



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 : 21-25/08/2023

DURATION : 22 auditor days

TYPE OF AUDIT :

☒ **Annual Surveillance Audit No. 3**

☐ **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

Name : **ROZAIMEE BIN AB RAHMAN**

Signature :

Date : **1/12/2023**

Acknowledgement by Client's Representative

Name : **MOHAMAD ZULKARNAIN BIN ZUBIR AHMADI**

Signature :

Date : **06/12/2023**

RSPO PUBLIC SUMMARY

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 |
| | | / | | / |
| | | Contract workers | Local & National NGOs | Govt. agency / Statutory bodies |
| | | / | / | / |
| | | 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: | 23 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 |
| | | / | | / |
| | | Contract workers | Local & National NGOs | Govt. agency / Statutory bodies |
| | | / | / | / |
| | | 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 | |

RSPO PUBLIC SUMMARY

| Surveillance 2 Audit | | | | |
|--|---|---|--------------------------------|---------------------------------|
| On-site audit date | : | 22-25 August 2022 | No. of auditor days: | 23 |
| Audit team | : | Mohd Ab Raouf bin Asis (LA), Rozaimie 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. Sooriamorthy | Approval date : 5/12/2022 | |

| Annual Surveillance Audit 3 | | | | |
|---|---|--|--------------------------------|---------------------------------|
| On-site audit date | : | 21-25/08/2023 | No. of auditor days : | 22 days |
| Audit team | : | Rozaimie Bin Ab Rahman, Selvasingam T Kandiah, Dzulfiqar Azmi, Rahayu Zulkifli, Ismail Adnan | | |
| No. of major NCR | : | 1 | Indicator: 6.5.1 | Closing date: 24/11/2023 |
| No. of minor NCR | : | 3 | Indicator: 3.3.3, 3.5.2, 6.5.4 | |
| Indicate by ticking the stakeholders interviewed during the on-site audit | : | Employees / Workers organizations | Settlers | Villagers / Local communities |
| | : | / | NA | / |
| | : | Contract workers | Local & National NGOs | Govt. agency / Statutory bodies |
| | : | / | / | / |
| | : | Indigenous people | Contractor | Others (Please specify) |
| Supply base sampled : Bukit Leelau POM, Bukit Leelau Estate, Laukin A Estate, Mekassar Estate, Merchong Estate. | | | | |
| Changes since the last audit | : | NA | | |
| 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 | : | - | | |
| Report approved by | : | Kamini Sooriamorthy | Approval date : 1/12/2023 | |

RSPO PUBLIC SUMMARY

SUMMARY OF INFORMATION

TABLE 1

| | STAGE 2 / RA | ASA 1 | ASA 2 | ASA 3 | ASA 4 |
|---------------------------------------|--|----------------------|----------------------|----------------------|-------|
| Projection Period / Reporting Period* | Aug 2020 – July 2021 | Aug 2021 – July 2022 | Aug 2022 – July 2023 | Aug 2023 – July 2024 | |
| Certified FFB Processed (MT) | 232,240.00 | 249,828.00 | 211,090.00 | 218,710.00 | |
| Production of Certified CPO (MT) | 54,810.43 | 54,810.43 | 50,659.00 | 52,499.00 | |
| Production of Certified PK (MT) | 10,563.59 | 10,563.59 | 8,971.33 | 9,287.00 | |
| | | | | | |
| Certified Areas (Ha) | 11,489.17 | *11,507.27 | **9,178.49 | 9,178.49 | |
| Planted Areas (Ha) | 9,726.00 | *,730.00 | **7,901.00 | 7,901.00 | |
| Production Areas (Ha) | 9,247.00 | 9,542.00 | 7,897.00 | 7,897.00 | |
| HCV Areas / Conservation Areas (Ha) | 29.43 | *29.63 | **25.27 | ***25.22 | |
| REMARKS | <p>*ASA1-2021: Updates in certified & planted area due to the changes in Detas & Merchong Estate reported area. Detas Estate 1. Total planted increase 4ha replanting oil palm due to the returning off the encroached area by Felda Lepar Hilir (with road adjustment). 2. HCV increased 0.2ha of river area (GIS remapping). Merchong Estate 1) Certified area increases to 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.</p> <p>**ASA2-2022: Leepang Estate Leepang Estate had been transferred to Pukin CU grouping. The HCV areas were also transferred to Pukin CU</p> <p>***ASA 3 – 2023: Mekassar Estate 1. HCV area with variance 0.02ha of pond due to some area change description to water treatment plan (GIS mapping). Detas Estate 1. HCV area with variance 0.03ha of river area (GIS mapping).</p> | | | | |

TABLE 2

| | PO | PK |
|---|-----------|----------|
| **Last years certified volume (MT) | 50,659.00 | 8,971.33 |
| Last years actual certified sold (MT) | 23,753.51 | 4,965.42 |
| Last years actual sold under other schemes (MT) | - | - |
| Last years sold conventional (MT) | - | - |
| Last year actual sold CSPO credits (where applicable) | - | - |
| New year certified volume (MT) | 52,499.00 | 9,287.00 |

| Table of contents | Page |
|---|-------------|
| 1.0 AUDIT PROCESS | 6 |
| 1.1 Certification body | 6 |
| 1.2 Qualification of audit team | 6 |
| 1.3 Audit methodology | 7 |
| 1.4 Stakeholder consultation | 7 |
| 1.5 Audit plan | 7 |
| 1.6 Date of next audit | 7 |
| 2.0 SCOPE OF CERTIFICATION AUDIT | 10 |
| 2.1 Description of the certification unit | 10 |
| 2.2 Description of the Supply Base (including planting profile) | 10 |
| 2.3 Organization Information / Contact Person(s) | 13 |
| 3.0 AUDIT FINDINGS | |
| 3.1 Changes to certified products in accordance to the production of the previous year | 13 |
| 3.2 Progress and changes in time bound plan | 13 |
| 3.3. Other changes (e.g. organizational structure, new contact person, addresses, etc.) | 13 |
| 3.4 Status of previous non-conformities * (refer to Attachment 5) | 14 |
| 3.5 Complaint received from stakeholder (if any) | 14 |
| 4.0 DETAILS OF NON-CONFORMITY REPORT | |
| 4.1 For P&C (refer to Attachment 3) | 14 |
| 4.2 For SC (refer to Attachment 3 – Supply Chain Requirements for Mills) | |
| 5.0 AUDIT CONCLUSION | 14 |
| 6.0 RECOMMENDATION | 15 |
| List of Attachment | |
| Attachment 1 : Map of CU | 16 |
| Attachment 2 : RSPO Audit Plan | 18 |
| Attachment 3 RSPO P&C Audit Checklist and Findings | 26 |
| Attachment 4 : Details of Non-conformities and Corrective Actions Taken | 98 |
| Attachment 5 : Status of Non-conformities Previously Identified | 105 |
| Attachment 6 : Time-bound Plan | 107 |

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 |
|------------------------------|--------------------------------|---|
| Rozaimie bin Ab Rahman | Lead Auditor, TBP, SCCS, GHG | 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. |
| Dzulfiqar bin Azmi | Auditor, Safety & environment | Holds a B. Sc. in Agriculture from University Teknologi Malaysia (UiTM). He had more than 5 years of working experience in the oil palm operation. He starts auditing in the sustainable scheme since 2018 and has successfully passed the RSPO Lead Auditor and ISO Integrated Management System lead assessor course in 2018. |
| Ismail Adnan bin Abdul Malek | 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, RSPO and MSPO Auditor at the Food, Agriculture and Forestry, SIRIM QAS International Sdn Bhd, since 2016. |
| Selvasingam T. Kandiah | Auditor, GAP, safety | Holds a B.Sc. (Hons) of Agriculture University of Agricultural Sciences, Hebbal, Bangalore, India. He had more than 29 years of working experience in plantation management covering cocoa, rubber and oil palm. He is a qualified RSPO P & C and MSOP Lead Auditor. |

RSPO PUBLIC SUMMARY

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 supply base covered during the audit are Bukit Leelau Estate, Merchong Estate, Mekassar Estate, and Laukin A 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>Workers from Bukit Leelau CU confirmed the following:</p> <ul style="list-style-type: none"> a) There is no gender racial or other forms of discrimination; b) Everyone is treated equally and receive the same amount of pay for the same type of work; c) The workers have their own worker representatives whom they have nominated and elected; d) They are aware of what constitutes sexual harassment and there has been no incidence of sexual harassment. However, female workers within the CU were not aware of the procedure for lodging a complaint on sexual harassment other than to the WEC Chairperson, or if the perpetrator is someone of a higher position than the WEC Chairperson. e) Wages are paid by cheque no later than 7th of the following month, and they cash it at the nearby grocery shops; f) They purchase daily necessities from the nearby grocery stores. Most workers also shop in Muadzam Shah town for their groceries. All estates apart from Mekassar Estate provide free transportation for workers to go to the town. g) Some workers also shop complained of high prices of items sold at the grocery shop, and they chose to shop at the nearest town i.e. Muadzam Shah. h) Some workers at the BLE POM mentioned about the cloudy & earthy smell of water supplied to the linesite. The Manager informed that the Mill is currently doing desilting work but promised to rectify the situation soonest. Further checks confirmed that the water quality has improved. i) Comfortable housing is provided rent free where drinking water and electricity is available. j) They are aware of complaints procedure, company policies of child labour. |

RSPO PUBLIC SUMMARY

| | | | |
|--|--|--|--|
| | | <p>k) The foreign workers at Mekassar Estate complained about the following:</p> <ul style="list-style-type: none"> • abusive treatment by the Assistant Manager (verbal and physical) • they have to walk to the estate main gate to catch the bus into town and walk back from the main gate to their accommodation with their groceries because unlike other estates within Bukit Leelau CU, there was no van provided to the workers. • They did not use the grievance mechanism available as they were not confident that the system could address the issues. <p>This has been raised as a Major Non-Compliance under Indicators 6.5.1 and 6.5.4 below.</p> | |
| 2) Settlers | | Not applicable | |
| 3) Villagers / Local communities (including women representatives, displaced communities) | | Interviewed local communities' representatives from Kg Ipoh, Kg Kundang, Kg Runchang, Kg Bayar, Kg Sawah Batu, Kg Tanjung Kelapa, Kg Gadak and Kg Melogo (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 | | 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. All welcome future transactions / business from Bukit Leelau CU. | |
| 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 Rompin Forestry Department and PERHILITAN Pahang personnel from Kuantan. Officer from Jabatan Tenaga Kerja Rompin was also interviewed regarding Employment contract of workers of contractor Sasaran Perentas at Mekassar Estate. No issue/regulatory non-compliance were raised by the Government Departments on Bukit Leelau CU units. | |
| 8) Independent growers / Smallholders | | Not applicable | |
| 9) Indigenous people <i>* If applicable, refer to AUDITORS' GUIDE IN REPORTING ORANG ASLI MATTERS at the end of the checklist (in Attachment 3 of this report) for more information about the indigenous people in this CU.</i> | | <p>Interview with Tok Batin and representatives of Kg Ipoh, Kg Kundang, Kg Runchang, Kg Bayar, Kg Sawah Batu, Kg Tanjung Kelapa, Kg Gadak and Kg Melogo. They are indigenous people in the CU. So far, no issue has been highlighted. Tok Batin has a good relationship with the estate management and is aware of complaint channel available at CU.</p> <p>Tok Batin/representative of the Orang Asli village</p> | |

RSPO PUBLIC SUMMARY

| | |
|----------------------------------|--|
| | interviewed are as follows: <ul style="list-style-type: none"> • Kg Ipoh – Fauzi a/l Ibrahim • Kg Kundang - Ladik, • Kg Runchang (RPS) – Batin Ibrahim & Hafizan a/l Hamzah, • (Kg Bayar)/Kg Sawah Batu - Mokhtar • Kg Tanjung Kelapa – Asa Ibrahim, • Kg Gadak – Mamak M and • Kg Melogo – Rashid a/l Karim |
| 10) Contractor | Contractors interviewed for each unit in the Bukit Leelau CU and it was evident that the 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. |
| 11) Previous land owner (if any) | No issue with previous landowner, hence, not applicable |
| 12) Others (please specify) | <p>Bukit Leelau POM: Interview with 3 Boilerman and 4 FFB Grader. Site inspection at Production and Non-Production area such as FFB Ramp, Boiler, Steriliser, Workshop, SW Store, Chemical Store, Effluent Pond, etc.</p> <p>Mekassar Estate: Interview with 12 harvesters from Indonesian, Nepalese, Myanmar, Bangladeshi and Indian. Site inspection at 04F and 04H. Then, to Buffer Zone, Workshop, SW Store, Chemical Store and Housing.</p> <p>Merchong Estate: Interview with 5 manurers and 5 new harvesters from Bangladeshi, Indian and Indonesian. Site inspection at 10E, 03D, 08C. Then, to Buffer Zone, Workshop, SW Store, Chemical Store and Housing.</p> |

RSPO PUBLIC SUMMARY

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. Bukit Leelau Oil Mill, Bukit Leelau Estate, Detas Estate, and Mekassar Estate are the subsidiaries of Perusahaan Mekassar (M) Sdn.Bhd. while Merchong Estate is the subsidiary of Syarikat Pukin Ladang Kelapa Sawit Sdn.Bhd. 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 40 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)

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

Table 1: Actual FFB production by the supply base for the last reporting period
(August 2022 to July 2023)

| Estates | FFB Production | |
|---------------------|--------------------|----------------|
| | Tonnes | Percentage (%) |
| Bukit Leelau Estate | 23,977.48 | 18.07 |
| Detas Estate | 44,589.84 | 33.60 |
| Mekassar Estate | 16,024.95 | 12.08 |
| Merchong Estate | 31,638.01 | 23.84 |
| Laukin A Estate | 15,281.99 | 11.52 |
| IOI Sister Estate | | |
| Leepang Estate | 1,178.72 | 0.89 |
| Total | *132,690.99 | 100.00 |

*It has been noted that the CU is experiencing low resources and low FFB collection during this monitoring period. However, in terms of projection, the conditions are expected to be back to normal.

Table 2: Projected FFB production by supply base for the next reporting period
(August 2023 –July 2024)

| CU own estates | FFB Contribution | |
|---------------------|------------------|----------------|
| | Tonnes | Percentage (%) |
| Bukit Leelau Estate | 53,570 | 24.49 |
| Detas Estate | 64,210 | 29.36 |
| Mekassar Estate | 28,670 | 13.11 |
| Merchong Estate | 49,600 | 22.68 |
| Laukin A Estate | 22,660 | 10.36 |
| Total | 218,710 | 100 |

RSPO PUBLIC SUMMARY

**Table 3: Actual FFB received and CPO & PK dispatch by the Mill for the last reporting period
(August 2022 to July 2023)**

| | Total (MT) |
|-------------------------------------|------------|
| FFB Received | 132,690.99 |
| FFB Processed | 132,690.99 |
| CPO Production | 28,699.15 |
| PK Production | 5,273.25 |
| CPO delivered as RSPO certified | 23,753.51 |
| CPO delivered as non-RSPO certified | 0 |
| PK delivered as RSPO certified | 4,965.42 |
| PK delivered as non-RSPO certified | 0 |
| Credit traded under Book & Claim | 0 |

**Table 4: Projected FFB received and CPO & PK dispatch by the Mill of the next reporting period
(August 2023 to July 2024)**

| | Total (MT) |
|----------------|------------|
| FFB Received | 218,710 |
| FFB Processed | 218,710 |
| CPO Production | 52,499 |
| PK Production | 9,287 |

Table 5 Planted and certified area of the CU

| Estate | Planted (ha) | Certified (ha) |
|---------------------|--------------|----------------|
| Bukit Leelau Estate | 1946 | 2096.00 |
| Detas Estate | 2125 | 2300.70 |
| Laukin A Estate | 907 | 1619.90 |
| Mekassar Estate | 1126 | 1209.39 |
| Merchong Estate | 1797 | 1952.50 |
| Total | 7901 | 9178.49 |

RSPO PUBLIC SUMMARY

Table 6 Planting profile for Mekassar Estate

| Year of planting | Planting cycle (1 st , 2 nd , 3 rd , 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 7 Planting profile for Merchong Estate

| Year of planting | Planting cycle (1 st , 2 nd , 3 rd , 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 8 Planting profile for Bukit Leelau Estate

| Year of planting | Planting cycle (1 st , 2 nd , 3 rd , 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 9 Planting profile for Laukin A Estate

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

Table 10 Planting profile for Detas Estate

| Year of planting | Planting cycle (1 st , 2 nd , 3 rd , 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 | 3 rd cycle | Immature | 4 | 0.19 |
| TOTAL | - | - | 2125 | 100 |

RSPO PUBLIC SUMMARY

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 – 07-9497276 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 2023 to 2025 as verified through
Time Bound Plan dated 19/05/2023

- 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?

Sighted approval by RSPO secretariate on date 19/05/2023

- 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 No scheme smallholders at CU

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

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

NA

- 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)

There was complaint received to Bukit Leelau Estate manager, The top management and HR already take an action such as:

- Give counseling for anger management
- Domestic enquiry
- 2 weeks suspension
- Transfer out

During interview with relevant employees such as mandore and workers were confirmed all the issues has been settles and the manager already seek an apologizes to respective mandore and workers.

4.0 DETAILS OF NON-CONFORMITY REPORT

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

| | | |
|---------------------------|---------|---------------------|
| Total no. of minor NCR(s) | List :3 | 3.3.3, 3.5.2, 6.5.4 |
|---------------------------|---------|---------------------|

| | | |
|---------------------------|---------|-------|
| Total no. of major NCR(s) | List :1 | 6.5.1 |
|---------------------------|---------|-------|

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

| | |
|---------------------------|-----------|
| Total no. of minor NCR(s) | List : NA |
|---------------------------|-----------|

| | |
|---------------------------|----------|
| Total no. of major NCR(s) | List :NA |
|---------------------------|----------|

5.0 AUDIT CONCLUSION

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

RSPO PUBLIC SUMMARY

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 90 days of the audit. Recommended for suspension of the certificate.

Note: Major NCRs which are not addressed within a further 90 days shall result in the certificate being withdrawn.

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

Audit Team Leader : ROZAIMEE BIN AB RAHMAN

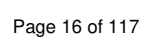


24/11/23

(Name)

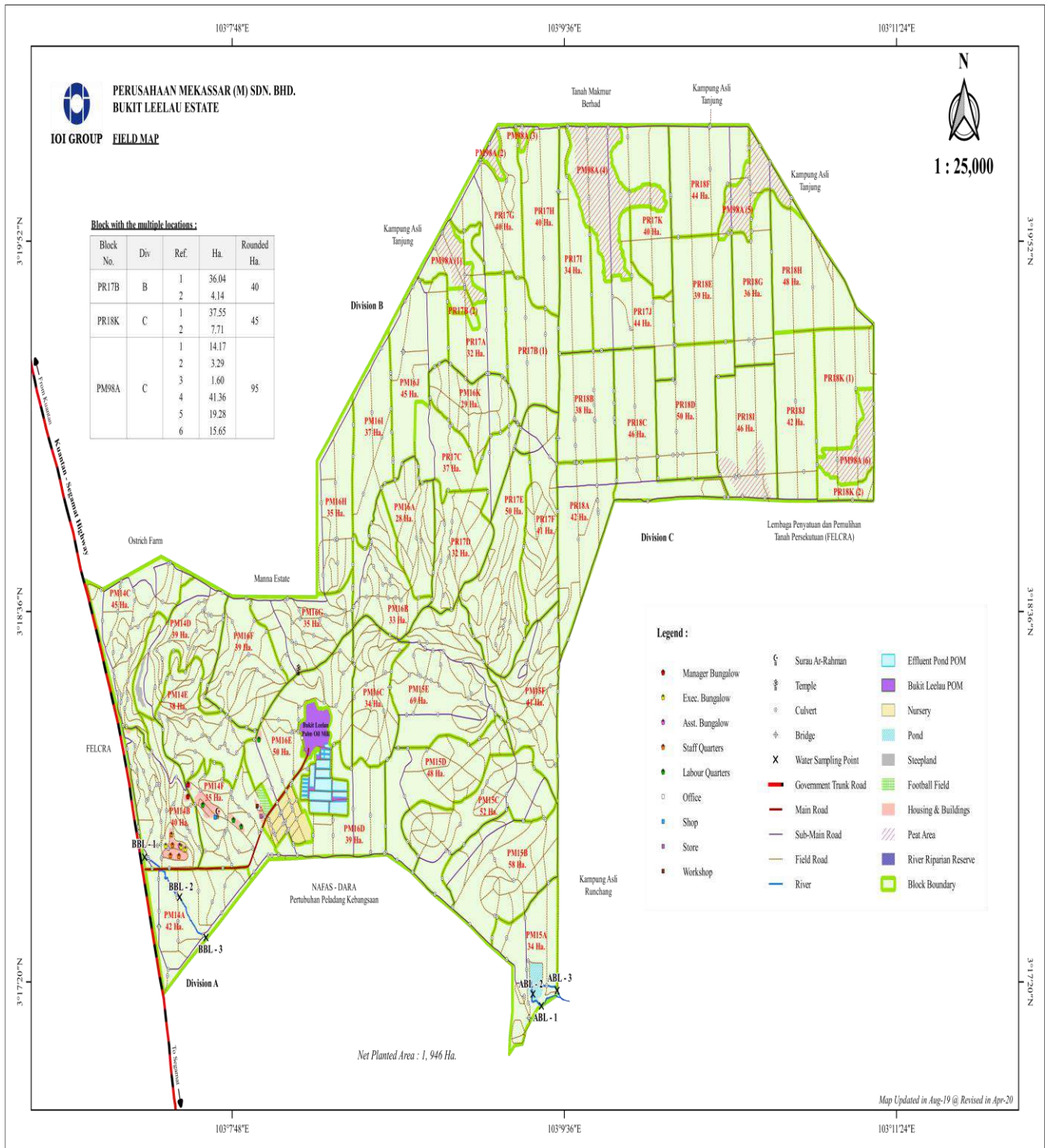
(Signature)

(Date)



RSPO PUBLIC SUMMARY

Maps indicate kampung Orang Asli Runchang and Kg Asli Tanjung



SURVEILLANCE 3 AUDIT PLAN

1. 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.

2. Date of assessment : 21-25/08/2023

3. Site of assessment : **Bukit Leelau CU**

- **Bukit Leelau POM**
- **Bukit Leelau Estate**
- **Merchong Estate**
- **Mekassar Estate**
- **Laukin A Estate**

4. Reference Standard :

- a. MYNI 2019 of RSPO P&C 2018 / MSPO 2530-3&-4/ MSPO SCCS ~~RSPO Independent Smallholder Standard, Nov 2019 / RSPO Management System Requirements and Guidance for Group Certification of FFB Production, March 2018/~~ MSPO 2530-3&-4:2013, MSPO SSCCS
- b. RSPO Certification System Documents
- c. Company's audit criteria including Company's Manual/Procedures

5. Assessment Team

Lead Auditor : Rozaimie Bin Ab Rahman (RAR) – SCCS, metric template, TBP

Auditor :

- Selvasingam T kandiah (STK) – Safety, GAP
- Dzulfiqar Azmi (DA) – Safety Environmental
- Rahayu Zulkifli (RZ)- Social internal
- Ismail Adnan (IA) – Social External, HCV

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

7. Audit Method

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

8. Audit Findings

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

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

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

9. RSPO 2018 Principles and Criteria (P&C) Metrics Template

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

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

- a) Reporting time frames for economic data are:
 - i. Calendar year (January to December): January 2022 to December 2022, and
 - ii. 12 month period counting up to two months before audit month: July 2022 to June 2023
- b) Reporting time frames for demographic data:
 - i. For mill and estate workers: as of 31 December 2022
 - ii. For smallholders and outgrowers: January 2022 to December 2022
- c) Reporting time frame for all other social and environmental data:
 - i. January 2022 to December 2022

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

10. Confidentiality Requirements

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

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

11. Working Language : English and Bahasa Malaysia

12. Reporting

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

13. Facilities Required

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

14. Assessment Programme Details : As below

RSPO PUBLIC SUMMARY

Day one: 20/08/2023 (Monday)

| | Activities / areas to be visited | | | | | Auditee |
|--------|---|--|--|--|--|---------------------------|
| 9.00am | Opening Meeting (Bukit Leelau POM) – Audit team introduction and briefing on assessment objectives, scope, methodology, criteria and programmes by SIRIM QAS Audit Team Leader. | | | | | |
| 8.30am | 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 |
| 9.20am | To assign each audit team members – site and the P&C requirements (Bukit Leelau POM) | | | | | |
| | RAR | DA | STK | RZ | IA | |
| | <ul style="list-style-type: none"> RSPO Metric Template verification GHG verification Time bound plan and uncertified management units <p>Site visit and assessment on Supply Chain Implementation incl. the</p> <ul style="list-style-type: none"> Model used System Requirements for the supply chain Documented procedures Purchasing and goods in Outsourcing activity Sales and goods out Processing Records keeping Registration Training Claims Interview with PIC SCCS, contractors, etc | <ul style="list-style-type: none"> supplier, etc Training and skill development programmes Continuous improvement Evaluate effectiveness of training conducted Mill best practices Environmental practice witness activities at site riparian zone SW management Pollution prevention\Waste management | <ul style="list-style-type: none"> Occupational safety & health practice <p>witness activities at site</p> <ul style="list-style-type: none"> Mill best Practices Interview with workers, safety committee and contractors, | <p>Site visit and assessment on implementation:</p> <ul style="list-style-type: none"> Social aspects - SIA, management plan & implementation, stakeholders. Complaints and grievances on stakeholders Site visit and assessment on implementation: Laws and regulations Social aspects - SIA, management plan & implementation, workers' quarters. Interview with employees, gender committee, worker representative, union representative, etc Linesite inspection Complaints and grievances | <ul style="list-style-type: none"> Inspection of protected sites with HCV attributes Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone implementation, Interview with stakeholders representative, etc Complaints and grievances Interview with local communities, contractors, suppliers. | |

RSPO PUBLIC SUMMARY

| | | |
|---------|--|---------------------------|
| 13.00pm | LUNCH BREAK | All |
| 14.00pm | Continue assessment | Guide(s) for each auditor |
| 17.00pm | Audit team discussion / End of Day 1 audit | All |

Day 2: 21/08/2023 (Tuesday)

| Time | Activities / areas to be visited | | | | | Auditee |
|--------|---|--|---|--|---|---------------------------|
| 8.00am | Overview of current activities at Mekassar Estate | | | | | Respective Scheme Manager |
| 8.30am | To assign each audit team members – site and the P&C requirements | | | | | Guide(s) for each auditor |
| | RAR | DA | IA | RZ | STK | |
| | Site visit and assessment on Supply Chain Implementation incl. <ul style="list-style-type: none"> • RSPO Metric Template verification • GHG verification • Time bound plan and uncertified management units • Occupational safety & health practice | Site visit and assessment on implementation: <ul style="list-style-type: none"> • Environmental practice • witness activities at site • riparian zone • Training and skill development programmes • Continuous improvement • Evaluate effectiveness of training conducted • | <ul style="list-style-type: none"> • Inspection of protected sites with HCV attributes • Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • HCV Assessment management plan & implementation • Environmental practice • witness activities at site • riparian zone • SW management • Pollution prevention • Waste mngt | <ul style="list-style-type: none"> • Site visit and assessment on implementation: • Laws and regulations • Social aspects - SIA, management plan & implementation, workers' quarters. • Interview with employees, gender committee, worker representative, union representative, etc • Linesite inspection • Complaints and grievances • Gender committee | <ul style="list-style-type: none"> • Site visit and assessment on implementation: • Laws and regulations • Occupational safety & health practice • witness activities at site • Estate best Practices • Interview with workers, safety committee and contractors, | |

RSPO PUBLIC SUMMARY

| | | |
|---------|---|---------------------------|
| 13.00pm | LUNCH BREAK | All |
| 14.00pm | To assign each audit team members – site and the P&C requirements | Guide(s) for each auditor |
| 17.00pm | Audit team discussion / End of Day 2 audit | All |

Day 3:22/03/2023 (Wednesday)

| Time | Activities / areas to be visited | | | | | Auditee |
|--------|---|---|---|--|--|---------------------------|
| 8.00am | Overview of current activities at Merchong Estate | | | | | Respective Scheme Manager |
| 8.30am | To assign each audit team members – site and the P&C requirements | | | | | Guide(s) for each auditor |
| | RAR | DA | IA | RZ | STK | |
| | Site visit and assessment on Supply Chain Implementation incl. <ul style="list-style-type: none"> RSPO Metric Template verification GHG verification Time bound plan and uncertified management units Occupational safety & health practice | Site visit and assessment on implementation: <ul style="list-style-type: none"> Environmental practice witness activities at site riparian zone Training and skill development programmes Continuous improvement Evaluate effectiveness of training conducted | <ul style="list-style-type: none"> Inspection of protected sites with HCV attributes Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone HCV Assessment management plan & implementation Environmental practice witness activities at site riparian zone SW management Pollution prevention Waste management | <ul style="list-style-type: none"> Site visit and assessment on implementation: Laws and regulations Social aspects - SIA, management plan & implementation, workers' quarters. Interview with employees, gender committee, worker representative, union representative, etc Linesite inspection Complaints and grievances Gender committee | <ul style="list-style-type: none"> Site visit and assessment on implementation: Laws and regulations Occupational safety & health practice witness activities at site Estate best Practices Interview with workers, safety committee and contractors, | |

RSPO PUBLIC SUMMARY

| | | |
|---------|---|---------------------------|
| 13.00pm | LUNCH BREAK | All |
| 14.00pm | To assign each audit team members – site and the P&C requirements | Guide(s) for each auditor |
| 17.00pm | Audit team discussion / End of Day 3 audit | All |

Day 4:23/08/2022 (Thursday)

| Time | Activities / areas to be visited | | | | | Auditee |
|---------|---|---|--|--|--|---------------------------|
| 8.00am | Overview of current activities at Laukin A Estate | | | | | Respective Scheme Manager |
| 8.30am | To assign each audit team members – site and the P&C requirements | | | | | Guide(s) for each auditor |
| | RAR | DA | IA | RZ | STK | |
| | Site visit and assessment on Supply Chain Implementation incl. <ul style="list-style-type: none"> • RSPO Metric Template verification • GHG verification • Time bound plan and uncertified management units • Occupational safety & health practice | Site visit and assessment on implementation: <ul style="list-style-type: none"> • Environmental practice • witness activities at site • riparian zone • Training and skill development programmes • Continuous improvement • Evaluate effectiveness of training conducted | <ul style="list-style-type: none"> • Inspection of protected sites with HCV attributes • Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • HCV Assessment management plan & implementation • Environmental practice • witness activities at site • riparian zone • SW & Waste management • Pollution prevent | <ul style="list-style-type: none"> • Site visit and assessment on implementation: • Laws and regulations • Social aspects - SIA, management plan & implementation, workers' quarters. • Interview with employees, gender committee, worker representative, union representative, etc • Linesite inspection • Complaints and grievances • Gender committee | <ul style="list-style-type: none"> • Site visit and assessment on implementation: • Laws and regulations • Occupational safety & health practice witness activities at site • Estate best Practices • Interview with workers, safety committee and contractors, | |
| 13.00pm | LUNCH BREAK | | | | | All |

RSPO PUBLIC SUMMARY

| | | |
|---------|---|---------------------------|
| 14.00pm | To assign each audit team members – site and the P&C requirements | Guide(s) for each auditor |
| 17.00pm | Audit team discussion / End of Day 4 audit | All |

Day 5 : 24/08/2023 (Friday)

| Time | Activities / areas to be visited | | | | | Auditee |
|--------|---|---|---|--|--|---------------------------|
| 8.00am | Overview of current activities at Bukit Leelau Estate | | | | | Respective Scheme Manager |
| 8.30am | To assign each audit team members – site and the P&C requirements | | | | | Guide(s) for each auditor |
| | RAR | DA | IA | RZ | STK | |
| | Site visit and assessment on Supply Chain Implementation incl. <ul style="list-style-type: none"> • RSPO Metric Template verification • GHG verification • Time bound plan and uncertified management units • Occupational safety & health practice | Site visit and assessment on implementation: <ul style="list-style-type: none"> • Environmental practice • witness activities at site • riparian zone • Training and skill development programmes • Continuous improvement • Evaluate effectiveness of training conducted | <ul style="list-style-type: none"> • Inspection of protected sites with HCV attributes • Forested area, plantation boundary, adjacent and neighbouring land use, riparian zone • HCV Assessment management plan & implementation • Environmental practice • witness activities at site • riparian zone • SW management • Pollution prevention • Waste management | <ul style="list-style-type: none"> • Site visit and assessment on implementation: • Laws and regulations • Social aspects - SIA, management plan & implementation, workers' quarters. • Interview with employees, gender committee, worker representative, union representative, etc • Linesite inspection • Complaints and grievances • Gender committee | <ul style="list-style-type: none"> • Site visit and assessment on implementation: • Laws and regulations • Occupational safety & health practice witness activities at site • Estate best Practices • Interview with workers, safety committee and contractors, | |

RSPO PUBLIC SUMMARY

| | | |
|----------|---|---|
| 13.00pm | LUNCH BREAK | All |
| 14.00pm | Verification on outstanding issues for CU Auditor to inform auditee on the required document / records Continue Audit Team discussion and preparation of assessment findings. | All Auditors |
| 16.00pm | Discussion and acceptance on assessment findings with Management Representative and visited site Plantation / Scheme Manager | Auditors, Mill and Plantation / Scheme Managers |
| 16.30 pm | Closing meeting at CU / End of audit | All |

RSPO PUBLIC SUMMARY

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 accessed through https://www.ioigroup.com/Content/S/S_Define |
| | 1.1.3 (C) Records of requests for information and responses are maintained. | Yes | The POM and Estates in the Bukit Leelau CU have identified personnel responsible for social issues (including 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. Verified communications sighted in these records were the "Borang Aduan" (in Employee Grievance Book) requesting repairs of the employee's houses. |
| | 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 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. According to the procedure, any communication from the public will be responded within 5 working days. The Procedures are communicated to all levels of employees via common notice boards at the workplaces and workers' housing quarters. |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--|--|---------------|---|
| | 1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives. | Yes | Stakeholder lists for all the units under Bukit Leelau CU were available and verified during the audit and updated. They each comprise relevant government agencies such the Department of Environment, the Labour Office, Forestry Department, Department of Wildlife and National Parks, PERKESO, canteen operators, contractors, suppliers, neighbouring estates, nearby villagers, schools, Department of Orang Asli Development (JAKOA), government district clinic, NGOs, workers representative and gender committee leader. |
| 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 the IOI's 'Code of Business Conduct & Ethics'. 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. The requirement to adhere to this Policy is also present in all contracts entered into with contractors. The agreements for the sampled contractors above for Bukit Leelau CU were verified during the Audit. |
| | 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 the IOI Sustainability Team and Safety and Health Teams had 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 review, 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 assessed continued to use their established Legal Requirement Register. The document last reviewed in Mar 2023 (POM and all Estates by Head office IOI Legal Department. It is periodically reviewed by each Operating Unit with guidance from the Group Sustainability and Safety Department to ensure changes in law are updated, and compliance met and non-compliance are mitigated. 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 on subscribed to Lexis-Nexis Advance Malaysia, news release through printed and online newspaper, law change tracked by book publisher (MDC Book Publications), Federal Government Gazettes, circulars from relevant associations i.e. MPOA, MPOB, MAPA, SOCSO, EPF, DOE, DOSH, etc. |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|---|--|---------------|--|
| | 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 | The Mill and Estates continued to maintain legal/authorised boundaries that were clearly demarcated and visibly maintained. The mill which is situated inside Bukit Leelau Estate land, had its boundary clearly marked with Chain Link fence. All boundaries sighted above were clearly demarcated and visibly maintained. |
| 2.2 All contractors providing operational services and supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements. | 2.2.1 A list of contracted parties is maintained. | Yes | A list of contracted parties was updated and maintained in the list of stakeholders for Bukit Leelau. The list of stakeholders was verified in each operating business visited for Bukit Leelau CU. |
| | 2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available. | Yes | It was evident 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 IOI sister company which is Leepang 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. | NA | The Mill processes only Fresh Fruit Bunches supplied by IOI Plantation Berhad owned estates which are certified to RSPO (Detas, Bukit Leelau, Merchong, Mekassar, Laukin A) |

RSPO PUBLIC SUMMARY

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 mill and all the estates continued to have annual budgets with projections until 2027/2028. There is a 5-year financial plan comprising of both OPEX and CAPEX. The cost of production is reviewed and compared against expenditure each year with projections in place for future years. The 5 years plan is available for the crop processed, produce and cost of production in RM are reviewed during the conduct of audit. All 4 Estates visited also continued to have documented business plans with projections until the financial year 2027/2028. At the estates, the budge 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. The program for the forthcoming six years is as below. Was reviewed during audit. |
| | 3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken. | Yes | Bukit Leelau CU continued to hold management reviews at planned intervals to discuss on issues related to sustainability such as Mill and its supply bases, Estates within the CU meetings and operation meetings (estate manager and estate key personnel) for effective implementation of RSPO. The latest common Management Review Meeting for the Mill and all Estates (Bukit Leelau Grouping) was held July 2023. The Review meeting was held after their respective RSPO/MSPO internal Audits. |
| 3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations. | 3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. | Yes | The action plan for continuous improvement was implemented, based on consideration of the environmental impacts and opportunities of the unit of certification. The plan was defined in the Environmental Impact Assessment Management Action Plans & Continuous Improvement Plan, last reviewed in Aug 2023. |
| | 3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Sec. using the RSPO metrics template. | Yes | Auditor has verified all the data in metric template was accurate as per reported. |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|---|--|---------------|--|
| 3.3 Operating procedures are appropriately documented, consistently implemented and monitored. | 3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place. | Yes | <p>Both mill and estate operations are guided by the Group's Manuals and Standard Operating Procedure. The mill processing guidelines and standards are detailed via Group Standard Operating Procedures (StOP).</p> <p>For Palm Oil Mill of IOI Plantation Services Sdn Bhd which was updated on 01/07/2021. Content therein comprising of 17 Stations. the following process/activities among others;</p> <ol style="list-style-type: none"> 1. FFB Reception 2. Sterilization / threshing / pressing 3. Oil room / kernel extraction 4. Incinerator / CPO CPK dispatch 5. Engine Room 6. Electrical / Workshop 7. Vehicle 8. Boiler Station 9. POME Treatment Plant / Water Treatment Plant 10. Effluent pond management 11. ESP Boiler <p>The Estates in Bukit Leelau CU adopted the following documented manuals and documents as their standard operating procedures:</p> <ol style="list-style-type: none"> 1. Standard Operating Procedures (SOP) 2. Safe Operating Procedure (SaOP) 3. Oil Palm Agricultural Policy (OPAP) 4. IOI Group Policy Documents (8 Policies) & Company Guidelines (16 Numbers) <p>Among the estate operations covered by the procedures were Buffalo harvesting and healthcare, oil palm nursery, land clearing and preparation, planting technique, cover crop, fertilizer application, weeding, pest and disease, harvesting and crop evacuation, road maintenance, workshop, foliar sampling etc. The simplified versions of StOP and SaOP in Bahasa Malaysia were made available in office, muster ground, general store, chemical stores notice & sign boards. Safety procedure sign boards were also noticed placed in various places like in line site and in the field. The management had developed, established and reviewed the SOP for peat soil maintenance.</p> |
| | 3.3.2 A mechanism to check consistent implementation of procedures is in place. | Yes | <p>All Estates in Bukit Leelau CU continued to have a mechanism to check consistent implementation of procedures is in place. The implementation of SOPs is monitored on a daily basis by the field staffs and Assistant Managers with overall overview by the Managers. The monitoring is made via supervision and records maintenance.</p> |
| | 3.3.3 Records of monitoring and any actions taken are maintained and | NO | <p>Relevant records on implementation and monitoring by both the estates and the Mill are being maintained. Some of the records are:</p> |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--|---|---------------|---|
| | available. | | <p>POM</p> <ul style="list-style-type: none"> i. Daily Production Report (sighted month of June & July 2023) providing details as follows; <ul style="list-style-type: none"> • FFB received / processed / balance • FFB certified non-certified quantity • Produce production / despatch / balance • Storage capacity/ status / laboratory results ii. Unscheduled General Manager – Processing min twice monthly <p>Estates Operations</p> <p>The monitoring of the SOP implementation was closely made by all levels of the supervisory personnel with records maintained and checked. Among others, the records maintained are;</p> <ul style="list-style-type: none"> i. Daily production/work records for the core activities at the estates ii. field cost book / chemical consumption record iii. mature/immature field work program – <ul style="list-style-type: none"> 12. fertilizer application, <ul style="list-style-type: none"> - herbicide spraying, - rat baiting, - Harvesting and collection of FFB. <p>All the above records were kept for a minimum period of 12 months. However, the records of monitoring and any actions taken of PPE distribution for head covering was not effectively maintained and implemented. Minor NCR DA 01 2023 was raised.</p> |
| 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>Each operating unit within Bukit Leelau CU has its own SIA. The SIA for 2020-2025 has been prepared by IOI's own Sustainability Team and are reviewed on an annual basis.</p> <p>Evidence was available that each SIA, Management Action Plans and Continuous Improvement Plans have been developed with the participation of affected parties. The evidence of stakeholder participations includes records of stakeholders consulted as well as the meeting minutes. The stakeholders consulted included external and internal stakeholders such as shop owners, canteen operators, guardians of worship places, Women Empowerment Committees, Joint Consultative Committees, as well as written</p> |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--------|--|---------------|---|
| | | | <p>grievances received. Interviews with the affected stakeholders also confirmed that they have been consulted.</p> <p>Among the positive and negative social impacts considered included satisfaction with Merchantrade, effects of delay on renewal of passport and workers permit, prices of items sold at sundry shops/canteens, transportation services provided to their respective blocks, impacts from mechanisation, changes in working hours, as well as food security.</p> <p>Bukit Leelau CU has established its environmental management and monitoring plans under Environmental Impact Assessment Management Action Plans & Continuous Improvement Plan. The Environmental aspect and impact which covers form upstream activities such as FFB reception until downstream processes was sighted during assessment.</p> <p>Identification and evaluation of environmental impact was done for all activities and processes related to the mill operation. Among the most significant environmental receptors are the boiler stack emission, which is associated with air emission, palm oil mill effluent (POME) discharge and land contamination which related to managing the schedule waste and general waste. The environmental impact assessment was 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>So far, no issues related to environmental has been highlighted during internal and external stakeholders' consultation.</p> |
| | 3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. | Yes | <p>Evidence was available that the SIA management and monitoring plans were implemented, reviewed and updated annually with participation of affected stakeholders. The implementation can be verified by looking at the actions taken following impacts raised by the stakeholders. The reviews were conducted annually. The latest review was conducted in Aug 2023.</p> <p>As of the date of the surveillance audit, it was verified that there have been no changes is the Company's stakeholder composition, shareholding, hectarage, replanting activities, that necessitates a fresh SEIA assessment. 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. The CU activities and action plan 2023 on compliance to legal requirements, aspects/impacts, action plans, waste identification & disposal method, control of</p> |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--|--|---------------|---|
| | | | scheduled waste, list of pollutants and monitoring system, improvement plan. Positive and negative impacts are identified. So far, no timetable for changes identified. |
| 3.5 A system for managing human resources is in place. | 3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable. | YES | The procedure for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and explained to them at the beginning of the recruitment. The applicable SOP for foreign workers is the Foreign Workers Recruitment Guideline & Procedure in Malaysia. The company has also come out with repatriation and abscondment procedure. For local workers the procedure applicable is Employment Procedures for Local Workers (Recruitment, Selection and Hiring), retirement and termination. These procedures are available on the main notice boards located at muster ground and office. Evidence was available that the workers understood the Foreign Workers Recruitment Guideline & Procedure when they informed the auditor that their colleague was repatriated for failing his FOMEMA test before the expiry of his contract and had to pay for his own airfare. |
| | 3.5.2 Employment procedures are implemented, and records are maintained. | NO | Reviewed during the surveillance audit were 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. However, it was found during the surveillance audit that the recruitment procedures for employee termination have not been implemented in accordance with IOI Plantation Foreign Workers Recruitment Guideline & Procedures in Malaysia. A Minor Non-Compliance No. RZ 01 of 2023 was raised. |
| 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 and Health Policy has been reviewed in Jan 2023. It is available in Bahasa Malaysia and English language. The policy has been communicated to all employees through briefings and hard copies of policies were seen displayed on the estates notice boards. Based on interviews conducted with mill workers, harvesters, spraying and manuring operator, general workers, 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 has conducted the risk assessment on all its operations 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 are monitored. | Yes | Occupational health and safety (OHS) management plan for Bukit Leelau CU has 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 |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|---|--|---------------|--|
| | | | Committee meetings, etc. Generally, the OSH plans for the year 2022/2023 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, the Safety, Health & Environment Department. have carried out the internal audit on a yearly basis to check the implementation. Other than that, the workplace inspection was done monthly to ensure all H&S plan was done effectively. Reports produced from each visit by the assigned party were reviewed. It was noted that the operation units have taken necessary action to address the comments received. |
| 3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained. | 3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training. | Yes | The estates and mill have local adjustment to tailor with individual needs for training program for year 2023. The documented program has been reviewed during the audit. |
| | 3.7.2 Records of training are maintained, where appropriate, on an individual basis. | Yes | Relevant training records maintained accordingly. |
| | 3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed. | Yes | Training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Sighted latest training conducted in June 2023 – Critical Control Point Training – training conducted internal parties while session for contractors were conducted in Aug 2023. |

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 | Yes | BLPOM obtained 100% certified FFB from its own certified supply base and certified IOI Sister Estates (as listed below). |

RSPO PUBLIC SUMMARY

| Ref. in RSPO SCCS | Indicators | Comply Yes/No | Findings |
|-------------------|--|---------------|-------------------------------|
| | P&C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and source of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, the inly MB Module is applicable. | | |
| 3.8.2 | Mass balance Module A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3 rd party certified supply base. | Yes | NA this Mill IP |
| 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 | Yes | As reported in the body text. |

RSPO PUBLIC SUMMARY

| Ref. in RSPO SCCS | Indicators | Comply Yes/No | Findings |
|-------------------|--|---------------|---|
| | palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report. | | |
| 3.8.4 | The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform). | Yes | Member Name Member Name: Perusahaan Mekassar (M) Sdn Bhd - Bukit Leelau Palm Oil Mill Holding Name: IOI Commodity Trading Sdn Bhd License Information Commodity: Palm Oil RSPO Membership Number: 2-0002-04-000-00 Type of Business: Oil mill Supply Chain Model :Identity Preserved |

RSPO PUBLIC SUMMARY

| 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 req. • demonstrate awareness of the org.'s procedures for the implementation of this standard. | 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> <p>RSPO Supply Chain – Module D – CPO Mills: Identity Preserve (IP)</p> <ol style="list-style-type: none"> 1. Purpose 2. Scope 3. Responsibilities 4. Reception of Raw Material 5. Processing & Storage 6. Dispatch of Mill Produce 7. Records and Retention 8. Training 9. Claims 10. Overproduction 11. Handling Complaints 12. Non-Conformities Product 13. Management review 14. Reference 15. List of Amendment 16. Attachment |

RSPO PUBLIC SUMMARY

| Ref. in RSPO SCCS | Indicators | Comply Yes/No | Findings |
|-------------------|--|---------------|---|
| | <ul style="list-style-type: none"> 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 The site shall have documented procedures for receiving and processing certified and non-certified FFBs. | Yes | <p>Internal audit procedure:</p> <ol style="list-style-type: none"> Purpose Scope Responsibility Procedure details Reference List of amendment 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. The latest training has been carried out in June 2023 for critical control point and in Aug 2023 for External Stakeholder/contractor (transporter) training has been conducted by assistant mill engineer.</p> <p>Under para 3.1 of RSPO Supply Identity Preserve (IP), was noted that Mill Manager has the overall responsibility for and authority over the implementation and compliance of the requirements.</p> <p>Bukit Leelau Certification Units only received certified crops from its own estates and certified sister crops. The procedure has established for receiving and processing only certified FFBs named: RSPO Supply Chain – Module D – CPO Mills: Identity Preserve (IP): 4 - reception of raw material</p> |

RSPO PUBLIC SUMMARY

| 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 NC 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 org. shall be able to maintain the int. audit records and reports. | Yes | <p>Internal audit procedure is available. Audit report has also been established “2023 RSPO Chain 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 in July 2023 lead by appointed internal audit team. 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 and some of issues has been discussed are:</p> <ol style="list-style-type: none"> Welcoming speech by regional manager Updates on RSPO & MSPO standard requirement Discussion on internal & external audit report Performance review & customer feedbacks Status of correction and corrective action Follow up action from previous management review Continuous improvement aspects Complaint and grievances Resources need and training Roundtable assessment of additional issues and discussion on the action plan Other matters |

RSPO PUBLIC SUMMARY

| 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, Laukin A Estate (own estates) and sister Estate Leepang A Estate. The validity of the certificate from 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. Verified through BLPOM weighing system called 'Milcomp' and random sample of weighbridge ticket from the said system. Required information is available.</p> <p>There was no overproduction at Bukit Leelau Certification Unit. Total last year certified volumes and last year actual sold were as reported in the body text.</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"> - 5.2-Handling Complaints - 5.3-Handling Non Conformities <p>Latest training has been carried out in Aug 2023 for External Stakeholder/contractor training has been conducted by assistant mill engineer.</p> |

RSPO PUBLIC SUMMARY

| 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 min. info for RSPO certified products is made available in document form. The info 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 doc):</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 docs were issued; e) RSPO cert. no.; f) A description of the product, incl. the applicable SC modal (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>All the sales and trading were handled by HQ, which has 2 trading companies that handle the sales and purchase of RSPO CSPO & CSPK from IOI mills. There are IOI Commodity Trading Sdn Bhd (ICT), and IOI Global Services Sdn Bhd (IGS).</p> <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> |

RSPO PUBLIC SUMMARY

| 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 ind. 3rd parties, the mill holding the cert. shall ensure that the ind. 3rd party complies with relevant reqs. of this RSPO SC Cert.</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 op. if an audit is deemed necessary.</p> <p>c) The mill has a doc. control system with explicit proc. for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure that the 3rd 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 outsources transportation certified products prior to delivery to the end buyer.</p> <p>Transporter appointed (for CPO only) has signed. It has been specified by the Management of BLPOM, in clause 19-iii) sustainability requirements etc. as per appendix "IOI C" as supplementary to the agreement which stated that the transporter shall comply with 'to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary'</p> <p>For delivery of PK, the lorry is being chartered by buyer.</p> <p>Training has been carried out for transporters in Aug 2023 by Assistant Mill Engineer. 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> |

RSPO PUBLIC SUMMARY

| 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. It was updated in May 2023. |
| 3.8.11 | The mill shall inform its CB in advance prior to conducting 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 as per procedure RSPO Supply Chain- Identity Preserve (IP). |

RSPO PUBLIC SUMMARY

| Ref. in RSPO SCCS | Indicators | Comply Yes/No | Findings |
|-------------------|--|---------------|---|
| | 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 accounting system according to conversion ratios stated by RSPO. c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock). | Yes | Not Applicable since this is IP POM |
| 3.8.13 | Extraction rate The oil extraction rate (OER) and the kernel extraction rate (KER) shall | Yes | 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). 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. |

RSPO PUBLIC SUMMARY

| Ref. in RSPO SCCS | Indicators | Comply Yes/No | Findings |
|-------------------|---|---------------|--|
| | 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. | | |
| 3.8.14 | Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate. | Yes | |
| 3.8.15 | Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation. | Yes | <p>The marketing department is 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 was 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 was issued by the POM.</p> |
| 3.8.16 | Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to | Yes | <p>The registration of transaction is being carried out by Marketing Department subordinate using the :</p> <p>License Information</p> <p>Commodity: Palm Oil</p> <p>RSPO Membership Number: 2-0002-04-000-00</p> <p>Type of Business: Oil mill</p> |

RSPO PUBLIC SUMMARY

| Ref. in RSPO SCCS | Indicators | Comply Yes/No | Findings |
|-------------------|---|---------------|---|
| | <p>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> | | <p>Supply Chain Model: Identity Preserved</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> |

RSPO PUBLIC SUMMARY

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 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 prohibiting retaliation against Human Rights Defenders. It was evident that the Policy was communicated to all levels of workforce during trainings and stakeholders meetings. |
| | 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 instigating violence or using any form of harassment in the units' 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 (Section 7.0)". 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 app where complainants can complain via Google apps. This latest innovation i.e., "IOI MESRA" had been tested and fully implemented. With regards of ensuring anonymity of complainants or whistle-blowers, IOI has its 'Whistle-blowing Policy', which ensures anonymity and protection for whistleblowers, HRDs and complainants' representatives 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. Interviews conducted with workers, local communities and external stakeholders found they are aware and fully understood the established IOI's Grievance and Complaint Mechanism. |
| | 4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed | Yes | Evidence was available that parties to a grievance are kept aware of the progress of their complaints. |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--|---|---------------|--|
| | timeframe and the outcome is available and communicated to relevant stakeholders. | | |
| | 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. The grievance party has the option of access to independent legal and technical advice, to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. |
| 4.3 The unit of certification contributes to local sustainable development as agreed by local communities. | 4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated. | Yes | Bukit Leelau CU's significant contributions to the local development include employment opportunities to the local community. In 2019, Bukit Leelau CU has completed the project in collaboration with Global Environment Centre and government agencies known as the Mini Landscape Plan for Peatlands Adjacent to Bukit Leelau Estate, Pahang where degraded areas were rehabilitated. Ensuing re-wetting of the areas, planting activities of 5 ha each was undertaken equally by IOI Plantation and the local communities who would be able to reap long-term benefits from the rehabilitated peatland. Nevertheless, communication with GEC on the project is still on going. |
| 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. 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. |
| | 4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include: | Yes | |
| | 4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, | Yes | |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--------|--|---------------|---|
| | 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. | | |
| | 4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. | Yes | |
| | 4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. | Yes | |
| | 4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities). | Yes | 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. No FPIC involved. |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--|--|---------------|--|
| | 4.4.5 (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. | Yes | This requirement in this indicator does not apply to Bukit Leelau CU. No FPIC involved. |
| | 4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. | Yes | |
| 4.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions. | 4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. | Yes | 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. Furthermore, there are no new plantings established on local peoples' land, and no FPIC process involved. |
| | 4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. | Yes | |
| | 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 | Yes | |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--------|---|---------------|---|
| | consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new ops. | | |
| | 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 neighbouring estate. Furthermore, there are no new plantings established on local peoples' land, and no FPIC process involved. |
| | 4.5.5 Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. | Yes | |
| | 4.5.6 Evidence is available that the communities gave consent to the initial planning phases of the ops prior to the issuance of a new concession or land title to the operator. | Yes | |
| | 4.5.7 New lands are not acquired for plantations and mills after 15/11/2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. | Yes | There were no new lands acquired for plantation and mills after 15/11/2018. The current operation area including mill and estates as per stated in the land title. |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|---|--|---------------|--|
| 4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with thru a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. | 4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. | Yes | The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the "Grievance Procedure for land owner 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 land owner 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. |
| | 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 | 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 land owner 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 neighbouring estate. The audit team has also interviewed relevant stakeholders such as the Tok Batin and representatives of local communities and from the interviews, it can be concluded that there was no evidence of any land dispute at Bukit Leelau CU. |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|---|--|---------------|---|
| rights, subject to their FPIC and negotiated agreements. | 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 from 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. No new plantings established on local peoples' land, and no FPIC process involved. |
| 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 doc. process of FPIC. | Yes | |
| | 4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. | Yes | |
| | 4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant reqs. | Yes | There was no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations. |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--------|--|---------------|--|
| | 4.8.4 For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighboring communities where applicable). | Yes | There is no evidence that land conflict is not present in the area of the unit of certification. |

Principle 5: Support smallholder inclusion

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

| Clause | Indicators | Comply Yes/No | Findings |
|--|---|---------------|---|
| 5.1 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses. | 5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders. | Yes | 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 | In Bukit Leelau POM Price for FFB adopted the MPOB Pricing. All prices are calculated by the MPOB and the mill takes the price and follows what MPOB guided. No outsider FFB supplies are received from smallholders at IOI Bukit Leelau CU as this mill is an Identity Preserved mill, and therefore this Indicator is not applicable. |
| | 5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented. | Yes | |
| | 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 have been 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 don't have any smallholders sent the FFB to them and they currently do not act as dealer or collection centre, so they did not have any agreement with the smallholders. Hence, the availability of fair, legal and |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|---|--|---------------|--|
| | | | transparent contracts related to smallholders is not applicable. However, it can be confirmed that contracts entered into with contractors are fair, legal and transparent and have an agreed timeframe. The contracts also contain a description of the services provided by the contractor, the amount payable, timeframe for payment, termination clause, rights and obligations of both parties, etc. Interviews with sampled contractors confirmed it. |
| | 5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. | Yes | Based on the following invoices and payment vouchers, evidence was available that agreed payments have been made to contractors in a timely manner with details of the amount paid given. |
| | 5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government). | Yes | Weighing Equipment in IOI Bukit Leelau POM (shared with Bukit Leelau Estate) has been 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 Corporation Berhad (IOIC) is committed to supporting independent small producers. To enhance our efforts, our Commodity Marketing Responsible Sourcing Team has partnered with Malaysian-based social enterprise Wild Asia to find ways to connect, support and give more values to small producers within IOIC's supply base and this statement has been published at website @ https://www.ioigroup.com/sustainability/ioi-wild-asia-partnership-in-supporting-malaysian-smallholders-in-responsible-production . However, the smallholders are willing to go for MSPO only for now. |
| | 5.1.9 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. | Yes | The CU also has developed a Standard Operating Procedure (SOP) on Stakeholder Consultation (Stakeholder Request Procedure', 'Grievances Reporting Flow Chart' and 'Grievance Procedure for Land Owner 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 | 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. |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|------------------------------------|---|---------------|--|
| sustainable palm oil value chains. | 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 | |
| | 5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. | Yes | |
| | 5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme. | Yes | |

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 non-discrimination and equal opportunity policy entitled Equal Opportunity Employment and Freedom of Association Policies is available at Bukit Leelau CU. This Policy is publicly displayed at the main notice boards and at the workers' housing. Among other things, 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 | YES | IOI Group's Sustainable Palm Oil Policy signed by the Group Managing Director and Group Head of Sustainability states that no worker would be charged any recruitment related fee at any stage in the recruitment process. Newly employed migrant workers from |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--|--|---------------|---|
| | been discriminated against including charging of recruitment fees for migrant workers. | | India and Indonesia confirmed that they did not pay any recruitment fee either in their home country or after arrival in Malaysia. Neither were they made to pay anything that the local worker was not required to pay. |
| | 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 | Evidence was available that the recruitment selection, hiring and access to training were based on skills, capabilities and medical fitness. Verified during this surveillance audit that the process of recruitment for local employees starts with each job applicant filling up a job application form attaching copies of NRIC, qualification and previous work experience. The respective Manager would then assess their respective suitability to the job vacancy. Newly recruited workers would also attend 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 | Clause 4.1.2 of IOI's Guidelines on Reproductive Health, the Estate Health Assistants will carry out health screening including urine pregnancy test (UPT) every 3 months for general workers subject to their consent to ensure reproductive health of employees are protected. Members of the WEC and other female workers interviewed during this surveillance audit confirmed their understanding that the health screening and UPT are done for safety and health purposes and would only be carried out with their written consent. As part of the triangulation process, documents containing the female workers' consent and refusal were sighted. At Bukit Leelau POM, seven workers consented and four declined their consent for various personal reasons. |
| | 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 | Each unit within Bukit Leelau CU has its own gender committee known as Women Empowerment Committee (WEC). Members of the WEC were interviewed and WEC meeting minutes were reviewed during this surveillance audit. WEC members understood the roles of the WEC, potential issues of concern that women have such as sexual harassment and harassment at workplace, domestic violence, and reproductive rights. They were aware of the grievance mechanism for addressing issues of concern, and they can also provide feedback to management on any social impacts they may encounter. It was also verified that the description on the website mentioned above is correct and implemented. |
| | 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. This was verified by reviewing sampled payslips and employment contracts of the following workers. It has been confirmed that workers doing the same job receive the same rate of pay. |
| 6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or | 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 BM) and explained to them in language they understand. | YES | Each foreign worker signed an employment contract, and local workers signed a job offer letter. It was verified during the surveillance audit that each contract was prepared in accordance with the language the workers are familiar with. For example, Bengali was used for Bangladeshi workers, Hindi for Indian workers, Nepali for workers from Nepal and Bahasa Indonesia for Indonesian workers. |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|---|--|---------------|---|
| industry minimum standards and are sufficient to provide decent living wages (DLW). | 6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g., regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members. | Yes | <p>Sampled during the audit were employment contracts and monthly payslips as per Indicator 6.2.1 above. The payslips were sampled based on months with the highest, lowest and median crop production in order to get a clear representation of the workers' wages. Employment contracts for all workers clearly detail out payments and conditions of employment, such as daily working hours, contract duration, overtime pay, statutory deductions (EPF, SOCSO, EIS), non-statutory deductions (water and electricity where applicable), annual/medical leave, public holiday, mutual termination, maternity entitlement, etc. The contracts were all found to be valid, duly signed and are still in force. It was verified that the sampled payslips gave accurate information on compensation for work done. This included number of days offered and number of days worked in a month, overtime hours carried out, public holiday pay, maternity leave taken, allowances and incentives the workers were entitled to. None of the check roll workers have any family members assisting them.</p> <p>Therefore, based on detailed review of sampled employment contracts and payslips, Bukit Leelau CU has demonstrated that the payslips give accurate information on compensation for all work done.</p> |
| | 6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements. | YES | <p>Employment contracts and payslips were sampled and reviewed during this surveillance audit at Bukit Leelau CU. The sampled documents are as per Indicator 6.2.1 above. It was clearly detailed out in the sampled employment contracts that regular working hours is 7.5 hours per week with 30-minute rest after 5 hours, or a spread over period of 10 hours with 2.5 hours of rest. Records of statutory deductions for SOCSO, EPF, EIS for local employees were also verified. Non-statutory deductions were for water and electricity which have received written approval from the Labour Office. Written requests by the workers to deduct their salaries for water and electricity (where applicable) were also sighted.</p> <p>Any work on rest day (Sunday) were only carried out after the workers had signed the Rest Day Requisition Form. Evidence was also available that workers were not forced to work on rest day as one harvester had his name cancelled from the form. Those who work on rest day received double the normal rate as evidenced by the sampled payslips reviewed during audit. The sampled payslips also showed that the workers were paid in accordance with the Minimum Wages Order 2022.</p> |
| | 6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. | YES | <p>Workers of Bukit Leelau CU are being provided with adequate housing, sanitation facilities, water and electricity supplies, medical and welfare amenities free of charge. Other amenities available included a surau, futsal court, sundry shop and canteen. Visits to the workers' housing confirmed that workers' houses were generally kept in good and well-maintained condition. This was further confirmed by workers interviewed during the audit. Grasses are kept short, and rubbish disposed of regularly. Perimeter drains were kept in a clean condition that permitted free flow of water.</p> |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--------|--|---------------|---|
| | 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. | | It was evident that the housing inspections were carried out by the Estate Health Assistants on a weekly basis. Each estate clinic was operated by an Estate Health Assistant. And the Visiting Medical Officer visits the clinics every two weeks. |
| | 6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. | YES | Bukit Leelau CU was able to demonstrate that efforts were made to improve workers' access to adequate, sufficient and affordable food. Apart from each operating unit having its own canteen and sundry near the workers' housing, workers were also allocated areas near their houses for vegetable cultivation. To monitor the price of items sold at the sundry shops and canteens, price comparisons were made with other shops/restaurants nearby or those in Muadzam Shah. Transportation costs were also taken into account to determine the price reasonableness. Free van transport was also provided by Merchong, Bukit Leelau, and Laukin A Estates, at least once a month for workers to purchase groceries at Muadzam Shah town. |
| | <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 | YES | <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> |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|---|---|---------------|---|
| | <p>Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment.</p> <ul style="list-style-type: none"> The unit of certification may choose to implement the “living wage” payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation <p>Until such time where the Malaysian version of “decent living wage” has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid.</p> | | |
| | 6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal. | YES | All the estates and mill employ full-time employees. There is no casual, temporary or day labour engagement at all operating units within Bukit Leelau CU. |
| 6.3 The CU 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 recognizing freedom of association is available in the IOI's Equal Opportunity and Freedom of Association Policy. This was explained to all workers during Policy training 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 | Worker representatives were freely elected by workers themselves as evidenced from records of elections. This was further verified by the workers during audit interviews. Every two months, the workers have their own Employee Consultative Committee (ECC) meetings where they would highlight issues that would like to bring to the management. The worker representatives then attend the Joint Consultative Committee (JCC) meetings with management to bring and discuss issues brought up during the ECC meetings. |
| | 6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected | YES | Bukit Leelau CU was able to demonstrate that the workers' representatives were freely elected by their respective countrymen without any interference from the management. These include local and migrant workers. This was confirmed by the workers during this surveillance audit, and the workers' representatives themselves. Each nationality has its |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|---|---|---------------|--|
| | representatives for all workers including migrant and contract workers. | | own worker representative, i.e., Malaysian, Indonesian, Indian, Nepali, Bangladeshi and Myanmar (only at the Mill). There were no contract workers within Bukit Leelau CU. |
| 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 | IOI's Sustainable Palm Oil Policy contains a provision for the protection of children, including the prohibition against child labour. 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 verification procedure. | 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 the age of the workers when they applied for the job. Workers' employment files were sampled and reviewed. Please refer to Indicator 6.2.1 above for the samples taken. |
| | 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 | Records of communications on no child labour were reviewed during the audit. Based on the documents signed, communication about the Policy were communicated to all levels of employees. Interviews 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. | NO | IOI's Sustainable Palm Oil Policy which was signed by the Group Managing Director/Chief Executive Officer and Group Head of Sustainability contains the Policy to prevent sexual and other forms of harassment. Additionally, prevention of sexual harassment also exists in IOI's Policy entitled "Policy on Harassment at Workplace". Despite trainings provided, Mekassar Estate has not been able to demonstrate the implementation of IOI's Sustainable Palm Oil Policy and the Policy on Harassment at Workplace. During the surveillance audit, the auditors received and verified complaints of harassment which involved verbal abuse, threats and intimidation from 33 foreign workers sampled and interviewed at Mekassar Estate. Therefore, a Major Non-Compliance No. RZ 02 of 2023 was raised. |
| | 6.5.2 (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated | YES | Protection of reproductive rights is contained in IOI's Sustainable Palm Oil is being implemented based on interviews held with women employees. The ladies confirmed that they are able to plan their families and are entitled to 98 days paid maternity leave. |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--|--|---------------|--|
| | to all levels of the workforce. | | Women employees who are exposed to chemicals would be re-assigned to another job once she is confirmed pregnant. Sampled during the audit was a lab assistant whose workstation at the lab was immediately transferred to the office once she was confirmed pregnant. Please refer to Indicator 6.1.4 above. This Policy is displayed at all main notice boards, muster ground and workers' housing. |
| | 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 | Assessment on the needs of new mothers were carried out by Bukit Leelau CU. Sampled during the surveillance audit was assessment done at Bukit Leelau POM in June 2023 after the new mother resumed work after her maternity leave. The assessment included post-natal needs, infant medical check-ups, nursing of babies, medical check-up requirements. |
| | 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. | NO | Para 4 of the Grievance Procedure established states that the company commits to safeguarding all stakeholders involved in the grievance process against potential threats, intimidation, violence or reprisals. Trainings on grievance mechanism were given to all levels of workforce. However, it was found during the surveillance audit that Mekassar Estate could not demonstrate that the grievance mechanism contained in the Company's Policy on Harassment at Workplace dated June 2018 has been adequately and effectively communicated to the workers, and the Policy on Harassment at Workplace dated June 2018 has also not been adequately and effectively communicated to all levels of workforce. Therefore, a Minor Non-Compliance No. RZ 03 of 2023 was raised. |
| 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 | During this surveillance audit, Bukit Leelau CU was able to demonstrate that all sampled workers have entered into employment voluntarily. This was verified during audit interviews with the workers themselves. Among the workers interviewed were general workers, harvesters, sprayers, manurers, drivers, and mill workers. Workers also confirmed that there is no debt bondage or withholding of wages. This was further verified by the payslips. |
| | 6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented. | YES | IOI Plantation Foreign Workers Recruitment Guideline and Procedure contains a specific labour policy and/or procedures for migrant workers. This Guidelines and Procedure covers the No payment of recruitment fee, Pre-employment stages, Arrival of workers, Orientation and induction training, Health screening, Passport handling, Provision of basic |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|---|---|---------------|--|
| | | | items, Grievance mechanism, Contract renewal, etc. |
| 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 chairman for OSH Committee. The Manager subsequently assigned duties of OSH coordinator to the Assistants or healthcare assistant for the downline 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 health and safety have been verified to the satisfactory maintained. The OSH Committee has been established together. The OSH committee organization chart for 2023 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 understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed. | Yes | Emergency Response Plan (ERP) was established. Copies of procedures and telephone numbers were sighted on notice boards and muster grounds. Accident and emergency procedures were available and updated at all estates and POM has been samples. During the site visit, it was sighted Emergency Response Plan was available at Boiler Station, Chemical Store, Workshop and Lubricant Store. During interviews with workers, it was noted that all workers understand ERP. The POM has their own first aid and is trained by competency consultants and the certificate is still valid and available. 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 boxes is regularly checked and refilled, when necessary, by HA. ERP training for fire drill such as explosion, firefighting was trained by BOMBA in July-Aug 2023. 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. Accident statistics were being maintained in a satisfactory manner and periodically reviewed. Accident/injury records were recorded using Lost Time Accident Frequently Rate (AFR) by monthly basis. A quarterly review of accident cases had been carried out during the quarterly OSH committee meeting. |
| | 6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are | Yes | 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. |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--------|--|---------------|--|
| | available, so that workers can change out of PPE, wash and put on their personal clothing. | | 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". |
| | 6.7.4 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law. | Yes | Medical care and accident insurance is provided to all employees, both Local and Foreign workers under Employees' Social Security Act 1969 (Act 4). |
| | 6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics. | Yes | Occupational injuries are recorded using Lost Time Accident (LTA) metrics. Sighted the Bukit Leelau CU has maintained and updated the LTA Summary on a monthly basis and submitted it to Safety, Health & Environment Department. JKPP 8 was submitted in Jan 2023 accordingly. |

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 | <p>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>, wild boar & Weeds.</p> <p>The Plan covered the following:</p> <ul style="list-style-type: none"> • Identification of Pests • Impacts of Pests • Action Plans & Monitoring • Documents to be reviewed • Management Review, Comments & Time Bound • Person in Charge & Timebound Plan. <p>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>Antigonon 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.</p> |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--|--|---------------|---|
| | | | Though all estates 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 a campaign basis – 2 campaigns per year. Baiting stopped when bait acceptance dropped 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 that 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 Group Standard Operating Procedure (StOPs) for Estate Operations, Section 6 of Oil Palm Agricultural Policy (OPAP) manual, the latest established document was Doc: Justification of Chemicals Commonly Used in IOI Plantations in the SOP on Sustainability Document, and 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 ingredients applied per ha and number of applications) are provided. | Yes | <p>The estates continued to maintain records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha. The Estates also maintained Ai per ton of FFB and CPO. Pesticides usages was as follows:</p> <ul style="list-style-type: none"> a) Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available and verified. b) All pesticides used were those officially registered under the Pesticide Act 1974. The CU had used only class III & class IV pesticides. c) No illegal agrochemicals (stated by local and international laws) in particular paraquat were used in their estates. <p>For monitoring usage of chemicals, the estates maintained yearly records.</p> |
| | 7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in | 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>Antigonon leptopus</i> and <i>Turnera subulata</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</i> |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--------|--|---------------|---|
| | accordance with IPM plans. | | <i>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 an economic program and control of other leaves using pesticides only when pest outbreak was above thresh-hold 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 evidence of prophylactic use of pesticides except in the Oil Palm Nursery, immature and young oil palm fields. In the immature and young oil palm fields prophylactic spraying using diluted cypermethrin are still practices for the Pest and Diseases management such as control of Rhinoceros Beetle justified in Oil Palm Agriculture Policy (OPAP) and SOP for Estate Operations. In the Oil Palm Nursery prophylactic spraying of insecticides and fungicides are carried out as justified in Oil Palm Agriculture Policy (OPAP) and SOP for Estate Operations. All 4 Estates visited only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations 2000. |
| | 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 4 Estates visited 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 since Dec 2011. All pesticides used were class III & class IV and some class II. |
| | 7.2.5a Judgment of the threat and verify why this is a major threat. | Yes | As mentioned above in 7.2.5. of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and no paraquat had been used. Hence, the following indicators did not apply to all 4 visited Estates. |
| | 7.2.5b Why there is no other alternative which can be used. | | |
| | 7.2.5c Which process was applied to verify why there is no other less hazardous alternative. | | |
| | 7.2.5d What is the process to limit the negative impacts of the application. | | |
| | 7.2.5e Estimation of the timescale of the application and | | |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--------|--|---------------|--|
| | steps taken to limit 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. 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. |
| | 7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices. | Yes | Pesticides selected for use were those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with OSH USECHH Regulations (2000). At all visited mill and estates the storage of pesticides was in accordance with recognized best practices. They were stored in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders and Pesticides Act 1974 (Act 149) and Regulations. All information regarding the chemicals affixed as product label and the accompanying Safety Data Sheet (see OHS CLASS 2013 Regulations) with details of its usage, hazards, trade and generic names were found available in Bahasa Malaysia language understood by workers or explained carefully to them by a plantation management official at operating unit level. A proper premixing area with eye wash facilities and bathing area is available near to the chemical stores. The wastewater from the washing of empty chemical containers and PPE, and chemical mixing was pumped to a storage tank for reuse in chemical mixing. This is to avoid any contamination of chemicals in 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. At all estates visited, their chemical stores were inspected, and it was noted that they all comply with the relevant act as well as best practice. |
| | 7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes. | Yes | Empty pesticides containers were triple rinsed, holes punched and stored separately in the SW store. The containers were then disposed through DOE approved contractor "Kualiti Alam Sdn Bhd". |
| | 7.2.9 (C) Aerial spraying of | Yes | Aerial spraying of pesticides is not a practice on all 4 visited Estates There was no evidence to show that such a method being used in the 4 Estates. This was also supported through interviews with executives, |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--|--|---------------|---|
| | 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. | | field staffs and workers. No such activities were witnessed during the site/field visit. |
| | 7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. | Yes | Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. All workers were certified fit to handle chemicals. |
| | 7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative eq. work. | Yes | All Estates continued to comply with the Safe Operating Procedure, "Prosedur Kerja Selamat Penggunaan Bahan Kimia" in the Occupational Safety and Health Management System, IOI Corporation Berhad (Plantations) mentions under Item 2 of Semasa Melakukan Kerja Semburan Bahan Kimia ' Adalah dilarang mengambil kerja kanak-kanak bawah 18 tahun dan Wanita yang mengandung atau menyusu untuk menyembur bahan kimia. Thus, no work with pesticides was given to pregnant or breast-feeding women. |
| 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 and disposal plan to avoid or reduce pollution had been documented. Procedures and guideline were used to guide the waste disposal activities and to reduce pollution during routine operation. On the monitoring of water and effluent discharge, monthly and quarterly report for final discharge were submitted to DOE timely, as required by the written approval. Effluent quality monitoring was also done on a monthly basis, with samples taken at final discharge point and sent for analysis. Results of laboratory showed that the discharges were within permissible limits. |
| | 7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. | Yes | Standard Operating Procedure Scheduled Waste Disposal of empty pesticide containers was carried out as per established procedures. Triple rinsing procedures were continually implemented for empty pesticide containers. The rinsed containers were then pierced and stored prior disposal. Records on usage and disposal were well recorded and documented. Scheduled waste had been disposed of through a licensed contractor approved by DOE i.e., Kualiti Alam Sdn. Bhd. |
| | 7.3.3 The unit of certification does not use open fire for waste disposal. | Yes | During site visit at Bukit Leelau CU, there was no evidence of open fire has been used for waste disposal. All domestic wastes (household and food waste only) at Bukit Leelau CU have been disposed via approved Waste Contractor. |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--|---|---------------|--|
| 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 | <p>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) in a few indexes:</p> <ul style="list-style-type: none"> i) Index No: 3.5 - Leguminous Cover Plant Manuring ii) Index No: 4.1 to 4.8. – Manuring <p>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. Fertiliser application, which was of paramount importance for maintenance of soil fertility, was carried out based on the recommendation made by the Agronomist of IOI Research Centre. The main fertiliser recommends for 2023 were NK Mixture AS, NK Mixture AC, MOP, Kieserite, GML, Rock Phosphate and Borate.</p> |
| | 7.4.2 Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health. | Yes | <p>Periodic tissue/leaf and soil sampling were carried out in Bukit Leelau CU in 2022. Periodic tissue/leaf was 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 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 were used as the basis for the fertilizers recommendation to maintain and improve soil fertility for 2023.</p> <p>The latest tissue/leaf and soil sampling were carried in June 2023 on Bukit Leelau Estate. The results would be used for formulating the fertilizer recommendation for 2024. 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.</p> |
| | 7.4.3 A nutrient recycling strategy is in place, which incl. the recycling of EFB, POME, palm residues and optimal use of inorganic fertilisers. | Yes | <p>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.</p> |
| | 7.4.4 Records of fertiliser inputs are maintained. | Yes | <p>Bukit Leelau CU continued to monitor their fertilizer inputs as recommended by their Agronomist of IOI Research Centre who visited the estates during the annual tissue/leaf sampling. Fertilizer 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. Records of programs and applications of fertilizers were made available to auditors.</p> |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|---|---------------|---|----------------|----------------------------|--------------|--------------|---------------|---------------|----------------------------|-------|--------|--------|--------|--------|----------------|----------------|----------------------------|-------|-------------|------------|--------|------------|----------|-------------|---------|---------|--------------|----------|---------|----------|--------|----------|-------|--------------|---------|---------|--------|-------------|---------|--------|---------|--------|--|---------|-------|-------|--|---------|-------|---------|--|-------|-------|------|--|--|--|--------|--|--|--|-------|--|--|--|---------|--|--|--|------|--|--|--|-------|--|--|--|-------|--|--|--|--|--|---|-----|---|--|-----|--|--|--|-----|--|
| 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 | Based on the soil's maps, there were no fragile/marginal soils in all estates visited. The soil maps came with description of the soil's characteristics such as texture, depth, drainage, parent material and key aspect for management. The soil series were classified as follows: | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | <table><tr><th>Merchong</th><th>Mekassar</th><th>Laukin A</th><th>Bukit Leelau</th></tr><tr><td>Batang Merbau</td><td>Batang Merbau</td><td>Bungor- Bungor (Lateritic)</td><td>Banar</td></tr><tr><td>Bungor</td><td>Bungor</td><td>Bungor</td><td>Bungor</td></tr><tr><td>Cherang Hangus</td><td>Cherang Hangus</td><td>Durian -Durian (Lateritic)</td><td>Erong</td></tr><tr><td>Gong Chenak</td><td>Gajah Mati</td><td>Durian</td><td>Gajah Mati</td></tr><tr><td>Jelutong</td><td>Gong Chenak</td><td>Harimau</td><td>Harimau</td></tr><tr><td>Organic Clay</td><td>Jelutong</td><td>Malacca</td><td>Jelutong</td></tr><tr><td>Rengam</td><td>Munchong</td><td>Pohoi</td><td>Kampong Pusu</td></tr><tr><td>Serdang</td><td>Pelepah</td><td>Rengam</td><td>Kuala Brang</td></tr><tr><td>Tai Tak</td><td>Rengam</td><td>Serdang</td><td>Leelau</td></tr><tr><td></td><td>Serdang</td><td>Tawar</td><td>Lunas</td></tr><tr><td></td><td>Tai Tak</td><td>Tebok</td><td>Malacca</td></tr><tr><td></td><td>Terap</td><td>Terap</td><td>Nami</td></tr><tr><td></td><td></td><td></td><td>Nangka</td></tr><tr><td></td><td></td><td></td><td>Rasau</td></tr><tr><td></td><td></td><td></td><td>Serdang</td></tr><tr><td></td><td></td><td></td><td>Tavy</td></tr><tr><td></td><td></td><td></td><td>Tawar</td></tr><tr><td></td><td></td><td></td><td>Tebok</td></tr><tr><td></td><td></td><td></td><td></td></tr><tr><td rowspan="2"></td><td>7.5.2 No replanting on steep slopes (above 25 degress) 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.</td><td>Yes</td><td>Bukit Leelau CU had a management strategy for planting on slopes and to minimize 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 estates visited. Slope maps provided showed that there was only very small percentage of area greater than 25° in all estate visited.</td></tr><tr><td>7.5.3 There is no new planting of oil palm on steep terrain.</td><td>Yes</td><td>There is no replanting on steep terrains on all 4 Estates visited.</td></tr><tr><td>7.6 Soil surveys and topographic information are used for site</td><td>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</td><td>Yes</td><td>Soil and Slope 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.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</td></tr></table> | Merchong | Mekassar | Laukin A | Bukit Leelau | Batang Merbau | Batang Merbau | Bungor- Bungor (Lateritic) | Banar | Bungor | Bungor | Bungor | Bungor | Cherang Hangus | Cherang Hangus | Durian -Durian (Lateritic) | Erong | Gong Chenak | Gajah Mati | Durian | Gajah Mati | Jelutong | Gong Chenak | Harimau | Harimau | Organic Clay | Jelutong | Malacca | Jelutong | Rengam | Munchong | Pohoi | Kampong Pusu | Serdang | Pelepah | Rengam | Kuala Brang | Tai Tak | Rengam | Serdang | Leelau | | Serdang | Tawar | Lunas | | Tai Tak | Tebok | Malacca | | Terap | Terap | Nami | | | | Nangka | | | | Rasau | | | | Serdang | | | | Tavy | | | | Tawar | | | | Tebok | | | | | | 7.5.2 No replanting on steep slopes (above 25 degress) 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 minimize 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 estates visited. Slope maps provided showed that there was only very small percentage of area greater than 25° in all estate visited. | 7.5.3 There is no new planting of oil palm on steep terrain. | Yes | There is no replanting on steep terrains on all 4 Estates visited. | 7.6 Soil surveys and topographic information are used for site | 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 | Yes | Soil and Slope 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.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 |
| | | | Merchong | Mekassar | Laukin A | Bukit Leelau | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | Batang Merbau | Batang Merbau | Bungor- Bungor (Lateritic) | Banar | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | Bungor | Bungor | Bungor | Bungor | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | Cherang Hangus | Cherang Hangus | Durian -Durian (Lateritic) | Erong | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | Gong Chenak | Gajah Mati | Durian | Gajah Mati | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | Jelutong | Gong Chenak | Harimau | Harimau | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | Organic Clay | Jelutong | Malacca | Jelutong | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | Rengam | Munchong | Pohoi | Kampong Pusu | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | Serdang | Pelepah | Rengam | Kuala Brang | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | Tai Tak | Rengam | Serdang | Leelau | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | Serdang | Tawar | Lunas | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | Tai Tak | Tebok | Malacca | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | Terap | Terap | Nami | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | Nangka | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | Rasau | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | Serdang | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | Tavy | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | Tawar | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | Tebok | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | 7.5.2 No replanting on steep slopes (above 25 degress) 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 minimize 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 estates visited. Slope maps provided showed that there was only very small percentage of area greater than 25° in all estate visited. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | 7.5.3 There is no new planting of oil palm on steep terrain. | Yes | There is no replanting on steep terrains on all 4 Estates visited. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7.6 Soil surveys and topographic information are used for site | 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 | Yes | Soil and Slope 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.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 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|---|---|---------------|--|
| planning in the establishment of new plantings, and the results are incorporated into plans and operations. | terrain, are taken into account in plans and operations. | | suitability. The soil maps were provided and reviewed by the auditors it was observed that no fragile or marginal soils were found in all 4 visited Estates. |
| | 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, 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 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. |
| 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 15/11/2018 in existing and new dev. areas. | Yes | 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, only Bukit Leelau Estate having peat area planting 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. | Yes | Areas of peat within Bukit Leelau CU were appropriately inventoried, documented and reported to RSPO Secretariat. Evidence was sighted that an updated Report along with maps, etc. was sent to RSPO Secretariat on 19/10/2021 for Bukit Leelau Estate @ 98.63 ha. |
| | 7.7.3 (C) Subsidence of peat is monitored, documented and minimised. | Yes | Bukit Leelau Estate continued to manage peat areas with proper facilities and equipment such as water weirs, water table, piezometer and subsidence pole. All of these facilities are regularly monitored and reported on monthly basis. |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--------|--|---------------|---|
| | 7.7.4 (C) A documented water and ground cover management programme is in place. | Yes | The Bukit Leelau Estate used water level gauge/ruler in drains to monitor ground water levels. Records relating to water management were collected weekly. Based on Peat Land Monitoring Form it was verified that the record of water table monitoring report was available. Through the field observation sighted that water weirs in peat areas are equipped with water gate facilities to ensure that the need of pumping of water is available into the canal. |
| | 7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition. | Yes | Records showed that a Pilot Trial on "Drainability Assessment of Existing Oil Palm Planting in Block PS7 of 10 ha of Bukit Leelau Estate" which has been conducted in Sept 2019 and revised and updated in Oct 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 Oct 2021. The memorandum recommended to continue recording of water level reading and to maintain a water level of 40cm from the peat surface and not to completely drain out all the water. At the time of visit it was observed that water levels in the fields were well maintained. |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--|---|---------------|---|
| | 7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance. | Yes | Bukit Leelau Estate continued to manage the peat area, Block PS7 (10Ha), as per "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019). The area was managed 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 a weekly and monthly basis. The monitoring reports are in place and have been verified by auditor. |
| | 7.7.7 (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance. | Yes | Bukit Leelau CU owned the land as it was leased and bought from the previous land owner which is Pahang State government and KBDYMM Sultan Pahang since 1976 - 2001. In addition, 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. |
| 7.8 Practices maintain the quality and availability of surface and groundwater. | 7.8.1 A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following: | Yes | The Sustainability Department has established a water management plan and reviewed it on an annual basis. The latest review was conducted in Aug 2023. The objectives of the plan were to conserve and to maintain the availability of surface and ground water through pollution prevention. It outlined the method to conserve and minimise pollution of water through implementation of various methods such as best practice of raw water & effluent treatment, maintaining riparian zone, management of land irrigation, maintaining soft vegetation in the field, regular education to employees on conserving water and water pollution preventions. The operating units visited provide the workers with adequate clean water through treated water at the water treatment plant. Drinking water analysis was conducted twice per year. Based on site visit and interview, it was verified that workers have access to clean water and management provide clean water without any charge. |
| | 7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. | Yes | Based on stakeholder consultation with local communities and field visit, there was evidence that the CU does not restrict access to clean water or contribute to pollution of water used by communities. The continued availability of water sources and to avoid negative impacts on other users in the catchment has been carried out water sampling analysis. |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings | | | | | | |
|--|---|---------------|---|-------------|-----------------------------|-----|-------|----|-------|
| | 7.8.1b Workers have adequate access to clean water. | Yes | As verified at Bukit Leelau CU facilities for workers and through interview with workers, all workers have obtained adequate access to treated clean water. Laukin A Estate only get water supply from government @ PAIP. Other estates get water supply from their water catchment @ water treatment plant. To ensure supply of clean drinking water to workers treated water sampling was carried out on a 3 monthly basis. Drinking water quality has been monitored by External Laboratory. Based on the result, water quality monitoring is generally within MOH and SPAN standard at all monitoring points. | | | | | | |
| | 7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017). | Yes | During site inspection at buffer zones area at all estates, sighted the water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017). | | | | | | |
| | 7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. | Yes | An Effluent Treatment Plant (ETP) is available at Bukit Leelau POM to treat the POME. Effluent treatment process flow sighted in the Lay Out Effluent Pond. Stated in the process flow is the maximum mill capacity per hour is 45mt ffb/hr. According to DOE's license, the disposal method of the final discharge is through watercourse via Sg. Temiang. The ETP was regularly maintained by desludging of the ponds to ensure its efficiency. Final discharge samples were taken monthly and sent to an accredited laboratory for analysis. Among the parameters required by the DOE to be monitored are bio-oxygen demand (BOD), suspended solid (SS), oil and grease (O&G), ammoniacal nitrogen (AN) total nitrogen (TN), pH and temperature. The results of analysis were submitted to the DOE on a quarterly basis. All parameters were within the regulatory limit such as BOD discharged to watercourse was not more than 100 mg/l. | | | | | | |
| | 7.8.4 Mill water use per tonne of FFB is monitored and recorded. | Yes | Processed water is obtained from water catchments near the mill. The water usage per tonne of fresh fruit bunches (FFB) continued to be monitored on a monthly basis. | | | | | | |
| 7.9 Efficiency of fossil fuel use and the use of RE is optimised. | 7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented. | Yes | The plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented. Record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Monitoring of diesel fuel consumption was done by all the visited operating units. The data was then used for GHG calculating by using the RSPO GHG Calculator. | | | | | | |
| 7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, | 7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported. | Yes | <div>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:</div> <table><tr><th>Description</th><th>tCO₂e/tProduct</th></tr><tr><td>CPO</td><td>11.69</td></tr><tr><td>PK</td><td>11.69</td></tr></table> | Description | tCO ₂ e/tProduct | CPO | 11.69 | PK | 11.69 |
| Description | tCO ₂ e/tProduct | | | | | | | | |
| CPO | 11.69 | | | | | | | | |
| PK | 11.69 | | | | | | | | |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings | | | | | |
|--|------------|---------------|--|-------|-----------|------------|-----------|--|
| implemented and monitored and new developments are designed to minimise GHG emissions. | | | Land Use | | Ha | | | |
| | | | OP Planted on mineral soil | | 9631.37 | | | |
| | | | OP Planted on Peat | | 98.63 | | | |
| | | | Conservation (forested) | | 4.36 | | | |
| | | | Conservation (non-forested) | | 29.92 | | | |
| | | | Milling extraction rate: | | | | | |
| | | | OER | | 22.10 | | | |
| | | | KER | | 4.12 | | | |
| | | | Mill Emission | | | | | |
| | | | Own Crop | | | | | |
| | | | Emission source | | tCO2e | tCO2e/tFFB | | |
| | | | POME | | 429650.96 | 2.92 | | |
| | | | Fuel consumption | | 1333.12 | 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 | | 430984.08 | 2.93 | | |
| | | | Plantation / field emission | | | | | |
| | | | Own Crop | | | | | |
| | | | Emission sources | | tCO2e | tCO2e/ha | tCO2e/FFB | |
| | | | Land Conversion | | 77304.45 | 9.78 | 0.53 | |
| | | | *CO2 Emissions from Fertiliser | | 5836.10 | 0.74 | 0.04 | |
| | | | **N2O Emissions from peat | | 733.59 | 0.09 | 0.01 | |
| Fuel Consumption | | 2606.38 | 0.33 | 0.02 | | | | |
| Peat Oxidation | | 5350.66 | 0.68 | 0.04 | | | | |
| Sinks | | | | | | | | |
| Crop Sequestration | | -72390.71 | -9.16 | -0.50 | | | | |
| Conservation Sequestration | | -39.58 | -0.01 | -0.00 | | | | |
| Total | | 20378.60 | 2.58 | 0.14 | | | | |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|---|--|---------------|---|
| | 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 polluting activities were assessed through the aspect and impact method and were documented. The activities are inclusive of green gas emissions, chemicals, fertilizer, scheduled waste, solid waste and household waste. Data relating to such activities were collected, analysed and presented during the environmental meetings held by the mill. Some of the Greenhouse Gas emissions are through Land Conversation, Crop Sequestration, Fertiliser, N ₂ O from fertiliser, Fuel Consumption, Peat Oxidation. Plans to reduce or minimise them are in place. |
| 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) practised zero burning as guided by the Zero Burning Policy document signed by the Plantation Director on May 2018. Item 5 of the procedure spelt that zero burning technique shall be observed with the exception of provision alighted by the authority. |
| | 7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management. | Yes | IOI Corporation Berhad have established an IOI Group Fire Management Guidelines that addresses the Post Fire Analysis Programmes, Fire Prevention and Monitoring and Fire Emergency Response. The Guidelines were available at all estates for verification. Emergency Response Team are made available at each Operating Unit and have trained for fire prevention and control measures with their estate. Fire Drill and Fire Fighting Trainings were conducted at the respective estates to all workers. Verified the training records for all estates available. |
| | 7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures. | Yes | During the external stakeholder meeting that was carried out at each Operating Centre (Estate & Mill), all stakeholders including neighbors were briefed on fire prevention and control measures. Besides that, all operating centers have also been prepared Emergency Response Plan (Fire in Field/ Peat Areas in Own or Neighbouring Estate). |
| 7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation | 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 | 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. |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|--|---|--------------|-----------|-------|------|--|-------|-----|--|--------------|--|---------------------|-------|------|------|------|------|-------|------|-----------|------|--------------|-------|------|------|------|------|---------------|-------|------|---|------|------|-----------------|-------|------|------|------|------|-----------------|-------|------|------|------|------|-------|------|---|------|-------|--|-------|--|------|-------|
| Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced. | forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document. | | <p>There is HCV Assessment for each estate in BUKIT Leelau CU conducted by internal Assessor team. The HCV Assessment Report was initially prepared in September 2014 and reviewed last in Aug 2023. The result From Past Hectarage Assessment of HCV / Conservation area using GIS adjustment and mapping resulted in the details of HCV and Conservation areas at Bukit Leelau CU at the time of Audit as follows:</p> <table><tr><th rowspan="2">Estate</th><th colspan="4">2023 Data</th><th rowspan="2">Total</th></tr><tr><th colspan="2">HCV</th><th colspan="2">Conservation</th></tr><tr><td rowspan="2">Bukit Leelau Estate</td><td>River</td><td>0.34</td><td>Pond</td><td>2.76</td><td rowspan="2">5.72</td></tr><tr><td>Steep</td><td>1.16</td><td>R.Reserve</td><td>1.46</td></tr><tr><td>Detas Estate</td><td>River</td><td>8.42</td><td>Pond</td><td>0.36</td><td>8.78</td></tr><tr><td>Laukin Estate</td><td>River</td><td>2.17</td><td>-</td><td>0.00</td><td>2.17</td></tr><tr><td>Mekassar Estate</td><td>River</td><td>1.02</td><td>Pond</td><td>0.05</td><td>1.07</td></tr><tr><td rowspan="2">Merchong Estate</td><td>River</td><td>3.14</td><td>Pond</td><td>1.14</td><td rowspan="2">7.48</td></tr><tr><td>Steep</td><td>3.20</td><td>-</td><td>0.00</td></tr><tr><td>TOTAL</td><td></td><td>19.45</td><td></td><td>5.77</td><td>25.22</td></tr></table> | Estate | 2023 Data | | | | Total | HCV | | Conservation | | Bukit Leelau Estate | River | 0.34 | Pond | 2.76 | 5.72 | Steep | 1.16 | R.Reserve | 1.46 | Detas Estate | River | 8.42 | Pond | 0.36 | 8.78 | Laukin Estate | River | 2.17 | - | 0.00 | 2.17 | Mekassar Estate | River | 1.02 | Pond | 0.05 | 1.07 | Merchong Estate | River | 3.14 | Pond | 1.14 | 7.48 | Steep | 3.20 | - | 0.00 | TOTAL | | 19.45 | | 5.77 | 25.22 |
| | Estate | 2023 Data | | | | Total | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | HCV | | Conservation | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Bukit Leelau Estate | River | | 0.34 | Pond | 2.76 | 5.72 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Steep | | 1.16 | R.Reserve | 1.46 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Detas Estate | River | 8.42 | Pond | 0.36 | 8.78 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Laukin Estate | River | 2.17 | - | 0.00 | 2.17 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mekassar Estate | River | 1.02 | Pond | 0.05 | 1.07 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Merchong Estate | River | 3.14 | Pond | 1.14 | 7.48 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Steep | 3.20 | - | 0.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| TOTAL | | 19.45 | | 5.77 | 25.22 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows: | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid. | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations. | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7.12.4 (C) Where HCVs, HCS forests after 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 | Yes | <p>Every estate in the CU had established an action plan for HCV area titled 'HCV Management Action Plans and Continuous Improvement Programme. Among the programme are listed as below:</p> <ol style="list-style-type: none">Erected and maintain signage of 'no hunting' and 'no fishing' at the forest boundary and buffer zone areaAvoid Chemical usage near the Forest reserve Boundary, Buffer ZoneHCV monitoring for illegal activities by Auxillary Police (AP)HCV and Wildlife RTE training (ERT and Buffer)Training/reminder local stakeholderMaintenance worshipping area by regular weed slashingMonitor illegal entering worshipping area and buffer zone area | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--------|--|---------------|---|
| | 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). | | 8. Erected and maintain signage of 'no hunting' and 'no fishing' at the Sungai Pahang boundary and buffer zone area |
| | 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 identified in the 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 | Yes | Awareness training pertaining HCV and ERT were provided to staff and workers. Among other, the training contains information about legal and disciplinary actions if found guilty of wildlife and HCV offenses. All the visited estates had I conducted training programme on HCV and ERT annually. |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--|---|---------------|--|
| | the company is found to capture, harm, collect, trade, possess or kill these species. | | |
| | 7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. | Yes | There were no reported RTE present in the supply bases in Bukit Leelau CU. However, the supply bases continued to implement HCV and Conservation Area action plans such as to conserve the identified HCV and Conservation areas, boundary monitoring, and riparian buffer zone awareness and monitoring 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: | <i>To include details on Orang Asli</i> 1. To report the name of their kampung and placement (penempatan). No. of the residents of Orang Asli. 2. Where they are located (radius within 5km from the CU). Check the estate map and estate boundary on neighboring Orang Asli villages. 3. Verify the stakeholders list on neighboring Orang Asli community with the CU. 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, | Yes | <u>Kg Tanjung Kelapa (60 households)</u> <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 18/7/2023. Sighted SIA Management Action Plan for Bukit Leelau 2023 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. |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--------|--|---------------|---|
| | <p><i>what the issues and recommended mitigation action.</i></p> <p><i>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.</i></p> <p><i>6. Evidence of FPIC had been implemented by the CU and consent given by the Orang Asli communities.</i></p> <p><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?</i></p> <p><i>8. Consult DFO of Forestry Department and PERHILITAN for any issues related to the Orang Asli.</i></p> <p><i>9. Provide the specific names of Orang Asli representatives sampled during every audit.</i></p> | | <ul style="list-style-type: none"> 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. 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 Asa Ibrahim <p><u>Kg Ipoh (communities migrated from Kg Runchang (10 families))</u></p> <ul style="list-style-type: none"> Located more than 10 km from the Bukit Leelau Estate boundary These villagers originally from Kg Runchang Village is 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 NGO Stakeholder's consultation with Orang Asli communities has been comprehensively and participatorily conducted on 12/4/2023. Sighted SIA Management Action Plan for Bukit Leelau Estate 2023 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 Ipoh was noted. There is no FPIC issue found for Bukit Leelau CU from Kg Ipoh The CSR to Kg Ipoh 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. |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--------|------------|---------------|---|
| | | | <ul style="list-style-type: none"> • There is no issue related to Perhilitan and Forestry Department with Orang Asli at Kg Ipoh • 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 Ipoh interviewed was Fauzi a/l Ibrahim <p><u>Kg Kundang (10 households)</u></p> <ul style="list-style-type: none"> • Located about 5 km from the boundary of Mekassar Estate • Originally from Kg Sawah Batu • Village not provided with electricity and treated water by the Government but by NGO • 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 21/7/2023. Sighted SIA Management Action Plan for 2023 for Mekassar 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 Kundang included donation and employment opportunity. • 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 Mr Ladik <p><u>Kg Bayar (migrated from Kg Sawah Batu (about 5 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 |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--------|------------|---------------|---|
| | | | <ul style="list-style-type: none"> • 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 NGOs • Stakeholder's consultation with Orang Asli communities has been comprehensively and participatorily conducted on 21/7/2023. Sighted SIA Management Action Plan for Merchong Estate 2023 contain 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 Bayar was noted. • There is no FPIC issue found Bukit Leelau CU from Kg Bayar • The CSR to Kg Bayar 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 Bayar • 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 Bayar interviewed was Mr Mokhtar <p><u>RPS 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 21/7/2023. Sighted SIA Management Action Plan for Bukit Leelau Estate 2023 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 |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--------|------------|---------------|---|
| | | | <p>community, maintenance and monitoring of grievance were included in the Plan. However, no social issue affecting RPS Runchang was noted.</p> <ul style="list-style-type: none"> • There is no FPIC issue found for Bukit Leelau CU from RPS Runchang • The CSR to RPS Runchang included donation and employment for villagers. Access to the RPS 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 RPS 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 RPS Runchang interviewed was Hapizan a/l Hamzah (JKKK Kg Ros Ruchang and Batin Ibrahim) <p>Hg Gadak (less than 10 families)</p> <ul style="list-style-type: none"> • Located about 5 km from the boundary of Laukin A Estate • Village 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 25/9/2023. Sighted SIA Management Action Plan for 2023 Laukin A 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 and secondary education are in Bandar Muadzam • There is no FPIC issue found for Bukit Leelau CU from Kg Gadak • The CSR to Kg Gadak 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 |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--------|--|---------------|---|
| | | | <p>treatment.</p> <ul style="list-style-type: none"> There is no issue related to Perhilitan and Forestry Department with Orang Asli at Kg Gadak Grave sites were located outside of Bukit Leelau CU area Representative of Kg Gadak interviewed was Mr Mamak M <p><u>Kg Melogo (less than 20 families)</u></p> <ul style="list-style-type: none"> Located about 5 km from the boundary of Bukit Leelau Estate Village 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 21/7/2023. Sighted SIA Management Action Plan for 2023 Bukit Leelau 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 Melogo was noted. The CU had provided employment to Orang Asli villagers either direct or indirectly through plantation contractors. Children basic and secondary education are in Bandar Muadzam There is no FPIC issue found for Bukit Leelau CU from Kg Melogo The CSR to Kg Melogo 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 Melogo Grave sites were located outside of Bukit Leelau CU area Representative of Kg Melogo interviewed was Mr Rashid a/l Karim |
| | <p><u>Common social issues on Orang Asli</u></p> <p>1.Accessibility for Orang Asli from their village to the estate and/or roaming area.</p> <p>2.Protection of cemetery of Orang Asli which located within the estate.</p> <p>3.Opportunity for employment – male & female.</p> <p>4.Do they understand the</p> | Yes | <p>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 Tanjung Kelapa, Kg Ipoh, RPS Runchang, Kg Kundang, Kg Bayar, Kg Ipoh, Kg Gadak and Kg Melogo 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.</p> |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--------|---|---------------|---|
| | <p>employment procedures and agreement?</p> <p>5.Are their employment contract complying with the RSPO P&C MYNI 2019?</p> <p>6.Did they receive appropriate trainings & briefings and other necessities (PPE) to work as other local/foreign workers?</p> <p>7.Replanting activity that may affected the Orang Asli community.</p> <p>8.Accessibility for clean water from nearby river or water scarcity.</p> <p>9.Hunting of wild boar/monkey/fish/birds within estate area or at the estate boundary.</p> <p>10.Education for the Orang Asli children.</p> | | <p>2 Cemetery for Kg Tanjung Kelapa, Kg Ipoh, RPS Runchang, Kg Kundang, Kg Bayar, Kg Gadak and Kg Melogo are sited outside the Bukit Leelau CU plantations.</p> <p>3 Appointed Harvesting contractors by Bukit Leelau CU in turn provided indirect employment for the Orang Asli from the seven(7) 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 Bukit Leelau CU units for example).</p> <p>4 Interviewed Orang Asli workers understood the employment procedures and agreement.</p> <p>5 Reviewed employment contract complied with the RSPO P&C MYNI 2019</p> <p>6 Orang Asli employees of the contractors received appropriate trainings & briefings and other necessities (PPE) to work as other local/foreign workers.</p> <p>7 No replanting currently at Bukit Leelau CU Plantations.</p> <p>8 Only three Orang Asli villages interviewed (RPS Runchang, , Kg Gadak and Kg Melogo) have access to clean water. Kg Bayar, Kg Tanjung Kelapa, Kg Ipoh and Kg Kundang still relied on river and rainwater although water treatment system was facilitated by an NGO.</p> <p>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.</p> <p>10 Primary education for children of the Orang Asli villages is at the SK Sawah Batu, SK Kota Perdana while their secondary education are in Bandar Muadzam.</p> |
| | <p><u>What CU needs to do to address the issues</u></p> <p>1.FPIC with the affected Orang Asli communities on the estate operation.</p> <p>2.Annual external stakeholder consultation with Orang Asli representative.</p> <p>3.Stakeholder consultation with the community had been conducted during initial SIA assessment.</p> <p>4.Review social action plan with participatory of affected Orang Asli.</p> <p>5.Brief and circulate grievances/ disputes mechanism/procedure.</p> | Yes | <p>1 No FPIC issues with the Orang Asli communities at Bukit Leelau CU. This is confirmed by the representatives of Kg Tanjung Kelapa, Kg Ipoh, RPS Runchang, Kg Kundang, Kg Bayar, Kg Gadak and Kg Melogo interviewed during the audit.</p> <p>2 Stakeholder's consultation with Orang Asli communities has been comprehensively and participatorily conducted on 21/7/2023 and 25/9/2023 Sighted SIA Management Action Plan for 2023 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.</p> <p>3 A stakeholder consultation with Orang Asli community was initially done during initial SIA assessment.</p> <p>4 The updated Social Action Plan (2023) for all Estates had included participatory feedback from the</p> |

RSPO PUBLIC SUMMARY

| Clause | Indicators | Comply Yes/No | Findings |
|--------|--|---------------|---|
| | 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. | | Orang Asli communities (refer to Orang Asli village requests and resolution during Stakeholder's meeting). The Orang Asli communities had been given briefing on grievance/dispute mechanism through stakeholders' consultation meeting on 21/7/2023 and 25/9/2023. They were also briefed during external stakeholders meeting at (Bukit Leelau POM and Bukit Leelau estate – 18/7/2023) and (Mekassar Estate and Merchong Estate – 17/7/2023) and Laukin A Estate – 17/8/2023 5 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. 6 No Orang Asli villages sacred place and cemeteries are located within Bukit Leelau CU Plantations 7 Bukit Leelau CU had continued to provide CSR to Orang Asli communities as evidenced by donations, bridge construction and road repairs/Maintenance etc |

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

| Clause | Indicators | | Comply Yes/No | Findings | | | |
|--|------------|--|---------------|--|----------------------------------|------------|--|
| 5.5.2 Time-bound plan A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills. | (a) | As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat. | Yes | IOI Corporation Berhad is in progress to certify 5 PMU's from 2021 to 2025 as verified through Time Bound Plan (TBP) as 19/05/2023 (revision approved by Head Certification of RSPO) as follows: | | | |
| | | | | No | Plantation Management Unit (PMU) | TBP (Year) | Status |
| | | | | 1 | PT Sukses Karya Sawit, Indonesia | 2023 | RSPO Complaints Panel (CP) 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 |

RSPO PUBLIC SUMMARY

| | | | | | | | |
|--|--|--|--|---|------------------------------------|------|---|
| | | | | | | | <p>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; (a) RSPO Ketapang Complaint for PT BSS, PT SKS & PT BNS (b) RSPO Case Tracker – PT BSS, PT SKS & PT. BNS Status of Complaints</p> |
| | | | | 2 | PT Berkat Nabati Sawit, Indonesia | 2023 | RSPO Complaints Panel (CP) officially closed the complaint case on 12 October 2018. |
| | | | | 3 | PT Bumi Sawit Sejahtera, Indonesia | 2023 | IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its |

RSPO PUBLIC SUMMARY

| | | | | | | | |
|--|--|--|--|--|--|--|---|
| | | | | | | | <p>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; (a) RSPO Ketapang Complaint for PT BSS, PT SKS & PT BNS</p> |
|--|--|--|--|--|--|--|---|

RSPO PUBLIC SUMMARY

| | | | |
|---|--------------------|------|--|
| | | | (b) RSPO Case Tracker – PT BSS, PT SKS & PT. BNS Status of Complaints |
| 4 | PT KPAM, Indonesia | 2023 | NPP and HCSA was approved in April 2018. Currently under development. |
| 5 | IOI-Pelita Sarawak | 2025 | Resolution process (under RSPO CP) Subject to the time required for land survey endorsement and land excised activities |

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 19 May 2023.

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.

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.

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 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.

In its opening remarks, IOI Pelita reconfirmed its offer to excise the unplanted land of approximately 4,000-5,000 ha, which the Sarawak

RSPO PUBLIC SUMMARY

| | | | | |
|--|-----|--|-----|---|
| | | | | <p>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; (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> <p>Internal audit for Sejab Estate has been completed in November 2020.</p> |
| | (b) | Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness; | Yes | 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. |
| | (c) | Any revision to the time-bound plan or to the circumstances of the | Yes | There was revision of Time Bound Plan (TBP) sighted communication (email) with IOI and RSPO as at 19/04/2023 (date revision approved by |

RSPO PUBLIC SUMMARY

| | | | | |
|---|-----|--|-----|--|
| | | 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); | | Head Certification of RSPO). |
| | (d) | Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised. | Yes | The details of the Time Bound Plan are 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; | Yes | <p>Based on the internal audit report for 8 uncertified unit of IOI Group dated 16-19/07/2019 and latest on 20-24/06/2023 (Indonesia), 19-21/02/2019 and latest on 13-15/06/2023 (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.</p> <p>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. For current status all the RACP has been approved by RSPO.</p> <p>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.</p> |

RSPO PUBLIC SUMMARY

| | | | | |
|--|-----|---|-----|---|
| | | | | <p>Governmental 'Hak Guna Usaha' (HGU) application in progress.</p> <p>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> <p>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>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 https://www.ioigroup.com/Content/S/pdf/Closure%20of%20Ketapang%20Case.pdf</p> |
| | (b) | Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8; | Yes | <p>Malaysia</p> <p>On 18 January 2019, IOI retained the services of the Community's Information and Communication Centre (CICOM), a local NGO, to conduct Community Capacity Building program, which is the main component of Stage I of the Resolution Plan.</p> <p>In mid-March 2019, IOI and CICOM launched the Community Capacity Building program, the purpose of which was to do the following:</p> <ul style="list-style-type: none"> • Double check whether the communities have good understanding of a) RSPO Principles & Criteria on conflict resolution, b) Free, Prior and Informed Consent process, and c) Resolution Plan itself; • Provide affected communities with any needed advice and technical expertise; • Gather community grievances, on the basis of which the Community Participatory Mapping would be designed. <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> |

RSPO PUBLIC SUMMARY

| | | | | |
|--|--|--|--|---|
| | | | | <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 https://www.ioigroup.com/Content/S/S_Progress (c) RSPO Case Tracker – IOI Pelita Status of Complaints https://askrspo.force.com/Complaint/s/case/50090000028ErzqAAC/detail <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. Target to completed and certified as per endorsed by RSPO on year 2025.</p> <p>IOI Pelita complaints resolved and details is available at : https://www.ioigroup.com/Content/S/S_IOIPelita</p> <p>Indonesia</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 https://www.ioigroup.com/Content/S/pdf/Closure%20of%20Ketapang%20Case.pdf (b) RSPO Case Tracker – PT BSS, PT SKS & PT. BNS Status of Complaints https://askrspo.force.com/Complaint/s/case/50090000028Erz8AAC/detail <p>Issuance of HGU has been completed as of October 2022.</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</p> |
|--|--|--|--|---|

RSPO PUBLIC SUMMARY

| | | | | |
|--|--|--|--|---|
| | | | | <p>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>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> <p>The RSPO P&C audit has been conducted on 28th November 2022 until 3rd December 2022. RSPO certificate for PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS) and PT Bumi Sawit Sejahtera (PT BSS) has been issued on 16th July 2023.</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: https://rspo.org/public-consultation/ioi-group-pt-kalimantan-prima-agro-mandiri/</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: http://highcarbonstock.org/registered-hcs-assessments/</p> |
|--|--|--|--|---|

RSPO PUBLIC SUMMARY

| | | | | |
|--|-----|--|-----|---|
| | (c) | Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2; | Yes | Based on internal audit report for uncertified units of IOI Group dated 16-19 July 2019 and latest on 20-24/06/2023 (Indonesia), 19 -21 February 2019 and latest on 13-15/06/2023 (Sarawak), there was no issue on labour disputes for all uncertified units. |
| | (d) | Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1; | Yes | Based on internal audit report for uncertified units of IOI Group dated 16-19 July 2019 and latest on 20-24/06/2023 (Indonesia), 19 -21 February 2019 and latest on 13-15/06/2023 (Sarawak), there was no issue on legal non-compliance for all uncertified units. |
| | (e) | The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 5.5.3 (a) – (d) above by the audit team based on self-declarations only by the company, | Yes | <p>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> <p>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.</p> <p>b) Evidence of audit attendance list, audit checklist & report were made available to auditor as 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 16-19 July 2019 and latest on 20-24/06/2023 (Indonesia), 19 -21 February 2019 and latest on 13-15/06/2023 (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 19/05/2023 (approved by RSPO).</p> |
| | | with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach: | | |
| | | <ul style="list-style-type: none"> A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement; | Yes | |
| | | <ul style="list-style-type: none"> Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team. | Yes | |
| | | <ul style="list-style-type: none"> Desktop study e.g. web check on relevant complaints | Yes | |

RSPO PUBLIC SUMMARY

| | | | |
|--|-----|--|---|
| | | | |
| | | <ul style="list-style-type: none"> If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements. | Yes |
| | (f) | For requirements 5.5.3 (a)-(d) above, the classification of critical and non-critical is as stated in the RSPO P&C. If a non-compliance against a critical indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless it is actively addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be available. | |
| | (g) | Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these Certification Systems. | Yes |
| | | | <p>Bukit Leelau CU owned the land as it was leased and bought from the previous land owner which is Pahang State government and KBDYMM Sultan Pahang since 1976 - 2001. Based on the interviews held with local communities from Kg Tanjung Kelapa – Mr Asa ibrahim, Kg Tanjung Ipoh – Fauzi A/L Ibrahim and Kg RPS Runchang -JKK Mr Hafizan A/L Hamzah, Kg Tanjung Kelapa- Mr Asar Ibrahim (located at Bukit Leelau Estate & POM), Kg Kundang -Tok Batin Ladek (Mekassar Estate) and Kampung Bayar (sawah batu) – Tok Batin Mokhtar (Merchong Estate), KG Gadak -JKK Mr Mamak N (Laukin Estate) 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>As of this audit, Bukit Leelau CU is still on track and follows the requirement of uncertified requirement units, Further information can be obtained from IOI ACOP. The details of the Time Bound Plan are 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> |

RSPO PUBLIC SUMMARY

| | | | | |
|--|--|--------------------------|-----|---|
| <p>5.6.6</p> <p>The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p> <p>The CB shall have a mechanism in place to identify the interested parties and ensure a represented samples size of the interested parties are consulted in each audit.</p> <p>The CB shall keep track which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle.</p> | | No additional indicators | Yes | <p>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, 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> |
|--|--|--------------------------|-----|---|

RSPO PUBLIC SUMMARY

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 |
|-------------------------|---------------------------|---|---|---|
| 3.3.3 DA 01 2023 | Minor | <p>Finding: The records of monitoring and any actions taken of PPE distribution for head covering was not effectively maintained and implemented.</p> <p>Objective evidence: Based on an interview with 5 sampled manuring workers at Merchong Estate Block 10E, all of them were using baseball caps. Based on PPE distribution of head covering, last issued for Worker 1 on 12/04/2022, 07/06/2022, 08/08/2022, Worker 2 on 01/09/2022, Worker 3 on 18/08/2023, Worker 4 on 01/08/2023. There is no evidence of head cover for Worker 5. Moreover, there is no evidence of head cover available in stock at the PPE Storage.</p> | <p>Root cause:</p> <ol style="list-style-type: none"> Failed to follow up the purchased PPE stock levels with supplier because the storekeeper is still new and no training yet. The supervisor failed to update the PPE issuance form because not aware of the PPE issuance form despite the storekeeper have recorded the issued PPEs to the workers in different records. Though caps were issued to all manuring workers, the workers were allowed to use their own caps as long as the caps were able to cover their heads appropriately. <p>Corrective Action: The "<i>Prosedur Pemberian & Penggunaan PPE</i>" has been revised to ensure:</p> <ol style="list-style-type: none"> OC to ensure PPE stock is always available and orders are made with ample lead time Management to ensure the appropriate PPE is issued by using the 'Senarai Semak alat pelindung diri dan penaburan baja' before work is commenced. <p>Training using the above revised SOP was carried out to Merchong Estate</p> | <p>The root cause is accepted, and the corrective action plan is addressing the root cause. The effectiveness of implementation will be verified during the next audit.</p> <p>Status: Open</p> |

RSPO PUBLIC SUMMARY

| | | | | |
|---------------------|-------|---|--|--|
| | | | <p>management, supervisors and storekeeper.</p> <p><u>Please see the attachment</u> Appendix 3.3.3 (1) – Revised “<i>Prosedur Pemberian & Penggunaan PPE</i>”</p> <p>Appendix 3.3.3 (2) – Training record revised SOP</p> | |
| 3.5.2 RZ 01 2023 | Minor | <p>Finding: Recruitment procedures for employee termination has not been implementation in accordance with IOI Plantation Foreign Workers Recruitment Guideline & Procedures in Malaysia.</p> <p>Objective evidence: A Nepali worker (Tamang Amrit) had signed an employment contract dated 27/09/2022. Clause 12c) of the contract states that if the worker failed FOMEMA medical examination and declared unfit for work before the expiry of his contract period, the employee shall bear the transportation costs to his home country from Malaysia. On 09/06/2023, Tamang Amrit was found unfit following a FOMEMA medical check-up, and the Company was advised to arrange for repatriation. Via letter dated 10 June 2023, Tamang's employment contract was officially terminated, and he flew back to his home country on 16 August 2023. As confirmed by management, the cost of repatriation was paid by the worker.</p> <p>However, clause 8.1 of IOI Plantation Foreign Workers Recruitment Guideline & Procedures in Malaysia states that the cost of repatriation shall be borne by the company if a foreign worker who has yet to complete his contract period is found to be medically unfit and the doctor's medical report recommends repatriation.</p> <p>When the worker paid for his own airfare back to his home country, the Company therefore was not able to demonstrate that it has implemented the employment procedures on</p> | <p>Root cause: There is a specific term in the workers contract agreement which specify that the workers will bear the cost for repatriation is they failed Fomema before they complete the contract period of 2 to 3 years. This contract has been signed by the workers thus signifying that they agree with the term.</p> <p>However, in reference to the clause 8.1. of IOI Plantation Foreign Workers Recruitment Guideline & Procedures in Malaysia, it is acknowledged that the current statement in the guideline is quite general and does not providing sufficient details to reflects the actual ground implementation. It is therefore having the needs to revise/update the guideline to address the gaps.</p> <p>Corrective Action: The IOI Plantation Foreign Workers Recruitment Guideline & Procedures in Malaysia will be revised according to the current practice and align with all related guideline documents, including the HR SOP and workers employment contract. A revised guidelines will be distributed to all operating centers in the region to be displayed at the notice board. Briefing of</p> | <p>Root cause and the corrective action plan accepted; the effectiveness of implementation will be verified during the next audit.</p> <p>Status: Open</p> |

RSPO PUBLIC SUMMARY

| | | | | |
|-----------------------------|--------------|--|--|--|
| | | <p>payment of repatriation costs contained in IOI Plantation Foreign Workers Recruitment Guideline & Procedures in Malaysia.</p> | <p>the revised guideline is also required as to implement the new guideline.</p> <p>Please see the attachment: Appendix 3.5.2 (1) – The revised of foreign workers recruitment Guidelines and procedures Appendix 3.5.2 (2) – Email distributes to all O. Cs Appendix 3.5.2 (3) – Records of training on revised Foreign Workers Recruitment Guideline & Procedures in Malaysia</p> | |
| <p>6.5.1 RZ 02 2023</p> | <p>Major</p> | <p>Finding: Mekassar Estate has not been able to demonstrate the implementation of IOI's Sustainable Palm Oil Policy (revised in October 2020) on prevention of harassment and Policy on Harassment at Workplace dated June 2018.</p> <p>Objective evidence: Complaints of harassment and intimidation which involved claims of verbal abuse, threats and intimidation were received from 33 foreign workers sampled and interviewed at Mekassar Estate.</p> | <p>Root cause: The main root cause is that the workers have not been using any of the grievance channels to report on the issue, due to the ineffectiveness of training and briefing session.</p> <p>The higher management were only becoming aware of the issue when it was highlighted by the auditors from the interview session during the audit.</p> <p>Although various verification effort has been conducted over the years from both internal and external parties (such as independent survey by Bureau Veritas, KPMG, &Wider, including IOI internal departments Sustainability & HR), there were no feedback received that were able to indicate the issue is happening in the estate.</p> <p>Due to the fact that the management have not been getting any report of complaint and/or grievance on the matter, the management has not been aware on the issue, thus unable to take the necessary steps to investigate and take action</p> | <p>The root cause is plausible, and the CU shall further increase the effort in encouraging and building up the workers' confidence in using their communication channel. In terms of addressing the issue,</p> <p>Sighted the counseling and training which has been conducted to the Assistant Manager dated 11/10/2023, together with the pictorial image of the event where the assistant apologized to respective workers.</p> <p>Sustainability department had also conducted an engagement with the workers on 14/09/2023. The objective of the assessment was as below:</p> <ul style="list-style-type: none"> • To verify all workers satisfied with the apology session by the Assistant Manager. • To ensure all employees are aware on how to lodge a complaint using the IOI Mesra application. • To update the workers with |

RSPO PUBLIC SUMMARY

| | | | | |
|--|--|--|--|--|
| | | | <p>towards the complainee if or when he is found guilty.</p> <p>Corrective Action: The complainee (Assistant Manager) has made a public apology session with the workers for the misbehavior which has transpired, and he asks for forgiveness especially for the workers who he has offended. The complainee also promise to carry out his job in a more professionally in the future,</p> <p>This has been verified by the Sustainability Department who conducted weekly visits for the whole month after the NC was raised. The team has interviewed and explained to workers regarding the investigation process. Based on the feedback received, all the workers have accepted apologies from the Assistant Manager and management team. They also agreed that after the public apology session, the assistant manager has changed for the better and there were no more harsh/vulgar words used towards them.</p> <p>On 04/09/2023, the HR Department has also carried out their survey and providing detailed training to the workers of Mekassar Estate who had been identified having significant lack of awareness on the availability of the company internal grievance mechanism, such as IOI Mesra App, hotline, etc. It is notable a number of reports have been received subsequent to the HR training, indicating the effectiveness of the training.</p> <p>HR team had carried out investigation visit</p> | <p>regards to the investigation process on the complaint raised by the workers during external RSPO & MSPO audits in Mekassar Estate.</p> <p>At the same time, a HR engagement team has also completed a survey on 04/09/2023 involving 87 workers at Mekassar Estate to further explain the measures that they had in grievance mechanism and complaint procedure:</p> <ul style="list-style-type: none"> • Display of step-by-step procedure on how to use the IOI Mesra Application • Conducted training for IOI Mesra apss, grievance / complaint procedure, and guidance for handling harassment at workplace on the same date. <p>Further to the above, SIRIM QAS team has conducted an onsite verification on 16-17/11/2023 to check the actual status on the ground at the CU i.e., Mekassar & Detas Estate were visited. It has been confirmed that the Assistant Manager and staffs at Mekassar Estate and Detas Estate were briefed on the grievance /complaint procedure titled 'Harassment Reporting Procedure', and 'Guidelines for Handling Harassment at Workplace (Oct 2020)' together with Appendix 1:Harassment Reporting Procedure, and Appendix</p> |
|--|--|--|--|--|

RSPO PUBLIC SUMMARY

| | | | | |
|--|--|--|--|--|
| | | | <p>on 12/09/2023 the matters to further clarify the complaints. Subsequent to the visit, a full private & confidential report has been prepared. On the issue of harassment, threat and intimidation, the investigation team found there are merits of the complaints, and the report has been sent to the senior and top management on the decision for disciplinary action. After careful consideration from the management, it was decided that the service of the Assistant Manager shall be discontinued with his resignation. This stern decision is made on the ground of company non-compromised and strict policy on the matter. It is unfortunate this has happened despite the fact that all management team has been fully made aware of company policies on the matter and the repercussion of such misconduct (through various training and briefing session).</p> <p>To ensure the briefing on grievance mechanism procedure to be given to workers at least twice a month so as to ensure the workers are being reminded on the use of procedure, particularly on IOI Mesra App.</p> <p>To display the step-by-step procedure on how to use the IOI Mesra App at all strategic locations in the estate.</p> <p>Sustainability Department to conduct training on Company policy including IOI's Sustainable Palm Oil Policy on prevention of harassment and Policy on Harassment at Workplace for all Operating Centers management.</p> | <p>2:Sexual Harassment Reporting Procedure Manager. The training attendance was reviewed. The grievances mechanism training was conducted on 11/10/2023 at Mekassar Estate and 14/08/2023 at Detas Estate.</p> <p>Training on grievance/complaints mechanism was conducted to all workers at Mekassar Estate on 4/09/2023 while for other estates were also evident. The training covered 3 types of grievance/complaints mechanism which are (1) IOI Mesra (mobile app), (2) Employee Grievance Procedure (Green Book), and (3) Guidelines for Handling Harassment at Workplace. Training template and attendance list records were verified. Grievance procedures/guidelines, and step-by-step instructions of IOI Mesra app were displayed at the notice board of estate office and front door of workers' houses.</p> <p>Workers from various work sections at the Mekassar Estate (100% workers sampling) and Detas Estate (60% workers sampling) were interviewed from general worker, workshop, watchman, harvester, manurer, ramp attendance, buffalo caretaker, FFB drivers, mandore and checker. There was no complaints or issue raised by the interviewed workers related on verbal abuse, threats and intimidation. They also</p> |
|--|--|--|--|--|

RSPO PUBLIC SUMMARY

| | | | | |
|---------------------|-------|--|---|--|
| | | | <p>Please see the attachment:</p> <p>Appendix 6.5.1 (1) – Counselling and training session records for Assistant Manager</p> <p>Appendix 6.5.1 (2) – Records of apology session between Assistant Manager and workers</p> <p>Appendix 6.5.1 (3) – Records of engagement with workers by Sustainability Department</p> <p>Appendix 6.5.1 (4) – Records of training given by HR</p> <p>Appendix 6.5.1 (5) – Summary of IOI Mesra App report from Mekassar Estate after HR Training</p> <p>Appendix 6.5.1 (6) – Display of step-by-step procedure on how to use the IOI Mesra App (in various language).</p> | <p>understand the grievances mechanism as mentioned above.</p> <p>It was concluded that the IOI's Sustainable Palm Oil Policy (revised in Oct 2020) on prevention of harassment and Policy on Harassment at Workplace dated June 2018 was effectively implemented and complied with.</p> <p>With all the above, the corrective action carried out was accepted and the NC was closed.</p> <p>Status: Closed.</p> |
| 6.5.4 RZ 03 2023 | Minor | <p>Finding:</p> <p>1.The Company's Policy on Harassment at Workplace dated June 2018 has not been adequately and effectively communicated to all levels of workforce.</p> <p>2.Employees Grievance Procedure has not been implemented and communicated effectively to all levels of workforce.</p> <p>Objective evidence:</p> <p>1.33 foreign workers sampled and interviewed at Mekassar Estate raised their grievances against verbal abuse, threats and intimidation they received. However, the said workers did not utilize the grievance channels available to highlight their grievances. This, they claimed, was due to their perception that the existing grievance channels were ineffective in addressing their grievances.</p> <p>2. Workers at Mekassar Estate had grievances related to non-availability of transport to the nearest town, unlike their colleagues from other estates. However, this grievance was not brought up effectively to the Mekassar Estate management.</p> | <p>Root cause:</p> <p>Most of the workers in the Mekassar estate is still relatively new, which could probably be the most contributing factor on the trust issue on the company internal mechanism, along with ineffective training and briefing on the IOI Grievance procedure.</p> <p>Correction:</p> <p>Estate Management has been giving briefing/training on IOI's grievance procedures during JCC meetings, daily muster, posters on notice boards, linesite etc., especially to the new batch of workers who may have yet been received a training on the matter in details. Grievance procedures include Grievance book, ECC/JCC meetings, Hotline, Grievance App (IOI Mesra), Whistleblowing and communicating directly to operating center management etc.</p> | <p>The root cause and corrective action plan accepted; the effectiveness of implementation will be verified during the next audit.</p> <p>Status: Open</p> |

RSPO PUBLIC SUMMARY

| | | | | |
|--|--|--|--|--|
| | | <p>Therefore, Mekassar Estate could not demonstrate that the grievance mechanism contained in the Company's Policy on Harassment at Workplace dated June 2018 has been adequately and effectively communicated to the workers.</p> | <p>Corrective action: Human Resources (HR) Department has already been and will continue carrying out their workers engagement session and briefing regarding IOI Mesra App and whistleblowing policy to the workers. The programme will emphasize the effectiveness of using the grievance mechanism such as IOI Mesra App and Whistleblowing Policy which will be directly received and managed by HR Department.</p> <p>Sustainability Department will conduct regular visit to the operating centers for interview session and give briefing to workers to continuously verify their understanding and awareness regarding grievance procedure.</p> <p>Please see the attachment: Appendix 6.5.4 (1) – Records of training on grievance procedure Appendix 6.5.4 (2) – Records of training on IOI Mesra by HR departments Appendix 6.5.4 (3) – Photo of display IOI Grievance procedure at notice boards Appendix 6.5.4 (4) – Photo of display IOI Mesra SOP at notice boards</p> | |
|--|--|--|--|--|

RSPO PUBLIC SUMMARY

ATTACHMENT 5

STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

| P & C Indicator | Specification Major/Minor | Detail Non-conformances | Verification by Assessor |
|-----------------|---------------------------|---|---|
| 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> <ul style="list-style-type: none"> i. At Detas Estate: once a month i.e., 24/6/2022, 27/7/2022, 2/8/2022. ii. At Mekassar Estate: once a month i.e., 20/4/2022, 18/5/2022, 15/6/2022, 20/7/2022, 18/8/2022. 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>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> <ul style="list-style-type: none"> i. Detas Estate inadequately compared only the prices of eggs, chicken, sugar and cooking oil. ii. Mekassar Estate could not demonstrate that price comparison was carried out. | <p>During this surveillance audit, it was verified that the VMO, Dr Ahmad Basri bin Abdullah from Klinik Ikhwan & Surgeri, visits Mekassar, Merchong, Laukin A and Bukit Leelau estate clinics on a fortnightly basis.</p> <p>Similarly, price comparison of items sold in estate shops/canteens have also been consistently carried out by all units of operation to ensure the prices of items sold in estate shops are not exorbitant.</p> <p>Therefore, the Corrective Actions for the previous Minor Non-Compliance RZ 01 of 2022 have been consistently implemented.</p> <p>Status: closed</p> |
| 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</p> | <p>During the previous surveillance audit, a Major Non-Compliance was raised where it was found that the Company's existing SOP on MY EG Foreign Worker Permit Renewal has not been comprehensively established as it did not take into account variations to the normal procedures in permit and passport renewals of foreign workers. It was verified during this surveillance audit that the procedure has been</p> |

RSPO PUBLIC SUMMARY

| | | | |
|-------|-------|--|---|
| | | 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 workers' permits not being renewed within the stipulated timeframe. | established and consistently implemented throughout Bukit Leelau CU. It was further verified that foreign workers' permit renewals were made 3 months before the expiry and the progress of each renewal is being monitored. Status: closed |
| 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/l 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>The payroll documents for workers of Transport Contractors verified by the Auditor found information on compensation/renumeration of the workers were provided and adequate i.e. hence, in compliance with the Employment Act 1955 as evidenced by the following:.</p> <ol style="list-style-type: none"> 1. Statement of output (tonnage of FFB/Oil) recorded for the workers was provided in writing 2. Statement on the calculation of wages not detailed (i.e. Percentage X Output X FFB/oil Prices) was provided in writing and 3. Prevailing prices of product transported at the time of calculation was also provided in writing <p>Status: closed</p> |

RSPO PUBLIC SUMMARY

ATTACHMENT 6 – Timebound Plan [dated 19/05/2023]

Details of Time Bound Plan as submitted by IOI Plantation Services Sdn Bhd

| Name of the Unit of Certification (UoC) | Country | Name of the Mills and Supply Bases | Location Address | Certification Status (Certified / Not certified) | Plan Year for Certification | Actual Certification Year | Date of Last TBP Verified and Approved by CB | REVISION OF THE TBP (Only applicable when revision is made) | | | |
|---|----------|------------------------------------|--|--|-----------------------------|---------------------------|--|--|-------------------------------------|---------------------------------------|----------------------------|
| | | | | | | | | Revised TBP? (Yes / No) | New Proposed Year for Certification | Justification of changes for each UoC | Date of approval from RSPO |
| Pamol Kluang | Malaysia | Pamol Kluang POM | 8½ Mile, Mersing Road, 86007 Kluang, Johor, Malaysia. | Certified | | 2010 | 24/4/2022 | No | | | |
| | | Pamol Timur Estate | Kluang, Johor | Certified | | 2010 | 24/4/2022 | No | | | |
| | | Pamol Barat Estate | Kluang, Johor | Certified | | 2010 | 24/4/2022 | No | | | |
| | | Mamor Estate | Kluang, Johor | Certified | | 2010 | 24/4/2022 | No | | | |
| | | Unijaya Estate | Kluang, Johor | Certified | | 2010 | 24/4/2022 | No | | | |
| | | Kahang Estate | Kluang, Johor | Certified | | 2010 | 24/4/2022 | No | | | |
| | | Swee Lam Estate | Kluang, Johor | Certified | | 2010 | 24/4/2022 | No | | | |
| Bukit Leelau | Malaysia | Bukit Leelau POM | IOI Corporation Berhad Bukit Leelau Certification Unit KM 75, Kuantan Segamat Highway 26700 Muadzam Shah Pahang Darul Makmur | Certified | | 2010 | 29/12/2021 | No | | | |
| | | Bukit Leelau Estate | Muadzam Shah, Pahang | Certified | | 2010 | 29/12/2021 | No | | | |
| | | Detas Estate | Muadzam Shah, Pahang | Certified | | 2010 | 29/12/2021 | No | | | |
| | | Merchong Estate | Muadzam Shah, Pahang | Certified | | 2010 | 29/12/2021 | No | | | |
| | | Mekassar Estate | Muadzam Shah, Pahang | Certified | | 2010 | 29/12/2021 | No | | | |
| | | Leepang A Estate | Muadzam Shah, Pahang | Certified | | 2010 | 29/12/2021 | No | | | |

RSPO PUBLIC SUMMARY

| | | | | | | | | | | | |
|--------|----------|----------------------|--|-----------|--|------|------------|----|--|--|--|
| | Malaysia | Laukin A Estate | Muadzam Shah, Pahang | Certified | | 2010 | 29/12/2021 | No | | | |
| Gomali | Malaysia | Gomali POM | 5th Mile, Jalan Gemas-Batu Anam 85100 Segamat, Johor, Malaysia. | Certified | | 2010 | 24/8/2021 | No | | | |
| | | Gomali Estate | Segamat, Johor | Certified | | 2010 | 24/8/2021 | No | | | |
| | | Paya Lang Estate | Segamat, Johor | Certified | | 2010 | 24/8/2021 | No | | | |
| | | Tambang Estate | Segamat, Johor | Certified | | 2010 | 24/8/2021 | No | | | |
| | | Sagil Estate | Tangkak, Johor | Certified | | 2010 | 24/8/2021 | No | | | |
| | | Regent Estate | Gemencheh, Negeri Sembilan | Certified | | 2010 | 24/8/2021 | No | | | |
| | | Bahau Estate | Bahau, Negeri Sembilan | Certified | | 2010 | 24/8/2021 | No | | | |
| | | Kuala Jelai Estate | Durian Tunggal, Melaka | Certified | | 2010 | 24/8/2021 | No | | | |
| | | Bertam Estate | Jasin, Melaka | Certified | | 2010 | 24/8/2021 | No | | | |
| | | Jasin Lalang Estate | Karak, Pahang | Certified | | 2010 | 24/8/2021 | No | | | |
| Pukin | Malaysia | Pukin POM | KM 30, Lebuhraya Tun Abdul Razak, Keratong, 85007 Rompin, Pahang, Malaysia | Certified | | 2012 | 13/6/2022 | No | | | |
| | | Pukin Estate | KM 30, Lebuhraya Tun Abdul Razak, Keratong, 85007 Rompin, Pahang, Malaysia | Certified | | 2012 | 13/6/2022 | No | | | |
| | | Shahzan IOI 1 Estate | KM 30, Lebuhraya Tun Abdul Razak, Keratong, 85007 Rompin, Pahang, Malaysia | Certified | | 2012 | 13/6/2022 | No | | | |
| | | Shahzan IOI 2 Estate | KM 30, Lebuhraya Tun Abdul Razak, Keratong, 85007 Rompin, Pahang, Malaysia | Certified | | 2012 | 13/6/2022 | No | | | |
| | | Segamat Estate | KM 5, Jalan Segamat Muar, 85009 Segamat, Johor, Malaysia | Certified | | 2012 | 13/6/2022 | No | | | |
| | | Leepang A Estate | KM 68, Lebuhraya Segamat-Kuantan, | Certified | | 2012 | 13/6/2022 | No | | | |

RSPO PUBLIC SUMMARY

| | | | | | | | | | | | |
|-------------|----------|------------------------|--|-----------|--|------|-----------|----|--|--|--|
| | | | 26700 Muadzam Shah, Pahang, Malaysia | | | | | | | | |
| | Malaysia | Bukit Serampang Estate | KM 12, Jalan Sagil-Tangkak, 84900 Tangkak, Johor, Malaysia | Certified | | 2012 | 13/6/2022 | No | | | |
| Unico Group | Malaysia | Unico POM | 1.8 km Jalan Jeroco Off Mile 13, Lahad Datu Sandakan, Sandakan Highway, P.O Box 61532, 91123 Lahad Datu, Sabah, Malaysia | Certified | | 2018 | 5/7/2021 | No | | | |
| | | Unico 6 Estates | Unico Plantation Sdn. Bhd – Unico 6 MDLD 5123, KM3, Jalan Segama, 91100 Lahad Datu, Sabah, Malaysia | Certified | | 2018 | 5/7/2021 | No | | | |
| | | Ladang Asas Estates | M D L D 5123, KM3, Jalan Segama, 91100 Lahad Datu, Sabah, Malaysia | Certified | | 2018 | 5/7/2021 | No | | | |
| Unico Desa | Malaysia | Unico Desa POM | Unico Desa POM, KM3, Jalan Segama, 91100, Lahad Datu, Sabah | Certified | | 2018 | 16/5/2022 | No | | | |
| | | Unico 1 Estate | Unico-Desa Plantations Berhad - Unico 1 MDLD 5123, KM3, Jalan Segama, 91100 Lahad Datu, Sabah | Certified | | 2018 | 16/5/2022 | No | | | |
| | | Unico 2 Estate | Unico-Desa Plantations Berhad - Unico 2 MDLD 5123, KM3, Jalan Segama, 91100 Lahad Datu, Sabah | Certified | | 2018 | 16/5/2022 | No | | | |

RSPO PUBLIC SUMMARY

| | | | | | | | | | | | |
|---------|----------|------------------|--|-----------|--|------|------------|----|--|--|--|
| | Malaysia | Unico 3 Estate | Unico-Desa Plantations Berhad - Unico 3 MDLD 5123,KM3, Jalan Segama, 91100 Lahad Datu, Sabah | Certified | | 2018 | 16/5/2022 | No | | | |
| | | Unico 4 Estate | Unico-Desa Plantations Berhad - Unico 4 MDLD 5123,KM3, Jalan Segama, 91100 Lahad Datu, Sabah | Certified | | 2018 | 16/5/2022 | No | | | |
| | | Unico 5 Estate | Unico-Desa Plantations Berhad - Unico 5 MDLD 5123,KM3, Jalan Segama, 91100 Lahad Datu, Sabah | Certified | | 2018 | 16/5/2022 | No | | | |
| Morisem | Malaysia | Morisem POM | MDLD 5123, KM 2, Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia | Certified | | 2013 | 18/12/2021 | No | | | |
| | | Morisem 1 Estate | MDLD 5123, KM 2, Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia | Certified | | 2013 | 18/12/2021 | No | | | |
| | | Morisem 2 Estate | MDLD 5123, KM 2, Jalan Segama, Locked Bag No. 15, 91109 LahadDatu, Sabah, Malaysia | Certified | | 2013 | 18/12/2021 | No | | | |
| | | Morisem 3 Estate | MDLD 5123, KM 2, Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia | Certified | | 2013 | 18/12/2021 | No | | | |
| | | Morisem 4 Estate | MDLD 5123, KM 2, Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, | Certified | | 2013 | 18/12/2021 | No | | | |

RSPO PUBLIC SUMMARY

| | | | | | | | | | | | |
|---------|----------|------------------|---|-----------|--|------|------------|----|--|--|--|
| | Malaysia | Leepang 2 Estate | MDLD 5123, KM 2, Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia | Certified | | 2013 | 18/12/2021 | No | | | |
| Syarimo | Malaysia | Syarimo POM | KM23, Jalan Kinabatangan, Sg. Pin, Kinabatangan, Sabah <u>Postal Address:</u> MDLD 5123, KM 3 Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia. | Certified | | 2013 | 20/3/2022 | No | | | |
| | | Syarimo 1 Estate | Sg. Pin, Kinabatangan, Sabah <u>Postal Address:</u> MDLD 5123, KM 3 Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia. | Certified | | 2013 | 20/3/2022 | No | | | |
| | | Syarimo 2 Estate | Sg. Pin, Kinabatangan, Sabah <u>Postal Address:</u> MDLD 5123, KM 3 Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia. | Certified | | 2013 | 20/3/2022 | No | | | |
| | | Syarimo 3 Estate | Sg. Pin, Kinabatangan, Sabah <u>Postal Address:</u> MDLD 5123, KM 3 Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia. | Certified | | 2013 | 20/3/2022 | No | | | |

RSPO PUBLIC SUMMARY

| | | | | | | | | | | | |
|----------|----------|-------------------|---|-----------|--|------|-----------|----|--|--|--|
| | Malaysia | Syarimo 4 Estate | Sg. Pin, Kinabatangan, Sabah <u>Postal Address:</u> MDLD 5123, KM 3 Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia. | Certified | | 2013 | 20/3/2022 | No | | | |
| | | Syarimo 5 Estate | Sg. Pin, Kinabatangan, Sabah <u>Postal Address:</u> MDLD 5123, KM 3 Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia. | Certified | | 2013 | 20/3/2022 | No | | | |
| Baturong | Malaysia | Baturong POM | <u>Postal Address:</u> MDLD 5123, KM3 Jalan Segama, Lock Bag No 15, 91109, Lahad Datu, Sabah <u>Location Address:</u> KM 52, Jalan Kunak-Tawau, Off Road KM3, 91109 Lahad Datu, Sabah | Certified | | 2010 | 8/10/2021 | No | | | |
| | | Baturong 1 Estate | <u>Location Address:</u> KM 52, Jalan Kunak-Tawau, Off Road KM6, 91109 Lahad Datu, Sabah. | Certified | | 2010 | 8/10/2021 | No | | | |
| | | Baturong 2 Estate | <u>Location Address:</u> KM 52, Jalan Kunak-Tawau, Off Road KM25, 91109 Lahad Datu, Sabah. | Certified | | 2010 | 8/10/2021 | No | | | |

RSPO PUBLIC SUMMARY

| | | | | | | | | | | | |
|---------|----------|---------------------|--|-----------|--|------|------------|----|--|--|--|
| | Malaysia | Baturong 3 Estate | Location Address: KM 52, Jalan Kunak-Tawau, Off Road KM14, 91109 Lahad Datu, Sabah. | Certified | | 2010 | 8/10/2021 | No | | | |
| | | Cantawan Estate | Location Address: KM 20, Jalan Tungku-Lahad Datu, Off Road KM6, 91109 Lahad Datu, Sabah. | Certified | | 2010 | 8/10/2021 | No | | | |
| Leepang | Malaysia | Leepang POM | MDLD 5123, KM 2, Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia. | Certified | | 2013 | 16/12/2021 | No | | | |
| | | Morisem 5 Estate | MDLD 5123, KM 2, Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia. | Certified | | 2013 | 16/12/2021 | No | | | |
| | | Leepang 1 Estate | MDLD 5123, KM 2, Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia. | Certified | | 2013 | 16/12/2021 | No | | | |
| | | Leepang 5 Estate | MDLD 5123, KM 2, Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia. | Certified | | 2013 | 16/12/2021 | No | | | |
| | | Permodalan 1 Estate | MDLD 5123, KM 2, Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia. | Certified | | 2013 | 16/12/2021 | No | | | |
| | | Permodalan 2 Estate | MDLD 5123, KM 2, Jalan Segama, Locked Bag No. 15, 91109 Lahad Datu, Sabah, Malaysia. | Certified | | 2013 | 16/12/2021 | No | | | |

RSPO PUBLIC SUMMARY

| | | | | | | | | | | | |
|--------|----------|------------------|--|-----------|--|------|------------|----|--|--|--|
| Mayvin | Malaysia | Mayvin POM | Mayvin Incorporated Sdn Bhd, Mile 75, Sandakan/ Telupid Road, WDT No. 164, 90009 Sandakan, Sabah, Malaysia | Certified | | 2010 | 22/12/2021 | No | | | |
| | | Mayvin 1 Estate | Sri Mayvin Plantation Sdn Bhd, Mile 75, Sandakan/ Telupid Road, WDT No. 164, 90009 Sandakan, Sabah, Malaysia | Certified | | 2010 | 22/12/2021 | No | | | |
| | | Mayvin 2 Estate | Sri Mayvin Plantation Sdn Bhd, Mile 75, Sandakan/ Telupid Road, WDT No. 164, 90009 Sandakan, Sabah, Malaysia | Certified | | 2010 | 22/12/2021 | No | | | |
| | | Tangkulap Estate | Sri Mayvin Plantation Sdn Bhd, Mile 75, Sandakan/ Telupid Road, WDT No. 164, 90009 Sandakan, Sabah, Malaysia | Certified | | 2010 | 22/12/2021 | No | | | |
| | | Mayvin 5 Estate | Sri Mayvin Plantation Sdn Bhd, Mile 75, Sandakan/ Telupid Road, WDT No. 164, 90009 Sandakan, Sabah, Malaysia | Certified | | 2010 | 22/12/2021 | No | | | |

RSPO PUBLIC SUMMARY

| | | | | | | | | | | | |
|-------------|----------|-----------------|--|-----------|--|------|------------|----|--|--|--|
| | Malaysia | Mayvin 6 Estate | Sri Mayvin Plantation Sdn Bhd, Mile 75, Sandakan/ Telupid Road, WDT No. 164, 90009 Sandakan, Sabah, Malaysia | Certified | | 2010 | 22/12/2021 | No | | | |
| Sakilan | Malaysia | Sakilan POM | Mile 22, Sandakan/Telupid Road, WDT 164, 90009, Sandakan, Sabah, Malaysia. | Certified | | 2010 | 16/4/2022 | No | | | |
| | | Sakilan Estate | Sandakan, Sabah | Certified | | 2010 | 16/4/2022 | No | | | |
| | | Linbar 1 Estate | Sandakan, Sabah | Certified | | 2010 | 16/4/2022 | No | | | |
| | | Linbar 2 Estate | Sandakan, Sabah | Certified | | 2010 | 16/4/2022 | No | | | |
| Pamol Sabah | Malaysia | Pamol Sabah POM | Pamol Estates (Sabah) Sdn Bhd, Mile 122, Sandakan/Telupid Road, P.O Box 203, 90702, Sandakan, Sabah, Malaysia. | Certified | | 2016 | 30/11/2021 | No | | | |
| | | Ulu Estate | Mile 122, Sandakan/Telupid Road, P.O Box 203, 90702, Sandakan, Sabah, Malaysia. | Certified | | 2016 | 30/11/2021 | No | | | |
| | | Bayok Estate | Mile 122, Sandakan/Telupid Road, P.O Box 203, 90702, Sandakan, Sabah, Malaysia. | Certified | | 2016 | 30/11/2021 | No | | | |
| | | Rungus Estate | Mile 122, Sandakan/Telupid Road, P.O Box 203, 90702, Sandakan, Sabah, Malaysia. | Certified | | 2016 | 30/11/2021 | No | | | |
| | | Tindakon Estate | Mile 122, Sandakan/Telupid Road, P.O Box 203, 90702, Sandakan, Sabah, Malaysia. | Certified | | 2016 | 30/11/2021 | No | | | |

RSPO PUBLIC SUMMARY

| | | | | | | | | | | | |
|--------------|----------|--------------------|---|-----------|--|------|------------|----|--|--|--|
| | Malaysia | Nangoh Estate | Mile 122, Sandakan/Telupid Road, P.O Box 203, 90702, Sandakan, Sabah, Malaysia. | Certified | | 2016 | 30/11/2021 | No | | | |
| | | Meliau Estate | Mile 122, Sandakan/Telupid Road, P.O Box 203, 90702, Sandakan, Sabah, Malaysia. | Certified | | 2016 | 30/11/2021 | No | | | |
| | | Sugut Estate | Mile 200, Nangoh Paitan Road, P.O Box 203, 90702, Sandakan, Sabah, Malaysia. | Certified | | 2016 | 30/11/2021 | No | | | |
| Ladang Sabah | Malaysia | Ladang Sabah POM | Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah, Malaysia. | Certified | | 2013 | 10/4/2022 | No | | | |
| | | Bimbingan 1 Estate | Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah. | Certified | | 2013 | 10/4/2022 | No | | | |
| | | Bimbingan 2 Estate | Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah. | Certified | | 2013 | 10/4/2022 | No | | | |
| | | Labuk Estate | Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah. | Certified | | 2013 | 10/4/2022 | No | | | |
| | | Moynod Estate | Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah. | Certified | | 2013 | 10/4/2022 | No | | | |
| | | Luangmanis Estate | Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah. | Certified | | 2013 | 10/4/2022 | No | | | |
| | | Laukin Estate | Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah. | Certified | | 2013 | 10/4/2022 | No | | | |

RSPO PUBLIC SUMMARY

| | | | | | | | | | | | |
|-------------------------------|-----------|---------------------|--|---------------|------|------|-----------|-----|------|---|-----------|
| | Malaysia | Terusan Baru Estate | Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah. | Certified | | 2013 | 10/4/2022 | No | | | |
| | | Sungai Sapi Estate | Mile 45, Sandakan-Telupid Road, WDT 164, 90009, Sandakan, Sabah. | Certified | | 2013 | 10/4/2022 | No | | | |
| SNA Group | Indonesia | PT. SKS POM | West Kalimantan | Not Certified | 2021 | | 3/12/2022 | Yes | 2023 | Due to Pandemic and in the process of obtaining the complete HGU | 19/5/2023 |
| | | SKS 1 Estate | | | | | | | | | |
| | | SKS 2 Estate | | | | | | | | | |
| | | SKS 3 Estate | | | | | | | | | |
| | | BNS 1 Estate | | | | | | | | | |
| | | BNS 2 Estate | | | | | | | | | |
| | | BNS 3 Estate | | | | | | | | | |
| | | BNS 4 Estate | | | | | | | | | |
| | | BSS 1 Estate | | | | | | | | | |
| | | BSS 2 Estate | | | | | | | | | |
| | | BSS 3 Estate | | | | | | | | | |
| | | BSS 4 Estate | | | | | | | | | |
| | | KPAM 1 Estate | | | 2023 | | | No | 2024 | - | 4/11/2022 |
| | | KPAM 2 Estate | | | | | | | | | |
| | | KPAM 3 Estate | | | | | | | | | |
| | | KPAM 4 Estate | | | | | | | | | |
| IOI Pelita Plantation Sdn Bhd | Malaysia | Sejap Estate | Miri, Sarawak | Not Certified | 2025 | | Nov-21 | Yes | 2025 | Subject to the time required for land survey endorsement and land excised activities. | 19/5/2023 |