul style="list-style-type: none"> • Mill = 5 days (5 days for safety and health, environment, mill best practices, GHG verification and for supply chain certification systems) • All estate = 5 days each for verification of safety and health, environment, good agriculture best practices, GHG verification. 		
Report approved by	:	Kamini A/P Sooriamoorthy	Approval date : 22/06/2020	

Annual Surveillance Audit 1				
On-site audit date	:	11 – 15 April 2022	No. of auditor days :	28
Audit team	:	Mohd Zulfakar Kamaruzaman (LA), Rozaimee Ab Rahman, Dzulfiqar Azmi, Mohd Ab Raouf Asis, Rohazimi Mat Nawi, Mohd Norddin Abd Jalil		
No. of major NCR	:	2	Indicator: 3.3.1, 3.7.1	Closing date : 13/07/2022
No. of minor NCR	:	0	Indicator :-	
Indicate by ticking the stakeholders interviewed during the on-site audit		Employees / Workers organizations	Settlers	Villagers / Local communities
		√		√
		Contract workers	NGOs	Govt. agency
		√	√	√
		Indigenous people	Contractor	Others (Please specify)
		√	√	
Supply base sampled	:	Saremas 2 Estate, Segarmas Estate, & Kaminsky Estate		
Changes since the last audit	:	No changes		
Justification of audit planning	:	Total allocation of auditor days for Saremas 2 CU were: <ul style="list-style-type: none"> • Mill = 7 days (7 days for safety and health, environment, mill best practices, GHG verification and for supply chain certification systems) cover for 2 years cycle • All estate = 7 days each for verification of safety and health, environment, good agriculture best practices, GHG verification cover for 2 years cycle. 		
Name of peer reviewer	:	NA		
Report approved by	:	Kamini A/P Sooriamoorthy	Approval date : 15/07/2022	

Annual Surveillance Audit 2				
On-site audit date	:		No. of auditor days :	
Audit team	:			
No. of major NCR	:		Indicator:	Closing date :
No. of minor NCR	:		Indicator :	
Indicate by ticking the stakeholders interviewed		Employees / Workers	Settlers	Villagers / Local communities

RSPO PUBLIC SUMMARY REPORT

during the on-site audit	organizations			
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
	Indigenous people	Contractor	Others (Please specify)	
Supply base sampled	:			
Changes since the last audit	:			
Justification of audit planning	:			
Name of peer reviewer	:	NA		
Report approved by	:		Approval date :	

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

Annual Surveillance Audit 4				
On-site audit date	:		No. of auditor days :	
Audit team	:			
No. of major NCR	:	Indicator:	Closing date :	
No. of minor NCR	:	Indicator :		
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
	Indigenous people	Contractors	Others (Please specify)	
Supply base sampled	:			
Changes since the last audit	:			
Justification of audit planning	:			
Name of peer reviewer	:	NA		
Report approved by	:		Approval date :	

RSPO PUBLIC SUMMARY REPORT

SUMMARY OF INFORMATION

TABLE 1

	STAGE 2 / RA	ASA 1	ASA 2	ASA 3	ASA 4
*Projection Period / Reporting Period	*Mar. 2020 – Feb. 2021	*August 2021- Jul 2022	April 2022 – March 2023		
Certified FFB Processed (MT)	124,823.38	147,006.59	153,116.59		
Production of Certified CPO (MT)	27,949.84	32,341.45	33,685.65		
Production of Certified PK (MT)	5,856.11	6,435.86	6,406.96		
Certified Areas (Ha)	14,834.92	14,834.92	14,834.92		
Planted Areas (Ha)	11,075.18	11,075.18	**11,071.19		
Production Areas (Ha)	7,557.93	8,759.85	6,686.72		
HCV Areas / Conservation Areas (Ha)	1,379.71	1,379.71	1,379.71		
REMARKS	*Actual period covered during this reporting period is March 2020 – March 2022. **Changes in planted area (specifically in Kaminsky Estate), due to resurvey carried out by the CU. Spot patches of vacant area were found, hence the area was taken out from the initial reporter area.				

*There shall be no gap in the projection period/reporting period.

TABLE 2

	PO	PK
Last years certified volume (MT)	***58,875.46	***12,098.93
Last years actual certified sold (MT)	47,057.24	8,666.21
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)	33,685.65	6,406.96

***There were 5 extensions carried out for this CU i.e., 17/5/21, 6/9/21, 5/10/21, 8/11/21 and 3/3/22 with total of CPO 30,925.62 mt & PK 6,242.82 mt.

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	7
1.4 Stakeholder consultation	7
1.5 Audit plan	8
1.6 Date of next audit	8
2.0 SCOPE OF CERTIFICATION AUDIT	8
2.1 Description of the certification unit	8
2.2 Description of the Supply Base (including planting profile)	8
2.3 Organization Information / Contact Person(s)	10
3.0 AUDIT FINDINGS	11
3.1 Changes to certified products in accordance to the production of the previous year	11
3.2 Progress and changes in time bound plan	11
3.3. Other changes (e.g. organizational structure, new contact person, addresses, etc.)	11
3.4 Status of previous non-conformities * (refer to Attachment 5)	11
3.5 Complaint received from stakeholder (if any)	11
4.0 DETAILS OF NON-CONFORMITY REPORT	12
4.1 For P&C (refer to Attachment 3)	12
4.2 For SC (refer to Attachment 3 – Supply Chain Requirements for Mills)	12
5.0 AUDIT CONCLUSION	12
6.0 RECOMMENDATION	12
List of Attachment	
Attachment 1 : Map of CU	14
Attachment 2 : RSPO Audit Plan	15
Attachment 3 RSPO P&C Audit Checklist And Findings	22
Attachment 4 : Details of Non-conformities and Corrective Actions Taken	80
Attachment 5 : Status of Non-conformities Previously Identified	84
Attachment 6 : Time-bound Plan	90

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 Zulfakar Kamaruzaman	Lead Auditor / Social, HCV, TBP	Holds a B.Sc. Forestry from UPM. He had 5 years of working experience in the oil palm operation. He is a qualified lead auditor for RSPO P&C and RSPO Supply Chain.
Rozaimiee Ab Rahman	Auditor / Occupational health and safety & Environment & SCCS	Holds a B. Sc. of Agriculture from UPM. He had 7 years of working experience in the oil palm operation. He is a qualified Lead Auditor for RSPO P&C and MSPO.
Mohd Ab Raouf Asis	Auditor / Social	Obtained qualification in B.Sc. (Hons) Management Technology Majoring Production and Operation from UTHM in 2007. He has been in the plantation industry for 7 years assisting Estate Manager managing palm oil estates. He has been trained as RSPO as well as MSPO auditor.
Dzulfiqar Azmi	Auditor / Social, Environment, GHG	Holds a B. Sc. in Agriculture from University Teknologi Malaysia (UiTM). He had more than 5 years of working experience in the oil palm operation. He has experience in auditing since 2018. He is trained as an RSPO Lead Auditor.
Rohazimi Mat Nawil	Auditor Safety & Environment, Metrics Template	Hold B. Sc (Hons) Chemical_Gas Engineering from Universiti Teknologi Malaysia. He has been in the Plantations Industry with various company having served in Palm Oil Mill more than 5 years. He was qualified in the auditing line with experienced in Sustainability (MSPO), QMS, EMS, OHSMS and RSPO/MSPO Supply Chain audit.
Mohd Norddin Abd Jalil	Auditor / Good Agricultural Practices (GAP)	Holds a B.Sc.in Agriculture from Universiti Pertanian Malaysia. He has over 35 years working experience in the oil palm plantation operation.

1.3 Audit methodology

The audit covered the Saremas 2 POM and three of its supply bases. Even though the sampling of the number of the supply base was using the formula of $0.8\sqrt{y}$, 100% supply bases i.e., all three-supply bases were covered during the audit namely Saremas 2, Kaminsky Estate and Segarmas Estate. The audit included on-site audit to the estates, mill and settlers' houses to verify the implementation of the requirement of the certification. Interviews with the CU management, relevant settlers, employees, contractors and other relevant stakeholders 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 (including migrant workers)	<ul style="list-style-type: none"> a. Workers work 6 days a week with one rest day (Sunday). They work 8 hours with a minimum of 30 minutes' break in between. b. All sampled workers confirmed that they receive a minimum of RM1100 per month. They receive their salaries before 7th of every month. c. Some workers receive their wages in cash and some workers received their wages through cheque. They change the cheque with the sundry shop inside the estate. d. Any overtime work is mutually agreed between workers and management, and that there is no element of forcing. e. Documented foreign workers are not subjected to any recruitment fee. Foreign workers who choose to keep their passports at the office have done so with their written consent. f. Workers are generally satisfied with the way complaints lodged are acted upon. Delays in house repairs, if any, are usually due to the need to order repair parts. g. Workers, including foreign workers get to appoint their own representatives. There is no interference of influence exerted by the employer. h. For newly-arrived foreign workers who do understand Bahasa or English, translations are provided during briefings.
2) Settlers	- Harrison Ngau (representative for Penan Jambatan Suai)
3) Villagers / Local communities (including women representatives, displaced communities)	<ul style="list-style-type: none"> - Golan Anak Mat (Rh Golan) - Brain Ak Umbong (Rh Brain) - Merudi Ak Jalin (Rh Merudi) - Rantau anak Tapu (Rh Rantau).
4) Suppliers	NA
5) Contract workers	The unit of certification does not have SOP on recruitment of foreign workers for contractor workers. The issue has been raised under indicator 3.3.1.
6) Local & national NGOs	NA
7) Government agencies / Statutory bodies	NA

RSPO PUBLIC SUMMARY REPORT

8) Independent growers / Smallholders	<ul style="list-style-type: none"> Elli Shamsul Ingo ak Senabong Christina anak Tarang Rinit anak Amping Bitu anak Sempurai Tindit Usau anak Christopher Amsil bin Ali Joe Merudi Georie
9) Indigenous people	NA
10) Contractor	1. Lee Transport Sdn Bhd 2. Lai-Lai Transportations Co 3. To Kok Ying Canteen & Transport 4. Syarikat Lean Soon 5. Farjaya Transport 6. Tong Yen Transport
11) Previous land owner (if any)	NA
12) Others (please specify)	NA

1.5 Audit plan : Refer to Attachment 2

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

2.0 SCOPE OF CERTIFICATION AUDIT

2.1 Description of the certification unit

The Saremas 2 certification unit (CU) is under the Saremas Sdn. Bhd. (SSB), a wholly owned subsidiary of Wilmar International Limited. The CU comprises of Saremas 2 Palm Oil Mill, and three of its supply bases, which are Saremas 2 Estate, Segarmas Plantation and Kaminsky Plantation. This CU has been certified to RSPO P&C since 14 June 2010. The Palm Oil Mill commenced its operations in 2000 with processing capacity of 45 MT of FFBs per hour. Saremas 2 CU have ISCC certification beside of RSPO P&C and Supply Chain.

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

The FFB sourced from company owned estates that were certified. Details of the FFB contribution from each source to the Saremas 2 Palm Oil 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		Certifying CB
	Tonnes	Percentage (%)	
Saremas 2 Estate	130,236.15	59.57	SIRIM
Segarmas Estate	36,657.66	16.77	SIRIM
Kaminsky Estate	49,512.58	22.65	SIRIM
Saremas 1 Estate	1,088.82	0.50	SIRIM
Suai Estate	1,129.60	0.52	SIRIM
	218,624.81	100.00	

RSPO PUBLIC SUMMARY REPORT

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

Estates	FFB Contribution	
	Tonnes	Percentage (%)
Saremas 2 Estate	85,858.26	56.07
Segarmas Estate	47,948.33	31.31
Kaminsky Estate	19,310.00	12.61
Grand Total	153,116.59	100.00

**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	Mac 2020 – Jul 2021	August 2021- March 2022	Mar 2020- Mar 2022
FFB Received	152,617.39	66,036.75	218,624.81
FFB Processed	152,588.06	66,036.75	218,624.81
Certified FFB Processed	152,588.06	66,036.75	218,624.81
Crude Palm Oil (CPO)			
Certified CPO Production	32,605.31	15,223.71	47,351.92
Certified CPO delivered as RSPO	32,128.21	14,929.03	47,057.24
Certified CPO delivered as non-RSPO	0	0	0
Certified CPO delivered under other sustainable schemes	0	0	0
Palm Kernel (PK)			
Certified PK Production	6,277.32	2,745.05	8,826.03
Certified PK delivered as RSPO	6,080.98	2,585.23	8,666.21
Certified PK delivered as non-RSPO	0	0	0
Certified CPO delivered under other sustainable schemes	0	0	0
Credits traded through Books and Claim	0	0	0

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

RSPO Supply Chain Model : Mass Balance	Total (MT)
FFB Received	153,116.59
CPO Production	33,685.65
PK Production	6,406.96

Table 5 Planted and certified area of the Saremas 2 CU

Estate	Planted (ha)	Certified (ha)
Saremas 2 Estate	4543.57	6119.92
Segarmas Estate	3344.60	4727.00
Kaminsky Estate	3183.02	3988.00
Total	11,071.19	14,834.92

Table 6: Planting profile for Saremas 2 Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2000	1st	Mature	151.25	3.33
2002	1st	Mature	248.32	5.47
2003	1st	Mature	180.00	3.96
2004	1st	Mature	235.13	5.18
2005	1st	Mature	204.28	4.50
2006	1st	Mature	170.15	3.74
2007	1st	Mature	80.10	1.76

RSPO PUBLIC SUMMARY REPORT

2014	1st	Mature	673.92	14.83
2015	2nd	Mature	377.03	8.30
2016	2nd	Mature	606.69	13.35
2017	2nd	Mature	355.39	7.82
2020	2nd	Immature	361.67	7.96
2021	2nd	Immature	498.40	3.28
2022	2nd	Immature	401.34	8.83
Total			4543.57	100%
Remarks		1. 2022 planting in progress 2. Data as of March 2022		

Table 7: Planting profile for Segarmas Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2015	2nd	Mature	187.57	9.22
2016	2nd	Mature	495.04	24.33
2017	2nd	Mature	412.76	20.29
2018	2nd	Mature	939.13	46.16
2019	2nd	Immature	631.07	18.87
2020	2nd	Immature	679.03	20.30
Total			3344.60	100%
Remarks		1. Data as of March 2022		

Table 8: Planting profile for Kaminsky Estate

Year of planting	Planting cycle (1 st , 2 nd , 3 rd , etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
1996	1 st	Mature	476.76	14.98
1997	1 st	Mature	738.51	23.20
2002	1 st	Mature	17.41	0.55
2017	2 nd	Mature	137.38	4.32
2019	2 nd	Immature	413.54	12.99
2020	2 nd	Immature	657.43	20.65
2021	2 nd	Immature	202.46	6.36
2022	2 nd	Immature	539.53	16.95
Total			3183.02	100%
Remarks		1. 2022 planting in progress 2. Data as of March 2022		

2.3 Organizational Information/Contact Person(s)

Saremas 2 CU (PIC)

Name	:	Daniel Ngau Wan (DNW) & Zaini Mat Ali (ZMA)
Position	:	Group Manager Saremas 2 (DNW) Group Manager Kaminsky & Segarmas (ZMA)
Address	:	18 KM 115, Bintulu-Miri Road 97008 Bintulu, Sarawak.
Phone no.	:	0138512699 & 0198680073
Fax no.	:	-
Email	:	daniel.ngauwan@my.wilmar-intl.com & zaini.matali@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 Not Applicable

There is no associated smallholders supplying FFB to the CU.

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, all remains the same.

3.4 Status of previous non-conformities * ☐ Closed ☒ Not closed*

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

3.5 Complaint received from stakeholder (if any)

No significant complaints from stakeholders were observed. Auditor has verified during the Audit by interview the stakeholder such as surrounding villagers and contractors

4.0 DETAILS OF NON-CONFORMITY REPORT

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

Total no. of minor NCR(s)
(details refer to Attachment 3) List : 2 **MAR 01 2022, DA 01 2022 (3.3.1), DA 02 2022 (3.7.1)**

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

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

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

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

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 ZULFAKAR BIN
KAMARUZAMAN

(Name)

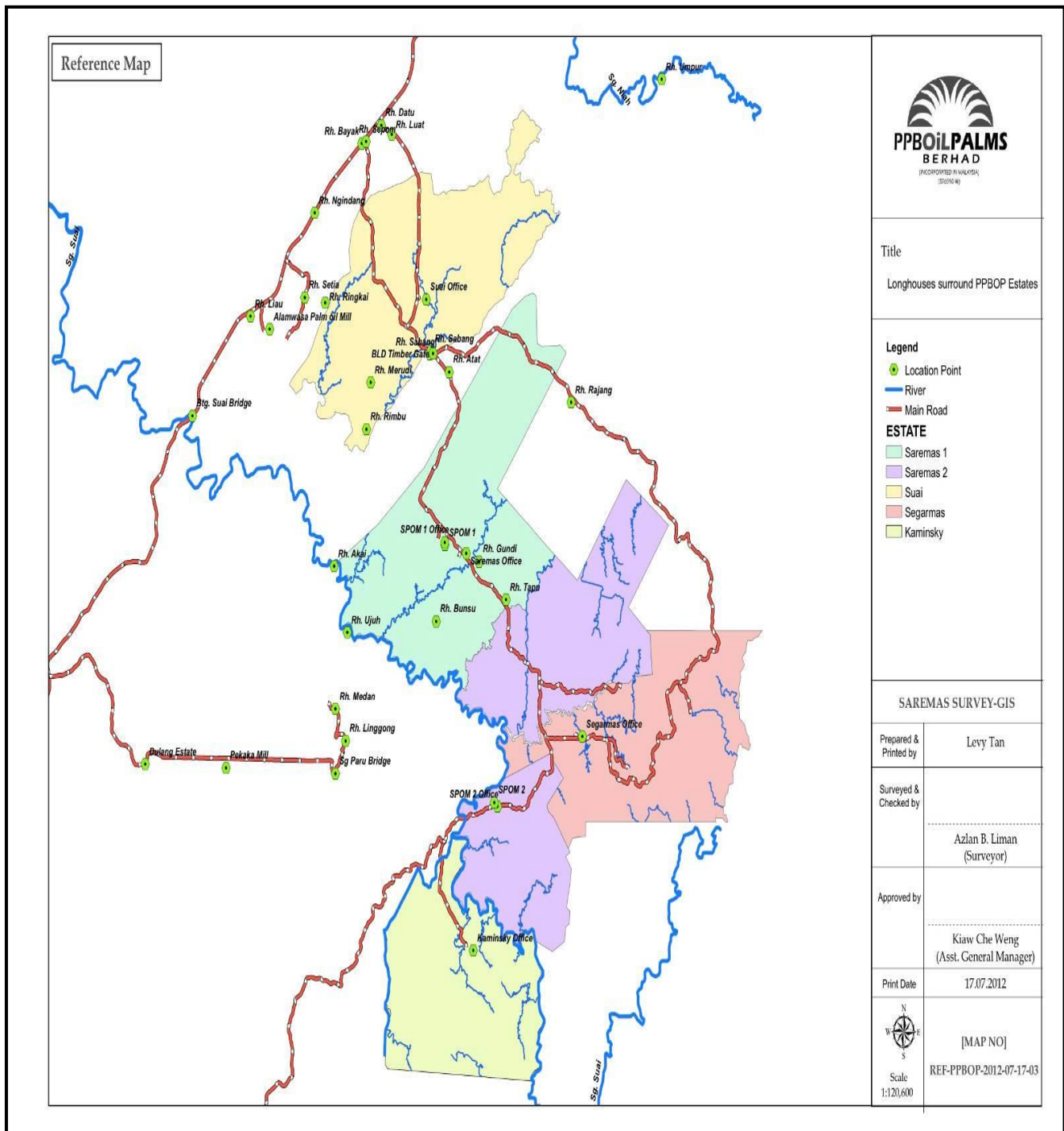


(Signature)

13/7/2022

(Date)

Map of Saremas 2 CU



Attachment 2 – Audit Plan

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 : 11 April to 15 April 2022.

3. Site of assessment : Saremas 2 Certification Unit

- Saremas 2 Palm Oil Mill
- Saremas 2 Estate
- Segarmas Estate
- Kaminsky 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 Zulfakar bin Kamaruzaman (MZK) - HCV, Social (External Stakeholder and Social Mill)

Auditor :

- Rozaimie Ab Rahman (RAR) – Safety and Environment (Mill), GHG, SCCS, TBP
- Dzulfikar Azmi (DA) – Safety (Estate), Social (Estate)
- Mohd Norddin Abd Jalil (MNAJ) – Safety (Estate), GAP
- Rohazimi Mat Nawi (RMN) - Safety (Estate), Environment (Estate), Metric Template
- Mohd Ab Raouf bin Asis (MAR) - Social (Estate)

(ii) Witnessed : N/A

(iii) 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: **Feb 2021 to March 2022**
- b) Reporting time frames for demographic data:
 - i. For mill and estate workers: **as of 31 Dec 2021**
 - ii. For smallholders and outgrowers: **Jan 2021 to Dec 2021**

c) Reporting time frame for all other social and environmental data:

i. Jan 2021 to Dec 2021

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

9. Audit Findings

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

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

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

10. Confidentiality Requirements

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

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

11. Working Language : English and Bahasa Malaysia

12. Reporting

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

13. Facilities Required

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

14. Assessment Programme Details : As below

RSPO PUBLIC SUMMARY REPORT

Date / Time	Coverage of assessment / Activity / Site	MZK	RAR	MNAJ	MAR	DA	RMN
Day 1-11/4/22 8.30am – 9.00am	Opening Meeting – Venue: Saremas 2 or will be decided by the Management 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.	/	/	NA	/	/	/
9.00am – 12.30pm	Site observation to Saremas 2 Estate P1, P2, P3,P4,P5, P6, P7 <ul style="list-style-type: none"> • Verification of basic information estate/Metric templates • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. • GHG Calculation • New planting 			NA	/	/	/
9.00am – 12.30pm	Site observation to Saremas 2 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 affected communities surrounding the POM • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Occupational safety & health aspects, chemical management • Good Milling Practice • Legal & Other requirement • RSPO Supply chain standard implementation including model requirements • Environmental management, waste & chemical management • GHG Calculation 	/	/	NA			
12.30pm – 1.30pm	Lunch Break						
1.30pm – 5.00pm	Continue assessment at respective sites	/	/	NA	/	/	/

RSPO PUBLIC SUMMARY REPORT

Date / Time	Coverage of assessment / Activity / Site	MZK	RAR	MNAJ	MAR	DA	RMN
Day 2 – 12/4/22 8.30am – 12.30pm	Site observation to Saremas 2 Estate P1, P2, P3,P4,P5, P6, P7 <ul style="list-style-type: none"> • Verification of basic information estate/Metric templates • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. • GHG Calculation • New planting 			NA	/	/	/
9.00am – 12.30pm	Site observation to Saremas 2 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 affected communities surrounding the POM • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Occupational safety & health aspects, chemical management • Good Milling Practice • Legal & Other requirement • RSPO Supply chain standard implementation including model requirements • Environmental management, waste & chemical management • GHG Calculation 	/	/	NA			
12.30pm – 1.30pm	Lunch Break	/	/	NA	/	/	/
1.30pm – 5.00pm	Site observation to Segarmas Estate P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> • Verification of basic information estate/Metric templates • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc • Environmental management, waste & chemical management 			NA	/	/	/

RSPO PUBLIC SUMMARY REPORT

	<ul style="list-style-type: none"> Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. Land titles user rights Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. GHG Calculation New planting 						
1.30pm – 5.00pm	Continue Assessment at POM	/	/				
Date / Time	Coverage of assessment / Activity / Site	MZK	RAR	MNAJ	MAR	DA	RMN
Day 3 – 13/4/22 8.30am – 12.30pm	Site observation to Segarmas Estate P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> Verification of basic information estate/Metric templates Confirmation of time bound plan & review of partial certification Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone Occupational safety & health aspects , chemical management Interview with workers, contractors etc. Environmental management, waste & chemical management Social aspects -SIA, management plan & implementation, workers' quarters, Stakeholder consultation with affected communities surrounding the estate Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. GHG Calculation New planting 				/	/	/
8.30am – 12.30pm	Site observation to Saremas 2 Estate P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> Verification of basic information estate/Metric templates Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone Stakeholder consultation with affected communities surrounding the estate GHG Calculation Land titles user rights Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. 	/	/	/			
12.30pm – 1.30 pm	Lunch Break	/	/	/	/	/	/
1.30pm – 5.00pm	Continue assessment at respective site	/	/	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	MZK	RAR	MNAJ	MAR	DA	RMN

RSPO PUBLIC SUMMARY REPORT

Day 4 – 14/4/22 8.30am – 12.30pm	Site observation to Kaminsky Estate P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> • Verification of basic information estate/Metric templates • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. • GHG Calculation • New planting 				/	/	/
	Site observation to Segarmas Estate P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> • Verification of basic information estate/Metric templates • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Stakeholder consultation with affected communities surrounding the estate • GHG Calculation • Land titles user rights Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. 	/	/				
12.30pm – 1.30 pm	Lunch Break	/	/	/	/	/	/
1.30pm – 5.00pm	Continue assessment at respective site	/	/	/	/	/	/
Date / Time	Coverage of assessment / Activity / Site	MZK	RAR	MNAJ	MAR	DA	RMN

RSPO PUBLIC SUMMARY REPORT

Day 5 – 15/4/22 8.30am – 12.30pm	Auditor continue unfinished assessment at Kaminsky Estate (will inform at the morning which estate) P1, P2, P3, P4, P5, P6, P7 <ul style="list-style-type: none"> • Verification of basic information estate/Metric templates • Confirmation of time bound plan & review of partial certification • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Occupational safety & health aspects , chemical management • Interview with workers, contractors etc. • Environmental management, waste & chemical management • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with affected communities surrounding the estate • Interview with gender committee, safety committee, worker representative/Union, contractors, supplier, etc. • Land titles user rights • Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. • GHG Calculation • New planting • Verification of basic information estate/Metric templates • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • Stakeholder consultation with affected communities surrounding the estate • GHG Calculation • Land titles user rights Good Agricultural Practice such as harvesting, weeding, spraying, EFB mulching, POME application, IPM, Peat Management, Buffer Zones, BMP for Buffer Zones. 	/	/	/	/	/	/
12.30pm – 1.30 pm	Lunch Break (Friday Prayer)	/	/	/	/	/	/
2.30pm –3.00pm	Continue assessment at respective site	/	/	/	/	/	/
2.30pm –4.00pm	Audit Team Discussion	/	/	/	/	/	/

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 2 CU continued to maintain a comprehensive system with respect to this criterion. Request Forms were available for stakeholders or interested party to obtain information related to RSPO. Records of visit by the Government agencies were also established. Saremas 2 CU also continued to implement the procedure for responding to any communication as outlined in their RSPO System procedure – RSPO 6.2 Item 6.1 for Internal Communications & 6.2 for External Communication. The procedure required the appointed person-in-charge to respond to all communication within a specified time frame. In addition, Saremas 2 CU adopted a Communications Policy dated September 2010 signed by The Chairman and Chief Executive Officer. This Policy has included guidelines on an effective management and communication of the company's information to for its stakeholders/external parties.
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	YES	The CU continued to use their website for disseminating public information. Information relating to land titles, policies, environmental, social and/or legal, complaints and grievances are available at http://www.wilmar-international.com
	1.1.3 (C) Records of requests for information and responses are maintained.	YES	The Saremas 2 CU continued to maintain the records of requests for information and responses are maintained which included the government agencies, schools, local communities, etc. Management documents relating to environment, social and legal issues, were available to the public except for those prevented by commercial confidential or where disclosure of information would result in negative environmental or social outcomes. The CU has provided relevant information (environmental, social and/or legal) as requested by the relevant stakeholder during the annual stakeholder meeting.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	YES	The CU has continued to use the internal communication through morning assemblies, notice boards and posters, suggestion boxes and complaint forms. External communication has been mainly through mail correspondence. The CU has also used the Stakeholders Meeting “ <i>Community Base Development Committee (CBDC)</i> ” to serve as a forum to discuss issues of interest to the mills, estates, local government agencies and local communities (villagers). Latest stakeholder meeting has been conducted in Jan 2022. Meanwhile, for contractors, they conducted separately and carried out in Feb 2022.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	YES	List of stakeholders for all units within Saremas 2 CU were sighted during the audit. For Saremas 2 estate, the stakeholder list was updated in Jan 2020. It contains list of suppliers, contractors, grocery supplier, government agencies, NGOs including SADIA, the Sarawak NGO representing the local communities from Jambatan Suai in their land claim against Saremas 2 CU, local communities, clinics, neighboring estates and smallholders.
1.2 The unit of certification commits to ethical conduct in all business operations and transactions.	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	YES	Saremas 2 CU is bound by Wilmar International Limited's written Code of Conduct Policy. The policy commits to a code of ethical conduct and integrity in all operations and transactions and were available and sighted during the audit. The Code of Conduct comprises 3 main principles, name avoiding conflict of interest, avoiding misuse and/or abuse of position, and ensuring confidentiality of information and preventing misuse of information.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	YES	Saremas 2 CU have issued a letter of addendum ethical business practices that is to be signed by all contractors, suppliers and vendors. The letter states that the undersigned has read, understood and will comply to Business Codes of Ethics. Saremas 2 CU has implemented Whistle Blowing Policy to help all stakeholders raise concern, without fear of retaliation on any wrongdoing that they may observe in Wilmar Group. The channel of whistleblowing is such as email, call or write letter to the whistleblowing unit in Head Office. Besides that, the company established Internal Audit to monitor the compliance and implementation of the policy throughout the plantations. The contractors and vendors signed on the addendum letter where they complied with the COBC and other law and regulation.

Principle 2: Operate legally and respect rights

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

Clause	Indicators	Comply Yes/No	Findings
2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1 (C) The unit of certification complies with applicable legal requirements.	YES	It was evident that Saremas 2 CU continue to comply with most of the applicable laws and regulations.
	2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	YES	The organization had established their evaluation of compliance and been sighted inside Register of legal and Other Applicable Requirement. Latest evaluation conducted in Feb 2022.
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting	YES	Boundary markers/ marking pegs were available to identify the boundary and were satisfactorily maintained.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	beyond these legal or authorised boundaries.		
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	A list of contracted parties is maintained and available in the Saremas 2 CU.
	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	At Saremas 2 CU since the scope of certification was Identity Preserved, there was no FFB supplier to this CU. Each contract issued to suppliers and contractors contain a clause requiring compliance with legal requirements. Sighted during the audit were contracts between with the FFB & EFB Transporter, Replanting, Sundry Shop, in the Clause 10.5 of the contracts contain a provision that the contractor shall comply with the provisions of the relevant Acts, regulations and by-laws. Legal due diligence is carried out by the Contracts Department at Wilmar HQ in Sandakan. This include obtaining the contractors' registered company names and addresses, contact numbers, evidence of company registration, details of contractors' principle activities, authorised and paid-up capital, list of shareholders, board of directors, bank details, financial auditors, and current trading/business licenses.
	2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	YES	All contracts sampled at Saremas 2 CU (all estate) contain a clause on no child, forced and trafficked labour. This is stipulated under addendum letter of Business Codes of Ethics, Clause 4 of the Agreements which states that the Contractor warrants that it shall not use or promote use of child labour, forced, bonded labour or human trafficking.
2.3 All FFB supplies from outside the unit of certification are from legal sources.	2.3.1 (C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> Information on geo-location of FFB origins. Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder One or more supporting documents for claims Valid MPOB license 	YES	Fresh Fruit Bunches are supplied from Wilmar International Limited owned estates which are certified to RSPO. There is no third-party FFB sent to the mil.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	2.3.2 For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	YES	Fresh Fruit Bunches are supplied from Wilmar International Limited owned estates which are certified to RSPO. There is no third-party FFB sent to the mil.

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	Saremas 2 CU continued to be committed to long-term economic and financial viability. The Estates had management plans in their current year's budgets and projections. The annual budgets and projections were prepared on an annual basis before the end of current year. The yearly budget and projections where the cost of production was reviewed annually and compared against expenditure for each year was an on-going process. The parameters monitored remained essentially unchanged and included Capital (CAPEX) and Operating costs. The operating expenditure included expenditure for Replanting, Mature and Immature Oil Palm upkeep, Administration cost, Housing and Machinery upkeep, allocation for sustainability implementation (environmental, social, occupational safety and health), infra-structure development (roads, etc.), and training etc. The budget for 2022 and projections until year 2028 were made available to the auditors
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	YES	Saremas 2 CU had established and maintained replanting programme which was reviewed annually. Long range replanting was sighted until 2030.
	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 meeting of Saremas 2 CU which were held in Jan 2022 were attended by all the manager's estate/mill and sustainability team. It was chaired by Assistant General Manager, Sarawak Operation and attended by 19 other attendees including Group Manager, Senior Managers and Managers. Among the management review discussed were: 1. Results of internal audits 2. Customer (internal/external) feedback 3. Process performance and product conformity 4. Status of preventive and corrective actions 5. Follow-up actions from management reviews 6. Changes that could affect the management system 7. Recommendations for improvement The management was transparent to address continuous suitability, adequacy and effectiveness of the requirements for effective implementation of RSPO.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	YES	<p>Continuous Improvement Plan has been implemented as per in the document Continuous Improvement Plan (CIP) dated January 2022. The improvement plan outlined issues highlighted as per in the EAI and SIA as well as other reporting means i.e. internal audit as well as external audit. Example of the items outlined are as follows:</p> <ol style="list-style-type: none"> 1) Compliance with legal requirement: <ul style="list-style-type: none"> ▪ Minimum usage of chemical in pest control; ▪ Update of the legal register – laws and regulations; ▪ Supply chain and traceability (specific for POM); ▪ Enhancing the knowledge of all stakeholders. 2) Reduction usage of Pesticides: <ul style="list-style-type: none"> ▪ Enhancement of spraying technique ▪ Continue to expand the IPM programme ▪ Maintaining balanced ground vegetation and soil conditions 3) Environmental Impact: <ul style="list-style-type: none"> ▪ Soil erosion and landslides – road maintenance programme, fronds stacking etc; ▪ Construction of biogas plant – to mitigate methane emission; ▪ Monitoring of BOD level; ▪ Protection of Riparian Buffer zones; ▪ Wildlife Corridor – maintenance of border along the Bukit Durang Conservation Area 4) Waste reduction: <ul style="list-style-type: none"> ▪ Applying EFB mulching on the ground ▪ Scheduled Waste Management – appointing licensed scheduled waste collector ▪ Implementing triple rinsing 5) Pollution and Greenhouse Gas (GHG): <ul style="list-style-type: none"> ▪ Stack emissions – monitoring smoke emission to be in compliance with EQA 1974; ▪ GHG emission – collecting, calculating and monitor the GHG data;
	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	YES	The monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template together with palm trace renewal. This requirement refers to a small set of strategic outcome-based metrics, which are of value to growers, relates directly to the P&C, and aligns with the RSPO Theory of Change ¹ (ToC) and RSPO organizational Key Performance Indicators (KPIs).
3.3 Operating procedures are appropriately documented, consistently implemented and monitored.	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	NO	<p>SOPs in place for the CU. However, it was found that, the standard operating procedure “<i>Riparian, floodplain & water bodies management</i>” dated December 2020 was not providing explicit directions to protected, including maintaining and restoring appropriate riparian and other buffer zones in line with ‘RSPO Manual on BMPs for the management and rehabilitation of riparian reserves’ (April 2017). <i>As a result, Major NCR DA 01 2022 was raised.</i></p> <p>Also, the unit of certification does not have SOP on recruitment of foreign workers for contractor workers. The SOP also must in line with current applicable legal requirement. <i>As a result, Major NCR MAR 01 2022 was raised.</i></p>

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	YES	Saremas 2 CU continued to implement the mechanism to ensure consistent implementation of operation as per SOPs. The mechanism of ensuring consistent implementation was by: <ul style="list-style-type: none"> i. Periodic reporting from operating units ii. On site visits, inspections and discussions with relevant personnel iii. Assessments and audits like Internal Audits, PA visits and by RSPO Audits iv. Consultation with RSPO team & management.
	3.3.3 Records of monitoring and any actions taken are maintained and available.	YES	Relevant records on implementation and monitoring of Agriculture Manual, at the CU were clearly verified. Records of monitoring and the actions taken by the Saremas 2 CU continued to be maintained. This is to ensure that the established procedures were consistently implemented.
3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	YES	Saremas 2 CU has already been certified before and has no new plantings or operations. Nevertheless, a Social Impact Assessment was conducted in 2008 entitled "Scoping SIA Saremas 1 & 2, Segarmas and Kaminsky Estates". The report was prepared combined with the Saremas 1 CU and with the participation of the relevant stakeholders, such contractors, suppliers, government agencies, estate and mill workers and the neighbouring five long-house communities, Rumah Bunsu, Rumah Gundi, Rumah Taou (Saremas 1), Rumah Sabang (Suai) and Rumah Merudi (Suai). Saremas 2 CU has established procedure for SOP for Environmental Impact Assessment Procedure titled "Identification of Environmental Aspects and Evaluation of Environmental Impacts. Environmental aspect and impact (EAI) which covers form upstream activities such as FFB reception until downstream processes was sighted during assessment and established for 2022. Identification and evaluation of environmental impact was done for all activities and processes related to the mill operation. Among the most significant environmental receptors are the boiler stack emission which associated with air emission, palm oil mill effluent (POME) discharge to land application. Latest revision of EIA was related to ESP commissioning & operation, dated in Dec 2021.
	3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	YES	For Saremas 2 CU, the SIA and EIA reports separated. Significant environmental aspect and impact mitigation methods was implemented from EAI Evaluation Form. Those activities evaluated as significant were then monitored using the management control and mitigation measure established for each activity where the significant impacts occurred. The EAI assessments had included the identification of aspects and impacts from resulting from the POM and Estate operations. At the POM, specific impacts identified include smoke emissions, noise levels, POME and EFB management. 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 EIA established practice. Due to no changes identified in the mill operation, therefore no timetable for any change is required. 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 the Estates, 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.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
			<p>The organization had established Environmental Aspect Impact (EAI) Identification and Evaluation covering all estates activities such as Spraying, Manuring, harvesting maintenance of vehicle & equipment, Buildings construction, raw water treatment plant, nursery, and replanting operations. At the POM, specific impacts identified include smoke emissions, noise levels, POME and EFB management. 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 EIA established practice. Due to no changes identified in the mill operation, therefore no timetable for any change is required. 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. Environmental management and monitoring plans have been developed with participation of affected stakeholders during stakeholders meetings in Jan & Feb 2022.</p> <p>The SIA was prepared in combination with Saremas 1 CU. Based on the report and attendance record, the SIA was carried out with the participation of the relevant stakeholders such as contractors and suppliers, government agencies, estate and mill workers, the neighbouring five long-house communities, Rumah Bunsu, Rumah Gundi, Rumah Tapu (Saremas 1), Rumah Sabang (Suai) and Rumah Merudi (Suai). It has been confirmed that there was no long-houses community surrounding Saremas 2 CU.</p> <p>The social management and monitoring plans are being reviewed and updated on an annual basis. This takes into account inputs from external stakeholder meetings, Social & Welfare Committee meetings, as well as Women & Children Committee meetings. Among the social issues for management and monitoring were canteen prices, safety issues related to heavy machineries passing by the workers' housing, making sure PPE replacement is always available, replacement of old workers' housing, and documentation and immunisation of foreign workers' children. The social management and monitoring plans at Saremas 2 CU are being reviewed and updated on an annual basis. This takes into account inputs from external stakeholder meetings, Social & Welfare Committee meetings, as well as Women & Children Committee meetings. Among the social issues for management and monitoring were canteen prices, safety issues related to heavy machineries passing by the workers' housing, making sure PPE replacement is always available, replacement of old workers' housing, and documentation and immunisation of foreign workers' children. Sighted the Plan has been updated in Jan 2022.</p>
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	YES	<p>All estates and mill at Saremas 2 CU were able to demonstrate that the SIA management and monitoring plans are being updated annually. At Saremas 2 Palm Oil Mill, the action plan was updated in Jan 2022. Evidence is also available that the review was done in a participatory way taking into account inputs from meetings with external stakeholders, Social & Welfare Committees and Women & Children Committees. At the Saremas 2 Palm Oil Mill, the Social & Welfare Committees had raised the issue of garbage bin are not properly place, and Women & Children Committees on fencing for creche area.</p> <p>All estates at Saremas 2 CU were able to demonstrate that the SIA management and monitoring</p>

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings																																
			plans are being updated annually. At the Saremas 2 Estate, the management plan was reviewed and updated accordingly. Evidence is also available that the review was done in a participatory way taking into account inputs from meetings with external stakeholders, Social & Welfare Committees and Women & Children Committees.																																
3.5 A system for managing human resources is in place.	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.	YES	Employment procedures which include recruitment, selection and hiring are contained in a document entitled Recruitment of Workers. 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 which include recruitment, selection and hiring are contained in a document entitled Recruitment of Workers. 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. Based on the sampling of the workers' employment contracts and personal files, there is evidence that the employment procedures on recruitment, selection, hiring, promotion are implemented. Records are also maintained in each worker's individual file. Hiring process begins with newspaper advertisement, employee referrals, review of candidate's resume, job application, shortlisting, reference checks, interview, medical check-up and issuance of offer letter. Promotion would be recommended based on evaluation of behavior, performance appraisal and current work results. No termination had occurred so this element of the procedure could not be verified during the audit.																																
3.6 An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	YES	<p>HIRARC for the mill was formalized since 2008 with review made annually. The significant and routine activities for mill were adequately covered with details as follows;</p> <table border="1"> <thead> <tr> <th></th><th>Areas/Activities (Mill)</th><th></th><th>Areas /Activities</th></tr> </thead> <tbody> <tr> <td>1</td><td>Reception –Weighbridge</td><td>8</td><td>Engine Room</td></tr> <tr> <td>2</td><td>Fruit Handling</td><td>9</td><td>Product storage</td></tr> <tr> <td>3</td><td>Sterilizer</td><td>10</td><td>Laboratory</td></tr> <tr> <td>4</td><td>Threshing</td><td>11</td><td>Water treatment</td></tr> <tr> <td>5</td><td>Clarification / Oil Room</td><td>12</td><td>Effluent Treatment Pond</td></tr> <tr> <td>6</td><td>Boiler House</td><td>13</td><td>Crop reception – Ramp</td></tr> <tr> <td>7</td><td>Confined space</td><td>14</td><td>Working at height</td></tr> </tbody> </table> <p>Latest updated and reviewed in Dec 2021 was related to installation of new equipment Electrostatic Precipitator (ESP) to eliminate the oil mist or dust from boiler operation.</p>		Areas/Activities (Mill)		Areas /Activities	1	Reception –Weighbridge	8	Engine Room	2	Fruit Handling	9	Product storage	3	Sterilizer	10	Laboratory	4	Threshing	11	Water treatment	5	Clarification / Oil Room	12	Effluent Treatment Pond	6	Boiler House	13	Crop reception – Ramp	7	Confined space	14	Working at height
	Areas/Activities (Mill)		Areas /Activities																																
1	Reception –Weighbridge	8	Engine Room																																
2	Fruit Handling	9	Product storage																																
3	Sterilizer	10	Laboratory																																
4	Threshing	11	Water treatment																																
5	Clarification / Oil Room	12	Effluent Treatment Pond																																
6	Boiler House	13	Crop reception – Ramp																																
7	Confined space	14	Working at height																																

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	YES	The implementation of OSH plan was monitored by several programmed such as: <ul style="list-style-type: none"> • safety inspection twice per month, • workplace inspection quarterly • and internal audits conducted by officers from sustainability unit - annually • safety briefing during morning muster – daily • training programmed
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 and workers which took into account gender-specific needs, and which covered applicable aspects of the RSPO P&C was available on all 3 Estates and Seramas 2 POM. Regular assessments of training needs were prepared by HR Department and transferred down to the estates and mills for implementation. Training needs are formalised using <i>training needs assessment form</i> . Training needs identification matrix has been established with target dates for the training to be conducted. However, it was found that, the training related to environmental especially on protected, including maintaining and restoring appropriate riparian and other buffer zones was not appropriately trained to the staff and workers. Based on site inspections and interviews workers at Saremas 2, Segarmas and Kaminsky Estate all of the workers interviewed still lack of awareness on BMPs for the management and rehabilitation of riparian reserves. Thus, Major NCR DA 02 2020 has been raised.
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	YES	Records of training are maintained, where appropriate on an individual basis at Saremas 2 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	Refreshment training for RSPO SCCS has been conducted in Nov 2021 by sustainability office from HQ to clerk, weighbridge operator, lab operator, mill engineer, electrician, process operator, AP. Training for contractor transporter has been conducted in Jan 2022 to their director, supervisor, and manager.

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</p> <p>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</p> <p>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>	YES	Saremas 2 Palm Oil Mill (S2POM) sourced for their FFB only from estates under the same CU which involve, Saremas 2 Estate, Segarmas Estate, and Kaminsky Estate.
3.8.2	<p>Mass balance Module</p> <p>A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base.</p>	YES	Not applicable since this mill used IP model.
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 estimated tonnage for CPO & PK products were provided in this report (refer Table 4)

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	Member Name Member Name: Saremas POM II - PPB Oil Palms Bhd - Wilmar Holding Name: WILMAR TRADING PTE.LTD License Information Commodity: Palm Oil RSPO Membership Number: 2-0017-05-000-00 Type of Business: Oil mill License Status: Active Supply Chain Model: Identity Preserved
3.8.5	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: <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. • The site shall have documented procedures for receiving and processing certified and non-certified FFBs. 	YES	Saremas 2 POM Organizational, management systems and the operational systems, documented policies and procedures of the organization holding certification, are sufficient and adequately implemented to meet the intent and requirements of the RSPO Supply Chain Certification Standard. Sighted Saremas 2 palm oil mill has updated and change the name of documented procedure named RSPO Supply Chain Certification Procedure, doc no: SOP S2POM-RSPO-SCC, rev 3, dated 01 Sept 2020. Among the documented requirements related to Mill Supply Chain definition, delivery of FFB to mill, delivery of CPO and PK to refinery, mass balance calculation, daily production report, checking validity of the certification of the suppliers, Internal Audit, Management Review. There was no evidence that Saremas 2 POM seeking certification outsources activities to independent third parties.

RSPO PUBLIC SUMMARY REPORT

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.6	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <p>Conforms to the requirements in 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. 	YES	<p>RSPO internal audit was conducted based on SOP Internal audit, in Nov 2021 by the internal auditor. The internal audit has followed the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. There are 0 nonconformance report (NCR). Audit Attendance sheet, audit plan, audit notes, was sighted by auditor.</p>
3.8.7	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	YES	<p>Available, as reported in the main report. Based on verification of data through RSPO IT Platform and those recorded by S2POM, no overproduction occurred.</p>

RSPO PUBLIC SUMMARY REPORT

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single-documents or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documentation and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of buyer; b) The name and address of the seller c) The leading or shipment/delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation i) A unique identification number 	YES	<p>The procedure in handling of sale and delivery was sighted and found adequate. Sales activities usually handled by PPB Oil Palms Berhad and Marketing Department (HQ) on behalf of Saremas 2 POM.</p>

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>a) There are 3 outsource company CPO and PK transporter i.e. Pengangkutan Lean Soon Hung (S'wak) Sdn Bhd), BTU Palm Oil Transport Sdn Bhd and Farjaya Shine Sdn Bhd. sighted an agreement has been made in Feb 2022.</p> <p>b) There was a contract document between Saremas 2 POM and the transporters. Access to the outsourcing contractor or operation if an audit is deemed was stated in contract point no. 19 – certification compliance</p> <p>c) Auditor has verified evidence attached of documents revision RSPO Supply Chain Certification Procedure dated 01/02/2020. The revision has included explicit procedures for the outsourced process under clause 4 Outsourcing. Therefore, past NCR RAR 03 2020 was successfully closed</p> <p>d) Inspection was carried out as additional effort to ensure no contamination sighted book at AP Post.</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 contractors had been updated accordingly and had included the appointed transporter.
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	Not available.
3.8.12	i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	YES	S2POM was noted to have well-maintained their records and reports covering all aspects of the standard requirements.
	ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	YES	It had been described in their SOP for Sustainable Supply Chain & Traceability that records and reports shall be kept for more than 2 years.
	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	S2POM has maintained to record receipts of RSPO certified FFB and deliveries of RSPO certified CPO & PK using three monthly basis was sighted that all the data were found up to date.
	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.	YES	Not applicable

RSPO PUBLIC SUMMARY REPORT

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>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</p> <p>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	Based on nature of their processing activities, S2POM's conversion factor shall be based on their oil extraction rate (OER) and kernel extraction rate (KER). These rates being monitored on daily basis as part of their process performance evaluation and consolidated at month end.
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</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm</p>	YES	<p>S2POM shall only receive the RSPO certified FFB which are from Saremas 2 CU own estates – same CU. Monitoring records titled as “SPOM2 FFB Received” has recorded the tonnage of certified FFB and other relevant process details.</p> <p>Verified through WB.Net system and random sample of weighbridge tickets, being found that no external FFB intake occurred, hence no downgrade required. Consecutively, it is confirmed that RSPO certified oil palm product is from the certified sources. As for transport, dedicated tankers had been allocated by</p>

RSPO PUBLIC SUMMARY REPORT

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	products, including during transport and storage to strive for 100% separation.		service provider to prevent cross contamination.
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform</p>	YES	<p>S2POM through usually handled by PPB Oil Palms Berhad and Marketing Department (HQ) on behalf of Saremas 2 POM. Personnel updated the RSPO IT platform system upon confirmed contract.</p> <p>The registration of transaction being carried out by Group Plantation Marketing subordinate detail aof ID as pe below:</p> <p>Transaction Report Member Name: Saremas POM II - PPB Oil Palms Bhd - Wilmar RSPO Member Number: 2-0017-05-000-00 Last License: CB105969 Status: Active</p>
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	YES	Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. Saremas 2 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	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is documented and communicated to all	YES	The Human Rights Policy and Human Rights Framework provides for protection for HRD and Whistle blowers and states that no reprisals would be taken against whistle blowers and HRDs. Similarly, the Whistleblowing Policy also aims to protect whistle blowers from reprisals or victimisation.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
rights, which includes respecting the rights of Human Rights Defenders.	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.		The understanding among all levels of workforce, operations and local communities of what HRD and the prohibition against retaliation towards HRDs was increased. It was noted that all of them were aware and understood related to HRD policies.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	YES	As observed during the audit and during interviews held, there is no evidence of violence instigation, harassment or use of mercenaries or paramilitaries in any of the operations at Saremas 2 CU.
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.	4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	YES	Evidence is available of a system open to all affected parties, ensuring anonymity of complainants. This system is known as Dispute and Resolution Procedure. This procedure applies to negotiation procedures involving external and internal stakeholders, and also explains the Group's conflict resolution process in a flowchart. Protection for HRD and community spokesperson is also provided under the Wilmar Group's Whistleblower Policy. Anonymity of complainants and whistleblowers are ensured under the Saremas 2 CU Code of Business Conduct which provides an avenue to direct the grievances to a Hotline number, toll-free numbers, email, fax, or letters to the Whistleblowing Unit at HQ.
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	YES	Procedures are in place to ensure affected parties understand the Dispute and Resolution Procedures. Verbal explanation is given in an easy-to-understand language accompanied by pictorial explanations, and where relevant, flowcharts. If necessary, senior foreign workers who could speak and understand the Bahasa Malaysia act as translators to their other colleagues, especially the newly arrived ones.
	4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	YES	There is evidence that Saremas 2 CU keeps parties to a grievance informed of progress. Verified were the complaints received from workers on housing defects and recorded in the complaints book. Also recorded in the complaints book was the Manager's approval for repair given, update of the repair progress and acknowledged by the complainant by appending his signature in the complaint book.
	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	YES	The conflict resolution mechanism does have an option for aggrieved parties to have the option for representatives of their choice. This is contained in Clause 6.2 (iii) of the Dispute and Resolution Procedure.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	observers, as well as the option of a third-party mediator.		
4.3 The unit of certification contributes to local sustainable development as agreed by local communities.	4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.	YES	Saremas 2 CU is able to demonstrate that contributions to community development have been made based on consultation results with the local communities. Among them include: <ol style="list-style-type: none"> 1. Request from SK Suai 1 to transport pupils for a school camp. 2. Request from Rh Rantau ak Tapu to build a road and to dig a waste disposal area. Heavy machinery was provided as requested. 3. Request from Rh Golan for the construction of a culvert near Rh Golan. Culverts and heavy machinery were provided as requested. 4. Employment opportunities for the locals subject to vacancy and suitability.
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 Saremas 2 Estate was verified. The estate was confirmed to be operating on land of with legitimate status. The Saremas 2 Estate hosts the site of the Saremas 2 Mill complex. The documents related to the right to use the land was made available to the audit team. Records of ownership were maintained at respective estate's office. This plantation area was previously owned by Sarawak State Government.
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	YES	Saremas Sdn Bhd (SSB) has entered into a Memorandum of Understanding with the indigenous Iban community residing in a longhouse within the plantation of SSB on Lot 49, Sawai Land District, Miri Division, Sarawak. The MoU was entered with their free, prior and informed consent in August 2008. This MOU was signed by Tuai Rumah (Rumah Tapu), SSB representatives, witnessed by the Group Manager. In this MoU, SSB has allowed the local Iban community to occupy, conduct livelihood, cultivate settlement area, maintain burial grounds and practice all native customs and rites, consume or trade all the fruits and their cultivation. Included also are their rights to hunt and gather other forest produce naturally necessary for their culture and sustenance.
	4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.	YES	

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	
	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	All related documentation and records of meeting regarding the land acquisition was kept in Saremas 2 Office and has been verified by the auditor.
	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 related documentation and records of meeting regarding the land acquisition was kept in Saremas 2 Office and was verified by the auditor.
	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	There is evidence that communities are represented through institutions or representatives of their own choosing, including legal counsel.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	YES	Since 2014, land claim was made by a group of Penans Community of Jambatan Suai. Two groups from the same origin claimed over 62,687 ha of land. The areas involved 22,129 ha overlapping with Saremas 1 & 2, Segarmas Estate, Suai Estate and Kaminsky Estate. Detailed assessment was available in the confidential version of this report. During assessment in 2022, it has been observed during the audit, there are no new meeting and claim, as the Penan Community has accepted the decision made by the court. As of to date, no new claim has been made.
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 title, there was no new plantings are established on local peoples' land. It has been verified that the land is legitimately owned by Wilmar Saremas 2 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 2 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 neighbouring estate.
	4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Wilmar Saremas 2 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 neighbouring estate.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.		
	4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Wilmar Saremas 2 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 neighbouring estate.
	4.5.5 Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	YES	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Wilmar Saremas 2 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 neighbouring estate.
	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 reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Wilmar Saremas 2 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 neighbouring estate.
	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.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with thru a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	YES	For cases involving the loss of customary land rights, the estate will manage them using the procedure entitled "Process for Identification of Legal and Customary Rights and Identifying People Entitled for Compensation". 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)".
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	YES	In accordance with the "Dispute and Grievances Procedure", the procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established. However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers at mill and visited estates.
	4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.	YES	There were no scheme small holdings at Saremas 2 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	As of the date of the Audit, Saremas 2 and Segarmas Plantation Sdn Bhd were in the process of a conflict resolution with the Penans of Jambatan Suai. As of to date, no negotiated agreements or compensation claims have taken place.
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for	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 in the document entitled "Process for Identification of Legal and Customary Rights and Identifying People Entitled for Compensation" version 1.0. In it, the process of determining compensation was addressed and 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)".

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			In accordance with the Dispute and Grievances Procedure, the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department at the Wilmar Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	YES	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 neighbouring 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	During site visit at Saremas 2 CU there was no new planting. It has been observed during the audit, the Court of Appeal had decided on 18 October 2018 that the previous Court case filed on 5 September 2016 by Penan of Kg Jambatan Suai at the Miri High Court against Saremas Sdn Bhd and 7 others be withdrawn with no liberty to file afresh. This means that the Plaintiff is prohibited from commencing a fresh legal action against the Defendants on the same matter again. The withdrawal of the suit was made pursuant to an earlier Federal Court decision which held that the Plaintiff's claim for Pulau Galau and Pemakai Menoa had failed. Saremas Sdn Bhd (SSB) has entered into a Memorandum of Understanding with the indigenous Iban community residing in a longhouse within the plantation of SSB on Lot 49, Sawai Land District, Miri Division, Sarawak. The MoU was entered with their free, prior and informed consent on 4 August 2008. This MOU was signed by Tuai Rumah (Rumah Tapu), SSB representatives, namely Assistant General Manager, Mr Kiaw Che Weng. This MoU was witnessed by the Group Manager. In this MoU, SSB has allowed the local Iban community to occupy, conduct livelihood, cultivate settlement area, maintain burial grounds and practice all native customs and rites, consume or trade all the fruits and their cultivation. Included also are their rights to hunt and gather other forest produce naturally necessary for their culture and sustenance.
4.8 The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.	4.8.1 Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	YES	As above.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	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	
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).	YES	
	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	

RSPO PUBLIC SUMMARY REPORT

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	At Saremas 2 CU, Fresh Fruit Bunches were supplied from Wilmar International Limited owned estates which are certified to RSPO. There was no third-party FFBs sent to the mill. Thus, no contract involved with smallholder.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	YES	As above.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	YES	As above.
	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 2 CU, Fresh Fruit Bunches were supplied from Wilmar International Limited owned estates which are certified to RSPO. There was no third-party FFBs sent to the mill. Thus, no contract involved with smallholder, and this indicator was not applicable to this CU.
	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.	YES	Weighing Equipment in Saremas 2 POM has been calibrated by yearly basis using accredited weighing company Metrology Corporation Malaysia Sdn Bhd.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	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	<p>Wilmar International Limited 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.</p> <p>However, at Saremas 2 CU, at the time of Audit, there were no Independent Smallholders with certification yet.</p>
	5.1.9 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	YES	A grievance mechanism which respects anonymity and protects complainants is in place at the Saremas 2 CU as per Relevant policy titled 'Whistleblowing Policy', " <i>No Deforestation, No Peat, No Exploitation Policy</i> " and Procedure namely "Dispute & Resolution Procedure", "Flowchart of Conflict Resolution". As at to date there is no complaint by stakeholders.
5.2 The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.	5.2.1 The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	YES	At Saremas 2 CU, Fresh Fruit Bunches were supplied from Wilmar International Limited owned estates which are certified to RSPO. There was no third-party FFBs sent to the mill. However, management of Saremas Complex's (Saremas 1 & 2 CU) conducted a consultation with smallholder surrounding the estate through stakeholder meeting "community-based development committee (CBDC)", in Feb 2022.
	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	Saremas Certification Unit has conducted stakeholder meeting in Feb 2022. In the minutes meeting reported that Saremas CU has conducted briefing related to OER calculation, quality of FFB, programme fertilizer credit to smallholders, GIS mapping programme for smallholder, road maintenance programme for smallholders, market day during payday, etc. Saremas 2 CU has showed their commitment to develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies as above.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	YES	At Saremas 2 CU, Fresh Fruit Bunches were supplied from Wilmar International Limited owned estates which are RSPO certified. There was no third-party FFBs sent to the mill.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	YES	There was no scheme smallholder at the Saremas CU. However, sighted an evidence training for smallholders has been carried out by Saremas CU complex's collaborate with chemical company in Dec 2021.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	YES	At Saremas 2 CU, Fresh Fruit Bunches were supplied from Wilmar International Limited owned estates which are RSPO certified. There was no third-party FFBs sent to the mill. The smallholder support programme has been briefed during stakeholder meeting. It was conducted and reviewed by yearly basis.

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	Saremas 2 CU subscribes to Wilmar's Equal Opportunity Policy. This policy sets out the CU's position on equal opportunity in all aspects of its employment including recruitment, training and promotion. It was publicly available at all estates and the Mill. The policy statement emphasised its support for the principle of fairness and non-discrimination, and aims to treat individuals with dignity and respect, free from unlawful and unethical discrimination. In particular, it aims not to discriminate on gender, race or ethnic origin, disability, sexual orientation, age, or faith; but to build a global and able workforce that is based on meritocracy.
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.	YES	Evidence is available that no employee has been discriminated against. This is evident from sampled employment contracts where all workers, (male, female, foreign, local) signed the same employment contract. Workers interviewed also confirmed that they face no form of discrimination.
	6.1.3 The CU demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	YES	As stipulated in the "Recruitment selection, Hiring and Promotion" for staff and "Recruitment of Workers" for workers the recruitment selection, hiring and promotion where relevant are based on availability, skills, capabilities, qualities, and medical fitness necessary for the jobs.
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	YES	Based on documents, confirmed by the Health Assistants and workers, pregnancy tests were conducted when the workers presented themselves at the estate clinic and the tests are not conducted in a discriminatory manner. All workers who have been tested as pregnant will be required to undergo medical tests at the nearest government clinic or the VMO's private clinic. Alternative equivalent employment is also offered for pregnant women.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	YES	The gender committees throughout the Saremas 2 CU are known as the Women and Children Committees. Membership comprises female employees and the employees' wives. Based on interviews of the committee members and review of meeting minutes, the Committees main activities are to provide awareness to its members on issues of concern. These relate to sexual harassment, domestic and other forms of abuse, children's health, creche hygiene, no sick children at the creche, children' immunization and education, as well as women's reproductive rights, maternity benefits and leave entitlement. Meetings are generally held every 4 to 6 months.
	6.1.6 There is evidence of equal pay for the same work scope.	YES	Saremas 2 CU subscribes to Wilmar's Equal Opportunity Policy. This policy sets out the CU's position on equal opportunity in all aspects of its employment including recruitment, training and promotion. It was publicly available at all estates and the Mill. The policy statement emphasised its support for the principle of fairness and non-discrimination, and aims to treat individuals with dignity and respect, free from unlawful and unethical discrimination. In particular, it aims not to discriminate on gender, race or ethnic origin, disability, sexual orientation, age, or faith; but to build a global and able workforce that is based on meritocracy. Saremas 2 CU was able to demonstrate the implementation of this Policy as confirmed by all workers interviewed (local, foreign, male, female, new and old hires) that all workers irrespective of race, origin, age, gender and faith receive equal treatment.
6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).	6.2.1 (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.	YES	The employment contracts issued to all Saremas 2 CU workers (local and foreign) have been prepared in Bahasa Malaysia and are available to the workers. The documents have been the prepared and contains all the requirements of the Sarawak Labour Ordinance. Pay conditions are also contained in the employment contracts. The documentation of pay is available in the form of monthly pay slips which are given to all employees. Interviews conducted with the workers confirmed their understanding of the employment contracts and pay slips. If they have any doubts, they will refer to the office or their supervisors. Briefings on the employment contracts and pay slips and calculation of pay and minimum wages were also given to the workers.
	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, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll doc give accurate information on compensation for all work performed. This includes a form of record for work done by family members.	YES	The employment contracts signed between Saremas 2 CU management and their employees were in compliance with the Sarawak Labour Ordinance.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	YES	Evidence is available at Saremas 2 Oil Palm Mill that regular working hours as determined by the Sarawak Labour Ordinance and stipulated in employment contracts are being adhered to. Any work in excess of 8 hours is being compensated as overtime. This is based on punch cards and pay slips reviewed, and interviews held with workers at the Saremas 2 Palm Oil Mill. Workers who have been certified ill are given paid medical leave, and this is the same for workers who have gone on maternity were given 2 months paid maternity leave.
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.	YES	Evidence is available that Saremas 2 CU provides adequate housing and facilities in accordance with the requirements of the Workers' Minimum Standard of Housing and Amenities Act 1990. All workers are provided with free accommodation as stated in their employment contracts, and free electricity and water supplies. All the houses are generally in a good state of repair. Each house has between 2 to 3 rooms, and each room occupied by 1 or 2 persons. Each worker and staff housing area come with amenities such as HUMANA for foreign workers' children, creche, badminton/takraw/volleyball court, places of worship, sundry shops, and playing field. Clinic facilities are also available and medical treatment is provided free of charge to all employees and their dependents. Records also show that linesite inspections are being carried out at least once a fortnight by the Health Assistants sometimes together with the Visiting Medical Officer in accordance with the Workers' Minimum Standard of Housing and Amenities Act 1990 (Amended 2019).
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	YES	Saremas 2 CU was able to demonstrate that efforts are taken to improve workers' access to adequate, sufficient and affordable food. All units within Saremas 2 CU have their own canteen/grocery store which sells items such as eggs, flour, rice, vegetables, frozen food such as fish, meat, onions, etc. Items seen in the stores are adequate, clearly labelled and within the expiry dates. Prices of certain basic items are monitored regularly by the estates.
	6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. 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	YES	Saremas 2 CU had calculated the prevailing wages and in-kind benefits for their workers. The calculation included housing, electricity, water, transport to work, sports and recreation facilities, education, childcare and healthcare. The auditor had verified the calculation and though the calculation was in line with RSPO Guidance on Calculation Prevailing Wages.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	<p>following:</p> <ul style="list-style-type: none"> • An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers. • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment. • The unit of certification may choose to implement the "living wage" payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation <p>Until such time where the Malaysian version of "decent living wage" has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid.</p>		
	6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	YES	Generally, permanent and full-time employees are used to carry out core work such as harvesting, loose fruit collecting, sprayers and manurers. Based on all sampled workers, there was no casual workers or temporary worked in all estates.
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.	6.3.1 (C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.	YES	A published statement recognizing freedom of association is available. It is contained in Clause 3xvi of Wilmar's No Deforestation, No Peat, No Exploitation Policy. These rights include those of personnel to form and join trade unions of their choice, and to bargain collectively. It also states that where the right to freedom of association and collective bargaining is restricted by law, parallel means of independent and free association and bargaining are made available for all such personnel. This Policy is available in English and Bahasa Malaysia, and explained to the workers during muster briefings
	6.3.2 Minutes of meetings between the unit of certification with trade unions or	YES	There are no trade unions at Saremas 2 CU, but the Workers' Welfare and Social Committees have been established at every unit. The Committee comprise management and worker

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
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.	workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.		representatives. Evidence is available that management holds regular meetings with the Workers' Welfare and Social Committees. Meeting minutes between management representatives and workers' representatives were evident.
	6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	YES	Evidence is available that workers' representatives that sit in the Workers' Welfare and Social Committees have been independently and freely elected by the workers themselves. No evidence of any management interference was observed. Records show that worker representatives were nominated by their fellow workers via an election process.
6.4 Children are not employed or exploited.	6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	YES	Saremas 2 CU subscribes to Wilmar's Child Labour Policy updated in September 2010. The Policy states that it would not tolerate the use of child or forced labour, nor exploitation of children in any of its global operations and facilities. Wilmar's Child Protection Policy which was last reviewed in January 2018 states that Wilmar does not tolerate child labour, any forms of child exploitation and child abuse.
	6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	YES	Based on documentation review (master checkroll, personal files containing copies of passport, KTP or Malaysian IC), interviews conducted and observations in the field, all employees were above the age of 18 when they commenced work at Saremas 2 CU. Evidence is available that minimum age requirements are met. Documented age screening procedure is available from copies of passport and Malaysian NRIC, and copies of Indonesian workers' identity card known as KTP.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	YES	Saremas 2 CU has a guidance document which defines young person as someone between 15 to 18 years of age and is only applicable for employment of local workers. The guidance document also lists out the types of work that can be considered for a young person to be employed. This includes house cleaning, weighbridge clerk, gardening, loose fruit picking (excluding loading), FFB checker, filling polybags, EFB mulching, creche helper, sundry shop helper, and line sweeping.
	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	YES	Communication of Wilmar's Child Protection Policy dated January 2018 which states that the company does not tolerate child labour, any forms of child exploitation and child abuse was given to external stakeholders during stakeholder meeting of Saremas 2 CU in Dec 2019. Policy briefings to workers, and during induction trainings for new workers.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	key staff, smallholders, FFB suppliers and communities where workers live.		
6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.	6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	YES	A Policy against sexual harassment dated June 2014 and update in January 2018 has been established. The Policy known as Sexual Harassment, Violence and Abuse, Reproductive Rights Policy updated 2014 and signed by the Group Plantation Head and Group CSR Head. It defines and gives examples of sexual harassment, violence and abuse, (e.g. where any person is threatened, abused, intimidated or assaulted in his or her employment). This includes physical attacks, threatening behaviour, and verbal abuses, written threats of emotional/psychological nature. Sexual harassment as defined in the policy also is an action that can be made either implicitly or explicitly, and or made a term or condition of an individual's continued employment, career advancement or promotion. This Policy is used to guide procedures to be taken in the event of sexual harassment incident, and communicated to all staffs and workers during morning muster and via the Women and Children Committee meetings.
	6.5.2 (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	YES	A Policy to protect reproductive rights of all, especially women is implemented. This Policy known as Sexual Harassment, Violence and Abuse, Reproductive Rights Policy updated 2014 and signed by the Group Plantation Head and Group CSR Head. The Policy gives the employees the right to decide freely and responsibly of their planning to have children, and to make decisions concerning reproduction free of discrimination, coercion and violence. During this audit, no new mothers were available to verify the Indicator. However, based on interviews held with other female workers who had given birth before, their needs have been taken into account such as providing a private place for expressing milk and access to a fridge for storage, and permission granted enabling them to go home to breastfeed their babies.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	YES	Saremas 2 CU has an SOP entitled 'Anti Sexual Harassment'. This SOP provides a reporting form called the 'Grievance/Complaint Form for Sexual Harassment' which could be used by complainants to lodge a report. The SOP also contains the complaint and investigation procedure to handle sexual harassment in the workplace. This SOP were communicated to all staffs and workers during morning muster and training.
	6.5.4 A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	YES	A Policy against sexual harassment dated June 2014 and update in January 2018 has been established. The Policy known as Sexual Harassment, Violence and Abuse, Reproductive Rights Policy updated 2014 and signed by the Group Plantation Head and Group CSR Head. It defines and gives examples of sexual harassment, violence and abuse, (e.g. where any person is threatened, abused, intimidated or assaulted in his or her employment). This includes physical attacks, threatening behaviour, and verbal abuses, written threats of emotional/psychological nature. Sexual harassment as defined in the policy also is an action that can be made either implicitly or explicitly, and or made a term or condition of an individual's continued employment, career advancement or promotion. This Policy is used to guide procedures to be taken in the event of sexual harassment incident, and communicated to all staffs and workers during morning muster and via the Women and

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
			Children Committee meetings.
6.6 No forms of forced or trafficked labour are used.	<p>6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty to the workers for termination of employment • Debt bondage • Withholding of wages 	YES	<p>Based on interviews conducted with foreign workers, review of documents signed by workers agreeing to voluntarily keep their passports at the estate /mill office, as well as observations made, there is evidence that workers are given an option to either keep their own passports, or to keep them at the office. Those who chose to keep the passports at the office, keep them in locked pigeonholes with one key each kept by the worker, and one by the office. Workers have full access to their own passports and have given written confirmation of their agreement to keep their passports with the office.</p> <p>The Estates and Mill do not charge their workers recruitment fee as mentioned under Indicator 6.1.2 above. Their SOP states that the Company shall bear travelling costs, accommodation, food and drink, during transit and application process for the worker which must be agreed earlier at a fixed rate with the recruiting agent. The Company is also responsible for worker levy, medical check-up, work pass, agency processing fees and insurance. The worker only pays fees related to passport renewal. This breakdown in payment is agreed between the hiring Company and the recruitment agents. There is no form of contract substitution. All foreign workers interviewed confirmed that while still in their home countries, they were briefed by the recruitment agents of the types of job they would be doing in Malaysia.</p>
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	YES	<p>There is a special labour policy and procedures established known as "Recruitment of Workers". This document spells out the recruitment process from:</p> <ol style="list-style-type: none"> a. Manpower planning – applying for quota, appointment of recruitment agent, sourcing of workers, workers interviews, satisfaction of employability criteria, shortlisting. b. Recruitment process – registration onto the approved Employee Master list and uploaded onto the SAP system. c. Orientation – briefing on language, safety procedures, labour laws, culture practices, surrounding community, housing, medical, amenities, issuance of PPE. d. Commencement of work – no discrimination, no contract substitution practices, post-arrival orientation programme and provision of decent living conditions.
6.7 The unit of certification ensures that the working environment under its control is safe and without undue risk to health.	6.7.1 (C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.	YES	<p>Mill Managers were appointed as the Chairman of the ESH committee. The letter of appointment for the Managers signed by the Regional Assistant General Managers was sighted. The Managers subsequently assigned duties of ESH coordinator to the Assistants for the down line implementation of ESH practices in the estates/mill. Similar appointment was made for all the estates and the mill. All identified Executives were officially given a letter for such an appointment. The estates and the mill management conduct regular two-way communication with their employees through the quarterly ESH meeting. Workers during the meeting participated in the discussion mainly on housing and safety. The agenda as discussed during the meeting among others includes the following;</p>

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
			<ul style="list-style-type: none"> • <i>Pengesahan minit mesyuarat lalu</i> • <i>OSH committee issues</i> • <i>Pembentangan dari setiap komuniti</i> • <i>Training</i> • <i>Safety & health updated</i> • <i>Accident statistic</i> • <i>Certification status</i> • <i>Others matters</i> <p>Estate Managers were appointed as responsible person(s) for safety and health issues and also chairman for OSH Committee. The Manager subsequently assigned duties of ESH coordinator to the Assistants or healthcare assistant for the down line implementation of ESH practices in the estate and mill. All identified Executives were officially given a letter for such an appointment. Records of regular meetings between the responsible person and workers to discuss about health and safety had been verified to the satisfactory maintained. OSH Committee meetings confirmed that among the agenda discussed, included the following:</p> <ul style="list-style-type: none"> ▪ Passing of previous minutes and arising matters. ▪ Accident report (Monthly Data of Mill/Estate Safety Performance) ▪ Workplace inspection ▪ Safety report and programme ▪ COVID 19 issues
	6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.	YES	<p>Emergency Response Plan (ERP) was established since 2009. A revision on the ERT was made in 2015. Random interview with the estate workers showed that they were aware of accident and emergency procedures. Copies of procedures and telephone numbers were sighted on notice boards and muster grounds.</p> <p>During site visit, it was sighted Emergency Response Plan was available at Boiler Station, Sterilizer Station, Chemical Store, Workshop, Lubricant Store, laboratory, etc. During interviews with workers it was noted that all workers understand regarding ERP.</p> <p>First aid training was conducted annually at Saremas 2 POM by Hospital attendant was sighted and reviewed. Master list of first aid box of all estates and mill which is available at the office was checked and verified. Observed that, first aid box is well provided and located at every workstation.</p> <p>The content available in the first aid boxes such as bandage, gauze, triangular bandage, cotton wool, plaster, handy plaster, flavin lotion, antiseptic cream, surgical gloves and scissor were well equipped. The stock of first aid box is regularly check and refill, when necessary, by estate Hospital Assistant.</p> <p>Telephone numbers and names of the members of the Emergency Response Team (ERT) were communicated to all employees and displayed at notice boards. Telephone numbers of the PIC, Police Station, Fire Brigade, and Government Clinic were also included. Accident statistics were</p>

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings																		
			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. 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. Accident statistics were being maintained in a satisfactory manner and periodically reviewed. Accident/injury record were recorded by monthly basis 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	<p>Training and briefings on the operations were provided for workers to educate them on safe working practices to ensure applicable precautions are adhered. Training for employees are conducted from time to time based on needs through various method such as on the job training, briefings, meetings, etc. The staff and workers such as the storekeepers, Mill workers, harvesters, pruners, field workers, sprayers, fertilizer and rat bait workers were trained, and they had understood the hazards involved and how the chemicals should be used in a safe manner. Based on the HIRARC carried out at the estates and mill the PPE types for the various activities has been identified and implemented. Monitoring via Personal Protective Equipment Card and verified.</p> <table><tr><th></th><th>Job category</th><th>PPE issued</th></tr><tr><td>1</td><td>Harvester</td><td>Safety helmet, sickle cover, hand glove. Wellington boots</td></tr><tr><td>2</td><td>Sprayers</td><td>Respirator, nitrile glove goggles, wellington boots, apron.</td></tr><tr><td>3</td><td>Fertilizer applicator</td><td>Apron, wellington boots, dust mask, nitrile glove.</td></tr><tr><td>4</td><td>Mill operator</td><td>Safety boots, ear muff, safety vest, helmet, cotton glove</td></tr><tr><td>5</td><td>WTP operator</td><td>Safety boots, muff, safety vest, helmet, cotton glove, dust mask</td></tr></table> <p>All staff and workers such as the storekeepers, harvesters and sprayers/manurers were continuously trained in safe working practices including SSOP for PPE related to their job function. Appropriate PPE were given to workers based on HIRARC and SSOP recommendations suitable for the job position or hazardous operation undertaken.</p>		Job category	PPE issued	1	Harvester	Safety helmet, sickle cover, hand glove. Wellington boots	2	Sprayers	Respirator, nitrile glove goggles, wellington boots, apron.	3	Fertilizer applicator	Apron, wellington boots, dust mask, nitrile glove.	4	Mill operator	Safety boots, ear muff, safety vest, helmet, cotton glove	5	WTP operator	Safety boots, muff, safety vest, helmet, cotton glove, dust mask
	Job category	PPE issued																			
1	Harvester	Safety helmet, sickle cover, hand glove. Wellington boots																			
2	Sprayers	Respirator, nitrile glove goggles, wellington boots, apron.																			
3	Fertilizer applicator	Apron, wellington boots, dust mask, nitrile glove.																			
4	Mill operator	Safety boots, ear muff, safety vest, helmet, cotton glove																			
5	WTP operator	Safety boots, muff, safety vest, helmet, cotton glove, dust mask																			
	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	Saremas 2 CU provides medical care to Group Estate workers/mill with Klinik Ladang established within the premises. In addition, all workers are covered by SOCSO, Medical care and accident insurance is provided to all employees, both Local and Foreign workers under Employees' Social Security Act 1969 (Act 4). Sighted payment made to SOCSO on Form 8A for foreign and local workers at the POM and estates was available for reviewed.																		
	6.7.5 Occupational injuries are recorded	YES	Form JKPP 8 for 2021 at Saremas 2 CU was submitted to DOSH timely on 20/01/2022 via																		

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	using Lost Time Accident (LTA) metrics.		MyKKP System. Accident statistics were being maintained in a satisfactory manner and periodically reviewed. Total hours work for 2021 is 5553600.00 hour and total lost day work is 121 days. There are 2 accidents more than 4 days MC were reported for the estates. 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	Saremas 2 CU continued to implement Integrated Pest Management (IPM) in the estates and continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the EMU which include monitoring pest population, cultural , biological, physical , mechanical control and pesticides usage. In order to minimize use of pesticides, the estates had planted beneficial plants mainly <i>Tunera subulata</i> , <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> with maps indicating areas planted. The estates also practised Pheromone traps in immature areas as a prevention for Rhinoceros Beetles infestation. In the 3 estates, census was carried out on rat damage and diseases such as Ganoderma. The IPM technique to control rats includes rearing barn owls (<i>Tyto alba</i>) and rat baiting was by spot baiting. Rat baiting would continue until bait acceptance fell below 20%. The procedure referred was in the Agricultural Manual and Standard Operating Procedure for Oil Palm.
	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	There was no evidence that species referenced in the Global Invasive Species Database and CABI.org are to be used in managed areas, as per site visited and as per the stakeholder consultation with relevant workers.
	7.1.3 There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	YES	Wilmar Internal Limited had a policy of no open burning. As advocated, both estates practised Zero burning thus no use of fire for pest control. In the 2021 replants visited during the audit in both estates, it was evident that all palms were felled, shredded, windrowed and left to decompose.
7.2	7.2.1 (C) Justification of all pesticides used	YES	Justification of all pesticides used had been demonstrated. The use of selective products

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.	is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.		that are specific to the target pest, weed or disease had been demonstrated in: i. SOP Manual – page 1-6 Justification in SOPs on the use of Agrochemicals ii. Agriculture Manual – Chapter 6 -upkeep and maintenance of oil palm. iii. Agriculture Manual - Chapter 8: Plant Protection-Pest and Disease Management
	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	Saremas 2 CU had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients applied per ha. Pesticides are used only when justified and areas used were recorded in bin cards, program sheets, chemical register, field cost books and in progress reports. All estates had documented programs for spraying pesticides and for rat baiting. Records of pesticides used were available for verification.
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	YES	As part of the IPM plans, the quantity of pesticides required for various field conditions are documented and justified in Wilmar International Limited's Agriculture Manual and Standard Operating Procedure for Oil. The implementation in the field were consistent with the following practices and were adopted by the estates; a) Established growth of beneficial plants (<i>Cassia cobanensis</i> , <i>Antigonon leptopus</i> and <i>Tunera subulata</i>) to attract natural predators and reduce use of insecticides. During the site visit the auditor observed notable quantity of beneficial plants been planted. b) The estates in order to reduce the use of pesticides to control rats, the use of Barn Owls (<i>Tyto alba</i>) was currently under trial. The Saremas 2 CU as per the IPM plan continued to manage pests, other than weeds, at below threshold levels. No prophylactic spraying had been carried on all 3 units. The units, in order to minimise pesticide usage, do not carry out calendar baiting of rats. Rat baiting was carried out as and when required and only in areas where census showed damage above threshold level. Furthermore, in order to minimise the use of weedicide only spraying of circle and paths had been carried. Spraying is only carried as per program. Weeds in the inter rows are mainly slashed with minimum spraying.
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	YES	There was no evidence of prophylactic use of pesticides in Saremas 2 CU except in immature and young fields, where prophylactic spraying using diluted cypermethrin are still practised for the Pest and Diseases. Saremas 2 CU only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations 2000. From the review of the chemical register, it was noted that all pesticides used except for Amine and Cypermethin which were Class II chemicals, all others were of Class III & IV. The use of paraquat had been banned in all estates since 06/04/2007.
	7.2.5 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or	YES	Saremas 2 CU only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations 2000. From the review of the chemical register, it was noted that all pesticides used except for Amine and Cypermethin which were Class II chemicals, all others were of

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	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:		Class III & IV. The use of paraquat had been banned in all estates since 06/04/2007. There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions had been used. From records and interviews with workers, staff and estate assistants, found that they were trained, all precautions taken, and all legal requirements met. Signboards indicated 'AWAS Dilarang Masuk', block, dates of operation, type of operation and chemical used.
	7.2.5a Judgment of the threat and verify why this is a major threat.	YES	As mentioned in 7.2.5. of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. Hence, the need for a judgment of the threat assessment does not apply on the Saremas 2 CU.
	7.2.5b Why there is no other alternative which can be used.	YES	As above.
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	YES	As above.
	7.2.5d What is the process to limit the negative impacts of the application.	YES	As above.
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	YES	As mentioned in 7.2.5. of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. Hence, the need for an estimation of the timescale of the application and steps taken to limit application to the specific outbreak does not apply on the Saremas 2 CU
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	YES	Saremas 2 CU continued to train their employees in handling pesticide and the knowledge and skill required to cover safe handling practices and standard operating procedures. Records of training were available for verification. The training included the safety aspects and usage of PPE when handling with pesticides and herbicides. Record of training was available for verification.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	YES	The storage of pesticides at Saremas 2 CU was found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149) and Regulations. The chemical and fertiliser stores (with cemented floors and roofing) are locked & handled only by authorized personnel i.e. storekeeper. The stores in

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
			estate and mill were ventilated (equipped with exhaust fans). All the chemicals were arranged/segregated according to the type.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	YES	Empty pesticides containers were triple rinsed, holes punched and stored separately in the SW store. Thereafter disposal arrangement will follow accordingly as per procedure SSOP Scheduled waste. Presently all SW are dispatched to DOE approval contractor. No containers being used for other purpose in the estates/mill with the exception that some empty chemical containers were recycled for premixing pesticides for onward delivery to field. Empty pesticide containers were stored before being disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. Inventory and consignment documents verified for confirmation of proper mgmt. and disposal. On some estates the empty pesticide containers were triple rinsed, holes punched and stored, while on some they were directly store in the schedule waste stores. Records showed that the empty pesticide containers were disposed to a DOE licensed contractor named.
	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 is not a practice in Saremas 2 CU. There was no evidence to show that such a method being used in Saremas 2, Segarmas and Kaminsky Estates. This was also supported through interviews with executives, field staffs and workers. No such activities being witnessed during the site/field visit.
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	YES	The organization had conducted annual medical surveillance for pesticides operators exposed to Organophosphate in Oct 2021. All operators were fit to work.
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	YES	All 3 Estates continued to comply with <i>Penyemburan Racun</i> where no work with pesticides was given to pregnant or breast-feeding women. List of sprayers were maintained by all 3 estates 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	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous	YES	The Estates and Mill had established the waste and pollution management plan 2021/22 as shown below. The PIC and time frame was also shown in the management plan. The most significant environmental receptors for the estates and mill operations were:

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
disposed of in an environmentally and socially responsible manner.	characteristics, is documented and implemented.		<ul style="list-style-type: none"> Air – sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping – biogas emission) – GHG. Water – cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blowdown. Land – scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste. <p>Sighted the 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 2022. The waste management plan has also identified source of pollution, possible waste/pollution, effected environment, prevention, mitigation and enhancement.</p>
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	YES	Standard Operating Procedure Scheduled Waste Disposal has been established. The documentation and identification of all waste product such as scheduled wastes, domestic wastes, clinical wastes, recyclable wastes such as metal, tins, plastics, bottles, mill wastes and polluting material e.g. EFB and POME. Scheduled wastes identified included hydraulic oil (SW305), spent lubricant oil (SW306), used chemical containers/drums (SW409), used filter (SW410), laboratory (SW430), used batteries (SW102), and clinical wastes (SW 403). Disposal of empty pesticide containers were carried out as per established procedures. Triple rinsing procedures was continually implemented for empty pesticide containers. The rinsed containers were then pierced and stored prior disposal.
	7.3.3 The unit of certification does not use open fire for waste disposal.	YES	During site visit at all units of certification, there was no evidence of open fire has been used for waste disposal. Site visits at replanting areas. all the palms have been chipped and left for decomposed. All domestic wastes (household and food waste only) at Saremas 2 CU 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 2 CU continued to maintain and improve soil fertility to a level that ensures optimal and sustained yield by monitoring the fertilizer inputs through annual fertilizer recommendations as per the SOPs, Wilmar International Limited's Agriculture Manual & Standard Operating Procedure for Oil Palm. Saremas 2 CU also practised the maintenance of long-term soil fertility by annual application of fertilizers based on periodic foliar and soil analysis, biomass retention (pruned fronds left to decompose in the fields) and EFB, water management and maintaining soft weeds, <i>Nephrolepis biserrata</i> within interlines. Fertilizer application, which was of paramount importance for maintenance of soil fertility, was carried out based on the recommendations made by Eco Management Unit (EMU) and Wilmar International Limited's Agriculture Manual & Standard Operating Procedure for Oil Palm.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage	YES	Saremas 2 CU continued to monitor their fertilizer inputs as recommended by Eco Management Unit (EMU) who visited the estates during the annual foliar sampling carried

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings																																																									
	changes in soil fertility and plant health.		out in Apr 2021. All analysis done by third-party. The soil analysis provided the indication of soil health and monitor the changes in the organic carbon and total nitrogen. Soil sampling were carried out on a 6 year cycle basis and were last carried out on 2018.																																																									
	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 2 CU had a nutrient recycling strategy in place. Palm fronds were stacked in the interrow to decompose. For EFB application on the estates, priority was given for application in young mature areas and replants. The EFB will help to supplement the inorganic fertilizer thus improving the nutrient status. There was no POME application in all 3 Estates. POME was used for Methane capture at the POM.																																																									
	7.4.4 Records of fertiliser inputs are maintained.	YES	Saremas 2 CU continued to maintain the records of the fertiliser inputs in the Monthly Fertiliser Returns 2021. Fertiliser Application Monitoring for 2022 programme were in progress. The main fertilizers recommended for Mature Oil Palms for 2021 were Urea, Muriate Of Potash, Kieserite, Kieserbor, NK 1 and NPK Granular. For Immature Oil Palms the fertilizers recommended were Ammonium Sulphate (SOA), Muriate Of Potash, Kieserite, Kieserbor and Rock Phosphate, NPK Yellow, and NPK Blue.																																																									
7.5 Practices minimise and control erosion and degradation of soils.	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	YES	<div>Based on the soil maps, the soil series were:<table><tr><td>Saremas 2 Estate</td><td>Segarmas Estate</td><td>Kaminsky Estate</td></tr><tr><td>Bedup</td><td>Bedup</td><td>Bedup</td></tr><tr><td>Bekenu</td><td>Bekenu</td><td>Bekenu</td></tr><tr><td>Derawan</td><td>Derawan</td><td>Derawan</td></tr><tr><td>Kapit</td><td>Kerayong</td><td>Gong Chenak</td></tr><tr><td>Kekura</td><td>Kuah</td><td>Kapilit</td></tr><tr><td>Nyalau</td><td>Nyalau</td><td>Kapit</td></tr><tr><td>Semerak</td><td>Semerak</td><td>Kechor</td></tr><tr><td></td><td>Rasau</td><td>Kekura</td></tr><tr><td></td><td>Tebok</td><td>Kerayong</td></tr><tr><td></td><td></td><td>Kuah</td></tr><tr><td></td><td></td><td>Lunas</td></tr><tr><td></td><td></td><td>Licu / Erong</td></tr><tr><td></td><td></td><td>Musang</td></tr><tr><td></td><td></td><td>Nyalau</td></tr><tr><td></td><td></td><td>Rasau</td></tr><tr><td></td><td></td><td>Semerak</td></tr><tr><td></td><td></td><td>SogomanaSteepland</td></tr><tr><td></td><td></td><td>Tebok</td></tr></table></div> <div>There were no fragile/marginal soils in Saremas 2 Esate and Segarmas Estate. On Kaminsky there was 32.59 Ha of peat soils. All the 3 Estates also had slope classification maps which showed slopes of varying degrees such as 0-6° - flat-Undulating, 6 °-12 ° - Undulating-rolling, 12 °-18 ° - hilly, 18 °-25 ° - steep and >25 ° - Very Steep. The slope</div>	Saremas 2 Estate	Segarmas Estate	Kaminsky Estate	Bedup	Bedup	Bedup	Bekenu	Bekenu	Bekenu	Derawan	Derawan	Derawan	Kapit	Kerayong	Gong Chenak	Kekura	Kuah	Kapilit	Nyalau	Nyalau	Kapit	Semerak	Semerak	Kechor		Rasau	Kekura		Tebok	Kerayong			Kuah			Lunas			Licu / Erong			Musang			Nyalau			Rasau			Semerak			SogomanaSteepland			Tebok
Saremas 2 Estate	Segarmas Estate	Kaminsky Estate																																																										
Bedup	Bedup	Bedup																																																										
Bekenu	Bekenu	Bekenu																																																										
Derawan	Derawan	Derawan																																																										
Kapit	Kerayong	Gong Chenak																																																										
Kekura	Kuah	Kapilit																																																										
Nyalau	Nyalau	Kapit																																																										
Semerak	Semerak	Kechor																																																										
	Rasau	Kekura																																																										
	Tebok	Kerayong																																																										
		Kuah																																																										
		Lunas																																																										
		Licu / Erong																																																										
		Musang																																																										
		Nyalau																																																										
		Rasau																																																										
		Semerak																																																										
		SogomanaSteepland																																																										
		Tebok																																																										

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings																												
			<p>classification as per the topography maps were as follows</p> <table border="1"> <thead> <tr> <th>Slope</th><th>Saremas 2 in %</th><th>Segarmas in %</th><th>Kaminsky in %</th></tr> </thead> <tbody> <tr> <td>0 - 6°</td><td>63.51</td><td>55.45</td><td>69.25</td></tr> <tr> <td>6° - 12°</td><td>15.57</td><td>31.07</td><td>17.81</td></tr> <tr> <td>12° - 18°</td><td>10.63</td><td>07.09</td><td>8.84</td></tr> <tr> <td>18° - 25°</td><td>06.98</td><td>03.46</td><td>3.76</td></tr> <tr> <td>>25°</td><td>03.31</td><td>02.93</td><td>0.34</td></tr> <tr> <td></td><td>100.00</td><td>100.00</td><td>100</td></tr> </tbody> </table>	Slope	Saremas 2 in %	Segarmas in %	Kaminsky in %	0 - 6°	63.51	55.45	69.25	6° - 12°	15.57	31.07	17.81	12° - 18°	10.63	07.09	8.84	18° - 25°	06.98	03.46	3.76	>25°	03.31	02.93	0.34		100.00	100.00	100
Slope	Saremas 2 in %	Segarmas in %	Kaminsky in %																												
0 - 6°	63.51	55.45	69.25																												
6° - 12°	15.57	31.07	17.81																												
12° - 18°	10.63	07.09	8.84																												
18° - 25°	06.98	03.46	3.76																												
>25°	03.31	02.93	0.34																												
	100.00	100.00	100																												
	7.5.2 No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	YES	<p>Saremas 2 CU had a management strategy for planting on slopes to minimise and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by:</p> <p>a) Wilmar International Limited 2011 Agriculture Manual & Standard Operating Procedure For Oil Palm in Chapter 3: Land Clearing and preparation, Part 1: Undulating to steep land.</p> <p>b) It was incorporated with the company policy as a management strategy for plantings on slopes between 9 and 25 degrees.</p> <p>It was observed that no replanting of any individual, contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the CU.</p>																												
	7.5.3 There is no new planting of oil palm on steep terrain.	YES	The 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 2 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	As per all PPB Estates, to demonstrate the long-term suitability of land for palm oil cultivation, Saremas 2 CU have conducted soil surveys identifying marginal and fragile soils, and terrain surveys including steep terrain. As mentioned under indicator 7.5.1 soil maps by third party, and slope classification maps were made available.																												
	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	YES	Extensive planting on marginal and fragile soils, was avoided by the Saremas 2 CU. There were no fragile/marginal soils in Saremas 2 and Segarmas Estate. However in Kaminsky Estate, there was a small area planted on peat soils.																												
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	YES	Saremas 2 CU had a management strategy for palm oil cultivation taking into account the soil surveys and topographic information, in planning of drainage and irrigation systems, roads and other infrastructure.																												
7.7 No new planting on peat, regardless of	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development	YES	The 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 on peat or new development of areas at																												

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
depth after 15 November 2018 and all peatlands are managed responsibly.	areas.		Saremas 2 CU.
	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).	YES	The auditor found out that the areas of peat within the managed areas are inventoried, documented and reported to RSPO Secretariat by the Senior Manager Sustainability in Nov 2019 with the replied from RSPO Secretariat in Mar 2020 that there were no uncertified sites with peat in Wilmar Malaysia.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	YES	Saremas 2 CU i.e. Kaminsky Estate which has 32.59 Ha of Peat Soils continued to monitor its subsidence. During the site visit, it was evident that the subsidence pole, piezometer and water level marker were found in order.
	7.7.4 (C) A documented water and ground cover management programme is in place.	YES	Saremas 2 CU i.e. Kaminsky Estate which has 32.59 Ha of Peat Soils have a documented water and ground cover management programme in place in the Wilmar Best Practices and Standard Operating Procedure for Management of Existing Oil Palm Cultivation on Peat. Kaminsky Estate also maintaining water table to Clay Soil underneath Peat layer with a drop of 8 cm from 437cm to 429 cm and water table to ground surface with an average of 28.91 cm per month using the Piezometer reading.
	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. This is subject to transitional (5 years: 2019	YES	As per RSPO guidance, Drainability Assessment is not required in Malaysia for replanting on contiguous areas of peat less than 40 hectares. As the peat area in Kaminsky Estate is only 32.59 Ha, therefore this indicator is not applicable.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.		
	7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	YES	The Saremas 2 CU had a small area (32.59 Ha) of peat soils in Kaminsky Estate. The area was managed through Wilmar Best Practices and Standard Operating Procedure for Management of Existing Oil Palm Cultivation on Peat Soils SOP. At site, 1 Subsidence Pole, 1 Piezometer, 1 Water Level markers were being used to manage the area. In the drains, water level was controlled using sand bag bunds. For additional guidance, the Kaminsky Estate also used the RSPO Manual on Best Management Practices (BMPs) for existing Oil Palm Cultivation on Peat', version 2 (2018).
	7.7.7 (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.	YES	There were no unplanted and set-aside peatlands in the managed area in Saremas 2 CU i.e. Kaminsky Estate.
7.8 Practices maintain the quality and availability of surface and groundwater.	7.8.1 A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:	YES	<p>Water management plan established since January 2015, and has been reviewed and updated annually, latest reviewed in Jan 2022. The plan covered</p> <ul style="list-style-type: none"> • Water resources • Housing Water • Emergency Management • Drought Contingency Plan <p>Among of action plan has been implemented were:</p> <ul style="list-style-type: none"> -all water tank and rain gutter shall be clean periodically -water treatment plant settling tank & sand filter to be back wash daily -main storage water tank to be clean up periodically.' -to make sure WTP in working condition and dosing are correctly done. -to create awareness among of employees.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
			-to create awareness among of employee to boil the water before consumption
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	YES	In order to ensure that estates did not contribute to pollution of water used by community's river water sampling was carried out 4 times a year. Results of analysis were verified from the Environmental Monitoring Report by third-party.
	7.8.1b Workers have adequate access to clean water.	YES	As verified at Saremas 2 CU facilities for workers and through interview with workers, all workers have obtained adequate access to treated clean water. Cleanliness of drinking water supplied to worker was ensured by carrying water analysis. Drinking water quality has been monitored by a third-party lab. Results from analysis were showed all the parameters within the limits. Results were according with maximum permissible chemicals level for drinking water recommended by WHO 2017.
	7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).	YES	During site inspection, water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).
	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	<u>EQ (Prescribed Premise) Crude Palm Oil Regulations 1977</u> <ul style="list-style-type: none"> ▪ License valid until June 2022. The license indicated that the mill has a capacity of 45mt/hr ▪ Treated effluent is allowed to be discharge as water course – Sg. Suai. ▪ Analysis of the final discharge was carried out on monthly basis by ESI Laboratory Sdn Bhd, latest in Mar 2022. Review of the results indicated that all parameters were within the regulatory limit.
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	YES	Mill water used per tonne FFB was monitored by daily basis and has been accordingly.
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	There is no opportunity for the estates to capitalize the utilisation of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation. A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the Environmental Aspect and Impact activities report for 2022 identified in the following: <ul style="list-style-type: none"> i) Environmental Aspect Identification FY 2022 reviewed accordingly. ii) Waste management plan, pollution prevention plan 2022 The plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented. Record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings																																																														
			improvement. Among the plan for improving fossil fuel are: <ul style="list-style-type: none">Closely monitored operation of tractorsMinimise the electricity usage at workers housingReplace light bulb with energy saving bulbTo switch off and unplug all the electrical equipment after usedMinimise the lubricant oil usage through using small tractor for FFB evacuation																																																														
7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.	7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.	YES	<p>GHG emission has been identified and assessed to all estates and mill through list of waste, EIA, pollution prevention plan, etc. for year 2021/22. CU calculated the emission through RSPO Palm GHG (data as table below). CU also submitted GHG footprint report to the RSPO and RSPO annual communication of progress (ACOP) (publicly available report) -:</p> <p><u>Summary of Net GHG Emissions</u></p> <table><tr><td>Emissions per Product</td><td>tCO2e/tProduct</td><td>Extraction</td><td>%</td></tr><tr><td>CPO</td><td>1.08</td><td>OER</td><td>21.86</td></tr><tr><td>PK</td><td>1.08</td><td>KER</td><td>3.75</td></tr></table> <table><tr><td>Land Use</td><td>Ha</td></tr><tr><td>OP planted on mineral soil</td><td>20266</td></tr><tr><td>OP planted on peat</td><td>58.20</td></tr><tr><td>Conservation (forested)</td><td>1405.37</td></tr><tr><td>Conservation (non-forested)</td><td>299.29</td></tr></table> <p><u>Summary of Field Emissions and Sinks</u></p> <table><tr><td></td><td colspan="2">Own Crop</td><td colspan="2">Group</td></tr><tr><td></td><td>tCO2e</td><td>tCO2e/tFFB</td><td>tCO2e</td><td>tCO2e/tFFB</td></tr><tr><td>Emissions</td><td></td><td></td><td></td><td></td></tr><tr><td>Land Conversion</td><td>104224.87</td><td>1.04</td><td>1041.98</td><td>0.47</td></tr><tr><td>*CO2 Emissions from Fertiliser</td><td>4565.71</td><td>0.05</td><td>55.33</td><td>0.01</td></tr><tr><td>**N2O Emissions - fertilizer</td><td>2953.94</td><td>0.03</td><td>38.66</td><td>0.02</td></tr><tr><td>Fuel Consumption</td><td>2206.78</td><td>0.02</td><td>28.33</td><td>0.01</td></tr><tr><td>Peat Oxidation</td><td>1764.88</td><td>0.02</td><td>19.04</td><td>0.01</td></tr></table>	Emissions per Product	tCO2e/tProduct	Extraction	%	CPO	1.08	OER	21.86	PK	1.08	KER	3.75	Land Use	Ha	OP planted on mineral soil	20266	OP planted on peat	58.20	Conservation (forested)	1405.37	Conservation (non-forested)	299.29		Own Crop		Group			tCO2e	tCO2e/tFFB	tCO2e	tCO2e/tFFB	Emissions					Land Conversion	104224.87	1.04	1041.98	0.47	*CO2 Emissions from Fertiliser	4565.71	0.05	55.33	0.01	**N2O Emissions - fertilizer	2953.94	0.03	38.66	0.02	Fuel Consumption	2206.78	0.02	28.33	0.01	Peat Oxidation	1764.88	0.02	19.04	0.01
Emissions per Product	tCO2e/tProduct	Extraction	%																																																														
CPO	1.08	OER	21.86																																																														
PK	1.08	KER	3.75																																																														
Land Use	Ha																																																																
OP planted on mineral soil	20266																																																																
OP planted on peat	58.20																																																																
Conservation (forested)	1405.37																																																																
Conservation (non-forested)	299.29																																																																
	Own Crop		Group																																																														
	tCO2e	tCO2e/tFFB	tCO2e	tCO2e/tFFB																																																													
Emissions																																																																	
Land Conversion	104224.87	1.04	1041.98	0.47																																																													
*CO2 Emissions from Fertiliser	4565.71	0.05	55.33	0.01																																																													
**N2O Emissions - fertilizer	2953.94	0.03	38.66	0.02																																																													
Fuel Consumption	2206.78	0.02	28.33	0.01																																																													
Peat Oxidation	1764.88	0.02	19.04	0.01																																																													

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings					
			Sinks					
			Crop Sequestration	-80875.35	-0.81	-987.66	-0.45	
			Conservation Sequestration	-10992.10	-0.11	-12.86	-0.01	
			Total	24090.7	0.24	185.44	0.08	
			Summary of Mill Emissions and Credits					
				tCO2e	tCo2e/tFFB			
			Emissions					
			POME	3701	0.04			
			Fuel Consumption	355.42	0			
			Grid Electricity Utilisation	0	0			
Credits								
Export of Grid Electricity	0	0						
Sales of PKS	0	0						
Sales of EFB	0	0						
Total	4056.41	0.04						
	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 2 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	Saremas 2 CU had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation. The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adverse impact the environment., Fuel Consumption, Peat Oxidation, POME and reported in the PalmGHG Summary Report.					
7.11 Fire is not used for preparing land and is	7.11.1 (C) Land for new planting or replanting is not prepared by burning.	YES	There was no evidence to show that fire had been used for preparing land for replanting. In the 2019 replants visited during the audit in the estates, it was evident that all palms were felled, shredded, windrowed, and left to decompose.					

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
prevented in the managed area.	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	YES	Saremas 2 CU had established fire prevention and control measures for the areas under its direct management. In the mill their water hydrant and valid fire extinguishers at the various operating stations. All 3 estates had valid fire extinguishers at the office, employee quarters, chemical & fertiliser stores, diesel skid tank, etc.
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	YES	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 SOU also engaged with adjacent to stakeholder on fire prevention and control measures by inviting them to join training. Stakeholders meeting (Community Base Development Committee) had been conducted for all estates and from meeting minutes sighted one of the agenda on the briefing on the fire emergency on fire situation. Meeting conducted in Jan 2022.
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.	7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	YES	Auditors has verified through checking through www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Saremas 2 CU since Nov 2005.
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	YES	The CU has conducted the HCV assessment in July 2008. The assessment had covered all the HCV on RTEs species within the residual forested areas of the estates. The identified HCV areas included the steep logged over hill dipterocarp forest of Bukit Durang Conservation Area (HCV4). For Audit in 2022, Sighted the CU has conducted "Scoping Study of the Proposed Conservation Areas Plantations in Wilmar Sarawak, Malaysia". A field survey primarily focused on assessing the general ecology of the proposed conservation values that are present or potentially present, potential intact forest with high carbon stock and the treats to the areas that might occur dated February 2019. Total area of HCV identified at Saremas 2 CU is 1,379.71 Ha.
	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	Based on the Scoping Study of the Proposed Conservation Areas Plantations in Wilmar

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	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>Sarawak, Malaysia. RTEs are present within the Saremas 2 Certification Unit. Measures taken to maintain and/or enhance the RTEs are contained in the action plan. Sighted during the audit were HCV Monitoring & Action Plan 2021 – 2025 for Kaminsky, Segarmas and Saremas 2 estates. Among the action plans identified include:</p> <ul style="list-style-type: none"> ▪ Coding map for HCV monitoring. The map sighted and was presently used for HCV monitoring. ▪ Reassessment of all areas carried out in August 2018, and the full report was done on February 2019. And recommendation has been followed by the management. ▪ Continuous HCV monitoring. This was being done on a monthly basis. Monthly monitoring reports for Saremas 2 Estate, Segarmas and Kaminsky were sighted during the audit. ▪ Awareness training for all workers and staff. This has been carried out and programmes to continuously educate their employees on RTE species are in place. ▪ Periodic spot checks conducted at linesite. ▪ Socialization to stakeholders including local villagers on prohibited activities such as encroachment, illegal logging, and awareness talk given on RTE species. This was confirmed by the local communities and protected and totally protected species posters were sighted at the longhouse Rumah Rantau. ▪ Getting Honorary Wildlife Rangers (HWR) among the staff who were appointed by the Sarawak Forest Corporation to check, seize and raid illegal flora and fauna from hunters and poachers. Records of refresher training for the HWR held between 25 July to 26 July 2018 was sighted. <p>Additionally, a 3-year Research Collaboration Agreement between the PPB Oil Palms Berhad and UNIMAS was signed on 15 August 2018 to:</p> <ul style="list-style-type: none"> ▪ Collaborate to carry out a biodiversity survey project that aims to identify RTE species within selected plantation areas; ▪ To understand the ecology of selected species of flora and fauna that inhabits these areas; ▪ To understand the factors that sustain and influence their distribution in plantations operated by the Company; ▪ Propose appropriate management and monitoring for the identified species <p>Sighted there is a consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations on date 25 May 2021, Saremas 2 Management has invited The Government Agencies, NGO's, Surrounding Stakeholder affected to share the idea regarding the Saremas 2 HCV Plan, and sighted the result of this communication has been updated to their Plan.</p>
	7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland	YES	Auditors has verified through checking through www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Saremas 2 CU since Nov 2005.

RSPO PUBLIC SUMMARY REPORT

Clause	Indicators	Comply Yes/No	Findings
	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.		
	7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	YES	Programmes to continuously educate their employees on RTE species were in place. In accordance with the company rules, appropriate disciplinary measures will be taken against any employees found capturing, harming, collecting or killing these species. 'HCV Yearly Work Plan Summary 2022 for Saremas 2 CU, including POM 2 was made available during the audit. Training for all workers were carried out. The objectives of the training include understanding what was HCV, riparian areas, prohibited activities. The trainings conducted covered awareness of environment, understand HCV & riparian and prohibited and illegal activities, creating awareness on protected wildlife & fauna and safety measures when encountering wildlife.
	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	Saremas 2 CU continues to discourage any illegal or inappropriate hunting, fishing or collecting activities. Evidence was seen during the site review that signage to prohibit hunting, fishing and pesticide spraying not allowed within buffer area at the HCV Area. It was noted that AP has been monitoring surrounding the estate to control everything including any illegal activities.
	7.12.8 (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.	YES	Auditors has verified through checking through www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing at Saremas 2 CU since Nov 2005. Remediation and Compensation Procedure (RaCP) did not apply.

RSPO PUBLIC SUMMARY REPORT

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

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

RSPO PUBLIC SUMMARY REPORT

		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.		
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 requirement. There was no new planting within the properties in WIL. The Assessment of compliance to RSPO Partial Certification Requirements has been carried out for clause 5.5.3 (e)-(h) of certification system for units such as:</p> <p><u>Indonesia Units</u></p> <ul style="list-style-type: none"> - Pt. Agrindo Indah Perkasa on June 2018 - Ksu Mutiara Bosa Sikilang on June 2018 - Kud Damai Sejahtera on June 2018 - Kud Kapar on June 2018 - Koperasi Karya Makmur Pahirangan on February 2019 - Koperasi Mamur Sejahtera on January 2019 - Kud Permata Sawit Maligi on June 2018 - Kud Rantau Pasaman Sasak on June 2018 - Pt. Buluh Cawang Plantation on June 2018 - Pt. Daya Landak Plantation on June 2018 - Pt. Indoresin Putra Mandiri on June 2018 - Pt. Putra Indotropical on June 2018 - Pt. Pratama Prosentindo on June 2018 - Pt. Agronusa Investama – PAHAUMAN on June 2018 - Pt. Sarana Titian Permata Pom 2 on January 2019 - Koperasi Tuah Jubata on February 2019 <p><u>Africa Units</u></p> <ul style="list-style-type: none"> - Biase Plantation Limited (BPL) on February 2019 - Eyop Industries Limited (EIL) on february 2019 <p><u>Malaysia Units</u></p> <ul style="list-style-type: none"> - Jebawang Sdn Bhd – Laba Utama on April 2019 - Suburmas Plantation Sdn Bhd on 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>

RSPO PUBLIC SUMMARY REPORT

	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8;	Yes	<p>There was no report or issues raised in relation to land conflicts except for the :</p> <p>Since 2014, land claim was made by a group of Penans Community of Jambatan Suai. Two groups from the same origin of Kampung Ugos and Kampung Long Suva'ak, and Kampung Mareng and Kampung Penan Muslim claimed over 62,687 ha of land. The areas involved 22,129 ha overlapping with Saremas 1 & 2, Segarmas Estate, Suai Estate and Kaminsky Estate.</p> <p>Saremas Sdn Bhd denies the Penans' claim and states that the company was the registered proprietor of Lot 8, Block 24, delineated on Survey Plan No G17-1-3 (4.1) & MP 4/48-13, and registered at the Miri Land Registry Office on 9 July 2013. The land title will expire on 6 May 2043. The mentioned Land Title was sighted and verified during audit.</p> <p>After several meetings held to discuss an amicable solution, the claimant commenced legal action by filing a writ of summons dated 5 September 2016 at the Miri High Court against Saremas Sdn Bhd and 7 others. Amended Defence filed on 26 January 2017. The case came up for mention at the Miri High Court on 4 April 2017 when another mention date fixed for 25 April 2017 as the Plaintiffs are still waiting for some documents from the State Attorney General's Chambers.</p> <p>Based on the above, and on records available, there was evidence to show that there is proof of legal acquisition of land title by Saremas Sdn Bhd, and fair compensation were in progress to the groups of Penans following negotiations and consultations, which was in line with RSPO guidelines and PPB Oils Palms (Wilmar) procedures.</p> <p>During Surveillance audit (2016), Letter of Demand (LOD) from the Harrison Ngau & Co Advocates and Solicitors dated 30 April 2015 to vacate the said land, failing which they will proceed with legal proceeding. Saremas 2 CU had appointed a legal firm (Loke, King, Goh & Partners) on 18th May 2015 to represent the company. The CU denied the claims.</p> <p>During Surveillance Audit (2017) audit the progress of the land claim were as below; Writ of Summon in the High Court in Sabah and Sarawak, Suit no: MYY-21NCvC-2/9-2016 (HC) dated 5th September 2016 from Messrs Baru Bian Advocates to: -</p>
--	-----	---	-----	---

RSPO PUBLIC SUMMARY REPORT

			<ul style="list-style-type: none"> o Saremas Sdn Bhd o Tanjung Tiara Sdn Bhd o Kaminsky Sdn Bhd o Gayanis Sdn Bhd o Segarmas Plantation Sdn Bhd o Bintulu Lumber Development Sdn Bhd o Superintendent of Land & Survey, Miri Division o State Government of Sarawak <p>The CU's legal firm send a Memorandum of Appearance on 28th September 2016 and Statement of Defence on 24th October 2016. Reply of defence and Notice to Produce Document from plaintiff dated 22nd February 2017. The Loke, King, Goh & Partners Advocates send a notification of date for further management of the case (letter dated 6th March 2017). Currently the plaintiff is waiting for interrogatories process by State Attorney General Chambers.</p> <p>During Surveillance Audit (2018), the progress of the land claim by the Penan & Iban communities against Wilmar were as below;</p> <ol style="list-style-type: none"> 1. The Penan Community: - <ol style="list-style-type: none"> a) Further to earlier suit (as in audit 2017), in Sept 2017 the Penan (plaintiffs) decided to withdraw the suit against Wilmar but with liberty to file afresh (right to file a claim again later). b) Wilmar opposed the condition of "liberty to file afresh" and won the case in high court in Nov. 2017. c) The Penan (plaintiffs) is appealing against the high court decision at the Court of Appeal and waiting for hearing date. 2. The Iban Community :- <ul style="list-style-type: none"> - Still at status quo since last audit in 2017. <p>In December 2017, further to appeal by Sarawak govt., Federal Court rules no NCR over 'pemakai menoa', 'pulau galau' which greatly affect the plaintiff decision to proceed with case.</p> <p>It has been observed during the audit, the Court of Appeal had decided on 18 October 2018 (Civil Appeal No.Q-01(IM)(NCvC)-11-01/2018) that the previous Court case filed on 5 September 2016 by Penan of Kg Jambatan Suai at the Miri High Court against Saremas Sdn Bhd and 7 others (Suit No: MYY-21NCvC-2/9-2016) be withdrawn with no liberty to file afresh. This means that the Plaintiff is prohibited from commencing a fresh legal action against the Defendants on the same matter again. The withdrawal of the suit was made pursuant to an earlier Federal Court decision which held that the Plaintiff's claim for pulau galau and pemakai menoa had failed.</p>
--	--	--	---

RSPO PUBLIC SUMMARY REPORT

			<p>Saremas Sdn Bhd is the registered proprietor of Lot 8, Block 24, delineated on Survey Plan No G17-1-3 (4.1) & MP 4/48-13, and registered at the Miri Land Registry Office on 9 July 2013 which will expire on 6 May 2043. The said Land Title was sighted and verified during the audit.</p> <p>The Plaintiff had been compensated as proven in Sarawak Gazette No.1256 dated 30 April 1997 which declared 4 parcels of land, namely Lots 58, 59, 60 and 61 as Native Communal Reserve for exclusive use of the Penan Community of Jambatan Suai, Niah, Miri Division.</p> <p>During this Assessment in 2022, It has been observed during the audit, there are no new meeting and claim, the Penan Community accepted the decision made by the court. Auditor already interviewed with their representative Harrison Ngau of Harrison Ngau & Co, Miri (Penan group's legal representative) and SADIA. As of todate no new claim has been made.</p>
(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2;	Yes	There was no report or issues raised in relation to labour disputes. Evidences & document reference such as HCV report results, land title, Racp status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc. were concluded adequate in the report for all uncertified management units.
(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	Yes	Wilmar International Limited (WIL) complied to all the related legal requirement. Evidences & document reference such as HCV report results, land title, Racp status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc. were concluded adequate in the report for all uncertified management units.
(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 5.5.3 (a) – (d) above by the audit team based on self-declarations only by the company,	Yes	<p>Wilmar International Limited (WIL) complied to all the requirement. There was no new planting within the properties in WIL. The Assessment of compliance to RSPO Partial Certification Requirements has has been carried out for clause 5.5.3 (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

RSPO PUBLIC SUMMARY REPORT

		with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:		<p>Evidences & document reference such as HCV report results, land title, Rapc status, LUCA status, planting statement, SOP for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, SOP calculating and distributing fair compensation, etc. were concluded adequate in the report for all uncertified management units.</p> <p>There was no non-compliance found for all requirements during this audit.</p>
		<ul style="list-style-type: none"> A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement; 	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	
	(f)	For requirements 5.5.3 (a)-(d) above, the classification of critical and non-critical is as stated in the RSPO P&C. If a non-compliance against a critical indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless it is actively addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be available.	Yes	
	(g)	Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above	Yes	

RSPO PUBLIC SUMMARY REPORT

		may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these Certification Systems.		
<p>5.6.6</p> <p>The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p> <p>The CB shall have a mechanism in place to identify the interested parties and ensure a represented samples size of the interested parties are consulted in each audit.</p> <p>The CB shall keep track which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle.</p>		No additional indicators	Yes	<p>It has been verified that the land titles were for planting either oil palm or agricultural crops for economic value. It has been confirmed that Wilmar International Limited – Saremas 2 Certification Unit has the right to use the land which was legitimately owned by their company.</p> <p>Evidence of legal ownership of the land including history of land tenure was verified during this audit. Each estate was provided with legal use of the land through a Country Lease signed by the Director of Lands and Surveys of Sarawak following the payment of premium. It was also confirmed that there was no history of customary land tenure except for the dispute above refer indicator 4.4.6, recognized Native Customary Right (NCR) land.</p>

RSPO PUBLIC SUMMARY REPORT

ATTACHMENT 4

DETAILS OF NON-CONFORMITIES AND CORRECTIVE ACTIONS TAKEN

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Root Cause & Corrective Action Taken by the CU	Verification Statement by Auditors
3.3.1 MAR 01 2022	MAJOR	<p>Requirement: 3.3.1: Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>Finding: Standard Operating Procedures (SOP) for the unit of certification was not in place for certain part which must in line with current applicable legal requirement.</p> <p>Objective evidence: The unit of certification does not have SOP on recruitment of foreign workers for contractor workers. The SOP also must in line with current applicable legal requirement.</p>	<p>Root cause: The issue: Wilmar Saremas 2 CU doesn't have SOP on recruitment of foreign workers for contractor workers resulted no checking/monitoring on legal compliance for all contractor workers</p> <p>The root cause: Before this no contractor workers have been hired at Saremas 2 CU No monitoring and training have been conduct for contractors workers resulted no SOP on recruitment of local and foreign worker for contractor has been establish. Management of Saremas 2 CU admit the mistake for not established the SOP before hire Contractor.</p> <p>Corrective Action: Correction: Management will revise and produce the SOP on the recruitment of foreign workers for contractor workers</p> <p>Corrective action: 1.The SOP on recruitment of local and foreign worker for contractor has been establish on 5th May 2022 2.The SOP on Contractor monitoring has been revising in line with current applicable legal requirement 3. Training to contractor on the latest SOP on recruitment of local and foreign works for contractor and SOP contractor</p>	<p>Auditor has received and verify the SOP on recruitment of local and foreign worker for contractor namely 'RECRUITMENT OF LOCAL AND FORGIEN WORKERS FOR CONTRACTOR' SOP No PPB/SU/CONT/5/2022 establish on 5th May 2022 and verify the evidence the SOP training and monitoring has been conduct on 10/5/22 and found the evidence acceptable to close the NCR</p> <p>Status : Closed</p>

RSPO PUBLIC SUMMARY REPORT

DA 01 2022			<p>monitoring has been conducted 10th May 2022.</p> <p>4. Email by the Assistant General Manager (AGM) on instruction to all estate on ensuring workers area fully furnished with legal documentation</p> <p>5. Evidence of registration contractor through company AP</p>	
		<p>Requirement: 3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>Finding: The standard operating procedure on "Riparian, floodplain & water bodies management" was not providing explicit directions.</p> <p>Objective evidence: The standard operating procedure on "Riparian, floodplain & water bodies management" dated December 2020 was not providing explicit directions to protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).</p>	<p>Root cause: The issue: The SOP of riparian, floodplain & water bodies management has not been review and revise in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017), resulted current practice was not follow the BMP</p> <p>The root cause: The management admit the mistake that unaware the RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) has already implemented in the RSPO P&C MYNI 2019. Management also Unclear and inadequate information on protection maintaining stream/artificial drainage that flowing to the river.</p> <p>Corrective Action:</p> <p>Correction: To revise the SOP of riparian, floodplain bodies management in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) and will train the new SOP to the staff and workers</p> <p>Corrective action: The SOP of riparian,</p>	<p>Auditor has received and verify the SOP on Buffer zones namely 'PENGURUSAN PENAMPAN SUNGAI RIPARIAN, KAWASAN BANJIR & KAWASAN BADAN AIR (RIPARIAN, FLOODPLAIN & WATER BODIES MANAGEMENT SOP No HCV/RIPARIAN/SOP/001/2020 establish on December 2020 revised on 13/4/2022 and enhance and latest update on 5/5/2022 and verify the evidence the SOP training and monitoring has been conduct on 26/4/22, 23/4/22 (Kaminsky), 14/4/22 (Saremas 2) and Segarmas on 14/4/22 and found the evidence acceptable to close the NCR</p> <p>Status : Closed</p>

RSPO PUBLIC SUMMARY REPORT

			floodplain bodies has been revised in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) on 13/4/2022 and enhance and latest update on 5/5/2022 and has been brief/trained to the staff and workers for Saremas ,Segarmas and Kaminsky	
3.7.1 DA 02 2022	MAJOR	<p>Requirement: 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.</p> <p>Finding: The training related to environmental especially on protected, including maintaining and restoring appropriate riparian and other buffer zones was not appropriately trained to the staff and workers.</p> <p>Objective evidence: The training related to environmental especially on protected, including maintaining and restoring appropriate riparian and other buffer zones was not appropriately trained to the staff and workers. Based on site inspections and interviews workers at Saremas 2, Segarmas and Kaminsky Estate all of the workers interviewed still lack of awareness on BMPs for the management and rehabilitation of riparian reserves.</p>	<p>Root cause: The issue: The SOP of riparian, floodplain& water bodies management has not been review and revise in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017), and training was not conduct properly in line with BMP resulted current practice was not follow the BMP</p> <p>The root cause: The management admit the mistake that unaware the RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) has already implemented in the RSPO P&C MYNI 2019.</p> <p>Management has not conducted to training to the staff and the workers for Kaminsky Estate, Segarmas estate and Saremas 2 Estate using SOP, only conducted training as per normal Buffer zones company practice</p> <p>Corrective Action: Correction: (The correction shall address the objective evidence)</p> <p>1. To conduct training and monitoring on the SOP of riparian, floodplain and waterbodies management to the staff and the worker for Kaminsky estate, Segarmas estate and Saremas 2 Estate,</p>	<p>Auditor has received and verify the SOP on Buffer zones namely 'PENGURUSAN PENAMPAN SUNGAI RIPARIAN, KAWASAN BANJIR & KAWASAN BADAN AIR (RIPARIAN, FLOODPLAIN & WATER BODIES MANAGEMENT SOP No HCV/RIPARIAN/SOP/ 001/2020 establish on December 2020 revised on 13/4/2022 and enhance and latest update on 5/5/2022 and verify the evidence the SOP training and monitoring has been conduct on 26/4/22, 23/4/22 (Kaminsky), 14/4/22 (Saremas 2) and Segarmas on 14/4/22 and found the evidence acceptable to close the NCR</p> <p>Status : Closed</p>

RSPO PUBLIC SUMMARY REPORT

			<p>2. Distributed BMP area has been restored and maintained by Saremas 2 estate, Segarmas Estate and Kaminsky Estate</p> <p>Corrective action: (The corrective action shall address the root cause of this NC)</p> <p>3. The training on the SOP of riparian, floodplain and water bodies management has been conducted to the staff and the workers for Kaminsky Estate, Segarmas Estate and Saremas 2 Estate</p> <p>4. Monitoring records of Training also has been developed to avoid issues in the future.</p>	
--	--	--	--	--

RSPO PUBLIC SUMMARY REPORT

ATTACHMENT 5

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Verification by Assessor
1.1.5 RZ 02 2020	Minor	<p>Finding: Stakeholder list of Saremas 2 CU is incomplete.</p> <p>Objective evidence: Stakeholder lists at Saremas 2 CU are incomplete because:</p> <ul style="list-style-type: none"> a. The lists do not contain nominated representatives for suppliers and government agencies; b. Sarawak Dayak Iban Association (SADIA), the Sarawak NGO representing the local communities from Jambatan Suai in their land claim has not been listed as a stakeholder. 	<p>List of stakeholders for all units within Saremas 2 CU were sighted during the audit. For Saremas 2 estate, the stakeholder list was updated in Jan 2020. It contains list of suppliers, contractors, grocery supplier, government agencies, NGOs including SADIA, the Sarawak NGO representing the local communities from Jambatan Suai in their land claim against Saremas 2 CU, local communities, clinics, neighboring estates and smallholders. Therefore Past Minor NCR RZ 02 2020 has been successfully Closed.</p> <p>Status: Closed</p>
2.1.1 DA 01 2020	Major	<p>Finding: The unit of certification not complies with Environmental Quality (Scheduled Wastes) Regulations 2005, refer to Regulation 10. Labelling of scheduled wastes.</p> <p>Objective evidence: During site visit at Contractor (Lata Sehijau Transport CO.) Workshop (Saremas 2 Estate), sighted no labelling of SW 305.</p>	<p>Auditor has verified the evidence of training report (Scheduled Wastes Management Training). Sighted the training was conducted on 08/01/2022 to Contractor (Lata Sehijau Transport CO.). Besides that, The Contractor workshop has been demolished and all Scheduled waste has been centralized to Saremas 2 Estate store. Therefore Past Minor NCR DA 01 2020 has been successfully Closed.</p> <p>Status: Closed</p>
2.2.2 RAR 01 2020 RZ 06 2020	Minor	<p>Finding: Compliance with applicable legal requirement was not demonstrated by the contractors.</p> <p>Objective evidence: Evidence of all contracted third parties related to insurance covered for foreign and local workers was not at available i.e.:</p> <ul style="list-style-type: none"> Segarmas Estate -Lee Transport – 4 foreign workers & 1 local workers. Kaminsky Estate -Lai Lai Transportation CO – 1 foreign worker 	<p>Medical care and accident insurance is provided to all employees of contractors, both local and foreign workers under Employees' Social Security Act 1969 (Act 4). Sighted last three months' payment (January 2022, February 2022 and March 2022) made to SOCSO on Form 8A and Tokio Marine Insurans (Malaysia) Berhad period of insurance from 01/01/2022 to 31/12/2022 for contractor workers at the all estates was available for reviewed. Thus, previous Minor NCR RAR 01 2020 was agreeable to closed.</p> <p>Status: Closed</p>

RSPO PUBLIC SUMMARY REPORT

		<p>Finding: No legal due diligence was done before engaging P.T. Persada Duta Utama, recruitment agent engaged by Saremas 2 CU.</p> <p>Objective evidence: As admitted by Kusma Dalle, the representative of P.T. Persada Duta Utama, the representatives are in Malaysia on a social visit pass, and has no valid work permit to carry work as a recruitment agent.</p>	<p>Furthermore, regarding previous NCR, Saremas 2 CU could not demonstrate that legal due diligence was done before engaging P.T. Persada Duta Utama, recruitment agent engaged by Saremas 2 CU. As admitted by Kusma Dalle, the representative of P.T. Persada Duta Utama, the representatives are in Malaysia on a social visit pass, and has no valid work permit to carry work as a recruitment agent. As at audit ASA 1 and ASA 2, the representative of P.T. Persada Duta Utama (Kusma Dalle), the contract has been terminated and as at todate, no foreign workers' recruitment has been carried out due to COVID 19 MCO Restriction. Therefore, previous Minor NCR RZ 06 2020 reasonable to closed.</p> <p>Status: Closed</p>
2.2.3 RAR 02 2020	Minor	<p>Finding: Clause disallowing child, forced and trafficked labour and where young worker are employed are protected was not include in the contracts.</p> <p>Objective evidence: During site visit at Saremas 2 Certification Units, sighted that all contract agreement between management and contractor was not include Clause disallowing child, forced and trafficked labour and where young worker are employed are protected.</p>	<p>Sighted During this Audit, in Addendum of Comitment Business Conduct <u>Clause 3 and 4: Labour</u> of the contract included the statement contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts also include a clause for children protection Thus, Past Minor NCR RAR 02 2020 has been successfully closed.</p> <p>Status: Closed</p>
3.1.3 STK 01 2020	Minor	<p>Finding: Internal audit procedure Document No.: PPB/PRO 12/(03)/0212 was not complied with.</p> <p>Objective evidence: On Saremas 2, Sergamas Plantation Sdn Bhd and Kaminsky Sdn Bhd there were no records to show that RSPO P & C MYNI 2019 Internal Audits and management reviews had been conducted.</p>	<p>The management review meeting of Saremas 2 CU which were held on 07/01/2022 were attended by all the manager's estate/mill and sustainability team. It was chaired by Assistant General Manager, Sarawak Operation and attended by 19 other attendees including Group Manager, Senior Managers and Managers. Among the management review discussed were:</p> <ol style="list-style-type: none"> 1. Results of internal audits 2. Customer (internal/external) feedback 3. Process performance and product conformity 4. Status of preventive and corrective actions 5. Follow-up actions from management reviews 6. Changes that could affect the management system 7. Recommendations for improvement <p>The management was transparent to address continuous suitability, adequacy and effectiveness of the requirements for effective implementation of RSPO.</p> <p>Therefore, the previous Minor NCR STK 01 2020 was satisfactory closed.</p> <p>Status: Closed</p>

RSPO PUBLIC SUMMARY REPORT

3.3.2 RZ 05 2020	Minor	<p>Finding: Instructions given during meeting not consistently implemented. 2. Recruitment of workers Policy not implemented.</p> <p>Objective evidence:</p> <ol style="list-style-type: none"> 1. Instructions and briefings given during Women and Children Committee meeting dated 30 Oct 2019 and 17 May 2019 that parents should not send sick children to the crèche was not implemented when a sick and coughing child was seen present at the Saremas 2 crèche. 2. At least two migrant workers at the Saremas 2 Palm Oil Mill (Worker No. RM/SMP2/0819/438 and RM/SMP2/0819/442) have been asked to pay to the agents and/or representatives of P.T. Persada Duta Utama the sum of RM1,800 and RM2,200 respectively. 	<p>Based on interview with the workers, Documented foreign workers are not subjected to any recruitment fee. Foreign workers who choose to keep their passports at the office have done so with their written consent. This include Saremas 2 Estate, Segarmas and Kaminsky Estate. Auditor also interview back with past two migrant workers at the Saremas 2 Palm Oil Mill (Worker No. RM/SMP2/0819/438 and RM/SMP2/0819/442) Wilmar already payback to them the sum of RM1,800 and RM2,200 respectively. Thus Past Minor RZ 05 2020 was successfully closed</p> <p>Status: Closed</p>
3.4.3 DA 02 2020	Major	<p>Finding: The environmental management and monitoring plan was not fully implemented.</p> <p>Objective evidence:</p> <p>Control measures for maintenance of vehicle and equipment activities was not fully implemented. During site visit at Contractor (Lata Sehijau Transport CO.) Workshop Saremas 2 Estate, sighted oil spillage near to watercourse.</p>	<p>Sighted during site visit, all the control measures are in place and been implemented including at contractor workshop including Contractor (Lata Sehijau Transport CO.), The contractors workshop also has been demolished, Workshop Saremas 2 Estate, and estate workshop. Hence NCR DA 02 2020 effectively closed.</p> <p>Status: Closed</p>
3.6.1 DA 03 2020	Major	<p>Finding:</p> <ol style="list-style-type: none"> 1) Certain activities for risk control was not monitored and assessed 2) Safety mitigation plans are not implemented and monitored <p>Objective evidence:</p> <ol style="list-style-type: none"> 1) The HIRARC form for risk control replanting activities i.e. planting palm and nursery activities was not monitored and assessed. 2) During site visit at Saremas 2 Estate Contractor (Lata Sehijau Transport CO.) Workshop, sighted an acetylene tanks which was not chained and fixed securely causing the risk of an explosion. 	<p>Sighted the latest HIRARC form review date was on 01/03/2022 to include on 'Pengendalian Compactor and Motor Grader,'Pemasangan Culvert dan Pengendalian Forklift and replanting related to Past NCR DA 03 2020, Among the action that had been monitored were acetylene tanks found are well chained and securely fixed at storage area. auditor also sighted the HIRARC already monitored by the PIC, hence The NCR effectively closed.</p> <p>Status: Closed</p>

RSPO PUBLIC SUMMARY REPORT

4.1.1 RZ 04 2020	Major	<p>Finding: The policy to respect human rights and prohibiting retaliation against HRD has not been communicated.</p> <p>Objective evidence: There is nil to low understanding of what HRD is and the prohibition against retaliation against HRDs among all levels of workforce and local communities. There is no record that the policy has been communicated to all levels of the workforce, operations, FFB suppliers and local communities.</p>	<p>At Saremas 2 CU, a briefing on the policy to respect human rights, including prohibiting retaliation against Human Rights Defenders was given as follows:</p> <ul style="list-style-type: none"> ▪ During external stakeholder consultation via “<i>Community Base Development Committee (CBDC)</i>” at on 10/01/2022; ▪ During contractor consultation meeting on 25/02/2022; ▪ During muster briefing for all level of the workforce and operations at Saremas 2 Estate on 01/03/2022, 03/03/2022; ▪ During muster briefing for all level of the workforce and operations at Segarmas Plantations on 25/02/2022, 26/02/2022; ▪ During muster briefing for all level of the workforce and operations at Kaminsky Plantations on 02/04/2022, 28/03/2022; ▪ Sighted The training regarding Human Rights has been conduct at POM on 25/1/22 for workers, 25/2/22 for external stakeholder, contractor and Villagers. 14/9/2021 for 152 workers and 15/3/2022 for contractors at Segarmas Estate, <p>The understanding among all levels of workforce, operations and local communities of what HRD and the prohibition against retaliation towards HRDs was increased. It was noted that all of them were aware and understood related to HRD policies. For that reason, previous Major NCR RZ 04 2020 acceptable to closed.</p> <p>Status: Closed</p>
6.2.7 RZ 01 2020	Minor	<p>Finding: A casual worker at Segarmas Plantation is tasked with a job that is not temporary or seasonal in nature.</p> <p>Objective evidence: Worker No. SG/SGE/0119/1676 joined Segarmas Plantation on 20 Dec 2018 as a maintenance worker. Until the date of the audit she remains a casual maintenance worker and has no employment contract, no work permit and not listed in Segarmas Master List of Foreign Workers.</p>	<p>Generally, permanent and full-time employees are used to carry out core work such as harvesting, loose fruit collecting, sprayers and manurers. Based on all sampled workers, there was no casual workers or temporary worked in all estates. Auditor lalso verify and interview back Worker No. SG/SGE/0119/1676 and she already have employment contract and renewed work permit, SOCSO and Pay Slip Therefore, previous NCR, RZ 01 2020 was satisfactorily closed</p> <p>Status: Closed</p>
6.4.1 RZ 03 2020	Minor	<p>Finding: No prohibition against child labour has been included into service contracts and supplier agreements.</p> <p>Objective evidence: All contracts between the Saremas 2 CU and its suppliers and contractors do not contain any provisions that prohibit against child labour.</p>	<p>Sighted also at Contractor at POM namely Farjaya Shine Sdn Bhd (contract dated 8/2/2022), Pengangkutan Lean Soon Hung (Sarawak) Sdn Bhd (dated 3/8/2020), BTU Palm Oil Transport Sdn Bhd Sighted During this Audit, in Addendum of Comitment Business Conduct <u>Clause 3 and 4: Labour</u> of the contract included the statement contain clauses any provisions that prohibit against child labour, disallowing child, forced and trafficked labour. Where young workers are employed, the contracts also include a clause for children protection Thus, Past Minor NCR RAR 03 2020 has been successfully closed.</p>

RSPO PUBLIC SUMMARY REPORT

			<p><u>Kaminsky Estate</u> Agreement with Kaminsky Sdn Bhd and To Kok Ying dated 12/3/2022. The auditor has verified the agreement between Kaminsky Sdn Bhd and To Kok Ying, contains the provisions on prohibition against child labor. Therefore, previous NCR, RZ 03 2020 was satisfactorily closed.</p> <p>Status: Closed</p>
6.7.3 DA 04 2020	Major	<p>Finding: 1) Workers use appropriate personal protective equipment (PPE), was not provided free of charge to workers at the place of work to cover all potentially hazardous operations. 2) Workers did not wear the appropriate personal protective equipment (PPE). Objective evidence: 1) During interview with sampled harvesters and verification of "PPE Personal Record", there is no free of charge provided for personal protective equipment i.e. harvesters shoe. 2) During site visit at Segarmas Plantation B051 (Division 2), sighted 1 manurer did not wear appropriate PPE i.e. clinical mask.</p>	<p>During site visit at Saremas 2 Estate, Segarmas Plantation, Kaminsky Plantation at Harvesting Operation, Circle Spraying Operation and Manuring Operation, sighted they were seen to wearing PPE such as face masks respirators, goggles, harvesting shoes, rubber boots, nitrile/cotton gloves, apron and hard hat, to cover all potentially hazardous operations. Records of PPE issued and acknowledgement of receipt are maintained individually for all category of workers at estates. All workers were provided with appropriate PPE where the cost are bared by the management. Interviews conducted during the site visit at the 3 estates 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. As a result, previous NCR DA 04 2020 was satisfactory closed.</p> <p>Status: Closed</p>
7.7.4 STK 02 2020	Major	<p>Finding: A documented water and ground cover management program was not in place. Objective evidence: On Kaminsky Sdn Bhd at time of audit no documented water and ground cover management program was available for the peat area of 32.59 Ha in Blocks 033 & 034.</p>	<p>Saremas 2 CU i.e. Kaminsky Estate which has 32.59 Ha (Block 033 & 034) of Peat Soils have a documented water and ground cover management programme in place in the Wilmar Best Practices and Standard Operating Procedure for Management of Existing Oil Palm Cultivation on Peat Soils (Document no.SA 03/EMU/(07)/1021 dated 01/10/2021. Kaminsky Estate is also maintaining water table to Clay Soil underneath Peat layer with a drop of 8 cm from 437cm to 429 cm and water table to ground surface with an average of 28.91 cm per month using the Piezometer reading. Therefore, a Major Non-Compliance STK 02 2020 which was raised during the previous audit was satisfactorily closed</p> <p>Status: Closed</p>
7.8.2 DA 05 2020	Major	<p>Finding: Water courses and wetlands are not protected including maintaining and restoring appropriate riparian and other buffer zones Objective evidence: There is no evidence that water courses within Saremas 2 CU is being protected. There is also no evidence of</p>	<p>During site inspection, water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017). Therefore, previous NCR DA 05 2020 was satisfactory closed.</p>

RSPO PUBLIC SUMMARY REPORT

		maintenance and restoration of buffer zones along natural waterways. Sighted during site visit at Saremas 2 buffer zones, present natural vegetation has been removed for construction of water catchment.	Status: Closed
Supply Chain 5.5.2 RAR 03 2020	Major	Finding: There is no explicit procedures for the outsourced process Objective evidence: There is a procedure for RSPO SCCS was established. However, there is no explicit procedures for the outsourced process.	Auditor has verified evidences attached of documents revision RSPO Supply Chain Certification Procedure dated 01/02/2020. The revision has included explicit procedures for the outsourced process under clause 4 Outsourcing. Status: Closed

RSPO PUBLIC SUMMARY REPORT

ATTACHMENT 6 – Timebound Plan

Time Bound Plan of Wilmar International Limited

Malaysia

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

RSPO PUBLIC SUMMARY REPORT

Indonesia (Kalimantan)

No.	Company	Mill	Estate	Location	Certification year	Status
1	PT Mustika Sembuluh I	PT Mustika Sembuluh I mill	Mustika Sembuluh 1, Mustika Sembuluh 2, Mustika Sembuluh 3, KUD Bitu Maju Bersama	Central Kalimantan	2010	Certified; KUD was certified in 2014
2	PT Kerry Sawit Indonesia I	PT Kerry Sawit Indonesia I mill	Kerry Sawit Indonesia 1, Kerry Sawit Indonesia 2, Kerry Sawit Indonesia 3.	Central Kalimantan	2011	Certified
			KUD Karya Bersama, KUD Sejahtera Bersama, KUD Tabiku Makmur, KUD Kosudra	Central Kalimantan	2023	Re-Audit, initial certification to proceed after land title process
3	PT Bumi Sawit Kencana	PT Bumi Sawit Kencana mill	Bumi Sawit Kencana 1, Bumi Sawit Kencana 2,	Central Kalimantan	2013	Certified
4	PT Sarana Titian Permata 1	PT Sarana Titian Permata 1 mill	Sarana Titian Permata 1, Sarana Titian Permata 2, Sarana Titian Permata 3	Central Kalimantan	2023	Was certified till Nov 2017; certification to renew after HGU process
5	PT Sarana Titian Permata 2	PT Sarana Titian Permata 2 mill	Sarana Titian Permata 1, Sarana Titian Permata 2, Sarana Titian Permata 3	Central Kalimantan	2023	New mill constructed in 2017; initial certification to proceed after HGU process
6	PT Mustika Sembuluh 2	PT Mustika Sembuluh 2 mill	Mustika Sembuluh 1, Mustika Sembuluh 2, Mustika Sembuluh 3, KUD Bitu Maju Bersama	Central Kalimantan	2015	Certified
7	PT Mentaya Sawit Mas	PT Mentaya Sawit Mas mill	Mentaya Sawit Mas 1, Mentaya Sawit Mas 2,	Central Kalimantan	2015	Certified
			KUD Karya Makmur Pahirangan	Central Kalimantan	2023	Land title issue

RSPO PUBLIC SUMMARY REPORT

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