



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

File Ref. : EI03590001

RSPO PUBLIC SUMMARY REPORT

CLIENT : IOI CORPORATION BHD. – BUKIT LEELAU CERTIFICATION UNIT
PARENT COMPANY : IOI CORPORATION BHD.
RSPO MEMBERSHIP No.: 2-0002-04-000-00

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	
Bukit Leelau	Bukit Leelau Palm Oil Mill	03°18'00.0" N	103°08'24.0" E	KM 75 Kuantan-Segamat Highway, 26700 Muadzam Shah, Pahang.
	Bukit Leelau Estate	03°18'00.0" N	103°07'48.0" E	
	Detas Estate	03°33'00.0" N	103°03'00.0" E	KM 49 Kuantan-Segamat Highway, 26330 Gambang, Pahang.
	Merchong Estate	03°01'12.0" N	103°12'00.0" E	KM 23 Jalan Bukit Ibam-Rompin, 26700 Muadzam Shah, Pahang.
	Mekassar Estate	02°59'24.0" N	103°10'12.0" E	KM 24 Jalan Bukit Ibam-Rompin, 26700 Muadzam Shah, Pahang.
	Laukin A Estate	03°01'26.1" N	103°02'33.0" E	KM 72 Kuantan-Segamat Highway, 26700 Muadzam Shah, Pahang.

MAP : See Attachment 1

AUDIT DATE : 22-25 Aug 2022

DURATION : 21 auditor days

TYPE OF AUDIT :



Annual Surveillance Audit No.
2



Recertification Audit

STANDARD : MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

SCOPE OF CERTIFICATION: Production of Sustainable Crude Palm Oil and Palm Kernel Using Identity Preserved Supply Chain Model

VALIDITY OF RSPO CERTIFICATE : 19/11/2020 – 18/11/2025

The following attachments form part of this report:

Non-conformity Report(s)



List of additional site(s)



Report by Audit Team Leader

Acknowledgement by Client's Representative

Name : **MOHD AB RAOUF BIN ASIS**

Name : MOHAMAD ZULKARNAIN BIN ZUBIR AHMADI

Signature :

Signature :

Date : **5/12/2022**

Date : 09/12/2022

SUMMARY OF AUDITS

Recertification Audit					
On-site audit date	:	28 – 30/09/2020 & 01 – 02/10/2020	No. of auditor days:	23 Auditor Days	
Audit team	:	Dzulfiqar Azmi (LA), Mohd Ab Raouf Asis, Mohd Zulfakar Kamaruzaman, Rozaimiee Ab Rahman, Selvasingam T Kandiah.			
No. of major NCR	:	2	Indicator: 4.1.1, 6.7.3	Closing date: 18/12/2020	
No. of minor NCR	:	Nil	Indicator: Nil		
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
		/		/	/
		Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
		/	/	/	/
		Indigenous people	Contractors	Others (Please specify)	
		/	/		
Supply base sampled	:	Merchong Estate, Mekassar Estate, Laukin A Estate, Leepang A Estate.			
Changes since the last audit	:	Yes, changes of Planted Areas (Ha) and HCV Areas / Conservation Areas (Ha). The details in the "RSPO SUMMARY OF INFORMATION" refer Table 1 and Section 3.1 of the report.			
Justification of audit planning	:	Total allocation of auditor days for Bukit Leelau CU were: 23.0 auditor days Mill = 3 days (2 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems). Estates = 20 days for four estates for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title.			
Name of peer reviewer	:	Dzolkhifli Omar			
Report approved by	:	Kamini M. Sooriamoorthy	Approval date:	13/01/2021	

Surveillance 1 Audit					
On-site audit date	:	20-25/09/2021	No. of auditor days:	28 Auditor Days	
Audit team	:	Dzulfiqar Azmi, Mohd Ab Raouf Asis, Mohd Zulfakar Kamaruzaman, Rozaimiee Ab Rahman, Rahayu Zulkifli.			
No. of major NCR	:	6	Indicator: 7.7.5, 7.8.2, 3.4.3, 6.2.4, 6.6.1, 2.1.1	Closing date: 24/12/2021	
No. of minor NCR	:	3	Indicator: 7.7.2, 3.4.2, 3.3.2		
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	:	Bukit Leelau POM and 100% supply base i.e. Merchong Estate, Mekassar Estate, Leepang A Estate, Laukin A Estate, Detas Estate, Bukit Leelau Estate			
Changes since the last audit	:	<u>Detas Estate</u> Total planted increase 4ha replanting oil palm due to the returning off the encroached area by Felda Lepar Hilir (4.25ha). Balance 0.25ha adjusted to roads. Increase 0.2ha of river area due to GIS remapping. <u>Merchong Estate</u> Increase of 18.10ha total area, resulting from the remapping done by the GIS Department. The latest declared area is consistent with the estate land title area i.e. 1,952.50ha.			
Justification of audit planning	:	100% sampling covering all estates, as the respond to the external complaint received and recorded by RSPO through the RSPO Case Tracker RSPO/2020/19/IR.			
Name of peer reviewer	:	NA			
Report approved by	:	Kamini M. Sooriamoorthy	Approval date:	29/12/2021	

Surveillance 2 Audit				
On-site audit date	:	22-25 August 2022	No. of auditor days:	21
Audit team	:	Mohd Ab Raouf bin Asis (LA), Rozaimée bin Ab Rahman, Ismail Adnan bin Abdul Malik, Rahayu binti Zulkifli		
No. of major NCR	:	3	Indicator: 3.3.2, 6.6.2, 6.2.2	Closing date: 24/11/2022
No. of minor NCR	:	Nil	Indicator : N/A	
Indicate by ticking the stakeholders interviewed during the on-site audit	:	Employees / Workers organizations	Settlers	Villagers / Local communities
		/		/
		Contract workers	Local & National NGOs	Govt. agency / Statutory bodies
		/		
		Indigenous people	Contractor	Others (Please specify)
		/	/	
Supply base sampled	:	Bukit Leelau POM, Bukit Leelau Estate, Detas Estate, Mekassar Estate, Merchong Estate.		
Changes since the last audit	:	Leepang A Estate not in Bukit Leelau CU anymore due to transfer to Pukin Grouping.		
Justification of audit planning	:	Bukit Leelau POM-5 mandays (including 1 manday for SC) 4 days each for Bukit Leelau Estate, Detas Estate, Mekassar Estate, Merchong Estate All supply bases including mill covering for Social internal and external, Safety, Environment, GHG, Metrics Template, Good Agricultural Practices, HCV and Time Bound Plan.		
Name of peer reviewer	:	NA		
Report approved by	:	Kamini M. Sooriamoorthy	Approval date :	5/12/2022

SUMMARY OF INFORMATION

TABLE 1

	RA	ASA 1	ASA 2	ASA 3	ASA 4
*Projection Period / Reporting Period	September 2020 – August 2021	September 2021 – August 2022	August 2022 – July 2023		
Certified FFB Processed (MT)	232,240.00	249,828.00	211,090.00		
Production of Certified CPO (MT)	54,810.43	54,810.43	50,659.00		
Production of Certified PK (MT)	10,563.59	10,563.59	8,971.33		
Certified Areas (Ha)	11,489.17	**11,507.27	***9,178.49		
Planted Areas (Ha)	9,726.00	**9,730.00	***7,901.00		
Production Areas (Ha)	9,247.00	9,542.00	7,897.00		
HCV Areas / Conservation Areas (Ha)	*29.43	**29.63	29.63		
REMARKS	<p>RA-2020: *6.77 Ha due to GIS adjustment and mapping</p> <p>ASA1-2021: **Updates in certified & planted area due to the changes in Detas & Merchong Estate reported area.</p> <p>Detas Estate</p> <ol style="list-style-type: none"> Total planted increase 4ha replanting oil palm due to the returning off the encroached area by Felda Lepar Hilir i.e. 4.25ha. Balance 0.25ha adjusted to roads. Increase 0.2ha of river area due to GIS remapping. <p>Merchong Estate</p> <ol style="list-style-type: none"> Increase of 18.10ha total area, resulting from the remapping done by the GIS Department. The latest declared area is consistent with the estate land title area i.e. 1,952.50ha. <p>ASA2-2022:</p> <p>Detas Estate</p> <ol style="list-style-type: none"> Variance 0.76ha of river area due to declared as seasonal river after remapping and revised inventory mapping statistic by GIS in November 2021 Increase 74.92ha certified area due to updated new land title area by GIS department and admin department. Please refer to indicator 4.4.1 for further justifications. <p>Mekassar Estate</p> <ol style="list-style-type: none"> Reduced 0.02ha pond area due to some area change description to water treatment plan by GIS dept. Variance 0.24ha river area due to declared as seasonal river after remapping done by GIS department <p>Leepang A Estate</p> <ol style="list-style-type: none"> Leepang Estate had been transferred to Pukin grouping (2,403.70) 				

TABLE 2

	PO	PK
Last years certified volume (MT)	54,810.43	10,563.59
Last years actual certified sold (MT)	32,580.37	5,789.91
Last years actual sold under other schemes (MT)	-	-
Last years sold conventional (MT)	1,429.82	-
Last year actual sold CSPO credits (where applicable)	-	-
New year certified volume (MT)	50,659.00	8,971.33

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1.0 AUDIT PROCESS

1.1 Certification Body

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

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

1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Mohd Ab Raouf bin Asis	Lead Auditor	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.
Rozaimie bin Ab Rahman	Auditor, Safety and Environment	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 SC and MSPO.
Rahayu binti Zulkifli	Auditor, Social	Rahayu graduated with LLB (Hons) from the United Kingdom in 1988. She practiced in a law firm before she headed the Legal Departments of two public listed companies from 1995 to 2003. Rahayu has been a freelance auditor since 2016, carrying out audits specifically on social aspects of the RSPO and MSPO standards, with audit experiences in Malaysia, Indonesia and Ghana.
Ismail Adnan bin Abdul Malik	Auditor, Social and HCV	Holds a Master of Forestry, University of British Columbia, Canada. Years spent in forestry related activities prior being the Senior Lecturer at the Forestry Faculty, Universiti Putra Malaysia and currently as Forest Auditor at the Food, Agriculture and Forestry, SIRIM QAS International Sdn Bhd, since 2016.

1.3 Audit methodology

The audit covered the Bukit Leelau Palm Oil Mill and four (4) of its supply base. The sampling methodology applies for supply base with higher than four estates. The sampling shall be conducted in conformance with the requirement specified in the RSPO Certification Systems Document, Nov 2020. The 4 supply base covered during the audit are Bukit Leelau Estate, Merchong Estate, Mekassar Estate and Detas Estate. The audit included an on-site audit to the estates, mill and settlers' houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

1.4 Stakeholder Consultation

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

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (local / foreign / Orang Asli workers / male & female)	<p>All employees interviewed during the audit expressed their satisfaction working with Bukit Leelau CU. Issues raised during ECC (between workers and workers' representatives) and the subsequent JCC (between worker representatives and management) meetings have been given consideration and actions taken.</p> <p>All levels of workers interviewed are fully aware of company policies such as whistleblowing, ethics, anti-corruption and bribery, recognition of workers' rights to freedom of association, equality, policies against discrimination, abuse and sexual harassment, child labour, human trafficking, no passport retention, non-payment of recruitment fee for foreign workers, etc. The workers were also aware of the grievance mechanism process available to them such as the Green Book, whistleblowing, and option to call HQ in Putrajaya directly.</p> <p>No female workers work in the field except for Bukit Leelau Estate where female workers work at the nursery. Spraying and fertilising are being handled by male workers. Workers also confirmed that there is no discrimination, they receive equal pay for equal job irrespective of gender and nationality, wages are paid on 7th of every month, and that from May 2022, they have been paid minimum wages of RM1,500 per month. Workers also confirmed that they understand the contents of the monthly payslips.</p> <p>The workers were also satisfied with the housing amenities provided. These included surau, filtered water, football field, futsal court, subsidised electricity, free medical treatment at estate clinics and/or panel clinics, sundry shop, canteen, etc. Some workers highlighted the higher-than-normal prices at the estate shop, but also acknowledged that prices have generally arisen, and that the sundry shop operators had to take into account the cost of transportation to the estates.</p>
2) Settlers	Not applicable
3) Villagers / Local communities (including women representatives, displaced communities)	Interviewed local communities' representatives. They are actually indigenous people (Orang Asli). So far, no issue has been highlighted. Tok Batin has a good relationship with the estate management and aware of complaint channel available at the CU.
4) Suppliers	Representatives from Suppliers were interviewed. Terms of purchase/sale documents were understood by suppliers. Payment was received by suppliers not later than 60 days. one month of invoice. They are also aware of the complaint channel. There are no issues with the estates and mill. They receive invitations to attend stakeholder meetings but sometimes cannot attend.
5) Contract workers (local / foreign / Orang Asli workers / male & female)	Not applicable
6) Local & national NGOs	Not applicable

7) Government agencies / Statutory bodies	Interview with Forestry Department and PERHILITAN personnel from Bukit Ibam. No issue raised.
8) Independent growers / Smallholders	Not applicable
9) Indigenous people	Interview with Tok Batin representing the indigenous people in the CU. So far, no issue has been highlighted. Tok Batin has a good relationship with the estate management and aware of complaint channeled was available at CU.
10) Contractor	<p>Interviewed the suppliers, related to understanding on payment and no child labour has been conducted.</p> <p>The contractors confirmed that they are aware of their obligations under the contract (ensuring workers have valid passports and work permits, payment of wages by the 7th of every month, SOCSO protection for workers, etc). Contractors also confirmed that there are no adverse issues with Bukit Leelau estates and POM estates. They are invited to attend online stakeholder meeting and are briefed of the company policies and procedures. Payments are received within agreed timeframe.</p> <p>No issue from contractor to CU and them understand related the company policy and RSPO requirements.</p>
11) Previous land owner (if any)	No issue with previous landowner, hence, not applicable
12) Others (please specify)	Not applicable

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 Bukit Leelau Certification Unit is one of the business units under the IOI Corporation Berhad. The CU consists of Bukit Leelau Oil Mill, Bukit Leelau Estate, Detas Estate, Merchong Estate, Mekassar Estate and Laukin A Estate. During the Surveillance 2 Audit in 2022, Leepang A has been transferred to the Pukin Grouping. Hence, Leepang A not included in the sample for Bukit Leelau CU.

Bukit Leelau Oil Mill, Bukit Leelau Estate, Detas Estate, Mekassar Estate and Leepang A Estate are the subsidiaries of Perusahaan Mekassar (M) Sdn.Bhd. while Merchong Estate is the subsidiary of Syarikat Pukin Ladang Kelapa Sawit Sdn.Bhd. Syarikat Pukin Ladang Kelapa Sawit Sdn. Bhd. and Perusahaan Mekassar (M) Sdn. Bhd. are the subsidiaries of IOI Corporation Berhad. The registration of RSPO Supply Chain in the RSPO PalmTrace for traceability of sustainable crude palm oil is under the name of Perusahaan Mekassar (M) Sdn. Bhd. The Bukit Leelau Oil Mill has a processing capacity of 45 metric tonnes of fresh fruit bunches (FFB) per hour. Bukit Leelau CU all estates have been fully developed before the year of 2005.

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

The FFB is sourced from company owned estates in the Bukit Leelau CU, IOI Sister Estates and Certified Outsider Estates. The details of the FFB actual and projected contribution from each source to the mill are shown in the following tables:

**Table 1: Actual FFB production by the supply base for the reporting period
(September 2021 – July 2022)**

Estates	FFB Production		Certifying CB
	Tonnes	Percentage (%)	
Bukit Leelau Estate	29722.14	19.22	SIRIM
Detas Estate	53288.65	34.47	SIRIM
Merchong Estate	33672.95	21.78	SIRIM
Mekassar Estate	17369.43	11.23	SIRIM
Laukin A Estate	16098.23	10.41	SIRIM
IOI Sister Estate			
Leepang A Estate	4462.81	2.89	INTERTEK
Shahzan 1 Estate	0	0	-
Shahzan 2 Estate	0	0	-
Pukin Estate	0	0	-
Certified outsider crop			
Sungai Jernih Estate	0	0	-
Bebar Estate	0	0	-
Total	*154614.21	100	-

*The CU is experiencing shortage of labour, causing higher harvesting interval and less crop production.

**Table 2: Projected FFB production by supply base for the reporting period
(Aug 2022 – July 2023)**

Estates	FFB Contribution	
	Tonnes	Percentage (%)
Bukit Leelau Estate	44934.50	21.29
Detas Estate	61985.50	29.36
Merchong Estate	49990	23.68
Mekassar Estate	30760	14.57
Laukin A Estate	23420	11.09
Grand Total	211,090.00	100

Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period (September 2021 – July 2022)

RSPO Supply Chain Model: Identity Preserved	Total (MT)
FFB Received	154,614.21
FFB Processed	154,614.21
CPO Production	36,364.58
PK Production	6,346.41
CPO delivered as RSPO certified	32,580.37
CPO delivered under other schemes (MT)	-
CPO delivered as non-RSPO certified	1,429.82
PK delivered as RSPO certified	5,789.91
PK delivered under other schemes (MT)	-
PK delivered as non-RSPO certified	-
Credits traded through Books and Claim	-

Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period Aug 2022 – July 2023

RSPO Supply Chain Model: Identity Preserved	Total (MT)
FFB Received	211,090.00
FFB Processed	211,090.00
CPO Production	50,659.00
PK Production	8,971.33

Table 5 Planted and certified area of the CU

Estate	Planted (ha)	Certified (ha)
Bukit Leelau Estate	1946.00	2096
Detas Estate	2125.00	2300.70
Merchong Estate	1797.00	1952.50
Mekassar Estate	1126.00	1209.39
Laukin A Estate	907.00	1619.90
TOTAL	7,901.00	9,178.49

Table 6: Planting profile for Bukit Leelau Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
1998	1 st Cycle	Mature	95	4.88
1994	2 nd Cycle	Mature	239	12.28
2015	2 nd Cycle	Mature	302	15.52
2016	2 nd Cycle	Mature	404	20.76
2017	2 nd Cycle	Mature	430	22.10
2018	2 nd Cycle	Mature	476	24.46
TOTAL	-	-	1946	100

Table 7: Planting profile for Detas Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2009	2 nd cycle	Mature	100	4.71
2010	2 nd cycle	Mature	172	8.09
2011	2 nd cycle	Mature	350	16.47

2012	2 nd cycle	Mature	155	7.29
2013	2 nd cycle	Mature	244	11.48
2014	2 nd cycle	Mature	466	21.93
2015	2 nd cycle	Mature	359	16.89
2016	2 nd cycle	Mature	272	12.80
2018	2 nd cycle	Mature	3	0.14
2020	1 st cycle	Immature	4	0.19
TOTAL	-	-	2125	100

Table 8: Planting profile for Merchong Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2003	2 nd cycle	Mature	191	10.63
2004	2 nd cycle	Mature	291	16.19
2005	2 nd cycle	Mature	139	7.74
2006	2 nd cycle	Mature	367	20.42
2007	2 nd cycle	Mature	264	14.69
2008	2 nd cycle	Mature	145	8.07
2010	2 nd cycle	Mature	400	22.26
TOTAL	-	-	1797	100.00

Table 9: Planting profile for Mekassar Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2004	1 st cycle	Mature	263	23.36
2005	1 st cycle	Mature	285	25.31
2006	1 st cycle	Mature	200	17.76
2008	1 st cycle	Mature	101	8.97
2009	1 st cycle	Mature	277	24.60
TOTAL	-	-	1126	100.00

Table 10: Planting profile for Laukin A Estate

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
2002	1 st cycle	Mature	907	100
TOTAL	-	-	907	100

2.3 Organizational Information/Contact Person(s)

The details of the contact person are as below:

Name	:	Agos bin Atan
Position	:	Senior Manager, Sustainability
Address	:	IOI Plantation Services Sdn. Bhd. (1050782-T) Sustainability Department, Gomali Estate, 5th Mile Jalan Gemas Batu Anam, KB. No. 102, 85100 Batu Anam, Segamat, Johor
Phone no.	:	Office – 07-9497043 Hand phone -016-2651852 & 011-25215092
Fax no.	:	-
Email	:	agos@ioigroup.com

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 :

IOI Corporation Berhad is in progress to certify 5 CU's from 2020 to 2021 as verified through
Time Bound Plan dated 30/06/2022

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

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

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

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

If no, please state reasons

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

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

Changes on the Leepang A Estate has been transferred to the Pukin Grouping.

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

* If not closed, minor nonconformity will be upgraded to major nonconformity

3.5. Complaint received from stakeholder (if any)

No complaint received from the stakeholders

4.0 DETAILS OF NON-CONFORMITY REPORT

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

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

Total no. of major NCR(s)
(details refer to Attachment 3) List : **3.3.2, 6.6.2, 6.2.2**

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

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

List :

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

5.0 AUDIT CONCLUSION

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

6.0 RECOMMENDATION

No NCR recorded. Recommended to continue certification.

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

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

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


Recommended to continue certification.

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

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

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

Audit Team Leader : MOHD AB RAOUF BIN ASIS

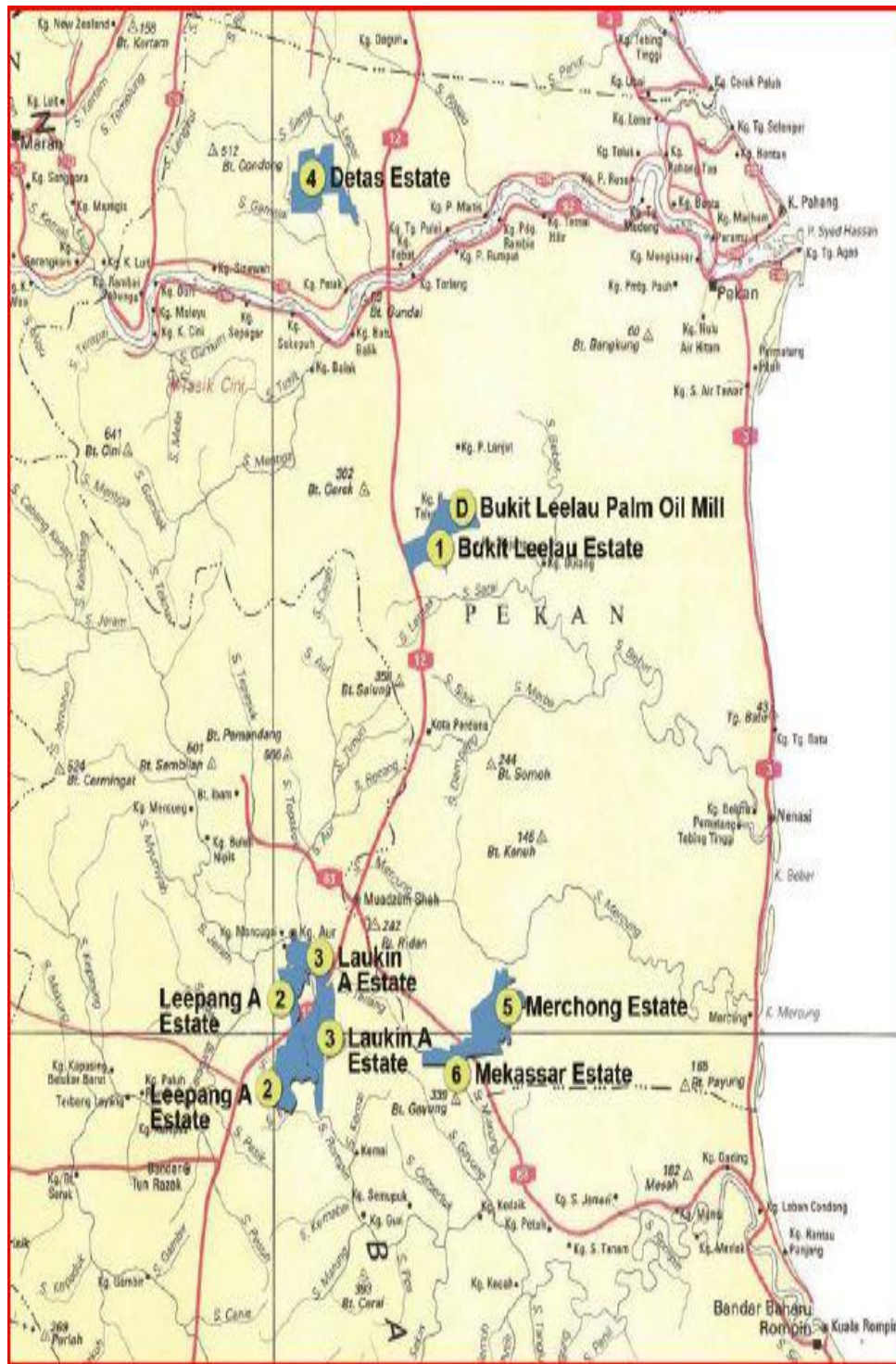


24/11/2022

(Name)

(Signature)

(Date)



SURVEILLANCE AUDIT PLAN

Objectives

The objectives of the audit are as follows:

- (i) To determine Certification Unit conformance against the relevant certification standards.
- (ii) To verify the effective implementation of corrective actions arising from the findings of last audit.
- (iii) To make appropriate recommendations based on the audit findings.

Date of assessment : 22- 26 August 2022

Site of assessment : Bukit Leelau CU

- i) Bukit Leelau POM
- ii) Bukit Leelau Estate
- iii) Detas Estate
- iv) Merchong Estate
- v) Mekassar Estate

Reference Standard :

- a. MYNI 2019 of RSPO P&C 2018 / ~~RSPO Independent Smallholder Standard, Nov 2019 / RSPO Management System Requirements and Guidance for Group Certification of FFB Production, March 2018~~
- b. RSPO Certification System Documents, Nov 2020
- c. Company's audit criteria including Company's Manual/Procedures

Assessment Team

- i) Lead Auditor: Mohd Ab Raouf bin Asis (MAR) – Safety, TBP, Metrics Template
- ii) Auditor: Rozaimie bin Ab Rahman (RAR) – SC, Env
Mohd Norddin bin Abd Jalil (MN) - GAP
Rahayu binti Zulkifli (RZ) – Internal Employees (Social)
Ismail Adnan Abdul Malik (IA) – HCV, External Stakeholder (Social)

If there is any objection to the proposed audit team, the organization is required to inform the Lead Auditor/RSPO Section Manager.

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.

Audit Findings

Audit findings shall be classified as major and/or minor. Major nonconformities shall be addressed within 90 days or else the certificate shall be suspended. If the major nonconformities 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 nonconformities raised in the surveillance audit, corrective action shall be verified in the next audit. These shall be upgraded to major nonconformities if the corrective actions are not satisfactorily implemented in the next audit.

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.

Working Language : English and Bahasa Malaysia

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.

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

Assessment Programme Details : As below

Time	Activities / areas to be visited	Auditee
8.30am	Opening Meeting at Detas Estate – Audit team introduction and briefing on assessment objectives, scope, methodology, criteria and programmes by SIRIM QAS Audit Team Leader.	
8.45am	Briefing on the organization background and implementation of RSPO at CU (including actions taken to address previous audit findings) by company Management Representative. Logistics discussion to the sites to be visited.	Management Representative
9.00am	To assign each audit team members – site and the P&C requirements	
	<p style="text-align: center;">(Raouf, Rozaimée, Rahayu, Ismail, Norddin) Detas Estate</p> <ul style="list-style-type: none"> • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with employees, contractors, etc • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Stakeholder consultation with affected communities surrounding the estate • Land titles user rights • Good agriculture practices • New planting • Occupational safety & health aspects, chemical management • Legal & Other requirement • Time Bound Plan • Metrics Template • Info required • Environmental management, waste & chemical management • GHG Calculation • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone 	
12.30pm	LUNCH BREAK	All
14.00pm	Continue assessment	Guide(s) for each auditor
16.00 - 18.00pm	Audit team discussion / End of Day 1 audit	All

Day 2: Tuesday (23/8/2022).

Time	Activities / areas to be visited	Auditee
8.30am	Overview of current activities at Supply base sites	Respective Scheme Manager
8.30am	To assign each audit team members – site and the P&C requirements	Guide(s) for each auditor
	(Raouf, Rozaimie, Rahayu, Ismail, Norddin) Mekassar Estate	Guide(s) for each auditor
	<ul style="list-style-type: none"> • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with employees, contractors, etc • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Stakeholder consultation with affected communities surrounding the estate • Land titles user rights • Good agriculture practices • New planting • Occupational safety & health aspects, chemical management • Legal & Other requirement • Time Bound Plan • Metrics Template • Info required • Environmental management, waste & chemical management • GHG Calculation • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone 	
12.30pm	LUNCH BREAK	All
14.00pm	Continue assessment	Guide(s) for each auditor
16.00 - 18.00pm	Audit team discussion / End of Day 2 audit	All

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Day 3: Wednesday (24/8/2022)

Time	Activities / areas to be visited	Auditee
8.30am	Overview of current activities at Supply base sites	Respective Scheme Manager
8.30am	To assign each audit team members – site and the P&C requirements	Guide(s) for each auditor
	<p style="text-align: center;">(Raouf, Rozaimiee, Rahayu, Ismail, Norddin) Merchong Estate</p> <ul style="list-style-type: none"> • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with employees, contractors, etc • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Stakeholder consultation with affected communities surrounding the estate • Land titles user rights • Good agriculture practices • New planting • Occupational safety & health aspects, chemical management • Legal & Other requirement • Time Bound Plan • Metrics Template • Info required • Environmental management, waste & chemical management • GHG Calculation • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone 	Guide(s) for each auditor
12.30pm	LUNCH BREAK	All
14.00pm	Continue assessment	Guide(s) for each auditor
16.00 - 18.00pm	Audit team discussion / End of Day 3 audit	All

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Day 4: Thursday (25/8/2022).

Time	Activities / areas to be visited	Auditee
8.30am	Overview of current activities at Supply base sites	Respective Scheme Manager
8.30am	To assign each audit team members – site and the P&C requirements	Guide(s) for each auditor
	<p align="center">(Raouf, Rozaimée, Rahayu, Ismail, Norddin) Bukit Leelau Estate</p> <ul style="list-style-type: none"> • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with employees, contractors, etc • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Stakeholder consultation with affected communities surrounding the estate • Land titles user rights • Good agriculture practices • New planting • Occupational safety & health aspects, chemical management • Legal & Other requirement • Time Bound Plan • Metrics Template • Info required • Environmental management, waste & chemical management • GHG Calculation • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone 	Guide(s) for each auditor
12.30pm	LUNCH BREAK	All
14.00pm	Continue assessment	Guide(s) for each auditor
16.00 - 18.00pm	Audit team discussion / End of Day 4 audit	All

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Day 5: Friday (25/8/2022).

Time	Activities / areas to be visited	Auditee
8.30am	Overview of current activities at Supply base sites	Respective Scheme Manager
8.30am	To assign each audit team members – site and the P&C requirements	Guide(s) for each auditor
	<p align="center">(Raouf, Rozaimée, Rahayu, Ismail, Norddin) Bukit Leelau POM</p> <ul style="list-style-type: none"> • Assessment of Supply Chain System Requirement • Social aspects -SIA, management plan & implementation, workers' quarters, • Stakeholder consultation with employees, contractors, etc • Interview with gender committee, safety committee, worker representative, contractors, supplier, etc. • Stakeholder consultation with affected communities surrounding the estate • Land titles user rights • Good agriculture practices • New planting • Occupational safety & health aspects, chemical management • Legal & Other requirement • Time Bound Plan • Metrics Template • Info required • Environmental management, waste & chemical management • GHG Calculation • Inspection of protected sites with HCV attributes, forested area, plantation boundary, adjacent and neighbouring land use, riparian zone 	Guide(s) for each auditor
12.30pm	LUNCH BREAK	All
14.00pm	<p align="center">Continue assessment Verification on outstanding issues for CU Auditor to inform auditee on the required document / records Continue Audit Team discussion and preparation of assessment findings.</p>	Guide(s) for each auditor
16.00 - 18.00pm	<p align="center">Discussion and acceptance on assessment findings with Management Representative and visited site Plantation / Scheme Manager Closing meeting at CU End of audit</p>	All

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Attachment 3

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

Principle 1: Behave ethically and transparently

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

Clause	Indicators	Comply Yes/No	Findings
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	Yes	Publicly available management documents such as land titles, OHS plans, EIA, SIA, HCV documentation, pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, RSPO Public Summary Report, company policies and continual improvement plans are available and can be cross referred to their respective criterion. All operating units have individual documents and records to demonstrate compliance to this indicator. IOI Group documents are also accessible through their Group's website link: http://www.ioigroup.com .
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	Yes	Information provided in both English and Bahasa Malaysia and accessible to all stakeholders in IOI complex. More information can be access through https://www.ioigroup.com/Content/S/S_Define
	1.1.3 (C) Records of requests for information and responses are maintained.	Yes	The Bukit Leelau CU have identified personnel responsible for complaints. Records of communication (classified as internal and external) were identified and maintained in different files, depending on the stakeholders. Among the records reviewed were correspondences with the authorities, local communities and employees. The latest communications sighted in these records were the "Borang Aduan" requesting repairs of the employee's houses. The procedure for responding to any communication has been outlined in "The Flow Chart" and displayed at the notice boards in the mill/estates office and muster grounds.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	Yes	Consultation and communication procedure is available and documented under Standard Operating Procedure on Sustainability – Grievance Procedure is in place and is applicable to employees, stakeholders, public, etc. Consultation and communication procedure for Bukit Leelau CU is outlined in 'Stakeholder Request Procedure', 'Grievances Reporting Flow Chart' and 'Grievance Procedure for Landowner Issues'. These documents were made available during the audit. Interviews conducted with the workers also showed that they are aware of this communication and consultation procedures.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	Yes	Stakeholder lists for all the units under Bukit Leelau CU were all available and sighted during the audit, and updated as of 2021. They each comprise relevant government agencies such the Department of Environment, the Labour Office, Department of Wildlife

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Clause	Indicators	Comply Yes/No	Findings
			and National Parks, PERKESO, canteen operators, contractors, suppliers, neighbouring estates, nearby villagers, schools, Department of Orang Asli Development (JAKOA), government district clinic.
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	Bukit Leelau CU is bound by IOI's 'Code of Business Conduct & Ethics' policy. Among others, this Policy calls for respect for fair conduct of business and prohibition against bribery. This Policy is displayed on notice boards within the estate and mill premises.
	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	Yes	Compliance with the Code of Business Conduct & Ethics' is being monitored via internal and external financial audits. Furthermore, Internal audit by Sustainability Team and Safety and Health Team also conducted once a year.

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	Based on samples taken, there is evidence that the Bukit Leelau CU has demonstrated its compliances to legal requirements
	2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	Yes	The Certification Unit continued to use their established Legal Requirement Register. The document last reviewed in Apr 2022 by Head office IOI Legal Department. Changes to the law and regulation are monitored by the Sustainability Team. Various sources were referred in obtaining information updates of legal requirements. This includes subscription to Lexis-Nexis Advance Malaysia, news release through printed and online newspaper.
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	Yes	Auditor has verified that, authorised boundaries that clearly demarcated in applicable places. All boundaries sighted above were clearly demarcated and visibly maintained. The markers poles were painted red and white stripes.
2.2 All contractors	2.2.1 A list of contracted parties is maintained.	Yes	A list of contracted parties was maintained in the list of stakeholders for Bukit Leelau CU's. The list of stakeholders was verified in each operating business visited.

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Clause	Indicators	Comply Yes/No	Findings
providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	Yes	There is evidence that agreements with third parties contain clauses on meeting applicable requirements. Evidence of legal due diligence carried out includes getting the vendors to comply with rules relating to labour and human rights, company ethics and management practices, and would comply with all laws and regulations relating to anti-bribery, fraud and corruption.
	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 signed with contractors contain a clause on compliance with employment laws, which would include laws related to employment of children and young persons. Based on records available, interviews conducted, and observations made during the audit, there was no evidence of any young persons employed within Bukit Leelau CU.
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 IOI Plantation Berhad owned estates which are certified to RSPO (Detas, Bukit Leelau, Merchong, Mekassar, Laukin and Diversion from Outsider Certified RSPO which is Boustead Sungai Jernih Estate and Bebar Estate. Bukit Leelau POM also is an Identity Preserved Mill. All 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, were available.
	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 IOI Plantation Berhad owned estates which are certified to RSPO (Detas, Bukit Leelau, Merchong, Mekassar, Laukin) and Diversion from Outsider Certified RSPO crop.

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

Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.	3.1.1 (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	Yes	Bukit Leelau CU continued to have documented business plans with projections until the financial year 2026/2027. At the estates, the budget provisions covered activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, and RSPO compliance. Attention was given to crop projection, cost of production, cost per ton and per hectare indicators to monitor the performance of each operating unit. The cost of production was reviewed and compared against expenditure each year with projections in place for future years.
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	Yes	Bukit Leelau CU had a Long-Range Replanting Program up to 2029/2030. The program was reviewed annually. There is no replanting for the next 5 years in Detas, Merchong, Mekassar, and Bukit Leelau Estates.
	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 for Bukit Leelau CU were conducted for Detas Estate, Merchong Estate, Mekassar Estate, Bukit Leelau Estate on 02/08/2022. The management review was attended by all the managers and estate management. Management is transparent to address continuous suitability, adequacy and effectiveness of the requirements for effective implementation of RSPO.
3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	Yes	The continuous improvement plan was available dated in July 2022. Based on the CIP, it covers social, environment, safety and technology sampling on financial year 2022/2023.
	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	Yes	Auditor has verified all the data in metric template was accurate as per reported.
3.3 Operating procedures are appropriately documented, consistently	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	Yes	Bukit Leelau CU adopted the following documented manuals and documents as their standard operating procedures: <ol style="list-style-type: none"> 1. Group Standard Operating Procedures (StOP) 2. Safe Operating Procedure (SaOP) 3. Group Environmental Impact Assessment and Management Action Plans (GEIA) 4. IOI Group Policy Documents.

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Clause	Indicators	Comply Yes/No	Findings
implemented and monitored.	3.3.2 A mechanism to check consistent implementation of procedures is in place.	No	<p>5. Oil Palm Agricultural Policy (OPAP) July 2005</p> <p>During this surveillance audit, it was verified that Bukit Leelau CU was not able to demonstrate that there is consistent implementation of its own SIA Management Action Plans & Continuous Improvement Plans. The objective evidences were:</p> <ol style="list-style-type: none"> 1. The SIA Management Action Plans & Continuous Improvement Plans of Detas, Mekassar and Merchong Estates (reviewed on 18/8/2022) had specified that: <ol style="list-style-type: none"> a. Visiting Medical Officer (VMO) will visit the estate clinics once every 2 weeks. However, the VMO's visits were as follows: <ul style="list-style-type: none"> • At Detas Estate: once a month i.e., 24/6/2022, 27/7/2022, 2/8/2022. • At Mekassar Estate: once a month i.e., 20/4/2022, 18/5/2022, 15/6/2022, 20/7/2022, 18/8/2022. • At Merchong Estate once a month i.e., 20/4/2022, 18/5/2022, 22/6/2022, 20/7/2022, 18/8/2022. 2. Each estate is to carry out a price comparison of items sold between estate shops and shops outside the estate. However, this was either not carried out adequately or at all. <ul style="list-style-type: none"> • Detas Estate inadequately compared only the prices of eggs, chicken, sugar and cooking oil. • Mekassar Estate could not demonstrate that price comparison was carried out. <p>Although this is a Minor Non-Compliance, it has been upgraded to a Major Non-Compliance No. RZ 01 of 2022 because it is a repeat Minor Non-Compliance from the preceding surveillance audit.</p>
	3.3.3 Records of monitoring and any actions taken are maintained and available.	Yes	<p>BLPOM</p> <p>Monitoring from mill management related to operation has been carried out by daily basis such:</p> <ul style="list-style-type: none"> • Used oil record • Mill quality • Final discharge <p>Management of POM also conducted the management review on 2/08/2022 for review continuous suitability, adequacy, and effectiveness of the requirements for effective implementation of sustainability practices and decide of any changes, improvement and modification.</p> <p>All estates visited continued to maintain records of monitoring and any actions taken. Among the records sighted were Program sheets, Field cost books, Audits by Sustainability Officers, Harvesting Interval records, Rat baiting records, Fertiliser</p>

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Clause	Indicators	Comply Yes/No	Findings
			application records, Monthly Progressive Reports, scheduled wastes records, PPE Checklist etc. Visits to monitor implementation was made and reports produced by Plantation Director @ CEO, General Manager, Senior Manager and Agronomist. And also visit by Sustainability Team regarding implementation of RSPO and MSPO.
3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	Yes	There has been no new plantings or operations and therefore this indicator is not applicable.
	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	<p>A SEIA is available for all units within Bukit Leelau CU. The SEIA was prepared for the period 2020-2025 by IOI's internal Sustainability team. Every year, the SEIAs for each operating unit are reviewed and the most recent reviews were done on 18/8/2022. During the review, social management and monitoring plans were developed and updated based on inputs received from affected stakeholders. These included local communities, neighbouring estates, contractors, and internal stakeholders such as its own employees (local and foreigners). These inputs were obtained during external stakeholder meetings, Womens' Empowerment Committee, Joint Consultative Committee and Employees Consultative Committee meetings.</p> <p>The SIA had also recorded the discussions with workers of all operating units the impacts of Covid-19 on them and on their return to their countries of origin. Consultations were also recorded via JCC meetings and briefings done to workers on contract substitution, as well as their overtime and wage calculations.</p> <p>At Bukit Leelau Estate & POM environmental management plan has been discussed during stakeholder meeting conducted on 04/08/2022. Environmental management plan has been reviewed on 09/08/2022. There were no significant changes or impacts from estate activities to nearby stakeholder. Among of environmental issues has been discussed with participatory stakeholder such as fire prevention and control measures by CU, pollution prevention control from CU activities.</p> <p>For internal stakeholder environmental and monitoring plans have been developed during environmental meeting. Among of issues has been discussed such as:</p> <ul style="list-style-type: none"> • Previous issues • Status of diesel usage for past 3 months • Road maintenance • EFB & POME application • SW • Domestic waste

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Clause	Indicators	Comply Yes/No	Findings
			<ul style="list-style-type: none"> • Recycle waste • RTE • HCV areas • Buffer zones • Water management • Zero burning
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	Yes	<p>Significant environmental impact was derived from the environmental impact assessment evaluation. Those activities evaluated as significant were then monitored using the management control and mitigation measure established for each activity where the significant impacts occurred. The management has periodically reviewed the implementation and effectiveness of the established program.</p> <p>Meanwhile for mill activities and action plan 2022 regards to compliance to legal requirements, aspects/impacts, action plans, waste identification & disposal method, control of scheduled waste, list of pollutants and monitoring system, improvement plan. Positive and negative impacts are identified. So far, no timetable for changes identified.</p> <p>Environmental impact assessment has been updated in 09/08/2022. The impacts assessments were conducted to cover all estate operation such as upkeep immature & mature areas, harvesting, FFB collection, maintenance and repairs at workshop, scrap iron area, tractor washing bay, SW store, chemical store, fertilizer store, WTP, line site and office, transportation of fertilizer and spraying chemicals, etc.</p> <p>During this current surveillance audit, evidence was available that the social and environmental management and monitoring plan for all units within Bukit Leelau CU have been implemented, reviewed and updated regularly in a participatory way. The latest updates were carried out by all operating units on 18/8/2022. Sampled during this surveillance audit were records of consultations with external (neighbouring estates, contractors), and internal stakeholders (foreign and local workers), JCC, ECC and WEC meetings. The issues raised in the social management and monitoring plans for each operating unit have also been implemented. This included monitoring of shop prices at Merchong and Bukit Leelau Estates, comparing it with shops outside, getting feedback from workers on impacts of Covid-19 and how it affected their return to their countries of origin, addressing and creating awareness among the workers on contract substitution, and ensuring continuous awareness on overtime and wage calculation through awareness briefings.</p>
3.5 A system for managing human resources is in place.	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the	Yes	<p>All operating units within Bukit Leelau CU were able to demonstrate the documentation of its employment procedures for recruitment, selection, and hiring.</p> <p>For foreign workers, there was a Foreign Workers Recruitment Guideline & Procedure in Malaysia signed by N B Sudhakaran, Plantation Director dated October 2017 (Revised</p>

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Clause	Indicators	Comply Yes/No	Findings
	workers and their representatives where applicable.		July 2018). The company has also come out with repatriation and abscondment procedure. For Local workers there was an employment Procedures for Local Workers (Recruitment, Selection and Hiring), retirement and termination signed by N B Sudhakaran, Plantation Director dated October 2017.
	3.5.2 Employment procedures are implemented, and records are maintained.	Yes	Based on workers' files and records of employment such as letter of application, interview records, relevant qualification certificates, pre-employment medical tests, and letters of offer issued, evidence was available that the employment procedures are being implemented. Among the sampled workers were watchmen, harvesters, drivers, manurers and field workers at all operating units within Bukit Leelau CU.
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	An Occupational Safety, Health and Hygiene Policy has been established and signed by the Plantation Director. It is available in Bahasa Malaysia and English language. The policy has been communicated to all employees through briefings and hardcopy of policies were seen displayed at the estates notice boards. Based on interview was conducted to harvesters, spraying and manuring operator, observed they are aware and understood regarding occupational health and safety matters. The hazard identification, risk assessment and risk control (HIRARC) procedure were established. Bukit Leelau CU have conducted the risk assessment on all its operation as well as determining their control measures. DOSH HIRARC Guideline 2008 was used by the IOI Safety & Health Department, Peninsular Malaysia with consultation input from respective OU Assistant Manager (Estate and Mill) to guide them in developing the Register. Besides HIRARC and CHRA associated mitigation plans such as use of PTW, valid Certificated Equipment and Machineries, employment of Competent Person and for those entering confined space health clearance certificate from DOSH-Registered OHD were undertaken by the Operating Unit assessed.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	Yes	Occupational health and safety (OHS) management plan for Bukit Leelau CU had been established. The OHS management plan sighted addressed issues related to hazards and risks, legal register and its requirements for compliance, OSH awareness and training program, accident and emergency procedures, audiometric test, use of PPE, OSH Committee meetings, etc. Generally, the OSH plans for the year 2022 were acceptable. Besides that, the effectiveness of the H&S plan to address health and safety risks to people are monitored by estate management. Furthermore, safety and health team from Sustainability Department have carried out the internal audit with yearly basis to check the implementation.
3.7 All staff, workers, Scheme Smallholders,	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	Yes	A documented formal training programme 'Sustainability Program for the Year 2022 and records that covered aspects of RSPO Principles and Criteria was made available to the auditors. All the trainings conducted between early of the year i.e., Jan 2022 until July 2022.

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Clause	Indicators	Comply Yes/No	Findings
outgrowers, and contract workers are appropriately trained.	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.		
	3.7.2 Records of training are maintained, where appropriate on an individual basis.	Yes	As explained in indicator 3.7.1, all of the records training are maintained on an individual basis.
	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	Latest training has been carried out in June 2022 for critical control point and on 04/08/2022 for External Stakeholder/contractor (transporter) training has been conducted by assistant mill engineer.

SUPPLY CHAIN REQUIREMENTS FOR MILLS

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.1	Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, the inly MB Module is applicable.	Yes	From period September 2021 until July 2022 BLPOM obtained certified FFB from own certified supply base and certified IOI Sister Estates(as listed below). <u>Bukit Leelau Certification Unit</u> Bukit Leelau Estate Detas Estate Merchong Estate Mekassar Estate Laukin A Estate <u>IOI Sister Estates</u> Leepang A Estate
3.8.2	Mass balance Module A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A	Yes	NA this Mill IP

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3 rd party certified supply base.		
3.8.3	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.	Yes	As in provided in the body text.
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).	Yes	<p>Member Name Member Name: Perusahaan Mekassar (M) Sdn Bhd - Bukit Leelau Palm Oil Mill Holding Name: IOI Commodity Trading Sdn Bhd GPS Coordinates (Latitude, Longitude): 3.30273, 103.137889</p> <p>License Information Commodity : Palm Oil Type of Business : Oil mill License Status : Active (19-02-2022 - 18-11-2022) Supply Chain Model : Identity Preserved</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.5	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> • 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	<p>BLPOM have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model (IP) as per below:</p> <ul style="list-style-type: none"> - CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouse & Trading Companies <ul style="list-style-type: none"> i) Purpose ii) Scope iii) Supply Chain Model and Requirements iv) Responsibilities v) Procedure detail <ul style="list-style-type: none"> - Internal Audit - Handling Complaints - Handling Non Conformities - Handling RSPO Products - Downgrading and Mass balance Traceability - Ensuring Segregation for New RSPO Certified Mill. - RSPO Supply Chain – Module D – CPO Mills: Identity Preserve (IP) Purpose <ol style="list-style-type: none"> 1. Scope 2. Responsibilities 3. Reception of Raw Material 4. Processing & Storage 5. Dispatch of Mill Produce 6. Records and Retention 7. Training 8. Claims 9. Overproduction 10. Handling Complaints 11. Non Conformities Product 12. Reference 13. List of Amendment 14. Attachment <p>Complete and up to date records and reports that demonstrate compliance with the supply chain model has been verified and training has been provided to PIC such as AP, watchman, grader, lab attendant, weighbridge operator, lab supervisor, and sustainability clerk for to create awareness and increase understanding on supply chain requirement. Latest training has been carried out in June 2022 for critical control point and on 04/08/2022 for External Stakeholder/contractor (transporter) training has been conducted by assistant mill engineer.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.6	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> • Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. • Effectively implements and maintains the standard requirements within its organisation. • Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non- conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports. 	Yes	<p>Audit report has also been established “2022 RSPO Cahain of Custody & supply chain certification Internal Audit report”. The audit was conducted against the RSPO Supply Chain Certification Standard.</p> <p>Coverage of audit sufficient to cater for the new standard (including modular requirement; Module D - CPO Mills: IP). Internal audit conducted on date 25/07/2022 lead by the internal appointed auditor. No NCR & OFI has been issued by internal audit.</p> <p>The outcome of the internal audit had been reviewed accordingly by the management during management review dated on 02/08/2022 and some of issues has been discussed are:</p> <ol style="list-style-type: none"> a) Welcoming speech by regional manager b) Updates on RSPO & MSPO standard requirement c) Discussion on internal & external audit report d) Performance review & customer feedbacks e) Status of correction and corrective action f) Follow up action from previous management review g) Continuous improvement aspects h) Complaint and grievances i) Resources need and training j) Roundtable assessment of additional issues and discussion on the action plan k) Other matters

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.7	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	Yes	<p>BLPOM had continued to receive certified FFBs from the CU's own supply bases as well as certified FFBs from IOI Sister estate. There were 5 supply bases (estates) sending certified FFBs to BLPOM. They were Bukit Leelau Estate, Detas Estate, Merchong Estate, Mekassar Estate, and Laukin A Estate (own estates) and sister Estate Leepang A Estate. The validity of the certificate of the supplier has been checked accordingly. Among the information available on the FFB consignment note are estate name, delivery date, no of FFB bunches, FFB weight, quantity, unique identification number. Monitoring records titled as <i>"ISCC & RSPO / CSPO production monthly movement"</i> has recorded the tonnage of certified FFB and its supplying estate.</p> <p>There was no overproduction at Bukit Leelau Certification Unit. Total last year certified volumes and last year actual sold as per table below:</p> <p>Procedure for handling non-conforming products has established in the CSFFB, CSPO & CSPK Traceability System for Estates, Mills, Warehouse & Trading Companies.</p> <ul style="list-style-type: none"> • Procedure detail <ul style="list-style-type: none"> - Handling Complaints - Handling Non Conformities <p>Latest training has been carried out on 04/08/2022 for External Stakeholder/contractor training has been conducted by assistant mill engineer</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single-documents or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documentation and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of buyer; b) The name and address of the seller c) The leading or shipment/delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation i) A unique identification number 	Yes	<p>Documented procedures related to sales and goods out were sighted and found adequate. The requirement of sales & goods out especially on notation of applicable Supply Chain model & Certificate number being complied by indicating in weighbridge dispatch ticket.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.9	<p>Outsourcing Activities</p> <p>(i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification.</p> <p>(ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.</p>	Yes	<p>BLPOM outsource transportation certified product prior to delivery to end buyer.</p> <p>For delivery of PK, the lorry being chartered by buyer.</p> <p>The training also has been carried out for transporter in Apr 2022 by Assistant Mill Engineer.</p> <p>Inspection was carried out as additional effort to ensure no contamination sighted i.e. "Pemeriksaan CSPK". List of contact person for both transporters were made available and up to date in the List of Stakeholder.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.10	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	Yes	List of contact person for both transporters were made available and up to date in the List of Stakeholder.
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	Yes	No new contractors used and will be used in the future for the processing or production of RSPO certified materials.
3.8.12	The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	Yes	Sighted CPO and PK delivery note, weighbridge ticket, production data, internal audit and management review records were found up-to-date.
	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	Yes	All records related to RSPO SC were maintained minimum for 2 years. Sample CPO dispatch note since Jan 2019 until to date was available and well maintained.
	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	Identity Preserved Module, the mill has recorded and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis
	iv) For Mass Balance Module, the mill: a. shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b. All volumes of certified CPO and PK that are delivered are deducted from the material	Yes	Not Applicable since this is IP POM

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>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	<p>BLPOM process all the received certified crop & their processing output will be based on their actual Oil Extraction Rate (OER) as well as Kernel Extraction Rate (KER).</p> <p>These figures were monitored on daily & monthly basis by the mill using the prepared template (e.g. SUMMARY REPORT -ISCC & RSPO/CSPO PRODUCTION MONTHLY MOVEMENT) to ensure their accuracy as well as monitoring of their ongoing performance.</p>
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	Yes	
3.8.15	<p>Processing</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 products, including during transport and storage to strive for 100% separation.</p>	Yes	<p>Marketing department responsible for the purchase and sell of raw material and finished product respectively. Relevant information will be provided to BLPOM for reference on site.</p> <p>The dispatch of the RSPO certified CPO/ PK to buyer by BLPOM were made based on agreement, as per noted in sales contract.</p> <p>The receiving pit, pipelines and tanks in BLPOM were thoroughly cleaned, swept and flushed before RSPO certified CPO was pumped in to avoid contamination. Dedicated tanks were used to store RSPO certified CPO from BLPOM. The same practice occurs for separate handling of certified palm kernel.</p> <p>For traceability of a specific batch of RSPO certified CPO back to the supplying POM, BLPOM kept the relevant documents such as the weighbridge ticket, CPO dispatch note, Dispatch oil quality ticket, Authorization from transporter, Borang MPOB L3, CPO dispatch authorization were issued by the POM.</p>

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Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
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>The registration of transaction is being carried out by Marketing Department subordinate using the :</p> <p>Mill receives copy of transaction input to the system on monthly basis based on contract summary (buyer weight being put in).</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	<p>Relevant information on product claim (including applicable Supply Chain model and certificate number) is being correctly indicated in the relevant outgoing paperwork. BLPOM has not use RSPO corporate logo as well as trademark logo.</p>

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Principle 4: Respect community and human rights and deliver benefits

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

Clause	Indicators	Comply Yes/No	Findings
4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	Yes	A Sustainable Palm Oil Policy which was made available during this surveillance audit. Among the commitments contained in the Policy include the commitment for human rights. A policy to respect human rights was included in the clause on prohibiting retaliation against Human Rights Defenders. Briefings on the Policy were given during stakeholder meetings conducted.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	Yes	Based on records sighted and interviews conducted with workers and local communities, as well as security personnel, there was no evidence of Bukit Leelau CU instigate violence or use any form of harassment in the operations.
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	Bukit Leelau CU complies with the Company's Standard Operating Procedure known as "Grievance Procedure". The procedure includes the mechanism of receiving, recording and addressing any complaints/grievance from affected parties. Among the complaints and grievance channels include filling up the complaints form, Green Book, and Whistleblowing. IOI has also created a mobile phone apps where complainants can complaint via Google apps. This latest innovation is currently still being tested and not yet fully implemented. With regards of ensuring anonymity of complainants or whistle-blowers, IOI has its 'Whistle-blowing Policy' revised October 2019 which ensures anonymity and protects whistleblowers against reprisals or intimidation.
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	Yes	The documented system in dealing with complaints and grievances are briefed during muster briefing. For those who are illiterate or foreign workers who cannot understand Bahasa Malaysia or English, their respective representatives would be providing the necessary translations. This was confirmed by the worker representatives during audit interviews at all operating units. Briefing on grievance mechanism and the related procedures were briefed as follows to all workers (male and female) comprising mandores, manurers, harvesters, sprayers, gardeners, watchmen, drivers, general workers.

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Clause	Indicators	Comply Yes/No	Findings
	4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	Yes	Evidence was available that parties to a grievance are kept aware of the progress of their complaints.
	4.2.4 The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	Yes	The procedure on Handling Social Issues states that legal proceedings may follow if there is a failure of negotiation process involving estate management, representatives from the disputed parties, zone heads, third parties and stakeholders.
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	Bukit Leelau CU's significant contributions to the local development include employment opportunities to the local community. Bukit Leelau CU is also undertaken a project in collaboration with Global Environment Centre and government agencies known as Mini Landscape Plan for Peatlands Adjacent to Bukit Leelau Estate, Pahang where degraded areas will be rehabilitated. Once the area is re-wetted, planting activities of 5 ha each will be undertaken equally by IOI Plantation and the local communities who would be able to reap long-term benefits from the rehabilitated peatland. The commitment declared by IOI Plantation had been completed in 2019. Some of the CSRs provided by Bukit Leelau CU were as follows: Financial contribution for Hari Raya and Hari Guru, Temple donation, Blood Donation, Bridge to Orang Asli village and Sports Day.
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	Bukit Leelau CU owned the land as it was leased and bought from the previous landowner which is Pahang State government and KBDYMM Sultan Pahang since 1976 - 2001. Based on the interviews held with local communities from Kg Kundang, Kg Runchang (RPS), Kg Sawah Batu, Kg Tanjung Kelapa; with representatives from neighbouring estates i.e. FELDA Lepar 5, Ladang Ibam, FELCRA, Prominent Teamwork Estate and Ah Chai Estate (smallholder), it was confirmed that there is no case concerning the rights of local communities and indigenous peoples. The Bukit Leelau POM premises are located within Bukit Leelau Estate land title (20.35ha). The land titles are issued under the names of Perusahaan Mekassar (M) Sdn Bhd, and the land title specifies land use to be for oil palm. All the visited operating units have the copies of their land titles kept at their administration office. The certified area (ha) for Detas Estate has been expanded to 2300.6876 ha with the addition of 74.92 ha following the result of verification and resolution of the boundary dispute between IOA Plantation and FGV Lepar Hilir 5 Estate (at Field PM 97F). Ensuing field verification using the located JUPEM Boundary stone as reference, both parties agreed on the delineation of the

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Clause	Indicators	Comply Yes/No	Findings
			corrected boundary on 5/2/2020.
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	Yes	As reported in 4.4.1 of these checklists, it has been verified that the land is now legitimately owned by Bukit Leelau CU since 1976 - 2001. The audit team had confirmed that there were no land issues related to previous owners. The audit team has also interviewed relevant stakeholders and from the interviews, it can be concluded that there was no evidence of any land dispute at Bukit Leelau CU.
	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	
	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	

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Clause	Indicators	Comply Yes/No	Findings
	4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Bukit Leelau CU since 1976 - 2001. All the related documentation regarding the land acquisition was kept in IOI Plantations HQ Office, Putrajaya and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estates. Maps of an appropriate scale showing the extent of recognized legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities are therefore not applicable.
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	Yes	This requirement in this indicator does not apply to Bukit Leelau CU.
	4.4.5 (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	Yes	This requirement in this indicator does not apply to Bukit Leelau CU.
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	Yes	This requirement in this indicator does not apply to Bukit Leelau CU.
4.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system	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 Bukit Leelau CU and land title, there was no new plantings are established on local peoples' land. It has been verified that the land is now legitimately owned by Bukit Leelau CU since 1976 - 2001. The audit team had confirmed that there were no land issues related to previous owners. The audit team has also interviewed relevant stakeholders and from the interviews, it can be concluded that there was no evidence of any land dispute at Bukit Leelau CU.
	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Bukit Leelau CU since 1976 - 2001. All the related documentation regarding the land acquisition was kept in IOI Plantations HQ Office, Putrajaya and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. The audit team has also interviewed relevant stakeholders and from the interviews, it can be concluded that there was no evidence of any land dispute at Bukit Leelau CU.

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Clause	Indicators	Comply Yes/No	Findings
that enables these and other stakeholders to express their views through their own representative institutions.	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.		
	4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Bukit Leelau CU since 1976 - 2001. All the related documentation regarding the land acquisition was kept in IOI Plantations HQ Office, Putrajaya and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. The audit team has also interviewed relevant stakeholders and from the interviews, it can be concluded that there was no evidence of any land dispute at Bukit Leelau CU.
	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 Bukit Leelau CU since 1976 - 2001. All the related documentation regarding the land acquisition was kept in IOI Plantations HQ Office, Putrajaya and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighboring estate. The audit team has also interviewed relevant stakeholders and from the interviews, it can be concluded that there was no evidence of any land dispute at Bukit Leelau CU. FPIC process is not applicable.
	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	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Bukit Leelau CU since 1976 - 2001. All the related documentation regarding the land acquisition was kept in IOI Plantations HQ Office, Putrajaya and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. The audit team has also interviewed relevant stakeholders and from the interviews, it can

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Clause	Indicators	Comply Yes/No	Findings
	independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.		be concluded that there was no evidence of any land dispute at Bukit Leelau CU.
	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 Bukit Leelau CU since 1976 - 2001. No issue on any land dispute at Bukit Leelau CU.
	4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	Yes	There were no new lands acquired for plantation and mills after 15/11/2018. The current operation area including mill and estates as per stated in the land title.
4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with thru a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative 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	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the "Grievance Procedure for landowner issues", the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the IOI Plantations Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	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 "Grievance Procedure for landowner issues", 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.
	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 IOI Bukit Leelau CU. The Fresh Fruit Bunches are supplied from IOI Plantations owned estates which are certified to RSPO.

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Clause	Indicators	Comply Yes/No	Findings
	4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	Yes	There was no process and outcomes of any negotiated agreements, compensation and payments to any affected parties.
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	Yes	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the "Grievance Procedure for landowner issues", the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the IOI Plantations Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	Yes	There was no issue regarding compensation (monetary or otherwise) with villagers, local community and neighboring estate.
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Bukit Leelau CU since 1976 - 2001. All the related documentation regarding the land acquisition was kept in IOI Plantations HQ Office, Putrajaya and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
4.8 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 reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by Bukit Leelau CU since 1976 - 2001. All the related documentation regarding the land acquisition was kept in IOI Plantations HQ Office, Putrajaya and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable	Yes	Land conflict is not present in the area of the unit of certification.

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Clause	Indicators	Comply Yes/No	Findings
	conflict resolution processes 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.		
	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.	Yes	There was no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations.
	4.8.4 For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighboring communities where applicable).	Yes	There was no conflict or dispute over the land.

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	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	Yes	This CU is certified under the Identity Preserved supply chain model. Hence, the POM is not accepting any outsiders FFB from smallholders or another private plantation. Therefore, the mill is not required to display current and past prices for FFB.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Yes	No outsider FFB supplies are received from smallholders at IOI Bukit Leelau CU as this mill is Identity Preserved mill, and therefore this Indicator is not applicable.

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Clause	Indicators	Comply Yes/No	Findings
(Independent and Scheme) and other local businesses.	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Yes	In Bukit Leelau POM Price for FFB adopted the MPOB Pricing. All prices are calculated by the MPOB and the mill take the price and follow what MPOB guided. No outsider FFB supplies are received from smallholders at IOI Bukit Leelau CU as this mill is Identity Preserved mill, and therefore this Indicator is not applicable.
	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	So far, there was no third-party FFBs sent to the mill.
	5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe.	Yes	All Estates in Bukit Leelau CU including Laukin A Estate doesn't have any smallholders sent the FFB to them and they currently did not act as dealer or collection centre, so they did not have any agreement with the smallholders. Hence, availability of fair, legal and transparent contracts having an agreed timeframe is not applicable.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	Yes	Interviews conducted with contractors and suppliers representatives had confirmed their understanding of their rights and obligations under the contract. Both contractors confirmed the fairness of the terms of their contract, and payments are usually received within 7 to 10 days of invoice issuance.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	Yes	Weighing Equipment in IOI Bukit Leelau POM (shared with Bukit Leelau Estate) and other estates were calibrated by yearly basis using accredited weighing company Metrology Corporation Malaysia Sdn Bhd.
	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	IOI Plantations Berhad 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. However, in Bukit Leelau CU, Fresh Fruit Bunches are supplied from Boustead owned estates which are certified to RSPO. There is no third-party FFB sent to the mill. Noted that invitation was made to the stakeholders to promote on RSPO certification. However, some smallholder is willing to go for MSPO only and don't want to certify under RSPO due to financial restriction.
	5.1.9 (C) The unit of certification has a grievance mechanism for smallholders	Yes	The CU also has developed a Standard Operating Procedure (SOP) on Stakeholder Consultation (Stakeholder Request Procedure', 'Grievances Reporting Flow Chart' and

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Clause	Indicators	Comply Yes/No	Findings
	and all grievances raised are dealt with in a timely manner.		'Grievance Procedure for Landowner Issues'). It contains procedures for consultation and discussions, solving issues/grievances, records and improvements, which is the responsibility of the Manager and Assistant Manager. It also stipulates that issues and grievances can be raised via comments, complaints, or request for information, and that all issues are to be resolved fairly and within the stipulated timeframe. The SOP also states that Master List of Documents must be available for stakeholders' reference. This SOP are being exhibited at the office notice boards at muster grounds. 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	For Bukit Leelau POM, being an Identity Preserved Mill, Bukit Leelau POM does not purchase FFB from smallholders, and no smallholders are in Bukit Leelau CU supply base. Therefore, this indicator is not applicable.
	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	For Bukit Leelau POM, being an Identity Preserved Mill, Bukit Leelau POM does not purchase FFB from smallholders, and no smallholders are in Bukit Leelau CU supply base. Therefore, this indicator is not applicable.
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	Yes	For Bukit Leelau POM, being an Identity Preserved Mill, Bukit Leelau POM does not purchase FFB from smallholders, and no smallholders are in Bukit Leelau CU supply base. Therefore, this indicator is not applicable.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	Yes	For Bukit Leelau POM, being an Identity Preserved Mill, Bukit Leelau POM does not purchase FFB from smallholders, and no smallholders are in Bukit Leelau CU supply base. Therefore, this indicator is not applicable.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	Yes	For Bukit Leelau POM, being an Identity Preserved Mill, Bukit Leelau POM does not purchase FFB from smallholders, and no smallholders are in Bukit Leelau CU supply base. Therefore, this indicator is not applicable.

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Principle 6: Respect workers' rights and conditions

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

Clause	Indicators	Comply Yes/No	Findings
6.1 Any form of discrimination is prohibited.	6.1.1 (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	Yes	A Policy entitled Equal Opportunity Employment and Freedom of Association Policies is available. This Policy is displayed at the main notice boards and at the workers' housing. The Policy states that there will be no discrimination based on race, national origin, religion, gender, union membership and age.
	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	Audit interviews held with various workers (male/female and foreign/local) as well as local communities confirmed that they have not been discriminated against. The Company does not charge any recruitment fee, and this was verified that recruitment fee paid by newly arrived Nepali workers were duly reimbursed.
	6.1.3 The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	Yes	All units within Bukit Leelau CU were able to demonstrate that the recruitment selection, hiring and access to training were based on skills, capabilities and medical fitness. Verified during this surveillance that each job applicant would fill up a job application form attaching copies of NRIC, qualification and previous work experience. The Manager then assessed their respective suitability to the job vacancy and recorded this in the application form. The workers also attended an orientation and induction training to familiarize them with their work in IOI.
	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	All operating units within Bukit Leelau CU were able to demonstrate that no discriminatory pregnancy testing was conducted. Since there are no female workers involved in spraying and manuring work, pregnancy tests are conducted voluntarily and only with the workers' consent.
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	Yes	A Gender Committee known as Women's Empowerment Committee is in place within all operating units of Bukit Leelau CU. Interviews conducted with the WEC committee members confirmed their understanding of WEC's purpose. These include raising awareness on sexual harassment, domestic violence, reproductive rights, complaint mechanisms, and to identify and address issues of concern to the members. Members of the WEC are all female employees and male employees' spouses who are non-employees. Interviews held with workers confirmed their understanding of what constitutes sexual harassment, how complaints are lodged, and who to complaint to.

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Clause	Indicators	Comply Yes/No	Findings
	6.1.6 There is evidence of equal pay for the same work scope.	Yes	All units within Bukit Leelau CU were able to demonstrate evidence of equal pay for the same work scope. Sampled payslips and employment contracts of the following workers showed that equal pay is being paid for the same work scope.
6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).	6.2.1 (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.	Yes	Documentation of pay are available in the form of monthly pay slips, and conditions of pay are contained in employment contracts and letters of employment offer. Both these documents are provided to the workers for their record and safekeeping. Foreign workers signed employment contracts that have been provided to them in their mother tongue, namely in Hindi, Bengali, Burmese, Nepalese, Bahasa Malaysia and English. Workers interviewed confirmed that briefings were given prior to signing the employment contracts. Records were also available of the training sessions given. All the briefings were done in Bahasa Malaysia. For foreign workers not conversant in Bahasa Malaysia, their respective worker representatives assisted in providing the necessary translation. The worker representatives were interviewed during the audit, and they confirmed this. The affected workers were also interviewed and confirmed their understanding.
	6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.	No	<p>Employment contracts for all checkroll workers of Bukit Leelau CU, clearly detail out payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, public holiday entitlement, annual leave entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements).</p> <p>Payroll documents, namely the monthly pay slips give accurate information on compensation for all work performed. The payslip contains details of work done (daily rated/piece-rated, allowances, work on rest days, overtime payment, leave taken, medical leave taken, total number of days offered, total number of days worked, deductions, net pay. None of the checkroll workers have any family members assisting them.</p> <p>However, a review of payroll documents for workers of Transport Contractors (Sasaran Perentas and Pengangkutan Teo Tuan Kwee Sdn Bhd at Bukit Leelau CU found information on compensation/renumeration not adequate/detailed in the salary slips. This was evidenced by the verified Salary Slips for Johar bin Omar (employee of Sasaran Perentas at Ladang Merchong and Bukit Leelau POM) and M. Jayan a/l Machap (employee of Teo Tuan Kwee SB) at Bukit Leelau POM did not have the following statement and detail:</p> <ol style="list-style-type: none"> 1. Statement of output (tonnage of FFB/Oil) recorded for the workers 2. Statement on the calculation of wages not detailed (i.e. Percentage X Output X FFB/oil Prices) 3. Prevailing prices of product transported at the time of calculation not provided <p>Hence, a Major NCR (ISMA 01/22) against Indicator 6.2.2 is therefore raised.</p>

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Clause	Indicators	Comply Yes/No	Findings
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	Yes	Based on interviews and review of workers' attendance records, it was verified during the surveillance audit that workers observe regular working hours including overtime hours within the legal confines of the Employment Act 1955. They are also entitled to at least 30 minutes' rest after 5 hours of work. Paid sick leave is given for workers who have been certified unwell by a medical practitioner including estate health assistants. Female workers receive 3 months paid maternity leave. There is no evidence of dismissal, and so compliance with reasons for dismissal and period of notice could not be verified during this audit. Salary deductions are made for statutory deductions such as SOCSO, EPF, and EIS. For non-statutory deductions such as for payment of electricity and water bills, records are available of written permits from the Department of Labour, Peninsular Malaysia. Also sighted during the audit were workers' consent to deduct their salaries for electricity and water.
	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	Based on site visit during the audit, review of records and interviews, all operating units within the Bukit Leelau CU were able to demonstrate that all workers who chose to stay at the workers' housing receive adequate housing with sanitation facilities, water supplies, electricity, medical and welfare amenities. These included football field, futsal and volleyball courts, sundry shops, estate clinics, places of worship, free and unlimited filtered water for their daily consumption. A van is allocated to ferry workers should they require hospital treatment. In general, the workers' houses are well kept and maintained, and generally in a good state of repair and painted to present a satisfactory appearance. Some units are left unoccupied for upgrading works.
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	Yes	All operating units within Bukit Leelau CU were able to demonstrate that efforts have been made to improve workers' access to adequate, sufficient and affordable food. This included: <ul style="list-style-type: none"> a. Allowing sundry shops and food canteens to operate near the workers' housing; b. Making price comparisons between items sold at the estate sundry shops and those sold at the nearest town; c. Providing van to transport workers to the nearest town (Muadzam Shah) during pay day to enable them to do grocery shopping; d. Meeting regularly with the food canteen and sundry shop owners to ensure adequate supply of food at reasonable prices. Visits made to the food canteens and sundry shops confirmed that necessities such as cooking oil, flour, rice, coffee, tea, sugar, eggs, frozen fish and meat were sold, and prices displayed.

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Clause	Indicators	Comply Yes/No	Findings
	<p>6.2.6 A “DLW” is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a “decent living wage” is in place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following:</p> <ul style="list-style-type: none"> • An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers. • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment. • The unit of certification may choose to implement the “living wage” payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before 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>	<p>Yes</p>	<p>IOI Peninsular has identified DLW based on the recommendations of its consultants from Monash University. With the help of the said consultant, IOI has included items such as food, housing, non-food non-housing items, unexpected events, FTE and mandatory statutory deductions. For all its estates in Pahang, which includes all units under Bukit Leelau CU, the calculation is:</p> <p>Gross DLW: RM1,577.13 per month. Net DLW: RM1,395.69 per month.</p>

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Clause	Indicators	Comply Yes/No	Findings
	6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	Yes	All the estates and mill employ full-time employees. There is no casual, temporary and day labour engagement at all operating units within Bukit Leelau CU.
6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	6.3.1 (C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.	Yes	The published statement recognising freedom of association is available in the Company's Equal Opportunity and Freedom of Association Policy dated October 2017 signed by the Plantation Director. This was explained to all workers during Policy trainings conducted at all estates.
	6.3.2 Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.	Yes	Workers from each nationality can freely choose their own representatives via an election process. These elected representatives will attend regular Joint Consultative Committee (JCC) meetings with the management where issues raised by the workers are discussed and addressed. Minutes of the JCC meetings were drafted in Bahasa Malaysia and made available during the audit. Among the issues discussed involved housing issues, safety, delay in passport issuance by the Bangladeshi High Commissioner, etc.
	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 was available that all workers were able to nominate and elect their representatives freely without the interference from the management.
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	The Policy for the protection of children, including the prohibition against child labour is available in IOI's Sustainable Palm Oil Policy. This Policy also pledges to eliminate all forms of child labour. It is also included in all service contracts with contractors and suppliers.
	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	Yes	Based on interviews, documentation review and observations in the field, evidence is available that minimum age requirements of 18 years old are met throughout Bukit Leelau CU. Personnel files contain copies of the workers' NRIC (for Malaysians) and passports (for non-Malaysians). These documents were used to screen age of the workers when they applied for the job.

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Clause	Indicators	Comply Yes/No	Findings
	verification procedure.		
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	Yes	There was no evidence that any young persons were employed in any of the units at Bukit Leelau CU as evidenced from documentation review, field observations and interviews.
	6.4.4 The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	Yes	Based on the documents sighted, communication about its no child labour Policy was communicated to all levels of employees during training. Interview with local workers also confirmed their understanding that they are not allowed to bring their children to assist with work in the field.
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	All units within Bukit Leelau CU were able to demonstrate that all sampled workers have entered into employment voluntarily. All workers (general workers, harvesters, sprayers, manurers, etc), have not been subjected to contract substitution and no discriminatory practices against foreign workers was observed.
	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 is contained in IOI's Sustainable Palm Oil Policy signed by the Group Managing Director/Chief Executive Officer and Group Head of Sustainability. This Policy is being implemented based on interviews held with women employees who are not prohibited from planning their families, are entitled to 3 months paid maternity leave, and women employees who are exposed to chemicals would be re-assigned to another job once she is confirmed pregnant.
	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	Evidence was available that needs of new mothers were assessed. Sampled during the audit were assessment form of a new mother at Bukit Leelau Mill carried out in Oct 2021. Among the needs assessed were baby nursing needs, immunisation appointments and transport requirements, etc.
	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 Grievance Procedure has been established. Para 4, the procedure states that the company commits to safeguarding all stakeholders involved in the grievance process against potential threats, intimidation, violence or reprisals. Furthermore, the grievance mechanism support with Whistleblowing Policy revised on October 2019. Para 4.0 stated that the complainants may choose to remain anonymous when reporting on the particular grievance. Implementation of the procedure was seen in the various grievance channels available to all affected parties, including workers and external stakeholders. This includes the use of Green Books, Hotlines, and complaints to the sustainability department. The most recent is IOI Mesra where complainants can lodge complaints online using mobile phones. IOI Mesra is still in its early stages of implementation and has

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Clause	Indicators	Comply Yes/No	Findings
			not been officially launched yet.
6.6 No forms of forced or trafficked labour are used.	6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited: <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty to the workers for termination of employment • Debt bondage • Withholding of wages 	Yes	All units within Bukit Leelau CU were able to demonstrate that all sampled workers have entered into employment voluntarily. All workers (general workers, harvesters, sprayers, manurers, etc), have not been subjected to contract substitution and no discriminatory practices against foreign workers was observed.
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	No	During the audit, it was found that The Company's existing SOP on MY EG Foreign Worker Permit Renewal has not been comprehensively established. It does take not into account variations to the normal procedures in permit and passport renewals of foreign workers. This has resulted in the following workers' permits not being renewed within the stipulated timeframe. Therefore, Major Non-Compliance No. RZ02 of 2022 was issued.
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	Estate / Mill Managers were appointed as responsible person(s) for safety and health issues and also chairman for OSH Committee. The Manager subsequently assigned duties of OSH coordinator to the Assistants or healthcare assistant for the down line implementation of OSH practices in the estate and mill. All identified Executives were officially given a letter for such an appointment. Records of regular meetings between the responsible person and workers to discuss about health and safety had been verified to the satisfactory maintained. Occupational Safety Health (OSH) Committee has been established together. The OSH committee organization chart for 2021 was available. The Estate/Mill Manager is the chairman and the Mill Engineer/Assistant Manager is the secretary. OSH Committee meetings were held once in three months.
	6.7.2 Accident and emergency procedures are in place and instructions are clearly	Yes	Emergency Response Plan (ERP) was established. Copies of procedures and telephone numbers were sighted on notice boards and muster grounds. Accident and emergency procedures for inhale of a highly toxic pesticides was available and updated at all estates

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Clause	Indicators	Comply Yes/No	Findings
	<p>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.</p>		<p>has been samples. Random interview with the estate workers showed that they were aware of accident and emergency procedures. Telephone numbers and names of the members of the Emergency Response Team (ERT) were communicated to all employees and displayed at notice boards. Telephone numbers of the PIC, Police Station, Fire Brigade, and <i>Klinik Kesihatan</i> were also included. Site inspection at weeding operation, harvesting operation, workshop, chemical & fertilizers store for all estates and mill noted on evidence that first aid kit is available at all works place with complete contents and no medication with expired date. The stock of first aid box is regularly check and refill, when necessary, by HA. Accident statistics were being maintained in a satisfactory manner and periodically reviewed. Accident/injury record were recorded using Lost Time Accident Frequently Rate (AFR) by monthly basis. Quarterly review on accident cases had been carried out during quarterly OSH committee meeting.</p>
	<p>6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>Yes</p>	<p>All staff and workers such as the storekeepers, harvesters and sprayers/manurers were continuously trained in safe working practices including SOP for PPE related to their job function. Appropriate PPE were given to workers based on HIRARC and SaOP recommendations suitable for the job position or hazardous operation undertaken. This was verified in the PPE issuance records viewed. During site visit at harvesting operation, circle spraying operation and manuring operation for all estates, sighted they were seen to wearing PPE such as face masks respirators, goggles, rubber boots, nitrile/cotton gloves, apron and hard hat, to cover all potentially hazardous operations. The condition of each PPE item and their validity lifespan were found good. Interview of workers showed they know when to change to a new set, either by expiry date or when they are damaged or rendered ineffective to use. Sanitation facilities for those applying pesticides was available near to chemical store area, after completed spraying activities, the workers will change out of PPE, wash and put on their personal clothing at the area. Meanwhile, during site inspection estate and mill workshop, most of the moving part and rotating machinery were installed with machine guarding and properly covered. Noted also the set of oxygen and acetylene cylinders in the workshop available with "flash back arrestors".</p>
	<p>6.7.4 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p>	<p>Yes</p>	<p>Medical care and accident insurance is provided to all employees, both Local and Foreign workers under Employees' Social Security Act 1969 (Act 4). Sighted the last three months' payment made to SOCSO on Form 8A for foreign and local workers was available for reviewed.</p>
	<p>6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p>	<p>Yes</p>	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics. The CU has maintained and updated the LTA Summary by monthly basis.</p>

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

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

Clause	Indicators	Comply Yes/No	Findings
7.1 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.	7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control.	Yes	Bukit Leelau CU continued to have a documented integrated pest management (IPM) system in place at all estates. The IPM program among others included pest management of rats, bagworms, nettle caterpillars, <i>Rhinoceros beetles</i> and wild boar. The IPM technique for rats included rearing barn owls (<i>Tyto alba</i>), bagworm control included the planting of beneficial plants such as <i>Cassia cobanensis</i> , <i>Antigonan leptopus</i> and <i>Turnera sublate</i> . The implementation was monitored by rat damage, bag worm attack, barn owl population census and records on planting beneficial plants. Though all estate had barn owls, rat damage still existed. Rat attack was treated/controlled by rat baiting using the active ingredient (a.i) <i>broadifacoum</i> . Application was on campaign basis – 2 campaigns per year. Baiting was stopped when bait acceptance drops to 20%.
	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	Bukit Leelau CU had a Zero Burning Policy and signed by Plantation Director. It amplifies IOI's commitment towards zero burning practices across their estates. The policy advocated compliance to the Malaysian Environment Quality Act 1974 (EQA 1974) and ASEAN Policy on Zero Burning 2003. As advocated, all estates visited, practised Zero burning. There was evidence of use of fire for pest control. Furthermore, there had been no serious outbreak of pest attacks on all estates.
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.	Yes	Justification of all pesticides used had been documented in Standard Operating Procedure on Sustainability. The use of selective products that are specific to the targeted weed had been demonstrated in the <ul style="list-style-type: none"> • Group Standard Operating Procedure (StOPs) for Estate Operations Index 9.1 item 7 (Appendix 1 and 2), • Section 6 of Oil Palm Agricultural Policy (OPAP) manual. • The latest established document was Doc: SOP 4.6, Appendix 3.0 Rev 1A Effective 01/01/2019 Justification of Chemicals Commonly Used in IOI Plantations in the SOP on Sustainability Document. • Register of Chemicals Hazardous to Health for mill and all estates sampled.
	7.2.2 (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active	Yes	All estates continued to maintain records on the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, and Ai/Ha. Pesticides are used only when justified and areas used are recorded in bin

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Clause	Indicators	Comply Yes/No	Findings
	ingredients applied per ha and number of applications) are provided.		cards, program sheets, chemical register, cost books and in progress reports.
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	Yes	Bukit Leelau CU continued to have a Pesticide Reduction Plan and Chemical & Fertilizer Reduction Plan. The estates continued to plant nectariferous beneficial plants (<i>Cassia cobanensis</i> , <i>Antigonan leptopus</i> and <i>Turnera sublata</i>) as part of the IPM plan. Nurseries were available for continuous planting in the estates to reduce use of insecticides on bagworms and for control of rats included rearing barn owls (<i>Tyto alba</i>). EFB was applied in single layers in order to prevent the breeding of Rhinoceros beetles. In flat and undulating areas where Oil Palm had been planted on un-terraced areas, harvesting paths were grass cut to control noxious weeds. Furthermore, spraying of weeds was carried out as economic program and control of other leaf using pesticides only when pest outbreak was above threshold levels.
	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 prophylactic use of pesticides observed in all visited estates.
	7.2.5 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:	Yes	At time of visit all estates only used pesticides that are officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision Pesticides Act 1974 (Act 149) (Section 53A); and in accordance with USECHH Regulations (2000). There was no evidence of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, had been used. The chemical store and chemical list indicated both estates had none of the chemicals. The use of paraquat was phased out in all IOI estates.
	7.2.5a Judgment of the threat and verify why this is a major threat.	Yes	All estates confined usage of pesticides which are were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000. a) The review of the chemical register concluded that all pesticides used were of class II, III & class IV. b) At time of visit There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions been used. On Merchong Estate the Class 1b chemical was last used in 2019 and since has be replaced with the Class II pesticide Acephate. c) Sighted from records and interviews with workers, staff and estate assistants, concluded that trainings were held with all precautions being taken and all legal requirements.
	7.2.5b Why there is no other alternative which can be used.	Yes	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	Yes	
	7.2.5d What is the process to limit the negative impacts of the application.	Yes	
	7.2.5e Estimation of the timescale of the application and steps taken to limit	Yes	

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Clause	Indicators	Comply Yes/No	Findings
	application to the specific outbreak.		
	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	The estates and mill have the Group Standard Operating Procedures (StOP) and Safe Operating Procedure (SaOP) for use of PPE during working. All workers involved in pesticide application were provided with appropriate PPE and replaced when damaged. PPE issue and replacements records were verified by the auditors. It was also observed that PPE was used by workers working in the fields. The estate and mill had a SOP for handling of chemical/pesticides. The employees involved in the chemical handling such as the storekeepers, sprayers, fertilizer and rat bait workers were trained in chemical handling and they understood the hazards of the chemicals and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to them through the SDS training. It was also noted that SDS are available at chemical and fertilizers during the audit. Training on pesticides/chemical handling was carried out regularly by the CU for knowledge about the activities.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	Yes	At all visited mill and estates the storage of pesticides was in accordance with recognized best practices. They were stored in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders and Pesticides Act 1974 (Act 149) and Regulations. A proper premixing area with eye wash facilities and bathing area is available near to the chemical stores. The wastewater from the washing of empty chemical containers and PPE, and chemical mixing was pumped to a storage tank for reuse in chemical mixing. This is to avoid any contamination of chemicals to the ground. Triple rinsing activities continued to be implemented for empty pesticide containers. The detailed procedure for this purpose is available in SOP for Scheduled Wastes Management and SOP for Triple Rinsing.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	Yes	Chemical containers (Scheduled waste) have been disposed through DOE approved contractor "Kualiti Alam Sdn Bhd".
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	Yes	Aerial spraying was not practiced in all estates and there was no evidence to show that any had been carried out.
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health	Yes	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. All workers involved with pesticides were sent to the clinic to confirm their health status whether they are FIT to work.

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Clause	Indicators	Comply Yes/No	Findings
	conditions, is demonstrated.		
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	Yes	All estates continued to comply with <i>Safety Work Procedure – Chemical Handling & Guidelines on Reproductive Health</i> , where no work with pesticides was given to pregnant or breast-feeding women. List of sprayers were maintained by all 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 disposed of in an environmentally and socially responsible manner.	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	Yes	Waste management plan has established in environmental management plan dated in July 2022. Among of identification of waste and action plan & monitoring has been carried out such as: <ul style="list-style-type: none"> • identification waste: diesel spillage action taken: construct bund, to place spill kits, regular maintenance of vehicles • Identification waste: chemical spillage action taken: bund and sump has been constructed to recollect all spillage which can be used for premixing chemical
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	Yes	Sighted approval letter from management of Tapak Perlupusan Sisa Pepejal Majlis Daerah Muadzam, Bukit Ibam – Greenviro Solutions Sdn Bhd to contractor Ms MIDO Enterprise for waste disposal at the area.
	7.3.3 The unit of certification does not use open fire for waste disposal.	Yes	During site visit there was no evidence of fire has been used for disposal of waste material. All waste material has been disposed through land fill area and “Tapak Perlupusan Sisa Pepejal- Jalan Muadzam - Bukit Ibam.”
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	Bukit Leelau CU continued to manage and improve soil fertility to a level that ensures optimal and sustained yield by monitoring the fertilizer inputs through annual fertilizer recommendations. Maintaining soil fertility is guided by its Group Standard Operating Procedures (StOP) Oct 2018. These SOPs are implemented and monitored. The monitoring of daily implementation of SOPs by estate workers is done by the field conductors, Estate Assistant Managers and Estate Managers. Periodic visits by the agronomists serve as an additional monitoring to ensure that the SOPs have been well implemented and correctly monitored by the estate management.
	7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	Yes	Periodic tissue/leaf and soil sampling were carried out in Bukit Leelau CU to monitor changes in the nutrient status of the palms. Annual tissue/leaf sampling for the nutrients N, P, K, Mg, Ca & B had been carried out in March-July 2022 for the estates and its results formed the basis for the fertilizers input recommendation to maintain and improve soil fertility. Soil sampling was carried out to check levels of the nutrients Organic C, N, Av P, K, Mg, Ca & CEC. The results of these samplings carried out in 2022 will form the basis for the fertilizers input recommendation to maintain and improve soil fertility for 2023.

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Clause	Indicators	Comply Yes/No	Findings																																				
			For all estates, agronomic assessment and fertiliser recommendation was conducted by the Agronomist of IOI Research Centre located in Gemencheh, Batang Melaka, Negeri Sembilan and they formulate the manuring programs and agronomic practices for oil palm yield and growth improvement. Soil maps were made available and reviewed by the auditors.																																				
	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	Bukit Leelau CU had a nutrient recycling strategy in place. Palm fronds were stacked in the inter row to decompose and Empty Fruit Bunches (EFB) application were given to replants, immature fields and young mature areas. Empty Fruit Bunch (EFB) and Solid Palm Oil Mill Effluent (POME) produced by the mill were applied in the field.																																				
	7.4.4 Records of fertiliser inputs are maintained.	Yes	Bukit Leelau CU continued to monitor their fertilizer inputs as recommended by their Agronomist of IOI Research Centre located in Gemencheh, Batang Melaka, Negeri Sembilan agronomist, who visited the estates during the annual tissue/leaf. Fertiliser application programs were monitored using records like manuring master plan, program sheets, bin cards, operational cost sheet, and manuring audits through Monitoring Record Fertilizer usage.. The main fertilizer recommended for 2022 for Detas, Mekassar, Merchong, and Bukit Leelau Estates were Compound 45B, NK Mixture (AS), NK Mixture (AC), Ammonium Sulphate (AS), Ammonium Chloride (AC), Muriate of Potash (MOP), Kieserite (KIE), Rock Phosphate (RP), Ground Magnesium Limestone (GML) and High-Grade Fertilizer Borate (HGFB). From the review of the records, it was noted that the actual fertilizer application for 2021 and 2022 was in line with the recommendation.																																				
7.5 Practices minimise and control erosion and degradation of soils.	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	Yes	<p>Based on the soils maps, there were no fragile/marginal soils in all estates visited. The soil maps came with description of the soils characteristics such as texture, depth, drainage, parent material and key aspect for management. The soil series were classified as follows:</p> <table border="1"> <thead> <tr> <th>Detas</th> <th>Merchong</th> <th>Mekassar</th> <th>Bukit Leelau</th> </tr> </thead> <tbody> <tr> <td>Batu Lapan</td> <td>Batang Merbau</td> <td>Batang Merbau</td> <td>Banar</td> </tr> <tr> <td>Bungor</td> <td>Bungor</td> <td>Bungor</td> <td>Bungor</td> </tr> <tr> <td>Champaka</td> <td>Cherang Hangus</td> <td>Cherang Hangus</td> <td>Erong</td> </tr> <tr> <td>Colluvium</td> <td>Gong Chenak</td> <td>Gajah Mati</td> <td>Gajah Mati</td> </tr> <tr> <td>Gajah Mati</td> <td>Jelutong</td> <td>Gong Chenak</td> <td>Harimau</td> </tr> <tr> <td>Kerayong</td> <td>Organic Clay</td> <td>Jelutong</td> <td>Jelutong</td> </tr> <tr> <td>Kuah/Batu Lapan</td> <td>Rengam</td> <td>Munchong</td> <td>Kampung Pusu</td> </tr> <tr> <td>Lintang</td> <td>Serdang</td> <td>Pelepah</td> <td>Kuala Brang</td> </tr> </tbody> </table>	Detas	Merchong	Mekassar	Bukit Leelau	Batu Lapan	Batang Merbau	Batang Merbau	Banar	Bungor	Bungor	Bungor	Bungor	Champaka	Cherang Hangus	Cherang Hangus	Erong	Colluvium	Gong Chenak	Gajah Mati	Gajah Mati	Gajah Mati	Jelutong	Gong Chenak	Harimau	Kerayong	Organic Clay	Jelutong	Jelutong	Kuah/Batu Lapan	Rengam	Munchong	Kampung Pusu	Lintang	Serdang	Pelepah	Kuala Brang
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Clause	Indicators	Comply Yes/No	Findings			
			Local Alluvium	Tai Tak	Rengam	Leelau
			Local Alluvium	Tai Tak	Rengam	Leelau
			Organic Clay		Serdang	Lunas
			Padang Besar		Tai Tak	Serdang
			Rasau		Terap	Nami
			SAN			Nangka
			Serdang			Rasau
	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	Bukit Leelau CU had a management strategy for planting on slopes and to minimise and control erosion and degradation of soils. It was observed that no replanting of any individual, contiguous area of steep terrain (greater than 25°) larger than 25 Ha in all the estates visited.			
	7.5.3 There is no new planting of oil palm on steep terrain.	Yes	Bukit Leelau CU had a management strategy for palm oil cultivation, taking into account the soil maps and surveys identifying marginal and fragile soils, including steep terrain for the palm oil long term suitability. The soil maps were provided and reviewed by the auditors it was observed that no fragile or marginal soils were found in Bukit Leelau 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	Bukit Leelau CU had a management strategy for palm oil cultivation in its estates taking into account the soil maps and surveys identifying marginal and fragile soils, including steep terrain for the palm oil long term suitability. The soil maps were provided and reviewed by the auditors it was observed that no fragile or marginal soils were found in all estates. Soil maps are taken into account in plans and operations of estates to ensure long term suitability of land for palm oil cultivation. Maps are used to identify areas that are inappropriate for planting such as slope maps to indicate steep terrain. There are no new plantings carried out in all the estates visited.			
	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	Soils maps prepared by GIS Department; IOI Research Centre unit shows that there are no fragile soils in Bukit Leelau CU.			
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	Yes	Bukit Leelau CU had a management strategy for palm oil cultivation, taking into account the soil surveys and topographic information in planning of drainage and irrigation systems, roads and other infrastructure. The soil map and topographic information were provided and reviewed by the auditors at the visited estates, which were updated digitally by IOI Research Centre, Gemencheh and used to address the planning of infrastructure in the field. Construction of drainage is evident at planted areas where water needs to be drained out especially at the terraces at the undulating areas and along the estate roads. Soil			

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Clause	Indicators	Comply Yes/No	Findings
			analysis and slope mapping have been used to guide the planning of drainage systems. Information obtained from soil analysis and slope mapping is taken into consideration when roads and infrastructure need to be developed. However, as all the estates in this unit of certification has been long established, there is rarely any new additional roads and drainages been developed. There are also no signs of soil erosion, and this was verified during the field visits.
7.7 No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	Yes	Bukit Leelau CU owned the land as it was leased and bought from the previous landowner which is Pahang State government and KBDYMM Sultan Pahang since 1976 - 2001. There are no expansion/new development area and/or crops conversion up to 2022. There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. Based on the soil maps prepared by GIS Department, IOI Research Centre revised in April 2020, only Bukit Leelau Estate having peat area planting at field PM98A which is 98.63 ha.
	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).	Yes	Areas of peat within the managed areas were inventoried, documented and reported to RSPO Secretariat. Evidence was sighted that the Report along with maps, etc. was sent to RSPO Secretariat on 22/07/2020 for Bukit Leelau Estate @ 89.63 ha. On the other hand, according to soil maps prepared by GIS Department, IOI Research Centre revised dated April 2020 at Bukit Leelau Estate, the peat soil planted was amended from 89.63 ha to 98.63 ha. During the audit process, Bukit Leelau Estate yet to update or report to the RSPO Secretariat.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	Yes	Bukit Leelau CU are managing peat area with proper facilities and equipment such as water weirs, water table, piezometer and subsidence pole. All of these facilities regularly monitored and reported on monthly basis.
	7.7.4 (C) A documented water and ground cover management programme is in place.	Yes	The water and ground cover management program is documented in Standard Operating Procedures For Management of Oil Palm On Peat Land (updated March 2020).- Water Management Of Oil Palm On Peat Land. The Bukit Leelau Estate used water level gauge/ruler in drains to monitor ground water levels. Records relating to water management were collected weekly.
	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	Yes	In order to have a smooth initiation of the Drainability assessment and avoid any misunderstanding during auditing the following transition arrangements have been agreed for the period 2019-2024. Starting 2019, all relevant RSPO member companies shall conduct an initial Drainability Assessment for all areas of oil palm on peat that are older than 15 years (and may therefore be expected to be due for re-planting between 2019-2024. Companies may decide on whether to replant based on this initial assessment (refer

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Clause	Indicators	Comply Yes/No	Findings
	<p>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.</p> <p>This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p>		<p>to figure A5-1). Records showed that a Pilot Trial on “Drainability Assessment of Existing Oil Palm Planting in Block PS7 of 10 ha of Bukit Leelau Estate”, had been conducted in September, 2019 and revised and updated report was published in October 2021. The assessment covered Block PS7 of 10 ha of 98.63 ha of peatland in Bukit Leelau Estate and was reported to RSPO Secretariat in October, 2021.</p>
	<p>7.7.6 (C) All existing plantings on peat are managed according to the ‘RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat’, ver. 2 (2018) and associated audit guidance.</p>	<p>Yes</p>	<p>Bukit Leelau CU continued to manage all existing plantings on peat according to the ‘RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat’, version 2 (2018) and associated audit guidance. The Estate continued to manage peat area with proper facilities and equipment such as water weirs, water table, piezometer and subsidence pole. All of these facilities were regularly monitored and reported to the estate manager on weekly and monthly basis. The monitoring reports are in place and has been verified by auditor.</p>
	<p>7.7.7 (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as “peatland conservation areas”; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the ‘RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat’, ver. 2 (2018) and associated audit guidance.</p>	<p>Yes</p>	<p>Bukit Leelau CU owned the land as it was leased and bought from the previous landowner which is Pahang State government and KBDYMM Sultan Pahang since 1976 - 2001. In addition, there have been no new land clearing or new development since 15 November 2018. There were no unplanted and set-aside peatlands in the managed areas in Bukit Leelau Estate.</p>
<p>7.8</p>	<p>7.8.1 A water management plan is in place</p>	<p>Yes</p>	<p>Water management plan was established in document “Water management plan 2022-</p>

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Clause	Indicators	Comply Yes/No	Findings
Practices maintain the quality and availability of surface and groundwater.	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:		management and action plans” reviewed in Aug 2022. The water management plan used as a guidance to the operating in relation to: <ul style="list-style-type: none"> • Water resources management • Chemical / natural treatments of water sources • Domestic usage • Implementation & prevention of surface water pollution • Groundwater pollution • Water management at peat area • Utilization of water for cultivation • Flood mitigation
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	Yes	No restrictions to access of clean water. And results from identified water sampling points for the natural streams located in the estates were indicated as not contributing to any pollution to water used by the communities surrounding.
	7.8.1b Workers have adequate access to clean water.	Yes	In the CU, the water quality monitoring was initiated to establish water quality baselines. Water sampling located in the estate was conducted sent to 3 rd party lab and results were following WHO/MOH limits.
	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	Visits to swampy area & unnamed stream around the estates confirmed that all the buffer zones has been maintained accordingly (marking palms & signboard) natural grasses has been maintained.
	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	<ul style="list-style-type: none"> • License number valid until 30/06/2023. The license indicated that the mill has a capacity of 45mt/hr • Treated effluent is allowed to be discharge as waterways – Sg. Temiang. • Analysis of the final discharge was carried out on monthly basis by FGV Palm Industries Sdn Bhd and have been reported to DOE by quarterly basis. Results from sampling was found to be below the regulated limit.
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	Yes	Mill water usage per tonne FFB has been recorded by daily basis and reported by monthly basis in document “monitoring record- water usage for processing.
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	Diesel usage has been monitored on daily basis and been reported by monthly basis.

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<p>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.</p>	<p>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.</p>	<p>Yes</p>	<p>Bukit Leelau CU had used RSPO Palm GHG version 4.0 Calculator as a tool to calculate the GHG emissions. The input data was verified, and the following were determined:</p> <table border="1" data-bbox="1070 352 1525 472"> <thead> <tr> <th>Description</th> <th>tCO₂e/tProduct</th> </tr> </thead> <tbody> <tr> <td>CPO</td> <td>11.94</td> </tr> <tr> <td>PK</td> <td>11.94</td> </tr> </tbody> </table> <table border="1" data-bbox="1070 501 1715 707"> <thead> <tr> <th>Land Use</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>OP Planted on mineral soil</td> <td>14907.73</td> </tr> <tr> <td>OP Planted on Peat</td> <td>98.63</td> </tr> <tr> <td>Conservation (forested)</td> <td>4.36</td> </tr> <tr> <td>Conservation (non-forested)</td> <td>45.49</td> </tr> </tbody> </table> <p>Milling extraction rate:</p> <table border="1" data-bbox="1070 762 1653 852"> <tbody> <tr> <td>OER</td> <td>24.29</td> </tr> <tr> <td>KER</td> <td>4.17</td> </tr> </tbody> </table> <p>Mill Emission</p> <table border="1" data-bbox="1070 911 1877 1222"> <thead> <tr> <th colspan="3">Own Crop</th> </tr> <tr> <th>Emission source</th> <th>tCO₂e</th> <th>tCO₂e/tFFB</th> </tr> </thead> <tbody> <tr> <td>POME</td> <td>637434.31</td> <td>3.26</td> </tr> <tr> <td>Fuel consumption</td> <td>1554.38</td> <td>0.01</td> </tr> <tr> <td>Grid electricity utilisation</td> <td>0</td> <td>0</td> </tr> <tr> <td>Credits</td> <td></td> <td></td> </tr> <tr> <td>Export of excess electricity to housing & grid</td> <td>0</td> <td>0</td> </tr> <tr> <td>Sale of PKS</td> <td>0</td> <td>0</td> </tr> <tr> <td>Sale of EFB</td> <td>0</td> <td>0</td> </tr> <tr> <td>Total</td> <td>638988.69</td> <td>3.27</td> </tr> </tbody> </table> <p>Plantation / field emission</p> <table border="1" data-bbox="1070 1278 2040 1358"> <thead> <tr> <th colspan="4">Own Crop</th> </tr> <tr> <th>Emission sources</th> <th>tCO₂e</th> <th>tCO₂e/ha</th> <th>tCO₂e/FFB</th> </tr> </thead> <tbody> <tr> <td>Land Conversion</td> <td>73323.49</td> <td>9.28</td> <td>0.43</td> </tr> </tbody> </table>	Description	tCO ₂ e/tProduct	CPO	11.94	PK	11.94	Land Use	Ha	OP Planted on mineral soil	14907.73	OP Planted on Peat	98.63	Conservation (forested)	4.36	Conservation (non-forested)	45.49	OER	24.29	KER	4.17	Own Crop			Emission source	tCO ₂ e	tCO ₂ e/tFFB	POME	637434.31	3.26	Fuel consumption	1554.38	0.01	Grid electricity utilisation	0	0	Credits			Export of excess electricity to housing & grid	0	0	Sale of PKS	0	0	Sale of EFB	0	0	Total	638988.69	3.27	Own Crop				Emission sources	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/FFB	Land Conversion	73323.49	9.28	0.43
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	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).	Yes	Auditor has verified through checking the www.globalforestwatch.com , Google Maps, Estate Maps and also through site visit to the sampled estates areas. Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at Bukit Leelau 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	All waste products and sources of pollution identified and documented through "Waste Management Plan & Reduction Plan for the Year 2022" in the Environmental Management Plan and Environmental Impact assessment that applicable for both mill and estates. The waste management plan has also identified source of waste products/pollutants, waste generation, action plan & monitoring, documents to be reviewed, management review, comments & time bound and person in charge. Other sources of pollutions are also listed in the plan such as workshop, line-site, office, store, canteen, effluent pond, boiler. Sources of pollution and waste have been adequately identified by the mill and estate. Generally, the wastes identified were of general, recyclable and scheduled wastes. It had listed the waste product, sources of pollution, mitigation measures, target, and person responsible. Among the wastes that were identified include domestic wastes from household, scrap iron, empty chemical containers, scheduled wastes and mill wastes such as POME, EFB, fiber & shell and etc.																																
7.11 Fire is not used for preparing land and is prevented in the managed area.	7.11.1 (C) Land for new planting or replanting is not prepared by burning.	Yes	There was no land preparation of existence or new planting in Bukit Leelau CU by burning ever since IOI Group Sustainable Palm Oil Policy (SPOP) has practised zero burning, guided by the Zero Burning Policy. In all the replants of 2016 and 2017 visited during the audit in the CU and it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for the Oil Palm cultivation. Signages prohibiting open burning, " <i>Dilarang Membakar</i> " were also viewed.																																

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	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	Yes	Bukit Leelau CU had established Emergency Response Procedures updated in March 2022 for fire prevention and control measures in field / peat areas in the CU. The procedure was formalized for use in all certification units in IOI Group Estates and mills. Training related to fire drill are conducted annually. Fire fighting equipment was available & sufficient such as: <ul style="list-style-type: none"> • Water tank with hose • Water tank pump • Pails and buckets • Spray pump • Fire extinguisher
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	Yes	There were evidence that the Bukit Leelau CU engages with adjacent stakeholders such as FGV Ladang Lepar Hilir 5, LKPP Ladang Pulau Manis, Ladang Jambu, Ladang RTK, Acropolitan and Ladang Felcra through briefing sessions on fire prevention and control measures, through the stakeholder meeting held in June & July 2022 and attended by stakeholders.
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, it was confirmed that no land clearing at Bukit Leelau CU had occurred since Nov 2005.
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	Yes	There is HCV Assessment for each estate using internal Assessor: HCV Assessment Report was prepared in September 2014 and reviewed in April 2021 (Detas Estate and Bukit Leelau Estate) August 2021 (Merchong Estate and Mekassar Estate), resulting as 29.63 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	Yes	

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	and take into account wider landscape-level considerations.		
	7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).	Yes	It was evident that all estates have established an action plan for HCV area titled 'HCV Management Action Plans and Continuous Improvement Programme', and the implementation of the programs were in progress. Some of the HCV programs were as listed below: <ol style="list-style-type: none"> 1- Erected and maintain signage of 'no hunting' and 'no fishing' at the forest boundary and buffer zone area. 2- Avoid Chemical usage near the Forest reserve Boundary, Buffer Zone 3- HCV monitoring for illegal activities by Auxillary Police (AP) – one month once 4- Monitor illegal entering worshipping area and buffer zone area 5- HCV training (RTE, Buffer, Wild life) to workers, staff and stakeholders
	7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	Yes	There were no rights of local communities have been identified in HCV areas at IOI Bukit Leelau CU. So, this indicator was not applicable with this CU.
	7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill	Yes	Awareness training pertaining HCV and RTE were provided to staff and workers. Among other, the training contains information about legal and disciplinary actions if found guilty. All the visited estates will conduct training programme on HCV and ERT by annually. Briefing on HCV had been extended to external stakeholders during Stakeholders meeting.

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	these species.		
	7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	Yes	There were no RTE reported present in the supply bases. However, the supply bases continued implement action plans such as to conserve the identified areas, boundary monitoring, and buffer zone awareness to staff and workers.
	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	Not applicable since there is no new land clearing
AUDITORS' GUIDE IN REPORTING ORANG ASLI MATTERS (if applicable) – FOR NON-COMPLIANCES, TO RAISE AT SPECIFIC INDICATORS IN THE MYNI CHECKLIST.			
No specific clause – Information related to Orang Asli / Indigenous People:	<p><u>To include details on Orang Asli</u></p> <p>1.To report the name of their kampung and placement (penempatan). No. of the residents of Orang Asli.</p> <p>2.Where they are located (radius within 5km from the CU). Check the estate map and estate boundary on neighboring Orang Asli villages.</p> <p>3.Verify the stakeholders list on neighboring Orang Asli community with the CU.</p> <p>4.Read the SIA or SEIA and HCV or HCV-HCSA reports if these assessments had identified potential Orang Asli village(s) that may be affected by the CU operation. If yes, what the issues and recommended mitigation action.</p> <p>5.Verify if any of estate activities may affected the Orang Asli through consultation with auditor. Get the information from head of village (local & Orang Asli) how they started the village (origin, nomad, or separation from other orang asli village), their daily needs, roaming area, sacred area, grave, food source, supply of clean water, where they work, and education for their children.</p> <p>6.Evidence of FPIC had been implemented by the CU and consent given by the Orang Asli</p>	Yes	<p><u>Kg Tanjung Kelapa (60 households)</u></p> <ul style="list-style-type: none"> Village located more than 5 km from Bukit Leelau Estate boundary Originally, they are from Sawah Batu but they migrated to stay in their ancestor land. Water and electricity supply were facilitated/assisted by GEF (NGO) and electricity The company already identified them since long time and always updated their representative in the Stakeholder List Stakeholder's consultation with Orang Asli communities has been comprehensively and participatorily conducted on 4/8/2022. Sighted SIA Management Action Plan for 2022 contains social issues that have been participatorily identified by the CU with the Orang Asli. The Plan contain measures for mitigating negative social impacts or enhancing positive social impacts. Social issues affecting stakeholders and neighbouring community, maintenance and monitoring of grievance were included in the Plan. However, no social issue affecting to Kg Tanjung Kelapa was noted. Children basic education is at SK Sawah Batu and secondary education is in Bandar Muadzam There is no FPIC issue found for Bukit Leelau CU from Kg Tanjung Kelapa The CSR to Kg Included food donation. The CU had provided employment to Orang Asli villagers either direct or indirectly through plantation contractors. Access to the village was facilitated by gate opening, 'guard house' and guard.

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	<p><i>communities.</i> 7.What are the CSR from the CU to Orang Asli. Significant CSR for long term development for Orang Asli? Any specific request/needs from Orang Asli from the CU? 8.Consult DFO of Forestry Department and PERHILITAN for any issues related to the Orang Asli. 9.Provide the specific names of Orang Asli representatives sampled during every audit.</p>		<ul style="list-style-type: none"> • Medical treatment were provided FOC by Bukit Leelau CU's Clinic also as CSR contribution. Villagers can also go to the Mother and Child Clinic at Kota Perdana and Muadzam Hospital for medical treatment. • There is no issue related to Perhilitan and Forestry Department with Orang Asli from Kg Tanjung Kelapa. • Grave sites were located outside of Bukit Leelau CU area • Representative of Kg Tanjung Kelapa interviewed was Pak Asa <p><u>Kg Runchang (more than 100 families)</u></p> <ul style="list-style-type: none"> • Located more than 10 km from the Bukit Leelau Estate boundary • Village under the administration of JKKK Kg Runchang • Livelihood of the villagers are agriculture, forage of forest products, works in the durian plantation outside the village and some are employed by the Oil palm plantations near the village • Village provided with electricity and treated water by the Government • Stakeholder's consultation with Orang Asli communities has been comprehensively and participatorily conducted on 4/8/2022. Sighted SIA Management Action Plan for Bukit Leelau 2022 contains social issues that have been participatorily identified by the CU with the Orang Asli. The Plan contain measures for mitigating negative social impacts or enhancing positive social impacts. Social issues affecting stakeholders and neighbouring community, maintenance and monitoring of grievance were included in the Plan. However, no social issue affecting to Kg Runchang was noted. • There is no FPIC issue found for Bukit Leelau CU from Kg Runchang • The CSR to Kg Runchang included donation and employment for villagers. Access to the Kg was facilitated by the CU by installing a 'boom gate'. • The CU had provided employment to Orang Asli villagers either direct or indirectly through plantation contractors. • Medical treatment were provided FOC by Bukit Leelau CU Clinic as CSR contribution. They can also go to the Mother and Child Clinic at Kota Perdana and the Muadzam Hospital for medical treatment. • There is no issue related to Perhilitan and Forestry Department with Orang Asli at Kg Runchang • Children basic education is at SK Bandar Dua and secondary education is in Bandar Muadzam • Grave sites were located outside of Bukit Leelau CU area • Representative of Kg Runchang interviewed was Hapizan a/l Hamzah <p><u>Kg Kundang (10 households)</u></p>
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			<ul style="list-style-type: none"> • Located about 5 km from the boundary of Detas Estate • Originally from Kg Sawah Batu • Village not provided with electricity and treated water by the Government • Livelihood of the villagers was agriculture, forage of forest products and some working in nearby palm oil plantations nearby estates • Stakeholder's consultation with Orang Asli communities has been comprehensively and participatorily conducted on 2/7//2022. Sighted SIA Management Action Plan for 2022 for Detas Estate contains social issues that have been participatorily identified by the CU with the Orang Asli. The Plan contain measures for mitigating negative social impacts or enhancing positive social impacts. Social issues affecting stakeholders and neighbouring community, maintenance and monitoring of grievance were included in the Plan. However, no social issue affecting to Kg Kundang was noted. • The CU had provided employment to Orang Asli villagers either direct or indirectly through plantation contractors. • Children basic education is at SK Bandar Dua and secondary education is in Bandar Muadzam • There is no FPIC issue found for Bukit Leelau CU from Kg Kundang • The CSR to KG Padang included donation and employment. • Medical treatment were provided FOC by Bukit Leelau CU Clinic as CSR contribution. They can also go to the Mother and Child Clinic at Kota Perdana and the Muadzam Hospital for medical treatment. • There is no issue related to Perhilitan and Forestry Department with Orang Asli at Kg Kundang • Grave sites were located outside of Bukit Leelau CU area • Representative of Kg Kundang interviewed was M.Rani <p><u>Kg Sawah Batu (more than 100 families)</u></p> <ul style="list-style-type: none"> • Located more than 10 km from the Merchong Estate and Mekassar Estates Estate boundaries. • Village under the administration of JKKK Kg Sawah Batu • Livelihood of the villagers are agriculture, forage of forest products, works in the durian plantation outside the village and some are employed by the Oil palm plantations near the village • Village provided with electricity and treated water by the Government • Stakeholder's consultation with Orang Asli communities has been comprehensively and participatorily conducted on 30/6/2022. Sighted SIA Management Action Plan for Merchong and Mekassar Estates 2022 contain
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			<p>social issues that have been participatorily identified by the CU with the Orang Asli. The Plan contain measures for mitigating negative social impacts or enhancing positive social impacts. Social issues affecting stakeholders and neighbouring community, maintenance and monitoring of grievance were included in the Plan. However, no social issue affecting to Kg Sawah Batu was noted.</p> <ul style="list-style-type: none"> • There is no FPIC issue found Bukit Leelau CU from Kg Sawah Batu • The CSR to Kg Sawah Batu included donation and employment for villagers. Access to the KG was facilitated by the CU by installing a 'boom gate'. • The CU had provided employment to Orang Asli villagers either direct or indirectly through plantation contractors. • Medical treatment were provided FOC by Bukit Leelau CU Clinic as CSR contribution. They can also go to the Mother and Child Clinic at Kota Perdana and the Muadzam Hospital for medical treatment. • There is no issue related to Perhilitan and Forestry Department with Orang Asli at Kg Sawah Batu • Children basic education is at SK Sawah batu and secondary education is in Bandar Muadzam • Grave sites were located outside of Bukit Leelau CU area • Representative of Kg Sawah batu interviewed was Hamid Sepeh
	<p><u>Common social issues on Orang Asli</u> 1.Accessibility for Orang Asli from their village to the estate and/or roaming area. 2.Protection of cemetery of Orang Asli which located within the estate. 3.Oppportunity for employment – male & female. 4.Do they understand the employment procedures and agreement? 5.Are their employment contract complying with the RSPO P&C MYNI 2019? 6.Did they receive appropriate trainings & briefings and other necessities (PPE) to work as other local/foreign workers? 7.Replanting activity that may affected the Orang Asli community. 8.Accessibility for clean water from nearby river or water scarcity. 9.Hunting of wild boar/monkey/fish/birds within estate area or at the estate boundary.</p>	<p align="center">Yes</p>	<ol style="list-style-type: none"> 1. There is no issue of accessibility for Orang Asli from their village to the estate and/or roaming area at Bukit Leelau CU. Access to the Kg Sawah Batu, Kg Runchang, Kg Kundang and Kg Tanjung Kelapa was facilitated by Bukit Leelau CU through gate opening, 'guard house' and guard. Access to the Orang Asli villages was facilitated by the CU by installing a 'boom gate'. Orang Asli access to the HS Ibam was not through Bukit Leelau plantation. Interviewed Orang Asli representatives acknowledged that forest roaming and access for their livelihood are currently of least importance to their livelihood. 2. Cemetery for Kg Sawah Batu, Kg Runchang, Kg Kundang and Kg Tanjung Kelapa are sited outside the Bukit Leelau CU plantations. 3. Appointed Harvesting contractors by Bukit Leelau CU in turn provided indirect employment for the Orang Asli from the four(4) villages. Both male and female were employed by the contractors. The CU had also provided direct employment to the Orang Asli (as Driver in the Plantation for example). 4. Interviewed Orang Asli workers understood the employment procedures and agreement. 5. Reviewed employment contract complied with the RSPO P&C MYNI 2019 6. Orang Asli employees of the contractors received appropriate trainings & briefings and other necessities (PPE) to work as other local/foreign workers.

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	<p>10. Education for the Orang Asli children.</p>		<ul style="list-style-type: none"> 7. No replanting currently at Bukit Leelau CU Plantations. 8. Only two Orang Asli villages (Kg Sawah Batu and Kg Runchang) have access to clean water. Kg Tanjung Kelapa and Kg Kundang still relied on river and rain water although water treatment system was facilitated by an NGO at Kg Tanjung Kelapa. 9. No hunting was carried out by Orang Asli communities within Bukit Leelau CU area or at estate boundary. This is due to scarcity of boar/monkey/fish and birds within the estates. The Orang Asli preferred to hunt in the Ibam Forest Reserve where they have access. 10. Primary education for children of the Orang Asli villages are at the SK Sawah Batu and SK Kota Perdana while their secondary education are in Bandar Muadzam.
	<p><u>What CU needs to do to address the issues</u> 1.FPIC with the affected Orang Asli communities on the estate operation. 2.Annual external stakeholder consultation with Orang Asli representative. 3.Stakeholder consultation with the community had been conducted during initial SIA assessment. 4.Review social action plan with participatory of affected Orang Asli. 5.Brief and circulate grievances/ disputes mechanism/procedure. 6.To offer job opportunity to Orang Asli – male & female. 7.Protection of Orang Asli sacred area or grave. 8.CSR to Orang Asli - grass cutting, LF collection, nursery, road/bridge maintenance, food donation, transport services for Orang Asli children to go to school, etc.</p>	<p align="center">Yes</p>	<ul style="list-style-type: none"> 1. No FPIC issues with the Orang Asli communities at Bukit Leelau CU. This is confirmed by the representatives of Kg Sawah Batu, Kg Runchang, Kg Kundang and Kg Tanjung Kelapa interviewed during the audit 2. Stakeholder’s consultation with Orang Asli communities has been comprehensively and participatorily conducted on 4/8/2022 and 30/6/2022. Sighted SIA Management Action Plan for 2022 at all Estates contains social issues that have been participatorily identified by the CU with the Orang Asli. The Plan contain measures for mitigating negative social impacts or enhancing positive social impacts. Social issues affecting stakeholders and neighbouring community, maintenance and monitoring of grievance were included in the Plan. However, no social issue affecting all the Orang Asli villages were noted. 3. A stakeholder consultation with Orang Asli community was initially done during initial SIA assessment. 4. The updated Social Action Plan (2022) for all Estates had included participatory feedback from the Orang Asli communities (refer to Orang Asli village requests and resolution during Stakeholder’s meeting) 5. The Orang Asli communities had been given briefing on grievance/dispute mechanism through stakeholders’ consultation on 4/8/2022 and 30/6/2022 6. Jobs opportunity for both male and female Orang Asli villagers was provided indirectly by Bukit Leelau CU through appointment of Orang Asli workers by appointed contractors by the CU for loose fruits collection, Harvesting and nursery works. Also, direct employment by the mill and plantation. 7. No Orang Asli villages sacred place and cemeteries are located within Bukit Leelau CU Plantations 8. Bukit Leelau CU had continued to provide CSR to Orang Asli communities as evidenced by donations, road repairs/Maintenance etc

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Clause	Indicators		Comply Yes/No	Findings			
5.5.2 Time-bound plan A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.	(a)	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.		IOI Corporation Berhad is in progress to certify 5 PMU's from 2020 to 2021 as verified through Time Bound Plan (TBP) as 30/06/2021 as follows:			
				No	Plantation Management Unit (PMU)	TBP (Year)	Status
				1	PT Sukses Karya Sawit, Indonesia	2021	RSPO Complaints Panel (CP) has officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development. First and Second quarterly update for the action plan on PT. SKS, PT. BNS and PT. BSS was submitted to RSPO Investigate and Monitoring Unit in December 2018 and February 2019 respectively. On 15th April 2019, RSPO's official announced "that the monitoring of the implementation of the Complaints Panel directives for "PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No: GR-000882 " is now officially closed." IOI received an email from RSPO that "the Investigation & Monitoring Unit (IMU) of the RSPO Secretariat had finalized the internal review of the action plan and progress reports submitted by IOI against the Complaints Panel's directives and the IMU concluded that IOI has successfully met all the requirements set by the Complaints Panel."

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						Further and updated progress of this issue could be access through the link below; (a) RSPO Ketapang Complaint for PT BSS, PT SKS & PT BNS (b) RSPO Case Tracker – PT BSS, PT SKS & PT. BNS Status of Complaints	
				2	PT Berkat Nabati Sawit, Indonesia	2021	RSPO Complaints Panel (CP) has officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development. First and second quarterly update for the action plan on PT. SKS, PT. BNS and PT. BSS was submitted to RSPO Investigate and Monitoring Unit in December 2018 and February 2019 respectively. On 15th April 2019, RSPO's official announced "that the monitoring of the implementation of the Complaints Panel directives for "PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No: GR-000882 " is now officially closed."
				3	PT Bumi Sawit Sejahtera, Indonesia	2021	IOI received an email from RSPO that "the Investigation & Monitoring Unit (IMU) of the RSPO Secretariat had finalized the internal review of the action plan and progress reports

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				<p>submitted by IOI against the Complaints Panel's directives and the IMU concluded that IOI has successfully met all the requirements set by the Complaints Panel." Further and updated progress of this issue could be access through the link below; (a) RSPO Ketapang Complaint for PT BSS, PT SKS & PT BNS (b) RSPO Case Tracker – PT BSS, PT SKS & PT. BNS Status of Complaints RSPO Stage 1</p>		
			4	<p>PT KPAM, Indonesia</p>	2023	NPP and HCSA was approved in April 2018. Currently under development.
			5	<p>IOI-Pelita Sarawak</p>	2021	Resolution process (under RSPO CP)
<p>The Stage 1 of RSPO P&C audit was conducted on 9th – 12th September 2019 by BSI (for Indonesia CU). However, due to the pandemic issue, certification preparation was affected such as HGU process and as well as on ground preparation. Hence, the main assessment audit expected to be conducted in year 2021. Sighted approval letter from RSPO on January 2020.</p> <p>Stage 3: Negotiations for Final Settlement (ioi Pelita Sarawak) Following the statement issued by IOI Pelita on 19 March 2021, IOI Pelita obtained the support of RSPO to proceed with the negotiation stage of the resolution process. All the eight participating communities confirmed in writing their readiness.</p> <p>IOI Pelita held the first round of negotiations with all the eight community groups, one at a time, on 5-7 April in Miri. The meetings were observed by RSPO and other relevant stakeholders such as the Sarawak State government representatives.</p> <p>At each meeting, the facilitator asked each community group whether or not they were giving their consent to proceed with the first round of negotiations. All the eight community groups gave their consent. Then each community group presented their list of demands towards IOI</p>						

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			<p>Pelita. Following that, IOI Pelita asked clarifying questions to make sure the demands were well understood. Finally, all observers were given a chance to make their comments.</p> <p>In its opening remarks, IOI Pelita reconfirmed its offer to excise the unplanted land of approximately 4,000-5,000 ha, which the Sarawak State Government had agreed to declare as Native Communal Reserve and provide communal and individual land titles thereon to all the eight community groups. The right of each community group to request expert advice at any point of time during the negotiation stage was emphasized. IOI also clarified that it had no authority to decide how the excised land would be divided among the communities, and the communities themselves would have to manage that process using Adat (customary law) as guidance. Based on the list of demands presented by the communities during the first round of negotiations, IOI Pelita developed a settlement offer for each community group. The settlement offer letters were sent to all community groups on May 31st to provide the communities with sufficient time to consider these offers before the second round of negotiations, which will be conducted as soon as a) it is safe for key participants to meet physically in Sarawak, and b) the communities confirm that they are ready for the second round.</p> <p>Further and updated progress of this issue could be access through the link below;</p> <ul style="list-style-type: none"> (a) IOI Pelita Land Dispute Resolution Plan (b) Current progress on IOI Pelita Land Dispute Resolution Process (c) https://www.ioigroup.com/Content/MEDIA/M_Media?Category=7 (d) RSPO Case Tracker – IOI Pelita Status of Complaints (e) IOI Pelita & Stakeholders Reaching a Breakthrough <p>Internal audit for Sejap Estate have been completed in November 2020.</p>
	(b)	<p>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</p>	<p>The time-bound plan contains a list of subsidiaries, estates and mills. Based on the time bound plan (Refer to Attachment 7), 14 units have been certified after obtaining RSPO membership and 5 uncertified units are in progress for certification.</p>

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		appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;	
	(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);	No revision of the time bound plan. The time bound plan was endorsed by the Sustainability Department, IOI Corporation Berhad.
	(d)	Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised.	The details of the Time Bound Plan described as per attachment 6. IOI is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details were provided in the Time Bound Plan described as per attachment/revision in the TBP. As of this audit and Verification of documents and Timebound Plan there are no isolated lapses and fundamental failure to proceed with implementation of the plan in implementation of a time-bound plan.
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;	Based on the internal audit report for 8 uncertified unit of IOI Group dated 16-19/07/2019 (Indonesia), 19-21/02/2019 (Sarawak) and the time bound plan, there was no new replacement of primary forest or HCV after 01/01/2010, including for 1 uncertified units at IOI Pelita (Sarawak). However, for the other 4 uncertified units namely, PT Sukses Karya Sawit, PT Berkat Nabati Sawit, PT Bumi Sawit Sejahtera and PT KPAM, replacement of primary forest after 1/1/2010 were reported. Update on the RSPO Suspension and Complaint by Aidenvironment against PT Sukses Karya Sawit (PT SKS), PT Berkat Nabati Sawit (PT BNS) and PT Bumi Sawit Sejahtera (PT BSS); Final verification by RSPO CP was conducted at the end of Jan 2018. IOI received a letter from RSPO Complaints Panels' dated 12/7/2018 with regards to the final decision on the complaint. Few additional recommendations were highlighted in their letter. Further and updated progress of this issue could

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			<p>be access through the link below; https://rspo.org/members/complaints/statusof-complaints/view/80. Certification preparations in progress. As part of the preparation, a Certification Body had been engaged to conduct the gap assessment. The gap assessment was conducted at the end of Aug 2018 and the management planned to go RSPO Assessment Stage 1 in Aug 2019. Governmental 'Hak Guna Usaha' (HGU) application in progress. As for PT KPAM, Indonesia, this company is in the process to conduct NPP upon completion of HCV report and review by HCVRN. All reports will be posted on the RSPO for Public Consultation.</p>
(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8;		<p><u>IOI-Pelita Sarawak</u> Handing over of the ex-gratia payment ceremony has been conducted on 5th September 2019 in Miri involving members from 4 main communities respectively. Second stage of the Resolution Plan, 3D Community Participatory Mapping, started in August 2019. Technical assistance to the affected communities is being provided by CICOM. By mid-March 2020, six out of nine affected communities had their surveys done. Unfortunately, at that point, the coronavirus outbreak reached Sarawak and the government issued Movement Control Order. The Community Participatory Mapping had to be put on hold.</p>
(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2;		<p>Based on internal audit report for uncertified units of IOI Group dated 16-19 July 2019 (Indonesia), 19 -21 February 2019 (Sarawak), there was no issue on labour disputes for all uncertified units.</p>
(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;		<p>Based on internal audit report for uncertified units of IOI Group dated 16-19 July 2019 (Indonesia), 19 -21 February 2019 (Sarawak), there was no issue on legal non-compliance for all uncertified units.</p>
(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 5.5.3 (a) – (d) above by the audit team based on self-declarations only by the company,		<p>Based on statement in (a) to (d) above, the CU has assessed the condition of their uncertified unit and has stated full commitment to comply with all relevant requirements as specified above.</p> <ul style="list-style-type: none"> a) Sighted the series of Internal Audit and External Audit (MSPO Certification) on their uncertified unit as conducted and reported accordingly. The audit was conducted against RSPO P&C and RSPO Partial Certification Requirements. b) Evidence of audit attendance list, audit checklist & report were

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	with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:			
	<ul style="list-style-type: none"> A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement; 			
	<ul style="list-style-type: none"> Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. 			
	<ul style="list-style-type: none"> Desktop study e.g. web check on relevant complaints 			
	<ul style="list-style-type: none"> If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements. 			
(f)	For requirements 5.5.3 (a)-(d) above, the classification of critical and non-critical is as stated in the RSPO P&C. If a non-compliance against a critical indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless it is actively addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be available.			<p>made available to auditor as the supporting evidence.</p> <p>c) Verification through www.globalforestwatch.com , GOOGLE maps data, estates maps and through HCV assessment report, and planting profile there was no new planting and no new development of area was observed. Verified through RSPO website: https://www.rspo.org/members/status-of-complaints/, https://askrspo.force.com/Complaint/s/case/50090000028Erz8AAC/detail</p> <p>d) No further stakeholder consultation or field inspection were conducted.</p> <p>e) With this, it can be concluded that the positive assurance made was justified.</p> <p>Based on internal audit report for uncertified units of IOI Group dated dated 16-19 July 2019 (Indonesia), 19 -21 February 2019 (Sarawak), the IOI had assessed all uncertified units on the requirements (a) – (e). IOI Group also has made a positive assurance statement for A) Time bound plan, B) Requirements for uncertified management units and/or holdings, and C) Timely Notification of Changes, through an official letter 'Statement of Declaration by Organization (Grower) on the compliance with Rules for Partial Certification as per Time Bound Plan dated 01 July 2020.</p>
(g)	Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above			As of this audit, Bukit Leelau CU still on track and follow the requirement of uncertified requirement units, Further information can be obtained from

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		<p>may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these Certification Systems.</p>	<p>IOI ACOP. The details of the Time Bound Plan described as per attachment 6. IOI is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills. Details were provided in the Time Bound Plan described as per attachment/revision in the TBP.</p>
<p>5.6.6 The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p> <p>The CB shall have a mechanism in place to identify the interested parties and ensure a represented samples size of the interested parties are consulted in each audit.</p> <p>The CB shall keep track which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle.</p>		<p>No additional indicators</p>	<p>Bukit Leelau CU owned the land as it was leased and bought from the previous landowner which is Pahang State government and KBDYMM Sultan Pahang since 1976 - 2001. Based on the interviews held with local communities from Kg Gadak, Kg Runchang and Kg Menchupu, Kg Sawah Batu, Kampung Inoi, Kg Kundang and Kampung Aur it was confirmed that there is no case concerning the rights of local communities and indigenous peoples. The Bukit Leelau POM premises are located within Bukit Leelau Estate land title (20.35ha). The land titles are issued under the names of Perusahaan Mekassar (M) Sdn Bhd, and the land title specifies land use to be for oil palm.</p> <p>All the visited operating units have the copies of their land titles kept at their administration office.</p>

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ATTACHMENT 4

DETAILS OF NON-CONFORMITIES AND CORRECTIVE ACTIONS TAKEN

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Root Cause & Corrective Action Taken by the CU	Verification Statement by Auditors
3.3.2	Upgraded Major	<p>Finding: Bukit Leelau CU was not able to demonstrate that procedures that have been put in place have been consistently complied with. These procedures are contained in SIA Management Action Plans & Continuous Improvement Plans.</p> <p>Objective evidence: The SIA Management Action Plans & Continuous Improvement Plans of Detas, Mekassar and Merchong Estates (reviewed on 18/8/2022) had specified that:</p> <p>a) Visiting Medical Officer (VMO) will visit the estate clinics by the once a fortnight. However, the VMO's visits were as follows:</p> <p style="margin-left: 20px;">i. At Detas Estate: once a month i.e., 24/6/2022, 27/7/2022, 2/8/2022.</p> <p style="margin-left: 20px;">ii. At Mekassar Estate: once a month i.e., 20/4/2022, 18/5/2022, 15/6/2022, 20/7/2022, 18/8/2022.</p> <p style="margin-left: 20px;">iii. At Merchong Estate once a month i.e., 20/4/2022, 18/5/2022, 22/6/2022, 20/7/2022, 18/8/2022.</p> <p>b) Each estate is to carry out a price comparison of items sold between estate shops and shops outside the estate. However, this was either not carried out adequately or at all.</p> <p style="margin-left: 20px;">i. Detas Estate inadequately compared only the prices of eggs, chicken, sugar and cooking oil.</p> <p style="margin-left: 20px;">ii. Mekassar Estate could not demonstrate that price comparison was carried out.</p>	<p>The root cause:</p> <p>(a) <u>VMO visit</u> As the number of visits by VMO was mentioned only once in a month in contract for service – Visiting Medical Officer between;</p> <p style="margin-left: 20px;">(i) Detas Estate and Klinik Azzahra dated 28.02.2022, and</p> <p style="margin-left: 20px;">(ii) Mekassar Estate & Merchong Estate and Dr. Ahmad Basri B Abdullah (Klinik Ikhwan) dated 21.02.2022,</p> <p>the management had misinterpreted the clause in Act 446 which the VMO has to visit the estate clinic once a fortnight.</p> <p>(b) <u>Price Comparison</u> Since the management did not force the workers to only buy the items in the estate shop and they are freely to choose their preferred shops, the management felt that the comparison of the price is not compulsory to do so.</p> <p>Correction:</p> <p>(a) <u>VMO visit</u> The management had revised the contract for service and issued to the appointed VMO by amending the frequency which to be conducted once a fortnight. Meanwhile, the management had liaised with VMO to</p>	<p>Root cause, correction and corrective action has been verified by the auditor.</p> <p>Cited the arrangement for the monitoring under VMO/HA and the established “Sustainability Monitoring Visit Checklist” as a mechanism to handle the pricing issue.</p> <p>Status: CLOSED</p>

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			<p>explain in details the requirement as per clause mentioned in Act 446 pertaining the frequency of the visit.</p> <p>(b) <u>Price Comparison</u> The management of Detas Estate and Mekassar Estate had immediately conducted the price comparison between the shops in the estate with the shops outside the estate which the outside shops are usually attended by the workers to buy the daily basic items.</p> <p>Corrective action:</p> <p>(a) <u>VMO visit</u> The management had made arrangement to ensure the frequency of visit by the VMO to the estate clinic once in fortnight by closely follow up. Meanwhile, Hospital Assistant for each estate is responsible as a key person to make sure the frequency of visit is strictly followed and inform the management if VMO unable to do so.</p> <p>(b) <u>Price Comparison</u> The element of price comparison for the items sold in the estate shop and the shops outside the estate is included in the "Sustainability Monitoring Visit Checklist" which to ensure that each operating unit is complied with the procedures mentioned in SIA Management Action Plans & Continuous Improvement Plans. The frequency of price comparison should be conducted every 6 months.</p>	
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6.6.2	Major	<p>Finding: The Company's existing SOP on MY EG Foreign Worker Permit Renewal has not been comprehensively established.</p> <p>Objective evidence: The SOP on MY EG Foreign Worker Permit Renewal is not comprehensive. It does not take into account variations to the normal procedures in permit and passport renewals of foreign workers. This has resulted in the following workers' permits not being renewed within the stipulated timeframe.</p> <table border="1" data-bbox="524 512 1249 930"> <thead> <tr> <th>Estates</th> <th>Workers' passport no.</th> <th>Visit Pass (TE) expiry dates</th> </tr> </thead> <tbody> <tr> <td rowspan="6">Bukit Leelau</td> <td>BN 0601900 (Bangladesh)</td> <td>25/6/2021</td> </tr> <tr> <td>BQ0544897 (Bangladesh)</td> <td>17/12/2021</td> </tr> <tr> <td>BP0822580 (Bangladesh)</td> <td>27/12/2021</td> </tr> <tr> <td>BQ0186176 (Bangladesh)</td> <td>22/1/2022</td> </tr> <tr> <td>BR0791757 (Bangladesh)</td> <td>18/5/2022</td> </tr> <tr> <td>06339525 (Nepal)</td> <td>31/7/2022</td> </tr> <tr> <td rowspan="4">Detas</td> <td>BR0519214 (Bangladesh)</td> <td>1/8/2022</td> </tr> <tr> <td>BW0464512 (Bangladesh)</td> <td>27/7/2022</td> </tr> <tr> <td>BT0156328 (Bangladesh)</td> <td>1/8/2022</td> </tr> <tr> <td>BP0102319 (Bangladesh)</td> <td>12/1/2022</td> </tr> <tr> <td rowspan="3">Merchong</td> <td>BP0336489 (Bangladesh)</td> <td>16/10/2021</td> </tr> <tr> <td>BK0853242 (Bangladesh)</td> <td>23/4/2021</td> </tr> <tr> <td>BR0876333 (Bangladesh)</td> <td>26/8/2021 (special pass)</td> </tr> <tr> <td></td> <td></td> <td>C8180985 (Indonesia)</td> <td>22/6/2022 (special pass)</td> </tr> </tbody> </table>	Estates	Workers' passport no.	Visit Pass (TE) expiry dates	Bukit Leelau	BN 0601900 (Bangladesh)	25/6/2021	BQ0544897 (Bangladesh)	17/12/2021	BP0822580 (Bangladesh)	27/12/2021	BQ0186176 (Bangladesh)	22/1/2022	BR0791757 (Bangladesh)	18/5/2022	06339525 (Nepal)	31/7/2022	Detas	BR0519214 (Bangladesh)	1/8/2022	BW0464512 (Bangladesh)	27/7/2022	BT0156328 (Bangladesh)	1/8/2022	BP0102319 (Bangladesh)	12/1/2022	Merchong	BP0336489 (Bangladesh)	16/10/2021	BK0853242 (Bangladesh)	23/4/2021	BR0876333 (Bangladesh)	26/8/2021 (special pass)			C8180985 (Indonesia)	22/6/2022 (special pass)	<p>Root cause:</p> <p>The existing SOP on MY EG worker permit renewal does not include all of these unforeseen issues (e.g. delay on renewal work permit and passport at embassy and immigration, late submission of passport by operating centers, application of work permit through recalibration programmed, etc.) due to inconsistency of application practice and implementation of passport and work permit renewal by relevant authorities during Covid 19 pandemic. Moreover, there are no official announcements on the changes from related authorities regarding the current changes on renewal application of passport and work permits.</p> <p>Correction:</p> <p>IOI Human Resources (HR) department will liaise with the related authorities to get update on the current information on the application of renewal on passport and work permit.</p> <p>The SOP on MY EG Foreign Worker Permit Renewal will be revised according to the current practice by taking consideration of unforeseen occurrence.</p> <p>Corrective action: <i>(The corrective action shall address the root cause of this NC)</i> An email had been distributed to all operating centers in the region on 31st October 2022 to remind and take note on the new revised SOP on MY EG Foreign workers renewal. Furthermore,</p>	<p>Root cause, correction and corrective action has been verified by the auditor.</p> <p>Reviewed the email distributed to all operating centers in the region on 31st October 2022, as a reminder ensure they are aware of the new revised SOP on MY EG Foreign workers renewal. Reviewed the monitoring form for operating centers to continuously monitor the renewal progress of workers' passport and work permits, which has been created by the Sustainability Dept.</p> <p>Status: CLOSED</p>
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			sustainability department have prepared a monitoring form for operating centers to continuously monitor the renewal progress of workers' passport and work permits.	
6.2.2	Major	<p>Finding :</p> <p>Review of payroll documents for workers of Transport Contractors (Sasaran Perentas and Pengangkutan Teo Tuan Kwee Sdn Bhd at Bukit Leelau CU found information on compensation/renumeration not adequate/detailed in the salary slips.</p> <p>Objective evidence :</p> <p>Verified Salary Slips for Johar bin Omar (employee of Sasaran Perentas) at Ladang Merchong and Bt Leelau POM and M. Jayan a/ Machap (employee of Teo Tuan Kwee SB) at Bt Leelau POM did not have the following statement and detail:</p> <ol style="list-style-type: none"> 1. Statement of output (tonnage of FFB/Oil) recorded for the workers 2. Statement on the calculation of wages not detailed (i.e. Percentage X Output X FFB/oil Prices) 3. Prevailing prices of product transported at the time of calculation not provided 	<p>Root cause:</p> <p>Sasaran Perentas and Pengangkutan Teo Tuan Kwee Sdn Bhd are paying their lorry drivers salary based on the trips and tonnage basis.</p> <p>However, the details of the wages are not included in the payslip due to limited space in the payslip and the contractor are keeping the details of trip and tonnage in different statement document. Their drivers are also aware of this practice and statement details that are being shared to each of the workers.</p> <p>Furthermore, upon request of payslip by estate / mill management, the transporters have only provided the payslip document to the office, not inclusive with the breakdown details of the payment. The estate/mill management was also found quite unfamiliar with the requirement to provide additional statement that includes all the relevant details of the payment. In normal practice, the transporter will only hand in the additional statement should it is being requested as it is highly private and confidential.</p>	<p>Root cause, correction and corrective action has been verified by the auditor.</p> <p>Training conducted and reviewed the sustainability team new checklist for contractor.</p> <p>Status: CLOSED</p>

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			<p>Correction: <i>(The correction shall address the objective evidence)</i> The transporters have provided their lorry drivers' payslip with detailed statements of the salary starts from the month of September.</p> <p>Corrective action: <i>(The corrective action shall address the root cause of this NC)</i> Sustainability team have conducted training dated on 21/10/2022 for sustainability staff and Assistant Manager in Bukit Leelau Region on contractors' documentation to ensure that they comply with sustainability and legal requirements. Furthermore, sustainability team have created a checklist for contractor -document to continue monitoring contractor documents continuously.</p>	
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ATTACHMENT 5

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Verification Statement by Auditors																																																														
2.1.1 RZ 03 2021	Major	<p>Requirement : Indicator 2.1.1 (C) The unit of certification complies with applicable legal requirements.</p> <p>Finding: The Visit Pass (Temporary Employment) of several actively employed workers within the Bukit Leelau Certification Unit have expired which contravenes the requirements of the Immigration Act 1959/63 and the requirement for Special Passes as contained in the FAQs issued by the Foreign Workers Division, Immigration Department of Malaysia as of 10 July 2020.</p> <p>Objective evidence : The following workers are currently employed in Bukit Leelau CU with neither of the following documents:</p> <p>a. A valid Visit Pass (Temporary Employment) as per the requirements of Section 55B of the Immigration Act 1959/63; nor</p> <p>b. A Special Pass under Regulation 14(3) of the Malaysian Immigration Regulations, also contained in the FAQs issued by the Foreign Workers Division, Immigration Department of Malaysia as of 10 July 2020 to cater for the Covid-19 Movement Control Order.</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Workers' passport number</th> <th>Expiry of Visit Pass (Temporary Employment)</th> </tr> </thead> <tbody> <tr> <td rowspan="4">Merchong</td> <td>BN0493636</td> <td>9 June 2021</td> </tr> <tr> <td>BN0452427</td> <td>9 June 2021</td> </tr> <tr> <td>BM0784120</td> <td>12 June 2021</td> </tr> <tr> <td>BN0025077</td> <td>12 June 2021</td> </tr> </tbody> </table>	Estate	Workers' passport number	Expiry of Visit Pass (Temporary Employment)	Merchong	BN0493636	9 June 2021	BN0452427	9 June 2021	BM0784120	12 June 2021	BN0025077	12 June 2021	<p>During the previous surveillance audit, a major Non-Compliance was raised when Visit Pass (Temporary Employment) of several actively employed workers within the Bukit Leelau Certification Unit have expired. This contravened the requirements of the Immigration Act 1959/63 and the requirement for Special Passes as contained in the FAQs issued by the Foreign Workers Division, Immigration Department of Malaysia as of 10 July 2020. During this Surveillance Audit, further verifications were done to ensure the consistent implementation of the Corrective Actions. Based on interviews and documentation reviews, evidence was available that foreign workers sampled below have valid Visit Pass (Temporary Employment). Foreign workers whose passports are pending renewal at the embassies/high commissions are issued with special passes by the Malaysian Immigration Department. The workers sampled were as follows:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Workers' passport number</th> <th>Visit Pass (Temporary Employment) validity</th> </tr> </thead> <tbody> <tr> <td rowspan="7">Merchong</td> <td>EF0946302</td> <td>31/5/2023</td> </tr> <tr> <td>EJ0363770</td> <td>25/5/2023</td> </tr> <tr> <td>EJ0981466</td> <td>25/6/2023</td> </tr> <tr> <td>EJ0981166</td> <td>12/11/2022</td> </tr> <tr> <td>C5740613</td> <td>13/5/2023</td> </tr> <tr> <td>AM029702</td> <td>5/8/2023</td> </tr> <tr> <td>C7523936</td> <td>29/3/2023</td> </tr> <tr> <td rowspan="7">Mekassar</td> <td>U0349448</td> <td>8/4/2023</td> </tr> <tr> <td>BW005986</td> <td>21/11/2022</td> </tr> <tr> <td>BW0399410</td> <td>21/11/2022</td> </tr> <tr> <td>T8266661</td> <td>3/9/2022</td> </tr> <tr> <td>EA0157889</td> <td>6/5/2023</td> </tr> <tr> <td>ER0157889</td> <td>6/5/2023</td> </tr> <tr> <td>C5624359</td> <td>9/3/2023</td> </tr> <tr> <td rowspan="5">Detas</td> <td>AU530934</td> <td>2/8/2023</td> </tr> <tr> <td>AT654800</td> <td>6/11/2022</td> </tr> <tr> <td>BH0673743</td> <td>13/1/2023</td> </tr> <tr> <td>BR0580928</td> <td>14/1/2023</td> </tr> <tr> <td>BP0102319</td> <td>15/1/2023</td> </tr> <tr> <td></td> <td>EJ0637844</td> <td>25/6/2023</td> </tr> <tr> <td></td> <td>EH0845420</td> <td>23/4/2023</td> </tr> </tbody> </table>	Estate	Workers' passport number	Visit Pass (Temporary Employment) validity	Merchong	EF0946302	31/5/2023	EJ0363770	25/5/2023	EJ0981466	25/6/2023	EJ0981166	12/11/2022	C5740613	13/5/2023	AM029702	5/8/2023	C7523936	29/3/2023	Mekassar	U0349448	8/4/2023	BW005986	21/11/2022	BW0399410	21/11/2022	T8266661	3/9/2022	EA0157889	6/5/2023	ER0157889	6/5/2023	C5624359	9/3/2023	Detas	AU530934	2/8/2023	AT654800	6/11/2022	BH0673743	13/1/2023	BR0580928	14/1/2023	BP0102319	15/1/2023		EJ0637844	25/6/2023		EH0845420	23/4/2023
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3.3.2 RZ 04 2021	Minor	<p>Requirement: 3.3.2 A mechanism to check consistent implementation of procedures is in place.</p> <p>Finding: There is no mechanism to check the consistent implementation of:</p> <ol style="list-style-type: none"> IOI Group's Home Hygiene and Cleanliness Procedures (SOP); Memorandum from the Human Resources Manager on reimbursement of medical check-up and immigration security clearance costs for the newly arrived Nepalese workers in their first month salary; and Meeting minutes between Laukin A Estate and sundry shop owner on the storing and selling of LPG at the shop. 	<p>During the previous surveillance audit, a Minor Non-Compliance No. RZ 04 of 2021 was raised where there were no consistent implementation of the following:</p> <ol style="list-style-type: none"> IOI Group's Home Hygiene and Cleanliness Procedures (SOP); Memorandum from the Human Resources Manager on reimbursement of medical check-up and immigration security clearance costs for the newly arrived Nepalese workers; and Meeting minutes between Laukin A Estate and sundry shop owner on the storing and selling of LPG at the shop. <p>During this surveillance audit, it was verified that Bukit Leelau CU was not able to demonstrate that there is consistent implementation of its own SIA Management Action Plans & Continuous Improvement Plans. The objective evidences were:</p> <ol style="list-style-type: none"> The SIA Management Action Plans & Continuous Improvement Plans of Detas, Mekassar and Merchong Estates (reviewed on 18/8/2022) had specified that: <ol style="list-style-type: none"> Visiting Medical Officer (VMO) will visit the estate clinics once every 2 weeks. However, the VMO's visits were as follows: 																																																																																																

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Objective Evidence:

1. The IOI Group's Home Hygiene and Cleanliness Procedures prohibits against modifying or altering water pipe connections without permission from the management, and storing diesel/petrol at the house. Despite training given on the SOP, random checks carried out by the Health Assistants, and displaying the SOP at the linesite, the following were observed:
 -At Detas Estate, water pipe behind house No. C1 had modified the water pipe connections without management's approval.
 -At Leepang A Estate, petrol was found kept in a jerry can inside a worker's bedroom in house No. C2.

2. As per memorandum dated 7 Feb 2020 from Manager Human Resources, instructions were given to all Operating Centres to reimburse RM365 to newly-arrived Nepali workers for medical check-up and immigration security clearance costs in their first month salary, However, the following Nepali workers at Merchong Estate received their reimbursements several months later. Details are as follows:

Estate	Workers' passport number	Arrival	Actual reimbursement
Merchong	09941767	28 Jan 2020	May 2020
	11785535	7 Feb 2020	May 2020
	08175550	28 Jan 2020	May 2020
	11795651	25 Feb 2020	May 2020
	07906026	25 Feb 2020	May 2020
	11659748	25 Feb 2020	May 2020
	06192634	17 Jan 2020	May 2020
	11299726	28 Jan 2020	May 2020
	10627306	25 Feb 2020	May

- At Detas Estate: once a month i.e., 24/6/2022, 27/7/2022, 2/8/2022.
- At Mekassar Estate: once a month i.e., 20/4/2022, 18/5/2022, 15/6/2022, 20/7/2022, 18/8/2022.
- At Merchong Estate once a month i.e., 20/4/2022, 18/5/2022, 22/6/2022, 20/7/2022, 18/8/2022.

4. Each estate is to carry out a price comparison of items sold between estate shops and shops outside the estate. However, this was either not carried out adequately or at all.
- Detas Estate inadequately compared only the prices of eggs, chicken, sugar and cooking oil.
 - Mekassar Estate could not demonstrate that price comparison was carried out.

Although this is a Minor Non-Compliance, it has been upgraded to a Major Non-Compliance No. RZ 01 of 2022 because it is a repeat Minor Non-Compliance from the preceding surveillance audit.

Status: Upgraded from minor to major

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				2020	
			11659787	25 Feb 2020	May 2020
			05852604	17 Jan 2020	May 2020
3.4.2 MAR 01 2021	Minor	<p>Requirement :</p> <p>3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>Finding :</p> <p>The social impact assessment undertaken is not involving the affected stakeholders and including the impacts of any outgrower and not documented.</p> <p>Objective evidence :</p> <p>1. Detas Estate - SIA reviewed on September 2021 not included on encroachment by Felde Lepar Hilir 5 and prices at sundry shop (including the price differences between estate and outside shop).</p> <p>2. Merchong Estate, Mekassar Estate and Leepang A Estate – SIA reviewed on September 2021 not included on the Covid 19 impact to the employees, including the leave for them to go back to their origin country.</p> <p>3. Mekassar Estate – SIA reviewed on September 2021 not included on the impact of the Finnwatch report regarding overtime issues that have been claimed by the workers since Jun 2019. Interview has been made between the auditors, management and respective workers also his younger brother via WhatsApp video call, hence the solution for both parties yet to resolved.</p> <p>4. SIA reviewed on September 2021 - Merchong Estate, Bukit Leelau Estate, Leepang A Estate on contract substitution. This happen to the Indian, Bangladeshi and Nepal workers at respective estates. The issues is tantamount to contract substitution as defined under Annex 1 of the RSPO MYNI 2021.</p>	<p>It was verified during this surveillance audit, that the previous Minor Non-Compliance has been satisfactorily closed with the evidence that the SIA Monitoring and Action Plans have been carried out with the participation of the affected parties. Price comparisons between outside shops and estate shops have been carried out. Sampled were price comparisons done by Bukit Leelau Estate and Merchong Estate.</p> <p>The SIA had also recorded the discussions with workers of all operating units the impacts of Covid-19 on them and on their return to their countries of origin. Consultations were also recorded via JCC meetings and briefings done to workers on contract substitution, as well as their overtime and wage calculations. These warried out at Mekassar Estate (28/5/2022), Detas Estate (12/8/2022, 11/8/2022) Merchong Estate (18/6/2022, 14/7/2022), Bukit Leelau Estate (23/7/2022), Bukit Leelau Mill (15/8/2022, 5/8/2022).</p> <p>Based on the above, the Minor Non-Compliance No. MAR 01 2021 has been satisfactorily closed.</p> <p>Status: CLOSED</p>		

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<p>3.4.3 MAR 02 2021</p>	<p>Major3</p>	<p>Requirement : 3.4.3: The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>Finding : Social monitoring plans not reviewed and updated in a participatory way.</p> <p>Objective evidence : 1.Detas Estate - SIA action plans reviewed on September 2021 not included on encroachment by Felda Lepar Hilir 5 and prices at sundry shop (including the price differences between estate and outside shop). 2.Merchong Estate, Mekassar Estate and Leepang A Estate – SIA action plans reviewed on September 2021 not included on the Covid 19 impact to the employees, including the leave for them to go back to their origin country. 3.Mekassar Estate – SIA action plans reviewed on September 2021 not included on the impact of the Finnwatch report regarding overtime issues that have been claimed by the workers since Jun 2019. Interview has been made between the auditors, management and respective workers also his younger brother via whatsapp video call, hence the solution for both parties yet to resolved. 4.Merchong Estate, Bukit Leelau Estate, Leepang A Estate - SIA action plans reviewed on September 2021 – not included on contract substitution. This happen to the Indian, Bangladeshi and Nepal workers at respective estates. The issues is tantamount to contract substitution as defined under Annex 1 of the RSPO MYNI 2021.</p>	<p>Sighted an evidence all the issues has been include in the SIA Action plan such as:</p> <p><u>Detas Estate</u></p> <ul style="list-style-type: none"> • Chronology of land encroachment between IOI and Felda Lepar Hilir 5 • Sighted an evidence GIS team conducted survey related to land encroachment on 05/02/2020 • Sighted involvement from Felda Lepar Hilir 5 to review and joined to check boundary has been claimed by IOI on 12/07/2019 • Sighted the minute meeting between the workers’ representatives, canteen operator and management on 8/6/2021 <p><u>Merchong Estate, Mekassar Estate and Leepang A Estate</u></p> <ul style="list-style-type: none"> • Leepang A Estate management had arranged a meeting with the related workers to discuss this matter in details on 11/09/2021. The workers were encouraged to continue working until the flight tickets has confirmed by the headquarters. • The workers were encouraged to continue working until the flight tickets has confirmed by the headquarters. • The estate management had a meeting with the relevant workers on 07/08/2021 and encourage them to work until the flight tickets were confirmed by the headquarters. <p><u>Mekassar Estate</u></p> <ul style="list-style-type: none"> • Workers whom planned to return back to their country of origin during the Covid-19 pandemic facing this issue. <p>However, the estate management had arranged to have a meeting with all the relevant workers to explain and advised them to continue working until the flight tickets were confirmed by the headquarters.</p> <ul style="list-style-type: none"> • Sighted all the evidence form has established an implement for monitored minimum wages & OT has been recorded and meet such as OT request form (signed by workers and “Workers Work Verification” form <p>Status: Closed.</p>
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<p>6.2.4 RZ 01 2021</p>	<p>Major</p>	<p>Requirement: 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.</p> <p>Finding: Workers' housing conditions are not in accordance with the requirements of the Employees' Minimum Standard of Housing, Accommodation and Amenities Act 1990 (the EMSHAA Act)</p> <p>Objective evidence: Section 6(1) (c) of the EMSHAA Act requires the management to ensure that the buildings are kept in a good state of repair and painted to present a satisfactory appearance.</p> <p>1. Sighted at Detas Estate workers' housing as follows: <ul style="list-style-type: none"> - Houses No. C5, C6 and E7 had graffiti painted on the front door, inner and outer walls. - House No. B6's back door was flimsy and in a poor state of disrepair and the front door has no knob. </p> <p>2. The foreign workers' houses at Mekassar, and Bukit Leelau Estates either do not have any flushing mechanism, or the flushing mechanism is not working.</p> <p>All the above are evidence that the workers' houses were not kept in a good state of repair and not painted to present a satisfactory appearance.</p>	<p>In the previous surveillance audit, a Major Non-Compliance was raised where it was found that the workers' housing conditions were not in accordance with the requirements of the Employees' Minimum Standard of Housing, Accommodation and Amenities Act 1990 (the EMSHAA Act). Based on the above, worker interviews, site visits during the audit and review of documents, evidence was available that the corrective actions have been consistently implemented throughout Bukit Leelau CU.</p> <p>Therefore, Major Non-Compliance No. RZ 01 of 2021 has been satisfactorily closed. Status: Closed.</p>
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<p>6.6.1 RZ 02 2021</p>	<p>Major</p>	<p>Requirement: 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. <p>Finding: Workers from India, Bangladesh and Nepal had been given inaccurate information during the briefing in their home countries by the agents and/or agents' representatives. This include wages, working conditions, and workers not knowing their exact terms of employment contract before leaving their countries.</p> <p>Objective Evidence: Indian, Bangladeshi and Nepali workers (at Merchong, and Bukit Leelau) and Bangladeshi and Indian workers (at Leepang A Estate) stated that they were misrepresented by the agents and/or agents' representatives in their home countries, and that they had relied on the misrepresentations to agree to the job offer in Malaysia. Examples of misrepresentations they received were as follows:</p> <ul style="list-style-type: none"> a. One Indian worker in Leepang A Estate said that before he paid his agent, he was told that he would be working in an oil packing plant. b. Indian workers from Merchong and Bukit Leelau Estates said before they paid the agent, they were told that they would be doing light work such as watering, weeding and manuring at oil palm 	<p>All units within Bukit Leelau CU were able to demonstrate that all sampled workers have entered into employment voluntarily. All workers (general workers, harvesters, sprayers, manurers, etc), have not been subjected to contract substitution and no discriminatory practices against foreign workers was observed.</p> <ul style="list-style-type: none"> a) employment contracts contain mutually agreed termination clause; b) all foreign workers now keep their own passports at their own houses in a safe locker. c) no recruitment fee is payable by foreign workers. This was confirmed by the workers and evidenced by the review of June 2022 payslips of 4 newly-arrived Nepali workers who were reimbursed RM450 each; d) records of attendance and workers confirmation that overtime work is mutually agreeable and not forced on them; e) confirmation from the foreign workers that they received accurate briefing in their home country on the job they would be doing in Malaysia; f) and confirmation from the workers that there is no debt bondage or withholding of wages. <p>Therefore, Major Non-Compliance No. RZ 02 of 2021 has been satisfactorily closed.</p> <p>Status : CLOSED</p>
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		<p>nurseries.</p> <p>c. Indian, Bangladeshi and Nepali workers (at Merchong and Bukit Leelau Estates), and Bangladeshi and Indian workers (at Leepang Estate) said that they were told by the agents/agents' representatives that they would be doing light work of manuring, watering and weeding at flower nurseries.</p> <p>d. Some Indian and Nepal workers (Merchong Estate) said that the agent/agent's representative had inaccurately informed them a higher wage than what was eventually paid when they arrived in Malaysia.</p> <p>e. Some Bangladeshi workers (Leepang A Estate) said they were not shown any video before they left their country and so they were not adequately briefed of the work they are supposed to do in Malaysia.</p> <p>f. All the workers said they were not given time to read the agreements they signed in their home country, not given a copy of the same, and therefore were not completely aware of their terms of employment, rights, entitlements, obligations, etc before they left their home countries.</p> <p>The agents and/or agent representatives were named as follows: India: "Iqbal", "Imtiyaz", "Tanveer", "Neeraj", "Wazir". Nepal: "SAARC Overseas Pvt Ltd", "Relation Employment Service Pte Ltd", "Adesh Serasthaa" Bangladesh: "Al Islam Overseas"</p> <p>All the above is tantamount to contract substitution as defined under Annex 1 of the RSPO MYNI 2021. Annex 1 of the RSPO MYNI 2021 defines contract substitution as "The practice of substituting or</p>	
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		changing the terms of employment to which the worker originally agreed, either in writing or verbally, which results in worse conditions or less benefits. Changes to the employment agreement or contract are prohibited unless these changes are made to meet local law and provide equal or better terms".	
7.7.2 DA 01 2021	Minor	<p>Requirement: Indicator 7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>Finding: Updated or amended areas of peat inventory was not reported yet to RSPO Secretariat.</p> <p>Objective evidence: Peat inventory was sent to RSPO Secretariat on 22/07/2020 for Bukit Leelau Estate @ 89.63 ha. Based on soil maps prepared by GIS Department, IOI Research Centre revised dated April 2020 at Bukit Leelau Estate, the peat soil planted was amended from 89.63 ha to 98.63 ha. During the audit process, Bukit Leelau Estate yet to be updated or reported to the RSPO Secretariat with new amended of the peat planted area @ 98.63 ha.</p>	<p>Areas of peat within Bukit Leelau CU were appropriately inventoried, documented and reported to RSPO Secretariat. The updated and amended areas of peat in field PM98A in Bukit Leelau Estate which is 98.63 ha were appropriately inventoried, documented and reported to RSPO Secretariat on 19th October,2021. Hence, <i>NCR DA 02 2021</i> was satisfactorily closed.</p> <p>Status: CLOSED</p>

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ATTACHMENT 6 – Timebound Plan

Details of Time Bound Plan as submitted by IOI Plantation Services Sdn Bhd (30/06/2022)

No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units , Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
1.	Pamol (Sabah) POM, Sabah	Meliau, Nangoh, Rungus, Tindakon, Ulu, Sugut & Bayok	May 2008	Re-Certified in November 2016	ASA-04 audit completed in July 2020	No outstanding issues
2.	Sakilan POM	Sakilan, Linbar 1 and Linbar 2	Nov 2008	Re-Certified in Mar 2020	ASA-01: 30 % remote audit completed in November 2020. 70% onsite audit completed in March 2021.	No outstanding issues
3.	Pamol Kluang POM	Pamol Timur, Pamol Barat, Mamor, Unijaya, Kahang and Swee Lam	Mar 2009	Re-Certified in Apr 2020	ASA-01 audit completed in November 2020	No outstanding issues
4.	Gomali POM	Gomali, Paya Lang, Bahau, Bertam, Bukit Dinding, Kuala Jelai, Tambang, Regent, Sagil, Jasin Lalang and Sembilan Tani (Associated Outgrower)	Aug 2009	Re-Certified in Aug 2015	Recertification audit completed in July 2020	No outstanding issues
5.	Baturong POM	Baturong 1, Baturong 2, Baturong 3 and Cantawan	Sept 2009	Re-Certified in Oct 2015	Recertification audit completed in August 2020	No outstanding issues
6.	Bukit Leelau POM	Bukit Leelau, Detas, Merchong, Mekassar, Leepang A and Laukin A	Apr 2010	Re-Certified in Nov 2015	Recertification audit completed in September 2020	No outstanding issues
7.	Mayvin POM	Mayvin 1, Mayvin 2, Mayvin 5, Mayvin 6 and Tangkulap	Aug 2010	Re-Certified in Dec 2015	Recertification audit completed in August 2020	No outstanding issues

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8.	Pukin POM, Pahang	Pukin, Shahzan 1, Shahzan 2, Segamat and Bukit Serampang	Dec 2010	Re-certified in June 2016	Recertification audit completed in March 2021	No outstanding issues
9.	Leepang (Sabah) POM	Morisem 5, Leepang 1, Leepang 5, Permodalan 1, Permodalan 2, Permodalan 3, and Permodalan 4	Aug 2012	Re-certified in December 2018	ASA-02 audit completed in September 2020	No outstanding issues.
10.	Syarimo POM	Syarimo 1, Syarimo 2, Syarimo 3, Syarimo 4, Syarimo 5, Syarimo 6, Syarimo 7, Syarimo 8 and Syarimo 9	Sept 2012	Re-certified in Mar 2018	ASA-03: 30 % remote audit conducted in January 2021. 70% onsite audit completed in April 2021.	No outstanding issues
11.	Ladang Sabah POM	Moynod, Luangmanis, Terusan Baru, Sungai Sapi, Laukin, Labuk, Bimbingan 1, and Bimbingan 2	Oct 2012	Re-certified in July 2018	ASA-03: 30 % remote audit conducted in January 2021. 70% onsite audit completed in March 2021.	No outstanding issues
12.	Morisem POM, Sabah	Morisem 1, Morisem 2, Morisem 3, Morisem 4, Leepang 2, Leepang 3, and Leepang 4	Sept 2013	Re-certified in December 2018	ASA-02: 30 % remote audit completed in November 2020. 70% onsite audit completed in April 2021.	No outstanding issues
13.	Unico POM-1, Sabah	Unico 6, Ladang Asas (Tas & Halusah), 31 (Outgrowers & Smallholders)	Planned - 2018	Certified in July 2018	ASA-03 audit completed in April 2021.	In the process of closing Nonconformities Outgrowers and Smallholders are not part of the certified area
14.	Unico Desa POM-2, Sabah	Unico 1, Unico 2, Unico 3, Unico 4, Unico 5 and 17 (Outgrowers & Smallholders)	Dec 2017	Certified in May 2018	ASA-03 audit completed in March 2021..	No outstanding issues Outgrowers and Smallholders are not part of the certified area

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15.	IOI – Pelita, Sarawak	Sejap and Tegai	Planned – TBC as it is under the resolution process	Uncertified Unit	IOI – Pelita (Sarawak) is in the resolution process (under RSPO CP)	<p>CICOM completed the Capacity Building Program at the end of June 2019.</p> <p>Currently, with input from all stakeholders, including the State of Sarawak Government, IOI is evaluating options in regards to the surveyors to be involved in the Community Participatory Mapping.</p> <p>Further and updated progress of this issue could be access through the link below;</p> <ul style="list-style-type: none"> (a) IOI Pelita Land Dispute Resolution Plan (b) Current progress on IOI Pelita Land Dispute Resolution Process (c) https://www.ioigroup.com/Content/MEDIA/M_Media?Category=7 (d) RSPO Case Tracker – IOI Pelita Status of Complaints <p>Handing over of the ex-gratia payment ceremony has been conducted on 5th September 2019 in Miri involving members from 4 main communities respectively. Second stage of the Resolution Plan, 3D Community Participatory Mapping, started in August 2019. Technical assistance to the affected communities is being provided by CICOM. By mid-March 2020, six out of nine affected communities had their surveys done. Unfortunately, at that point, the coronavirus outbreak reached Sarawak and the government issued Movement Control Order. The Community Participatory Mapping had to be put on hold.</p>
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16.	PT SKS, Indonesi a	SKS 1, SKS 2, and SKS 3	Planned - 2021	Uncertified Unit	<p>RSPO Stage 1 was conducted in September 2019</p> <p>RSPO Complaints Panel (CP) has officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development. First and Second quarterly update for the action plan on PT. SKS, PT. BNS and PT. BSS was submitted to RSPO Investigate and Monitoring Unit in December 2018 and February 2019 respectively.</p> <p>On 15th April 2019, RSPO's official announced "that the monitoring of the implementation of the Complaints Panel directives for "PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No: GR-000882 " is now officially closed."</p> <p>IOI received an email from RSPO that "the Investigation & Monitoring Unit (IMU) of the RSPO Secretariat had finalized the internal review of the action plan and progress reports submitted by IOI against the Complaints Panel's directives and the IMU concluded that IOI has successfully met all the requirements set by the Complaints Panel."</p> <p>Further and updated progress of this issue could be access through the link below;</p> <p>(a) RSPO Ketapang Complaint for PT BSS, PT SKS & PT BNS</p> <p>(b) RSPO Case Tracker – PT BSS, PT SKS & PT. BNS Status of Complaints</p> <p>(c) RSPO Post-Complaints Monitoring</p> <p>The Stage 1 of RSPO P&C audit was conducted on 9th – 12th September 2019 by BSI</p> <p>Due to the pandemic issue, certification preparation was affected such HGU process and as well as on ground preparation. Hence, the main assessment audit expected to be conducted in year 2021.</p>
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17.	PT BNS, Indonesia	BNS 1, BNS 2, BNS 3 and BNS 4	Planned - 2021	Uncertified Unit	<p>RSPO Stage 1 audit was conducted in September 2019</p> <p>RSPO Complaints Panel (CP) has officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development. First and Second quarterly update for the action plan on PT. SKS, PT. BNS and PT. BSS was submitted to RSPO Investigate and Monitoring Unit in December 2018 and February 2019 respectively.</p> <p>On 15th April 2019, RSPO's official announced "that the monitoring of the implementation of the Complaints Panel directives for "PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No: GR-000882 " is now officially closed."</p> <p>IOI received an email from RSPO that "the Investigation & Monitoring Unit (IMU) of the RSPO Secretariat had finalized the internal review of the action plan and progress reports submitted by IOI against the Complaints Panel's directives and the IMU concluded that IOI has successfully met all the requirements set by the Complaints Panel."</p> <p>Further and updated progress of this issue could be access through the link below;</p> <ul style="list-style-type: none"> a) RSPO Ketapang Complaint for PT BSS, PT SKS & PT BNS b) RSPO Case Tracker – PT BSS, PT SKS & PT. BNS Status of Complaints c) RSPO Post-Complaints Monitoring <p>The Stage 1 of RSPO P&C audit was conducted on 9th – 12th September 2019 by BSI</p> <p>Due to the pandemic issue, certification preparation was affected such as HGU process and as well as on ground preparation. Hence, the main assessment audit expected to be conducted in year 2021.</p>
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18.	PT BSS, Indonesi a	BSS 1, BSS 2, BSS 3 and BSS 4	Planned - 2021	Uncertified Unit	<p>RSPO Stage 1 was conducted in September 2019</p> <p>RSPO Complaints Panel (CP) has officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development. First and Second quarterly update for the action plan on PT. SKS, PT. BNS and PT. BSS was submitted to RSPO Investigate and Monitoring Unit in December 2018 and February 2019 respectively.</p> <p>On 15th April 2019, RSPO's official announced "that the monitoring of the implementation of the Complaints Panel directives for "PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No: GR-000882 " is now officially closed."</p> <p>IOI received an email from RSPO that "the Investigation & Monitoring Unit (IMU) of the RSPO Secretariat had finalized the internal review of the action plan and progress reports submitted by IOI against the Complaints Panel's directives and the IMU concluded that IOI has successfully met all the requirements set by the Complaints Panel."</p> <p>Further and updated progress of this issue could be access through the link below;</p> <p>a) RSPO Ketapang Complaint for PT BSS, PT SKS & PT BNS</p> <p>b) RSPO Case Tracker – PT BSS, PT SKS & PT. BNS Status of Complaints</p> <p>c) RSPO Post-Complaints Monitoring</p> <p>The Stage 1 of RSPO P&C audit was conducted on 9th – 12th September 2019 by BSI</p> <p>Due to the pandemic issue, certification preparation was affected such HGU process and as well as on ground preparation. Hence, the main assessment audit expected to be conducted in year 2021.</p>
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19.	PT KPAM, Indonesia	Under Development	Planned - 2023	Uncertified Unit	<p>NPP and HCSA was approved in April 2018. Currently under development.</p> <p>RSPO has approved PT.KPAM NPP Summary Report and was published in RSPO website for public notification on 13 April 2018. The NPP public notification could be assessed through the link below:</p> <p>https://rspo.org/certification/new-planting-procedure/publicconsultations/page/2?</p> <p>HCSA Peer Review Assessment completed on 14 May 2018. The HCSA Peer Review Report and Summary Report could be assessed through the link below:</p> <p>http://highcarbonstock.org/wp-content/uploads/2018/05/PRR-PT.KPAM.pdf</p> <p>The Stage 1 of RSPO P&C audit was conducted on 9th – 12th September 2019 by BSI</p> <p>Due to the pandemic issue, certification preparation was affected such HGU process and as well as on ground preparation. Hence, the main assessment audit expected to be conducted in year 2021</p>
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