

**MONG RETHTHY INVESTMENT  
CAMBODIA OIL PALM CO. LTD. (MRICOP)**

RSPO Membership No: 1-0109-11-000-00

PLANTATION MANAGEMENT UNIT  
**MRICOP Grouping Palm Oil Mills &  
Estates**

Choeung Kor Commune, Prey Nop District,  
Sihanouk Province, Cambodia



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# Assessment Report

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## INTERTEK CERTIFICATION INTERNATIONAL SDN BHD

(188296-W)

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Annual Surveillance Assessment (ASA-03) cum Extension of Scope

### ANNUAL SURVEILLANCE ASSESSMENT (ASA-03) Cum EXTENSION OF SCOPE

#### ASSESSMENT REPORT

#### MONG RETHTHY INVESTMENT CAMBODIA OIL PALM CO. LTD. (MRICOP)

RSPO Membership No: 1-0109-11-000-00

PLANTATION MANAGEMENT UNIT  
**MRICOP Grouping Palm Oil Mills & Estates**  
Choeung Kor Commune, Prey Nop District, Sihanouk Province,  
Cambodia

**Certificate No:****RSPO 928088**

Issued date:

15 Aug 2012

Expiry date:

14 Aug 2017

**Assessment Type****Assessment Dates**

Initial Certification (Main Assessment)

24-28 Apr 2012

Extension of Scope

06 Aug 2012

Annual Surveillance Assessment (ASA-01)

22-25 Apr 2013

Annual Surveillance Assessment (ASA-02)

07-11 Jul 2014

Cum Extension of Scope

Annual Surveillance Assessment (ASA-03)

06-09 Jul 2015

Cum Extension of Scope

Annual Surveillance Assessment (ASA-04)

Re-Certification

**Intertek Certification International Sdn Bhd (formerly known as Moody International Certification (Malaysia) Sdn Bhd)**

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### 1.0 SCOPE OF ANNUAL SURVEILLANCE ASSESSMENT

#### 1.1 Introduction

This Annual Surveillance Assessment (ASA-03) cum Extension of Scope was conducted on the Plantation Management Unit (PMU) Mong Reththy Cambodia Oil Palm Co. Ltd. (hereafter abbreviated as MRICOP), from 06 - 09 July 2015, to assess if the organization's operations of the mill and its supply bases were in compliance against the RSPO Principles and Criteria (Apr 2013), Cambodian Local Indicators (2014) and the ratified requirements of RSPO Supply Chain Certification Standard (Nov 2014) for Palm Oil Mill.

The plantation management unit (PMU) or management unit of MRICOP grouping now comprises of two (2) palm oil mills and a common supply base of three (3) estates. The MRICOP grouping has met the eligibility criteria for a Multiple Mill certification as was confirmed by the RSPO Secretariat on 21 March 2015.

Thus the extension of scope assessment is to also verify compliance to the Multiple Mill Certification requirements.

#### 1.2 Location (address, GPS and map) of palm oil mill and estates

MRICOP grouping comprises of two (2) palm oil mills namely a) Monorum POM and b) Anlong Kropeu POM and three (3) estates as indicated in Table 1 below, which includes the addresses and GPS locations of the mill and estates. The Anlong Kropeu POM is a new mill included for extension to the scope of approval for Multiple Mill Certification during this assessment.

The location maps are provided in **Appendix C**.

**Table 1: Address of Palm Oil Mill, Estates and GPS Location**

Name	Address	GPS Reference	
		Latitude	Longitude
Monorum Palm Oil Mill Capacity: 30 MT/hour	Mong Reththy Investment Cambodia Oil Palm Co. Ltd., National Road 4, Monorum, Choeng Kor, Prey Nop, Preah Sihanouk Province, Cambodia.	10° 57' 34.9" N	103° 54' 28.2" E
Anlong Kropeu Palm Oil Mill Capacity: 45 MT/hour	MRT-TCC Sugar Investment Co. Ltd., National Road 4, Anlong Kropeu, Choeng Kor, Prey Nop, Preah Sihanouk Province, Cambodia.	10°49' 04.2" N	103°48' 33.1" E
Estate A (Tapoa)	National Road 4, Sangkat Cheung Kor, Khan Prey Nop, Preah Sihanouk Province, Kingdom of Cambodia.	10° 49' 04.2" N	103° 48' 33.1" E
Estate B (Svay)	National Road 4, Sangkat Cheung Kor, Khan Prey Nop, Preah Sihanouk Province, Kingdom of Cambodia.	10° 52' 15.5" N	103° 51' 05.3" E
Estate C (Anlong Kropeu)	National Road 4, Sangkat Cheung Kor, Khan Prey Nop, Preah Sihanouk Province, Kingdom of Cambodia.	10° 57' 34.9" N	103° 54' 28.2" E

#### 1.3 Description of supply base (fruit sources)

The supply base, i.e. FFB sources to the 2 mills under the MRICOP Grouping are entirely from the 3 common supplying estates as mentioned above.

Estate A and Estate B are owned by MRICOP whilst Estate C is managed by MRICOP but owned by MRT-TCC Sugar Investment Co., Ltd (MTSI). MTSI's shareholders are the Thai Charoen Corporation Group (TCC) Group

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and Mong Reththy Group (MRT) on a 75% and 25% ownership basis. Both MRICOP and MTSI are under the joint ownership of MRT Group and TCC Group.

FFB supply from Estate A and Estate B (under MRICOP) had commenced since year 2000, whilst supply from Estate C had commenced since year 2011. The necessary documentation and public notification under the RSPO New Planting Procedures for the extension of plantation development and supply from Estate C was submitted to RSPO on 15 May 2012 and was approved without any issues forthwith for the previous surveillance assessments. Further extension of scope was conducted as part of previous year's surveillance assessment ASA-02 for the increase in planted hectareage due to additional ongoing New Planting at Estate C. Public notification under the RSPO New Planting Procedures for the extension of plantation development of Estate C was submitted to RSPO on 06 Jun 2014 and was approved without any issues.

The supply base i.e. FFB sources to the POM PMU are from the abovementioned 3 estates only. Verification done on site during this Assessment confirmed that there were no out growers / independent suppliers / smallholders involved in the supply of FFB to the said PMU.

Details of the planted hectareage at MRICOP are as shown in Table 2 below.

**Table 2: Estate Area Summary**

Estate	Area Summary (ha) – Previous FY Jul 2013 / Jun 2014		Area Summary (ha) – Current FY Jul 2014 / Jun 2015	
	Certified Area	Planted Area	Certified Area	Planted Area
Estate A (Tapoa)	6,705.47	4,073.68	6,705.47	4,073.68
Estate B (Svay)	7,655.87	4,265.09	7,655.87	4,265.09
Estate C (Anlong Kropeu)	10,470.09	6,608.14	10,470.09	7,811.23
<b>Total:</b>	<b>24,831.43</b>	<b>14,946.91</b>	<b>24,831.43</b>	<b>16,150.00</b>

Notes:

1. This Annual Surveillance Assessment (ASA-03) covered the overall land use for oil palm plantation areas, and the identified Conservation areas including HCV areas marked out at the estates.
2. The estates sampled for this Annual Surveillance Assessment (ASA-03) have been selected based on their potential risks on social, environmental and biodiversity issues such as their proximity to forest reserves, hill sides, riparian zones and high conservation value areas.

### 1.4 Summary of plantings and cycle

The 3 estates have been developed beginning from 1997 and are still in the 1<sup>st</sup> cycle of planting. The age profile is as shown in Table 3.

**Table 3: Age Profile of Planted Oil Palm FY Jul 2014 / Jun 2015**

Estate Name	Year of Planting	Cycle of Planting	Mature OP (ha) – Above 3 years	Immature OP (ha) – 3 years & below
Estate A	1997-2008, 2010	1 <sup>st</sup>	4,073.68	0.00
Estate B	1997-2010, 2012	1 <sup>st</sup>	2,991.31	1,273.78
Estate C	2008-2010, 2011-2014 onwards	1 <sup>st</sup>	4,746.01	3,065.22
		<b>Total</b>	<b>11,811.00</b>	<b>4,339.00</b>

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### 1.5 Summary of Land Use, Conservation and HCV Areas

The summary of Land Use, Conservation and HCV Areas as identified in MRICOP during this Annual Surveillance Assessment is as shown in Table 4 below:

**Table 4: Conservation and HCV Areas**

#	Statement of Land Use (Ha) - Estate A, B and C	FY Jul 2013 / Jun 2014 (ASA-02) Hectarage – Ha	FY Jul 2014 / Jun 2015 (ASA-03) Hectarage – Ha
<b>1</b>	<b>Planted Area (ha) – Oil Palm</b>	14,946.91	16,150
	- Mature	9,795.38	11,811
	- Immature	5,151.53	4,339
<b>2</b>	<b>Conservation Area (ha)</b>		
	- comprising buffer zones along small streams, hilly areas, swampy and unplatable areas	2,051.41	2,051.41
<b>3</b>	<b>HCV Area (ha)</b>		
	- comprising buffer zones near forest reserves, water catchments, burial & religious sites	2.36	2.36

Notes:

- Significant portions of the land have been occupied by the local villagers and communities, for more than 5 years, which were left unplanted and maintained as such.
- Conservation areas are principally water bodies such as natural and dug up ponds and buffer zones along river tributaries and streams.
- The small HCV area is a Khmer soldiers' burial site in Estate C.

### 1.6 Other certifications held and Use of RSPO Trademarks

MRICOP PMU currently has no other certifications. The RSPO's trademarks and logo are not being used by the PMU audited. Instructions for use were provided and acknowledged by the PMU through a signed Memorandum of commitment agreeing to adhere to the latest "RSPO Rules on Communications & Claims".

### 1.7 Organizational information / Contact Person

Name: Mr. Sumate Pratumswan  
 Designation: Managing Director – Agricultural / Oil Palm  
 Full Address: Mong Reththy Investment Cambodia Oil Palm Co. Ltd  
 #52, St. 598 Sangkat Boeung Kak II, Khan Toul Kork, Phnom Penh, Cambodia.  
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### 1.8 Tonnages Verified for Certification

1.8.1 The breakdown of all the tonnages of FFB from the supply base to the 2 POMs respectively based on the reporting period for FY Jul 2014 / Jun 2015 are as follows:

**Table 5A: Total FFB tonnages for Monorum Mill (1 July 2014 – 30 June 2015)**

#	Estate /Supplier	FFB Processed (MT)	Main Receiving Mill	Certified By
1.	Estate A	45,779.53	MRICOP POM	Intertek
2.	Estate B	25,355.87	MRICOP POM	Intertek
3.	Estate C	8,904.69	MRICOP POM	Intertek
	<b>Total</b>	<b>80,040.09</b>		

**Table 5B: Total FFB tonnages for Anlong Kropeu Mill (1 July 2014 – 30 June 2015)**

#	Estate /Supplier	FFB Processed (MT)	Main Receiving Mill	Certified By
1.	Estate A	13,535.69	MTSI POM	Pending
2.	Estate B	8,187.72	MTSI POM	Pending
3.	Estate C	23,555.50	MTSI POM	Pending
	<b>Total</b>	<b>45,278.91</b>		

1.8.2. Total annual certifiable tonnages of FFB supplied to the MRICOP POMs during the previous assessment period, current surveillance period and next projected period are as follows:

**Table 6: Comparison of FFB Tonnages**

FFB Supplying Estates	FFB Processed in FY Jul 2013 / Jun 2014 Actual		FFB Processed in FY Jul 2014 / Jun 2015 Actual		FFB Processed for FY Jul 2015 / Jun 2016 Projected	
	MT	%	MT	%	MT	%
Estates A, B & C to Monorum POM - Certified	127,948.41	100	80,040.09	63.87	<b>41,355</b>	<b>30</b>
Estates A, B & C to Anlong Kropeu POM - Certifiable	NA	0	45,278.91	36.13	<b>96,495</b>	<b>70</b>
Other External Supplier - Uncertified	0	0	0	0	<b>0</b>	<b>0</b>
Total	127,948.41	100	125,319.00	100	<b>137,850</b>	<b>100</b>
SCCS Model for POMs	IP/SG		IP		IP	

Note: During this surveillance assessment the certified supply base was assessed against the requirements for the Identity Preserved (IP) Module as specified in RSPO Supply Chain Certification Standard (SCCS) for CPO mill. (See Section 3.1.1)

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1.8.3 The annual certifiable tonnages of CPO and PK production at the respective Mills from the supply base as assessed during the previous assessment period, current surveillance period and next projected period are as per the Tables below:

**Table 7A: Comparison of Certifiable CPO & PK Tonnages - Monorum Mill**

POM	FY Jul 2013 / Jun 2014 Actual		FY Jul 2014 / Jun 2015 Actual		FY Jul 2015 / Jun 2016 Projected	
Total Certifiable FFB Processed (MT)	127,948.41		80,040.09		41,355	
Total Certifiable CPO Production (MT)	IP 21,279.66	OER: 18.0%	14,543.08	OER: 18.17 %	7,526.61	OER: 18.20%
	SG 1,774.45					
Total Certifiable PK Production (MT)	IP 4,217.92	KER: 3.57%	3,008.10	KER: 3.76 %	1,571.49	KER: 3.80%
	SG 351.72					
SCCS Model for POM	IP/SG		IP		IP	

**Table 7B: Comparison of Certifiable CPO & PK Tonnages - Anlong Kropeu Mill**

POM	FY Jul 2013 / Jun 2014 Actual		FY Jul 2014 / Jun 2015 Actual		FY Jul 2015 / Jun 2016 Projected	
Total Certifiable FFB Processed (MT)	Not Applicable (NA)		45,278.91		96,495	
Total Certifiable CPO Production (MT)	NA	OER: NA	8,584.88	OER: 18.96%	18,334.05	OER: 19.0%
	NA					
Total Certifiable PK Production (MT)	NA	KER: NA	2,001.33	KER: 4.42%	4,342.28	KER: 4.5%
	NA					
SCCS Model for POM	-		IP		IP	

Note: The production data for FFB has been divided as the estates are currently supplying to both the Mills.

The total production output from the MRICOP grouping from the estates and mills are as per below:

**Table 7C: Comparison of Total Certifiable CPO & PK Tonnages**

POM	FY Jul 2013 / Jun 2014 Actual		FY Jul 2014 / Jun 2015 Actual		FY Jul 2015 / Jun 2016 Projected	
Total Certifiable FFB Processed (MT)	127,948.41		125,319		137,850	
Total Certifiable CPO Production (MT)	IP 21,279.66		23,127.96		25,860.66	
	SG 1,774.45					
Total Certifiable PK Production (MT)	IP 4,217.92		5,009.43		5,913.77	
	SG 351.72					
SCCS Model for POM	IP/SG		IP		IP	



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### 1.9 Time Bound Plan for Other Plantation Management Units

At present, there are no other management units owned under MRICOP.

### 1.10 Abbreviations Used

CB	Certification Body	KER	Kernel Extraction Rate
CLI	Cambodian Local Indicators	LTA	Lost Time Accidents
CHRA	Chemical Health & Risk Assessment	MRICOP	Mong Reththy Investment Cambodia Oil Palm Co. Ltd.
CPO	Crude Palm Oil	MSDS	Material Safety Data Sheets
CSDS	Chemical Safety Data Sheets	MTCS	Malaysia Timber Certification Scheme
CSPO	Certified Sustainable Palm Oil	MTSI	MRT-TCC Sugar Investment Pte. Ltd
CSPK	Certified Sustainable Palm Kernel	NCR	Non-Conformance Report
EFB	Empty Fruit Bunch	NGO	Non-Government Organization
EHS	Environmental Health & Safety	OER	Oil Extraction Rate
EIA	Environmental Impact Assessment	OHS	Occupational Health & Safety
ETP	Effluent Treatment Plant	PEFC	Programme for the Endorsement of Forest Certification
FFB	Fresh Fruit Bunch	PK	Palm Kernel
GAP	Good Agriculture Practice	PMU	Plantation Management Unit
HCV	High Conservation Values	POM	Palm Oil Mill
Intertek	Intertek Certification International Sdn Bhd	POME	Palm Oil Mill Effluent
IPM	Integrated Pest Management	PPE	Personal Protective Equipment
ISCC	International Sustainability & Carbon Certification	SCCS	Supply Chain Certification Standard
IUCN	International Union for Conservation of Nature	SOP	Standard Operating Procedures

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### 2.0 ASSESSMENT PROCESS

#### 2.1 Assessment Methodology, Plan and Site Visits

Since 3 June 2015, Intertek has initiated public communications and notifications and invited the relevant stakeholders before the assessment to provide feedback and comments on their concern (if any) on MRICOP regarding the environmental, biodiversity, community development and other relevant issues.

From 6 to 9 July 2015, the Assessment team of Intertek conducted the Annual Surveillance Assessment (ASA-03) cum Extension of Scope in which 2 out of the 3 estates of MRICOP namely Estate A and Estate C as well as the two (2) palm oil mills namely Monorum POM and Anlong Krapeu POM, were assessed for compliance against the RSPO requirements. The Extension of Scope is to verify compliance of changeover to the Multiple Mill Certification requirements to include the 2<sup>nd</sup> mill i.e. Anlong Krapeu POM into the MRICOP grouping.

The number of estates sampled was based on a minimum sample of  $0.8\sqrt{y}$  where y is the number of management sub-units and the selection was made based on their potential risks on social, environmental and biodiversity issues such as their proximity to forest reserves, hill sides, riparian zones and high conservation value areas.

During the on-site assessment, relevant documents and records, including Standard Operating Procedures (SOP), management plans, hectareage development, FFB, CPO and PK production, oil palm age profile, operational controls and measures, operational data and records, training records, etc. were reviewed and verified for compliance. The Assessment team using the process approach auditing technique covered the palm oil mill and estate operations, agricultural practices, pest management, pesticide and fertilizer application, occupational health and safety, social accountability, environment and other requirements. Stakeholders' interviews were conducted during the assessment and feedback obtained as part of information and evidence gathering. (See section 2.5 Process of stakeholder consultation).

MRICOP Palm Oil Mill was assessed against the requirements for the Identity Preserved (IP) Module as specified in RSPO Supply Chain Certification Standard (SCCS) for CPO mill. This part of the assessment covered the implementation of documented procedures, verification of processing and traceability of FFB into CPO and PK, and availability of records to demonstrate compliance against all the elements of the **Identity Preserved (IP) Module** in accordance with the RSPO Supply Chain Certification Standard (SCCS) requirements. Verified activities and checked items for the SCCS of the POM are reported in **section.3.1.1**.

After completion of the on-site field assessment, Intertek also performed the evaluation of conformity against the RSPO Certification System requirements for CB. The assessment report, findings and associated documents were evaluated through an independent review by the Intertek Internal Technical Reviewer/Panel prior to the approval of this report and decision on continued certification by Intertek.

The details of the Assessment Plan (actual on-site) are provided in **Appendix B**.

#### 2.2 Date of next scheduled visit

The next scheduled visit will be the Annual Surveillance Assessment (ASA-04) which will be carried out within the 9 to 12-months period from the date of initial issuance of the certificate.

#### 2.3 Qualifications of the Lead Assessor and Assessment Team

Competency details of the Lead Assessor and Assessment Team are given in **Appendix A**.

#### 2.4 Certification Body

Intertek Certification International Sdn Bhd [formerly known as Moody International Certification (Malaysia) Sdn Bhd] is part of the Intertek Group, which is a worldwide technical services organization dedicated to reducing clients' risks by providing technical inspection services, management system certification in quality, environmental, occupational safety & health and product certification, RSPO SCC, ISCC, Marine Sustainability Chain-of-Custody, MTCS and PEFC Chain-of-Custody certification in applicable industry sectors including the agricultural and forestry sectors. Intertek operates globally providing clients with a wide-ranging technical inspection expertise and access to thousands of skilled specialists worldwide. Intertek Group's certification business is ranked in the top 10 worldwide, and is available globally offering certification across a wide range of industries.

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### 2.5 Process of stakeholder consultation

Stakeholder consultations began with notification of the upcoming assessment through the websites of Intertek, MRICOP and RSPO. E-mails were sent to applicable stakeholders including government agencies, NGOs and local communities. Feedbacks received prior to the actual assessment on-site were followed up accordingly.

During the assessment, stakeholders were interviewed and their feedbacks were recorded. Among the stakeholders consulted were workers, trade union leaders, women representatives; local community leaders, representatives of government departments / agencies, NGOs, suppliers and contractors.

Details on stakeholders' feedback, PMU response and Intertek verification / comments are provided in **section 3.3**.

Among the list of key stakeholders consulted are the following:

#### Government Ministries / Agencies (by emails)

- |  |  |
|--|--|
| 1. Ministry of Agriculture, Forestry & Fisheries | 9. Ministry of Land                                      |
| 2. Ministry of Industry, Mines & Energy          | 10. Ministry of Economy & Finance                        |
| 3. Ministry of Health                            | 11. Ministry of Rural Development                        |
| 4. Ministry of Wildlife Protection               | 12. Ministry of Water resource and Meteorology           |
| 5. Ministry of Women Affairs                     | 13. Department of Forestry, Cambodia                     |
| 6. Ministry of Environment                       | 14. Department of Wildlife & Biodiversity, Cambodia      |
| 7. Ministry of Immigration                       | 15. Council for Agriculture and Rural Development (CARD) |
| 8. Ministry of Labour & Vocational Training      |  |

#### NGOs (by emails)

- |   |  |
|---|--|
| 16. World Wildlife Fund (WWF) Cambodia                                      | 35. Human Resource and Rural Economic Development Organization (Hurredo) |
| 17. Conservation International, Cambodia                                    | 36. Human Rights Vigilance of Cambodia (Vigilance)                       |
| 18. CEDEC, Cambodia   | 37. Indigenous Community Support Organization (ICSO)                     |
| 19. Association of Protection Development for Cambodia Environment (APDCE)  | 38. Khmer Community for Agricultural Development (KCAD)                  |
| 20. Cambodia Farmer Economic Development (CFED)                             | 39. Khmer Farmers Association (KFA)                                      |
| 21. Cambodian Human Rights and Development Association (ADHOC)              | 40. Khmer Institute for National Development (KIND)                      |
| 22. Cambodian Labour Organization (CLO)                                     | 41. Legal Aid of Cambodia (LAC)  |
| 23. Cambodian League for the Promotion & Defence of Human Rights (LICADHO)  | 42. NGO Committee on the Rights of the Child (NGO-CRC)                   |
| 24. Cambodian Rural Economic Development Organization (CREDO)               | 43. NGO Forum of Cambodia  |
| 25. Cambodian Sanitation and Recycling Organization (CSARO)                 | 44. Hand of God, Cambodia  |
| 26. Centre d'Etude et de Développement Agricole Cambodgien (CEDAC) Cambodia | 45. Wildlife Alliance, Cambodia  |
| 27. Conservation International (CI) Cambodia                                | 46. Organization for Assistance of Children and Rural Women (CWARO)      |
| 28. Cooperation for Development of Cambodia (Co-DeC)                        | 47. Provincial Governor of Sihanoukville                                 |
| 29. Culture and Environment Preservation Association (CEPA)                 | 48. Urban Poor Women Development (UPWD)                                  |
| 30. Development and Partnership in Action (DPA)                             | 49. Violence Against Women and Children of Cambodia (VAWCC)              |
| 31. Fisheries Action Coalition Team (FACT)                                  | 50. Wildlife Alliance Cambodia   |
| 32. Gender and Development for Cambodia (GAD/C)                             | 51. World Wide Fund (WWF) Cambodia (Phnom Penh)                          |
| 33. Healthcare Centre for Children (HCC)                                    |  |

#### Others interviewed during on-site assessment

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• Gender Committee Members</li> <li>• Workers representatives</li> <li>• Commune Heads</li> <li>• Village Heads</li> </ul> | <ul style="list-style-type: none"> <li>• School Principals</li> <li>• Clinic doctors</li> <li>• Suppliers / Contractors</li> <li>• Contractors (for field workers)</li> </ul> |
|---|---|

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### 3.0 ASSESSMENT FINDINGS

#### 3.1 Summary of findings

##### Principle 1: Commitment to transparency

<b>Criteria 1.1</b> Growers and millers provide 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.		
Indicators	Findings and Objective Evidence	Compliance
<b>1.1.1</b> There shall be evidence that growers and millers provide adequate information upon request for information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making.  <b>Minor Compliance</b>	Documented procedure SOP-GA-020 dated 02 Jan 2012 established and implemented for providing such information to relevant stakeholders upon request. The mill and estate management have responded constructively and promptly to requests for information from all stakeholders.  For the period Jul 2014 to Jun 2015, requests were recorded in the "Request and Response for Information and Site Visit" form and responded with actions such as road improvement for villagers and access to drinking water at the mills for contractors at the mills.	Complied
<b>1.1.2</b> Records of requests for information and responses shall be maintained.  <b>Major Compliance</b>	The PMU maintained an updated list of internal stakeholders, external stakeholders, government departments/agencies, consultants, contractors, suppliers, transporters, etc.  Stakeholders' consultation held with records of stakeholders' feedback (positive and negative), and management action plan recorded.	Complied
<b>Criteria 1.2</b> Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.		
Indicators	Findings and Objective Evidence	Compliance
<b>1.2.1</b> Management documents that are made available to the public shall include, but are not necessarily limited to: • Land titles/user rights (Criterion 2.2);  <b>Major Compliance</b>	The PMU had established & documented information of land titles, health and safety plan, plans and impact assessments relating to environment and social impacts, pollution prevention plans; details of complaints and grievances; negotiation procedures and continuous improvement plan that are available to the public and also for internal reference.  MRICOP website <a href="https://www.mricop.com.kh">https://www.mricop.com.kh</a> has a transparency statement that the various types of mandatory documents are publicly available.  Copies of the land titles were available and have been maintained at the Mill and estates: The lands in Estates A and B are via a Land Concession Contract dated 09/01/1996 between the Cambodian Ministry of Agriculture, Fishery and Forest (AFF) and MRICOP for a period of 70 years commencing 1997 with use of the lands for agriculture. Ownership of Estate C freehold land for agriculture use is via a purchase document dated 27/07/2011.  Additional lands in Estate C acquired in 2014 have complied with FPIC requirements (see also C2.3.1).	Complied

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<p>• Occupational health and safety plans (Criterion 4.7);</p> <p><b>Major Compliance</b></p>	<p>Detailed documented plan of OSH was reviewed and updated in Apr 2015. The Risk Assessment (Hazard Identification, Analysis and Risk Control) had included controls implemented at the new POM at Anlong Krapeu.</p> <p>Accident and Emergency Procedure SOP-GA-021, was available.</p> <p>OSH policy and plans were implemented and included activities such as:</p> <ul style="list-style-type: none"> <li>- OSH/ESG (Environment, Social, Gender Sub-committee).</li> <li>- Safe Work Practices / Safe Job Procedures</li> <li>- PPE at Mill and estates</li> <li>- Health medical check-up (annual)</li> <li>- Emergency preparedness</li> <li>- First Aid</li> <li>- Fire extinguisher</li> <li>- Ambulance services</li> </ul>	<p>Complied</p>
<p>• Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8);</p> <p><b>Major Compliance</b></p>	<p>Environmental and Social Impacts Assessment and Management Plans for the Mills and estates were reviewed in Apr 2015 and progressively implemented. The annual SEIA review was additional to the EIA/SIA carried out by Green Consultancy Group. Environmental impact improvement items included:</p> <ul style="list-style-type: none"> <li>- Environmental &amp; Biodiversity Policy stated (include zero burning, compliance with laws, HCV, Best Agriculture Practice).</li> <li>- Environmental Aspects and Impacts</li> <li>- Pollution Prevention &amp; Mitigation Plans</li> </ul> <p>Social impact improvement items included:</p> <ul style="list-style-type: none"> <li>- Stakeholder consultations on land ownership, availability of resources (firewood, water &amp; road access)</li> <li>- Employment opportunity &amp; wages</li> <li>- Contribution to the community (sports facilities &amp; festivities)</li> <li>- Housing for workers</li> </ul>	<p>Complied</p>
<p>• HCV documentation summary (Criteria 5.2 and 7.3);</p> <p><b>Major Compliance</b></p>	<p>Based on the internal SEIA survey and evaluation, there was only a small HCV area at this PMU, which is the Khmer soldiers' burial site.</p> <p>The New Planting area in Estate C did not contain any HCV as reported by the Environmental/HCV consultant report dated 06 Jun 2014.</p> <p>It is verified during current assessment on site that there is no change to the HCV area.</p>	<p>Complied</p>
<p>• Pollution prevention and reduction plans (Criterion 5.6);</p> <p><b>Major Compliance</b></p>	<p>Pollution Prevention &amp; Mitigation Plans for the POMs were reviewed on 7 &amp; 10 Apr 2015 for both mills.</p> <p>Key pollutants such as discharge to water ways, emissions to air, contamination to land, and noise pollution were identified.</p> <p>Action Plans, Monitoring and Management Program, Continuous Improvement Plans for pollution prevention identified, implemented and monitored.</p> <p>Pollution Prevention Plan for MRICOP Plantation Estates A, B &amp; C were reviewed on 14 – 16 Apr 2015.</p>	<p>Complied</p>

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	<p>Documented pollution prevention and reduction plans include measures for pollution control, pesticides reduction, plantation waste management, schedule wastes and domestic wastes disposal, reuse and recycling.</p> <p>Action Plans, Monitoring and management Program, Continuous Improvement Plans for pollution prevention identified, implemented and monitored.</p>	
<p>• Details of complaints and grievances (Criterion 6.3);</p> <p><b>Major Compliance</b></p>	<p>Complaints and grievances process flowchart and its details are defined in SOP-GA-019.</p> <p>MRICOP has included the necessary details including identifying a corporate representative / coordinator, for handling complaints and grievance.</p> <p>For the period Jul 2014 to Jun 2015, the complaints received from field conductors and workers at the estates for increase in wages due to higher cost of living were responded by management. Adjustment of the salary and wage structure based upon the years of service and skill level was verified from the pay slips and records sighted during assessment.</p>	Complied
<p>• Negotiation procedures (Criterion 6.4);</p> <p><b>Major Compliance</b></p>	<p>Negotiation process flowchart and its details are defined in SOP-GA-022.</p> <p>MRICOP has applied the process for land acquisition and compensation for the land bought from the villagers in Estate C that complied with FPIC requirements (see 2.3.1).</p>	Complied
<p>• Continual improvement plans (Criterion 8.1);</p> <p><b>Major Compliance</b></p>	<p>The PMU has identified and implemented Continuous Improvement Plans for both the POM and Estates.</p>	Complied
<p>• Public summary of certification assessment report;</p> <p><b>Major Compliance</b></p>	<p>Public summary of certification assessment reports are available in the company website. These reports may be available from the company upon request.</p>	Complied
<p>• Human Rights Policy (Criterion 6.13).</p> <p><b>Major Compliance</b></p>	<p>The Human Rights Policy was documented on 19 June 2015 and communicated to all levels of the workforce and operations. Copies of the policy found to be displayed at prominent locations in the POMs and estates.</p> <p><b>Action was taken on Observation: OCL-01 issued previously in 2014 (ASA-02).</b></p>	Complied
<p><b>Criteria 1.3</b> Growers and millers commit to ethical conduct in all business operations and transactions.</p>		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
<p><b>1.3.1</b> There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.</p> <p><b>Minor Compliance</b></p>	<p>The Policy of commitment to a Code of Ethical Conduct and Integrity was documented on 19 June 2015 and signed by the MRT-TCC Group CEO. The policy was communicated to all levels of the workforce and operations. Copies of the policy found to be displayed at prominent locations in the POMs and estates.</p> <p><b>Action was taken on Observation: OCL-02 issued previously in 2014 (ASA-02).</b></p>	Complied



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### Principle 2: Compliance with applicable laws and regulations

<b>Criteria 2.1</b> There is compliance with all applicable local, national and ratified international laws and regulations.		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
<p><b>2.1.1</b> Evidence of compliance with relevant legal requirements shall be available.</p> <p><b>Major Compliance</b></p>	<p>Compliance with land titles and user rights evidenced from the Land Concession Contract dated 09/01/1996 between the Cambodian Ministry of Agriculture, Fishery and Forest (AFF) and MRICOP for Estates A and B and land ownership of Estate C freehold lands via a purchase document with land titles.</p> <p>Environmental and Social Impact Assessments confirmed activities to be in compliance with laws and sub decrees related to environment and social issues. Licenses and permits for operations are valid and displayed at the Monorum and Anlong Kropeu POMs respectively.</p> <p>A list of applicable laws and sub decrees is available and reviewed, at least annually for updates by the Head of Quality &amp; Sustainability Management (Mr. Khiev Sothy). No change in laws for the period Jul 2014 to Jun 2015.</p> <p>Based on the site observations, interviews and records checking at the field and mill, there were evidences of compliance with the applicable local, national laws and legal requirements detailed in the Cambodia Local Indicators.</p> <p>Cambodia is listed by the United Nations as under the 'Least Developed Country' – LDC status and is exempted from full compliance with the applicable ratified International Conventions.</p>	Complied
<p><b>2.1.2</b> A documented system, which includes written information on legal requirements, shall be maintained.</p> <p><b>Minor Compliance</b></p>	<p>The listing of all the relevant laws applicable included the international laws and conventions ratified by the Cambodian government are documented in the Legal Register.</p>	Complied
<p><b>2.1.3</b> A mechanism for ensuring compliance shall be implemented.</p> <p><b>Minor Compliance</b></p>	<p>MRICOP has established a documented system explaining the mechanism for identifying, determining, reviewing and updating applicable legal and other requirements that the PMU has subscribed (Document Ref. rev06, 2014 "Mechanism for Implementation of Legal Requirements and System for Tracking Changes in the Law).</p> <p>MRICOP's SOPs provides the mechanism for the implementation of the applicable laws. Monitoring of compliance by departments and RSPO Sustainability Core Team.</p> <p>Operating licenses and permits were displayed, renewed and evidenced to be valid. Statutory returns were settled and receipts filed were sighted.</p> <p>Based on the site observations, interviews and records updated, the system used is appropriately tracking the operations at the PMU.</p>	Complied
<p><b>2.1.4</b> A system for tracking any changes in the law shall be implemented.</p> <p><b>Minor Compliance</b></p>	<p>Monitoring of changes to the applicable laws and regulations carried out through periodical review in accordance with the documented procedure/mechanism and last performed on 01 Jul 2015.</p>	Complied
<p><b>Criteria 2.2</b> The right to use the land is demonstrated, and is not legitimately contested by local people who can</p>		

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demonstrate that they have legal, customary or user rights.

Indicators	Findings and Objective Evidence	Compliance
<p><b>2.2.1</b> Documents showing legal ownership or lease, history of land tenure (confirmation from community leaders based on history of customary land tenure, recognised Native Customary Right (NCR) land) and the actual legal use of the land shall be available.</p> <p><b>Major Compliance</b></p>	<p>Legal ownership of the land and land tenure for Estates A and B as evidenced by the Land Concession Contract between the Cambodian Ministry of Agriculture, Fishery and Forest (AFF) and MRICOP dated 09/01/1996 for a period of 70 years commencing 1997 with use of the lands for agriculture. There is no further land dispute in Estates A and B. Legal ownership of Estate C freehold land for agriculture use evidenced by a purchase document dated 27/07/2011. Estate C was previously cultivated with sugarcane.</p> <p>The original copies are maintained by the corporate head office. The legal use of the land was confirmed for agricultural use. Copies of land titles verified to be in order.</p>	Complied
<p><b>2.2.2</b> There is evidence that physical markers are located and visibly maintained along the legal boundaries adjacent to state land, NCR land and reserves.</p> <p><b>Minor Compliance</b></p>	<p>It was verified that there has been no change to the stated land titles and designated use for agricultural use.</p> <p>Boundary stones including other markers such as roads and trenches were found to be visually maintained and were within the perimeters as indicated in the land concession/title. The audit team verified that no planting was done beyond the legal boundary.</p> <p>Legal boundary markers were sighted and maintained along the perimeters of estate lands which were mapped with a differential Global Positioning System (GPS).</p>	Complied
<p><b>2.2.3</b> Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC).</p> <p><b>Minor Compliance</b></p>	<p>The mechanism to solve the land conflict is established and in place (SOP-GA-22 Land Compensation and Negotiation Procedure Flow Chart).</p> <p>MRICOP had initiated negotiation and compensation process to resolve some land compensation claims with villagers at Estate C in 2013-2014. There was evidence of satisfactory resolution of the claims was reported in the previous assessment (see 2.3.1). It is verified that there are currently no new land compensation claims.</p>	Complied
<p><b>2.2.4</b> There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved.</p> <p><b>Major Compliance</b></p>	<p>Confirmed that there are no significant land conflicts. There is no new claim in the year 2015.</p>	Complied
<p><b>2.2.5</b> For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities and relevant authorities where applicable).</p> <p><b>Minor Compliance</b></p>	<p>The process of participatory mapping was seen in the resolution of the claims reported in the previous assessment (see 2.3.1).</p>	Complied
<p><b>2.2.6</b> To avoid escalation of conflict, there shall be no evidence that oil palm operations have instigated violence in maintaining peace and order in their current and planned operations.</p> <p><b>Major Compliance</b></p>	<p>There was no instigated violence seen in the resolution of the claims reported in the previous assessment.</p>	Complied
<p><b>Criteria 2.3</b> Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free,</p>		



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prior and informed consent.		
Indicators	Findings and Objective Evidence	Compliance
<p><b>2.3.1</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p><b>Major Compliance</b></p>	<p>There are no customary lands in the concession areas (Estate A and B) and legally owned land (Estate C). Cultivation of oil palm in these lands has not diminished any legal rights of villagers either.</p> <p>The claims for compensation by some villagers for an area of 979.90 ha in Estate C have been resolved as seen in the resolution of the claims reported in the previous (ASA-02) assessment.</p> <p>It is verified that there are currently no new land compensation claims in 2015.</p>	<p>Complied</p>
<p><b>2.3.2</b> Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include:</p> <p>a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making;</p> <p>b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken;</p> <p>c) Evidence that the legal, economic, environmental and social implications for 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 company's title, concession or lease on the land.</p> <p><b>Minor Compliance</b></p>	<p>Mapping of the lands involved the land acquisition was jointly carried out with the villagers agreeable to selling the lands. Negotiated agreements, transfer of lands and full payment complied with the process and requirements of FPIC were properly resolved as was reported in the previous assessment (see 2.3.1).</p>	<p>Complied</p>
<p><b>2.3.3</b> All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p><b>Minor Compliance</b></p>	<p>Relevant information pertaining to the land acquisition mentioned and legal arrangements, including transfer of legal land titles were found available as was reported in the previous assessment.</p>	<p>Complied</p>
<p><b>2.3.4</b> Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel.</p> <p><b>Major Compliance</b></p>	<p>For the land acquisition mentioned above, the villagers were represented by the Village Head of their own choosing as was reported in the previous assessment.</p>	<p>Complied</p>

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### Principle 3: Commitment to long-term economic and financial viability

Criteria 3.1 There is an implemented management plan that aims to achieve long-term economic and financial viability.		
Indicators	Findings and Objective Evidence	Compliance
<p><b>3.1.1</b> A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders.</p> <p><b>Major Compliance</b></p>	<p>Verified that presently, there is only one PMU owned by MRICOP.</p> <p>Currently the MRICOP grouping comprise of 2 POMs and 3 common supply base estates (Estates A, B and C) which still meet the requirements of 4.2.3 and 4.2.4 of RSPO Certification Systems Standard. There are no scheme smallholders in the PMU.</p> <p>The Management cum Business Plans has documented details of the 5-year Cash Flow Budgets for year 2015 to 2019 covering the 2 mills and estates A, B and C.</p> <p>The management plans included items such as the planted areas, areas for harvesting, FFB harvesting (MT FFB/ha), CPO production, %OER, PK production, %KER, revenue, direct costs, indirect costs, net profit, development costs and net cash flow.</p> <p>Mill operational budget/cost include production, maintenance and renewal of permits.</p> <p>Estate operational budget/cost in Estates A, B and C include labour, transport, agrochemicals, fertilizers and other costs documented for operations such as spraying, slashing, weeding, drainage, manuring mulching, pruning, pest disease control, roads and bridges construction and maintenance. New planting, Immature and Mature estate areas upkeep cost/ha and Harvesting cost.mt were also documented.</p> <p>The budget also provided for annual social and environmental programs.</p>	<p>Complied</p>
<p><b>3.1.2</b> An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available.</p> <p><b>Minor Compliance</b></p>	<p>Annual replanting programme had been projected up to year 2022 subject to yearly review. Currently, no replanting is required as first planting started in year 1997.</p>	<p>Complied</p>

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### Principle 4: Use of appropriate best practices by growers and millers

<b>Criteria 4.1</b> Operating procedures are appropriately documented, consistently implemented and monitored.		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
<b>4.1.1</b> Standard Operating Procedures (SOPs) for estates and mills shall be documented.  <b>Major Compliance</b>	The mills and the estates had a copy each of the Standard Operating Procedures and these had been verified to be in order.	Complied
<b>4.1.2</b> A mechanism to check consistent implementation of procedures shall be in place.  <b>Minor Compliance</b>	The mechanism to check the implementation of SOPs was available. Records had been kept by the staff concerned for each operation to monitor the procedure and progress of work, and these records would be checked by the Assistant Manager and the Manager regularly. These records had been verified to indicate satisfactory implementation during the visit.	Complied
<b>4.1.3</b> Records of monitoring and any actions taken shall be maintained and available, as appropriate.  <b>Minor Compliance</b>	The records of monitoring and the actions taken had been maintained for more than 12 months on Monorom mill and estates concerned. Anlong Kropeu mill started trial run in 2 <sup>nd</sup> half of 2014, and records had been maintained since then. These records had been verified to be satisfactory.	Complied
<b>4.1.4</b> The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB).  <b>Major Compliance</b>	The mills only processed the crop from the group estates.	Complied
<b>Criteria 4.2</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
<b>4.2.1</b> There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible.  <b>Minor Compliance</b>	GAP for minimization of soil erosion and maintenance of soil fertility is maintained via the frond stacking and fertilizer application as per the recommendations provided by the Ministry of Agriculture and Fishery, Cambodia in the earlier years, and then by Prince of Songkla University, Songkla, Thailand this year.  On Estate C, Cover crop planting was in progress for 2014 new planting. Planting of cover crop was delayed in 2014 due to long dry spell from Dec 2014 to March, 2015.	Complied
<b>4.2.2</b> Records of fertiliser inputs shall be maintained.  <b>Minor Compliance</b>	Records of fertilizer application had been verified to be in order.	Complied
<b>4.2.3</b> There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status.  <b>Minor Compliance</b>	Leaf sampling and analysis had been carried out annually to determine the nutrient levels for fertilizer recommendations that aimed to sustain the long term soil fertility and nutrient efficiency  For 2015, leaf sampling and analysis had been carried out by Faculty of Natural Resources, Prince of Songkla University, Thailand.  Soil survey and analysis for Estate C and Estate A had been carried out in February, 2015 by Agricultural Technical Service Provider from Phnom Penh, and report on the survey was completed in June, 2015.	Complied

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<p><b>4.2.4</b> A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting.</p> <p><b>Minor Compliance</b></p>	<p>EFB had been applied around the palm circle in the 2014 new planting on Estate C.</p> <p>Monorom Mill POME land application had been carried out in Estate B, Div B3 Blocks Y and Z in Feb, March, April and September, 2014 over 15.45 ha.</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: left;">Block</td> <td style="text-align: left;">Ha.</td> </tr> <tr> <td>Y1</td> <td>1.06</td> </tr> <tr> <td>Y2</td> <td>2.82</td> </tr> <tr> <td>Z1</td> <td>6.38</td> </tr> <tr> <td>Z2</td> <td>5.19</td> </tr> </table> <p>Anlong Kropeu Mill – POME land application budgeted in Field S14, P 14, O 11, O 12, N12, on Estate C over 161.07 ha. Application for approval from the respective authority was in progress.</p> <p>To-date, only 48.72 ha was applied with POME. There will be an increase in the applied area when the furrows are ready in the fields concerned.</p>	Block	Ha.	Y1	1.06	Y2	2.82	Z1	6.38	Z2	5.19	<p>Complied</p>														
Block	Ha.																									
Y1	1.06																									
Y2	2.82																									
Z1	6.38																									
Z2	5.19																									
<p><b>Criteria 4.3</b> Practices minimise and control erosion and degradation of soils.</p>																										
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>																								
<p><b>4.3.1</b> Maps of any fragile/marginal soils shall be available.</p> <p><b>Major Compliance</b></p>	<p>Soil map showing 453.52 ha of fragile soil in Divisions C2 and C3 on estate C and in Division A1 and A2 on estate A had been verified.</p> <p>Fragile soil areas in ha:</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th style="text-align: center;">Div C2</th> <th style="text-align: center;">Div C3</th> <th style="text-align: center;">Div A1</th> <th style="text-align: center;">Div A2</th> <th style="text-align: center;">Total ha</th> </tr> </thead> <tbody> <tr> <td>Estate C</td> <td style="text-align: center;">219.40</td> <td style="text-align: center;">234.12</td> <td style="text-align: center;">--</td> <td style="text-align: center;">--</td> <td style="text-align: center;">453.52</td> </tr> <tr> <td>Estate A</td> <td style="text-align: center;">--</td> <td style="text-align: center;">--</td> <td style="text-align: center;">10</td> <td style="text-align: center;">11.57</td> <td style="text-align: center;">21.57</td> </tr> <tr> <td><b>Grand Total</b></td> <td></td> <td></td> <td></td> <td></td> <td style="text-align: center;"><b>475.09</b></td> </tr> </tbody> </table> <p>Mitigating measures such as planting of leguminous cover crop, application of EFB, stacking of fronds, and fertilizer applications had been planned and carried out as and when applicable to improve the soil conditions.</p>		Div C2	Div C3	Div A1	Div A2	Total ha	Estate C	219.40	234.12	--	--	453.52	Estate A	--	--	10	11.57	21.57	<b>Grand Total</b>					<b>475.09</b>	<p>Complied</p>
	Div C2	Div C3	Div A1	Div A2	Total ha																					
Estate C	219.40	234.12	--	--	453.52																					
Estate A	--	--	10	11.57	21.57																					
<b>Grand Total</b>					<b>475.09</b>																					
<p><b>4.3.2</b> A management strategy shall be in place for plantings on slopes between 9 and 25 degrees unless specified otherwise by the company's SOP.</p> <p><b>Minor Compliance</b></p>	<p>Planting terraces had been constructed on land with slope &gt; 10°. Records and maps on terraces constructed had been verified on Estate C.</p> <p>On Estate A, the estate's topography was generally flat and therefore no terrace was required.</p> <p>There was no soil erosion noted during the visit.</p>	<p>Complied</p>																								
<p><b>4.3.3</b> A road maintenance programme shall be in place.</p> <p><b>Minor Compliance</b></p>	<p>Road maintenance programme and work done records had been verified to be in order.</p>	<p>Complied</p>																								
<p><b>4.3.4</b> Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place.</p> <p><b>Major Compliance</b></p>	<p>There was no peat soil on estates A, B and C. This had been confirmed during field visit. Thus this is not applicable.</p>	<p>Not applicable</p>																								
<p><b>4.3.5</b> Drainability assessments where necessary will be conducted prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing.</p> <p><b>Minor Compliance</b></p>	<p>As above.</p>	<p>Not applicable</p>																								

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<p><b>4.3.6</b> A management strategy shall be in place for other fragile and problem soils (e.g. podzols and acid sulphate soils).</p> <p><b>Minor Compliance</b></p>	<p>There was no acid sulphate soil on Estates C and A. Frond stacking and fertilizer application based on foliar analysis were carried out to maintain the soil fertility.</p>	<p>Complied</p>
<p><b>Criteria 4.4</b> Practices maintain the quality and availability of surface and ground water.</p>		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
<p><b>4.4.1</b> An implemented water management plan shall be in place.</p> <p><b>Minor Compliance</b></p>	<p>Water management plan was in place and verified to be in order.</p>	<p>Complied</p>
<p><b>4.4.2</b> Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated.</p> <p><b>Major Compliance</b></p>	<p>Buffer zones which were marked at the estates were maintained with no application of agrochemicals for the protection of the water courses.</p>	<p>Complied</p>
<p><b>4.4.3</b> Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, shall be in compliance with national regulations (Criteria 2.1 and 5.6).</p> <p><b>Minor Compliance</b></p>	<p>In Monorom Palm Oil Mill, water samples had been taken at monthly interval before land application (Feb to April, 2014) or at the discharge point of effluent pond only when there was discharge of effluent. Samples had been taken for February, March, April and from June to September, 2014. BOD levels had been in the range of 24 ppm in July and 195 ppm in March with an average of 95 ppm for the year 2014. The upper limit specified by Cambodian Government was 500 ppm for land application and 80 ppm for discharge to water way.</p> <p>In Anlong Kropeu Mill, BOD levels were between 115 ppm (Dec 2014) and 440 ppm (Apr 2015). BOD figures were high due to running of new mill, and facilities for POME treatment were still in progress due to teething problems.</p>	<p>Complied</p>
<p><b>4.4.4</b> Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored.</p> <p><b>Minor Compliance</b></p>	<p>In Monorom Mill, monitoring of water usage in the mill averaged at 2.68 m<sup>3</sup>/tonne FFB for 2014.</p> <p>The level of water usage was high in Monorom Mill compared to the industrial norm due to supply for domestic consumption had been included with the use of only one water meter.</p> <p>In Anlong Kropeu Mill, the water consumption was averaging at 0.74 m<sup>3</sup>/tonne FFB.</p>	<p>Complied</p>
<p><b>Criteria 4.5</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.</p>		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
<p><b>4.5.1</b> Implementation of Integrated Pest Management (IPM) plans shall be monitored.</p> <p><b>Major Compliance</b></p>	<p>Records on planting of beneficial plants had been verified on the estates.</p> <p>Pest infestation was minimal on the estates.</p> <p>Programme for planting of beneficial plants such as <i>Cassia cobanensis</i>, and <i>Antigonon leptopus</i>, and records on areas planted had been verified together with the respective maps to be satisfactory.</p>	<p>Complied</p>
<p><b>4.5.2</b> Training of those involved in IPM implementation shall be demonstrated.</p>	<p>Training records for personnel on IPM implementation were available and was verified on-site to be satisfactory</p>	<p>Complied</p>



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<b>Minor Compliance</b>	during field assessment.	
<b>Criteria 4.6</b>		
Pesticides are used in ways that do not endanger health or the environment.		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
<p><b>4.6.1</b> Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available.</p> <p><b>Major Compliance</b></p>	Written justification in Standard Operating Procedures of all agrochemicals use had been reviewed and found acceptable.	Complied
<p><b>4.6.2</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided.</p> <p><b>Major Compliance</b></p>	Records of pesticides and their active ingredients used, LD50, area treated, amount of a.i. applied per ha, and number of applications had been maintained and kept since 2011. Verified that records of monitoring were satisfactorily.	Complied
<p><b>4.6.3</b> Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in industry's Best Practice.</p> <p><b>Major Compliance</b></p>	It had been the policy of the estates to minimize the use of pesticides in accordance with integrated pest management. No prophylactic use of pesticides had been carried out at the estates for the period concerned.	Complied
<p><b>4.6.4</b> 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, except in specific situations identified in industry's Best Practice. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances. Pesticides selected for use are those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations (2000).</p> <p><b>Minor Compliance</b></p>	It is the policy of the group to discontinue the use of Paraquat since February, 2012. Verified that this policy has been adhered to on-site.	Complied
<p><b>4.6.5</b> Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7).</p> <p><b>Major Compliance</b></p>	<p>All pesticide operators had been given training on the handling and application of the pesticides. Appropriate safety and application equipment had been provided and used by the operators.</p> <p>All precautions attached to the products had been observed, applied, and understood by the workers.</p> <p>Programme and training records had been verified to be satisfactory.</p>	Complied
<p><b>4.6.6</b> Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). Pesticides shall be stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders, Pesticides Act 1974 (Act 149) and Regulations.</p>	Storage of pesticides found to be in accordance with the Occupational Safety and Health Laws and Regulations and local laws on pesticides control.	Complied



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<b>Major Compliance</b>		
<p><b>4.6.7</b> Application of pesticides shall be by proven methods that minimise risk and impacts.</p> <p><b>Minor Compliance</b></p>	<p>Pesticides had been applied using the proven methods (Best Management Practices) that minimize risk and impacts.</p>	Complied
<p><b>4.6.8</b> Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application.</p> <p><b>Major Compliance</b></p>	<p>The PMU does not practice aerial application of pesticides. This practice has been adhered.</p>	Complied
<p><b>4.6.9</b> Evidence of continual training to enhance knowledge and skills of employees and associated smallholders on pesticide handling shall be demonstrated or made available. (see Criterion 4.8).</p> <p><b>Minor Compliance</b></p>	<p>Periodic training on pesticide handling had been carried out. Information on the pesticides displayed on the notice board and next to the pesticides in the store.</p>	Complied
<p><b>4.6.10</b> Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3).</p> <p><b>Minor Compliance</b></p>	<p>Drums had been punctured with holes at bottom and kept in the store.</p> <p>Some of the 20 litre drums were reused for holding diluted chemical mixture for spraying.</p> <p>The mills are also keeping the containers for hazardous chemicals in the store until the relevant authority comes out with a guideline on the procedure for disposal.</p>	Complied
<p><b>4.6.11</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated.</p> <p><b>Major Compliance</b></p>	<p>Estate C had sent 50 workers on 22-6-2015, 3 on 29-6-2015 for medical surveillance.</p> <p>Monorom Mill sent 4 workers on 29-6-2015 for medical surveillance</p> <p>Estate A sent 36 workers on 13-6-2015 for medical surveillance.</p> <p>Anlong Kropeu Mill sent 2 workers on 20-6-2015 and 11 workers on 4-6-2015 for medical surveillance</p> <p>The medical results have indicated that all the workers were still fit to perform their respective work including the pesticide sprayers.</p> <p><b>Action was taken on Observation: CFK-01 issued previously in 2014 (ASA-02).</b></p>	Complied
<p><b>4.6.12</b> No work with pesticides shall be undertaken by pregnant or breast-feeding women.</p> <p><b>Major Compliance</b></p>	<p>Verified from records, field and mill inspections and interviews that no pregnant or breast-feeding woman had been offered work which required her to handle hazardous chemicals.</p>	Complied
<p><b>Criteria 4.7</b> An occupational health and safety plan is documented, effectively communicated and implemented.</p>		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
<p>The occupational health and safety plan shall cover the following:</p> <p><b>4.7.1</b> An occupational health and safety policy shall be in place. An occupational health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.</p> <p><b>Major Compliance</b></p>	<p>Occupational Safety and Health (OSH) plan in compliance with OSH Act and Factory Machinery Act was documented and implemented.</p> <p>OSH policy was clearly displayed at POM and in estates office. Workers had demonstrated awareness towards occupational safety and health policy.</p> <p>Risk assessment carried out on all operations where health and safety is an issue (e.g. noise exposure, pesticides/chemicals exposure, accident, fire).</p> <p>POM &amp; its estates established their accident reporting</p>	Complied



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	<p>KPI, and incident monitoring implemented.</p> <p>Procedures and actions documented and implemented on the issues concerned.</p> <p>Awareness and training programmes planned for year 2015 was consistently implemented. Evidence of training on safe working practices for workers involved in pesticides spray, use of fire extinguishers, awareness &amp; understanding of MSDS/CSDS, First Aid boxes were sighted at both POM &amp; estates.</p> <p>Precautions attached to products properly observed and applied to workers in all estates</p> <p>Appropriate PPE (safety boots, safety helmets, rubber boots, cartridge masks, safety goggles, gloves) verified to be provided. Ear protective device put on by workers working at engine rooms POM.</p> <p>There were records maintained for the yearly audiometric test conducted for the listed mill workers.</p> <p>The results indicated that there were no issues of any hearing impairment suffered by the workers.</p> <p>Companies had provided the appropriate PPE at the place of work to cover all potentially hazardous operations such as pesticides application, and harvesting.</p> <p>The Safety &amp; Health officer was responsible for overall in charge of safety and health planning, operation &amp; coordination.</p> <p>Adequate fire extinguisher and hose reels found to be located at strategic locations, operational and maintained in good conditions.</p> <p>Training for estate workers in First Aid was carried out in 2015 and records maintained. A total of 77 fire extinguishers were utilized at strategic areas in the POM and Estates. First Aid equipment was available at POM, estates and at worksite. Samples of First Aid boxes were checked and contents found to be complete and in usable order, i.e. at Estate C and Estate A when harvesting and weeding activities were in progress during field visit.</p>	
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<p><b>4.7.2</b> All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.</p> <p><b>Major Compliance</b></p>	<p>All operations had been risk assessed, documented and implemented.</p> <p>All precautions attached to the products had been observed and applied to the workers through MSDS. However during the field inspection some practices were observed to be non-complying.</p> <p><b>Thus a Nonconformance was issued as follows:</b></p> <ul style="list-style-type: none"> <li>- In Field J20 and Field N20 on Estate C, the harvesters did not wear safety helmet although they had been provided with it.</li> <li>- On 7-7-2015, while travelling along the government road next to Estate B from Sihanouk Veil to Estate C office, it was noted that a group of harvesters were harvesting the tall palms with sickle, and they were not wearing safety helmet.</li> <li>- On 8-7-2015, in Field F6 and Field H4 on Estate A, where activities such as FFB harvesting, slashing of woody plants, and road side pruning of fronds were in progress, most of the workers were not wearing protective hand gloves.</li> <li>- Estate A Management did not provide safety helmet to visitors visiting the field where safety helmet would be needed e.g. tall palm harvesting area, as a safety precautionary measure.</li> </ul>	<p style="text-align: center;"><b>Major NC# CFK-01</b></p>
<p><b>4.7.3</b> All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.</p> <p><b>Major Compliance</b></p>	<p>Awareness and training programme had been carried out.</p> <p>All workers involved had been adequately trained in safe working practices.</p> <p>Appropriate PPE had been provided to all workers at the place of work to cover all potentially hazardous operations.</p>	<p style="text-align: center;">Complied.</p>
<p><b>4.7.4</b> The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.</p> <p><b>Major Compliance</b></p>	<p>At the Monorom and Anlong Kropeu Mills; and Estates A and C, regular OSH meetings between responsible persons and the workers had been carried out at quarterly intervals.</p> <p><b>Thus, Major NC: CFK-01 issued in 2014 (ASA-02) had been effectively closed.</b></p>	<p style="text-align: center;">Complied</p>
<p><b>4.7.5</b> Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.</p> <p><b>Minor Compliance</b></p>	<p>Accident and emergency procedures had been written and briefed to staff, workers, contractors and visitors.</p> <p>Workers trained in First Aid were present in the mill and field operations.</p> <p>Records on all accidents had been verified to be maintained satisfactorily.</p> <p>Quarterly review on accident cases had been carried out during quarterly meeting of Environment, Safety, &amp; Health (ESH)</p> <p><b>First Aid Kits were available at the Mills and estates. It is noted that several items were used but regular checking not recorded. Also there was no list of items for checking and topping up of the medicines in the kits.</b></p>	<p style="text-align: center;"><b>Observation# CFK-01.</b></p>

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	<b>Thus an Observation: CFK-01 was raised.</b>	
<p><b>4.7.6</b> All workers shall be provided with medical care, and covered by accident insurance.</p> <p><b>Minor Compliance</b></p>	<p>Medical care had been provided to all the workers.</p> <p>Local workers are covered by National Social Security Fund.</p> <p>Cambodia-Vietnam Insurance PLC healthcare insurance had been provided to the staff in addition to NSSF.</p>	Complied
<p><b>4.7.7</b> Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics.</p> <p><b>Minor Compliance</b></p>	<p>Records on Lost Time Accident (LTA) metrics had been verified to be satisfactory.</p>	Complied
<p><b>Criteria 4.8</b> All staff, workers, smallholders and contract workers are appropriately trained.</p>		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
<p><b>4.8.1</b> A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme.</p> <p><b>Major Compliance</b></p>	<p>A formal training programme on all aspects of RSPO Principles and Criteria has been established and implemented.</p> <p>Training for various categories of operators, including all field and office staff, with regards to their duties and training needs had been reviewed and found acceptable.</p>	Complied
<p><b>4.8.2</b> Records of training for each employee shall be maintained.</p> <p><b>Minor Compliance</b></p>	<p>Records for training attended by individual employee had been verified.</p> <p><b>Action was taken on Observation: CFK-02 issued previously in 2014 (ASA-02).</b></p>	Complied

### Principle 5: Environmental responsibility and conservation of natural resources and biodiversity

<p><b>Criteria 5.1</b> Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p>		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
<p><b>5.1.1</b> An environmental impact assessment (EIA) shall be documented.</p> <p><b>Major Compliance</b></p>	<p>Documentation on the SEIA for Monorum POM, Estates A, B and C done in 2011 was available and maintained.</p> <p>Additional SEIA for the Anlong Kropeu POM was also documented in Nov 2014 by a locally recognized EIA consultant company i.e. Green Consultancy Group Ltd, Cambodia.</p> <p>The SEIA reports were reviewed in April 2015 and were noted to have covered the impacts on the extended planting areas at Estate B and Estate C. The Cambodian Sub-Decree No-72 (Environmental Impact Assessment) was also referred to in the report.</p> <p>Contents of the EIA report had included the following matters:</p> <ul style="list-style-type: none"> <li>• The laws related to environment and pollution.</li> <li>• Positive and negative impacts of aspects were assessed with mitigation plans.</li> <li>• The soils with geology and parent materials were documented.</li> <li>• The polluting activities with direct impact on water bodies and air.</li> <li>• The wildlife, flora and fauna and its classification of rare, threatened and endangered species (RTE) potentially existing in and around the vicinity of the</li> </ul>	Complied

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<p><b>5.1.2</b> Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive action plan. The action plan shall identify the responsible person/persons.</p> <p><b>Minor Compliance</b></p>	<p style="text-align: center;">extended areas.</p> <p>Environmental aspects &amp; impact risk assessment were carried out and covered in the Environmental Management and Monitoring Plans at both the Mills and estates. The plans were sufficiently comprehensive and persons responsible i.e. the respective Mill Managers and Estate Managers were identified.</p> <p>The plans had included the aspects and impacts identified from field activities that include fertilizing, spraying, transportation of FFB, garbage disposal and road maintenance. Action plans and recommendations in order to mitigate negative effects and promote positive ones such as sewage, landfills and conservation activities applicable to the entire PMU was monitored.</p>	<p style="text-align: center;">Complied</p>
<p><b>5.1.3</b> This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p> <p><b>Minor Compliance</b></p>	<p>The documented environmental plans and monitoring of operational changes was reviewed on an annual basis. Implementation on the effectiveness of mitigation measures was also reviewed.</p> <p>Reviews were done by the respective Mill Managers and Estate Managers for year 2015.</p> <p>Details of daily operational activities and its aspects of negative and positive impacts including fertilizer usage, pesticide spraying, waste disposal and environmental emissions at the mills and estates.</p> <p>At both the Mills, the monitoring of air quality emissions from the stack discharge had commenced and reports made available for year 2014. For year 2015, it is to be conducted in August 2015.</p> <p><b>Action was taken on Observation: AL-01 Item (1) issued previously in 2014 (ASA-02).</b></p> <p><b>However, action taken on Observation: AL-01 Item (2) issued previously in 2014 (ASA-02) was not effective. Thus, a non-conformance was issued (see Minor NC# SH-02 against Indicator 5.3.3).</b></p>	
<p><b>Criteria 5.2</b> The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.</p>		
<p><b>Indicators</b></p>	<p><b>Findings and Objective Evidence</b></p>	<p><b>Compliance</b></p>
<p><b>5.2.1</b> Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).</p> <p><b>Major Compliance</b></p>	<p>The EIA report of Sep 2011 and supplementary done in Nov 2014 was done by Green Consultancy Group Ltd. The reports were made available at site.</p> <p>HCV report of Mar 2012 was done by RSPO panel approved HCV consultant, i.e. EnvironLogic Consultancy, which included Estate C (MTSI) in the report. Report was available.</p> <p>Conservation and HCV areas were identified at the mills and estates with estimated size/ hectare indicated.</p> <p>The monitoring and annual review of Conservation and HCV areas via the Environmental Management &amp; Monitoring Plan was conducted and documented on 18 June 2015.</p>	<p style="text-align: center;">Complied</p>
<p><b>5.2.2</b> Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation</p>	<p>Regular patrols within the PMU estates i.e. at least once monthly had been carried out and recorded by the Estate executives or Assistant Managers to monitor the</p>	

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<p>or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through an action plan.</p> <p><b>Major Compliance</b></p>	<p>Conservation / buffer zone areas and RTE species(if any). However, at both Estates, A and C, it was discovered that although the buffer zone signage was placed at the relevant affected areas, the extent of the boundary for the buffer was not clearly demarcated on the ground. As an example, a stream running across plot M15 at Estate C, there were no buffer zones allocated and there were no clear demarcation on the extent of the area on the ground. A number of significant buffer zones areas in Estate A were also discovered not demarcated on the ground. In addition, a small hill at Estate C was not identified as Conservation area. Although signboards for conservation areas, buffer zones and signages that prohibit hunting, fishing and water polluting activities were available on site, it was found to be insufficient. As example, there was no signage placed at the border of the community forest at Estate C.</p> <p><b>Thus a Nonconformance was issued as follows:</b></p> <p><b>a) Buffer zones and markers at the following locations are not adequately mapped out and demarcated:</b></p> <p><b>i) Conservation area i.e. small Hill (Estate C)</b> <b>ii) Water Reservoirs (Estate C)</b> <b>iii) New Effluent ponds (Estate C)</b></p> <p><b>b) Signages sharing boundary near Community Forest areas are not sufficient constructed and clearly placed.</b></p>	<p style="text-align: center;"><b>Major NC# SH-01</b></p>
<p><b>5.2.3</b> There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instituted in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species.</p> <p><b>Minor Compliance</b></p>	<p>The estates management has undertaken appropriate measures to control any illegal or inappropriate hunting, fishing or collecting activities within the estates. 'Conservation Zone' signages and "no hunting" policy were prominently displayed and verified to be maintained during field visit.</p> <p>See also C 5.2.4.</p> <p>The programme to regularly educate the plantation workers about the status of RTE species was established with ongoing consultation with the local wildlife authorities. The latest training was conducted on the 23 June 2015 and attended by majority of the workers.</p>	<p style="text-align: center;">Complied</p>
<p><b>5.2.4</b> Where an action plan has been created there shall be ongoing monitoring:</p> <ul style="list-style-type: none"> <li>• The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported;</li> <li>• Outcomes of monitoring shall be fed back into the action plan.</li> </ul> <p><b>Minor Compliance</b></p>	<p>Environmental Management &amp; Monitoring Plan had included monitoring at the Conservation &amp; HCV areas for potential RTE such rare species of birds (as per the list of MAFF 2007) in the concession areas of Estate A, B &amp; C e.g. Siamese Fireback and Chestnut-Headed Partridge and wildlife such as the nocturnal Slow Loris (under the IUCN list).</p> <p>The occasional sightings of various types of wildlife encountered e.g. wild boars and peacocks were recorded.</p> <p>The review of the management plan was conducted on 18<sup>th</sup> June 2015 and had considered additional measures such as creating more awareness and educating the workers and village community on conservation efforts. Awareness briefing was done by Safety, Health &amp; Environment personnel.</p>	<p style="text-align: center;">Complied</p>
<p><b>5.2.5</b> Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these</p>	<p>It was verified that there has been no instance of HCV set-aside that conflicts with the rights of local communities at the PMU.</p> <p>Thus agreement of such nature was not required.</p>	<p style="text-align: center;">Complied</p>

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rights.	The Local Community forest at Cheung Ka Lo village is located some 20 km away from the PMU Estate C.	
<b>Minor Compliance</b>		
<b>Criteria 5.3</b>		
Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
<p><b>5.3.1</b> All waste products and sources of pollution shall be identified and documented.</p> <p><b>Major Compliance</b></p>	<p>Documentation on the identification of all the waste products such as scheduled waste, domestic waste , clinical waste and recyclable waste such as metal, plastic, mill waste and polluting materials e.g. EFB, POME, stack emissions and Boiler ashes were maintained and monitored at the PMU.</p> <p>Segregation of wastes i.e. general wastes and scheduled wastes was verified to be satisfactory. Proper storage areas were identified for the storage of the recyclable wastes.</p> <p>The mills and estates also have a proper Scheduled Waste Store for storing scheduled waste.</p>	Complied
<p><b>5.3.2</b> All chemicals and their containers shall be disposed of responsibly.</p> <p><b>Major Compliance</b></p>	<p>The management has identified the listing of all the types of wastes at the mills and estates.</p> <p>Scheduled wastes such as used engine and filter oils were kept separately in a schedule waste store. A record is kept on the quantity of used oil stored at the waste store.</p> <p>Rags and empty filters were also stored in the same scheduled waste store. Used vehicle batteries were kept in a separate store.</p> <p>Empty pesticide containers were kept in another store.</p> <p>The empty fertilizer bags were stored separately. Empty fertilizer bags were reused for the collection of loose fruits.</p> <p>Workshops were noted to be using drip trays (oil spillage containment pits) at the time of changing of oil.</p> <p>It has been verified that scheduled wastes were not mixed with domestic wastes.</p>	Complied

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<p>5.3.3 A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.</p> <p><b>Minor Compliance</b></p>	<p>Waste management and disposal plan has been documented since 2011.</p> <p>Controls for the storage and disposal of items under scheduled or hazardous wastes have been adequately implemented. Waste disposal contractors are monitored. Currently, the local Cambodian laws have no specific requirements for disposal of scheduled wastes, (including used High Density Polyethylene – HDPE, pesticide containers) for the plantation sectors.</p> <p>Recycling of crop residues / biomass i.e. EFB and POME had been implemented. Management EFB application plans and progress reports were verified to be satisfactory.</p> <p>No discharge of POME directly into any water sources or rivers was observed. POME is 100% dried and recycled for use as fertilizer application in the fields.</p> <p>Landfills for domestic waste are located away from water bodies. Methods of disposal e.g. landfill locations /size and recycling methods or methods for reduction of pollution were documented and monitored.</p> <p>Landfills for the disposal of domestic waste were provided at the Estate A and C. It was noted that most of the landfills allocated were fenced. However, there were 2 landfills which were not fenced and found to be unsuitably located i.e. at the Monorum Mill (where the dumpsite was not fenced and located just by the side of the main road) and at Estate A -Division A1 (which is not fenced and located just about 100 meters from the main road).</p> <p><b>Thus a Nonconformance was issued as follows: Landfills for domestic waste disposal are not adequately managed i.e. location is not proper with inadequate signages and littering at i) Estate A (Division A1) and ii) near Monorum Mill (Mill 1).</b></p>	<p><b>Minor NC# SH-02</b></p>
<p><b>Criteria 5.4</b> Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
<p>5.4.1 A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored.</p> <p><b>Minor Compliance</b></p>	<p>The use of energy in the palm oil mills and line site was monitored monthly to compare the energy usage against the production of CPO. Electricity generation was through steam turbine and boiler where Palm fiber and PK shells were used as renewable energy/fuel on a 65:35 ratio basis.</p> <p>Monthly records of energy consumption of non-renewable and renewable fuel per metric tonne of palm product at the POM were available. .</p> <p>At POM, average energy usage for 2014 was at 29.77kWh/mt FFB processed and current average as of Jun 2015 is at 28.08 kWh/mt FFB processed.</p> <p>Average diesel usage for mill process operations from Jan – Jun 2015, was ranging between 3.42 and 4.12 liter / mt FFB. Increases were noted to be due to increase in FFB crop supply and processing. It was verified that energy usage was monitored and data compiled at the POM for comparison and control.</p> <p>At the estate, diesel consumption per metric ton FFB was also monitored on a monthly basis.</p>	<p>Complied</p>
<p><b>Criteria 5.5</b> Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.</p>		



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Indicators	Findings and Objective Evidence	Compliance
<p><b>5.5.1</b> There shall be no land preparation by burning, other than in specific situations as identified in the <i>'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003</i>, or comparable guidelines in other regions.</p> <p><b>Major Compliance</b></p>	<p>The 'No Open Burning' policy established by MRICOP PMU established since 2011 has been maintained at the mill and estates. The management has suitable fire fighting plans, equipments and facilities for new planting areas. Fire prevention belts are prepared during drought season along the boundaries. Fire trucks with water pumps and engines remained on standby in case of any incidence of fire outbreak.</p> <p>The management continues to maintain support for any fire control of surrounding and neighboring villagers, when needed or requested.</p>	Complied
<p><b>5.5.2</b> Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in <i>'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003</i>, or comparable guidelines in other regions.</p> <p><b>Minor Compliance</b></p>	<p>The PMU has adhered to the 'zero burning' policy.</p> <p>There was no replanting at the estates.</p> <p>There was no evidence of any burning of domestic waste at the housing line sites and at the sanitary landfills of the estates during on site field assessment.</p>	Complied
<p><b>Criteria 5.6</b> Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</p>		
Indicators	Findings and Objective Evidence	Compliance
<p><b>5.6.1</b> An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4).</p> <p><b>Major Compliance</b></p>	<p>The PMU had reviewed the environmental impact assessment on potential pollution to air, water and contamination on land on annual basis. The latest Environmental Impact Assessment, management, action plans were conducted on 13 March 2015.</p> <p>POME treatment, monitoring and land application is monitored and records maintained.</p>	Complied
<p><b>5.6.2</b> Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented.</p> <p><b>Major Compliance</b></p>	<p>Significant pollutants and greenhouse gas (GHG) emissions were identified, e.g. POME, diesel / fuel, fertilizer and pesticide usage have been documented and maintained at the PMU. Plans to reduce or minimise them were available and progressively implemented.</p> <p>Pollution Mitigation plan complete with all identified polluting activity has been prepared in accordance with local regulations and sub-decree.</p> <p>Sources of pollution included stack emissions, boiler ash and run off and control measures needed were identified. Mitigation plan include the reduction of air pollutant emission with the new boiler installed at the Monorum mill in Mar 2011. Latest report on emission monitoring at the 2 mills was on July 2014. For the year 2015, it is expected to be conducted in August 2015.</p> <p>It was verified that the POME is treated in the aerobic, anaerobic ponds prior to final discharge point.</p> <p>Water samples were regularly taken at the Mills and estates and tested by Government recognised external lab at Phnom Penh. Latest report on the water analysis conducted by Food and Chemical Services was documented on 8 June 2015. Analysis reports are reviewed by respective mill and estate managers. Records are maintained and verified on-site.</p>	Complied

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<p><b>5.6.3</b> A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools.</p> <p><b>Minor Compliance</b></p>	<p>The monitoring system for significant pollutants was implemented and data compiled and reviewed on a monthly basis by the respective mill and estate managers. However implementation using the RSPO PalmGHG tool had not been adequately followed. <b>Action taken on Observation: AL-02 issued previously in 2014 (ASA-02) was not adequate.</b></p> <p><b>Thus a Nonconformance was issued as follows:</b></p> <p><b>Greenhouse gas (GHG) calculations using RSPO PalmGHG is not the latest version to be used i.e. version 2.1.1 and the data has not yet been submitted to RSPO for review and endorsement by RSPO prior to the audit.</b></p>	<p><b>Minor NC# AL-01</b></p>
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**Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers**

<p><b>Criteria 6.1</b> Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p>		
Indicators	Findings and Objective Evidence	Compliance
<p><b>6.1.1</b> A social impact assessment (SIA) including records of meetings shall be documented.</p> <p><b>Major Compliance</b></p>	<p>A review and update of the initial 2012 SIA and a SIA dated 2014 has been done on 18 June 2015.</p> <p>Documented minutes of meeting are available to evidence the review.</p>	<p>Complied</p>
<p><b>6.1.2</b> There shall be evidence that the assessment has been done with the participation of affected parties.</p> <p><b>Major Compliance</b></p>	<p>Participation of affected parties is evident with a documented participant list and photographs of meeting. The participants include the internal and external stakeholders which include the employees, contractors, representatives from national park and community forest, local village heads, cattle farmers, medical doctor, school teachers and government organizations such as police chief and military commander.</p>	<p>Complied</p>
<p><b>6.1.3</b> Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.</p> <p><b>Major Compliance</b></p>	<p>The 2015 updated and timetabled SIA Implementation and Monitoring Plan is maintained to promote the positive impacts and to mitigate the negative ones. Estate and mill managers of affected areas are responsible for implementation and monitoring of the plan.</p> <p>Assessment verified that mitigation and monitoring of the water quality at various points continue as planned. 6 samples were collected and sent to a reliable center for analysis on 30/1/15. The reports show 0 coliform but the lead and mercury levels exceed the acceptable range. Minutes of meeting dated 17/6/15 show that a water treatment plan has been developed after consultation with experts. Offering of proposed contracts worth about 15,000USD is now in progress.</p> <p>Continued promotion of the positive impacts is evident on document review and during site visits. Some of the findings are as follows:</p> <p>1. Interview with the local deputy governor at the public</p>	<p>Complied</p>



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	<p>forum (held in a temple) confirmed that the organization's continued participative assistance has helped all remaining affected parties in the villages to obtain their rightful land titles in 2014 and 2015.</p> <p>2. Local communities such as the neighboring villagers and suppliers are allowed have free access and use of estate roads.</p> <p>3. Villagers collect grass cuttings to use as fodder for their cattle.</p> <p>4. Cattle are allowed to graze freely as agreed in the stakeholder meeting.</p> <p>5. The operations of the new mill in Estate C since 2014 have provided more work opportunities to the local villagers. Interviews with village heads have confirmed that more work opportunities are provided and youths need not travel out of the local community to find work elsewhere.</p> <p>6. The wage rate for basic, semi skill and skill workers have increase since January this year in relation to the increased cost of living. Interview with workers confirmed this positive implementation has helped them ease the rising living cost significantly. (There is no stated minimum wage for plantation workers currently).</p> <p>7. Interview with primary school teachers and review of relevant records evidence the continued implementation of the 20 USD monthly financial assistance to teachers in the village schools.</p> <p>8. Review of records and related photographs evidence a positive response to requests made for maintenance of class rooms and building of teachers' quarters at a nearby village school.</p>	
<p><b>6.1.4</b> The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties.</p> <p><b>Minor Compliance</b></p>	<p>SIA management plan was reviewed annually in Apr 2015 and additional stakeholder consultations were held in June 2015 with affected parties and necessary changes were updated. Implementation on the resulting programs was ongoing and monitored at defined intervals as evidenced during audit.</p>	<p>Complied</p>
<p><b>6.1.5</b> Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme).</p> <p><b>Minor Compliance</b></p>	<p>Presently there are no smallholder schemes at the PMU.</p>	<p>Not applicable</p>
<p><b>Criteria 6.2</b> There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.</p>		
<p><b>Indicators</b></p>	<p><b>Findings and Objective Evidence</b></p>	<p><b>Compliance</b></p>
<p><b>6.2.1</b> Consultation and communication procedures shall be documented.</p> <p><b>Major Compliance</b></p>	<p>The established General Negotiation Procedure - SOP GA 022 dated I 2012 is still currently in use.</p>	<p>Complied</p>

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<p><b>6.2.2</b> A management official responsible for these issues shall be nominated.</p> <p><b>Minor Compliance</b></p>	<p>Interviews with the estate managers of Estate A, Estate C, Mill 1 and Mill 2 confirmed that they are the nominated persons responsible for communication and initial negotiations with the local communities, other interested and affected stakeholders. The interview also verified that their specific roles and responsibilities are clearly defined and understood.</p>	<p>Complied</p>
<p><b>6.2.3</b> A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained.</p> <p><b>Minor Compliance</b></p>	<p>The stakeholders list is updated as necessary and at least once a year. The updating of the list is effective and kept current as evidenced by the removal from the list - of the NGOs such as the snake management center (Hand for Help) and the Reproductive Health Awareness Cambodia (RHAC) as these 2 NGO projects had ended in this part of Cambodia.</p> <p>Records of stakeholders meeting with participation of affected parties and consideration of inputs such as a recent request for class room maintenance and building of teachers' quarters are maintained.</p>	<p>Complied</p>
<p><b>Criteria 6.3</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.</p>		
<p><b>Indicators</b></p>	<p><b>Findings and Objective Evidence</b></p>	<p><b>Compliance</b></p>
<p><b>6.3.1</b> The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested.</p> <p><b>Major Compliance</b></p>	<p>The PMU has an established and documented system for dealing with complaints and grievances. It is reported that there has been no disputes and whistle blowing incident for the year 2014 and 2015.</p>	<p>Complied</p>
<p><b>6.3.2</b> Documentation of both the process by which a dispute was resolved and the outcome shall be available.</p> <p><b>Major Compliance</b></p>	<p>Complaints received are in the form of matters pertaining to the housing quarters. Complaints such as for leaking sinks and blocked drainage s are managed by respective managers in charge and the maintenance unit. Records and photographs of maintenance are maintained.</p>	<p>Complied</p>
<p><b>Criteria 6.4</b> Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>		
<p><b>Indicators</b></p>	<p><b>Findings and Objective Evidence</b></p>	<p><b>Compliance</b></p>
<p><b>6.4.1</b> A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place.</p> <p><b>Major Compliance</b></p>	<p>The organization has a documented policy on compensation management PC-GA-024 as reported during the Main Assessment in 2012. The procedure provides the process for identifying legal and customary rights and for identifying people entitled to compensation.</p> <p>Review of relevant records verified that negotiation and compensation processes regarding land acquisition has been effectively and appropriately implemented as required. Sales and Purchase agreement is presently in progress for an acquisition of lands measuring 1050.71 hectare from villagers at Kampong Seila. Records such as land surveys, review of hard titles, identification and communications with owners are maintained in compliance to legal requirement.</p>	<p>Complied</p>
<p><b>6.4.2</b> A procedure for calculating and</p>	<p>There is a documented procedure for calculating and</p>	<p>Complied</p>

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<p>distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land.</p> <p><b>Minor Compliance</b></p>	<p>distributing compensation i.e. Land compensation and Negotiation procedure Flow chart, i.e. LC-NP-FC-002/14 dated 19 Jun 2014 signed by GM &amp; VP – Agriculture/Oil Palm is noted.</p> <p>Records show that compensation and land acquisition of land are found to have been done in legally acceptable manner. Ownership of land was properly established through land surveys and identification of hard titles. Compensation is done through established negotiation arrangement with owners. Minutes of meetings and photographs are maintained as evidence.</p> <p>There has been no dispute by any parties relating to legal, customary or user rights at the PMU.</p>	
<p><b>6.4.3</b> The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available.</p> <p><b>Major Compliance</b></p>	<p>The records of negotiation process and the outcome are documented in the minutes of meeting and evident in photographs.</p>	<p>Complied</p>
<p><b>Criteria 6.5</b> Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.</p>		
<p><b>Indicators</b></p>	<p><b>Findings and Objective Evidence</b></p>	<p><b>Compliance</b></p>
<p><b>6.5.1</b> Documentation of pay and conditions shall be available.</p> <p><b>Major Compliance</b></p>	<p>Pay and conditions are clearly documented in the Employment Contracts (in Khmer language) which was explained, understood and signed by the employees and the organization upon acceptance of work. . This applies to all workers i.e. basic, semi-skilled and skilled.</p> <p>Reviews of pay statements verified that the PMU has implemented the pay increment for the basic, semi-skill and skill workers from the beginning of this year. The increment in the wage rate is 6,200 Riels for the basic category, 4,200 Riels for the semi-skill and 4,200 Riels for the skill category.</p> <p>It is verified during assessment that the new wage rate for basic worker is 20,000 Riels. 20,000 x 26 days of work equals USD130 per month which is equivalent to the minimal wage of USD128 for garment factory workers. The poverty line for Cambodia is reported to be below USD120 per month.</p>	<p>Complied</p>
<p><b>6.5.2</b> Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p><b>Major Compliance</b></p>	<p>Review of the employment contracts revealed detailed conditions in Khmer language which include the following employment details:</p> <ul style="list-style-type: none"> <li>• job position</li> <li>• basic pay and overtime</li> <li>• working hours</li> <li>• work expectations</li> <li>• leave entitlement</li> <li>• housing</li> <li>• facilities entitlement</li> <li>• public holidays entitlement</li> <li>• termination terms</li> </ul> <p>Interviews with a harvester and two mill machine operators confirmed their knowledge of terms of wage</p>	<p>Complied</p>

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	payment and overtime payment. They confirm that no deductions are made and wages are received on time.	
<p><b>6.5.3</b> Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible (not applicable to smallholders).</p> <p><b>Minor Compliance</b></p>	<p>On-site assessment at the housing areas and interviews with workers, dependents and children confirmed that housing, water supplies, electricity supplies and dispensary facility provided are adequate according to local expectations and Cambodia Labour Law. They confirm that paramedical aid from the resident qualified nurses and ambulance service are readily available during office hours and any other time should there be emergencies. Interviews further verified their knowledge of emergency contact persons. Interviews with the Mill 2 dispensary nurse revealed that a child of a staff was transported to hospital by the dispensary ambulance the previous evening. Reviews of medical records revealed about 130 people seek medical attention per month and the diagnoses are mainly minor ailments such as cough and flu. Interview with a primary school director and a teacher reported that all his students come from the estates and mills.</p>	Complied
<p><b>6.5.4</b> Growers and millers shall make demonstrable efforts to monitor and where able, improve workers' access to adequate, sufficient and affordable food.</p> <p><b>Minor Compliance</b></p>	<p>Site assessments and interviews verified that workers could easily obtain their daily sundry supplies from stalls and mini-markets operated by workers' dependents in the housing sites or at the nearby villages. Interviews with some children at the housing reported that they had rice and duck eggs for breakfast in the morning. Some workers make weekly visit to the nearest town by own transport or private vans whenever necessary. Access to adequate, sufficient and affordable food is confirmed.</p>	Complied
<p><b>Criteria 6.6</b> The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
<p><b>6.6.1</b> A published statement in local languages recognising freedom of association shall be available.</p> <p><b>Major Compliance</b></p>	<p>The documented social policy that recognizes freedom of association in both English and Khmer languages as endorsed by the VP of Plantations in Apr 2012 is maintained. The organization acknowledges the freedom of association in the documented social policy which is displayed publicly at strategic locations of the Mill and Estate Offices.</p>	Complied
<p><b>6.6.2</b> Minutes of meetings with main trade unions or workers representatives shall be documented.</p> <p><b>Minor Compliance</b></p>	<p>Interviews with staff and workers confirmed there are no trade unions. Collective communications are held through their worker representatives called the Employee Delegates and gender representatives. Minutes of meetings are maintained. Records show that the employee delegate is registered with the governing authorities and they request collectively for permission to do overtime 2 hours per day monthly.</p>	Complied
<p><b>Criteria 6.7</b> Children are not employed or exploited.</p>		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>

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<p><b>6.7.1</b> There shall be documentary evidence that minimum age requirements are met.</p> <p><b>Major Compliance</b></p>	<p>The minimum employment age under the Cambodian law is 16 years old. The commitment to 'No child labor' is maintained in the Social policy which requires minimal employment age to be 18 years old.</p> <p>Reviews of employment contracts and employees' documents such as Cambodian Identification Cards and Birth Certificates confirmed consistent compliance to this policy.</p>	<p>Complied</p>
<p><b>Criteria 6.8</b> Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.</p>		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
<p><b>6.8.1</b> A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented.</p> <p><b>Major Compliance</b></p>	<p>The commitment to equal opportunities is evident in the publicly displayed Social policy in the mill and estate offices. The policy clearly states its prohibition of any discrimination based on race, religion, gender, disability, sexual orientation, age or political affiliation.</p>	<p>Complied</p>
<p><b>6.8.2</b> Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against.</p> <p><b>Major Compliance</b></p>	<p>Interviews with male and female supervisors and field conductors and verification with pay statements confirmed the implementation of equal pay for same job and no known practices of discrimination between man and woman workers. A female field conductor reported that she does not think her recent child birth (to a pair of twins) would bring about any form of discrimination in the future.</p>	<p>Complied</p>
<p><b>6.8.3</b> It shall be demonstrated that recruitment selection, hiring and promotion where relevant are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available.</p> <p><b>Minor Compliance</b></p>	<p>There is a documented SOP for the recruitment and hiring of staff and workers. Depending on the nature of work positions, the PMU management takes into considerations the needs for technical qualifications/experience and related skills in recruitment selection, hiring and promotion exercises.</p> <p>Reviews of records verified that the recruiting of tractor drivers was done in transparent and fair manners in April 2015. A total of 13 drivers were recruited from 45 applicants. They went through driving test and writing tests. The highest 13 scorers were selected.</p>	<p>Complied</p>
<p><b>Criteria 6.9</b> There is no harassment or abuse in the work place, and reproductive rights are protected.</p>		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
<p><b>6.9.1</b> A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce.</p> <p><b>Major Compliance</b></p>	<p>The policy to prevent sexual harassment and all forms of harassment is clearly stated in the documented Social policy.</p> <p>The commitment to provide a work environment that is free from any sexual harassment and violence against any of the workforce is verified in interviews with female field workers and workers at the main office who confirmed that they feel happy and comfortable working there.</p> <p>Interviews with the HR &amp; Gender Committee staff and workers revealed briefing on harassment issue, general understanding of sexual harassment in the workplace and the mechanism to report an alleged sexual harassment or violence. Attendance lists dated 29 April, 9 June, 18 June and 20 June verified that both male and female workers were given the necessary briefings.</p>	<p>Complied</p>



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<p><b>6.9.2</b> A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce.</p> <p><b>Major Compliance</b></p>	<p>The policy to protect the reproductive rights and rights to have a family of the workers especially women is evidently stated in the Social Policy.</p> <p>Interview with a female field conductor and review of her pay statements and that of another female conductor who is now on confinement leave verified that they are given the stated 90 days of 50% paid maternity leave and the fully paid food and gasoline allowance.</p>	<p>Complied</p>
<p><b>6.9.3</b> A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce.</p> <p><b>Minor Compliance</b></p>	<p>A specific grievance mechanism is established and documented in SOP GA-019. Communication and understanding of employees is verified with interviews with 2 operators/workers at the mill. The commitment to manage grievance among employees is evident in the records and photographs of "opening the complaint box" procedure by the assigned personnel for the 9 complaint boxes which are dated 27/2/15 and 25/6/15. There has been no grievance reported for 2014 and 2015.</p>	<p>Complied</p>
<p><b>Criteria 6.10</b> Growers and millers deal fairly and transparently with smallholders and other local businesses.</p>		
<p><b>Indicators</b></p>	<p><b>Findings and Objective Evidence</b></p>	<p><b>Compliance</b></p>
<p><b>6.10.1</b> Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available.</p> <p><b>Minor Compliance</b></p>	<p>It is verified that there are no purchases of FFB from any out growers or smallholders. Thus this is not applicable.</p>	<p>Not applicable</p>
<p><b>6.10.2</b> Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation).</p> <p><b>Major Compliance</b></p>	<p>As above.</p>	<p>Not applicable</p>
<p><b>6.10.3</b> Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.</p> <p><b>Minor Compliance</b></p>	<p>Interview with a road maintenance contractors verified that he understand the contractual agreements (such as terms and payment) which he entered into with the organization. The contracts are reported as legal, fair and transparent.</p>	<p>Complied</p>
<p><b>6.10.4</b> Agreed payments shall be made in a timely manner.</p> <p><b>Minor Compliance</b></p>	<p>Interviews with the contractors reported that payments are received in timely manner and they have not encountered any problems with payment so far.</p>	<p>Complied</p>
<p><b>Criteria 6.11</b> Growers and millers contribute to local sustainable development where appropriate.</p>		
<p><b>Indicators</b></p>	<p><b>Findings and Objective Evidence</b></p>	<p><b>Compliance</b></p>
<p><b>6.11.1</b> Contributions to local development that are based on the results of consultation with local communities shall be demonstrated.</p> <p><b>Minor Compliance</b></p>	<p>Contributions to local development are based on the results of consultation with local communities as documented in the updated SIA 2015.</p> <p>The following are the social and local development and contributions in brief :</p> <p>1) Provision of ambulance transport to the hospitals or clinics to the needy villagers. Two elderly and bed ridden villagers were sent to hospital for treatment this year.</p> <p>2) Contribution of a sum of 11 million riels for inauguration of a temple in March 2015</p>	<p>Complied</p>

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	<p>3) Road repair ( 2.6km long) in Tapoa Village</p> <p>4) 6 units of communication phones to the administration police office of Cheung Kou commune</p> <p>5) 1,800 USD support to the military office at Koh Kong</p> <p>6) Continued monthly financial assistance of USD 20 each to every teacher in 8 surrounding primary schools.</p> <p>7) Provision of work opportunities to the local communities. About 46% of staff and 88% of workers come from the neighboring villages.</p>	
<p><b>6.11.2</b> Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity.</p> <p><b>Minor Compliance</b></p>	<p>It was verified that there were no smallholder scheme programs at the PMU.</p>	<p>Not Applicable</p>
<p><b>Criteria 6.12</b> No forms of forced or trafficked labour are used.</p>		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
<p><b>6.12.1</b> There shall be evidence that no forms of forced or trafficked labour are used.</p> <p><b>Major Compliance</b></p>	<p>The employment contracts maintained at the estate offices confirmed that all workers were recruited in accordance with the legal requirements of Cambodia (Cambodian Labour Law 1997). The workers are mainly from the neighboring villages within the province of Sihanouk. Interviews with field workers confirmed that there were no forced or trafficked labour. Mill workers confirmed that they could opt not to do over-time work if so desired.</p>	<p>Complied</p>
<p><b>6.12.2</b> Where applicable, it shall be demonstrated that no contract substitution has occurred.</p> <p><b>Minor Compliance</b></p>	<p>There was no evidence of contract substitution and this was confirmed from interviews with workers.</p>	<p>Complied</p>
<p><b>6.12.3</b> Where temporary or foreign workers are employed, a special labour policy and procedures shall be established and implemented.</p> <p><b>Major Compliance</b></p>	<p>There is no requirement for any special labour policy as no foreign workers are employed.</p>	<p>Not applicable</p>
<p><b>Criteria 6.13</b> Growers and millers respect human rights.</p>		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
<p><b>6.13.1</b> A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1).</p> <p><b>Major Compliance</b></p>	<p>A documented policy stating human rights and ethical conduct and integrity has been developed this year and communicated to a total of 623 staff and workers from 25-29 June 2015 year. There is a plan to cover all employees within this year in stages.</p>	<p>Complied</p>
<p><b>6.13.2</b> As long as children of plantation workers are not secured a right to go to government school, the plantation companies should engage in a process to secure the children of the plantation workers access to education as a moral obligation.</p> <p><b>Minor Compliance</b></p>	<p>There are no foreign workers and families in the estates and the mill. All local children are eligible to be enrolled in the local government schools. Interviews and records show that school-going children (6 years and above) of staff and workers are all enrolled in the 8 government schools which are nearest to their homes. An interview with a primary school head confirmed that all his students come from the estates and mills.</p>	<p>Complied</p>

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### Principle 7: Responsible development of new plantings

<b>Criteria 7.1</b> A comprehensive and participatory independent social and environmental impact assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations.		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
<b>7.1.1</b> An independent social and environmental impact assessment (SEIA), undertaken through a participatory methodology including the relevant affected stakeholders, shall be documented.  <b>Major Compliance</b>	SEIA assessment had been conducted by Green Consultant Group Ltd. for developing 2432.42 ha which cover the 2014 and 2015 New Plantings. SEIA included previous land use/history and involved independent consultation as per national and state regulations, via participatory methodology which included external stakeholders.	Complied
<b>7.1.2</b> Appropriate management planning and operational procedures shall be developed and implemented to avoid or mitigate identified potential negative impacts.  <b>Minor Compliance</b>	The management plan and operational procedures had been developed, implemented, monitored and reviewed as per the results of SEIA.	Complied
<b>7.1.3</b> Where the development includes an outgrower scheme, the impacts of the scheme and the implications of the way it is managed shall be given particular attention.  <b>Minor Compliance</b>	The oil palm lands are developed by the Plantation Company and there is no smallholder scheme.	Not Applicable
<b>Criteria 7.2</b> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
<b>7.2.1</b> Soil suitability maps or soil surveys adequate to establish the long-term suitability of land for oil palm cultivation shall be available and taken into account in plans and operations.  <b>Major Compliance</b>	Area suitable for oil palm planting had been established by soil survey team of the Agricultural Technical Service Provider of Department of Agriculture, Phnom Penh from Jan - Apr 2013.	Complied
<b>7.2.2</b> Topographic information adequate to guide the planning of drainage and irrigation systems, roads and other infrastructure shall be available and taken into account in plans and operations.  <b>Minor Compliance</b>	There was adequate information in the topographic map for planning drainage and irrigation systems, roads, and other infrastructure.	Complied
<b>Criteria 7.3</b> New plantings since Nov 2005 have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
<b>7.3.1</b> There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since Nov 2005. New plantings shall be planned and managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2).  <b>Major Compliance</b>	HCV assessment, including stakeholder consultation, had been conducted prior to the extended development in 2012 by Envirologic Sdn Bhd. A further SEIA assessment was carried out by Green Consulting Group Co. Ltd. in 2014 for extended lands at Estate B and C prior new planting. The new extended land areas were agricultural produce lands which were occupied by villagers for subsistence farming since 1997 and there were no reported HCVs in the report. This was verified during on site assessment.	Complied



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<p><b>7.3.2</b> A comprehensive HCV assessment, including stakeholder consultation, shall be conducted prior to any conversion or new planting. This shall include a land use change analysis to determine changes to the vegetation since Nov 2005. This analysis shall be used, with proxies, to indicate changes to HCV status.</p> <p><b>Major Compliance</b></p>	<p>The extended development land at Estate B and C were plots of formerly agricultural crop land owned and used by villager for subsistence farming. There were no Environmentally Sensitive Areas (ESAs) or HCVs at the extended land which was verified during on site. The lands were agricultural produce lands which is also suitable for oil palm planting.</p>	<p>Complied</p>
<p><b>7.3.3</b> Dates of land preparation and commencement shall be recorded.</p> <p><b>Minor Compliance</b></p>	<p>Records on dates of land preparation and commencement had been verified.</p>	<p>Complied</p>
<p><b>7.3.4</b> An action plan shall be developed that describes operational actions consequent to the findings of the HCV assessment, and that references the grower's relevant operational procedures (see Criterion 5.2).</p> <p><b>Major Compliance</b></p>	<p>Verified that there were no HCV areas found in the new planting areas. Thus such action plan was not needed.</p>	<p>Complied</p>
<p><b>7.3.5</b> Areas required by affected communities to meet their basic needs, taking into account potential positive and negative changes in livelihood resulting from proposed operations, shall be identified in consultation with the communities and incorporated into HCV assessments and management plans (see Criterion 5.2).</p> <p><b>Minor Compliance</b></p>	<p>Details of areas required by affected communities to meet their basic needs had been documented in the SEIA report in 2014 by Green Consulting Group Ltd. These areas were not encroached by the PMU during the extended new planting in 2014 &amp; 2015.</p>	<p>Complied</p>
<p><b>Criteria 7.4</b> Extensive planting on steep terrain, and/or marginal and fragile soils, including peat, is avoided.</p>		
<p><b>Indicators</b></p>	<p><b>Findings and Objective Evidence</b></p>	<p><b>Compliance</b></p>
<p><b>7.4.1</b> Maps identifying marginal and fragile soils, including excessive gradients and peat soils, shall be available and used to identify areas to be avoided. All new plantings should not be cultivated on land more than 300m above sea level unless specified by local legislation.</p> <p><b>Minor Compliance</b></p>	<p>The area is flat to rolling. No steep land involved and the altitude ranges from 10 metres to 127 metres above sea level as described in the soil survey carried out by Technical Agricultural service of Department of Agriculture, Cambodia.</p>	<p>Complied</p>
<p><b>7.4.2</b> Where limited planting on fragile and marginal soils, including peat, is proposed, plans shall be developed and implemented to protect them without incurring adverse impacts.</p> <p><b>Major Compliance</b></p>	<p>Majority of the area consist of sandy loam. Annual leaf sampling and analysis is required for fertilizer recommendations to maintain sustainable yield of the palms.</p>	<p>Complied</p>
<p><b>Criteria 7.5</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their free, prior and informed consent. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>		
<p><b>Indicators</b></p>	<p><b>Findings and Objective Evidence</b></p>	<p><b>Compliance</b></p>
<p><b>7.5.1</b> Evidence shall be available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during</p>	<p>Stakeholder consultations were included as reported in the SEIA assessment report of 2014 by Green Consultancy. The annual SEIA review was done in April 2015 and noted during current surveillance that there were no issues on this matter.</p>	<p>Complied</p>

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<p>negotiations, and up until an agreement with the grower/miller is signed by these local peoples.</p> <p><b>Major Compliance</b></p>		
<p><b>Criteria 7.6</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.</p>		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
<p><b>7.6.1</b> Documented identification and assessment of demonstrable legal, customary and user rights shall be available.</p> <p><b>Major Compliance</b></p>	Compensation to local people had been negotiated and payment effected.	Complied
<p><b>7.6.2</b> A system for identifying people entitled to compensation shall be in place.</p> <p><b>Major Compliance</b></p>	A system for identifying people entitled to compensation had been established and implemented.	Complied
<p><b>7.6.3</b> A system for calculating and distributing fair compensation (monetary or otherwise) shall be in place.</p> <p><b>Major Compliance</b></p>	Complied, a system for calculating and distributing fair compensation had been established.	Complied
<p><b>7.6.4</b> Communities that have lost access and rights to land for plantation expansion shall be given opportunities to benefit from plantation development.</p> <p><b>Minor Compliance</b></p>	A system for calculating and distributing fair compensation had been established. Villagers were offered work on the estate the moment development commenced.	Complied
<p><b>7.6.5</b> The process and outcome of any compensation claims shall be documented and made publicly available.</p> <p><b>Minor Compliance</b></p>	Documents had been maintained for the process and outcome of the compensation claims which had been made publicly available.	Complied
<p><b>7.6.6.</b> Evidence shall be available that the company has made adequate efforts to enable affected communities and rights holders to have 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.</p> <p><b>Minor Compliance</b></p>	Communities had been offered to work on the plantation with accommodation provided.	Complied
<p><b>Criteria 7.7</b> No use of fire in the preparation of new plantings other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.</p>		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
<p><b>7.7.1</b> There shall be no land preparation by burning, other than in specific situations, as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.</p> <p><b>Major Compliance</b></p>	There was no evidence of clearing by burning being observed during the visit.	Complied
<p><b>7.7.2</b> In exceptional cases where fire has to be used for preparing land for planting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the</p>	No controlled burning had been carried out.	Complied



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<i>Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.</i>		
<b>Minor Compliance</b>		
<b>Criteria 7.8</b> New plantation developments are designed to minimise net greenhouse gas emissions.		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
<b>7.8.1:</b> The carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development shall be identified and estimated.	There was no high carbon stock in the area based on the SEIA report by Green Consulting Group.	Not applicable
<b>Major Compliance</b>		
<b>7.8.2:</b> There shall be a plan to minimise net GHG emissions which takes into account avoidance of land areas with high carbon stocks and/or sequestration options.	It is verified that the current extended new planting areas visited on-site are not high carbon stock areas.	Not applicable
<b>Minor Compliance</b>		

**Principle 8: Commitment to continual improvement in key areas of activity**

<b>Criteria 8.1</b> Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>

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<p><b>8.1.1</b> The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>• Reduction in use of pesticides(Criterion 4.6);</li> <li>• Environmental impacts (Criteria 4.3, 5.1 and 5.2);</li> <li>• Waste reduction (Criterion 5.3);</li> <li>• Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);</li> <li>• Social impacts (Criterion 6.1);</li> <li>• Encourage optimising the yield of the supply base.</li> </ul> <p><b>Major Compliance</b></p>	<p>Continuous Improvement Plans established, implemented and monitored for both the POM and Estates. These action plans include the following:</p> <ul style="list-style-type: none"> <li>- Reduction in amount of pesticides used (usage of paraquat had been discontinued in Feb 2012)</li> <li>- Increased in planted hectarage of beneficial plants (<i>Cassia cobanensis</i>, <i>Antigonon leptopus</i>).</li> <li>- Planting of legume cover crops (<i>Pueraria javanica</i> and <i>Calapogonium mucunoides</i>) in the new planting areas.</li> <li>- Planting some <i>Macuna bracteata</i> to gauge the success of this cover crop in this region.</li> <li>- Estate A will increase the number of beneficial plants from 5,700 in 2014 to 11,950 plants by end 2015.</li> <li>- Estate C will increase the number of beneficial plants from 11,500 in 2014 to 25,834 plants by end 2015.</li> <li>- Estate A will construct additional 14.65 KM of collection roads in 2015. These had been completed by the end of May, 2015 and 122 sets of new culvert had been constructed.</li> <li>- Estate C will construct additional 283 KM of collection roads and construct 1344 sets of new culvert, these were in progress.</li> <li>- At POM, additional anaerobic ponds are being constructed as part of improvement on POME control.</li> <li>- 100% field application of dried POME on estates.</li> <li>- EFB mulching applied at the fields including new planting areas.</li> <li>- Monitoring continued at environmental conservation areas and buffer zones.</li> <li>- Ongoing implementation of pollution mitigation and monitoring of stack emission at POM and improvement in boiler efficiency.</li> <li>- Continued infrastructure development, i.e. road construction (Chung Rang &amp; Sway Villages).</li> <li>- Construction of a new water treatment plant at the new mill.</li> <li>- Construction of reservoir at new mill to cater water supply during dry season.</li> <li>- Completion of remaining new housing quarters for workers at the 3 estates.</li> </ul>	<p>Complied</p>
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### 3.1.1 Supply Chain Certification Standards Findings - on CPO Mill

The POM has established and maintained procedures for the book keeping and monitoring requirements for the FFB and CPO at the mill. This assessment verified the implementation of documented procedures, verification of processing and traceability of FFB into CPO and PK, and availability of records to demonstrate compliance against all the elements of the Identity Preserved (IP) Module in accordance with the RSPO SCCS (Nov 2014) requirements.

#### Module D – CPO Mills: Identity Preserved (IP).

**Details of findings are as follows:**

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D.1 Definition		
Indicators	Findings and Objective Evidence	Compliance
<p>D.1.1</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from its own supply base certified to the RSPO Principles and Criteria (RSPO P&amp;C). Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. If a mill processes certified and uncertified FFB without physically separating the material then only Module E is applicable.</p>	<p>Both the CPO mills under the MRICOP grouping i.e. Monorum POM and Anlong Krapeu POM are verified to only process FFB from their common supply base i.e. the 3 estates A, B and C (see <b>Section 1.3</b>).</p> <p>It was verified that there was no sources of FFB from any outgrowers or independent suppliers / smallholders.</p> <p>Therefore both the CPO Mills under the MRICOP grouping are deemed to have 'Identity Preserved (IP)' status.</p>	<p>Complied</p>
D.2 Explanation		
Indicators	Findings and Objective Evidence	Compliance
<p>D.2.1</p> <p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&amp;C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnages of CPO and PK products that could potentially be produced by the POMs are monitored by the Mills respectively i.e. Monorum (Mill 1) &amp; Anlong Krapeu (Mill 2). The figures are checked and verified for accuracy.</p> <p>This figures provided represented the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced has been recorded in each subsequent annual surveillance report (see <b>Section 1.8.3 Tables 7A &amp; 7B</b>).</p>	<p>Complied</p>
<p>D.2.2</p> <p>The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>	<p>The POMs were verified to have met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>	<p>Complied</p>
D.3 Documented procedures		
<p>D.3.1</p> <p>The site shall have written procedures and/or work instructions to ensure the</p>	<p>Documented procedure for IP Module is: RSPO/SOP/COC/2 Issue No. 2 (01 Apr 2014).</p> <p>The procedure covered the implementation of all elements of IP</p>	<p>Complied</p>

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implementation of all the elements specified in these requirements. This shall include at minimum the following:	Module.	
a) Complete and up to date procedures covering the implementation of all the elements in these requirements	The documented procedure and its implementation was confirmed to have complied with all the specified requirements of Identity Preserved (IP) Module D that include controlling the FFB receipt, processing, sales, CPO and PK dispatch, and records keeping.	Complied
b) The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard.	<p>The respective Mill managers' i.e. Mr. Vong Pharith (Monorum mill) and Mr Wittayakorn Boonporn (Anlong Kropeu mill) has the overall responsibility and authority for implementation and compliance with the documented procedure.</p> <p>Both Managers and their supporting staff under their charge have been able to demonstrate satisfactory levels of competence, skill and knowledge of the RSPO Supply Chain Certification Standard Module D requirements and its implementation.</p> <p>Interview of the Assistant Mill Managers, Ms. Payong, Mr Doung So and other relevant staff were found to be their knowledge of the RSPO Supply Chain Certification requirements for the respective areas of operations. Organization Chart and job descriptions documented.</p> <p>Training on the RSPO SCCS (Nov 2014) conducted on 3 Jun 2015 was verified and record of the training was maintained.</p>	Complied
D.3.2 The facility shall have documented procedures for receiving and processing certified and non-certified FFBs.	<p>For the period FY 2014/2015, the POMs received and processed FFB from the 3 estates only.</p> <p>The PMU did not receive any non-certified FFB from other sources or suppliers.</p> <p>All FFB supplied and received at the Mills were verified to have traceable documents at the weighbridge personnel.</p>	Complied
<b>D.4 Purchasing and goods in</b>		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
D.4.1 The facility shall verify and document the tonnages and sources of certified and non-certified FFBs received.	The Mills had respectively maintained records of tonnages and supply source of FFB from the respective estates at the weighbridge stations, in the delivery chits and weighbridge tickets on a daily basis. On a monthly basis these figures are reported to the MRT-TCC (JV) Head Office at Phnom Penh. It is verified that there were no non-certified FFBs.	Complied
D.4.2 The facility shall inform the CB immediately if there is a projected overproduction of certified tonnage.	Both mills monitor all FFB received, CPO and PK production. The site HQ and POMs has an internal monitoring and reporting mechanism for informing the CB in the event of any projected overproduction. Todate there has been no projected overproduction.	Complied
<b>D.5 Record keeping</b>		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
D.5.1 The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on	<p>The records and reports are available from the computerized system. Also, hard copies of records and reports are properly filed and readily accessible.</p> <p>Inspection of records and reports at the Mills confirmed that these</p>	Complied



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a three-monthly basis.	<p>were accurate, complete and updated daily. As per the SOP, the records and reports are archived and stored in the respective Mill Offices for a minimum period of 5 years.</p> <p>The weighbridge tickets for delivery of CPO and PK indicated the products as certified IP Module for the Monorum mill (Mill 1- old mill) which is similarly adopted by the Anlong Kropeu mill (Mill 2- new mill).</p> <p>Transaction documents and bookkeeping of FFB, CPO and PK are done daily and monthly summary submitted to Head Office. A tonnage balance recording system that shows FFB deliveries, CPO and PK production and dispatch is balanced every 3 months.</p>	
<b>D.6 Processing</b>		
<b>Indicators</b>	<b>Findings and Objective Evidence</b>	<b>Compliance</b>
D.6.1 The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept segregated from non-certified material including during transport and storage.	Confirmed from records that the Mills only received and processed certified FFB from its own estates. The processing facility has established and implemented a clear procedure and mechanism for the IP module. Review and on-site verification confirmed that the mechanism was implemented and in compliance with the module requirements at the both the mills including transport and storage.	Complied
D.6.2 The objective is for 100 % segregated material to be reached.	Documents and records provided documented evidence for the FFB receipt and processed, CPO and PK produced to be traceable to certified material. Product type and supply chain module indicated as CSPO/IP the quantities sold under CSPO contracts. At the time of assessment, it is noted that there has been no contract for CSPK yet.	Complied

### 3.1.2 Status on Supply Chain on POM:

Based on the documents and records presented during the on-site verifications made, it is concluded that the **MRICOP Grouping Mills i.e. Monorum Mill (No.1) and Anlong Kropeu Mill (No.2)** has been able to comply with the requirements of the RSPO SCCS under the 'IP' module and is thus eligible for 'IP' trading for its palm products for year 2015/2016.

### 3.1.3 Monitoring of CSPO and CSPK traded:

The trading of the CSPO via RSPO eTrace was monitored by the MRICOP Grouping. Presently, CSPO trading is for certified products at the Monorum POM only. The records maintained relied on internal communications of the trading done by the MRT-TCC HQ on the CSPO delivered to a European destination. The volumes of CSPO traded as verified during assessment are as follows:

	<b>CSPO - Actual Jul 2013 – Jun 2014 (MT)</b>	<b>CSPK - Actual Jul 2013 – Jun 2014 (MT)</b>	<b>CSPO - Actual Jul 2014 – Jun 2015 (MT)</b>	<b>CSPK - Actual Jul 2014 – Jun 2015 (MT)</b>
RSPO	4,719.80	0	5,583.59	0
ISCC	-	-	-	-
Total Traded	4,719.80	0	5,583.59	0
Actual Produced	23,054.11	4,569.64	23,127.96	5,009.43

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Notes:

- Based on records maintained at the Monorum POM, it was verified that the total volume of CSPO traded has not exceeded the annual certified quantity.
- All PK are exported out without claim as 'CSPK' to overseas buyers.
- There has been no trade of any CSPO or CSPK via 'Book & Claim' (GreenPalm).

### 3.2 Status of Identified Noncompliance and Corrective Actions, Observations and Positive Elements.

**3.2.1** The status of the Noncompliances (NCR) and Observations (OBS) identified against the RSPO P&C and Cambodian Local Indicators is as per the details below:

Assessment Type	Year	Noncompliance (NCR)	Observations (OBS)	Follow up status
Initial / Main Assessment	2012	4 Minor	5	Actions taken on the NCRs and OBS verified to be effective during ASA-01.
Annual Surveillance Assessment (ASA-01)	2013	2 Major & 2 Minor	0	Actions taken on the NCRs verified to be effective during ASA-02.
Annual Surveillance Assessment (ASA-02) cum Extension of scope	2014	1 Major & 0 Minor	6	Actions taken on the NCRs and OBS verified to be effective during ASA-03.
Annual Surveillance Assessment (ASA-03) cum Extension of scope	2015	2 Major & 2 Minor	1	Next assessment (ASA-04)

#### Year 2014: ASA-02 (1 NCR)

NCR	CLI Indicator	Details of NCR
Major NC# CFK-01	4.7.4	Date issued: 11 Jul 2014
		<p>Nonconformance:</p> <p>The Palm Oil Mill and Estate C had only conducted one (1) meeting between the responsible persons and the workers to discuss on health, safety and welfare during the last 12 months. This was contrary to the requirement to hold regular meetings (quarterly meetings to be conducted as specified in the Safety and Health Plan dated 17/06/2014) and as specified in the RSPO indicator.</p>

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		<p>Root Cause and Corrective Action:</p> <p>The requirement to conduct regular meetings was not adhered to.</p> <p>Only one meeting was conducted in early June this year. However, July onwards, the OSH one year action plan has been re-developed and the following actions have been taken:</p> <p>(a) The OSH activities at the Estate A, B and C and the MRICOP palm oil mill are overseen by the main OSHE (Occupational Safety, Health and Environment) committees for plantation, chaired by the General Manager Plantations and for CPO Mill. chaired by Mill Manager, and OSH/ESG subcommittees. The main OSHE Committees shall meet every 6 months.</p> <p>The OSH/ESG subcommittee is chaired by the respective Estate Manager and Mill Manager, which is represented by the respective Heads of Divisions, conductors and key staff.</p> <p>(b) The OSH/ESG subcommittee meeting is scheduled to be held every three (03) months at Estates A, B, C and the palm oil mill respectively and workers/worker representatives will be invited to attend every sub-committee meeting. The minutes of each meeting will be compiled. <u>The minutes of the meeting held on Estate C and the MRICOP palm oil mill from 16<sup>th</sup> – 17<sup>th</sup> July 2014 are attached herewith.</u></p> <p>(c) The OSH Plan (One Year Action Plan July 2014 -June 2015) has been reviewed and re-drawn to show the OSH activities including meetings and the activities planned for the information of all staff and workers concerned. <u>The one year action plan that has been drawn up is attached herewith.</u></p> <p>(d) In addition to the general daily muster meetings now held every morning prior to commencement of daily work 1shift, it is planned to hold a muster meeting every 3 monthly once at each division in which the aspects of Safety &amp; Health are emphasized. These meetings will be conducted by the Estate Manager or respective Head of Division. Documented evidence of each of these meetings (attendance list. photos etc.) will be kept as records.</p>		
		<p>Verification for Closure:</p> <p>Off-site Verification conducted on: 24 Jul 2014 (CFK).</p> <p>Root cause identified and Corrective Action implemented. Evidence submitted and verified to be satisfactory include minutes of the OSH/ESG meetings held on 16-17 Jul 2014 and the OSH Plan (One Year Action Plan Jul 2014 - Jun 2015).</p>		
		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;"><b>NC status verified by auditor: CFK</b></td> <td style="width: 40%;"><b>Date closed: 9 July 2015</b></td> </tr> </table>	<b>NC status verified by auditor: CFK</b>	<b>Date closed: 9 July 2015</b>
<b>NC status verified by auditor: CFK</b>	<b>Date closed: 9 July 2015</b>			
		Verification (for effectiveness): Implementation was found to be effectively maintained.		

### Year 2014: ASA-02 (6 Observations)

Ref No:	Cambodian Local Indicator	Location	Details of Observation	Status		
				Opened date	Closed date	Follow up remarks (if any)
OCL-01	Human Rights Policy 1.2.1 (also Criterion 6.13)	Palm Oil Mill and Estate B & C	The Human Rights Policy has not yet been documented and communicated to all levels of the workforce and operations.	10 Jul 2014	9 July 2015	Verified during surveillance assessment that action taken.
OCL-02	Code of Ethical	Palm Oil	Policy of Commitment to a	10 Jul	9 July	Verified during

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	Conduct and Integrity 1.3.1	Mill and Estate B & C	Code of Ethical Conduct and Integrity in all operations and transactions has not yet been documented and communicated to all levels of the workforce and operations.	2014	2015	surveillance assessment that action taken.
<b>CFK-01</b>	4.6.11 (Medical Surveillance)	Estate C	The POM and Estate B had sent the workers handling chemicals for annual medical surveillance. However, Estate C last sent the chemical sprayers for medical surveillance on 16 May 2013 but the Management had yet to send the workers for medical surveillance as at the time of assessment on 9 Jul 2014. It was noted that the medical surveillance for Estate C chemical sprayers are scheduled to be sent in Jul 2014.	9 Jul 2014	9 July 2015	Verified during surveillance assessment that action taken.
<b>CFK-02</b>	4.8.2 (Training records of field workers)	POM, Estate B Estate C	The management units had only completed the maintenance of records of training for the staff members, and those for the workers were in the process of being prepared.	11 Jul 2014	9 July 2015	Verified during surveillance assessment that action taken.
<b>AL-01</b>	5.1.3 (Stack emissions and Landfill areas)	MRICOP -POM, Estates B & C	<p>1. At POM: Monitoring of stack emission is still ongoing including repair and upgrade required as recommended by the recently appointed contractor in Apr 2014. Observation is issued for follow up needed to ensure emission levels are brought to consistent acceptable / recommended levels applicable to Cambodia.</p> <p>2. At Estates B and C: Designated landfill signages should be improved and proper fencing done and locations for future should be planned a few years ahead and consider minimum distance from water sources and village/ housing areas.</p>	10 Jul 2014	9 July 2015	<p>1. Verified during surveillance assessment that action taken.</p> <p><b>2. Action taken was not effective. Refer to Minor NC# SH-02 issued in ASA-03</b></p>
<b>AL-02</b>	5.6.3 (New requirement on GHG emissions)	MRICOP POM & PMU estates	PMU has just commenced to identify and compile the data for GHG emissions. Plans to further reduce or minimise GHG emissions are yet to be established and implemented. Thus, the plans to be established will need to be followed up.	10 Jul 2014	-	<b>Action taken was not effective. Refer to Minor NC# AL-01 issued in ASA-03</b>

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Year 2015: Surveillance Assessment ASA-03 (4 NCRs)

NCR	CLI Indicator	Details of NCR
Major NCR# CFK-01	4.7.2	<b>Date issued: 9 July 2015</b>
		<b>Nonconformance:</b> In Field J20 and Field N20 on Estate C, the harvesters did not wear safety helmet although they had been provided with it. On 7-7-2015, while travelling along the government road next to Estate B from Sihanouk Veil to Estate C office, it was noted that a group of harvesters were harvesting the tall palms with sickle, and they were not wearing safety helmet. On 8-7-2015, in Field F6 and Field H4 on Estate A, where activities such as FFB harvesting, slashing of woody plants, and road side pruning of fronds were in progress, most of the workers were not wearing protective hand gloves. Estate A Management did not provide safety helmet to visitors visiting the field where safety helmet would be needed e.g. tall palm harvesting area, as a safety precautionary measure.
		<b>Root Cause and Corrective Action:</b>  We accept that the practice of wearing safety helmets is a must especially during harvesting and pruning activities. Our Risk Assessment does indicate that there are hazards in these jobs and safety helmet is an important PPE that must be worn during work. Based on your finding and recommendation, we will ensure that all workers carrying out harvesting, pruning and manual slashing work are provided with safety helmets and protective hand gloves. The above has already been implemented. Although safety training has been carried out regularly for harvesters the awareness seems to be lacking and the management will ensure that this is addressed promptly through more training and supervision.  The estate sub-committee on OSH and the main committee chaired by the General Manager has taken cognizance of the short coming and has implemented corrective measures. The estate management has taken immediate corrective action by conducting special training on the use and advantage of wearing PPE when performing the work at the field, essentially, wearing safety helmet and/or glove for harvesting, pruning and manual slashing by all concerned harvesters and workers at the Estates A, B and C respectively. The documented evidence that related training has been conducted at respective locations for the workers concerned is enclosed herewith.  The management will also ensure that when the visitors who come to visit the workplace such as visit the activities inside the mills or plantation, will be provided with the safety helmet. This will be implemented immediately.
		<b>Verification for Closure:</b> Off-site verification was carried out. Verified that the Corrective Actions taken were adequate and is supported by evidences such as records, photographs, briefings and training records, as submitted on 28 July 2015 is acceptable.
		<table border="1" style="width: 100%;"> <tr> <td style="width: 60%;"><b>NC status verified by auditor: Closed by CFK</b></td> <td style="width: 40%;"><b>Date closed: 30 July 2015</b></td> </tr> </table>
<b>NC status verified by auditor: Closed by CFK</b>	<b>Date closed: 30 July 2015</b>	
		Verification (for effectiveness): At next assessment

NCR	Indicator	Details of NCR
Major NCR# SH-01	5.2.2	<b>Date issued: 9 July 2015</b>
		<b>Nonconformance:</b> a) <b>Buffer zones and markers at the following locations are not adequately mapped out and demarcated:</b> i) Conservation area i.e. small Hill (Estate C) ii) Water Reservoirs (Estate C) iii) New Effluent ponds (Estate C)  b) <b>Signages sharing boundary near Community Forest areas are not sufficient constructed and clearly placed.</b>



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		<p><b>Root Cause and Corrective Action:</b></p> <p>The points raised have been noted and immediate action has been taken to rectify the situation.</p> <p>The following corrective actions have been taken to address the issues raised:</p> <ul style="list-style-type: none"> <li>- The two small hills at the Estate C, that has been left unplanted, will be marked as conservation areas on the map; while on the ground, a big signage marked "conservation area" will be prominently placed to inform all stakeholders especially the public that the area is protected and the trees are not to be felled and no burning. In addition, distinct boundary markers painted with the standardized colors of red and white will be placed around the hills. The Management also plans to conduct awareness training to the plantation workers the majority of whom are coming from the surrounding villages on the meaning, concept and preservation of the conservation area and they in turn can spread the message to the village community.</li> </ul> <p>With regards to the water reservoirs and new effluent ponds at Estate C, as above the estate management will install signage "Conservation area" and shall place buffer markers painted with red and white paint around these sites.</p> <p>Proper signage and painted markers will be installed to clearly identify the boundary with the Community Forest area. In addition, the Management has agreed and informed the Head of the Community Forest that it will sponsor the signage for the Conservation Area and its erection at site</p> <p>The documented photographic evidence to indicate that the corrective actions have been taken is attached herewith.</p>		
		<p><b>Verification for Closure:</b></p> <p>Off-site verification was carried out.</p> <p>Verified that the Corrective Actions taken were adequate and is supported by evidences such as records, photographs, briefings and training records, as submitted on 28 July 2015 which is acceptable.</p>		
		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;"><b>NC status verified by auditor: Closed by SH</b></td> <td style="width: 40%;"><b>Date closed: 30 July 2015</b></td> </tr> </table>	<b>NC status verified by auditor: Closed by SH</b>	<b>Date closed: 30 July 2015</b>
<b>NC status verified by auditor: Closed by SH</b>	<b>Date closed: 30 July 2015</b>			
		Verification (for effectiveness): At next assessment		

NCR	Indicator	Details of NCR		
<b>Minor NC# SH-02</b>	<b>5.3.3</b>	<b>Date issued: 9 July 2015</b>		
		<b>Nonconformance:</b>		
		<b>Landfills for domestic waste disposal are not adequately managed i.e. location is not proper with inadequate signages and littering at i) Estate A (Division A1) and ii) near Monorum Mill (Mill 1).</b>		
		<p><b>Root Cause and Corrective Action:</b></p> <p>The management of Estate A and Monorum Mill has taken immediate action on the improper location of existing landfills by relocating them to the proper location along with the placement of signage at site. Awareness training was conducted for respective workers on proper techniques of disposal for domestic waste. In addition a definite plan will be drawn up on future expansion of the land fill sites to replace the old ones that are progressively filled.</p> <p>Please find enclosed the documented evidence to indicate that the corrective action for this non conformance raised in the report has been addressed.</p>		
		<p><b>Verification for Closure:</b></p> <p>Off-site verification was carried out.</p> <p>Verified that the Corrective Actions taken were adequate and is supported by evidences such as records, photographs, briefings and training records, as submitted on 28 July 2015 is acceptable.</p>		
		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;"><b>NC status verified by auditor: Closed by SH</b></td> <td style="width: 40%;"><b>Date closed: 30 July 2015</b></td> </tr> </table>	<b>NC status verified by auditor: Closed by SH</b>	<b>Date closed: 30 July 2015</b>
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		Verification (for effectiveness): At next assessment		



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NCR	Indicator	Details of NCR	
<b>Minor NC# AL-01</b>	<b>5.6.3</b>	<b>Date issued: 9 July 2015</b>	
		<b>Nonconformance:</b>  <b>Greenhouse gas (GHG) calculations using RSPO PalmGHG is not the latest version to be used i.e. version 2.1.1 and the data has not yet been submitted to RSPO for review and endorsement by RSPO prior to the audit.</b>	
		<b>Root Cause and Corrective Action:</b>  The new version of the RSPO Palm GHG Calculator Ver 2.1.1 has been downloaded. Based on data collated from the 3 estates and the palm oil mill for Year 2014 the GHG emission value for MRICOP mill has been worked out. The Report will be sent to the RSPO secretariat for endorsement and a copy to the CB enclosed herewith as evidence.	
		<b>Verification for Closure:</b> Off-site verification was carried out. Verified that the Corrective Actions taken were adequate and is supported by evidence of submission and the response made from the RSPO Secretariat on 28 July 2015.	
		<b>NC status verified by auditor: Closed by AL</b>	<b>Date closed: 30 July 2015</b>
		Verification (for effectiveness): At next assessment	

### Year 2015: ASA-03 (1 Observation)

Ref No:	Cambodian Local Indicator	Location	Details of Observation	Status		
				Opened date	Closed date	Follow up remarks (if any)
<b>OBS# CFK-01</b>	4.7.5 (First Aid Kits)	Palm Oil Mill and Estate A & C	First Aid Kits were available at the Mills and estates. It is noted that several items were used but regular checking not recorded. Also there was no list of items for checking and topping up of the medicines in the kits.	9 July 2015	-	Next assessment (ASA-04)

Note: The progress made on the observations listed will be reviewed during the subsequent surveillance assessment on the action and implementations taken.

### 3.2.2 Identified Positive Elements

1. Social and community support provided in the clinics, schools and worship temples within the vicinity of the estates.
2. Long term employment and steady income for the local community and nearby villagers.
3. Overall contribution to the economic and social development of the people of Cambodia.

### 3.3 Summary of Feedback Received from Stakeholders and Findings

Prior to and during the Assessment, written and verbal feedback communicated from the stakeholders on the environmental and social performance of the PMU operations were sourced. All pertinent feedback issues were reviewed and followed up for verification and these had been accordingly incorporated into the report findings. See table below:

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### Year 2015: ASA-03

Communication done via email on 3 June 2015 to various categories of stakeholders (see list under para 2.5):

Stakeholders' Feedback	PMU Response	CB verification / comments	Follow up comments (if any)
<b>Government Agencies:</b> No feedback received.	No response needed	Verified no response needed	Nil
<b>Non-Governmental Organizations:</b> No feedback received.	No response needed	Verified no response needed	Nil
<b>Local Communities:</b> During the assessment from 6-9 Jul 2015, on-site interviews and stakeholders consultations with internal stakeholders such as staff and workers and external stakeholders including villagers, village heads, contractors, school teachers, military and police personnels was conducted.  Positive comments include: <ul style="list-style-type: none"> <li>• Landfilling at the foundation site for the building of the Veal Meas Pagoda</li> <li>• Provide ambulance transport to needy villagers</li> <li>• Maintenance of village roads on request</li> <li>• Maintenance of school classes and compound on request.</li> <li>• Allow cattle farmers free access into the estates for cattle grazing.</li> <li>• Stakeholders generally confirm that the PMU provide work opportunities to villagers thereby lifting some of them out of unemployment and poverty.</li> </ul> There are no negative comments from the Stakeholders Consultation.	The PMU will continue to contribute to the development of the villages and local communities and provide assistance to the needy whenever possible.	To be followed up during the next Annual Surveillance Assessment.	
<b>Other Interested parties:</b> Nil	Nil	Nil	Nil

### Year 2014: ASA-02

Communication done via email on 30 May 2014 to various categories of stakeholders:

Stakeholders' Feedback	PMU Response	CB verification / comments	Follow up comments (if any)
<b>Government Agencies</b> No feedback received.	There has been no feedback / enquiries received from any government Agencies concerning the operations of the PMU.	Verified during on-site assessment that there has been no issues from any Government Agencies concerning the	No further action needed.

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<b>Non-Governmental Organizations</b>		PMU's operations.	
Feedback received.	A positive feedback was received from Neth Vibol of Wildlife Alliance ( <a href="mailto:neth@wildlifealliance.org">neth@wildlifealliance.org</a> ) via email dated 20 Jun 2014. The comments were essentially on the responsible approach taken by MRICOP in relation to environmental protection and benefits to the local communities.	Verified that the operations of MRICOP had implemented measures to conserve natural resources and provide benefits and supports to the local communities.	No further action needed.
<b>Local Communities</b>			
<p>On-site consultation and feedback sessions were held during the assessment with various categories of stakeholders comprising of Village heads, Contractors Local community (School &amp; Clinics), Government agencies, etc. and also employees/ workers were interviewed during the on-site assessment.</p> <p>Concerns and requests raised include:</p> <ul style="list-style-type: none"> <li>• Workers have to bring their own drinking water - Possibility of PMU to provide safe drinking water for workers</li> <li>• Request for fencing around the school and repairs of gate and toilet.</li> <li>• A reported case in year 2013 of intrusion of wild elephants into Kampung Seila village.</li> </ul> <p>Positive comments include:</p> <ul style="list-style-type: none"> <li>• Contributions given to the local communities.</li> <li>• Medical checks and assistance given at the estate clinics.</li> <li>• Adequate positive measures in the social and environmental related issues such as providing employment, protection of natural resources and prevention of pollution.</li> <li>• Good road maintenance.</li> </ul>	<p>The PMU will consider the requests raised and take appropriate actions.</p> <ul style="list-style-type: none"> <li>• Budget for safe drinking water was approved and treated drinking water storage was made available at the Mills for all workers.</li> <li>• Budget for fencing and repairs at the school was approved.</li> <li>• There will be better monitoring at the said village for any wild elephants intrusion and record made on such events.</li> </ul>	<p>Followed up during ASA-03.</p> <ul style="list-style-type: none"> <li>• Verified that safe drinking water was made available for the workers at the PMU.</li> <li>• Fencing and school repairs was completed.</li> <li>• Monitoring records was available. There has been no further incidences any wildlife intrusion at the said village in 2014 and 2015 to date.</li> </ul>	<p>Based on feedback from stakeholders' consultations and interviews during the ASA-03 assessment, there was positive feedback that improvement actions had been taken to address the concerns.</p>
<b>Other Interested parties</b>			
Nil	Nil	Nil	Nil

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### 4.0 ASSESSMENT CONCLUSION AND RECOMMENDATION

Based on the findings above, Mong Reththy Investment Cambodia Oil Palm Co. Ltd., MRICOP had been able to demonstrate its compliance with the RSPO Principles and Criteria (Apr 2013), Cambodian Local Indicators (2014) and the RSPO Supply Chain Certification Standard (Nov 2014) for Palm Oil Mill.

Therefore, it is recommended that the certification of Mong Reththy Investment Cambodia Oil Palm Co. Ltd., MRICOP be approved and continued.

Signed for and on behalf of  
Intertek Certification International Sdn Bhd



Mr. Augustine Loh  
Lead Assessor

Date: 04 Aug 2015

### 4.1 Acknowledgement of Internal Responsibility and Confirmation of Assessment Findings

This is to acknowledge and confirm the assessment visits described in this report and the acceptance of the contents and findings in this assessment report.

Signed for and on behalf of  
Mong Reththy Investment Cambodia Oil Palm Co. Ltd (MRICOP)



Mr. Sumate Pratumswan  
MD – Agriculture/Oil Palm

Date: 05 Aug 2015

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### 4.2 Intertek RSPO Certificate Details for MRICOP Grouping

Certificate No:	RSPO 928088
Issue date:	15 Aug 2012
Expiry date:	14 Aug 2017
New Certificate date:	15 Aug 2015
Organization	Mong Reththy Investment Cambodia Oil Palm Co. Ltd (MRICOP)
Address of Head Office:	#52, St. 598 Sangkat Boeung Kak II, Khan Toul Kork, Phnom Penh, Cambodia.
RSPO Membership No:	1-0109-11-000-00
Plantation Management Unit:	MRICOP Grouping
Standards:	RSPO Principles and Criteria (Apr 2013); Cambodian Local Indicators (2014); RSPO Supply Chain Certification Standards (Nov 2014) for the Palm Oil Mill.
Certification scope:	Production of Crude Palm Oil and Palm Kernels
Supply Chain model for CPO & PK:	Identity Preserved (IP)

Details of Mills and Supply bases covered by this certificate and the tonnage approved are:

Name	Address	GPS Reference		Certified Area (ha)
		Latitude	Longitude	
Monorum Palm Oil Mill Capacity: 30 MT/hour	Mong Reththy Investment Cambodia Oil Palm Co. Ltd., National Road 4, Monorum, Choeng Kor, Prey Nop, Preah Sihanouk Province, Cambodia.	10° 57' 34.9" N	103° 54' 28.2" E	24,831.43
Anlong Kropeu Palm Oil Mill Capacity: 45 MT/hour	MRT-TCC Sugar Investment Co. Ltd., National Road 4, Anlong Kropeu, Choeng Kor, Prey Nop, Preah Sihanouk Province, Cambodia.	10°49' 04.2" N	103°48' 33.1" E	
Estate A (Tapoa)	National Road 4, Sangkat Cheung Kor, Khan Prey Nop, Preah Sihanouk province, Kingdom of Cambodia.	10° 49' 04.2" N	103° 48' 33.1" E	
Estate B (Svay)	National Road 4, Sangkat Cheung Kor, Khan Prey Nop, Preah Sihanouk province, Kingdom of Cambodia.	10° 52' 15.5" N	103° 51' 05.3" E	
Estate C (Anlong Kropeu)	National Road 4, Sangkat Cheung Kor, Khan Prey Nop, Preah Sihanouk province, Kingdom of Cambodia.	10° 57' 34.9" N	103° 54' 28.2" E	

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The annual certified tonnages of CPO and PK production by MRICOP from the supply base as verified during the current assessment are detailed as follows:

### Monorum Mill

POM	FY Jul 2013 / Jun 2014 Actual	FY Jul 2014 / Jun 2015 Actual	FY Jul 2015 / Jun 2016 Projected
Total Certified FFB Processed (MT)	127,948.41	80,040.09	<b>41,355</b>
Total Certified CPO Production (MT)	IP 21,279.66	14,543.08	<b>7,526.61</b>
	SG 1,774.45		
Total Certified PK Production (MT)	IP 4,217.92	3,008.10	<b>1,571.49</b>
	SG 351.72		
SCCS Model for POM	<b>IP/SG</b>	<b>IP</b>	<b>IP</b>

### Anlong Kropeu Mill (Note)

POM	FY Jul 2013 / Jun 2014 Actual	FY Jul 2014 / Jun 2015 Actual	FY Jul 2015 / Jun 2016 Projected
Total Certified FFB Processed (MT)	Not Applicable	45,278.91	<b>96,495</b>
Total Certified CPO Production (MT)	Not Applicable	8,584.88	<b>18,334.05</b>
Total Certified PK Production (MT)	Not Applicable	2,001.33	<b>4,342.28</b>
SCCS Model for POM	<b>Not Applicable</b>	<b>IP</b>	<b>IP</b>

Note. Application for inclusion of this new POM for Multiple Mill Certification was confirmed by the RSPO Secretariat on 21 March 2015

The annual total production output from the MRICOP grouping of estates and mills are as per below:

POM	FY Jul 2013 / Jun 2014 Actual	FY Jul 2014 / Jun 2015 Actual	FY Jul 2015 / Jun 2016 Projected
Total Certified FFB Processed (MT)	127,948.41	125,319	<b>137,850</b>
Total Certified CPO Production (MT)	IP 21,279.66	23,127.96	<b>25,860.66</b>
	SG 1,774.45		
Total Certified PK Production (MT)	IP 4,217.92	5009.43	<b>5,913.77</b>
	SG 351.72		
SCCS Model for POM	<b>IP/SG</b>	<b>IP</b>	<b>IP</b>



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### Appendix A:

#### Qualifications of Lead Assessor and Assessment Team

##### **Mr. Augustine Loh (AL) - Lead Assessor / Team Leader / Technical Expert**

(Palm Oil Mill, Environment, Social, Conservation & HCV area, GAP, IPM, Land Use and Supply Chain)  
– Master in Business Administration, USA and Diploma in Maritime Studies, Singapore

Mr. Augustine Loh is an IRCA Third Party Assessment (TPA) Lead Auditor and IRCA Lead Tutor for IRCA ISO 9001 and OHSAS 18001 Lead Auditor Courses as well as Tutor for RSPO Certification Programs and Integrated Management System in Intertek, Malaysia. He has over 25 years of fieldwork and experience in Palm based product survey, supply chain monitoring, inspection and testing. He has successfully completed the IRCA accredited Lead Auditor course in ISO 9001, ISO 14001, OHSAS 18001, ISO 22001, ISO 27001, RSPO Principles and Criteria Lead Assessor Course, RSPO Supply Chain Certification and the International Sustainable Carbon Certification (ISCC) Lead Auditor courses. He has also completed the RSPO training on RSPO P&C, RSPO Palm GHG tool and RSPO RED requirements. He has conducted assessments of organizations in Malaysia, Singapore, Indonesia, Brunei, Thailand, Cambodia and Australia. He is currently the RSPO Regional Program Manager of Intertek Certification International, Malaysia and has performed over 800 auditing days on quality, environmental and safety & health assessments in various sectors including oil palm plantations. He was the RSPO CB Assessment Team Leader / Member which audited several RSPO certified Plantation Management Units since 2009. He was the CB Team Leader in the stakeholder consultation and development of the RSPO Cambodian Local Indicators. He is a member of the CB Internal Review Panel for RSPO Assessment reports since 2010.

##### **Mr. Chen Fai Kok (CFK) – Assessor / Technical Expert**

Palm Oil Mill, Good Agriculture Practice and Integrated Pest Management)  
– Diploma in Agriculture

Mr. Chen Fai Kok has over 30 years work experience in the plantation sector. He has held a Senior Management role in the estate field operations including GAP and IPM. He had also served as the Branch Chairman of the Incorporated Society of Planters (ISP) in several branches for over 20 years. He has successfully completed training in Estate Management and the Intertek In House RSPO P&C, MYNI and Cambodian LI Assessor courses. He is a member of the RSPO CB Assessment team which audited several RSPO certified Plantation Management Units since 2009.

##### **Mdm. Ham Fin Lan (HFL) – Assessor / Technical Expert**

(Social)  
– Bachelor Science in Nursing Science

Madam Ham Fin Lan has over 30 years experience in nursing including public health, maternal and child health and mental health. She was a Chief Nursing Administrator cum Matron and Clinical Instructor with a government hospital. She has successfully completed the IRCA accredited Lead Auditor course in ISO 9001:2000. She has also completed the necessary training in SA8000 auditing and upgrading of auditor course in ISO 9001:2008 and was trained on the RSPO P&C MYNI assessment requirements. She has performed over 60 auditing days on areas relating to health care and services in various hospitals and clinics. Other auditing experiences include auditing in areas covering domestic violence, sexual harassment, sexual crime and child abuse. She was part of the RSPO Assessment team which audited several RSPO certified Plantation Management Units since 2009. She was a CB Team member in the stakeholder consultation and development of the RSPO Cambodian Local Indicators.

##### **Mr. Sazali bin Hasni (SH) – Assessor / Technical Expert**

(Environment, Conservation and HCV area)  
- Bachelor of Science (Forestry)

Mr. Sazali Hasni has over 25 years work experience in the forestry sector. He is an IRCA Auditor for ISO 9001 and auditor for the PEFC Chain-of-Custody Certification. He has successfully completed training in the Intertek In House RSPO P&C, MYNI Assessor course. He was a member in the stakeholder consultation and development of the Malaysian Criteria & Indicators (MC&I) for Forest management Certification. He has been involved in the auditing of Forest Management Certification for the Perak State Forestry Department and Pahang State Forestry Department. He has also been involved with a German based company in testing their criteria for carbon tracing in an oil palm plantation in 2011. He had also acted as the regional consultant to International Tropical Timber Organization (ITTO) for the Asia Pacific region in the Evaluation and Monitoring of Projects funded by the organization from 1994 to 1998. Projects funded are mainly forestry related such as reforestation, conservation, community forestry apart from other research based projects. He is a member of the RSPO CB Assessment team which audited several RSPO certified Plantation Management Units since 2014.

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### **Mr. Reaksa Rous (RR) – Local Expert**

(Local Expert cum Interpreter)

– Master in Political Science & International Relations, Diploma in Criminology & Crime Administration, BBA in Management

Mr. Reaksa Rous had held several work positions since 1991 till to date as a Teacher, Lecturer, Trainer, Interpreter and Consultant. He has over 10 years experience and knowledge of Cambodian laws and regulations including Agriculture, Social and Environmental related laws. His experiences include specialization in Khmer Literature, Drug Enforcement Law, Nature Crime Investigation on Wildlife and Labor Migration Policies and Management. He was a CB Local Technical Expert cum Interpreter in the stakeholder consultation and development of the RSPO Cambodian Local Indicators in 2012.

### **Mr. Yin Soeum (YS) – Local Expert**

(Local Expert cum Interpreter)

– Master in Political Science & Public Administration (University of Poly-Technology)

Mr. Yin Soeum had held several work positions since 1990 till to date as a Reporter, HR Officer, Trainer, Interpreter and Consultant. He has over 10 years experience and knowledge of Cambodian laws and regulations including Agriculture, Social and Environmental related laws. His experiences include specialization in Khmer Literature, Human Rights, Demining, Sanitation & Environment and Labor Migration Policies and Management.

He was engaged as a CB Local Expert cum Interpreter for the RSPO P&C and Cambodian Local Indicators in July 2015.

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### Appendix B:

#### Assessment Plan (Actual)

Date	Time	Assessors and Assessment Activity				
		Assessment Team				
06/07/15  Day 1	8.00 am – 11.00 am	Travel by Flight to Phnom Penh, airport				
	11.00 am – 1.00 noon	Travel by road to MRICOP grouping Palm Oil Mill (POM) Office at Sihanoukville				
	1.00 pm – 2.00 pm	Lunch Break				
	2.00 -2.30 pm	Opening Meeting and Briefing at MRICOP POM Office (to be attended by representatives from the Estates as well)				
	2.30 -5.00 pm	<b>AL</b>	<b>SZ</b>	<b>CFK</b>	<b>HFL</b>	<b>RR &amp; YS</b>
		<b>Site assessment at Palm Oil Mill</b> <ul style="list-style-type: none"> <li>• P1 Transparency</li> <li>• P2 Laws &amp; regulations</li> <li>• P3 Economic &amp; Financial Viability</li> <li>• P8 Continual Improvement</li> <li>• Supply Chain for POM (SCCS)</li> </ul>	<b>Site assessment at Palm Oil Mill</b> <ul style="list-style-type: none"> <li>• P2 Laws &amp; regulations</li> <li>• P5 Environmental, Conservation, Practices at Mill</li> <li>• P8 Continual Improvement</li> </ul>	<b>Site assessment at Palm Oil Mill</b> <ul style="list-style-type: none"> <li>• P2 Laws &amp; regulations</li> <li>• P4 Best Practices at Mill</li> <li>• P8 Continual Improvement</li> </ul>	<b>Site assessment at Palm Oil Mill</b> <ul style="list-style-type: none"> <li>• P2 Laws &amp; regulations</li> <li>• P6 Employees, Individuals &amp; Communities incl. Gender Issues at Mill</li> <li>• P8 Continual Improvement</li> </ul>	<b>Site assessment at Palm Oil Mill</b> <ul style="list-style-type: none"> <li>• Assisting Auditors</li> <li>• P2 Laws &amp; regulations</li> <li>• P4 –P8</li> </ul>
	<ul style="list-style-type: none"> <li>• Document Review and Assessment by all Assessors on respective RSPO P&amp;C:1 to 8 at POM</li> <li>• Review of changes for compliance to revised RSPO P&amp;C, CLI and SCCS</li> <li>• Review of Time Bound Plan</li> <li>• Verification for compliance with rules on partial certification</li> <li>• Verification and follow up on NCs and Obs issued in previous assessment</li> </ul>					
5.00 pm – 6.00 pm	Travel to Hotel & Break					
6.00 pm – 7.00 pm	Team Meeting and Discussion					

Date	Time	Assessors and Assessment Activity				
		AL	SZ	CFK	HFL	RR & YS
07/07/15  Day 2	8.30 am – 12.30pm	<b>Site assessment at New Mill (2)</b> <ul style="list-style-type: none"> <li>• P1 Transparency</li> <li>• P2 Laws &amp; regulations</li> <li>• P3 Economic &amp; Financial Viability</li> <li>• P8 Continual Improvement</li> <li>• Supply Chain for POM (SCCS)</li> </ul>	<b>Site assessment at Estate C</b> <ul style="list-style-type: none"> <li>• P2 Laws &amp; regulations</li> <li>• P5 Environmental, Conservation, Practices at Estate &amp; Mill</li> <li>• P8 Continual Improvement</li> </ul>	<b>Site assessment at Estate C</b> <ul style="list-style-type: none"> <li>• P2 Laws &amp; regulations</li> <li>• P4 Best Practices at Estate &amp; Mill</li> <li>• P8 Continual Improvement</li> </ul>	<b>Site assessment at Estate C</b> <ul style="list-style-type: none"> <li>• P2 Laws &amp; regulations</li> <li>• P6 Employees, Individuals &amp; Communities incl. Gender Issues at Estate</li> <li>• P8 Continual Improvement</li> </ul>	<b>Site assessment at Estate C</b> <ul style="list-style-type: none"> <li>• Assisting Auditors</li> <li>• P2 Laws &amp; regulations</li> <li>• P4 –P8</li> </ul>
	12.30 pm – 1.30 pm	Lunch Break				
	1.30 pm - 5.00 pm	<b>Continue site assessment at New Mill (2)</b>	<b>Continue site assessment at Estate C</b>	<b>Continue site assessment at Estate C</b>	<b>Continue site assessment at Estate C</b>	<b>Continue site assessment at Estate C</b>
	5.00 pm –	Travel to Hotel & Break				

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	6.00 pm	Team Meeting and Discussion
	6.00 pm – 7.00 pm	

Date	Time	Assessors and Assessment Activity				
		AL	SZ	CFK	HFL	RR & YS
08/07/15 Day 3	8.30 am – 12.30pm	<b>Site assessment at Old Mill (1)</b> <ul style="list-style-type: none"> <li>• P1 Transparency</li> <li>• P2 Laws &amp; regulations</li> <li>• P3 Economic &amp; Financial Viability</li> <li>• P8 Continual Improvement</li> <li>• Supply Chain for POM (SCCS)</li> </ul>	<b>Site assessment at Old Mill (1)</b> <ul style="list-style-type: none"> <li>• P2 Laws &amp; regulations</li> <li>• P5 Environmental, Conservation, Practices at Mill / Estate</li> <li>• P8 Continual Improvement</li> </ul>	<b>Site assessment at Old Mill (1)</b> <ul style="list-style-type: none"> <li>• P2 Laws &amp; regulations</li> <li>• P4 Best Practices at Mill /Estate</li> <li>• P8 Continual Improvement</li> </ul>	<b>Site assessment at Old Mill (1)</b> <ul style="list-style-type: none"> <li>• P2 Laws &amp; regulations</li> <li>• P6 Employees, Individuals &amp; Communities incl. Gender Issues at Mill / Estate</li> <li>• P8 Continual Improvement</li> </ul>	<b>Site assessment at Old Mill (1)</b> <ul style="list-style-type: none"> <li>• Assisting Auditors</li> <li>• P2 Laws &amp; regulations</li> <li>• P4 –P8</li> </ul>
	12.30 pm – 1.30 pm	Lunch Break				
	1.30 pm - 5.00 pm	<b>Continue site assessment at Old Mill (1)</b>	<b>Site assessment at Estate A</b> <ul style="list-style-type: none"> <li>• P2 Laws &amp; regulations</li> <li>• P5 Environmental, Conservation, Practices at Mill</li> <li>• P8 Continual Improvement</li> </ul>	<b>Site assessment at Estate A</b> <ul style="list-style-type: none"> <li>• P2 Laws &amp; regulations</li> <li>• P4 Best Practices at Mill</li> <li>• P8 Continual Improvement</li> </ul>	<b>Site assessment at Estate A</b> <ul style="list-style-type: none"> <li>• P2 Laws &amp; regulations</li> <li>• P6 Employees, Individuals &amp; Communities incl. Gender Issues</li> <li>• P8 Continual Improvement</li> </ul>	<b>Site assessment at Estate A</b> <ul style="list-style-type: none"> <li>• Assisting Auditors</li> <li>• P2 Laws &amp; regulations</li> <li>• P4 –P8</li> </ul>
	5.00 pm – 6.00 pm	Travel to Hotel & Break				
	6.00 pm – 7.00 pm	Team Meeting and Discussion				

Date	Time	Assessors and Assessment Activity				
		AL	SZ	CFK	HFL	RR & YS
09/07/15 Day 4	8.30 am – 12.30pm	<b>Site assessment at POM or estates to follow up on any specific criteria/areas</b>				
	12.30 pm – 1.30 pm	Lunch Break				
	1.30 pm - 4.00 pm	<b>Stakeholders' Consultation on the following categories (see Notes 1 and 2 below):</b> <ul style="list-style-type: none"> <li>• <b>Contractors</b></li> <li>• <b>Suppliers</b></li> <li>• <b>Transporters</b></li> <li>• <b>NGOs</b></li> <li>• <b>Government Department / Agencies</b></li> <li>• <b>Local Community</b></li> <li>• <b>Settlers, in the case of independent and organized smallholders.</b></li> </ul> <p>Notes</p> <p>1. It is mandatory for the PMU to inform Intertek and provide the information (as a minimum the no. of stakeholders in each applicable category and contact number) on the stakeholders <u>prior</u> to the assessment.</p> <p>2. This will facilitate the random and impartial selection of stakeholders (including independent and organized smallholders, where applicable) and to meet the sample size requirement.</p>				
	4.00 pm – 5.00 pm	Preparation for Closing Meeting				
	5.00 pm – 5.30 pm	Team Meeting and Discussions with PMU Management Representative				
	5.30 pm – 6.00 pm	<b>Closing Meeting &amp; Briefing at Palm Oil Mill Office</b>				

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	6.00 pm – 7.00 pm	Travel to Hotel & Break
Date	Time	Assessors and Assessment Activity
10/07/15 Day 5	8.00 am onward	Travel from Sihanoukville back to Phnom Penh
11/07/15	Morning	Flight back from Phnom Penh to Kuala Lumpur

**Appendix C-1:**

**Location Map of MRICOP, Cambodia (Map Scale 1:100km)**

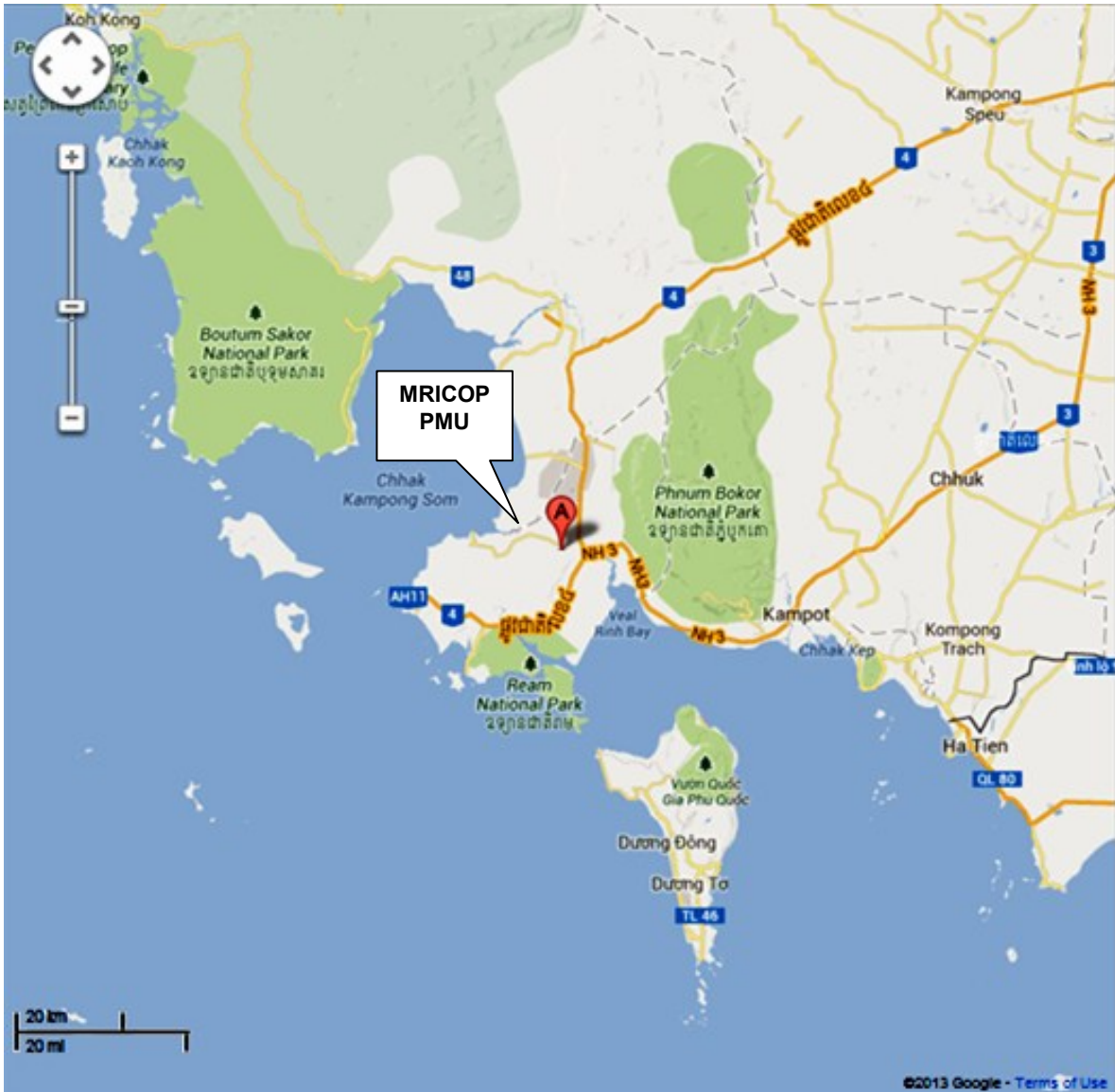


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**Appendix C-1-2:**

**Location Map of MRICOP Choeung Kor Commune, Prey Nop District, Sihanoukville, Cambodia (Map Scale 1: 20km)**





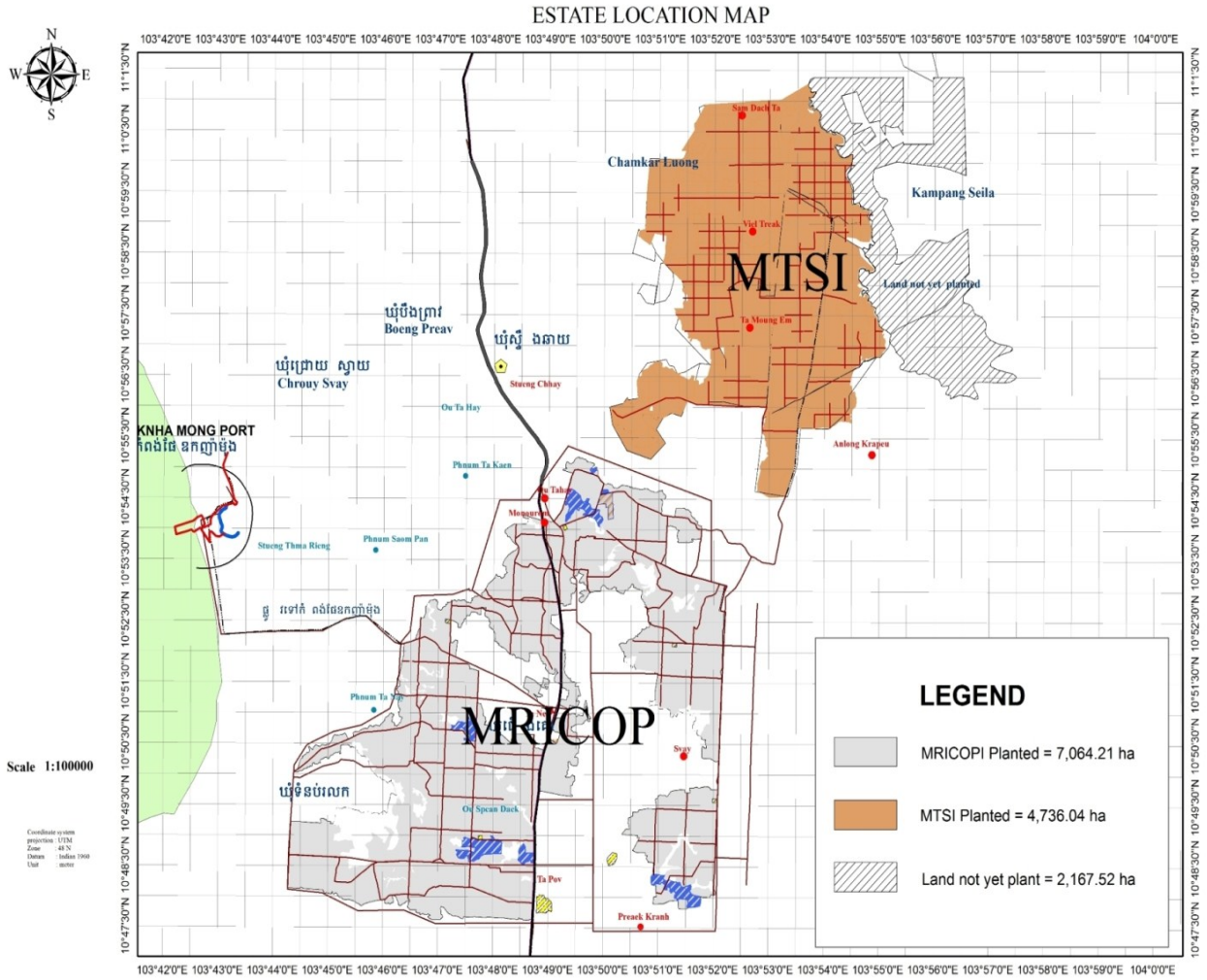
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## Appendix C-2:

### Location of Estates and surrounding landscape





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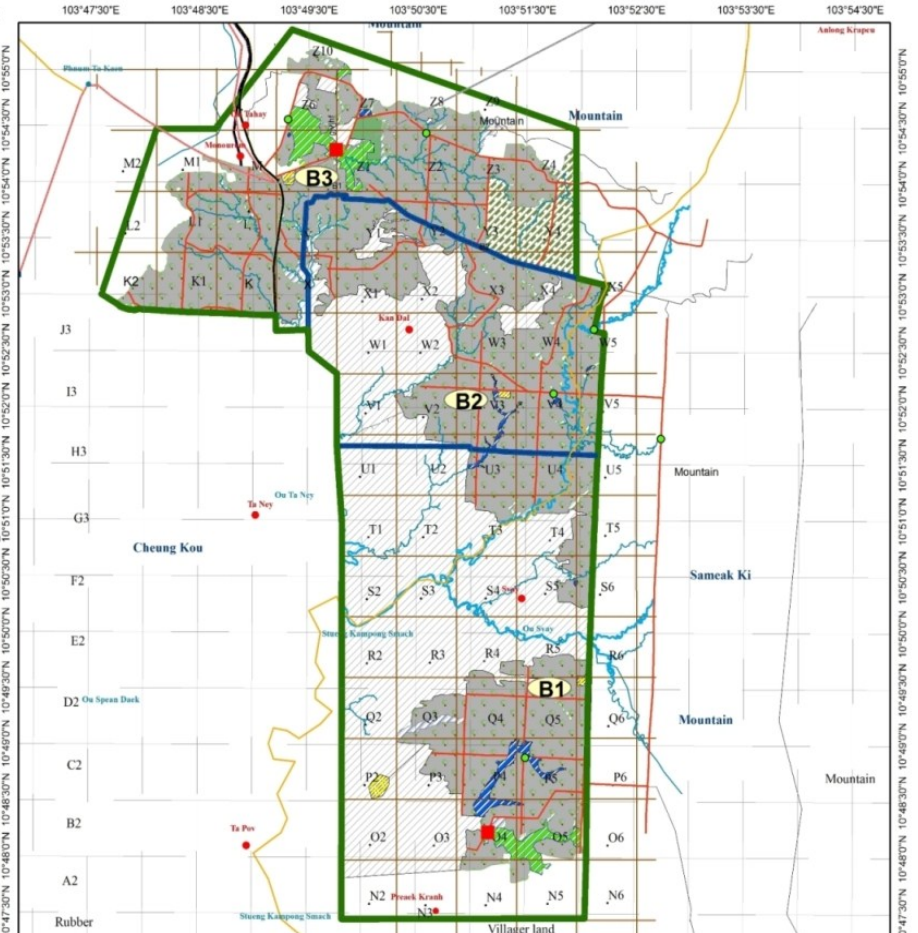
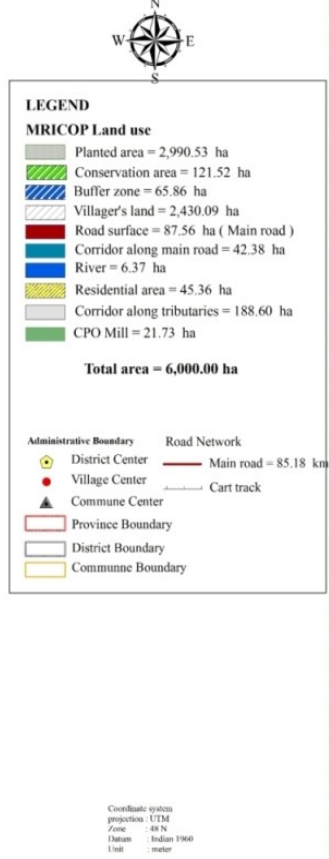
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## Appendix C-2-2:

### Land Use Map – Estate B

#### MRICOP LAND USE MAP ESTATE B





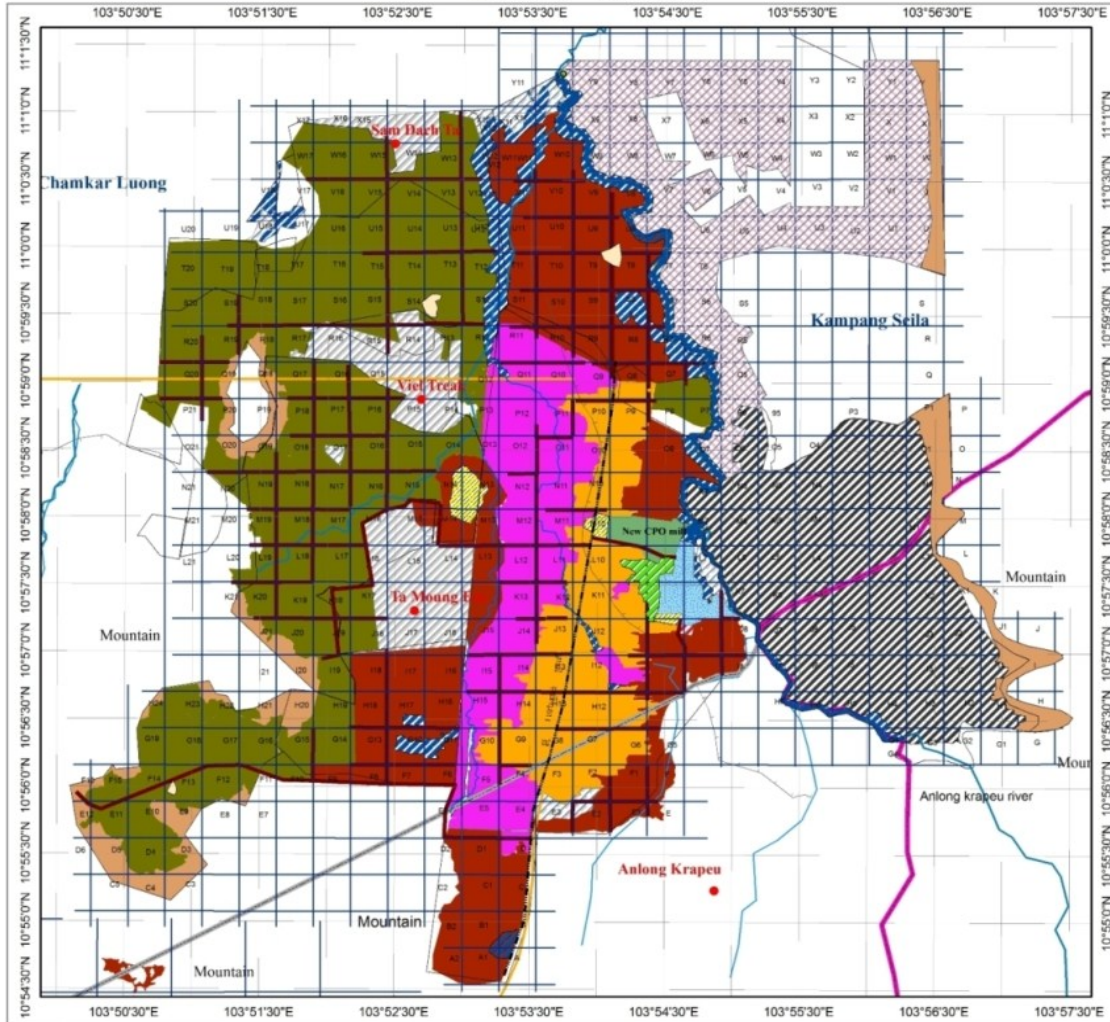
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**Appendix C-2-3:**  
**Land Use Map – Estate C**

**MTSI LAND USE MAP (ESTATE C)**

Total area = 8,287.58 ha



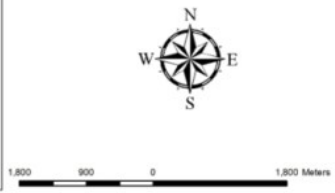
**LEGEND**

**MTSI Land use**

	Planted area 2008 = 599.86 ha
	Planted area 2009 = 625.64 ha
	Planted area 2010 = 1415.54 ha
	Planted area 2011 = 2095.00 ha
Total = 4,736.04	
	Conservation area = 27.18 ha
	Buffer zone = 487.29 ha
	HCV = 2.32 ha
	Corridor along the hill side = 415.72 ha
	Road surface = 146.04 ha
	River = 7.02 ha
	Residential area = 9.60 ha
	CPO Mill = 50.00 ha
	Nursery = 34 ha
	Laterite and rockr = 204.85 ha
	Land clearing = 1,182.56 ha
	Land not yet clearing = 984.96 ha
<b>Total area = 8,287.58 Ha</b>	

**LEGEND**

	District Center		Road
	Village Center		Cart track
	Commune Center		
	Province Boundary		
	District Boundary		
	Commune Boundary		



Coordinate system  
projection: UTM  
datum: WGS 84  
units: meters  
spheroid: Everest

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**Appendix D:**

**Photographs taken at MRICOP Grouping (ASA-03)**



At the Group Mill office, assessors given briefing and presentation on the overall performance and changes at the PMU.



The entrance to new mill at Anlong Krapeu.



At new POM, safety signages for appropriate PPE to be worn in English and 'Khmer' languages.



At new POM generator operations, Policy and Procedures displayed available in English and 'Khmer' languages and appropriate PPE worn.



At new POM, layout of the effluent treatment ponds.



At new POM, weighbridge facility



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<p>At Estate C, F J20- Harvester not wearing safety helmet although it had been provided.</p>	<p>At Estate C, F U24- Inter-row ploughed for planting of cover crop.</p>
	
<p>At Estate A, F H4- Fronds had been spread in the inter-row to improve soil and water conservation.</p>	<p>At Estate A, F H4- Contents in the First Aid Kits.</p>
	
<p>Estate A, F H4- Slashing gang with safety helmet and boots, but not wearing hand gloves.</p>	<p>Estate A, F J1- Stream after crossing culvert, no marking of buffer zone and signage for buffer zone.</p>



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Medical services include ambulance available for any emergency cases.	Stakeholder consultations conducted with the local Community representatives and village heads.

**Appendix E:**

**Time Bound Plan**

At present, there are no other management units owned under MRICOP.

---End of Report---