



MOODY INTERNATIONAL CERTIFICATION (MALAYSIA) SDN BHD
(188296-W)

Report No.: R2020/10-1 IOI Corporation Berhad - Pukin

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RSPO CERTIFICATION ASSESSMENT
PUBLIC SUMMARY REPORT

IOI CORPORATION BERHAD
(9027-W)

RSPO Membership No: 2-0002-04-000-00

MANAGEMENT UNIT
Pukin Grouping, Johor, Malaysia

Certificate No: RSPO 927888
Issued date: 13 June 2012
Expiry date: 12 June 2017

Assessment Type **Assessment Dates**
Initial Certification 08 – 11 December 2010
Surveillance 1
Surveillance 2
Surveillance 3
Surveillance 4
Re-Certification

Moody International Certification (Malaysia) Sdn. Bhd. (188296-W)
6-L12-01, Level 12, Tower 2, Menara PGRM No. 6 & 8 Jalan Pudu Ulu, Cheras, 56100 Kuala Lumpur, Malaysia
Telephone:+00 (603) 9283 9881 Facsimile:+00 (603) 9284 8187 Email: ba.service@intertek.com
Website: www.intertek.com; www.moodyint.com



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1.0 SCOPE OF CERTIFICATION ASSESSMENT

1.1 Introduction

This certification assessment was conducted on the Pukin Grouping-Plantation Management Unit (PMU) of IOI Corporation Berhad, on the **8 to 11 December 2010**, to assess if the organization's operations of the mill and its supply bases were in compliance against the RSPO Principles and Criteria (October 2007); Malaysian National Interpretation (MY-NI, November 2010) and RSPO Supply Chain Certification (November 2009) for POM.

The plantation management unit (PMU) or management unit is equivalent to a certification unit as defined in the RSPO Certification Systems Document. Each PMU consists of one mill and its supply bases which are made up of estates owned by IOI Corporation Berhad (IOI).

1.2 Location (address, GPS and map)

The PUKIN GROUPING-PMU consist of one (1) palm oil mill namely Pukin Palm Oil Mill and four (4) estates i.e. Pukin, Shahzan 1, Shahzan 2 and Segamat estates. Details of the addresses and locations are as indicated in **Table 1**. The location, field and topography maps are detailed in **Appendix C1 – C9**.

Table 1: Address and GPS Location

Name	Address	GPS Reference	
		Latitude	Longitude
Pukin Palm Oil Mill	30km, Lebuhraya Tun Abdul Razak, Keratong, Rompin, Pahang	02° 43'07.9" N	102° 54'28.7" E
Pukin Estate	30km, Lebuhraya Tun Abdul Razak, Keratong, Rompin, Pahang	02° 43'07.9" N	102° 54'28.7" E
Shahzan 1 Estate	30km, Lebuhraya Tun Abdul Razak, Keratong, Rompin, Pahang	02° 47'58.5" N	102° 50'56.3" E
Shahzan 2 Estate	36km, Lebuhraya Tun Abdul Razak, Keratong, Rompin, Pahang	02° 48'59.6" N	102° 52'26.5" E
Segamat Estate	Km 5, Jalan Segamat Muar, 85009 Segamat, Johor	02° 29'22.0" N	102° 52'58.5" E

1.3 Description of supply base (fruit sources)

The 4 estates which are owned by IOI are the main sources of FFB to the POM at PUKIN GROUPING-PMU as indicated in **Table 2**.

There were other estates owned by IOI, which also supplied FFB to the POM. These other supply bases have also been considered in the overall assessment on PUKIN GROUPING-PMU and have been verified to be part of the Time Bound Plan committed by IOI for certification. **(Refer to para.1.8)**

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Table 2: Estate Area Summary and FFB Production

Estate	Area Summary (ha)		FFB (MT)	Immature (ha)
	Total	Planted		
Pukin Estate	2,437.26	2,198.0	20,975.26	629.0
Shahzan 1 Estate	1,562.95	1,517.0	25,045.86	Nil
Shahzan 2 Estate	1,640.77	1,602.0	32,633.76	Nil
Segamat Estate	1,921.62	1,779.0	24,959.39	Nil
Total	7,562.60	7,096.0	103,614.27	629.0

Note: The FFB production figures above were the actual output submitted for the financial year June 2009 to July 2010.

1.4 Date of plantings and cycle

The 4 estates were developed between 1988 and 2006 and are mainly in the 1st cycle of planting except for the Pukin estate which has started on some re-planting (2nd cycle). The replanting at Pukin estate was done in stages from 2007 to 2010 between 168 to 250 hectares annually. The age profile is as shown in Table 3.

Table 3: Age Profile of Planted Oil Palm

Year of Planting	Age of Palm (years)	Planted (Ha)			
		Pukin	Shahzan 1	Shahzan 2	Segamat
2007-2010	< 3 (immature)	629.0	-	-	-
2004-2006	3-5	-	-	-	96.0
1994-2003	6-15	1,384.0	1,517.0	1,602.0	694.0
1988-1993	16-25	185.0	-	-	989.0
Total		2,198.0	1,517.0	1,602.0	1,779.0

Note: The above data are extracted from the respective Area Statement submitted as at 30 November 2010.

1.5 Other certifications held and Use of RSPO Trademarks

PUKIN GROUPING-PMU does not hold any other certifications.

1.5.1 The RSPO's trademarks and logo are not being used by the PMU audited.

1.6 Organisational information / Contact Person

Mr. Too Heng Liew
 Head of Sustainability
 IOI Corporation Berhad
 Level 8, Two IOI Square, IOI Resort,
 62502 Putrajaya, Malaysia
 Tel: + 603 8947 8888
 Fax: + 603 8947 8888
 Email: hl.too@ioigroup.com

1.7 Time Bound Plan for Other Management Units

IOI operates 12 palm oil mills and 77 oil palm estates throughout Malaysia and Indonesia. The organization is a pioneering member of RSPO and has been taking an active role in the RSPO certification processes since 2004. Currently, a significant number of its Plantation Management Units (PMU) is undergoing the RSPO certification process in accordance with its time bound plan to achieve RSPO certification for all its PMUs by 2016. Details of the time bound plan as submitted by IOI are as per **Appendix F**.

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1.8 Tonnages Certified

The breakdown of the all suppliers and their estimated tonnages of FFB supplied to the POM of PUKIN GROUPING-PMU from June 2009 to July 2010 were as follows:

#	Estate /Supplier	FFB Processed (MT)	Main Receiving Mill	Details of RSPO Assessed / Certified FFB (if any)
1	Pukin Estate	20,975.26	Pukin Oil Mill	Covered under this report.
2	Shahzan 1 Estate	25,045.86	Pukin Oil Mill	
3	Shahzan 2 Estate	32,633.76	Pukin Oil Mill	
4	Segamat Estate	24,959.39	Pukin Oil Mill	
5	Leepang A	19,713.38	Bukit Leelau Oil Mill	Covered under SIRIM QAS International Certificate no: RSPO 010 dated 19 November 2010 - Bukit Leelau Grouping.
6	Laukin A	9,439.99	Bukit Leelau Oil Mill	
7	Detas	1,619.28	Bukit Leelau Oil Mill	
8	Merchong	1,289.16	Bukit Leelau Oil Mill	
9	Mekassar	771.92	Bukit Leelau Oil Mill	
10	Bukit Leelau	1,528.57	Bukit Leelau Oil Mill	
11	Bukit Serampang	217.97	Gomali Oil Mill	Covered under SGS Certificate no: RSPO/PM-00573 dated 23 August 2010-Gomali Grouping.
12	Sagil	92.39	Gomali Oil Mill	
13	Manna (Outgrower)	9.58	Bukit Leelau Oil Mill	N.A
14	Ladang Haji Harun (Outgrower)	4.42	Bukit Leelau Oil Mill	N.A
15	IOI Resort	1.58	Gomali Oil Mill	N.A
	Total	138,302.51		

The summary of the total estimated tonnages of FFB supplied from the 4 estates assessed and other suppliers at PUKIN GROUPING-PMU is as per below:

#	Estate / Supplier	FFB Processed (MT)
1 - 4	As indicated above	103,614.27
5 - 15	Other Suppliers / Sources	34,688.24
	Total	138,302.51

Note:

- All the estates / suppliers are under RSPO assessed / certified sources as indicated above except for outgrowers - Manna Estate, Ladang Haji Harun and the FFB from IOI Resort.
- Therefore the FFB processed by PUKIN GROUPING-PMU from RSPO assessed estates / suppliers totals about **138, 286.93 metric tons** (i.e. 138,302.51 less 15.58 MT).

Based on details above, the approximate annual certifiable tonnages of CPO and PK production under PUKIN GROUPING-PMU are detailed as follows:

FFB Processed (MT) from RSPO assessed / certified sources	CPO Production claimed for certification (MT)	PK Production claimed for certification (MT)
138,286.93	31,139.91	6,562.70

Book keeping requirements for the CPO at the POM was also assessed and found to be capable of complying with the relevant elements of the RSPO Supply Chain Certification for the POM. Monitoring of CPO quantities which is based on

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the **Mass Balance model** is verified. Details of activities checked for the Supply Chain requirements at the POM are as per **Appendix G** to this report.

The annual tonnages of CPO and PK production by the PMU and estates and certified suppliers as assessed (based on 2009 /2010 verified data) are detailed as follows:

FFB Processed (MT) from RSPO assessed / certified sources	CPO Production (MT)	PK Production (MT)
138,286.93	31,139.91	6,562.70
	OER: 22.52%	KER: 4.75%
Note1: Production quantities / volumes for 2010 / 2011 (as submitted) are:		
195,170.30	42,550.60	7,863.00
	OER: 21.80%	KER: 4.03%
Note2: Projected production quantities / volumes for 2011 / 2012 are:		
265,460.00	60,392.00	13,273.00
	OER: 22.75%	KER: 5.00%
Note3: 100% of FFB to be received by Pukin Oil Mill will be RSPO certified subject to Pukin PMU being certified.		

1.9 Abbreviations Used

AMESU	All Malayan Estate Staff Union	MSDS	Material Safety Data Sheets
CHRA	Chemical Health Risk Assessment	MTCS	Malaysia Timber Certification Scheme
CPO	Crude Palm Oil	NCR	Non-Conformance Report
CSDS	Chemical Safety Data Sheets	NGO	Non-Government Organisation
DOE	Department of Environment	NUPW	National Union Plantation Workers
ECC	Employees Consultative Council	OER	Oil Extraction Rate
EHS	Environmental Health & Safety	OSH	Occupational Safety & Health
EFB	Empty Fruit Bunch	PEFC	Programme for the Endorsement of Forest Certification
EIA	Environmental Impact Assessment	PK	Palm Kernel
ERT	Endangered, Rare & Threatened species	PKO	Palm Kernel Oil
ETP	Effluent Treatment Plant	POM	Palm Oil Mill
FFB	Fresh Fruit Bunch	POME	Palm Oil Mill Effluent
GAP	Good Agriculture Practice	PPE	Personal Protective Equipment
HCV	High Conservation Values	SIA	Social Impact Assessment
IPM	Integrated Pest Management	SOP	Standard Operating Procedures
IUCN	International Union for Conservation of Nature	SOCISO	Social Security Insurance
KER	Kernel Extraction Rate	TQEM	Total Quality Environment Management
LTA	Lost Time Accidents	USECHH	Use and Standards of Exposure of Chemicals Hazardous to Health
MICM	Moody International Certification (Malaysia) Sdn Bhd		



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2.0 ASSESSMENT PROCESS

2.1 Assessment Methodology, Programme and Site Visits

Assessment methodology included physical site inspections, observing relevant processes, including healthcare activities, interviewing the Mill Manager, Estate Managers, Executives, operational staff, foreign workers, female workers and their families, external stakeholders, including NGOs, review of documentation, verification of records, communications and monitoring data. Checklist and questionnaires were widely used. Samples for assessment were taken on a random basis. Details of assessment programme are given in **Appendix B**.

This report has been independently reviewed for conformance with the RSPO certification system requirements and reviewed for its technical content by the MICM Internal Review Panel.

2.2 Date of next scheduled visit

The next scheduled visit is the surveillance audit which will be carried out within 12 months from the date of RSPO acceptance of this public summary report.

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 Moody is the trading name / brand name of Moody International Certification (Malaysia) Sdn Bhd. The Intertek Moody Group 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, Marine Sustainability Chain-of-Custody, MTCS and PEFC Chain-of Custody certification in applicable industry sectors including the agricultural and forestry sectors. Intertek Moody operates globally providing clients with a wide-ranging technical inspection expertise and access to thousands of skilled specialists worldwide. Our Management Systems Certification business is ranked in the top 10 worldwide, and is available globally offering certification across a wide range of industries.

2.5 Outline of how stakeholder consultation was managed

Stakeholder consultations began with notification of upcoming assessment through websites of RSPO, IOI and MICM. E-mails, facsimiles and letters of the same were sent to applicable stakeholders including government agencies and NGOs.

Telephone enquiries were made and received prior to the actual assessment from a few stakeholders and were dealt with accordingly.

During the assessment stakeholders were interviewed and their feedbacks were recorded. Among the stakeholders consulted were workers, employee consultative committee leaders and members, women representatives, government departments / agencies and NGOs.



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The list of stakeholders consulted was as follows:

Government Agencies

Department of Environment
Department of Forestry
Department of Occupational Safety & Health
Department of Wildlife & National Parks

Department of Indigenous People Affairs
Department of Immigration
Labour Department
Land Office

NGOs

Environmental Protection Society Malaysia (EPSM)
Malaysian Nature Society
Proforest Sdn Bhd
Sustainable Development Network Malaysia (SUSDEN)

Tenaganita Sdn Bhd
Wild Asia, Malaysia
Wetlands International (Malaysia)
World Wildlife Fund (WWF), Malaysia

Others

AMESU HQ, Petaling Jaya
Gender Committee Members
Malaysia Crop Care and Public Health Association
Malaysian Palm Oil Board

NUPW Kluang Branch
NUPW POM Committee Members
The Malayan Estates Staff Cooperative Society Bhd
Social Security for Employees (SOCSO)

3.0 ASSESSMENT FINDINGS

3.1 Summary of findings

Principle 1: Commitment to transparency

Criterion 1.1 Oil palm growers and millers provide adequate information to other stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages & forms to allow for effective participation in decision making.		Compliance Outcome
Initial-R2020/10-1	<p>The procedure for providing information and handling responses and requests was available at the IOI- PUKIN GROUPING-PMU and records of correspondences made were maintained.</p> <p>The mill and estate management have responded constructively and promptly to requests for information from other stakeholders. This was evident from records sighted among which were letters, correspondences and minutes of meetings held with the local authorities, employee consultative committees and local community leaders.</p>	Complied
Criterion 1.2 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.		Compliance Outcome
Initial-R2020/10-1	<p>In line with the organization's policies IOI, PUKIN GROUPING-PMU has hard copies of the 7 types of documents that are required to be made available to the public. Similar documents were available in the IOI website.</p> <p>The statement that these documents can be made available to the public upon request is also stipulated in the estates management plans.</p>	Complied

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Principle 2: Compliance with applicable laws and regulations

Criterion 2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	Compliance Outcome
<p>Initial-R2020/10-1</p> <p>The PUKIN GROUPING-PMU has established a documented system explaining the mechanism for identifying, determining, reviewing and updating applicable legal and other requirements that the PMU has subscribed to.</p> <p>The legal register covering applicable local and international laws and regulations were available at the mill with the Mill Manager and at each estate with the Estate Managers. The Mill and Estate Managers maintain the tracking for any changes in legal requirements. These were reviewed on yearly basis and updated (when necessary) with the compliance status indicated. The relevant legislations identified and listed were among others regarding safety and health, environmental management, pollution management, chemical handling, usage and storage, schedule waste management. The Social Impact Assessments and Management Plans were made available at all the estates.</p> <p>During the site observations, interviews and records checking at the field and mill, there was sufficient evidence of compliance with the relevant laws, regulations, local and international laws at that the POM and estates.</p> <p>However, the medical surveillance performed in the estates were not adequate as it did not cover all the workers involved in handling of chemicals as required by Regulation 27 of OSH (USECHH) Regulation 2000 and the recommendation of the Chemical Hazards Risk Assessment (CHRA) report. In year 2009 till current in December 2010, the estates within the grouping did not send all workers who were exposed to chemicals for the annual medical surveillance by the Occupational & Health Dept. e.g. at the Segamat estate, in 2009 - only 2 employees and in 2010 – only 6 employees out of a total of 43 workers were medically examined.</p>	<p>See NCR # 1</p>
Criterion 2.2 The right to use the land can be demonstrated, and is not legitimately contested by local communities with demonstrable rights.	Compliance Outcome
<p>Initial-R2020/10-1</p> <p>Copies of the land titles of all estates were sighted. The original copies are maintained by the Corporate Head office.</p> <p>The palm oil mill (POM) is located at the Pukin Estate. The estate lands were planted with oil palm trees since 1988 and the 1990's.</p> <p>There has been no recorded dispute over the ownership of the land. Legal boundary markers were sighted and maintained along the perimeters of estate lands which were mapped with a 1 - meter differential Global Positioning System (GPS).</p>	Complied
Criterion 2.3 Use of the land for oil palm does not diminish the legal rights, or customary rights, of other users, without their free, prior and informed consent.	Compliance Outcome
<p>Initial-R2020/10-1</p> <p>The estate lands at the PMU are legally owned by IOI and no other users were identified in the land area.</p> <p>There has been no dispute on the land rights at all the estate areas assessed as there were relatively no villages except for the Segamat estate. At the Segamat, there was no dispute from the local villages. Letters of consent to use the access roads at the estates, as right of way has been produced during the assessment.</p>	Complied

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

Criterion 3.1 There is an implemented management plan that aims to achieve long term economic and financial viability.		Compliance Outcome
Initial-R2020/10-1	<p>Each estate and mill within the PMU has documented management plans with the annual budget for FFB, CPO, PKO, OER and KER with projections for the next 5 years.</p> <p>A financial management system was sighted to monitor the actual performance results on a daily, monthly and annual basis. Reports by PUKIN GROUPING - PMU to the IOI management on the production performance and the OER as a measure of production efficiency were evidenced.</p> <p>Replanting programs had been implemented at the Pukin estate in year 2007 for about 629 ha. For the other estates, replanting was planned around year 2014 onwards, over a 10 year period. The annual replanting percentages ranged from 5% to 10% of the total oil palm areas.</p>	Complied

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

Criterion 4.1 Operating procedures are appropriately documented and consistently implemented and monitored.		Compliance Outcome
Initial-R2020/10-1	<p>Standard Operating Procedures (SOP) for the estates and the mill were documented. Monitoring records were available such as store requisitions, store issuances of agro-chemicals, daily and weekly task completion were properly maintained and their implementation was noted to be consistent.</p> <p>It was noted that rat baiting would only be carried out when rat attacks are more that 5% based on quality checks on the FFB crop.</p>	Complied
Criterion 4.2 Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.		Compliance Outcome
Initial-R2020/10-1	<p>Annual fertilizer application program was monitored and implemented according to the fertilizer recommendations as provided by the Agronomist.</p> <p>Sampling of palm leaves for nutrient analysis was also carried out annually. Soil sampling was carried out as on 20% of the total fields each year and thus a single round of sampling were conducted on every field once in every 5 years. During field inspections, mulching with EFB noted at planted areas. There was no evidence of any open burning.</p> <p>The dosages of dry POME applied was noted to be in accordance with the recommendations of the research centre of IOI, which was based on their analytical findings on POME utilization, to maintain the nutrient status and microbiological health of the soil.</p>	Complied

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Criterion 4.3 Practices minimise and control erosion and degradation of soils.		Compliance Outcome
Initial-R2020/10-1	<p>There was no peat soil area or fragile soils within the estates.</p> <p>Inspection at sites provided evidence that soil erosion counter-measures were taken which included: Frond stacking was carried out at alternate inter-rows of oil palm planting. After each harvesting, the fronds were cut into two pieces and stacked at the alternate inter-rows without hindering the future harvesting and evacuation of the crop. Inter-row maintenance was done through selective weeding to ensure that the 'woodies' are removed and that only soft weeds are growing. Fronds were also stacked along lips of terraced areas and parallel to streams to minimize soil runoff. At the Pukin Estate, there were some hilly areas and based on the slope maps provided, about 26% of the slopes there were in excess of 8 degrees. Terrace planting was adopted at slopes which are more than 8 degrees. At slopes which were less than 8 degrees, the fronds were stacked along the contours of the slopes as part of prevention of soil erosion programme. Stop bunds were constructed within the planting terraces. Regular road and culvert maintenance was performed. Planting of 'vetiver' grass and natural riverine plants was observed to minimize stream and river bank erosion and to restore riparian areas and buffer zones demarcated.</p> <p>However, it was noted at the Pukin estate (i.e. at PR10A), that leguminous cover has not been established at certain sections of the immature area, which should be established when the ground condition was ready.</p>	See OBS # 5
Criterion 4.4 Practices maintain the quality and availability of surface and ground water.		Compliance Outcome
Initial-R2020/10-1	<p>IOI's policy on slope protection and river buffer-zoning was available for inspection and for public viewing.</p> <p>The PMU has identified appropriate buffer zones along all natural waterways i.e. rivers and streams passing through the estates. Buffer zone demarcation was done in accordance with the Department of Irrigation & Drainage (DID) directives and no spraying or manuring activities were performed within the demarcation zones. Appropriate markings and signages were found to be placed. The estates have Environmental management plans to maintain the buffer zones. The workers were trained and informed to avoid spraying of agro-chemicals at the buffer zones.</p> <p>The POM had monitored and controlled discharges to waterways with installation of silt traps to reduce suspended solids and contaminants to meet the DOE limits. Daily checks for leakages were observed on the POME which was channeled to the Effluent Treatment Ponds (ETP) for dislodging. Water and treated POME samples were taken weekly and sent to external laboratories for analysis.</p> <p>Estate river water analysis was carried out at every 6 months interval. For the adjacent river that supplies to the mill, it was done on a 3 months interval. Rainfall data was maintained daily and annual rainfall recorded range from 3500mm to 5000mm. Water Management Plans were available and monitoring done on the water usage at the mills. On average, the water usage at the mill was about 1.3 tonne / tonne FFB processed and efforts being made to gradually reduce the usage. The monitoring of the effluent quality at the POM was noted to be done with monthly analysis results submitted by an independent laboratory. The results were noted to be within the specifications and limits permitted.</p> <p>The water management plan done in October 2010 was approved and authorized by the senior management personnel of the grouping. The raw water intake(s) points used for treating water for human consumption in the estates, except Segamat</p>	

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	<p>Estate (which was using the state government water), had not been adequately secured and not adequately tested, based on the Ministry of Health (MOH), Malaysia's requirements or any other equivalent requirements. The noncompliance issued were as follows:</p> <ul style="list-style-type: none"> • Raw water intake points at Pukin POM's pump house noted to be unsecured and lack of SOP on the safety and health precautions including appropriate signage(s). • Tube well's water used for human consumption located at Shahzan 1 estate noted to be potentially exposed to pesticide spraying and raw water samples from the tube well must be tested periodically for pesticide based on MOH or equivalent requirements. The tube well area not secured and warning signage(s) / safety & health precautions were not available / displayed during audit time. 	<p>See NCR # 3</p> <p>See NCR # 4</p>
<p>Criterion 4.5 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>		<p>Compliance Outcome</p>
<p>Initial-R2020/10-1</p>	<p>PUKIN GROUPING-PMU had adopted the IOI group policy and Internal Environmental Management & Monitoring Plan on IPM system which was made available.</p> <p>Inspection at site observed the following: Parasitoid host and beneficial predator plants such as <i>Tunera subulata</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> had been planted at some stretches along the access roads within the estates. Monitoring and records of areas where pesticides were being used and the usage per hectare basis were maintained. There was evidence of studies and monitoring done by the IOI-operating units on the IPM system adopted by them such as the detection of pest infestation as per the FAO guidelines and census taking.</p> <p>Barn owls were used as part of natural control for rats and barn owl boxes were erected. However, it was observed that the number of barn owl boxes in the estates was below the target set by the company (i.e. 1 box to 15 hectare). The level required should be reviewed and be set in accordance with the monitoring done on the rat bait dosages at the estates and severity of the situation.</p>	<p>See OBS # 1</p>
<p>Criterion 4.6 Agrochemicals are used in a way that does not endanger health or the environment. There is no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. Where agrochemicals are used that are categorised as World Health Organization Type 1A or 1B, or are listed by the Stockholm or Rotterdam Conventions, growers are actively seeking to identify alternatives, and this is documented.</p>		<p>Compliance Outcome</p>
<p>Initial-R2020/10-1</p>	<p>The estates have procedures for the use of agrochemicals for pest control which stipulated the use of only pesticides officially registered under Section 53A of the Pesticide Act (1974); and in accordance with OSH (USECHH) Regulations (2000). Pesticides storage was noted to be in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Chemical Health and Risk Assessment (CHRA) recommendations.</p> <p>Inspection at sites observed that pesticides were kept under lock and key. Empty containers disposed off in accordance with the DOE requirements. Information regarding the chemicals and their usage, hazard and general names were displayed in the National Language (i.e. Bahasa Malaysia) and translated for the understanding of the foreign workers.</p>	



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	<p>The annual medical checkup carried out for pesticides operators were not adequate at the estates.(see NCR # 1)</p> <p>No pregnant or breastfeeding women were assigned to work with pesticides. Paraquat usage is minimum and restricted to use as a catalyst with other approved herbicides as part of weed management e.g. every two spray round of paraquat is followed by one of Glyphosate. The paraquat was used to clear weeds around young palms as it only desiccates weed shoots and has no residual effect in the soil. This program was used to keep a controlled presence of soft weeds and the removal of noxious weeds. IOI's management had issued a directive in September 2010 for all its estates to phase out the use of paraquat by 31st December 2011.</p> <p>However, as there was no 'Fuller's earth' available in all the clinics at the estates and no alternative was prepared in case of an emergency, an observation was issued. We were given to understand that that all the medical assistants' in-charge of the clinics was knowledgeable on how to prepare instant antidotes from the clays available from the surroundings of the estates.</p> <p>No aerial application of agrochemicals had been carried out. There was no testing of chemical residues in CPO as there were no requests made from the buyers. Daily records of pesticides usage were maintained.</p>	<p style="text-align: right;">See OBS # 2</p>
<p>Criterion 4.7 An occupational health and safety plan is documented effectively communicated and implemented.</p>	<p>health and safety plan is documented effectively communicated and</p>	<p>Compliance Outcome</p>
<p>Initial-R2020/10-1</p>	<p>The Occupational Safety and Health (OSH) Policy were displayed at the POM and all the estates. The Occupational Safety and Health (OSH) Plan established have included the establishment of escape routes and locations of the firefighting equipment at the sites covered. Each estate and mill had identified and assessed their respective hazards and risks as per established procedures. Actions and precautions established to address the identified risks.</p> <p>All operations where health and safety is an issue have been assessed and procedures and actions are documented and implemented to address the identified issues. Each procedure was supported with documented tasks and task elements and all possible risks assessed. All precautions attached to products are observed and applied to the workers.</p> <p>The training records had indicated that workers involved in the operations have been trained in the OSH policy, programs and in safe working practices. Pesticide sprayers and fruit cutters selected at random at the estates were interviewed and they were able to demonstrate the correct safety precautions required. Adequate and appropriate PPE were available to labourers at the place of work to cover all potentially hazardous operations, such as pesticide application, chemical storage / handling, land preparation and harvesting.</p> <p>The responsible persons (i.e. mandores / field supervisors), conductors and store supervisor) were identified.</p> <p>There were records of regular meetings between the responsible person and workers where concerns of all parties about health, safety and welfare were briefed and discussed.</p> <p>Records detailing the occurrence and issues raised were properly maintained. Meeting minutes were available.</p> <p>Accident and Emergency procedures and First Aid procedures are present and instructions are clearly understood by all workers. Accident procedures are also available in Bahasa Malaysia, which is understood by the workers. Assigned</p>	<p>Complied</p>

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	<p>operatives trained in First Aid are present in both field and other operations and first aid equipment are available at worksites. Sighted a list of sites where all First Aids boxes are placed.</p> <p>Records of accidents are kept and reviewed monthly. Fire Drills had been conducted at each site (Mill and Estates) with records observed in response to potential emergency.</p> <p>All workers (including the Indonesian foreign workers) were covered by the worker's compensation scheme. Calculation on Lost Time Accident was maintained. Workplaces, machinery, equipment, transportation vehicles were maintained to ensure safety and without undue risk to health. Chemical, physical and biological substances and agents were stored under controlled conditions. A safe and healthy working environment was provided for the workers regardless of whether they are estate full time employees or contract workers.</p> <p>Good Agriculture Practice (GAP) and Chemical Health Risk Assessment (CHRA) were among the references used in maintaining the safe working environment for the employees.</p> <p>Field inspection at Pukin estate (i.e. PM 06A) observed circle spraying with Supreshade 41 (Glyphosate) + 2.4-D Amine (herbicide) and workers wearing appropriate PPE. Signboards indicated spraying of herbicides in progress and the harvesting supervisor (mandore) also carried the First Aid Box during supervision at the field.</p>	
<p>Criterion 4.8 All staff, workers, smallholders and contractors are appropriately trained.</p>		<p>Compliance Outcome</p>
<p>Initial-R2020/10-1</p>	<p>The training schedule for the year 2009/2010 for POM and respective estates was available. Relevant topics are identified and training classes were conducted for the staff and workers and evidenced in the training records. There are no smallholders or contractors at the PMU.</p> <p>Safety matters are briefed at the morning muster and 'on-the job' training is given. Records of training for the employees including the Estate Hospital Assistant (EHA) were maintained. Workers are given specific and relevant training before fieldwork. Continuous assessment and reactive training are also given in accordance with documented procedures and in compliance with the requirement of RSPO principles and criteria.</p>	<p>Complied</p>

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

<p>Criterion 5.1 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 continuous improvement.</p>		<p>Compliance Outcome</p>
<p>Initial-R2020/10-1</p>	<p>Documented Environmental Impact Assessment, Management Actions Plans and Continuous Improvement Plans dated October 2010 were prepared for the respective estates under PUKIN GROUPING-PMU by the IOI Sustainability Team which is from IOI Research Centre at Batang Melaka, Negeri Sembilan, Malaysia. The findings of the assessment had included the identification of impacts that requires changes in current practices. The report also includes action plans and recommendations in order to mitigate negative effects and promote positive ones. A generic timetable / monitoring frequency were developed and noted.</p> <p>Environmental impact assessment covered activities such as POM, oil palm fields, open areas, patches of hill forest and forest edges / boundary to forest land areas</p>	<p>Complied</p>



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	<p>were targeted by the assessment team in this study. Management action plans addressing issues raised which was monitored and projected to be reviewed annually. During the assessment, it was noted that internal EIA report had included the stakeholder consultation with external stakeholders i.e. the Land Department / Office, DOE etc. Interviews signed by respective officers were also available as part of document evidence of internal EIA.</p>	
<p>Criterion 5.2 The status of rare, threatened or endangered species and 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 their conservation taken into account in management plans and operations.</p>		<p>Compliance Outcome</p>
<p>Initial-R2020/10-1</p>	<p>The HCV assessment report(s) have indicated that there were no ERT / protected species at the external HCVs (forest land) at the areas covered by PUKIN GROUPING-PMU estates. The collated information has included the planted area itself and relevant forest land boundary considerations such as the boundary of the Forest Land adjacent to the Pukin estate, Shahzan 1 & 2 estates.</p> <p>However a minor CAR issued at the Shahzan 1&2 Estates for not identifying and considering the three ponds and a Chinese (Taoist) shrine for their potential HCV status in their assessment report prepared on 1st October 2010.</p> <p>The HCV assessment reports can be enhanced by having more photographs of species identified during the assessments performed. The HCV report dated 1st October 2010 should also identify as many common species i.e. mammals, birds and fishes found in the estate(s) environment e.g. egrets, herons and long tail macaque. Cooperation with the forestry/Land department to gather information on the animal species near the forest land boundaries. Knowledge of species i.e. ERT at the boundaries with Forest Land could significantly affect conservation status (e.g. IUCN status) then that was noted in the report.</p> <p>HCV biodiversity areas / forests type 6 e.g. church, temples, shrines, surau / mosques, cemetery etc has been appropriately identified for PUKIN GROUPING-PMU estates and mill based on the assessment report dated 1st October 2010. However, the HCV(s) actual boundaries, dimensions / hectarage and the latitude & longitude (where not determined yet) could be further defined for future reference.</p> <p>Generally the HCV assessment team has indicated more clearly the information gathering process on HCV habitats (including ERT(s) or otherwise) and the stakeholder(s) consultations done with relevant government departments, research institutes, interested NGOs and any additional field survey work to be done in the future will be based on the current findings dated 1st October 2010.</p> <p>There were isolated reported case(s) of incursion by wild boars. However no major damage to property and plantation was reported. No other incursions i.e. elephants reported ever since the implementation of RSPO for the PUKIN GROUPING-PMU estates.</p> <p>Legal requirements relating to the protection of the species or habitat were met such as reporting the matter to the authorities such as reports made to the local Land Department.</p> <p>The relevant estate(s) management has undertaken appropriate measures to control any illegal or inappropriate hunting, fishing or collecting activities within PUKIN GROUPING-PMU. IOI has "no hunting" policy and appropriate signage were prominently displayed to convey this policy especially at the forest land boundary areas.</p>	<p>See NCR # 5</p> <p>See OBS # 6</p> <p>See OBS # 7 and also NCR # 5</p>

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Criterion 5.3 Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.		Compliance Outcome
Initial-R2020/10-1	<p>The documented identification of all the waste products such as scheduled waste and sources of pollution such as from POME were appropriately implemented at PUKIN GROUPING-PMU. The PMU has segregated its wastes as general wastes and scheduled wastes. Proper areas were identified for the storage of the respective wastes.</p> <p>Scheduled Waste such as 'spent hydraulic oil' (SW 305) were properly stored and labeled with secondary containment noted at the major scheduled waste storage areas. The schedule waste storage area had restricted access to authorized personnel only. Seventh Schedule information generally available and adhered to at PUKIN GROUPING-PMU.</p> <p>Recycling bins of three different color codes were available in the POM, workers quarters/ line site(s) and estates and were used for solid waste segregation and recycling.</p> <p>The solid waste management at the dumpsite / 'landfill' has signage i.e. on Health, Safety and Environment rules that are required at the current designated landfill/dumpsite(s).</p>	Complied
Criterion 5.4 Efficiency of energy use and use of renewable energy is maximised.		Compliance Outcome
Initial-R2020/10-1	<p>The use of energy in palm oil mill 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 shell were used as fuel. Diesel generators were on standby basis to support the operation in the event of boiler / steam turbine system breakdown. Monthly records of KW usage of non-renewable and renewable fuel per metric tonne of palm product were available.</p>	Complied
Criterion 5.5 Use of fire for waste disposal and for preparing land for replanting is avoided except in specific situations, as identified in the ASEAN guidelines or other regional best practice.		Compliance Outcome
Initial-R2020/10-1	<p>PUKIN GROUPING-PMU had observed the IOI group policy of 'Zero open burning' in the estates. Inspections at site confirmed no evidence of open burning. No burning of waste including domestic waste was noted.</p>	Complied
Criterion 5.6 Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.		Compliance Outcome
Initial-R2020/10-1	<p>Environmental impact assessment performed to identify potential pollution to water, gaseous emissions to air and contamination on land.</p> <p>Management Action Plans and Continuous Improvement Plans were developed to mitigate significant impacts identified. These exercises were reviewed periodically (annually) such as next review scheduled in April 2011.</p>	Complied



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Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and mills

Criterion 6.1	Aspects of plantation and mill management, including replanting, that have social impacts 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 continuous improvement.	Compliance Outcome
Initial-R2020/10-1	<p>Under the PUKIN GROUPING-PMU, the respective Social Impact Assessment reports and Management plans at all the estates and mill was specific and individually documented by the Sustainability Team of IOI e.g. Social Impact Assessment and Management Action Plans, Pukin Estate dated 30 July 2010 for July 2010 – June 2015, was evidenced.</p> <p>Stakeholder consultation meetings with the local communities and employees on the assessment were performed by the Estate managers with their Social Liaison Officers. Employee representation was through the Employees Consultative Council (ECC) which has representation from the different levels of workers who are elected by the workers. In all estates in IOI Pukin POM grouping an Employees Consultative Committee (ECC) was formed. Members in the ECC include representatives from manures' group, sprayers' group, harvesters' group, FFB checkers' group, general workers' group, loaders' group. In Segamat Estate, the National Union of Plantation Workers (NUPW) representative was also involved.</p> <p>In all estates a dedicated Gender Committee was formed to deal with gender related issues. Members in the committees consist of all women staff and workers in the estates. Participation from their official representatives expressed their views freely with records of meeting attendance and minutes of meeting being available. Stakeholder consultations were conducted in all estates and the results of the consultation are incorporated into the SIA. Actions had been taken to address the issues raised during the consultations e.g. plans have been developed to install a water tank on higher ground to tackle the low water pressure at Pukin Estate. In the interim water is supplied to workers' quarters using the portable water tanks. External stakeholder consultations were conducted in all estates in the IOI - Pukin PMU grouping, i.e. held between July and October 2010.</p> <p>The consultations were attended by a wide range of stakeholders including government agencies such as the Forestry Dept., local businesses and neighboring estates. At the Segamat Estate, representatives from the villages surrounding the estate were also noted to be in attendance. Records of meeting with stakeholders indicated discussions held were generally on matters pertaining to access roads and use rights, working conditions, cultural/festival activities, health facilities and other community concerns. Generally the issues raised during the consultations were acted upon such as the maintenance of the football field located within the boundary of Segamat Estate, for the recreational use of the neighboring villagers'. A time table of activities identified was sighted with time frame on implementation plans. Site inspection carried out confirmed that the implementations were in progress.</p>	Complied

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Criterion 6.2 There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.		Compliance Outcome
Initial-R2020/10-1	IOI Pukin POM grouping has adopted open and transparent methods of communication and consultation when dealing with relevant parties, e.g. its workers, government agencies, contractors, neighboring plantations by personal invitation to attend the internal and external stakeholder's consultation meetings such as the issue of discontentment among workers in August 2010 on payment rates for FFB in the Shahzan 1 estate was discussed between the estate management and workers representatives which were resolved with a revision made to payment rates. List of stakeholders are updated and records of meeting were maintained.	Complied
Criterion 6.3 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all parties.		Compliance Outcome
Initial-R2020/10-1	All estates in IOI Pukin POM grouping have established complaints and grievances procedures which were adequately implemented. Complaints and Grievances logbook were sighted in all estates in the grouping. Alternatively complaints and grievances were also filed through their respective ECC representatives. The response time the complaints and grievances which were filed were found to be prompt i.e. within 5 days depending on the nature of the complaints.	Complied
Criterion 6.4 Any negotiations concerning compensation for loss of legal or customary 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.		Compliance Outcome
Initial-R2020/10-1	There were no borders at estates in Pukin grouping which were adjacent to any villages or native land. Therefore there have been no records of any negotiation or compensation pertaining to this criterion.	Complied
Criterion 6.5 Pay and conditions for employees and for employees of contractors always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.		Compliance Outcome
Initial-R2020/10-1	Basic daily rate for all employees in IOI Pukin POM grouping estates has met the industry minimum standards with an extra pay for statutory fringe benefits for their employees and the employees of sub-contractors. The estate managements also provide free housing and treated water supply, fix electricity rate per month, medical facilities, community halls, mosques and welfare amenities which help in providing sufficient and decent living for the staff and workers. However the workers' contract / job offer letter i.e. 'Surat Tawaran Bekerja Sebagai Pekerja Ladang', used in all the estates in the grouping did not reflect the current practice adopted by the grouping. Some paragraphs required revisions in the contract such as the 'removal of levy deduction from foreign workers' pay, 'basic daily wage rate' and the 'authorized personnel' signing the contract. There was a revised standard workers' contract in 2008 at the Pukin POM which had not been consistently used.	See NCR # 2

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Criterion 6.6 The employer respects the right 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.		Compliance Outcome
Initial-R2020/10-1	<p>The published statements of policy which recognizes the employee's freedom of association, was noted to be available in a few native languages including Bahasa Malaysia, English and some local native languages.</p> <p>Due to the restrictions stated in Immigration Act 1959/63, in which foreign employees are not allowed to form or be affiliated to any society or association, the estate management had formed the ECC as an alternative mechanism to cater to the collective bargaining needs of the workers.</p> <p>Results of ECC meetings were minute and available.</p>	Complied
Criterion 6.7 <ul style="list-style-type: none"> • Children are not employed or exploited. • Work by children is acceptable on family farms, under adult supervision, and when not interfering with education programmes. • Children are not exposed to hazardous working conditions. 		Compliance Outcome
Initial-R2020/10-1	<p>There was no evidence of any child labor being used at the estates of IOI Pukin POM grouping.</p> <p>Child Labour policy adopted by estate managements on 20th August 2008 stated that the minimum age of workers is 19 years and site inspection of the employment records in all estates confirmed that this has been complied.</p>	Complied
Criterion 6.8 Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.		Compliance Outcome
Initial-R2020/10-1	<p>An Equal Job Opportunity Policy was adopted by the estate management was displayed in the places where workers usually gather such as the estate administration offices, community halls, crèche, health clinics and housing blocks.</p> <p>Payment slips were also inspected in all estates in order to ensure no discrimination in daily rate between workers, unfair deduction of wages and proper wage payment for work done during the rest days as reflected in the payment slips issued.</p> <p>There was no negative feedback on any form of discrimination from the private interviews conducted with the interviewees or from the payment slips inspected.</p>	Complied
Criterion 6.9 A policy to prevent sexual harassment and all other forms of violence against women and to protect their reproductive rights is developed and applied.		Compliance Outcome
Initial-R2020/10-1	<p>Estate managements of IOI Pukin POM grouping have adopted a Sexual Harassment Policy and sexual harassment reporting procedures for protection of their workers. In all estates gender representatives were appointed to record reports from complainants appropriate to their gender. Training on sexual harassment has been held for the female staff and workers. The women workers interviewed were able to give explanations and examples on sexual harassment.</p> <p>However, there was no record of training provided for the male workers on sexual harassment at all the estates.</p> <p>It was also noted that sexual harassment reports may not have been treated with proper confidentiality e.g. at Shahzan 2 estate, a sexual harassment</p>	See OBS # 4

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	<p>report recorded in the Complaints and Grievances logbook dated 28 April 2009 was accessible for viewing by all staff.</p> <p>A procedure is in place to conduct medical check-up by the Health Assistant on women workers, depending on the type of job they are assigned to, e.g. for sprayers once a month, and manures / store keepers once in three months. Once a year the women workers were to be sent for thorough health surveillance as part of the CHRA requirements.</p> <p>Pregnant and breastfeeding women were exempted from work associated with potentially hazardous chemicals and were given light duties such as work in and around the office.</p>	<p>See OBS # 3</p> <p>(Refer also to NCR # 1)</p>
<p>Criterion 6.10 Growers and mills deal fairly and transparently with smallholders and other local businesses.</p>		<p>Compliance Outcome</p>
<p>Initial-R2020/10-1</p>	<p>The FFB supplied at Pukin Grouping-PMU were mainly from IOI directly managed land or owned estates. Supplies from smallholders / outgrower such as Manna Estate and Ladang Haji Jarun had agreements/contracts. The FOB pricing mechanisms were documented and displayed including past prices. Other services with local business were mainly for the supply of chemicals, fertilizers, equipment spare-parts, equipment maintenance services and manpower. Interviews done with the smallholders and suppliers/contractors provided generally positive feedback and general satisfaction with regards to fair prices and payments being prompt.</p>	<p>Complied</p>
<p>Criterion 6.11 Growers and millers contribute to local sustainable development wherever appropriate.</p>		<p>Compliance Outcome</p>
<p>Initial-R2020/10-1</p>	<p>The Pukin POM and the estates within the grouping were found to have contributed to the development of local communities in several ways such as organizing local sporting tournaments, donations made to local communities to conduct religious festivities, hiring local workers where available, permission for local communities to use estate facilities for religious and sports activities, free transportation for the local children to go to school, free crèche for children of local staff/workers, and providing free services to local people who require immediate medical attention at their clinics.</p>	<p>Complied</p>

Principle 7: Responsible development of new plantings

PUKIN GROUPING-PMU has a procedure for this development but has not carried out any new plantings since November 2005. Therefore no details of implementation were available for Principle 7.

Principle 8: Commitment to continuous improvement in key areas of activity

<p>Criterion 8.1 Growers and millers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations.</p>		<p>Compliance Outcome</p>
<p>Initial-R2020/10-1</p>	<p>Continuous improvements in key operations have been developed at the Pukin Grouping-PMU which were regularly monitored and reviewed as follows:</p> <ol style="list-style-type: none"> 1) Under the Integrated Pest Management (IPM) program, for pest control and reduction in the consumption of chemical pesticides. There were increasing efforts made through the use of direct bio-control methods such as the cultivation of beneficial plants. 2) Through the introduction of waste pollution and reduction programs' including the recycling of all agricultural wastes from the mill, workshops and fields. Nutrient recycling programs were improved through the use of the treated POME and EFB at the field which has resulted in the reduction of environmental 	<p>Complied</p>



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	<p>impacts and pollution.</p> <p>3) The promotion of recycling programs by providing appropriate awareness and training and availability of recycling bins with the long term plan to reduce solid wastes.</p> <p>4) Each estate has improvement programs to further restore the riparian buffer zones and non-spraying of agro-chemicals in the buffer zones.</p> <p>5) Review of social impact assessment programs and social engagements with the workers and local communities and visits to the villages (at Segamat).</p> <p>6) Annual review of performance indicators linked to the progressive implementation of both social and environmental programs and expenditure via the financial accounting system.</p>	
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3.2 Details of Identified Noncompliance and Corrective Actions, Observations and Positive Elements.

The status of Noncompliance (NCR) and Observations (OBS) identified against the MYNI Compliance Indicators is as per details below:

Year 2010: Compliance assessment, A total of **5 Noncompliances (1 Major and 4 Minor)** were identified as below:

NCR #	MYNI Indicator	Details of NCR (in year 2010)		
01 / 5 Major	2.1.1 & 4.6.5	Date issued:	Date due:	Date closed:
		12 December 2010	11 February 2011	26 January 2011
		Nonconformance:		
		<p>In year 2009 till current in December 2010, the estates within the grouping did not send all workers who were exposed to chemicals for the annual medical surveillance by the Occupational & Health Dept. e.g. at the Segamat estate, in 2009 - only 2 employees and in 2010 – only 6 employees out of a total of 43 workers were medically examined.</p>		
		Corrective Action (replied):		
		All workers needing the annual medical surveillance as per CHRA findings have been examined as per List attached.		
		Verification:		
		Documented evidence submitted was acceptable after review and was verified. Effectiveness of implementation will be followed up during the next scheduled audit.		
NCR #	MYNI Indicator	Details of NCR (in year 2010)		
02 / 5 Minor	2.1.1 & 6.5.2	Date issued:	Date due:	Date closed:
		12 December 2010	11 January 2011	5 January 2011
		Nonconformance:		
		<p>The 'Surat Tawaran Bekerja Sebagai Pekerja Ladang' did not reflect the current and actual practices of the estates within the grouping e.g. the wage rate, levy and current signatory.</p>		
		Corrective Action (replied):		
		Memo was issued by Human Resource Manager (Plantation Division) to all operation centres. Samples of updated contract and copies were attached.		
		Verification:		
		Documented evidence submitted was acceptable after review and verification.		



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NCR #	MYNI Indicator	Details of NCR (in year 2010)		
03 / 5 Minor	4.4.7	Date issued: 11 December 2010	Date due: 11 January 2011	Date closed: 5 January 2011
		Nonconformance: The Pukin Oil Mill's pump house (raw water intake point) used for human consumption / domestic purposes was not secured and was lacking in warning and safety precaution signages.		
		Corrective Action (replied): Raw water Pump House was secured and SOPs including appropriate signage(s) (photograph attached).		
		Verification: Documented evidence submitted was acceptable after review and verification.		
NCR #	MYNI Indicator	Details of NCR (in year 2010)		
04 / 5 Minor	4.4.7	Date issued: 12 December 2010	Date due: 11 January 2011	Date closed: 5 January 2011
		Nonconformance: 1) The tube well located at 0311 at Shahzan 1 estate was noted to be exposed to pesticide spraying, hence the raw water samples should be tested for Group 4 (pesticides) under Ministry of Health's (MOH) Drinking water standard 2009. 2) The tube well area is not secured. Warning and safety precaution signages should be prominently displayed.		
		Corrective Action (replied): The tube well was secured, appropriate warning signage(s) and actions taken (photograph was attached) testing of pesticide residual from the tube well's raw water sample conducted and certificate of analysis provided.		
		Verification: Documented evidence submitted was acceptable after review and verification.		
NCR #	MYNI Indicator	Details of NCR (in year 2010)		



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05 / 5 Minor	5.2.1	Date issued: 12 December 2010	Date due: 11 January 2011	Date closed: 5 January 2011
		Nonconformance:		
		1) The HCV assessment dated 1 st October 2010 for the Pukin PMU estates and Oil Mill has not included the 'Chinese Shrine' located near the Assistant Estate Manager's bungalow at block 0311, Shahzan 1 & 2 estates. 2) The aforesaid HCV assessment report has not considered the three ponds at the Shahzan 1 & 2 estates for HCV status.		
		Corrective Action (replied): The HCV assessment dated 1 st October 2010 for the Pukin PMU estates and Oil Mill revised in December 2010 have included the Chinese Shrine (Taoist Shrine) which has been assessed. Additionally, reported in the HCV status findings were the three ponds identified.		
		Verification: Documented evidence submitted was acceptable after review and verification.		

Observations / Opportunities for Improvement:

A total of 7 Observations (OBS) were identified. The progress to be made on the observations as listed below will be checked during the surveillance assessment.

OBS	MYNI Indicator	Details of NCR (in year 2010)		
01	4.5.2	Date issued: 11 December 2010	Date due: 1 st Surveillance	Date closed: -
		Observation: The number of barn owl boxes in the estates is found to be below the target set by the company (i.e. 1 box to 15 hectare). The level required be reviewed and be set in accordance with the monitoring done on the rat bait dosages at the estates and severity of the situation.		
		Follow up Verification: (During next surveillance)		
02	4.6.7	Date issued: 11 December 2010	Date due: 1 st Surveillance	Date closed:-
		Observation: There was no 'Fuller's earth' available in all the clinics at the estates and no alternative was prepared in case of an emergency.		
		Follow up Verification: (During next surveillance)		



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03	6.9	Date issued: 12 December 2010	Date due: 1 st Surveillance	Date closed: -
		Observation: A report on a sexual harassment case was not treated with proper confidentiality at the estates.		
		Follow up Verification: (During next surveillance)		
04	6.9	Date issued: 12 December 2010	Date due: 1 st Surveillance	Date closed: -
		Observation: There was no training provided for the male workers on sexual harassment at all the estates within the PMU.		
		Follow up Verification: (During next surveillance)		
05	4.3.5	Date issued: 12 December 2010	Date due: 1 st Surveillance	Date closed: -
		Observation: It was noted at the Pukin estate (i.e. at PR10A), that leguminous cover has not been established at certain sections of the immature area, which should be established when the ground condition was ready.		
		Follow up Verification: (During next surveillance)		
06	5.2	Date issued: 12 December 2010	Date due: 1 st Surveillance	Date closed: -
		Observation: The HCV assessment reports can be enhanced by having more photographs of species identified during the assessments performed. The HCV report dated 1 st October 2010 should also identify as many common species i.e. mammals, birds and fishes found in the estate(s) environment e.g. egrets, herons and long tail macaque. Cooperation with the forestry/land department can be further enhanced to gather information on the wildlife near the land boundaries. The knowledge of species particularly ERT species at the boundaries could significantly affect conservation status (e.g. IUCN status) which can be covered more in depth in the HCV reports.		
		Follow up Verification: (During next surveillance)		



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07	5.2	Date issued: 12 December 2010	Date due: 1 st Surveillance	Date closed: -
		Observation: HCV biodiversity areas / forests type 6 e.g. church, temples, shrines, surau/mosques, cemetery etc has been appropriately identified for PUKIN GROUPING-PMU estates and mill based on the assessment report dated 1 st October 2010. However, the HCV(s) actual boundaries, dimensions / hectarage and the latitude & longitude (where not fully determined yet) could be further defined for future reference.		
		Follow up Verification: (During next surveillance)		

Identified Positive Elements

1. Support provided to schools for the foreign estate workers children.
2. Proper Housing, Crèche and Medical facilities.
3. Priority given on the training and awareness on the health and safety aspects related to work for the workers.
4. Establishment of the Employees Consultative Committee (ECC) which has included gender and workers representation for solving internal disputes and making improvements.

3.3 Issues Raised by Stakeholders and Findings related to each issue

In the course of the assessment for the PUKIN GROUPING-PMU, written comments received by MICM from stakeholders such as the NGOs and Local Authorities concerning IOI had been followed up during the assessment accordingly.

The issues raised by the stakeholders were responded by IOI in a suitable manner.

Details are under **Appendix E: Stakeholders comments and IOI / PUKIN GROUPING-PMU response.**



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4.0 Assessment Conclusion and Recommendation

Moody International Certification (Malaysia) Sdn Bhd (MICM) has successfully conducted an assessment on PUKIN GROUPING-PMU operations of 1 palm oil mill and 4 oil palm estates. PUKIN GROUPING-PMU has been able to demonstrate its compliance with the RSPO Principles and Criteria (October 2007); Malaysian National Interpretation (MY-NI, November 2010) and RSPO Supply Chain Certification (November 2009) for POM

The MICM assessment team recommends that PUKIN GROUPING-PMU be approved as a producer of RSPO Certified Sustainable Palm Oil.

Signed for and on behalf of
MOODY INTERNATIONAL CERTIFICATION
(MALAYSIA) SDN BHD

Mr. Sivabalan Thavarajah
Lead Assessor

Date: 12 June 2012

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
IOI CORPORATION BERHAD

Mr. Too Heng Liew
Head of Sustainability

Date: 12 June 2012



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Appendix A: Qualifications of Lead Assessor and Assessment Team

Mr. T Sivabalan (SV) – Lead Assessor – Environmental & Legal, HCV, OSH, Social Responsibility.
– BSc (Environmental Science) (Hons), MSc (Quality Improvement & Productivity)

Mr. Augustine Loh (AL) – Assessor – Environmental & Legal, OSH.
– MBA, Dip.NS (Maritime Studies)

Mr. Jumat Majid – Assessor – Social Responsibility and Workers Welfare
– BSc (Social Science)

Mr. Chen Fai Kok (CFK) – Assessor / Technical Expert – Good Agricultural Practices and IPM
– Dip (Agriculture)

Mr. N. Retnasabapathy (NR) – Assessor / Technical Expert – Good Agricultural Practices and IPM
– BSc (Agriculture)

Mr. T Sivabalan (SV) is a Third Party Assessment (TPA) Lead auditor for ISO 9001, ISO 14001, OHSAS 18001, WRAP and RCOC. He has over 8 year's fieldwork experience in various ecosystems including plantations. He has successfully completed the IRCA accredited LAC in ISO 9001:2008, ISO 14001:2004, OHSAS 18001:2007, Requirement for Chain-of-Custody Certification (RCOC) by MTCC/ PEFC, WRAP Accredited Monitor Training and RSPO P&C MY-NI Lead Assessor course. He has performed over 500 auditing days in quality, environmental, safety & health, WRAP (accountability and social responsibility audit), product certification and RCOC assessments in various sectors including forestry authorities and forestry research centers. He was part of the RSPO Assessment team which audited several RSPO certified Plantation Management Units in 2009 -2011.

Mr. Augustine Loh (AL) 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 Programs and Integrated Management System. He has over 10 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 9001:2008, ISO 14001:2004, OHSAS 18001:2007, ISO 22000, RSPO Lead Assessor Course and International Sustainable Carbon Certification (ISCC) Lead Auditor course. He is currently the Intertek-Moody RSPO Program Manager and has performed over 500 auditing days on quality, environmental and safety & health assessments in various sectors including oil palm plantations. He was part of the RSPO Assessment team which audited several RSPO certified Plantation Management Units in 2009 - 2011.

Mr Jumat Majid (JM) has over 13 years work experience in the agriculture sector. He has successfully completed the IRCA accredited Lead Auditor course in ISO 9001:2008 and RSPO P&C MY-NI Lead Assessor course. He has also successfully completed training programs in Organic Agriculture Development and had performed organic agriculture inspections and assessments for more than 6 years. He has been involved in NGO work in the areas of social impact assessments within the South East Asia region. He was part of the RSPO Assessment team which audited a RSPO certified Plantation Management Unit in 2010.

Mr. Chen Fai Kok (CFK) 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 RSPO P&C MY-NI Lead Assessor course. He was part of the RSPO Assessment team which audited several RSPO certified Plantation Management Units in 2009 - 2011.

Mr. N. Retnasabapathy (NR) has over 25 years work experience in the plantation sector. He has held a Senior Management role in the estate field operations. He was a member of the Incorporated Society of Planters (ISP) and had implemented GAP, IPM and workers management system at various estates in Malaysia. He has successfully completed the IRCA accredited Lead Auditor course in ISO 9001:2008 and RSPO P&C MY-NI Lead Assessor course. He was part of the RSPO Assessment team which audited several RSPO certified Plantation Management Units in 2009 - 2011.

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Appendix B: Certification Assessment Programme (Actual)

Date	Time	Assessors and Assessment Activity		
		Augustine Loh (AUG) & T. Sivabalan (SV)	Chen Fai Kok (CFK) & N. Retnasabapathy (NR)	Jumat Majid (JM)
08 /12/10 Day 1	10.00 – 10.30 am	Location: Pukin Palm Oil Mill, Rompin, Pahang - Opening meeting		
	10.30 – 6.00 pm Lunch break at 12.30 – 1.30 pm	Site assessment at Pukin Oil Mill (POM) <ul style="list-style-type: none"> Documentation Review HR – Workers Training Mill Operations – Effluent Treatment & Disposal (waste management) Interviews with Staff & Workers Interviews with FFB Suppliers, Contractors Assessment on P1 to P8 at Mill <ul style="list-style-type: none"> Mill inspections & verifications receiving FFB to PO storage boiler, workshop, etc chemical store, handling, labeling 	Site assessment at Pukin Estate <ul style="list-style-type: none"> Documentation Review Field Inspections & verifications Interviews with Staff & Workers Interviews with Contractors, Government agencies, NGOs etc Housing, Clinics and Community facilities Assessment on P1 to P8 <ul style="list-style-type: none"> including GAP including IPM chemical store, handling, labeling 	Site assessment at Pukin Estate <ul style="list-style-type: none"> Documentation Review HR – Review of Pay & Conditions, Worker Contracts, Training Interviews with Staff & Workers Interviews with Contractors, Government agencies, NGOs etc Housing, Clinics and Community facilities Assessment on P6 <ul style="list-style-type: none"> including GAP chemical store, handling, labeling
	6 – 7 pm	Break		
	7 – 10 pm	Team meeting and discussion		
09 /12/10 Day 2	8.am - 12 noon	Assessment on P1 to P8 at Pukin Mill & Estate <ul style="list-style-type: none"> Mill inspections & verifications including receiving FFB to PO storage including boiler, workshop, etc including chemical store, handling, labelling 	Site assessment at Shahzan 1 & 2 Estates <ul style="list-style-type: none"> Documentation Review Field Inspections & verifications Interviews with Staff & Workers Interviews with Contractors, Government agencies, NGOs etc Housing, Clinics and Community facilities 	Site assessment at Shahzan 1 & 2 Estates <ul style="list-style-type: none"> Documentation Review Field Inspections & verifications Interviews with Staff & Workers Interviews with Contractors, Government agencies, NGOs etc Housing, Clinics and Community facilities
	12 – 1 pm	Break		
	1 – 6 pm	Assessment on P1 to P8 <ul style="list-style-type: none"> Mill & Field inspections & verifications GAP HCV (if any) – special focus chemical store, handling, labeling 	Assessment on P1 to P8 <ul style="list-style-type: none"> Field inspections & verifications GAP IPM chemical store, handling, labeling 	Assessment on P1 to P8 <ul style="list-style-type: none"> Field inspections & verifications GAP chemical store, handling, labeling



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	6 – 7 pm	Break		
	7 – 10 pm	Team discussion		
10 /12/10 Day 3	8.am - 12 noon	Site assessment at Segamat Estate <ul style="list-style-type: none"> • Documentation Review • HR – Review of Pay & Conditions, Worker Contracts, Training • Interviews with Staff & Workers 	Site assessment at Segamat Estate <ul style="list-style-type: none"> • Documentation Review • Field Inspections & verifications • Interviews with Staff & Workers • Interviews with Contractors, Government agencies, NGOs etc 	Site assessment at Segamat Estate <ul style="list-style-type: none"> • Documentation Review • Field Inspections & verifications • Interviews with Staff & Workers • Interviews with Contractors, Government agencies, NGOs etc
	12 – 1 pm	Break		
	1 – 6 pm	Assessment on P1 to P8 <ul style="list-style-type: none"> • Field inspections & verifications • including HCV (if any) – special focus • including chemical store, handling, labeling 	Assessment on P1 to P8 <ul style="list-style-type: none"> • Field inspections & verifications • including GAP • including IPM • including chemical store, handling, labeling 	Assessment on P1 to P8 <ul style="list-style-type: none"> • Housing • Clinics and Community facilities • Other Social matters
	6 – 7 pm	Break		
	7 – 10 pm	Team meeting and discussion		
11 /12/10 Day 4	8.am - 12 noon	At Pukin Estate – meeting for review of assessment findings on P1 to P8 <ul style="list-style-type: none"> • Follow up activities and verifications and interviews 	At Pukin Estate – meeting for review of assessment findings on P1 to P8 <ul style="list-style-type: none"> • Follow up activities and verifications and interviews 	At Pukin Estate – meeting for review of assessment findings on P1 to P8 <ul style="list-style-type: none"> • Follow up activities and verifications and interviews
	12 – 1 pm	Break		
	1 – 4 pm	Preparation for closing meeting		
	4 – 5 pm	Team Meeting and Discussion with IOI - PMU representatives		
	5 pm	Closing meeting		

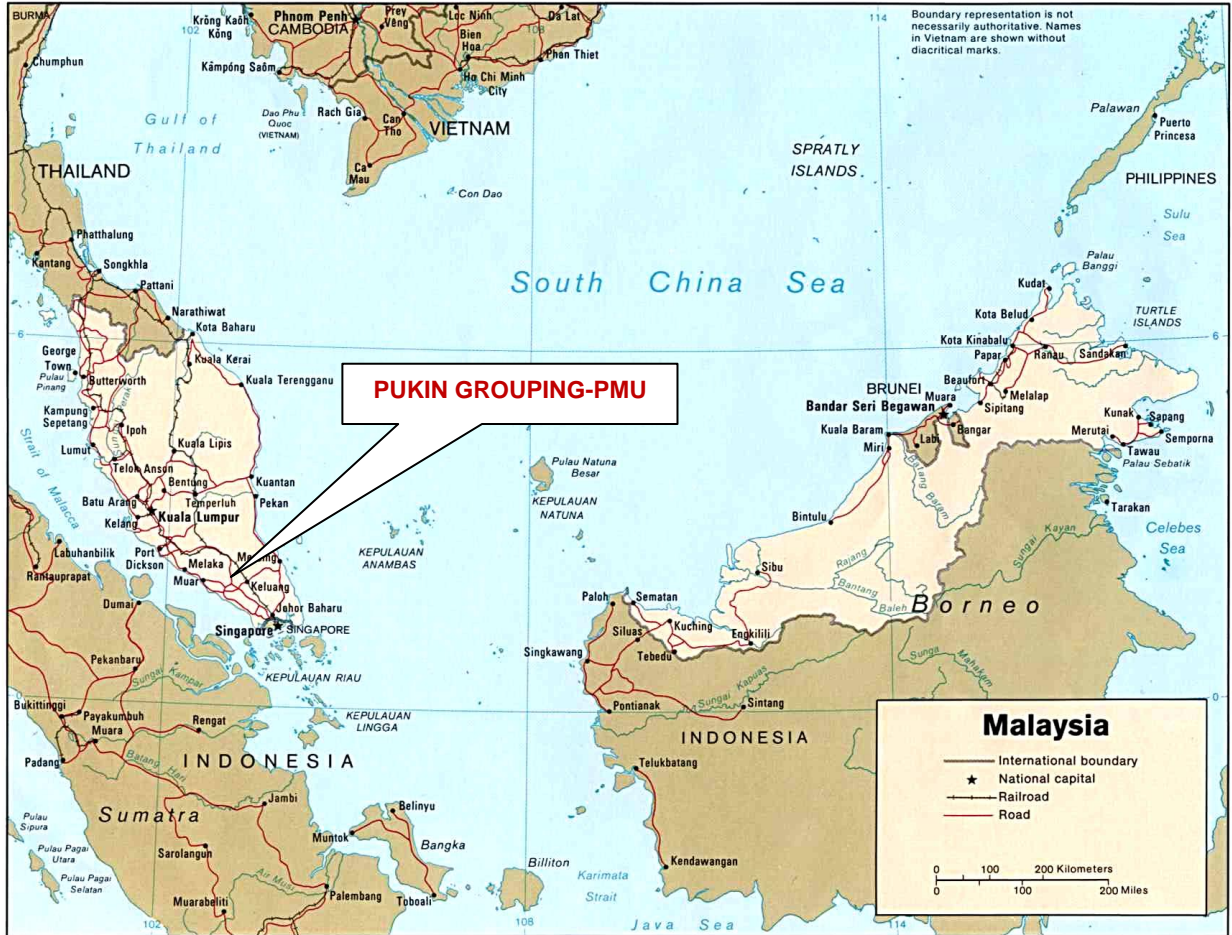
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Appendix C1: Location Map 1 of PUKIN GROUPING-PMU



Base 801410 (546184) 10-89

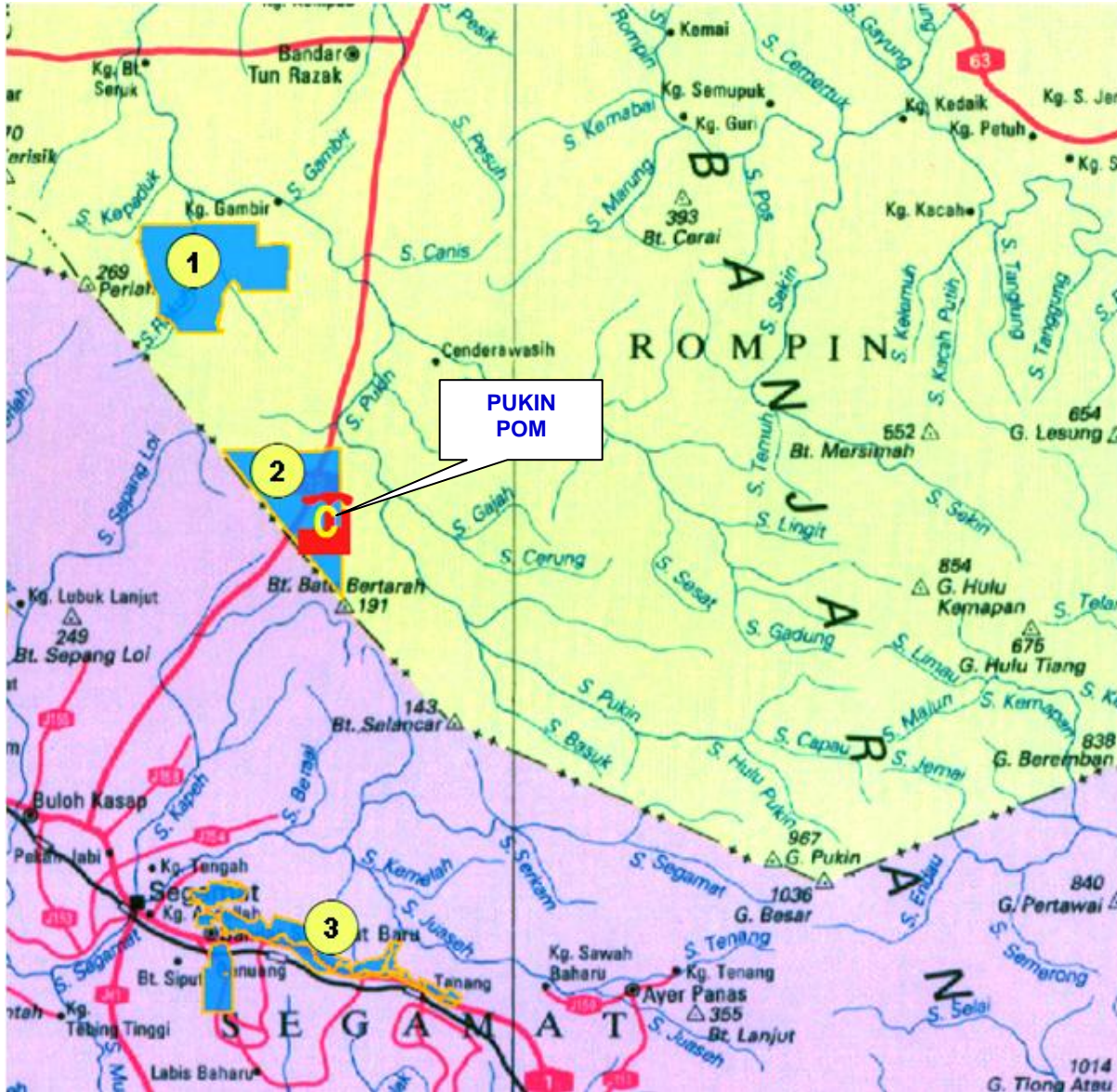
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Appendix C2: Location Map 2 of PUKIN GROUPING-PMU



Legend:

- C - Pukin Oil Mill
- 1 - Shahzan 1 & Shahzan 2 Estates
- 2 - Pukin Estate
- 3 - Segamat Estate

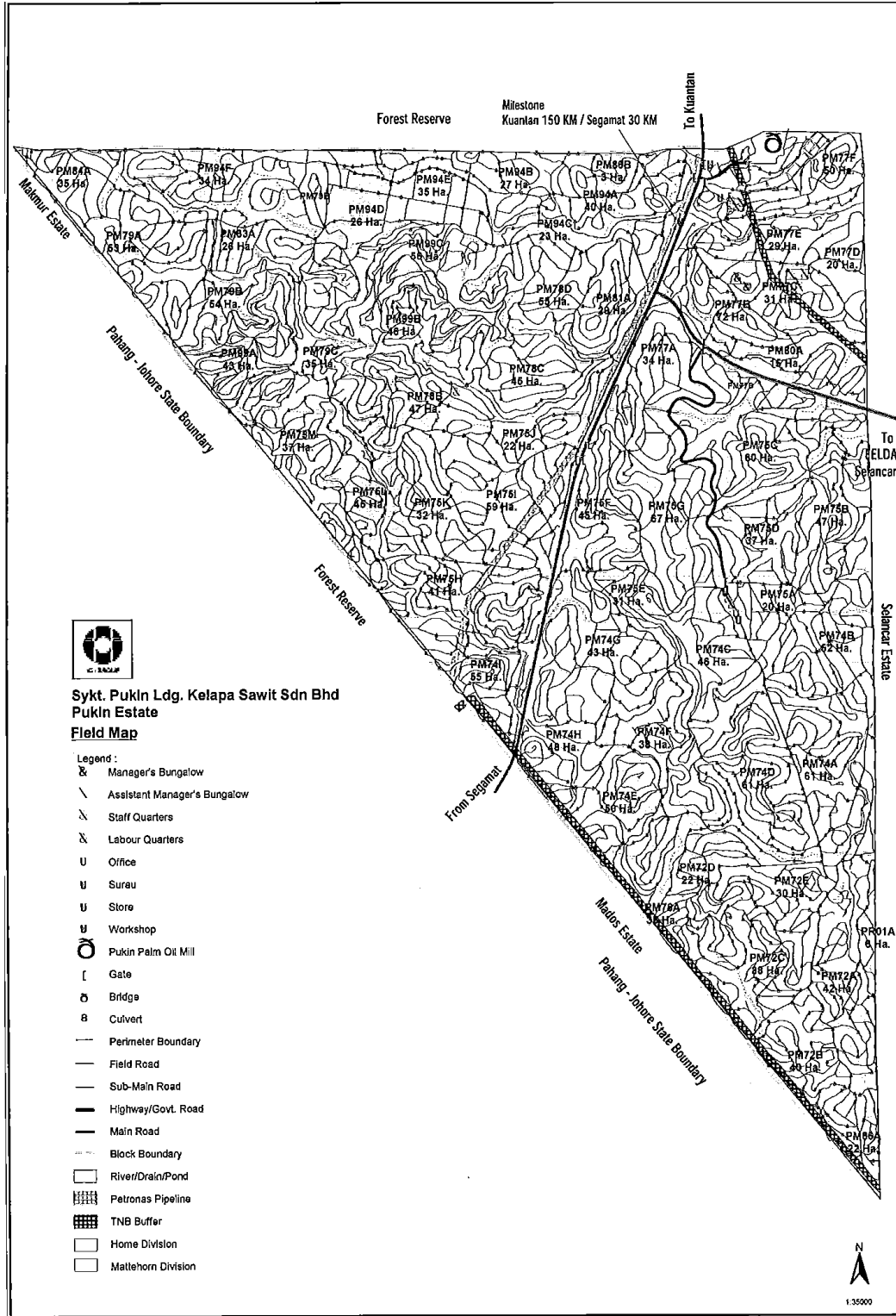
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Appendix C3: Field Map Pukin POM and Estate

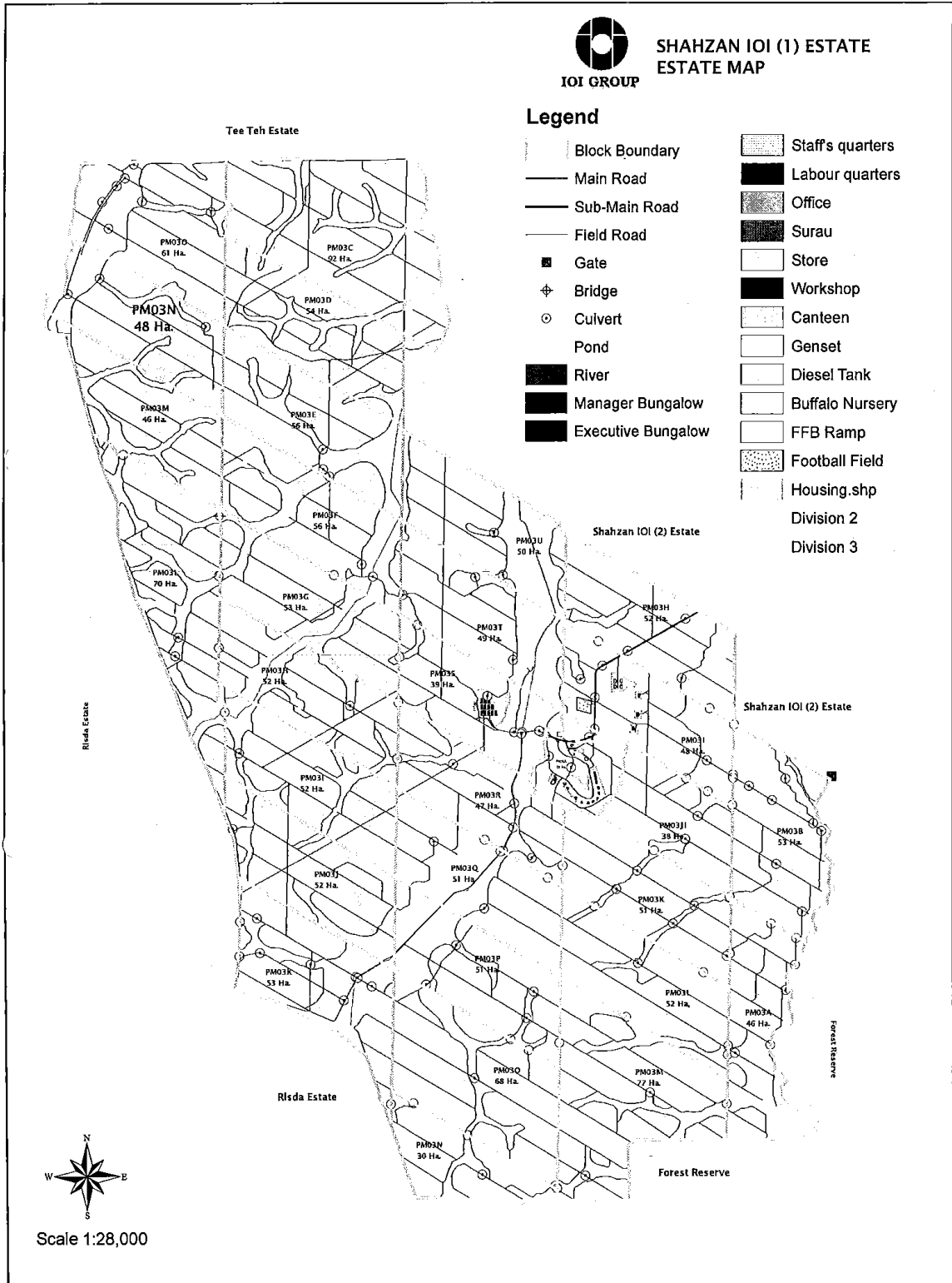


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Appendix C4: Field Map Shahzan (1) estate

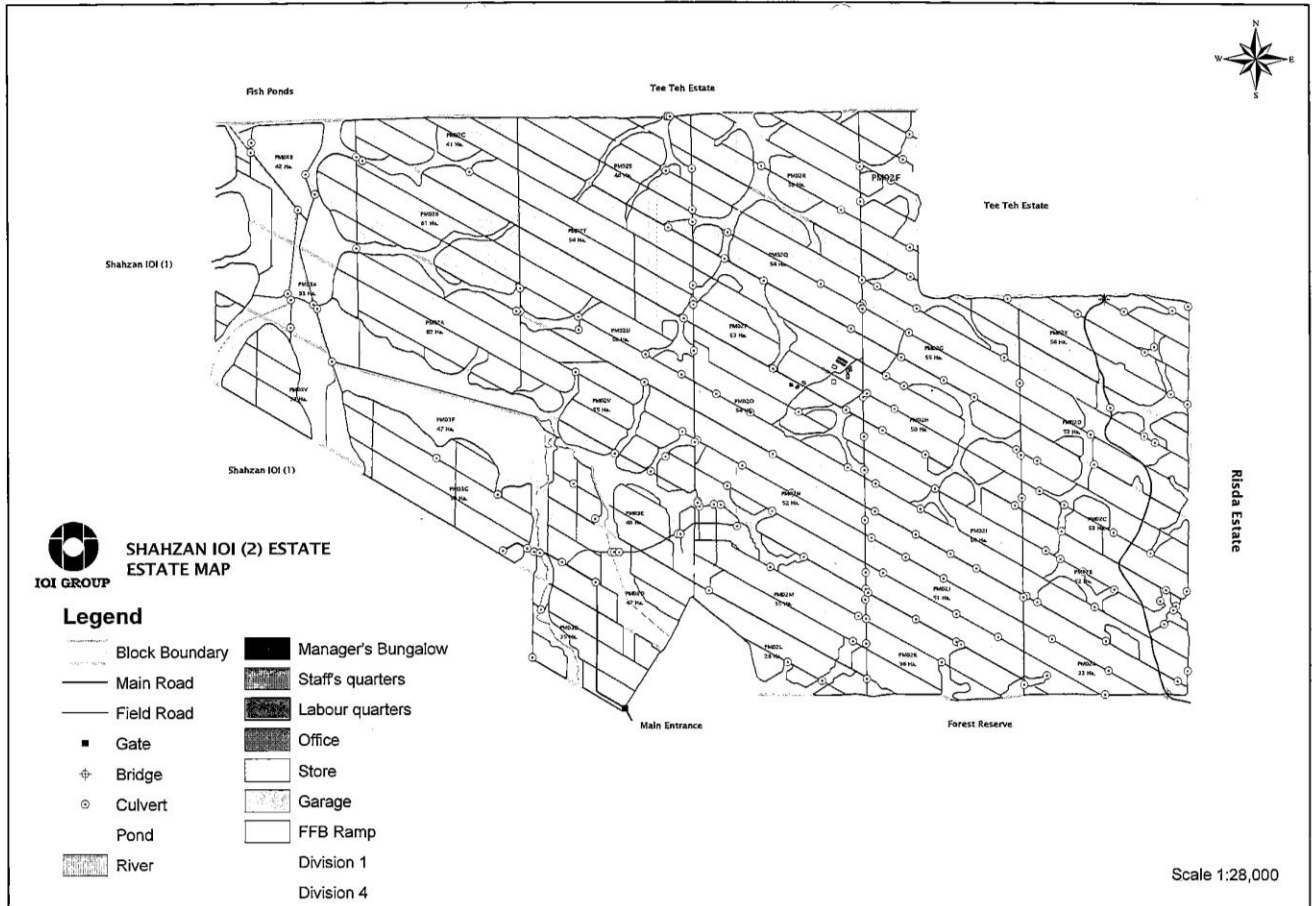


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Appendix C5: Field Map Shahzan (2) estate



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Appendix C6: Field Map Segamat estate

