

**MONG RETHYTHY 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)

Report No.: R9280/12-9 Mong Reththy Investment Cambodia Oil Palm Co. Ltd.
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ANNUAL SURVEILLANCE ASSESSMENT

PUBLIC SUMMARY REPORT

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

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

Certificate No:

Start / Issued date:

Expiry date:

RSPO 928088

15 Aug 2017

14 Aug 2022

Assessment Type

Re-Certification

Annual Surveillance Assessment (ASA-01)

Annual Surveillance Assessment (ASA-02)

Annual Surveillance Assessment (ASA-03)

Annual Surveillance Assessment (ASA-04)

Assessment Dates

19-23 Jun 2017

18-22 Jun 2018

06-10 May 2019

Intertek Certification International Sdn Bhd

D-28-3, Level 28, Menara Suezcap 1, No. 2, Jalan Kerinchi, Gerbang Kerinchi Lestari, 59200 Kuala Lumpur, Malaysia.

Tel: +00 (603) 7931 0032 Fax: +00 (603) 7931 0419 Email: ia.mysbaenquiry@intertek.com

Website: www.intertek.com

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1.0 SCOPE OF ASSESSMENT

1.1 Introduction

This Annual Surveillance Assessment was conducted on the Plantation Management Unit (PMU), Mong Reththy Cambodia Oil Palm Co. Ltd. (hereafter abbreviated as MRICOP), from **06 -10 May 2019** 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 RSPO Supply Chain Certification Standard (Jun 2017) for Palm Oil Mill.**

The plantation management unit (PMU) or management unit of MRICOP Grouping comprises of two (2) palm oil mills and a common supply base of four (4) estates. The eligibility of the Multiple Mill Certification of MRICOP Grouping was confirmed by the RSPO Secretariat on 21 Mar 2015.

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

MRICOP Grouping comprises of two (2) palm oil mills; viz;(a) Monorum POM and (b) Anlong Kropeu POM and four (4) estates as indicated in Table 1 below, which includes the addresses and GPS locations of the mill and estates. 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° 54' 33.7" N	103° 50' 04.2" 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° 57' 52.1" N	103° 54' 26.2" E
Estate A (Tapoa)	National Road 4, Sangkat Cheung Kor, Khan Prey Nop, Preah Sihanouk Province, Kingdom of Cambodia.	10° 48' 59.7" N	103° 47' 46.9" E
Estate B (Svay)	National Road 4, Sangkat Cheung Kor, Khan Prey Nop, Preah Sihanouk Province, Kingdom of Cambodia.	10° 52' 08.2" N	103° 51' 19.2" E
Estate C (Anlong Kropeu)	National Road 4, Sangkat Cheung Kor, Khan Prey Nop, Preah Sihanouk Province, Kingdom of Cambodia.	10° 57' 58.7" N	103° 54' 02.0" E
Estate D (Kirivon)	National Road 4, Kirivon, Stoeng Chhay, Prey Nop, Preah Sihanouk Province, Cambodia.	10° 57' 58.4" N	103° 54' 01.9" E

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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 4 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 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 surveillance assessment ASA-02 (last cycle) 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 large Estate C was subsequently divided into two estates, viz; a smaller Estate C and a new Estate D (Kirivon) and this change was found to be in compliance during the surveillance assessment ASA-04 (last cycle).

The supply base i.e. FFB sources to the POM PMU are from the abovementioned 4 estates only. Verification done on site during this Assessment confirmed that there were no outgrowers / 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) – Year 2018		Area Summary (ha) – Year 2019	
	Certified (Titled) Area	Planted Area	Certified (Titled) Area	Planted Area
Estate A (Tapoa)	4,956.70	4,073.68	4,956.70	4,073.68
Estate B (Svay)	5,153.41	4,333.07	5,153.41	4,333.07
Estate C (Anlong Kropeu)	5,339.70	4,252.36	5,339.70	4,252.36
Estate D (Kirivon)	5,130.39	3,896.50	5,130.39	3,931.26
Total:	20,580.20	16,555.61	20,580.20	16,590.37

Notes:

1. This Assessment covered the overall land use for oil palm plantation areas, and the identified Conservation areas including HCV areas marked out at the estates.
2. All the 4 estates were assessed with emphasis 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.
3. The slight increase of 34.76 ha in planted area for Estate D in year 2019 over the previous year is due to the infilling with new oil palms from Jul 2017- Dec 2018 and planted area re-adjustment for year 2019.

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1.4 Year of Plantings and Cycle

The 4 estates have been developed beginning from 1997 and are still in the 1st cycle of planting. The age profile is as shown in Table 3.

Table 3: Age Profile of Planted Oil Palm - Year 2019

	Estate Name	Year of Planting	Cycle of Planting	Mature OP (ha) – Above 3 years	Immature OP (ha) – 3 years & below	Total (ha) - Planted
1	Estate A (Tapoa)	1997-2008, 2010	1 st	4,073.68	0.00	4,073.68
			S-total	4,073.68	0.00	4,073.68
2	Estate B (Svay)	1997-2012, 2016	1 st	4,295.95	37.12	4,333.07
			S-total	4,295.95	37.12	4,333.07
3	Estate C (Anlong Kropeu)	2008-2010, 2011-2012, 2014-2016	1 st	4,232.16	20.20	4,252.36
			S-total	4,232.16	20.20	4,252.36
4	Estate D (Krivon)	2010-2013, 2014-2018	1 st	3,858.08	73.18	3,931.26
			S-total	3,858.08	73.18	3,931.26
			G-Total	16,459.87	130.50	16,590.37

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)	Hectarage – Ha (Year: 2018)	Hectarage – Ha (Year: 2019)
1	Oil Palm - Planted Area (ha)	16,555.61	16,590.37
	OP Mature (Production)	16,165.00	16,459.87
	OP Immature (Non-Production)	390.61	130.50
	OP Planted on Peat (see note1)	0.00	0.00
	Other crop such as Rubber etc.	0.00	0.00
2	Conservation Area (ha)	3,164.60	3,164.60
	Conservation (forested)	0.00	0.00
	Conservation (non-forested)	3,164.60	3,164.60
3	HCV Area (ha)	2.45	2.45
	Areas as defined under HCVF Toolkit for HCV 1- 6	2.45	2.45

Notes:

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- Significant portions of the concession land were 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 located at 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 currently 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. Sunchai Choongan
Designation: Deputy Managing Director – MRICOP / MTSI
Full Address: Mong Reththy Investment Cambodia Oil Palm Co. Ltd
#52, St. 598 Sangkat Boeung Kak II, Khan Toul Kork, Phnom Penh, Cambodia.
Tel: (855-85) 903 551
Email: sunchaic@bjc.co.th

Name: Mr. Lay Rithy
Designation: RSPO Division Manager – MRICOP / MTSI
Full Address: Mong Reththy Investment Cambodia Oil Palm Co. Ltd
#52, St. 598 Sangkat Boeung Kak II, Khan Toul Kork, Phnom Penh, Cambodia.
Tel: H/P: +855 16 540 413, +855 17 758 329
Email: rithy.l@micop.com.kh

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1.8 Tonnages Verified for Certification

1.8.1 The breakdown of all the tonnages of FFB from the supplying estates to the 2 POMs respectively based on the 12 months certificate license period are as follows:

Table 5A: Total FFB tonnages for Monorum Mill (Sept 2017– Aug 2018)

#	Estate	FFB Processed (MT)	Main Processing Palm Oil Mill (POM)	Certification CB
1	Estate A (Tapoa)	28,036.83	Monorum POM	Intertek
2	Estate B (Svay)	21,679.13	Monorum POM	Intertek
3	Estate C (Anlong Kropeu)	5,386.52	Monorum POM	Intertek
4	Estate D (Kirivon)	2,082.21	Monorum POM	Intertek
	Total:	57,184.69		

Table 5B: Total FFB tonnages for Anlong Kropeu Mill (Sept 2017– Aug 2018)

#	Estate	FFB Processed (MT)	Main Processing Palm Oil Mill (POM)	Certification CB
1	Estate A (Tapoa)	47,505.52	Anlong Kropeu POM	Intertek
2	Estate B (Svay)	49,545.39	Anlong Kropeu POM	Intertek
3	Estate C (Anlong Kropeu)	57,020.37	Anlong Kropeu POM	Intertek
4	Estate D (Kirivon)	32,500.95	Anlong Kropeu POM	Intertek
	Total:	186,572.23		

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

Table 6: Annual Tonnages of FFB

Estate / Supplier	FFB Processed in Sept 2017- Aug 2018 - Actual		FFB Processed in Sept 2018 - Aug 2019 - Actual + Projected		FFB for processing from Sept 2019 – Aug 2020 Projected	
	MT	%	MT	%	MT	%
Estates A, B, C & D to Monorum POM - Certified	57,184.69	23.46	71,600	36.00	55,000	18.65
Estates A, B, C & D to Anlong Kropeu POM - Certified	186,572.23	76.54	203,800	74.00	240,000	81.35
Other External Supplier – Uncertified	0	0	0	0	0	0
Total	243,756.92	100	275,400	100	295.000	100
SCCS Module for POM	IP		IP		IP	

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

Table 7A: Annual Certified Tonnages – FFB, CPO & PK (POM 1: Monorum Mill)

POM	FFB Processed in Sept 2017- Aug 2018 - Actual		FFB Processed in Sept 2018 - Aug 2019 - Actual + Projected		FFB for processing from Sept 2019 – Aug 2020 Projected	
Total Certified FFB Processed (MT)	57,184.69		71,600		55,000	
Total Certified CPO Production (MT)	10,913.40	OER: 19.08%	14,106	OER: 19.70%	10,385	OER: 19.70%
Total Certified PK Production (MT)	2,287.13	KER: 4.00%	3,365	KER: 4.70%	2,585	KER: 4.70%

Table 7B: Annual Certified Tonnages – FFB, CPO & PK (POM 2: Anlong Kropeu Mill)

POM	FFB Processed in Sept 2017- Aug 2018 - Actual		FFB Processed in Sept 2018 - Aug 2019 - Actual + Projected		FFB for processing from Sept 2019 – Aug 2020 Projected	
Total Certified FFB Processed (MT)	186,572.23		203,800		240,000	
Total Certified CPO Production (MT)	37,111.59	OER: 19.89%	40,145	OER: 19.70%	47,280	OER: 19.70%
Total Certified PK Production (MT)	8,346.16	KER: 4.47%	9,578	KER: 4.70%	11,280	KER: 4.70%

1.9 Time Bound Plan and Multiple Management Units

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

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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 **2 April 2019**, 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.

The Assessment team conducted the current assessment on **6-10 May 2019**, in which all the 4 estates of MRICOP, namely Estate A, B, C and D as well as the two (2) palm oil mills, viz; **Monorum POM and Anlong Kropeu POM**, were assessed for compliance against the RSPO requirements. The sampling design applied for the assessment include the mill and a minimum sample of x estates, where $x = (0.8\sqrt{y}) \times (z)$, where y is the number of estates and where z is the multiplier defined by the risk assessment. A medium risk multiplier of $z=1.2$ is set for this PMU due to some potential risks in relation to social, environmental and biodiversity factors.

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 Mills were 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 final decision on the certification by Intertek. Note: Submission to an Independent External Peer Reviewer for comments was not required as this was an Annual Surveillance Assessment.

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-01) 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 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 P&C, RSPO SCC, ISCC, Marine Sustainability Chain-of-Custody, MTCS, PEFC Chain-of-Custody and MSPO 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 RSPO, KLK and Intertek. E-mails were sent to applicable stakeholders including government agencies, NGOs and local communities / previous land owners / users. E-mails and telephone enquiries were made prior to the actual assessment and stakeholder's response and feedback received 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
2. Ministry of Mines & Energy
3. Ministry of Women Affairs
4. The Cambodian National Council for Women (CNCW)
5. Ministry of Environment
6. Ministry of Labour & Vocational Training
7. Ministry of Economy & Finance
8. Ministry of Water resource and Meteorology
9. Department of Forestry, Cambodia
10. Department of Wildlife & Biodiversity, Cambodia
11. Department of Immigration
12. Council for Agriculture and Rural Development (CARD)
13. Provincial Governor of Sihanoukville

NGOs (by emails)

1. Association of Protection Development for Cambodia Environment (APDCE)
2. Cambodian Farmer Economic Development (CFED)
3. Cambodian Human Rights and Development Association (ADHOC)
4. Cambodian League for the Promotion & Defence of Human Rights (LICADHO)
5. Cambodian Sanitation and Recycling Organization (CSARO)
6. Centre d'Etude et de Développement Agricole Cambodgien (CEDAC) Cambodia
7. Conservation International (CI) Cambodia
8. Cooperation for Development of Cambodia (Co-DeC)
9. Culture and Environment Preservation Association (CEPA)
10. Development and Partnership in Action (DPA)
11. Fisheries Action Coalition Team (FACT)
12. Gender and Development for Cambodia (GAD/C)
13. Human Resource and Rural Economic Development Organization (Hurredo)
14. Human Rights Vigilance of Cambodia (Vigilance)
15. Indigenous Community Support Organization (ICSO)
16. Khmer Farmers Association (KFA)
17. Khmer Institute for National Development (KIND)
18. Legal Aid of Cambodia (LAC)
19. NGO Committee on the Rights of the Child (NGO-CRC)
- 20. NGO Forum of Cambodia**
21. Organization for Assistance of Children and Rural Women (CWARO)
22. Urban Poor Women Development (UPWD)
23. Wildlife Alliance Cambodia
- 24. World Wide Fund (WWF) Cambodia (Phnom Penh)**
25. Wildlife Conservations Society (WCS) Cambodia

Others interviewed during on-site assessment

1. Gender Committee Members
2. Workers representatives

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3. School Principals
4. Clinic doctors
5. Suppliers / Contractors
- 6. Commune Heads**
- 7. Village Heads / previous land owners / users**

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3.0 ASSESSMENT FINDINGS

3.1 Summary of Findings

Principle 1: Commitment to transparency

Criteria 1.1		
<p>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.</p>		
Indicators	Findings and Objective Evidence	Compliance
<p>1.1.1 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. Minor Compliance</p>	<p>Documented procedure SOP-GA-020 dated 29 Apr 2017 Rev 02 established and implemented for providing such information to relevant stakeholders upon request, was maintained.</p> <p>Over the past 12 months period since August 2018 till audit in May 2019, it was noted that 4 visits from external stakeholders / parties had made requests and visits to the mills and estates which were adequately recorded.</p> <p>Date of public notification of this assessment of the PMU was made on 2 April 2019.</p> <p>As at the period of assessment, there were no additional requests for information from stakeholders for this PMU.</p>	Complied
<p>1.1.2 Records of requests for information and responses shall be maintained. Major Compliance</p>	<p>The PMU maintained an updated list till 1 May 2019, of internal stakeholders, external stakeholders, government departments/agencies, consultants, contractors, suppliers, transporters, etc.</p> <p>Stakeholders' consultation held with records of stakeholders' feedback (positive and negative), and management action plan recorded.</p>	Complied
Criteria 1.2		
<p>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.</p>		
Indicators	Findings and Objective Evidence	Compliance
<p>1.2.1 Management documents that are made available to the public shall include, but are not necessarily limited to: Major Compliance</p>	<p>The PMU had established and maintained 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.</p> <p>MRICOP website https://www.mricop.com.kh has a transparency statement that the various types of mandatory documents are publicly available.</p>	Complied
<ul style="list-style-type: none"> Land titles/user rights (Criterion 2.2); 	<p>Copies of the land titles maintained at the Mill and Estates verified to be in order. The Corporate Office kept the original copies.</p>	Complied
<ul style="list-style-type: none"> Occupational health and safety plans (Criterion 4.7); <p>Major Compliance</p>	<p>Detailed documented plan of OSH was reviewed and updated for the mills and estates.</p> <p>The Risk Assessment (Hazard Identification, Analysis and Risk Control) had included controls implemented at the mills and estates.</p>	Complied

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	<p>Accident and Emergency Procedure SOP-GA-021 dated 29 Apr 2017 Rev 02 documented, maintained and implemented.</p> <p>OSH Policy and Plans were implemented and included activities such as:</p> <ul style="list-style-type: none"> - OSH/ESG (Environment, Social, Gender Sub-committee meetings held 4x per year). - Safe Work Practices / Safe Job Procedures. - PPE at mills and estates. - Health medical check-up (annual). - Emergency preparedness. - First Aid training. - Fire extinguisher. - Ambulance services. 	
<p>• Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); Major Compliance</p>	<p>Environmental and Social Impacts Assessment (EIA and SIA) for Monorum POM, Estate A, B and C carried out in Nov 2011 by Green Consultancy Group and documented. Additional EIA for the Anlong Kropeu POM was carried in May 2014 by the same consultant.</p> <p>Environmental Impacts Assessment and Social Impacts Assessment for the mills and MRICOP Plantation Estates A, B, C & D, including Central Workshops and Health Dispensaries were annually reviewed. Latest review of SEIA was on 1 Mar 2019.</p> <p>Management Action Plans, Monitoring and Continuous Improvement Program covering both the Mills and Estates A, B, C and D, were updated, monitored and satisfactorily implemented till audit in 2019.</p>	<p>Complied</p>
<p>• HCV documentation summary (Criteria 5.2 and 7.3); Major Compliance</p>	<p>Based on the SEIA survey and evaluation, there is only a small HCV area at this PMU, which is the Khmer soldiers' burial site in Estate D and the community forest outside the boundary of Estate C.</p> <p>The New Planting area in Estate C did not contain any HCV as reported by the Environmental/HCV consultant report of May 2014.</p> <p>Annual review of Management and Monitoring Plan of HCV area carried out and updated on 1 May 2019.</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); Major Compliance</p>	<p>Pollution Prevention Plan for the mills and MRICOP Plantation Estates A, B, C & D, including Central Workshops and Health Dispensaries were reviewed in Apr 2019.</p> <p>Key pollutants such as discharge to water ways, emissions to air, contamination to land, and noise pollution were identified.</p> <p>Management Action Plans, Monitoring and Continuous Improvement Program for pollution prevention identified, implemented and monitored.</p> <p>Documented pollution prevention and reduction plans include measures for pollution control, pesticides reduction, plantation waste management, schedule</p>	<p>Complied</p>

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	wastes and domestic wastes disposal, reuse and recycling.	
<ul style="list-style-type: none"> • Details of complaints and grievances (Criterion 6.3); <p>Major Compliance</p>	<p>Complaints and grievances process flowchart and its details are defined in SOP-GA-019 Rev 01 dated 29 Apr 2017.</p> <p>MRICOP has included the necessary details for handling complaints and grievance.</p> <p>Over the previous 12 months period till audit in May 2019, there were no evidences of any no complaint received.</p>	Complied
<ul style="list-style-type: none"> • Negotiation procedures (Criterion 6.4); <p>Major Compliance</p>	<p>Negotiation process flowchart and its details are defined in SOP-GA-022 Rev 02 dated 29 Apr 2017.</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.</p> <p>No further land acquisition was made since 2015 till todate.</p>	Complied
<ul style="list-style-type: none"> • Continual improvement plans (Criterion 8.1); <p>Major Compliance</p>	<p>The PMU has identified and implemented Continuous Improvement Plans for the mills and estates.</p>	Complied
<ul style="list-style-type: none"> • Public summary of certification assessment report; <p>Major Compliance</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
<ul style="list-style-type: none"> • Human Rights Policy (Criterion 6.13). <p>Major Compliance</p>	<p>SOP-GA-025 Rev 01 dated 23 May 2016 on Code of Ethical Conduct and Human Rights. The Human Rights Policy has been communicated to all levels of the workforce and operations. Copies of the policy found to be displayed at prominent locations in the mills and estates.</p>	Complied
<p>Criteria 1.3 Growers and millers commit to ethical conduct in all business operations and transactions.</p>		
Indicators	Findings and Objective Evidence	Compliance
<p>1.3.1 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>Minor Compliance</p>	<p>The Policy of commitment to a Code of Ethical Conduct and Integrity was documented and signed on 06 May 2016 by the MRT-TCC JV President, Mr. Surat Poobankerphol. 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 mills and estates.</p>	Complied

Principle 2: Compliance with applicable laws and regulations

<p>Criteria 2.1 There is compliance with all applicable local, national and ratified international laws and regulations.</p>		
Indicators	Findings and Objective Evidence	Compliance
<p>2.1.1 Evidence of compliance with relevant legal requirements shall be available.</p> <p>Major Compliance</p>	<p>Compliance with land titles and user rights for Estate A and Estate B evidenced by the 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 from year1997) with use of the lands for agriculture.</p> <p>Land ownership of Estate C and Estate D being freehold lands for agriculture use evidenced by a purchase</p>	Complied

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	<p>document dated 27/07/2011. Additional lands in Estate C acquired in 2014 complied with FPIC requirements.</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 POM and Anlong Kropeu POM.</p> <p>A list of applicable laws and sub decrees is available and reviewed on 1 May 2019 for updates by Mr. Sok Chyvo (Admin. Manager). No change in laws for the period Jul 2018 to May 2019.</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>	
<p>2.1.2 A documented system, which includes written information on legal requirements, shall be maintained. Minor Compliance</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 Summary of Laws and Regulations.</p>	Complied
<p>2.1.3 A mechanism for ensuring compliance shall be implemented. Minor Compliance</p>	<p>The 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 (Document Ref. rev 06 "Mechanism for Implementation of Legal Requirements and System for Tracking Changes in the Law).</p> <p>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 and land cess were paid and receipts maintained 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>2.1.4 A system for tracking any changes in the law shall be implemented. Minor Compliance</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 review carried out on 1 May 2019.</p>	Complied
<p>Criteria 2.2 The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.</p>		
Indicators	Findings and Objective Evidence	Compliance
<p>2.2.1 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>Legal ownership of the land and land tenure for Estate A and Estate B 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 with use of the lands for agriculture. Legal ownership of Estate C freehold land for agriculture use evidenced by a purchase</p>	Complied

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<p>Major Compliance</p>	<p>document dated 27/07/2011. Estate C was previously cultivated with sugarcane. Estate D is the result of the division of the large Estate C into a smaller Estate C and a new Estate D (Kirivon). There was no current land dispute in the PMU.</p>	
<p>2.2.2 There is evidence that physical markers are located and visibly maintained along the legal boundaries adjacent to state land, NCR land and reserves. Minor Compliance</p>	<p>Verified that there has been no change to the stated land titles and designated use for agricultural use. 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. Legal boundary markers identified in a location map were sighted and maintained along the perimeters of estate lands which were mapped with a differential Global Positioning System (GPS).</p>	<p>Complied</p>
<p>2.2.3 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). Minor Compliance</p>	<p>The mechanism to resolve any land conflict is established and in place (General Negotiation Procedure SOP-GA-22 Rev 02 dated 29 Apr 2017). The PMU had initiated negotiation and compensation process to resolve some land compensation claims with villagers at Estate C in year 2013 and year 2014. There was evidence of satisfactory resolution of the claims as reported in the previous assessments. Verified that there is currently no land dispute requiring any compensation claim.</p>	<p>Complied</p>
<p>2.2.4 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. Major Compliance</p>	<p>Confirmed that there is no current land conflict.</p>	<p>Complied</p>
<p>2.2.5 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). Minor Compliance</p>	<p>The process of participatory mapping was seen in the resolution of the claims as reported in previous assessments.</p>	<p>Complied</p>
<p>2.2.6 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. Major Compliance</p>	<p>There was no instigated violence seen in the resolution of the claims reported in previous assessments.</p>	<p>Complied</p>
<p>Criteria 2.3 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>
<p>2.3.1 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</p>	<p>There are no customary lands in the concession areas (Estate A and Estate B) and legally owned land (Estate C and D). Cultivation of oil palm in these lands has not diminished any legal rights of villagers either.</p>	<p>Complied</p>

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communities where applicable, and relevant authorities). Major Compliance	There is currently no land dispute requiring compensation claim.	
2.3.2 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: 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; 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; 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. Minor Compliance	There is currently no land dispute and as such this process is not applicable in this assessment.	Not applicable
2.3.3 All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. Minor Compliance	There is currently no land dispute and as such this process is not applicable in this assessment.	Not applicable
2.3.4 Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. Major Compliance	There is currently no land dispute and as such this process is not applicable in this assessment.	Not applicable

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
3.1.1 A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. Major Compliance	Verified that presently, there is only one PMU owned by MRICOP. Currently the MRICOP Grouping comprise of 2 POMs and 4 common supply base estates (Estate A, B, C and D) which still meet the requirements of Multiple Management Units of RSPO Certification Systems Standard. There are no scheme smallholders in the supply base to the PMU. The Management cum Business Plans has documented details of the 5-years Cash Flow Budgets for year 2019 to 2024 covering the mills and estates. The management plans included items such as the planted areas, areas for harvesting, FFB harvesting	Complied

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	<p>(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 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>3.1.2 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>Minor Compliance</p>	<p>Annual replanting programme had been projected up to year 2022 subject to yearly review.</p> <p>Currently, no replanting is required as the first planting started in year 1997. The present mature palms being 22 years and below, which will be maintained until 2022. Supply planting in existing planted areas were verified at the time of audit in 2019.</p>	Complied

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

Criteria 4.1		
Operating procedures are appropriately documented, consistently implemented and monitored.		
Indicators	Findings and Objective Evidence	Compliance
<p>4.1.1 Standard Operating Procedures (SOPs) for estates and mills shall be documented.</p> <p>Major Compliance</p>	<p>The PMU had maintained the over 40 SOPs (SOP GA-001-SOP GA046) established for operations at the Mills and Estates since 2012.</p> <p>Verified that the SOPs were reviewed and revised appropriately in keeping with current operational practices.</p>	Complied
<p>4.1.2 A mechanism to check consistent implementation of procedures shall be in place.</p> <p>Minor Compliance</p>	<p>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 were verified by the Manager regularly.</p>	Complied
<p>4.1.3 Records of monitoring and any actions taken shall be maintained and available, as appropriate.</p> <p>Minor Compliance</p>	<p>The records of monitoring and the actions taken had been maintained at both the mills and supplying estates. These records had been verified to be satisfactory.</p>	Complied
<p>4.1.4 The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB).</p> <p>Major Compliance</p>	<p>Records of the FFB crop is verified to be only from the group estates.</p>	Complied
Criteria 4.2		
Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.		
Indicators	Findings and Objective Evidence	Compliance
<p>4.2.1 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.</p>	<p>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 Maejo University Lab, Chiangmai, Thailand (year 2018-2019)</p>	Complied

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Minor Compliance		
<p>4.2.2 Records of fertiliser inputs shall be maintained. Minor Compliance</p>	<p>Fertiliser applications were carried out in accordance with the Fertiliser Application Programme. The availability of fertilisers had been timed such that they would be applied in the fields shortly after their arrival at the stores. Wooden planks were in place for fertilisers to be stacked to avoid direct contact with the cement floor, thus addressing the previous observation (year 2018: OBS#CBK-01)</p> <p>Records of such activities had been verified to be in order.</p>	Complied
<p>4.2.3 There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. Minor Compliance</p>	<p>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. Soil analysis was carried out recently in February 2019.</p> <p>The most recent analysis of the leaf samples was carried out. The samples were analysed by Maejo University Lab, Chiangmai, Thailand. Reports were adequately maintained.</p>	Complied
<p>4.2.4 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. Minor Compliance</p>	<p>EFB had been applied around the immature and young mature palms at the Estate B, C and D.</p> <p>There was no application of EFB in Estate A, as decided by the management, the mature palms being 20 years and above.</p>	Complied
<p>Criteria 4.3 Practices minimise and control erosion and degradation of soils.</p>		
Indicators	Findings and Objective Evidence	Compliance
<p>4.3.1 Maps of any fragile/marginal soils shall be available. Major Compliance</p>	<p>Soil maps had shown some fragile soil at Estate C in Div. C2 and C3 (about 75 ha). The fragile soil areas are considered to be minimal against the overall size of the planted areas of the estates.</p> <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>	Complied
<p>4.3.2 A management strategy shall be in place for plantings on slopes between 9 and 25 degrees unless specified otherwise by the company's SOP. Minor Compliance</p>	<p>Planting terraces had been constructed on land with on Estate C having slopes of between 15-20 degrees.</p> <p>Estate A's topography was generally flat and therefore no terrace was required in these estates.</p> <p>There was no soil erosion noted during the visit.</p>	Complied
<p>4.3.3 A road maintenance programme shall be in place. Minor Compliance</p>	<p>Road maintenance programme and work done records had been verified to be in order. The estates roads were found to be satisfactorily maintained and roadworthy.</p>	Complied
<p>4.3.4 Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. Major Compliance</p>	<p>There was no peat soil in the estates. This had been confirmed during field visit. Thus this is not applicable.</p>	Not applicable
<p>4.3.5 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. Minor Compliance</p>	<p>As per above.</p>	Not applicable

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<p>4.3.6 A management strategy shall be in place for other fragile and problem soils (e.g. podzols and acid sulphate soils). Minor Compliance</p>	<p>There are no problematic soils on Estates as verified during field inspection and visit. FronD stacking and fertilizer application based on foliar analysis were carried out to maintain the soil fertility.</p>	<p>Complied</p>
<p>Criteria 4.4 Practices maintain the quality and availability of surface and ground water.</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>
<p>4.4.1 An implemented water management plan shall be in place. Minor Compliance</p>	<p>Water management plan was in place and verified to be in order.</p>	<p>Complied</p>
<p>4.4.2 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. Major Compliance</p>	<p>Buffer zones which were marked at the estates were maintained with no application of agrochemicals for the protection of the water courses. Signboards indicating buffer zones as well as those that communicating prohibition of hunting, fishing, spraying, fertilizer application were erected and clearly visible.</p>	<p>Complied</p>
<p>4.4.3 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). Minor Compliance</p>	<p>In Anlong Kropeu Palm Oil Mill, effluent samples were taken at the final discharge points of the effluent pond. Samples were drawn and analysis done in Mar 2019. Results of BOD level had ranged between 78 to 95 ppm, up till Apr 2019. Effluent is discharged to irrigation canals within Estates C and D.</p>	<p>Complied</p>
<p>4.4.4 Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. Minor Compliance</p>	<p>The usage of water at the Mills are monitored monthly. In Monorum Mill, monitoring of water usage in the mill averaged at 3.5 m³/tonne FFB in 2018 till Apr 2019. In Anlong Kropeu Mill, the water consumption was averaging at 1.80 m³/tonne FFB in 2018. Water consumption for Jan-Apr 2019 is at 2.03 m³/tonne FFB.</p>	<p>Complied</p>
<p>Criteria 4.5 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>
<p>4.5.1 Implementation of Integrated Pest Management (IPM) plans shall be monitored. Major Compliance</p>	<p>Records for the planting and monitoring of beneficial plants such as Cassia cobanensis, Antigonon leptopus, Tunera subulata and their respective locations on the field maps were available. The treatments carried out when rodent-damaged FFB had exceeded acceptable level were found to be effective. Records showed rhinoceros beetles were trapped using Pheromone traps and the activity was being continued in Estate C. Bagworm infestation treatment was carried out in Estate A and the management had continued to monitor the needs for treatment.</p>	<p>Complied</p>
<p>4.5.2 Training of those involved in IPM implementation shall be demonstrated. Minor Compliance</p>	<p>Training records for personnel on IPM implementation were available and was verified on-site to be satisfactory during field assessment.</p>	<p>Complied</p>
<p>Criteria 4.6 Pesticides are used in ways that do not endanger health or the environment.</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>

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<p>4.6.1 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. Major Compliance</p>	<p>Written justification for glyphosate and Garlon & other chemicals found in "Justification of Agro-chemical Uses" had been reviewed on 25 – 30 Apr 2019 by respective Estate Managers and approved by Plantation GM.</p>	<p>Complied</p>
<p>4.6.2 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. Major Compliance</p>	<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.</p>	<p>Complied</p>
<p>4.6.3 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. Major Compliance</p>	<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.</p>	<p>Complied</p>
<p>4.6.4 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). Minor Compliance</p>	<p>It is the policy of the group to discontinue the use of Paraquat since Feb 2012. Verified that this policy has been adhered and verified on-site during current assessment.</p>	<p>Complied</p>
<p>4.6.5 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). Major Compliance</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. All precautions attached to the products had been observed, applied, and understood by the workers. Programme and training records had been verified to be satisfactory.</p>	<p>Complied</p>
<p>4.6.6 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. Major Compliance</p>	<p>Storage of pesticides found to be in accordance with the Occupational Safety and Health Laws and Regulations and local laws on pesticides control. Pesticide containers were properly labelled. Emergency shower and eye wash station was available and ready for use. First aid kits, SDS in local language and fire extinguishers were available.</p>	<p>Complied</p>

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<p>4.6.7 Application of pesticides shall be by proven methods that minimise risk and impacts. Minor Compliance</p>	<p>Pesticides had been applied using the proven methods (Best Management Practices) that minimize risk and impacts.</p>	<p>Complied</p>
<p>4.6.8 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. Major Compliance</p>	<p>The Management does not use aerial application of pesticides. This practice has been adhered.</p>	<p>Complied</p>
<p>4.6.9 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). Minor Compliance</p>	<p>Periodic training on pesticide handling had been carried out. Material Safety Data Sheets for the pesticides were available in the stores.</p>	<p>Complied</p>
<p>4.6.10 Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). Minor Compliance</p>	<p>Drums had been punctured with holes at bottom and kept in the store. Some of the 20 litre drums were reused for holding diluted chemical mixture for spraying. The used containers for hazardous chemicals are kept in the store until the relevant authority provides a guideline on the procedure for disposal.</p>	<p>Complied</p>
<p>4.6.11 Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. Major Compliance</p>	<p>Pesticides worker were sent for medical surveillance in July and Aug 2018. The medical results as obtained from the clinics had indicated that all the workers were fit to perform their respective work.</p>	<p>Complied</p>
<p>4.6.12 No work with pesticides shall be undertaken by pregnant or breast-feeding women. Major Compliance</p>	<p>Verified from records and through interviews with female field workers that no pregnant or breast-feeding woman had been offered work which required her to handle hazardous chemicals.</p>	<p>Complied</p>
<p>Criteria 4.7 An occupational health and safety plan is documented, effectively communicated and implemented.</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>
<p>The occupational health and safety plan shall cover the following: 4.7.1 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. Major Compliance</p>	<p>Occupational Safety and Health (OSH) plan in compliance with OSH Act and Factory Machinery Act was documented and implemented. OSH policy was clearly displayed at POM and in estates office. Workers had demonstrated awareness towards occupational safety and health policy. POM & its estates established their accident reporting KPI, and incident monitoring implemented. Procedures and actions documented and implemented on the issues concerned. Training programmes for year 2018-2019 were implemented. Records of training on safe working practices for workers involved in pesticides spray, use of fire extinguishers, awareness & understanding of MSDS/CSDS, First Aid boxes were sighted at both POM & estates.</p>	<p>Complied</p>

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	<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 of POM.</p> <p>The workers had undergone medical checks annually and were all found to be fit for work.</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 and fertilizer applications.</p> <p>The Safety & Health officer was responsible for overall in charge of safety and health planning, operation & coordination.</p> <p>Adequate fire extinguisher are located at strategic locations, at the Mills, Estates offices and housing areas.</p> <p>First Aid Kits and 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 at Estate A and Estate C, where harvesting and weed slashing activities were observed during field visit.</p>	
<p>4.7.2 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>Major Compliance</p>	<p>Risk assessment was carried out on all operations where workers health and safety are potential issues (e.g. noise exposure, pesticides/chemicals exposure, accident, fire). All operations had been risk assessed, documented and implemented.</p> <p>The workers were observed to have worn the required PPE and during interview were able to confirm that PPE was provided to them by the estate management.</p> <p>However, a noncompliance was raised as follows:</p> <p>(a) At all the Estates, harvesting sickles and chisels were not covered when not in use.</p> <p>(b) Old motorcycle tube was used as cover for sickle by the worker carrying out bagworm census at Estate A.</p> <p>(c) Fertiliser bags were used as covers for slashing machetes. These may not be suitable for such purpose.</p> <p>(d) Clean water was not available for eyewash at Estates B, C and D for workers carrying out harvesting work.</p> <p>(e) At Estate C, re-assessment of risks conducted on 24 April 2019 had not included the accident that occurred on 23 February 2019 (worker's left foot was cut by slashing machete).</p>	<p>2019 Major NC: CBK-01</p>
<p>4.7.3 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>Major Compliance</p>	<p>Training programme had been carried out.</p> <p>All workers involved had been adequately trained on the safe working practices for the respective field work.</p> <p>Appropriate PPE had been provided to all workers at the place of work to cover all potentially hazardous operations.</p>	<p>Complied.</p>

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<p>4.7.4 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. Major Compliance</p>	<p>There were OSH meetings between responsible persons and the workers at the Mills and Estates at intervals and meeting records were maintained. Issues raised were followed up and these were verified.</p> <p>However, a noncompliance was raised as follows: At the Anlong Kropou Mill, there was no evidence to show that OSH/ESG meetings were held since July 2018.</p> <p>At the estates, the minutes of the OSH/ESG meetings recorded general statements on matters such as work safely, use PPE, drive carefully etc. However, there was no action plan on what will be done, who will be responsible and how these can be achieved regarding these matters.</p> <p>There was also no evidence that matters related to prevention of accidents, risk re-assessments, new risk assessment, adequacy of procedures, medical check-up results and other health issues were discussed.</p>	<p align="center">2019 Major NC: CBK-02</p>
<p>4.7.5 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. Minor Compliance</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. The items and contents were regularly checked and topped up when needed. Records of checking were available and maintained. Records on all accidents had been verified to be maintained satisfactorily. Review on accident cases had been carried out during quarterly meeting of the Environment, Safety, & Health (ESH).</p> <p>The management had implemented a checklist to monitor the readiness of the fire extinguishers by monthly check on the expiry date and the pressure indicator on the extinguishers.</p> <p>The Management had implemented the Procedure For Fire Prevention And Fire Fighting Plan by which fire-fighting teams were established and trained by the local Fire Services Department. The Fire-Fighting teams were equipped with the necessary equipment under the advice of the Fire Services Department. The equipment included a fire-truck with hose, reel, ladder, pumps, nozzles and other tools. Records showed the trucks were monitored for readiness by the drivers who were members of the firefighting teams.</p> <p>The corrective actions were appropriate in addressing the previous 2018 (NC#CBK-01) and closed.</p>	<p align="center">Complied</p>
<p>4.7.6 All workers shall be provided with medical care, and covered by accident insurance. Minor Compliance</p>	<p>Medical care had been provided to all the workers via the estate clinics. Local workers are covered by National Social Security Fund (NSSF) and Healthcare and Accident insurance is covered under Prevoir Insurance which is valid till Mar 2019.</p>	<p align="center">Complied</p>
<p>4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. Minor Compliance</p>	<p>The Mill and estates had recorded the occupational injuries using the Lost Time Accident metrics.</p>	<p align="center">Complied</p>
<p>Criteria 4.8 All staff, workers, smallholders and contract workers are appropriately trained.</p>		

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Indicators	Findings and Objective Evidence	Compliance
<p>4.8.1 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. Major Compliance</p>	<p>A formal training programme on all aspects of RSPO Principles and Criteria was established and implemented. Training for various categories of office management, operations and sustainability team members with regards to their roles and duties were reviewed for 2018/2019 and acceptable.</p>	Complied
<p>4.8.2 Records of training for each employee shall be maintained. Minor Compliance</p>	<p>Records for training attended by individual employees including refresher briefing /training for field workers till Apr 2019 were verified to be updated and maintained.</p>	Complied

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

Criterion 5.1		
<p>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>		
Indicators	Findings and Objective Evidence	Compliance
<p>5.1.1 An environmental impact assessment (EIA) shall be documented. Major Compliance</p>	<p>Environmental Impact Assessment (EIA) and Social Impact Assessment (SIA) for the mills and estates were initially carried out by Green Consultancy Group (SEIA Report for Estate A & Estate B dated Nov 2011 and SEIA Report for Estate C dated May 2014) (Note: Estate C was subsequently divided into two estates, viz; a smaller Estate C and a new Estate D (Kirivon) and this change was found to be in compliance during the surveillance assessment ASA-04 (last cycle).</p> <p>Contents of the EIA report had included the following matters:</p> <ul style="list-style-type: none"> • The laws related to environment and pollution. • Positive and negative impacts of aspects were assessed with mitigation plans. • The soils with geology and parent materials were documented. • The polluting activities with direct impact on water bodies and air. • The wildlife, flora and fauna and its classification of rare, threatened and endangered species (RTE) potentially existing in and around the vicinity of the extended areas. <p>Subsequently, EIA reviewed annually taking into consideration changes and stakeholders' feedback.</p>	Complied
<p>5.1.2 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 management plan. The management plan shall identify the responsible person/persons. Minor Compliance</p>	<p>Environmental Impact Assessment, Management Action Plans, Monitoring and Continuous Improvement Program for the Monorum POM and Anlong Kropeu POM documented and reviewed by the Mill Shift Operation Manager on 01/03/2019 and approved by the Mill Director on 01/03/2019.</p> <p>Environmental Impact Assessment, Management Action Plans, Monitoring and Continuous Improvement Program for the Estates A, B, C and D, including Central Workshop & Health Dispensary has been documented and reviewed by the Senior Maintenance Manager on 29/04/2019 and approved by the Plantation Director on 29/04/2019.</p>	Complied

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	The Action Plans were implemented and monitored.	
<p>5.1.3 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>Minor Compliance</p>	<p>The documented environmental plans and monitoring of operational changes were reviewed on an annual basis. Implementation on the effectiveness of mitigation measures was also reviewed.</p> <p>Details of daily operational activities and its aspects of negative and positive impacts including pruning, fertilizing, pesticide spraying, waste disposal, road maintenance and environmental emissions were available. 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 mills and estates were monitored. Monitoring of air quality emissions from the stack discharge was carried out for both mills.</p> <p>Corrective action taken on previous assessment ASA-01 (2018) Minor NC# OCL-01 verified to be effectively implemented.</p>	Complied
<p>Criterion 5.2</p> <p>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>		
Indicators	Findings and Objective Evidence	Compliance
<p>5.2.1 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>Major Compliance</p>	<p>HCV assessment carried out by an RSPO approved HCV consultant, Environ Logic Consultancy and report dated Mar 2012. The HCV assessment made was in accordance with the recommended RSPO-‘HCVF Toolkit’ and covered both the planted area and wider landscape level considerations.</p> <p>Conservation and HCV areas were identified at the mills and estates with relevant maps and estimated size/ hectareage indicated.</p>	Complied
<p>5.2.2 Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through an action plan.</p> <p>Major Compliance</p>	<p>There is no HCV habitats or rare, threatened or endangered (RTE) species that could be significantly affected by the PMU. There was only a small HCV area within the PMU, which is the soldiers’ burial site located inside Estate C. This has been maintained as a conservation area and protected by the PMU. There is also the Neak Ta Thmar Prung community forest at the boundary of Estate D, which has been conserved for villagers to collect fire woods. It is verified during current assessment on site that there is no change to the conservation/HCV areas. The estates in the PMU are also surrounded by mountains at its boundaries. So far, there has been no reported sightings of any RTE species from the mountain areas.</p> <p>The annual review of Conservation and potential HCV areas for Estate A, Estate B and Monorum POM was carried out and documented on 29/04/2019.</p> <p>In Estate A, the conservation areas identified are:</p> <ol style="list-style-type: none"> (1) the water ponds at Division A1, A2 and A3; (2) the streams and buffer zones at Division A2 and A4; (3) the tube wells at Division A4 and Division A2 at Estate A Office. 	Complied

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	<p>In Estate B, the conservation areas identified are:</p> <ol style="list-style-type: none"> (1) the water ponds at Division B2; (2) the streams and buffer zones at Division B1 and B4; (3) the tube wells at Division B1, B2, B3 and B4. <p>The annual review of Conservation and potential HCV areas for Estate C, Estate D and Anlong Kropeu POM was carried out and documented on 29/04/2019.</p> <p>In Estate C, the other conservation areas identified are:</p> <ol style="list-style-type: none"> (1) the two water ponds at Division C2 for Anlong Kropeu POM; (2) the streams and buffer zones at Division C1 and C3; (3) the tube wells at Division C2; (4) The unplanted area in Division C3; (5) the soldiers' burial site at Division C2. <p>In Estate D, the conservation areas identified are:</p> <ol style="list-style-type: none"> (1) the unplanted areas in Division D2 and D4 due to being flood prone during rainy season; (2) the Neak Ta Thmar Prung community forest at boundary of Division D4; (3) the buffer zone between D2 and Division C3 of Estate C. <p>Action plans had included the monitoring and control of any illegal hunting, fishing or collecting activities.</p> <p>Signboards for conservation areas, buffer zones and signages that prohibit hunting, fishing and water polluting activities were verified on-site and found to have been satisfactorily maintained.</p> <p>Signage placed at the border of the community forest located outside the boundary of Estate D.</p>	
<p>5.2.3 There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated 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>Minor Compliance</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>Awareness programs carried out to educate the workforce about the status of RTE species carried out and the latest training was on 27/04/2019. Records (training content, attendance list and photos) on the training program were maintained.</p>	<p>Complied</p>
<p>5.2.4 Where an action plan has been created there shall be ongoing monitoring:</p> <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the action plan. <p>Minor Compliance</p>	<p>Environmental Management & Monitoring Plan had included monitoring at the Conservation & HCV areas for potential RTE such as rare species of birds (as per the list of Ministry of Agriculture Forestry and Fishery 2007 and IUCN List) in the concession areas of Estates A and C & D.</p> <p>Regular patrols within the mills and estates, i.e. at least once monthly, had been carried out by the Estate Executives or Assistant Managers to monitor the status of conservation / buffer zone areas and RTE species. Findings (e.g. wildlife sighting or evidence of any encroachment) recorded by the respective Estate Executives.</p>	<p>Complied</p>

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	<p>Following sightings reported for the period Jun 2018 to date as follows:</p> <ol style="list-style-type: none"> 1. Wild boars, monkeys and storks reported in Estate A. 2. Two male and six female peacocks (<i>Pavo Cristatus</i>) reported in Division B2 of Estate B. 3. Monkey and peacock reported in Division C2 of Estate C. 4. No sighting in Estate D. <p>No encroachment or illegal activities reported.</p>	
<p>5.2.5 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 rights.</p> <p>Minor Compliance</p>	<p>It is verified that there has been no instance of HCV set-aside that conflicts with the rights of local communities at the PMU. Thus, negotiated agreement of such nature is not required.</p>	Complied
<p>Criterion 5.3 Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.</p>		
Indicators	Findings and Objective Evidence	Compliance
<p>5.3.1 All waste products and sources of pollution shall be identified and documented.</p> <p>Major Compliance</p>	<p>The management has identified the listing of all the types of wastes at the mills and estates. Type of waste and source of pollution identified are rotten bunches, pruned oil palm fronds, empty fertilizers bags, empty pesticide drums, pesticide jerry cans, pesticide empty containers, pesticide empty bottles, used lubricants, used oil filters and domestic waste.</p> <p>Due to lack of buyers in Cambodia for recyclable waste such as plastic and paper, only scrap iron being segregated from general and domestic waste for recycling.</p> <p>Proper storage areas were identified for the storage of the scheduled wastes.</p>	Complied
<p>5.3.2 All chemicals and their containers shall be disposed of responsibly.</p> <p>Major Compliance</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
<p>5.3.3 A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.</p> <p>Minor Compliance</p>	<p>Waste Management Plan for the Monorum POM and Anlong Kropeu POM reviewed by the Technical & Engineering Manager on 01/03/2019.</p> <p>Waste Management Plan for the Estates A, B, C and D, including Central Workshop & Health Dispensary reviewed by the Senior Maintenance Manager on 29/04/2019 and approved by the Plantation Director.</p>	

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	<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 in the estates had been implemented. Management of EFB application plans and progress reports were verified to be satisfactory.</p> <p>At both mills, POME is applied directly to the nearby fields as recommended by the appointed Agronomist supported by Maejo University Lab, Chiangmai, Thailand</p> <p>Landfills for the estates were found to be satisfactorily managed, fenced, and the sites were 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>Location: Estate B, C & D</p> <p>Signboards were available at the landfills but the date of opening and date of closing of the pits were not indicated, where applicable.</p>	<p>2019 OBS: OCL-01</p>
<p>Criterion 5.4 Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>
<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>Minor Compliance</p>	<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 PK shells were used as renewable energy/fuel.</p> <p>Monthly records of energy consumption of non-renewable and renewable fuel per metric tonne of FFB at the mills were available.</p> <p>It was verified that energy usage was monitored and data compiled at the POMs for comparison and control.</p> <p>The estate maintained monthly diesel consumption records and the average consumption for year 2018 as follows:</p> <ol style="list-style-type: none"> 1. Estate A: 1.53 litres/MT FFB; 2. Estate B: 2.71 litres/MT FFB; 3. Estate C: 2.52 litres/MT FFB; 4. Estate D: 2.64 litres/MT FFB. <p>Location: Estate A</p> <p>Estate A maintained monthly diesel consumption records but only for their own vehicles and activities. There were no records available or maintained for the diesel consumption by contractors.</p>	<p>2019 Minor NC: OCL-01</p>
<p>Criterion 5.5 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>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>

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<p>5.5.1 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></p> <p>Major Compliance</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 firefighting plans, equipment 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>	<p>Complied</p>
<p>5.5.2 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></p> <p>Minor Compliance</p>	<p>The PMU has adhered to the 'zero burning' policy. 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>	<p>Complied</p>
<p>Criterion 5.6 Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>
<p>5.6.1 An assessment of all polluting activities shall be conducted, including gaseous emissions; particulate/soot emissions and effluent (see Criterion 4.4).</p> <p>Major Compliance</p>	<p>The PMU had reviewed the environmental impact assessment on potential pollution to air, water and contamination on land on an annual basis.</p> <p>POME treatment, monitoring and land application is monitored and records maintained.</p>	<p>Complied</p>
<p>5.6.2 Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented.</p> <p>Major Compliance</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.</p> <p>Latest report on air emission monitoring at the mills was on 31 May 2018.</p> <p>Location: Monorum POM</p> <p>(1) The test and analysis results for POME (which the PMU does not discharge into waterways/streams but use for field application) was not available for year 2019 for verification.</p> <p>(2) The latest report on air emission quality test and analysis was on 31 May 2018. There was no test and analysis results on air emission quality available for year 2019 for verification.</p>	<p>2019 Major NC: OCL-01</p>
<p>5.6.3 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>Minor Compliance.</p>	<p>The monitoring system for significant pollutants was implemented and data compiled and to be reviewed on a monthly basis by the respective mill and estate managers.</p> <p>Water samples at the inlet and outlet of stream water taken at various locations in Estate A, B & C and analyzed. Results for May 2018 complied with the following requirements of the standard:</p>	

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	<ol style="list-style-type: none"> 1. BOD <80 mg/L, 2. TSS < 120 mg/L, 3. Dissolved oxygen > 1 mg/L, 4. pH between 5 to 9, 5. COD < 100 mg/L. <p>Location: Estate A, B & C</p> <p>Water samples at the inlet and outlet of various streams in these estates were not yet carried out for year 2019 (Noted that the previous sampling and testing were done in May 2018).</p> <p>Water samples at the tube wells at various locations in Estate A & B and analyzed. Results taken in May 2019 complied with the following requirements of the Drinking Water Standard:</p> <ol style="list-style-type: none"> 1. pH 6.5 to 8.5, 2. Total Dissolved Solid < 800 mg/L, 3. Turbidity < 5 NTU, 4. Color < 5 TCU, 5. Arsenic < 50 micrograms/L, 6. Cadmium < 3 micrograms/L, 7. Lead < 10 micrograms/L, 8. Mercury < 1 micrograms/L, 9. Copper < 2 micrograms/L, 10. Faecal Coliform 0 cfu/100 mL. <p>The PMU had implemented the RSPO PalmGHG tool (ver. 3.0.1) and submitted the PalmGHG Summary Report to RSPO Secretariat via email on 10/04/2019.</p> <p>Corrective action taken on previous assessment ASA-01 (2018) Minor NC# OCL-02 verified to be effectively implemented.</p>	<p>2019 OBS: OCL-02</p>
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Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers

<p>Criteria 6.1 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>6.1.1 A social impact assessment (SIA) including records of meetings shall be documented.</p> <p>Major Compliance</p>	<p>MRICOP Group Social Assessment for MRICOP/MTSI Plantation for the mills and estates was last reviewed on 29 April 2019 by Mr. Sok Chyyo, Admin Manager and Mr. Sarik Bunthoeurn, Senior Manager, Admin/HR.</p> <p>It was found that this document is in additional to the EIA/SIA for MRICOP/MTSI Economic Land Concession and freehold land carried out by the Green Consultancy Group and the report complied in November 2011 and a further assessment was conducted for Estate D in May 2014.</p> <p>The objectives of SIA initiated by MRICOP/MTSI is:</p>	<p>Complied</p>

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	<ol style="list-style-type: none"> 1. Identifying the social impacts and consequences due to operation of the oil palm plantation in the working area; 2. Preparing recommendations for reducing/minimizing negative impacts and improving positive impacts; 3. Documentation and identification process of social impacts to MRICOP/MTSI as part and planning for Social management and fulfilment of Criteria 2.1, Criteria 6.1, Criteria 7.1 and other social criterial of RSPO Standard. <p>The SIA covers;</p> <ol style="list-style-type: none"> 1. Land ownership; The process for the land title issued to all villagers completed; 2. Availability of resources; No more available land for further development as the concession area completely planted. The management do not prohibit any villagers for access to firewood and/or fishing, except that no illegal fishing and illegal cutting tree along buffer and conservation zones. Some riparian zones are left along the main river and/or stream. 3. Employment opportunity and wages; Management has provided employment opportunities. Evidence by the number of workers from the surrounding villages. HR Department has made the comparison and concluded the company wages are higher than other industries. 4. Contribution to the community: <ol style="list-style-type: none"> 4.1 supplying laterite for extension of road no. 4 within the concession land; 4.2 participation at estate and individual level at temple functions; 4.3 annual company party in December 2012 – invited the workers, staff and immediate stakeholders; 4.4 build a laterite road to CheoungKran village to benefit 49 families; 4.5 currently building new laterite road at Kompong Seila (1.4 km); 4.6 provide the tube well for water source for Anlong Kroupeu Temple and land filling around the temple. 5. Human asset; Creation of employment. Availability of better education facilities by providing living expenses of USD 20 per month to 45 teachers in 8 schools. Improve on health services by providing male and female nurses on site. 6. Physical asset; Availability of better road and free access to stakeholders. 7. Social asset – <ol style="list-style-type: none"> 7.1 there is an SOP on land acquisition. Land is acquired only after negotiations in a participatory manner. Records of final payment are available; 7.2 the company does not practice any discrimination; 7.3 the company will have more dialogue with villager. Stakeholder meeting will be held once a year; 	
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	The annual meetings for both internal and external stakeholder consultations were documented and available for verification. Last stakeholder meeting was conducted on 28 March 2019.	
<p>6.1.2 There shall be evidence that the assessment has been done with the participation of affected parties.</p> <p>Major Compliance</p>	<p>The assessment was done with the affected parties. Documented participant lists and photographs of the meeting was held. The participants include internal and external parties. The participants include representatives of workers, contractors, local community leaders and government agencies.</p> <p>Master-list of stakeholders 2019 is maintained and updated by the PMU. It was further verified during the site tour and confirmed by village head: Mr. Long Vann of Anlong Krapeu Village, teachers and workers that consultation was conducted by the PMU.</p>	Complied
<p>6.1.3 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>Major Compliance</p>	<p>The SIA implementation and monitoring plan for 2019 was last reviewed on 29 April 2019 to promote the positive impacts and to mitigate the negative ones has been developed.</p> <p>The feedback and comments from the stakeholders meeting on 28 March 2019 were recorded and actions needed were taken into account during the review of the SIA.</p> <p>The responsible persons responsible has been identified in the plan.</p> <p>However, non-compliance was raised as follows: Location: Estates A - D There is no documented evidence on the timetable available for review on the mitigation of negative impacts and promotion of the positives for all the affected parties. On-site Management interviews further confirmed that such timetable is not available and monitoring was done on a basis of upon request only, which was not adequately documented.</p>	2019: Major NC:EC-01
<p>6.1.4 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>Minor Compliance</p>	<p>MRICOP Group Social Assessment for MRICOP/MTSI Plantation for the mills and estates was last reviewed on 29 April 2019 and 13 June 2018. It was further found that the assessment is conducted annually with the participation of affected parties.</p> <p>The plan has been updated to include those mitigation not close from previous year.</p> <p>The feedback and comments from the stakeholders meeting on 28 March 2019 were recorded and actions needed were considered during the review of the SIA. It was further verified during the site tour and confirmed by village head, teachers and workers that consultation was conducted by the PMU.</p>	Complied
<p>6.1.5 Particular attention shall be paid to the impacts of smallholder schemes</p>	Verified that there were no Oil Palm smallholders in the PMU.	Not applicable

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(where the plantation includes such a scheme).		
Minor Compliance		
Criteria 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.		
Indicators	Findings and Objective Evidence	Compliance
<p>6.2.1 Consultation and communication procedures shall be documented.</p> <p>Major Compliance</p>	<p>The PMU has established SOP-GA-022, Rev 2; General Negotiation effective 29 April 2017 and the purpose are:</p> <ol style="list-style-type: none"> 1. to solve the land dispute issues and other general disagreement problems; 2. providing value of in house/out-source counselling; 3. to gain recognition of either issues or parties; 4. to obtain information about issues, interests and positions of other parties; 5. exchange perceptions from one to other parties; 6. to bring about a desired change in a relationship; 7. to develop new procedures for both parties' application. <p>A master-list of stakeholders for 2019 is available which includes:</p> <ol style="list-style-type: none"> 1. Government Ministries/Agencies; 2. NGO for Environment, Human Right and Social; 3. Community leaders; 4. Local authority; 5. School principals; 6. Clinic doctors; 7. Suppliers and contractors; 8. Nearby community leaders that may be affected; 9. Others (Cattle farmers). <p>PMU also declares its commitment to RSPO transparency requirements by providing a page with instructions on how stakeholders could communicate their concerns directly via http://www.mricop.com.kh/index.php/link/rspo-certification-project</p> <p>The webpage was reviewed on site and confirmed and remain valid. Furthermore, the information could be made available upon written request by email; it_nop@live.com or contact the address and contact person as provided in the website.</p> <p>Interviews with community leader, teachers and workers during the site visit found that the PMU process on communication and consultation is adequate.</p>	Complied
<p>6.2.2 A management official responsible for these issues shall be nominated.</p> <p>Minor Compliance</p>	<p>The PMU has nominated Mr. Sok Chyvo, Admin Manager as the management official responsible for communication and consultation with the effected parties including social related issues. His appointment is by Mr. Sarik Bunthoeuon, Senior HR Admin Manager. Both Mr. Sok and Mr. Sarik appointment letters with the job description were verified.</p> <p>At the estates and mill level, these issues are under the responsibility of the respective managers and coordinated</p>	Complied

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	with 3 sub-committee. Interviews done verified that they understand their specific roles and responsibilities and were actively involved in the implementations needed including participation in the sub-committee.	
<p>6.2.3 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. Minor Compliance</p>	<p>A master-list of stakeholders for 2019 is available which includes:</p> <ol style="list-style-type: none"> 1. Government Ministries/Agencies; 2. NGO for Environment, Human Right and Social; 3. Community leaders; 4. Local authority; 5. School principals; 6. Clinic doctors; 7. Suppliers and contractors; 8. Nearby community leaders that may be affected; 9. Others (Cattle farmers). <p>The master-list was last reviewed on 21 March 2019.</p> <p>The feedback and comments from the stakeholders meeting on 28 March 2019 were recorded. Other records reviewed include briefing conducted for stakeholders and invitation letter or notification on stakeholders meeting.</p>	Complied
<p>Criteria 6.3 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.</p>		
Indicators	Findings and Objective Evidence	Compliance
<p>6.3.1 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. Major Compliance</p>	<p>The PMU has established procedure SOP-GA-019, Rev 2; effective 29 April 2017; Compliant/Grievance. The purpose of this procedure:</p> <ol style="list-style-type: none"> 1. support the employee-worker or stakeholders with straightforward, appropriate and effective processes for resolving complaints; 2. guarantee that complaints are dealt with based on evidence and proper investigation; 3. ensure that every issue raised in complaints receive an appropriate explanation; 4. be operated in a respectful and sensitive way, value people's point of view, having due respect for confidentiality; 5. produces information which will help us to learn how to improve the employer-workers performance and company service; 6. to ensure that it is possible to take relevant step to eradicate shortcoming in the company management. <p>Last stakeholder meeting on 28 March 2019 whereby the PMU has raised some concern on the following:</p> <ol style="list-style-type: none"> 1. Cattle entering the estate and destroy the immature palm, total damage palm of 102,136 or about 772 ha; 2. Wildfire on boundary of land owned by other spread into the estate; 3. Villagers/outsider collecting loose fruit and was caught by the security. Estimated about 2.5 MT of these activities; and those caught were requested to sign a pledge; 4. Shortage of number of workers from villagers due to other job. <p>Issues raised by other stakeholders include:</p>	Complied

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	<p>1. District of Environment Officer; Wages of workers still low in comparison to other company;</p> <p>2. Village head Svay Village People from her village from the age of 18-35 went to garment factory. Better wage and proposed 30,000 (USD 7.5) per day.</p> <p>There has been no disputes and whistle blowing incident reported for the previous year.</p>	
<p>6.3.2 Documentation of both the process by which a dispute was resolved and the outcome shall be available.</p> <p>Major Compliance</p>	<p>The general complaints received were noted to include maintenance needed on workers housing quarters and road conditions. Request for maintenance is managed by respective managers in charge and the maintenance unit. Records and photographs of maintenance works completed were maintained.</p> <p>To further improve on the process, a committee is established to manage general complaints and consultation with the effected parties which include the workers. The committee consist of:</p> <ol style="list-style-type: none"> 1. A main committee (RSPO Steering Committee); 2. And with 3 sub-committee (OSHE Committee – Plantation, OSHE Committee Manufacturing & Social and Gender Committee). <p>Each committee is responsible for the specific functions and objectives.</p> <p>It was further noted that the following: Mr. Sarik Bunthoeurn, Senior HR & Admin Manager has been appointed as the Chairman of the Social & Gender Committee and Mr. Somchai Rungreang, Manufacturing Director as the Chairman for OSH & Environment Committee which are the main committee.</p> <p>At sub-committee level, OSH & Environment, Social & Gender meeting is conducted every quarterly Last meeting on Social & Gender meeting was conducted on 20 March 2019 for Estate C and 29 April 2019 for Estate D</p> <p>Main committee meeting was conducted on 24 April 2019 whereby each representative from each committee from each site is present with the PMU management team.</p> <p>To ensure all committee is aware of their responsibility, training records were reviewed and found the last training was conducted on 16 March 2019 for Estate C and 19 February 2019 for Estate D.</p> <p>However, non-compliance was raised as follows: Location: Estates A, B, C & D Based on management interview, it was noted that the respective estates do receive verbal complaints and grievances from various stakeholders. However, the process of maintaining the records of complaints and grievance was not adequate although the issues were noted to be progressively resolved.</p>	<p>2019 Major NC: EC-02</p>

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<p>Criteria 6.4 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>		
Indicators	Findings and Objective Evidence	Compliance
<p>6.4.1 A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place.</p> <p>Major Compliance</p>	<p>Concession agreement between PMU with The Ministry of Agriculture, forestry and Fishery dated 25 March 1995 on the investment and development of oil palm plantation,</p> <p>PMU JV with MRT-TCC Sugar Investment Co Ltd covers a total of:</p> <ol style="list-style-type: none"> 1) 6607 ha; 20 Sept 2006. 2) 757.19 ha; 13 Feb 2007 3) 923.38 ha; 13 Feb 2007 <p>The procedure provides the process for identifying legal and customary rights and for identifying people entitled to compensation.</p> <p>Based on interview with stakeholders from nearby villagers, it was verified that there was no new land acquisition and compensation issues.</p> <p>The PMU has established a documented policy on compensation management PC-GA-015, last reviewed 1 March 2010; Compensation Management for the purpose of internal equity, external competitiveness and motivation of employees. This procedure covers the compensation benefits if applicable for the PMU employees.</p>	<p>Complied</p>
<p>6.4.2 A procedure for calculating and 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>Minor Compliance</p>	<p>The PMU has established Procedure LC-NP-FC-005/17; Land Compensation and Negotiation Procedure which was last review on 2 June 2017 and approved on 13 June 2017 by Mr. Sunchai Choo-Ngan, General Manager, MRICOP/MTSI</p> <p>There is a documented procedure for calculating and distributing compensation, i.e. Land compensation and Negotiation procedure Flow chart.</p> <p>The procedure followed and implemented based on the processing flowchart.</p> <p>It was further found that the PMU has a No Expansion Statement Policy where the management has there for decided it will not seek any new land acquisition for the expansion of new oil palm planting, instead on focusing on enhancing and improving the existing oil palm plantation of 16,000 hectare through increasing yield and seeking more competitive advantages in terms of production cost and FFB yield per hectare.</p> <p>The statement was signed by Mr. Sumate Pratumswan, Managing Director dated 27 December 2016.</p>	<p>Complied</p>
<p>6.4.3 The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the</p>	<p>Verified that there are no new issues of such nature during present audit.</p>	<p>Complied</p>

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<p>participation of affected parties, and made publicly available.</p> <p>Major Compliance</p>																																
<p>Criteria 6.5 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>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>																														
<p>6.5.1 Documentation of pay and conditions shall be available.</p> <p>Major Compliance</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. The translation of the documented evidence was confirmed by our appointed translator which was present through-out the assessment.</p> <p>This applies to all workers i.e. skill, semi-skilled and unskilled workers. Reviews of pay statements verified to have contained all necessary information and can be understood by the workers, e.g. type and rate of works completed, days offered, days worked, days absent, total deduction, etc.</p> <p>Sampling of the workers' pay-slips were reviewed based on the following:</p> <ul style="list-style-type: none"> a) Peak period: March 2018; b) Low period: September 2018; and c) Current period: April 2019. <p>Number of samples taken are based on the number of workers and gender:</p> <table border="1" data-bbox="614 1283 1222 1653"> <thead> <tr> <th>Estate</th> <th>A</th> <th>B</th> <th>C</th> <th>D</th> </tr> </thead> <tbody> <tr> <td>Number of Female workers</td> <td>71</td> <td>66</td> <td>98</td> <td>111</td> </tr> <tr> <td>Number of Male workers</td> <td>12</td> <td>18</td> <td>37</td> <td>86</td> </tr> <tr> <td>Number of samples taken for female workers</td> <td>9</td> <td>8</td> <td>10</td> <td>11</td> </tr> <tr> <td>Number of samples taken for male workers</td> <td>4</td> <td>4</td> <td>6</td> <td>9</td> </tr> <tr> <td>Total sample size</td> <td>13</td> <td>12</td> <td>16</td> <td>20</td> </tr> </tbody> </table> <p>A review of the field workers' pay-slips showed that the calculation of pay is clearly itemised for:</p> <ul style="list-style-type: none"> - Normal day field work wage [Daily Rated or Piece Rated]; - Normal working day overtime; in accordance with regulations; - Working rest day; - Overtime for working rest day; - Working public holiday; - Overtime for working public holiday; - Sick and annual leave pay; - Maternity leave. 	Estate	A	B	C	D	Number of Female workers	71	66	98	111	Number of Male workers	12	18	37	86	Number of samples taken for female workers	9	8	10	11	Number of samples taken for male workers	4	4	6	9	Total sample size	13	12	16	20	<p>Complied</p>
Estate	A	B	C	D																												
Number of Female workers	71	66	98	111																												
Number of Male workers	12	18	37	86																												
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	<p>All the workers' pay-slips reviewed found no evidence of gender discrimination.</p> <p>Work performed by workers are categories into 3 band; skill, semi-skill and un-skill.</p> <p>Each band wages were last reviewed on January 2015. The wages were compared from last wages in 2011. The wages show an increase in accordance with the 3 bands established by the PMU. The increases are:</p> <ul style="list-style-type: none"> a) Skill – 26.3% (current 20,000 riel/day); b) Semi-skill – 30.0% (current 18,200 riel/day); c) Un-skill – 62.0% (current 16,200 riel/day). <p>The PMU has also determined the daily rice allocation allowance applicable in accordance with legal requirement agreeable with the workers. The daily rice allocation is determined at 3,800 riel/day. The PMU have established an incentive attendance program which is payable at 13,300 riels for perfect attendance. Workers who absent before or after public holidays are not eligible for the incentive pay [or in this case equivalent to public holiday pay] as they are considered as violating their employment contract with the management. Workers salary is paid every 10 days based on the calendar date which the PMU is complying.</p> <p>Based on workers interview, it was confirmed that the worker understanding the wages band and the allowances and incentive provided by the management.</p> <p>The PMU has appointed Mr. Theanglay Seang (Compensation & Benefit Manager) as the responsible management representative to ensure the wages and benefit is reviewed based on regulatory and others that may effect the changes of the wages and benefits.</p>	
<p>6.5.2 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>Major Compliance</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"> - job position; - basic pay and overtime; - working hours; - work expectations; - termination terms; - Food allowance. <p>Based on workers interview, the female workers confirmed their entitlement for 90 days maternity leave.</p> <p>Last maternity leave certificate taken by Worker ID: PALM-0370 which was approved from 1 February to 1 May 2019. The mentioned worker pay-slip for the month of maternity leave were verified and confirmed that the worker was paid half of her salary and in accordance with the regulations.</p> <p>The PMU appointed Mr. Theanglay Seang (Compensation & Benefit Manager) confirmed that the management is aware of the legal requirement for the</p>	<p>Complied</p>

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	<p>returning female workers from maternity leave whereby they are given light duty for a period of two month and one-hour break per day for nursing mother.</p> <p>The contract of agreement for services of contractors and contract workers for the harvesting of FFB was available at the Estates.</p> <p>Documentation detailing the conditions of employment for the contract harvesters were clear and understood by the contractors and workers.</p>	
<p>6.5.3 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.</p> <p>Minor Compliance</p>	<p>Day-care centre was established at the line-site with adequate number of trained caregivers.</p> <p>Day-care (Estate A & B) has 24 children and Day-care (Estate C & D) has 20 children from the age of 2 – 5 years old with 2 trained caregivers at each day-care.</p> <p>The day-care is open from 6.30 am to 4.00 pm from Monday to Saturday. Light refreshment is provided by the management which consists of a pack biscuit and a box milk at no cost to the workers.</p> <p>Facilities provided were found adequate and surrounding area were secure and well maintained. The caregivers are fully employed by the PMU.</p> <p>The workers entitlement for daily rice allocation which the PMU has determined with the agreement between the workers is changed to a lump sum payment of between USD20 – USD60 per month paid at the end of each month for monthly paid workers and 3,800 riel/day at every 10 days for daily paid workers.</p> <p>The teachers are provided with additional living expenses of USD20 per month by the PMU on top of the salary provided by the authority. Accommodation is also provided if necessary. The additional living expenses were confirmed during the site tour.</p> <p>On-site clinic is maintained by trained male nurse. Basic over the counter medication is provided and first aid. Any major cases, the worker is sent to the nearest medical centre by PMU operated ambulance which is about 30 minutes away.</p> <p>Fire extinguishers were available and strategically placed at the line-sites which were inspected.</p> <p>There was evidence of rubbish collection at the all the housing / line-sites being done once a week. Verified that previous year 2018 (NC: AL-01) was addressed and effectively implemented for closure.</p>	<p>Complied</p>
<p>6.5.4 Growers and millers shall make demonstrable efforts to monitor and where able, improve workers' access to adequate, sufficient and affordable food.</p>	<p>Site tour 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.</p>	<p>Complied</p>

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<p>Minor Compliance</p>	<p>Some workers make weekly visit to the nearest town by own or private transport whenever necessary. Access to enough and affordable food is adequate.</p> <p>The respective management team conduct monthly Report Staff & Worker Stay in Accommodation. Last count was conducted in Estate A & B on 5 May 2019 to ensure the number of residents and identify of such person in the estate is monitored and documented.</p> <p>There was evidence of data analysis for general improvement of workers' health issues at the Health Dispensaries. Thus, previous year 2018 (OBS: AL-01) was addressed.</p>	
<p>Criteria 6.6 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>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>
<p>6.6.1 A published statement in local languages recognising freedom of association shall be available.</p> <p>Major Compliance</p>	<p>The PMU has established a documented social policy that recognizes freedom of association in both English and Khmer languages and is endorsed by the VP of Plantations in April 2012.</p> <p>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> <p>The established social policy is briefed and acknowledge by new hired as part of the induction process of the PMU.</p> <p>There are no migrant workers associated with the PMU and all workers are locally sourced from the surrounding villages and around the country.</p> <p>The employment of the workers is in accordance with the Labour Law 1997 of the Kingdom of Cambodia.</p>	<p>Complied</p>
<p>6.6.2 Minutes of meetings with main trade unions or workers representatives shall be documented.</p> <p>Minor Compliance</p>	<p>Interviews with staff and workers confirmed there are no trade unions.</p> <p>To ensure workers participation in the mill and estate, the following committees were established:</p> <ul style="list-style-type: none"> a) Employee Social & Gender Committee; b) OSHE Committee; and c) Main RSPO Committee. <p>The established committees conducted their meeting regularly at the respective estates and mill.</p> <p>Collective communications are held through their worker representatives under the Employee and Gender representatives' meetings which are held every 3 months.</p> <p>Interviews were conducted from two representative of the Gender Committee. The representatives are:</p>	

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	<p>Estate C: Mrs. Prom Sophea; Estate D: Mrs. Chann Vy; and confirmed that meeting is conducted regularly with the full participants of members of the estate.</p> <p>Upon further review, the representative of the Gender Committee for: Estate A: Mrs. Kun Sophany and Ms. Im Phara; Estate B: Mrs. Yan Sarath and Ms. Bun Berny.</p> <p>Based on document review, the Main RSPO Committee meeting was conducted on 24 April 2019 whereby each representative from each 3 sub-committee (OSHE Committee – Plantation, OSHE Committee Manufacturing & Social and Gender Committee) from each site is present with the PMU management team. Minutes of such meetings are maintained.</p> <p>The Gender Committee representatives from the estate were confirmed in attendance.</p> <p>Last meeting on sub-committee on Social & Gender meeting was conducted on 20 March 2019 for Estate C and 29 April 2019 for Estate D. The minute of the meeting was reviewed.</p> <p>However, non-compliance was raised as follows: Location: Estate C & D Based on document review, it was noted the meeting on Social & Gender conducted on 20 March 2019 for Estate C and 29 April 2019 for Estate D is limited to definition and policies of the PMU. The relevant objectives required for the meeting review was not discuss which includes issues of concern raised, actions and implementation of the outcome needed for follow up after the meeting.</p>	<p>2019 Major NC: EC-03</p>
<p>Criteria 6.7 Children are not employed or exploited.</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>
<p>6.7.1 There shall be documentary evidence that minimum age requirements are met.</p> <p>Major Compliance</p>	<p>The PMU has a policy of not employing child labor (persons below 18 years) in accordance with Article 181 of the Labour Law 1997 of the Kingdom of Cambodia.</p> <p>This requirement was stated in the Social Policy established by the PMU which states; We do not support forced and child labor. In line with the requirements of the Labor Law in Cambodia, the Company shall only employ persons of age 18 years and above for employment. This condition shall apply to all classes of labor, including casual and contract workers.</p> <p>The personal file of the sample workers was reviewed and confirmed that no such workers are employed by the PMU. The personal file of each worker was provided with a copy of the identification card issued by the Kingdom of Cambodia. The PMU has established a Master-list of workers for the estates and mill which has the date of birth of each worker for verification.</p>	<p>Complied</p>

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	<p>The age of new hires was verified against their birth dates in their application form and school certificates and those provided with official identification card by the authority. On site verification was conducted through interviews at the respective estates and noted that the minimum age requirements of the workers were met.</p>	
<p>Criteria 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.</p>		
Indicators	Findings and Objective Evidence	Compliance
<p>6.8.1 A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented.</p> <p>Major Compliance</p>	<p>The commitment to equal opportunities is evident in the publicly displayed Social Policy in the mill and estate notice board.</p> <p>The policy clearly states;</p> <ol style="list-style-type: none"> 1) Management shall treat all employees fairly in terms of employment, promotion, terms and conditions of work regardless of race, national origin, gender, color, sexual orientation, etc; 2) The company is committed to providing equal opportunities and freedom of association to all its employees and parties with whom it engages in its operation; 3) Compliance with enacted regulations and laws concerning social issues; 4) We are committed to adhering to prevent sexual harassment and all forms of violence against women and children. <p>The relevant policy statement has been confirmed and verified based on document review, workers interview and on-site tour.</p>	Complied
<p>6.8.2 Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against.</p> <p>Major Compliance</p>	<p>Based on interviews with both male and female workers and verification of the sample worker pay-slip, it was confirmed the implementation of equal pay for same job and no discrimination practices between male and female workers were noted during the assessment.</p> <p>Last meeting on sub-committee on Social & Gender meeting was conducted on 20 March 2019 for Estate C and 29 April 2019 for Estate D. The minute of the meeting was reviewed and no complaints on issues relating to discrimination were raised during the meeting. Further interview with the Gender Committee representatives; Mrs. Prom Sophea for Estate C and Mrs. Chann Vy for Estate D, confirmed no such complaint was noted or raised by the workers.</p>	Complied
<p>6.8.3 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>Minor Compliance</p>	<p>The Procedure OD 1; Manpower Request (Staff & Worker) and PC-GA-003 is established for the recruitment and hiring of staffs and workers. The procedure is available and maintained and noted relevant to the current operation of the PMU and estates.</p> <p>The Management has taken into consideration the needs for technical qualifications / experience and related skills during new recruitment selection, hiring and promotion</p>	Complied

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	exercises. This process was noted to be adequate and clearly stated in the procedure.	
Criteria 6.9		
There is no harassment or abuse in the work place, and reproductive rights are protected.		
Indicators	Findings and Objective Evidence	Compliance
<p>6.9.1 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>Major Compliance</p>	<p>The PMU has established Procedure 6.2.4; Sexual Harassment Procedure. The procedure was last reviewed by Core Sustainable Committee Members on 29 April 2019 and checked by Mr. Sok Chyyo, Admin Manager and Mr. Sarik Bunthoern, Admin/HR Senior Manager on 30 April 2019.</p> <p>A Social Policy was established and signed by Mr. Surat Poobankerdphol, President on 6 May 2016. The policy states MRICOP/MTSI commitment to providing work environment that is free from all forms of discrimination and conduct that can be considered harassing, coercing, or disruptive, including sexual harassment.</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 were satisfied with the present work conditions.</p> <p>Interviews with the Social & Gender Committee representative at Estate C & D and workers confirmed that briefing on harassment issue, general understanding issues such as sexual harassment, in the workplace and the mechanism to report an alleged harassment or violence were provided to them.</p> <p>Last meeting on Social & Gender meeting was conducted on 20 March 2019 for Estate C and 29 April 2019 for Estate D. The minute of the meeting was reviewed and no complaints on issues relating to sexual harassments were raised during the meeting. Further interview with the Gender Committee representatives; Mrs. Prom Sophea for Estate C and Mrs. Chann Vy for Estate D, confirmed no such complaint was noted or raised by the workers.</p> <p>Main committee meeting was conducted on 24 April 2019 whereby each representative from each committee from each site is present with the PMU management team.</p>	Complied
<p>6.9.2 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>Major Compliance</p>	<p>The policy to protect the reproductive rights and rights to have a family of the workers for women is clearly stated in the Social Policy, dated 20 June 2015 and signed by Mr. Graeme Cox, President of MRT-TCC JV in the following clauses:</p> <ol style="list-style-type: none"> 1. We have full compliance with enacted regulations and laws concerning social issues; 2. We are committed to prevent sexual harassment and all forms of violence against women and children; 	Complied

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	<p>3. The company is committed to the Human Rights of our workers and stakeholders following universal principles;</p> <p>4. We adhere to doing business in a clean and ethical way based on code of conduct. We avoid and do not condone corruption, exploitation, labor trafficking etc. This policy is communicated to all workers upon joining the company. The policy is acknowledged by the workers and interviews conducted confirmed that they are aware of such policy and if pregnant worker if known, will be given proper attention and work considerations.</p> <p>Based on document review, maternity leave certificate taken by Worker ID: PALM-0370 which was approved from 1 February to 1 May 2019. The mentioned worker pay-slip for the month of maternity leave were verified and confirmed that the worker was paid half of her salary and in accordance with the regulations.</p>	
<p>6.9.3 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>Minor Compliance</p>	<p>The PMU has established Procedure SOP-GA-019; Compliant/Grievance where it states the company's commitment to manage grievance among employees or stakeholder is implemented.</p> <p>This policy is communicated to all workers upon joining the company. The policy is acknowledged by the workers and interviews conducted confirmed that they are aware of such policy.</p> <p>Suggestion/Complaint boxes are maintained and available in front of the respective Mill & Estate offices. The boxes are inspected monthly by the respective Mill & Estate management team. Feedback from workers were obtained in meeting sessions held on quarterly basis for 2018-2019. Thus, previous year, 2018 OBS: AL-02 was addressed.</p> <p>There has been no disputes and whistle blowing incident reported for the previous year.</p>	<p>Complied</p>
<p>Criteria 6.10 Growers and millers deal fairly and transparently with smallholders and other local businesses.</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>
<p>6.10.1 Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available.</p> <p>Minor Compliance</p>	<p>It is verified that there has been no supply or purchases of any FFB from any external growers. Thus, this is not applicable.</p>	<p>Not applicable</p>
<p>6.10.2 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>Major Compliance</p>	<p>It is verified that there has been no supply or purchases of any FFB from any external growers. Thus, this is not applicable.</p>	<p>Not applicable</p>
<p>6.10.3 Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.</p>	<p>The PMU has established Procedure: SOP-GA-025, effective 29 April 2017; Code of Ethical Conduct and Respecting Human Rights. The procedure states the PMU to developing an organizational culture that will exhibit the highest standard of ethical conduct and</p>	<p>Complied</p>

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<p>Minor Compliance</p>	<p>respect human rights, equality and fairness through the following:</p> <ol style="list-style-type: none"> 1. To respect a fair conduct of business; 2. To ensure prohibition of all forms of corruption, bribery and fraudulent use of funds and resources; 3. To provide proper disclosure of information in accordance with applicable regulations; 4. To ensure protection of the confidentiality of company's and our associates' information to safeguard against unauthorized disclosure of important information that is not in the best interest of the company; 5. To respect and protect the fundamental human rights, as stated in the Universal Declaration of Human Rights of the UN, as well as the dignity of the individuals working in all levels of operation including contracted third parties. Further stated in detail in clause 4.7 <p>This procedure is an integrated procedure that provides guidance to the top management and workers in the day-to-day operation of the company, including dealing with customer, suppliers, shareholders and business associates.</p> <p>Based on employee contracts and meeting minutes (between PMU managements and workers), it is evident that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.</p> <p>Interviews with parties concerned confirmed that business practices with local businesses are conducted in a fair and transparent manner.</p> <p>The contractors are monitored during work in progress to follow safety requirements.</p>	
<p>6.10.4 Agreed payments shall be made in a timely manner.</p> <p>Minor Compliance</p>	<p>Based on interviews with the contractors during the stakeholder meeting, they reported that payments are received in timely manner and they have not encountered any problems with payment so far.</p> <p>The commitment is further stated in the PMU's Social Policy which states "We adhere to doing business in a clean and ethical way based on code of conduct. We avoid and do not condone corruption, exploitation, labor trafficking etc."</p> <p>Based on document review, the following record on payment to vendor were reviewed:</p> <p>Estate B;</p> <ol style="list-style-type: none"> 1. Agreement MR20190011 dated 23 Jan 2019 for labour for circle sanitation in Division B4; 2. Agreement MR20190008 dated 23 Jan 2019 for labour for pruning in Division B4; the payment is based on completion of specific hectare. Agreement sighted with both parties in agreement; 	<p>Complied</p>

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	<p>3. Agreement MR20190039 dated 26 April 2019 for fertilizer transport; which payment is based on completion delivery of every 150 mt.</p> <p>Estate C; 1. Contract agreement for FFB harvesting dated 1 Jan 2019 for one year with PMU;</p> <p>Estate D; 1. Agreement 10008 dated 21 Jan 2019 for circle weeding; 2. Agreement 10009 dated 21 Jan 2019 for pruning;</p> <p>The payment is based on completion of specific hectare. Agreement sighted with both parties in agreement.</p> <p>Payment vouchers were verified, and payment was made within two weeks after verification by the respective estates.</p>	
<p>Criteria 6.11 Growers and millers contribute to local sustainable development where appropriate.</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>
<p>6.11.1 Contributions to local development that are based on the results of consultation with local communities shall be demonstrated.</p> <p>Minor Compliance</p>	<p>Contributions to local development are based on the results of consultation with local communities as documented in the updated SIA for year 2018.</p> <p>The following are the social, local development and contributions planned and progressively completed:</p> <ol style="list-style-type: none"> 1. Repair of stretches of laterite road for villagers in the vicinity of the PMU. 2. Assisting the villagers in the vicinity of the PMU with transportation for burial ceremony. 3. Permission to nearby villages to use the landfill to manage their domestic waste 4. Free provision of 50 kg of rice and 200 litres of diesel per month to the Anlong Kropeu temple. 5. Provision of free regular food to extremely poor villagers. 6. Progressive completion of electricity supply from main grid to workers housing quarters. 7. Organising of community rubbish clean up at housing and shop areas. 8. Providing big rubbish bins at strategic points and ongoing briefings to local community to keep environment clean. <p>Verification on the mentioned contributions were during the site assessment, interviewed with the communities and during the stakeholders meeting held during the assessment.</p>	<p>Complied</p>
<p>6.11.2 Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity.</p> <p>Minor Compliance</p>	<p>It was verified that there was no smallholder scheme program at the PMU.</p>	<p>Not applicable</p>
<p>Criteria 6.12 No forms of forced or trafficked labour are used.</p>		

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Indicators	Findings and Objective Evidence	Compliance
<p>6.12.1 There shall be evidence that no forms of forced or trafficked labour are used.</p> <p>Major Compliance</p>	<p>The employment contracts maintained at the estate offices confirmed that all workers were recruited in accordance with the legal requirements of the Labour Law 1997 of the Kingdom of Cambodia.</p> <p>The appointment on the recruitment of worker was verified (Worker ID: CR-001379, joined on 9 March 2019) and noted in compliance with the established procedure.</p> <p>Furthermore, the PMU's Social Policy established the commitment to be implemented by the PMU to ensure no forms of forced or trafficked labour are to be used.</p> <p>The workers are mainly from the neighbouring villages within the province of Sihanouk. Interviews with field workers confirmed that were no forced or trafficked labour.</p> <p>Mill workers confirmed that they could opt not to do over-time work if so desired.</p> <p>The PMU has no foreign workers and all workers are locally hired workers from neighbouring villages or provinces in Cambodia.</p> <p>It was further verified during the site assessment and interview with the management team.</p>	<p>Complied</p>
<p>6.12.2 Where applicable, it shall be demonstrated that no contract substitution has occurred.</p> <p>Minor Compliance</p>	<p>There was no evidence of contract substitution and this was confirmed from interviews with workers and management team.</p>	<p>Complied</p>
<p>6.12.3 Where temporary or foreign workers are employed, a special labour policy and procedures shall be established and implemented.</p> <p>Major Compliance</p>	<p>There is no requirement for any special labour policy as no foreign workers are employed.</p>	<p>Not applicable</p>
<p>Criteria 6.13 Growers and millers respect human rights.</p>		
Indicators	Findings and Objective Evidence	Compliance
<p>6.13.1 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>Major Compliance</p>	<p>The PMU has established Social Policy, dated 20 June 2015 and signed by Mr. Graeme Cox, President of MRT-TCC JV in the following clauses: The company is committed to the Human Rights of our workers and stakeholders following universal principles.</p> <p>The documented policy stating human rights and ethical conduct and integrity established and was communicated to all workers.</p> <p>This policy is communicated to all workers upon joining the company by the respective estates and mill. The policy is acknowledged by the workers and interviews conducted confirmed that they are aware of such policy.</p> <p>Furthermore, the PMU has also established Procedure: SOP-GA-025, effective 29 April 2017; Code of Ethical</p>	<p>Complied</p>

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	<p>Conduct and Respecting Human Rights. The procedure states the PMU to developing an organizational culture that will exhibit the highest standard of ethical conduct and respect human rights, equality and fairness through the following:</p> <ol style="list-style-type: none"> 1. To respect a fair conduct of business; 2. To ensure prohibition of all forms of corruption, bribery and fraudulent use of funds and resources; 3. To provide proper disclosure of information in accordance with applicable regulations; 4. To ensure protection of the confidentiality of company's and our associates' information to safeguard against unauthorized disclosure of important information that is not in the best interest of the company; 5. To respect and protect the fundamental human rights, as stated in the Universal Declaration of Human Rights of the UN, as well as the dignity of the individuals working in all levels of operation including contracted third parties. Further stated in detail in clause 4.7 <p>This procedure is an integrated procedure that provides guidance to the top management and workers in the day-to-day operation of the company, including dealing with customer, suppliers, shareholders and business associates.</p>	
<p>6.13.2 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>Minor Compliance</p>	<p>All local children are 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.</p> <p>Interviews done with primary school heads confirmed that the students come from the estates and mills and school attendance and performance is monitored.</p> <p>No foreign workers children are present during the assessment as the PMU has no foreign workers and all workers are locally hired workers from neighbouring villages or provinces in Cambodia.</p>	<p>Complied</p>

Principle 7: Responsible development of new plantings

Todate the PMU has not carried any new plantings after Nov 2005 which may be applicable under requirements of the RSPO New Planting Procedure.

The requirements of Principle 7 were verified to be 'Not applicable' to this PMU during this assessment.

It was verified during current on-site assessment that the PMU has declared and submitted its Land Use Change details for analysis for its plantings since Nov 2005 as per the calculations specified in the RSPO PalmGHG Version 3.0.1. The record of submission made to the RSPO Secretariat for the current year was done on 18 Apr 2019.

See Summary of Net GHG Emissions submitted by MRICOP Group POMs in the Tables below.

Based on the details provided in the record of submission, it is also verified that there is no potential liability under the RSPO Remediation and Compensation Procedure at this PMU.

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SUMMARY OF NET GHG EMISSIONS

All information and data below as submitted by MRICOP was verified against the retrieved summary report generated through ***PalmGHG Calculator Version 3.0.1.***

GHG Table 1: Summary of Net GHG Emissions (Period: Sept 2017- Aug 2018)

Emissions per Product	tCO ₂ e/tProduct
CPO	1.05
PK	1.05

Production	t/year
FFB processed	243,756.92
CPO Produced	48,024.99

Extraction	%
OER	19.70
KER	4.36

GHG Table 2: Summary of Land Use

Land use	ha
OP planted area	16,555.61
OP planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	3,199.36
Total	19,754.97

GHG Table 3: Summary of Field Emissions and Sinks

	Own Crop Monorum POM		Own Crop Anlong Kropeu POM		3rd Party		Total Group MRICOP Mills	
	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e	tCO ₂ e/ha
Emissions								
Land Conversion	0	0	0	0	0	0	0	0
CO ₂ Emissions from Fertiliser	9,086.51	1.2	6,679.98	1.2	0	0	15,765.49	2.4
N ₂ O Emissions	7,629.68	1	4,907.30	0.88	0	0	12,536.98	1.88
Fuel Consumption	1,187.17	0.16	756.31	0.13	0	0	1,943.48	0.29
Peat Oxidation	0	0	0	0	0	0	0	0
Sinks					0	0		

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Crop Sequestration	0	0	0	0	0	0	0	0
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	17,903.36	2.36	12,343.59	2.21	0	0	30,246.95	4.57

GHG Table 4a: Summary of Mill Emissions and Credits

	tCO ₂ e	tCo ₂ e/tFFB
Emissions		
POME	8,334.84	0.04
Fuel Consumption	522.27	0
Grid Electricity Utilisation	0	0
Credits		
Export of Excess Electricity to Grid and Housing	-162.01	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	8,695.10	0.05

GHG Table 4b: Palm Oil Mill Effluent (POME) Treatment

Divert to compost	0%
Divert to anaerobic digestion	100%

GHG Table 4c: POME Diverted to Anaerobic Digestion

Divert to anaerobic pond	100%
Divert to methane capture (flaring)	0%
Divert to methane capture (electricity generation)	0%

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

Criteria 8.1 Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.		
Indicators	Findings and Objective Evidence	Compliance
<p>8.1.1 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"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); • Encourage optimising the yield of the supply base. <p>Major Compliance</p>	<p>Continual Improvement Plans established, implemented and monitored for the Mills and Estates include the following:</p> <p><u>Monorum POM</u></p> <ol style="list-style-type: none"> 1. Increase raw water for mill processing during the long dry season by increasing the depth of water reservoir area for water storage to 135,000 m³. <p><u>Anlong Kropeu POM</u></p> <ol style="list-style-type: none"> 1. Improvement of Effluent Treatment Plant (ETP) – reactivation of anaerobic ponds 1 & 2. 2. Construction of drains and bunds to channel mill waste to ETP at location of fiber and decanter. 3. Construct oil trap at designated locations around the mill, 4. Installation of emission monitoring of stack of boiler. boiler smoke emission sampling and testing. 5. Electricity supply from the mill to Estate C accommodation. 6. Increase raw water for mill processing during the long dry season by increasing the depth of water reservoir area for water storage to 800,000 m³ <p><u>Estates A, B, C & D</u></p> <ol style="list-style-type: none"> 1. Reduction in use of certain chemicals (glyphosate) by alternative means: <ul style="list-style-type: none"> - use of manual / roto slashings to reduce weeds, - no application of agro-chemicals during rainy season, - calibration of spraying equipment, - training workers carrying out spraying work, - enhancement of IPM program, 2. Environment impacts <ul style="list-style-type: none"> - improve signage and maintain river riparian and buffer zone. 3. Waste reduction – recycling and minimizing <ul style="list-style-type: none"> - improve the disposal of domestic waste, - improve the disposal of empty chemical containers, empty fertilizer bags and used planting bags, <p>Continual improvements with social impact include the following:</p> <ol style="list-style-type: none"> 1. Snake bite / First Aid Awareness Training for local community. 2. Annual Refresher Training on OSH / First Aid by Nursing assistants for workers and community. 3. Free transport for children to and from schools located in villages nearby the PMU. 4. Improved learning facilities at the Day Care Centre on proper wildlife posters and TV shows. 5. Planting of Napier grass at boundaries of estates for grazing by cattle/buffalo from the villages. 6. Repairing the damages on rural schools as well as 	<p>Complied</p>

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	<p>building new teachers' quarters.</p> <p>7. Socialization with academic institutes and other interested organizations on the oil palm plantation operations and palm oil processing. In year 2018 to date, visits from 3 institutes/organizations were recorded with overall positive feedback on the PMU.</p> <p>Other social impacts:</p> <p>Based on management interviews and audit verification done, it was noted that a living expenses allowance of USD 20 per month was provided to the 45 teachers which cater for the workers' children in 8 schools (in vicinity of the PMU). This is an additional allowance on top of the salary provided by the government.</p> <p>Living expenses allowance was confirmed provided by the PMU during the interview with the teachers from Anlong Kropeu and Tapoa Poem Village schools.</p> <p>It was further confirmed that living quarters are provided by the PMU and a new living quarters were built at Anlong Kropeu school. School facilities such as classroom tables, toilets, grass cutting, and general maintenance were assisted by the PMU</p>	
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3.1.1 Supply Chain Certification Standards Findings - on CPO Mill

The Supply Chain model applied at the two (2) CPO mills at MRICOP during this assessment is:
Module D – CPO Mills: Identity Preserved (IP).

Details of findings are as follows:

General Chain of Custody Requirements for the supply chain:

5.1 Applicability of the general chain of custody requirements for the supply chain		
Indicators	Findings and Objective Evidence	Compliance
<p>5.1.1.</p> <p>The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors.</p> <p>After the end product manufacturer, there is no further requirement for certification.</p>	<p>CPO Mills</p> <p>1) Monorum (under MRICOP)</p> <p>2) Anlong Kropeu (under JV MTCC-MTSI)</p> <p>takes legal ownership and physically handles the certified FFB, CPO and PK.</p> <p>Verified as at todate, no outsourced contractor / facility is used in the processing and production of the CPO and PK.</p>	Complied
<p>5.1.2.</p> <p>Traders and distributors require a license obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor must pass on the certification number of the product manufacturer and the applicable supply chain model.</p>	Not applicable as the above are CPO Mills.	Not applicable

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<p>5.1.3. Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.</p>	<p>RSPO membership is registered under the parent company: MONG RETHTHY INVESTMENT CAMBODIA OIL PALM CO. LTD. (MRICOP) RSPO Membership No: 1-0109-11-000-00</p> <p>Member units registered in the RSPO PalmTrace are as follows: 1. Member Name: Mong Reththy Investment Cambodia Oil Palm Co., Ltd. – Monorum Palm Oil Mill Member ID: RSPO_PO1000000223 License ID: CB72455</p> <p>2. Member Name: MRICOP Anlong Kropeu Palm Oil Mill Member ID: RSPO_PO1000003115 License ID: CB72453</p>	<p>Complied</p>
<p>5.1.4. Processing aids do not need to be included within an organization's scope of certification.</p>	<p>No processing aid used as the processing facility are CPO Mills.</p>	<p>Complied</p>
<p>5.2 Supply chain model</p>		
<p>5.2.1 The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.</p>	<p>Verified that both processing facilities are CPO Mills which applied Module D: Identity Preserved (IP). The FFB are from 4 estates shared in common by both the CPO Mills.</p>	<p>Complied</p>
<p>5.2.2. The site can use one (1) or a combination of supply chain models as audited and certified by the CB.</p>	<p>Verified that the CPO Mills are applying Module D: Identity Preserved (IP) only.</p>	<p>Complied</p>
<p>5.3 Documented procedures</p>		
<p>5.3.1. The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 	<p>Documented procedure for IP Module is SC-033 Rev No. 4 (05 Jul 2017) The procedure covered the implementation of all elements of IP Model. The 'IP module' implementation is verified to be following the RSPO SCCS requirement.</p> <p>Production records are maintained and updated on daily and weekly basis. Monthly and 3 -monthly and annually reports are compiled and reported to the MRT-TCC (JV) Head Office at Phnom Penh.</p> <p>The responsible person identified is the respective Mill Managers as per the SOP and Organizational chart. Interview done with the Mill Managers:</p>	<p>Complied (Refer to 5.3.2 NC: AL-01)</p>

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<ul style="list-style-type: none"> • Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization's procedures for the implementation of this standard. 	<p>The respective Mill Managers: Mr. Panuschai Paochang (for AK POM) & Mr. Mohd Zainul Wafa (for Monorum POM) confirmed that the Mill Managers and assistants are aware and able to demonstrate the implementation of the RSPO supply chain requirements.</p>	
<p>5.3.2. The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <ul style="list-style-type: none"> i. conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. ii. effectively implements and maintains the standard requirements within its organization. <p>Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct nonconformities shall be subject to management review at least annually. The organization must be able to maintain the internal audit records and reports.</p>	<p>Noncompliance finding as follows: Documented SOP for SCC was not updated for changes in RSPO Market communications and claims (revised wef 1 Jan 2019). Checklist as per the RSPO SCC Standard 2017 which included the RSPO Market communication and claims requirements (rev 1 Jan 2019) has not been used.</p> <p>SOP had covered the implementation of all elements of Supply chain modules which included the Market Communications and Claims requirements on:</p> <ol style="list-style-type: none"> 1) General corporate communications 2) Business to business communications 3) Business to consumer communication 4) Stamp CSPO/IP or CSPK/IP 5) IP general & Module D: IP for CPO Mill 6) Labelling and trademark 7) Messaging <p>Internal audits done twice (2) annually i.e. 7-12 May 2018 and 21-27 Dec 2018. Last Internal audit was done on: 21-27 Dec 2018.</p> <p>Audit team comprise: Lead Auditor - Lay Rithy, Khiev Sothy Auditors - Hel Vichheka, Ith Puthy, Heng Sukhoeum, Noun Virak, Ms. Kristiana Thong Noted 3 new Internal Auditors in training (OTJ)</p> <p>Findings on POM SCC: 1 finding and 19 findings on Estates (A-D). The last internal audit indicated NCs raised which were followed up for closure after corrective actions taken.</p> <p>The Internal audit findings were reviewed during the management review conducted on: 21 Jan 2019.</p> <p>The management review minutes was attended by Management representatives from HQ, key Site personnel from the PMU. Attended by 9 Management personnel (headed by Sunchai Choongan, Deputy MD)</p> <p>Records of Internal audits and minutes of Management review of past 2 years were maintained and available.</p>	<p>2019: Major NC:AL-01</p>
<p>5.4 Purchasing and goods in</p>		

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<p>5.4.1.</p> <p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment / delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number • Information must be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). • The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping announcements/ Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance. • A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements. • The validity of license for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements/announcements. 	<p>The Daily Production Report showed traceable figures of certified products from certified raw material sources. All incoming certified raw material is recorded by daily, monthly and annual basis. Incoming raw material indicating: name and address of the product origin, name and address of the receiver; ticket number, delivery order no.; contract no.; date; quantity; transporter; type of product; Supply Chain model used - IP and RSPO certificate number. Incoming FFB from supply base are entirely from owned estates only.</p> <p><u>1) At Monorum – POM</u> POM & Estates Contract No: NA (Internal company) Quantity: All delivered FFB Period: 1 Aug 2018 – 30 Apr 2019</p> <p>Delivery Notes under MRICOP / MTSI Delivery Notes nos: 018783 – 043138 WB ticket nos: 011651- 023412 Net weight: 2120 - 4240 kg (Range from 2000 – 8000 kgs) Origin: Estates A, B, C & D Address: Cambodia Country of origin: Cambodia Receiver: Monorum POM Product: FFB – RSPO / IP Certified RSPO Cert no: RSPO 928088</p> <p><u>2) At Anlong K - POM</u> POM & Estates Contract No: NA (Internal company) Quantity: All delivered FFB Period: 1 Aug 2018 – 30 Apr 2019</p> <p>Delivery Notes under MRICOP / MTSI Delivery Notes nos: 019783 – 065266 WB ticket nos: 0091- 4389 Net weight: 2430 - 7840 kg (Range from 2000 – 8000 kgs) Origin: Estates A, B, C & D Address: Cambodia Country of origin: Cambodia Receiver: Anlong K – POM Product: FFB – RSPO / IP Certified RSPO Cert no: RSPO 928088</p>	<p align="center">Complied</p>
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<p>5.4.2. The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	<p>As per the SOP available at the POM for the IP based incoming FFB and documentations and handling of non-conforming palm products such as quality and document issues. Estates Delivery Notes and Weighbridge tickets at POM, the control mechanism noted to be in order. So far, there was no evidence of any occurrence of non-conformance on related documents.</p>	<p>Complied</p>
<p>5.5 Outsourcing activities</p>		
<p>5.5.1. In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mill cannot outsource processing activities like refining or crushing. This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p>	<p>Verified that there are no outsourced processing activities to Independent third parties. Transport of FFB, CPO and PK as arranged by the Estates and POM Management are controlled via contracts with transporters and inspection of the transportation vehicles used prior to and upon completion of loading and off-loading. This are evidenced in the Delivery chits and weighbridge tickets which indicate the transport vehicle no, weight and driver involved. No external storage is used for CPO and PK deliveries from Mills.</p>	<p>Complied</p>
<p>5.5.2. Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: a) The site has legal ownership of all input material to be included in outsourced processes; b) The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all</p>	<p>No outsourcing of processing activities noted at the POM.</p>	<p>Not applicable</p>

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information, when this is announced in advance.		
<p>5.5.3. The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.</p>	<p>Transport contractors – 3 nos, for the transportation of the CSPO & CSPK are identified in the Approved Vendor list and is monitored. Valid contracts are available and verified at the POMs.</p>	<p style="text-align: center;">Complied</p>
<p>5.5.4. The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.</p>	<p>No new contractor used for the physical handling of CSPO & CSPK.</p>	<p style="text-align: center;">Complied</p>
<p>5.6 Sales and goods out</p>		
<p>5.6.1. The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer;</p> <ul style="list-style-type: none"> • The name and address of the seller; • The loading or shipment / delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number. • Information must be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). • For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance. 	<p><u>At supplier: Anlong Kropeu Mill</u> Period: Aug 2018 – Apr 2019</p> <p><u>Sampled Contract:</u> Contract No: PFT-005-2019 (10 Jan 2019) Seller: MRICOP, Cambodia Buyer: Pro Fair-Trade AG, Switzerland Qty: 220.00 MT+/- 5% Packed: ISO Tank Specs: FFA: 4.25% max, M&I: 0.20 max DOBI: 2.20 min Mineral Oil content:<50 ppm</p> <p><u>Sampled - Outgoing product - CSPO:</u></p> <ul style="list-style-type: none"> - Origin: Anlong K- POM - Country of origin: Cambodia - Buyer / Recipient: Pro Fair-Trade AG - Address: Lenttenstrasse 7, CH-6343, Rotkreuz, Switzerland - WB ticket nos: 004321 - Date: 10 Mar 2019 - Product: CPO / IP - Quantity: 28,310 kg - RSPO Cert no: RSPO 928088 <p>Shipping documents include: Commercial Invoice, Packing List, Bill of Lading Certificate of Origin (GSP Form A)</p> <p><u>Sampled - Outgoing product - CSPK:</u> Sampled: Contract No: OF-002-10-18 (15 Oct 2018) Seller: MRICOP, Cambodia Buyer: Oils & Fats Packers Rotterdam B.V Qty: 400.00 MT+/- 5% (297 USD PMT) Packed: Bulk Specs: FFA – 5 % max, Dirt + Shell: 6 % max Moisture - 7 % max</p> <ul style="list-style-type: none"> - WB ticket nos: 00301 - Date: 2 Nov 2018 - Product: CSPK / IP 	<p style="text-align: center;">Complied</p>

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	<p>- Quantity: 30,120 kg - RSPO Cert no: RSPO 928088 Shipping documents include: Commercial Invoice Packing List, Bill of Lading, Fumigation Cert Phytosanitary Cert, Certificate of Origin (GSP Form A)</p> <p>At supplier: Monorum Mill Period: Aug 2018 – Apr 2019 CPO and PK produced were sold as 'Conventional' only.</p>	
<p>5.7 Registration of transactions</p>		
<p>5.7.1. Supply chain actors who:</p> <ul style="list-style-type: none"> • are mills, traders, crushers and refineries; and • take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. 	<p>Legal ownership and physically handling of the RSPO CSPO & CSPK is confirmed for the past 12 months. Records for the transactions made from the POM as sold to the buyer /recipient are confirmed to be appropriately maintained.</p> <p>Member units registered in the RSPO PalmTrace are as follows:</p> <p>1. Palm Trace Member Name: Mong Reththy Investment Cambodia Oil Palm Co., Ltd. – Monorum Palm Oil Mill Member ID: RSPO_PO1000000223 License ID: CB72455</p> <p>2. Palm Trace Member Name: MRICOP Anlong Kropeu Palm Oil Mill Member ID: RSPO_PO1000003115 License ID: CB72453</p> <p>Verified above details are identified during certified products trading.</p>	<p>Complied</p>
<p>5.7.2. The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> • Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. • Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability 	<p>The company has registered their transactions as per the Palm trace.</p> <p>Sampled - CSPO transaction: Shipping Announcement: xxx stated Transaction ID: stated Seller: MRICOP, Cambodia – Anlong Kropeu Mill Buyer: xxx stated Product: CSPO Supply chain model: IP Quantity: stated Transaction type: Shipping Status: Confirmed Period: Jan - Mar 2019</p> <p>Sampled - CSPK transaction: Shipping Announcement: xxx stated Transaction ID: stated Seller: MRICOP, Cambodia - Anlong Kropeu Mill Buyer: xxx stated Product: CSPK</p>	<p>Complied</p>

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<p>number. Tracing can be done in a consolidated way at least annually.</p> <ul style="list-style-type: none"> • Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. • Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 	<p>Supply chain model: IP Quantity: stated Transaction type: Shipping Status: Confirmed Period: Oct - Dec 2018</p> <p>Verified that Announcements were made for transactions under: Seller: MRICOP, Cambodia - Anlong Kropeu Mill</p> <p>No transactions or announcements made for: Seller: MRICOP, Cambodia - Monorum Mill</p>	
<p>5.8.1. The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.</p>	<p>The POM has an annual Training 2018 /2019, which includes refresher training on the RSPO SCCS. Training records are updated for personnel which includes attendance list and photograph as evidence are verified and available.</p>	Complied
<p>5.8.2. Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.</p>	<p>The last training was done on 4 Jan 2019, attended 6 participants which included the Mill Managers, Executives, Assistants, Weighbridge clerks who are involved in implementation of the RSPO SCCS.</p> <p>Location: Palm Oil Mills – Office There is inadequate knowledge and awareness of the revised RSPO SCC (July 2017) and the latest RSPO Market Communications and Claims document (version 1 Jan 2019) by personnel involved in the implementation of the RSPO SCC.</p> <p>New mill personnel and Internal auditors are not adequately given training and/or refresher training on the identification and monitoring needed on documentations for transactions of RSPO Certified products.</p>	2019 Major: NC: AL-02
5.9 Record keeping		
<p>5.9.1. The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.</p>	<p>The company has procedure to maintain and update all documents and records of RSPO supply chain system as required by the RSPO supply chain. The company has maintained, updated report & record which covering all aspects of RSPO SCCS requirements, such as: daily report, monthly report, 3-months mass balance report, delivery note, balancing stock report, complaint record, non-conforming product report, etc.</p>	Complied
<p>5.9.2. Retention times for all records and reports shall be a minimum of two (2) years and must comply with legal and regulatory requirements and be able to confirm the</p>	<p>As per the RSPO SCC SOP, the minimum retention time of record for 2 years was stated. The retention of accounting related records including contracts, invoices etc. had complied with the minimum 7 years as per the Annual Accounting</p>	Complied

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certified status of raw materials or products held in stock.	report and Stock Inventory done by the Accounting Dept. Based on sampling done for RSPO transactions, the related records were noted to be retained and available at site.	
5.9.3. The organization must be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	The PMU has updated the record keeping of the volumes of FFB purchased, processed and claimed as RSPO certified oil palm products. The Monthly, 3- Monthly, and Annual data over past 12 months was available.	Complied
5.10 Conversion factors		
5.10.1 Where applicable a conversion rate must be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which must be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.	Not applicable, as the scope of certification for this unit covers until the CPO Mill only.	Not applicable
5.10.2 Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	Not applicable, as the scope of certification for this unit covers until the CPO Mill only.	Not applicable
5.11 Claim		
5.11.1. The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	As at to-date, there has been no evidence of any no incorrect or inappropriate claims made at this unit.	Complied
RSPO Rules on Market Communications and Claims:		
General Corporate communications		
4.1 Highlights RSPO membership and/or commitment to RSPO Principles	The RSPO membership number is stated under the parent company: MONG RETHTHY INVESTMENT CAMBODIA OIL PALM CO. LTD. (MRICOP) RSPO Membership No: 1-0109-11-000-00 as indicated in the RSPO website and CH certificate.	Complied
4.2 a) displays RSPO membership number	Noted done via the ACOP submitted on annual basis - Year 2017 and 2018 sighted.	Complied

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b) displays RSPO web address (www.rspo.org.) c) states support for RSPO work		
4.3 No misleading claim on RSPO membership on sale of certified RSPO products	There has been no evidence of any misleading claim as at the time of audit on the sale of the CSPO & CSPK for past 12 months (till Mar 2019)	Complied
4.4 No misleading claim to consumers and stakeholders.	As above.	Complied
4.5 Use of RSPO logo	No evidence of inappropriate use of the RSPO logo.	Complied
Business to Business communications		
5.1 Appropriate communications for B to B	Communications made between Seller: POM (seller) and Buyer are confirmed appropriate.	Complied
5.2 Communication of claims of SCC Model and Certificates	Verified that claims using the IP model / status as issued in the CH certificate was correctly stated.	Complied
5.3 Distributor or wholesaler License use	Not applicable as the POM is not a distributor / wholesaler.	Not applicable
5.4 Declarations of certified palm oil are as per RSPO rules.	Verified that declarations and claims made on CSPO & CSPK are as per RSPO Rules.	Complied
Business to Consumer communications		
6.1 Any business to consumer claims made?	Not applicable as the POM does not make any communications with consumers.	Not applicable
6.2 Are the RSPO Marks and logos appropriately used and communicated.	Not applicable.	Complied
6.3 On-pack label and claim use	Not applicable.	Not applicable
6.4 Any disclosure of supplier membership status	Not applicable.	Not applicable
6.5 Appropriate and accurate claims made on certified products	Verified that transaction and claims on certified CSPO & CSPK are appropriate and accurate over past 12 months.	Complied
6.6 Use of RSPO Marks and logos	Verified that there was no inappropriate use of RSPO Marks & Logos.	Complied
6.7 Retailer or Food Services company use of RSPO Marks and logos	Not applicable.	Not applicable
6.8 Appropriate and accurate claims made on certified products under 6.7	As above	Not applicable
5.12 Complaints		
5.12.1. The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	Documented procedure for IP Module is SC-033 Rev No. 4 (05 Jul 2017) The procedure covered the implementation of all elements of IP Model. The 'IP module' implementation is verified to be following the RSPO SCCS requirement included the collecting and resolving of stakeholder complaints and any quality issues. There has been no complaint received since previous audit.	Complied

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5.13 Management review		
<p>5.13.1. The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken</p>	<p>Management review is planned on an annual basis. The last management review was done on: The Internal audit findings were reviewed during the management review conducted on: 21 Jan 2019.</p> <p>The management review minutes was attended by Management representatives from HQ, key Site personnel from the PMU. Attended by 9 Management personnel headed by Sunchai Choongan – Deputy MD.</p> <p>Records of Internal audits and minutes of Management review of past 2 years were maintained and available.</p>	Complied
<p>5.13.2. The input to management review shall include information on:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	<p>Minutes meeting of management review has included all the required inputs. Review of inputs had covered the both the internal audit findings and results. Review of corrective and preventive actions and the follow up actions from customer feedbacks, previous management review and changes that could affect the management system were minuted.</p>	Complied
<p>5.13.3. The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	<p>Outputs of management review has included recommendations for improvement such as: Planning for training needed for the related new personnel on RSPO requirements including RSPO Supply Chain on over the next 12 months.</p>	Complied

RSPO Supply chain requirements – Module D (IP) for CPO Mill

D.1 Definition		
Indicators	Findings and Objective Evidence	Compliance
<p>D.1.1 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&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</p>	<p>Two (2) CPO mills under the MRICOP Grouping; 1) Monorum POM (old mill) and 2) Anlong Kropeu POM (new mill)</p> <p>Verified to only process FFB from their common supply base, i.e. the 4 estates A, B, C and D (see Section 1.3).</p> <p>It was verified that there were no sources of FFB from any outgrowers or independent suppliers / smallholders.</p>	Complied

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certified land base. If a mill processes certified and uncertified FFB without physically separating the material then only Module E is applicable.	The two CPO Mills under the MRICOP Grouping are therefore applying the Identity Preserved (IP) model.	
D.2 Explanation		
Indicators	Findings and Objective Evidence	Compliance
D.2.1 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&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.	The estimated tonnage of CPO and PK products that could potentially be produced by the POM is recorded in this Assessment 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 has been recorded in each assessment report (see Section 1.8.3 Tables 7A & 7B).	Complied
D.2.2 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).	Both the Mills 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). Refer to SCC 5.1 – 5.12 findings – General requirements, as audited above.	Complied
D.3 Documented procedures		
D.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:	Documented procedure for IP Module is SC-033 Rev No. 4 (05 Jul 2017) The procedure covered the implementation of all elements of IP Model. The 'IP module' implementation is verified to be following the RSPO SCCS requirement.	Complied
a) Complete and up to date procedures covering the implementation of all the elements in these requirements	The documented procedure and its implementation confirmed to have complied with all the specified requirements of Identity Preserved (IP) Model D that include controlling the FFB receipt, processing, sales, CPO and PK dispatch, and records keeping. Production records are maintained and updated on daily and weekly basis. Monthly and 3 -monthly and annually reports are compiled and reported to the MRT-TCC (JV) Head Office at Phnom Penh.	(Refer to 5.3.2 NC:AL-01)
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.	The responsible persons identified are the respective Mill Managers as per the SOP and Organizational chart. Interview done with the Mill Managers: The respective Mill Managers: Mr. Panuschai Paochang (for Anlong K POM) & Mr. Mohd Zainul Wafa (for Monorum POM) confirmed that the Mill Managers and assistants are aware and able to demonstrate the implementation of the RSPO supply chain requirements.	Complied

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<p>D.3.2 The facility shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	<p>For the year 2018/2019, the POMs received and processed FFB from the 4 estates only. Verified that the POMs did not receive any non-certified FFB from other sources or suppliers. All supplies of FFB were subjected to verification of documents and quality and documentation checks by weighbridge personnel.</p>	<p>Complied</p>
<p>D.4 Purchasing and goods in</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>
<p>D.4.1 The facility shall verify and document the tonnages and sources of certified and non-certified FFBs received.</p>	<p>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.</p>	<p>Complied</p>
<p>D.4.2 The facility shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p>	<p>Both mills monitor all FFB received, CPO and PK production. The PMU has an internal monitoring and reporting mechanism for advising the CB of production variations such as projected overproduction situation, when such issue arises. So far, there is no projected overproduction.</p>	<p>Complied</p>
<p>D.5 Record keeping</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>
<p>D.5.1 The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.</p>	<p>The records and reports are available from the computerized system. Also, hard copies of records and reports are properly filed and readily accessible. Inspection of records and reports at the mills confirmed these were accurate, complete and updated daily. As per the SOP, the records and reports are archived and stored in the Mill Office for a minimum period of 5 years. The weighbridge tickets for delivery of CPO and PK indicated the products as certified IP Model for the Monorum POM and Anlong Kropeu POM. 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>	<p>Complied</p>
<p>D.6 Processing</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>
<p>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.</p>	<p>Confirmed from records that the mills only received and processed certified FFB from its own estates. The processing facilities have established and implemented a clear procedure and mechanism for the IP model. Review and on-site verification confirmed that the mechanism was implemented and in compliance with the module requirements at the both mills, including transport and storage.</p>	<p>Complied</p>

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D.6.2 The objective is for 100 % segregated material to be reached.	Documents and records provided documented evidence that the FFB receipt and processed, and CPO and PK produced are traceable to 100% certified material. The product type and supply chain module indicated as CSPO/IP and CSPK/IP on relevant documents.	Complied
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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, viz; Monorum Mill and Anlong Kropeu Mill** have been able to comply with the requirements of the RSPO SCCS under the 'IP' module and are thus eligible for 'IP' trading for their palm products for year 2019/2020.

3.1.3 Monitoring of CSPO and CSPK Traded in RSPO Palm Trace:

The trading of the certified products via RSPO PalmTrace was monitored by the MRICOP Grouping. The records maintained relied on internal communications of the trading done by the MRT-TCC HQ delivered to the Buyers. The volumes of CSPO and CSPK traded as verified during assessment are as follows:

Table 8-1: Summary of Trading – Monorum POM

Member Name: Mong Reththy Investment Cambodia Oil Palm Co., Ltd. – Monorum Palm Oil Mill

Member ID: RSPO_PO100000223 License ID: CB72455

Details as per RSPO Certification System Document		
	CPO (mt)	PK (mt)
Last year's (Projected): Start date: 15 Aug 2018, Expiry date: 14 Aug 2019. Certified volume (RSPO Certified)	10,488	2,461
a) Last year's Actual sold volume. (RSPO Certified)	0.00	0.00
b) Last year's Actual sold volume * (Other Schemes Certified)	0.00	0.00
c) Last Year's Actual sold volume ** Conventional	10,380.50	2,320.50
d) Last year's Actual sold volume. (RSPO Credits)	0.00	0.00
Total of (a) + (b) + (c) + (d)	10,380.50	2,320.50
New (Projected): Start date: 15 Aug 2019, End date: 14 Aug 2020. Certified Volume (RSPO Certified)	10,385	2,585

Table 8-2: Summary of Trading – Anlong Kropeu POM

Member Name: MRICOP Anlong Kropeu Palm Oil Mill

Member ID: RSPO_PO1000003115 License ID: CB72453

Details as per RSPO Certification System Document		
	CPO (mt)	PK (mt)
Last year's (Projected): Start date: 15 Aug 2018, End date: 14 Aug 2019. Certified volume (RSPO Certified)	42,219	10,113
a) Last year's Actual sold volume. (RSPO Certified)	1,753.54	9,708.65
b) Last year's Actual sold volume. * (Other Schemes Certified)	0.00	0.00
c) Last Year's Actual sold volume. ** Conventional	39,561.73	0.00
d) Last year's Actual sold volume. (RSPO Credits)	0.00	0.00
Total of (a) + (b) + (c) + (d)	41,315.27	9,708.65

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New (Projected): Start date: 15 Aug 2019, End date: 14 Aug 2020. Certified Volume (RSPO Certified)	47,280	11,280
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Notes:

Volumes sold which are not claimed under 'Certified' are sold as 'Conventional' volumes.

There has been no trading/selling done under 'RSPO Credits'.

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

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

Assessment Type	Year	Noncompliance (NC)	Observations (OBS)	Follow up status
Re-certification Assessment	2017	9 (6 Major & 3 Minor)	6	Actions taken on the NCRs verified to be effective during ASA-01.
Annual Surveillance Assessment (ASA-01)	2018	4 (2 Major & 2 Minor)	6	Actions taken on the NCRs verified to be effective during ASA-02.
Annual Surveillance Assessment (ASA-02)	2019	9 (7 Major & 2 Minor)	1	Next Surveillance Assessment

3.2.1 Year 2019: ASA-02: 9 NCs (7 Major & 2 Minor)

NC#	RSPO P&C / CLI Indicator	Details of Non-Conformance (NC)
Major: AL-01	RSPO SCC 5.3.2	Date issued: 10 May 2019
		Requirement:
		5.3.2 The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. ii) effectively implements and maintains the standard requirements within its organization.
		Statement of Nonconformance:
		1. The procedure for addressing Supply chain procedures has not been updated in reference to the latest RSPO Market Communications and Claims document (version 1 Jan 2019). 2. Annual Internal audit did not cover the latest RSPO Market Communications and Claims document.
		Evidence of Nonconformance:
		Location: Palm Oil Mills – Office Documented procedure: SOP used at POMs for IP Module is SC-033 Rev No. 4 (dated 05 Jul 2017). The procedure is for the implementation of all elements of IP Model. However, the SOP has not been updated to address the RSPO SCC standard (version July 2017) and the full implementation needed. The internal audits were conducted on 7-12 May 2018 and 21-27 Dec 2018. However, the audits did not adequately cover all the requirements of the RSPO SCC (version July 2017) such as the RSPO Market Communications and Claims document. Internal auditors were also not aware of the latest version RSPO Market Communications and Claims document revised and effective 1 Jan 2019.

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	Root Cause and Corrective Action(s): by Auditee representative	
	Root cause: In the early year of 2019, the key long year employment service mill personnel who are in charge of the compliances of RSPO SCCS since the company has been RSPO certified had resigned from the company. Consequently, the new management in charge of the mills has inadequate time for understanding fully the requirements of RSPO SCCS due to the mill operations are in the difficult situations; in which need to be given the first priority for attention from all level of personnel.	
	Corrective Action: The Manufacturing Director and his key mill management with getting the collaboration from the Quality Control Manager who is in charge of overall RSPO compliance are taking immediate actions to correct the shortcomings as stated in the statement of nonconformance above as followings: <ol style="list-style-type: none"> 1. Reviewing and updating the standard operating procedure on supply chain for its IP Module by including the latest RSPO Market Communications and Claims document (version 1 Jan 2019). 2. The internal auditors is going to get the refreshing training on the RSPO SCCS with the update of the latest RSPO Market Communications and Claims document. 	
	Verification on Corrective Action(s): by Lead Auditor / Auditor	
	MAJOR NC: Off-site Verification on documentations: 10 Aug – 26 Sept 2019 Corrective actions taken: As stated by Auditee in their RC & CA Supportive evidences: Verified and evaluated for completeness. Revised SOP (version 1 Jan 2019) and revised checklists was submitted. Internal refresher training records submitted were verified found to be adequate for closure. On-site verification is waived and effective closure to be done during next surveillance.	
	Conclusion: Evidences submitted as above for the corrective actions done with attached evidences at the audited site POM RSPO SCC revised SOP and training records were verified. The actions taken and implementation were found to have satisfactorily addressed the issue and acceptable for closure. On-site verification is waived and effective closure to be done during next surveillance.	
	NC status closed by auditor: AL	Date closed: 30 Sept 2019
	Verification of effectiveness: Next surveillance	
NC status verified by auditor:	Date verified:	

NC#	RSPO P&C / CLI Indicator	Details of Non-Conformance (NC)
Major: AL-02	RSPO SCC 5.8.2	Date issued: 10 May 2019
		Requirement: 5.8.2.Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.
		Statement of Nonconformance: 1. The training needed for the new personnel involved in the supply chain certification standard is not adequately implemented.
		Evidence of Nonconformance:

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	<p>Location: Palm Oil Mills – Office There is inadequate knowledge and awareness of the revised RSPO SCC (July 2017) and the latest RSPO Market Communications and Claims document (version 1 Jan 2019) by personnel involved in the implementation of the RSPO SCC.</p> <p>New mill personnel and Internal auditors are not adequately given training and/or refresher training on the identification and monitoring needed on documentations for transactions of RSPO Certified products.</p> <p>Root Cause and Corrective Action(s): by Auditee representative</p> <p>Root cause: The crude palm oil mill Management have accepted that we have less time focusing on the update of the new standard documents for the RSPO SCC due to the huge challenge on maintaining and repairing the mills in order to make sure that they could cope with the high amount of FFB delivery to the mills.</p> <p>Corrective Action: With the immediate actions to the root cause of nonconformance, the Quality Control Manager who is in charge of the RSPO standard compliances is going to collaborate with the crude palm oil mill Management conducting the training on the latest of RSPO SCC and RSPO Communications and Claims for new mill personnel and other relevant personnel from Sales and Marketing, Dispatch and Quality sections to ensure that they are fully aware of all requirements of these RSPO standard documents and put them in the real implementation.</p> <p>Verification on Corrective Action(s): by Lead Auditor / Auditor</p> <p>MAJOR NC: Off-site Verification on documentations: 10 Aug – 26 Sept 2019 Corrective actions taken: As stated by Auditee in their RC & CA Supportive evidences: Verified and evaluated for completeness. Revised SOP (version 1 Jan 2019) and revised checklists was submitted. Internal refresher training records submitted were verified found to be adequate for closure. On-site verification is waived and effective closure to be done during next surveillance.</p> <p>Conclusion: Evidences submitted as above for the corrective actions done with attached evidences at the audited site POM RSPO SCC revised SOP and training records were verified. The actions taken and implementation were found to have satisfactorily addressed the issue and acceptable for closure. On-site verification is waived and effective closure to be done during next surveillance.</p> <table border="1"> <tr> <td>NC status closed by auditor: AL</td> <td>Date closed: 30 Sept 2019</td> </tr> <tr> <td colspan="2">Verification of effectiveness: Next surveillance</td> </tr> <tr> <td>NC status verified by auditor:</td> <td>Date verified:</td> </tr> </table>	NC status closed by auditor: AL	Date closed: 30 Sept 2019	Verification of effectiveness: Next surveillance		NC status verified by auditor:	Date verified:
NC status closed by auditor: AL	Date closed: 30 Sept 2019						
Verification of effectiveness: Next surveillance							
NC status verified by auditor:	Date verified:						

NC#	RSPO P&C / CLI Indicator	Details of Non-Conformance (NC)
Major: CBK-01	4.7.2	Date issued: 10 May 2019
		Requirement: 4.7.2 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.
		Statement of Nonconformance:
		The documented risk assessments had included control measures to prevent accident. However, these control measures were not adequately implemented and risk of accidents that had occurred were not re-assessed.

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	<p>Evidence of Nonconformance:</p> <p>Location: At all the Estates(A-D), harvesting sickles and chisels were not covered when not in use.</p> <p>Old motorcycle tubes noted to be used as cover for sickle by the worker, who was carrying out bagworm census at Estate A.</p> <p>Fertiliser bags were noted used as covers for slashing machetes, which are not suitable for such purpose.</p> <p>Clean water was not made available for emergency eyewash kit at Estates B, C and D for workers who were carrying out the harvesting work.</p> <p>At Estate C, re-assessment of risks conducted on 24 April 2019 had not included the accident that occurred on 23 February 2019 (worker's left foot was cut by machete during slashing work at field).</p> <p>Root Cause and Corrective Action(s): by Auditee representative</p> <p>Root cause: The Estate Management have accepted that there is still a continuous need for taking more efforts on the implementation of the control measures where risks have been assessed on the ground even though the awareness and monitoring on these implementations have been taken place from the beginning up to now.</p> <p>Corrective Action: The Estate Management is taking immediate actions on the implementations of the control measures where risks have been assessed to make sure that all accidents are preventable, as following.</p> <ol style="list-style-type: none"> i. Reviewing the proper and acceptable safety covers for all harvesting sickles and chisels. On the other hand, for the slashing machetes, the Estate Management is working with the Workshop Management to propose and make the proper and acceptable safety covers for them since these local slashing machetes do not have the safety cover from the first purchase. ii. The arrangement and immediate availability of clean water for emergency eyewash kit at all areas of harvesting works shall be responsible by harvesting conductors and Division Heads and shall be in effective for implementation from now onward. iii. Immediate reviewing the risk assessment documents regarding to the accident occurred on 23 February 2019 at the Estate C iv. Once again, conduct the awareness training on the control measures on the risks of harvesting tools and harvesting work. <p>Verification on Corrective Action(s): by Lead Auditor / Auditor</p> <p>MAJOR NC: Off-site Verification on documentations: July - 10 Aug 2019 Corrective actions taken: As stated by Auditee in their RC & CA Supportive evidences: Verified and evaluated for completeness. Revised HIRARC and Risk assessment review documents was submitted. Internal Awareness training records for Field Harvesters and Slashing workers (between 10 and 20 June 2019) submitted were verified found to be adequate for closure. On-site verification is waived and effective closure to be done during next surveillance.</p> <p>Conclusion: Evidences submitted as above for the corrective actions done with attached evidences at the audited site Estates A-D, and training records were verified. The actions taken and implementation were found to have satisfactorily addressed the issue and acceptable for closure. On-site verification is waived and effective closure to be done during next surveillance.</p>
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	Verification of effectiveness: Next surveillance	
	NC status verified by auditor:	Date verified:

NC#	RSPO P&C / CLI Indicator	Details of Non-Conformance (NC)
Major: CBK-02	4.7.4	Date issued: 10 May 2019
		Requirement:
		4.7.4 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.
		Statement of Nonconformance:
		Occupational Safety And Health Plan / Program stated that Occupational Safety & Health subcommittee meetings are to be conducted every 3 months but this was not consistently carried out for year 2018 / 2019. There was no action plan for the matters that were discussed at the meetings when required. Some safety and health concerns were not discussed at these meetings.
		Evidence of Nonconformance:
		Location: At the Anlong Kropeu Mill, it was noted that the OSH/ESG meetings were not held consistently since July 2018 and todate. At the estates, the minutes of the OSH/ESG meetings recorded general statements on matters such as work safely, use PPE, drive carefully etc. However, the action plan on what will be done, who will be responsible and how these concerns can be improved is not adequately documented for follow up. There was also inadequate evidence on matters related to prevention of accidents, risk re-assessments, new risk assessment, adequacy of procedures, medical check-up results and other health issues were discussed.
		Root Cause and Corrective Action(s): by Auditee representative
		Root cause: The Management Team involved with these activities have not adequately considered the importance of the OSH/ESG meetings and therefore did not pay much attention to the monitoring and action plans needed on the key specific issues raised in the above statement of nonconformance. Corrective Action: The below is the key activities that shall be done immediately to correct the above nonconformance: i. The Management Team which consists of the authorized representatives from the Head of Departments shall hold a meeting in order to review the effectiveness of organizing the meeting and its expected results so that each management unit could follow as the guideline principles. ii. The concerned sub-committees on OSH/ESG from Anlong Kropeu Mill and Estates shall conduct their meeting with regarding to the new guideline principles resulted in the Management Team meeting.

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		<p>MAJOR NC: Off-site Verification on documentations: 5 Sept 2019 Corrective actions taken: As stated by Auditee in their RC & CA Supportive evidences: Verified and evaluated for completeness. OSH / ESG meeting documents held on July 2019, included with appropriate action plans submitted for the Mill & Estates. Evidences submitted on actions taken in Aug 2019, were verified.</p>		
		<p>Conclusion: Evidences submitted as above for the corrective actions done with attached evidences at the audited sites i.e. at Mills and Estates A-D were verified. The actions taken and implementation were found to have satisfactorily addressed the issue and acceptable for closure. On-site verification is waived and effective closure to be done during next surveillance.</p>		
		<table border="1"> <tr> <td>NC status closed by auditor: CBK & AL</td> <td>Date closed: 5 Sept 2019</td> </tr> </table>	NC status closed by auditor: CBK & AL	Date closed: 5 Sept 2019
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NC status verified by auditor:	Date verified:			

NC#	RSPO P&C / CLI Indicator	Details of Non-Conformance (NC)
Minor OCL-01	5.4.1	Date issued: 10/05/2019
		Requirement: A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored.
		Statement of Nonconformance: The diesel consumption of contractors was not included in the data compiled for monitoring and analyzing the use of fossil fuel (diesel).
		Evidence of Nonconformance: Location: Estate A The estate maintained monthly diesel consumption records but only for their own vehicles and activities. There were no records available or maintained for the diesel consumption by contractors.
		Root Cause and Corrective Action(s): by Auditee representative Root cause: The Estate A Management has only focussed on maintaining the diesel consumption data for its own vehicles and activities. The diesel consumption by the contractors was not monitored by the Estate as the diesel was under the contractors' own cost.
		Corrective Action: The Estate A Management shall take immediate actions for the above nonconformance as following. i. Reviewing again with all contractors and collecting data of using diesel for servicing the Estate A's activities since January 2019 up to May 2019 within June; and ii. Started working with any concerned contractors on diesel consumption from June 2019 onwards.
		Verification on Corrective Action(s): by Lead Auditor / Auditor

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		Minor NC: Off-site Verification on documentations: 30 June 2019 Corrective actions taken: As stated by Auditee in their RC & CA Plan Supportive evidences: Verified and evaluated for completeness. Review meeting records at Estate A were submitted for Jan - May 2019 with CA plan for June 2019 onward were reviewed and verified.	
		Conclusion: Evidences submitted as above for the corrective actions at the audited site - Estate A, was verified. The actions plan for continued implementation were found to have satisfactorily addressed the issue.	
		NC status closed by auditor: CAP verified by OCL	Date closed: Next assessment
		Verification of effectiveness: Next surveillance	
		NC status verified by auditor:	Date verified:

NC#	RSPO P&C / CLI Indicator	Details of Non-Conformance (NC)
Major OCL-01	5.6.2	Date issued: 10/05/2019
		Requirement: Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented.
		Statement of Nonconformance: The test and analysis for the following significant pollutants were not carried out for year 2019 as to date: (1) POME (2) Stack air emission
		Evidence of Nonconformance: Location: Monorum POM (3) The test and analysis results for POME (which the PMU does not discharge into waterways/streams but use for field application) was not available for year 2019 for verification. (4) The latest report on air emission quality test and analysis was on 31 May 2018. There was no test and analysis results on air emission quality available for year 2019 for verification.
		Root Cause and Corrective Action(s): by Auditee representative Root cause: (1) The crude palm mill Management has got misunderstanding on the purpose of the result analysis of the POME sample, which focusing on the discharge to the waterways/streams, but not being aware of using for field application. (2) The crude palm oil mill Management has agreed with the creditable outsource contractor to take air emission sample for testing and analysis in June 2019. Corrective Action: The crude palm oil mill Management will take immediate actions to correct the above nonconformance as following. i. Take a sample of POME from Monorum POM and send it to the laboratory for the analysis ii. Follow up and make sure that taking air emission sample will be done as per schedule and analysis result report will be available for review.
		Verification on Corrective Action(s): by Lead Auditor / Auditor

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	<p>MAJOR NC: Off-site Verification on documentations: 15 July 2019 Corrective actions taken: As stated by Auditee in their RC & CA Supportive evidences: Verified and evaluated for completeness. Final discharge water analysis report (dated 30 June 2019), Air emissions quality reports (dated 10 June 2019) done for Monorum POM, were submitted on 10 July 2019 and reviewed. Evidences submitted were verified found to be adequate for closure. On-site verification is waived and effective closure to be done during next surveillance.</p>		
	<p>Conclusion: Evidences submitted as above for the corrective actions done with attached evidences at the audited sites i.e. at Monorum Mill were verified. The actions taken and implementation were found to have satisfactorily addressed the issue and acceptable for closure. On-site verification is waived and effective closure to be done during next surveillance.</p>		
	<table border="1"> <tr> <td>NC status closed by auditor: OCL</td> <td>Date closed: 15 July 2019</td> </tr> </table>	NC status closed by auditor: OCL	Date closed: 15 July 2019
NC status closed by auditor: OCL	Date closed: 15 July 2019		
	<p>Verification of effectiveness: Next surveillance</p>		
	<table border="1"> <tr> <td>NC status verified by auditor:</td> <td>Date verified:</td> </tr> </table>	NC status verified by auditor:	Date verified:
NC status verified by auditor:	Date verified:		

NC#	RSPO P&C / CLI Indicator	Details of Non-Conformance (NC)
Major: EC-01	6.1.3	Date issued: 10 May 2019
		Requirement: 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.
		Statement of Nonconformance: There was no timetable included in the plans to ensure the implementation is monitored by the PMU or respective persons responsible.
		Evidence of Nonconformance:
		Location: Estates A - D There is no documented evidence on the timetable available for review on the mitigation of negative impacts and promotion of the positives for all the affected parties. On-site Management interviews further confirmed that such timetable is not available and monitoring was done on a basis of upon request only, which was not adequately documented.
		Root Cause and Corrective Action(s): by Auditee representative
		Root cause: The Management have understood that each item of mitigation of negative impacts and promotion of the positive ones identified in the summary of the social impact assessment has been put into the actual implementation with the responsible dedicated management units; for instance, keeping informing the local stakeholder about the company's sustainable development for oil palm plantation is communicated through the annual stakeholder consultancy meeting conducting in March every year. However, the Management accepted that the actual timetable has been missed for this matter.
		Corrective Action: The immediate action is taken to correct the above nonconformance through conducting a Management meeting in order to review the Social Impact Assessment; and based on that the comprehensive timetable will be established for the mitigation of negative impacts and promotion of positive ones in pursuance to the current social context at the ground that can be practical.
		Verification on Corrective Action(s): by Lead Auditor / Auditor

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		<p>MAJOR NC: Off-site Verification on documentations: July – Sept 2019 Corrective actions taken: As stated by Auditee in their RC & CA Supportive evidences: Verified and evaluated for completeness. Revised SIA and related Management Plans with Implementation timelines (dated 24 June 2019) to be further implemented for Estates A-D, submitted on 10 July 2019, were reviewed. The evidences submitted were verified found to be adequate for a conditional closure.</p>		
		<p>Conclusion: Evidences submitted as above for the corrective actions done with attached evidences at the audited sites i.e. at Estates A-D were verified. The actions taken and implementation were found to have satisfactorily addressed the issue and acceptable for closure. On-site verification is waived and effective closure to be done during next surveillance.</p>		
		<table border="1"> <tr> <td>NC status closed by auditor: EC & AL</td> <td>Date closed: 30 Sept 2019</td> </tr> </table>	NC status closed by auditor: EC & AL	Date closed: 30 Sept 2019
NC status closed by auditor: EC & AL	Date closed: 30 Sept 2019			
		Verification of effectiveness: Next surveillance		
		<table border="1"> <tr> <td>NC status verified by auditor:</td> <td>Date verified:</td> </tr> </table>	NC status verified by auditor:	Date verified:
NC status verified by auditor:	Date verified:			

NC#	RSPO P&C / CLI Indicator	Details of Non-Conformance (NC)
Major: EC-02	6.3.2	Date issued: 10 May 2019
		Requirement: Documentation of both the process by which a dispute was resolved and the outcome shall be available.
		Statement of Nonconformance: Both the process by which a complaint and grievance was resolved, and the outcome was not documented.
		Evidence of Nonconformance: Location: Estates A, B, C & D Based on management interview, it was noted that the respective estates do receive verbal complaints and grievances from various stakeholders. However, the process of maintaining the records of complaints and grievance was not adequate although the issues were noted to be progressively resolved.
		Root Cause and Corrective Action(s): by Auditee representative Root cause: The Estate Management have acknowledged that the field supervision frontline staff like field conductors and Division Head have treated the minor complaints and grievances as a normal practice of mutual communication at the workplace, while documenting all these complaints and grievances are rarely put into practice.
		Corrective Action: The Estate Management is going to collaborate with the Admin/HR department and Quality Control to <ul style="list-style-type: none"> i. Conduct a refresh training on the standard operating procedure (SOP) on Complaints and Grievances to all concerned field supervision frontline staff to re-make sure again that they are able to know what should be done on the complaints and grievance issues; ii. Review the standard recording form for starting using from now onward.
		Verification on Corrective Action(s): by Lead Auditor / Auditor

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		<p>MAJOR NC: Off-site Verification on documentations: July – Sept 2019 Corrective actions taken: As stated by Auditee in their RC & CA Supportive evidences: Verified and evaluated for completeness. Refresher training records for related personnel on the SOP for Complaints and Grievance handling and implementation at Estates A-D, submitted on 10 July 2019, were reviewed. The evidences submitted were verified found to be adequate for a conditional closure.</p>						
		<p>Conclusion: Evidences submitted as above for the corrective actions done with attached evidences at the audited sites i.e. at Estates A-D were verified. The actions taken and ongoing implementation were considered as adequate for addressing the issue and acceptable for the conditional closure. On-site verification is waived, and effective closure will be done during next surveillance.</p>						
		<table border="1"> <tr> <td>NC status closed by auditor: EC & AL</td> <td>Date closed: 30 Sept 2019</td> </tr> <tr> <td colspan="2">Verification of effectiveness: Next surveillance</td> </tr> <tr> <td>NC status verified by auditor:</td> <td>Date verified:</td> </tr> </table>	NC status closed by auditor: EC & AL	Date closed: 30 Sept 2019	Verification of effectiveness: Next surveillance		NC status verified by auditor:	Date verified:
NC status closed by auditor: EC & AL	Date closed: 30 Sept 2019							
Verification of effectiveness: Next surveillance								
NC status verified by auditor:	Date verified:							

NC#	RSPO P&C / CLI Indicator	Details of Non-Conformance (NC)
Minor: EC-05	6.6.2	Date issued: 10 May 2019
		Requirement: Minutes of meetings with main trade unions or workers representatives shall be documented.
		Statement of Nonconformance: The minutes of the meeting discussion at sub-committee level on Social & Gender is limited to definition and policies of the PMU.
		Evidence of Nonconformance: Location: Estate C & D Based on document review, it was noted the meeting on Social & Gender conducted on 20 March 2019 for Estate C and 29 April 2019 for Estate D is limited to definition and policies of the PMU. The relevant objectives required for the meeting review was not discuss which includes issues of concern raised, actions and implementation of the outcome needed for follow up after the meeting.
		Root Cause and Corrective Action(s): by Auditee representative Root cause: The Administration and Human Resource Management who is in charge of the social and gender issues has acknowledge that the monitoring processes on the implementation of social and gender best practice are still needed to be improved to the key members of the sub-committee level to do their job properly and correctly.
		Corrective Action: The Administration and Human Resource Management is going to do as following i. Conducting a refresh awareness training on dealing with organizing the effective meeting and making action plan for the social and gender issues ii. Monitoring and following up the regular sub-committee meeting which scheduled every three-month whether the relevant issues raising in the meeting have been put into the action plan and following-process of the work done for review and verification.
		Verification on Corrective Action(s): by Lead Auditor / Auditor

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	Minor NC: Off-site Verification on documentations: 30 June 2019 Corrective actions taken: As stated by Auditee in their RC & CA Plan Supportive evidences: Verified and evaluated for completeness. Corrective action plan for refresher training and further monitoring actions for implementation at Estates A-D, as submitted for June 2019 onward is verified and found to be adequate for closure.	
	Conclusion: The actions planned for implementation at Estates A-D, were considered adequate for addressing the issue and to be closed in the next assessment.	
	NC status closed by auditor: CAP verified by EC	Date closed: Next assessment
	Verification of effectiveness: Next surveillance	
	NC status verified by auditor:	Date verified:

3.2.2 Year 2019: ASA-02: 2 Observations

Ref No:	RSPO P&C / CLI Indicator	Details of Observation	Status		
			Opened date	Closed date	Remark, if any
OBS# OCL-01	5.3.3	Location: Estate B, C & D Signboards were available at the landfills but the date of opening and date of closing of the pits were not indicated, where applicable.	10 May 2019	-	Next assessment
OBS# OCL-02	5.6.3	Location: Estate A, B & C Water samples at the inlet and outlet of various streams in these estates were not yet carried out (Noted that the previous sampling and testing were done in May 2018).	10 May 2019	-	Next assessment

3.2.3 Year 2018: ASA-01: 4 NCs (2 Major & 2 Minor)

NC#	RSPO P&C / CLI Indicator	Details of NC
Major AL-01 (upgraded)	6.5.3	Date issued: 22/06/2018
		Indicator requirement: 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.
		Nonconformance: Location: Estate B, Estate C & Monorum Mill At the housing blocks for workers there were still domestic rubbish such as empty plastic containers (for lubricants) found thrown around. Large Waste bins which were provided but not properly used. Estate B: Several vacant units of housing blocks were not adequately maintained as old furniture and miscellaneous items were still lying around. Estate B & C: The contractor workers makeshift housing were not adequate and

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		<p>also rubbish were scattered all over including at the drains.</p> <p>At primary school (Anlong Krapeu), the temporary housing for the teacher was noted to be in a classroom which should not be permitted. Broken glass was on doors are noted to be potential safety hazards to the school children. Broken toilet doors were not repaired. Overall maintenance is not satisfactory.</p> <p>This NC is now upgraded to Major status as previous year NC (2017) was issued and action taken to date is considered to be not effective.</p> <p>Root Cause and Corrective Action:</p> <p>Root Cause</p> <p>1. Domestic Rubbish at Estate B, C and Monorum Mill: There may be two combination factors that causing the messy domestic rubbish at the housing blocks for workers at the Estate B, C and Monorum Mill:</p> <ul style="list-style-type: none"> (a) Conducting awareness of living hygiene for the workers who are coming from the different background is not enough to make them adopting the paradigm shift of good and proper domestic rubbish. There are some evidences of awareness session conducted by the concerned departments regarding to the living hygiene. (b) The limitation of the monitoring process of implementing the applicable internal rules and regulations of the company accommodation. <p>2. Inadequate maintenance of vacant units of the housing blocks at Estate B: We accept that there is less attention on monitoring and properly maintaining those several vacant units of housing blocks at Estate B due to the number of workers are less occupying them.</p> <p>3. Inadequate makeshift housing for contracting workers at Estate B & C: There may be under estimated the number of contracting workers who are always fluctuated at the position of staying at the company's worker quarter.</p> <p>4. The temporary housing for the teacher in the classroom and the broken glass on the doors at Anlong Krapeu primary school: The company does not have directly authority to supervise the school.</p> <p>Corrective Action:</p> <p>1. Domestic Rubbish at Estate B, C and Monorum Mill The Management shall do immediate actions as following:</p> <ul style="list-style-type: none"> (a) Reviewing the master action plan on the sanitation and hygiene at all company's accommodation once again in order to make sure that the activities of awareness/campaign concerned are sufficient (b) The applicable rules and regulations of the company accommodation regarding to the sanitation and hygiene shall be reinforced; and the regular scheduled actions shall be taken place with the progress of report after monitoring. <p>2. Inadequate maintenance of vacant units of the housing blocks at Estate B The Admin Manager who is in charge of this issues, by getting support from the relevant department (if need), is taking immediate action to clean up and rearrange everything in the vacant units of house blocks at Estate B in a proper and good condition. The report on taking actions on this enclosed for the proof evidence.</p> <p>3. Inadequate makeshift housing for contracting workers at Estate B & C The immediate action is that the Admin department is working with the concerned estates rechecking and confirming the actual number of the contracting workers who are staying at the makeshift housing at the company accommodation. After that we are going to analyse the quantity of the makeshift housing needs and look for the vacant units of housing blocks to be arrange for them accordingly.</p>
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		<p>4. The temporary housing for the teacher in the classroom and the broken glass on the doors at Anlong Kropeu primary school The company management is going</p> <ul style="list-style-type: none"> • to work and collaborate with the concerned teacher to find out the possible and proper solutions to the problem of taking classroom for the temporary housing and • to fix the broken glass on the doors at the Anlong Kropeu primary school. The enclosed is the evidence for the company management's action taken. 		
		<p>Verification (Corrective Action): Off-site verification carried out. The following evidences submitted were verified and found to be acceptable for closing the non-conformance:</p> <ol style="list-style-type: none"> (1) Master action plan on the sanitation and hygiene at all company's accommodation, Rules & Regulations on accommodation, Hygiene awareness training on 30/06/2018, report, attendance list and photo. (2) Clean-up done on 20&21/07/2018 supported by report, attendance list and photo. (3) Survey report on the housing needs, building plan and photos of commencement of building works of 10 units of housing. (4) Report of meetings with the School Director and five teachers on 04/07/2018 and 13/07/2018 respectively and agreed actions on temporary accommodation elsewhere and building of new permanent accommodation. Photos of the repair and replacement of broken doors and glass windows. <p>The corrective actions satisfactorily addressed the non-conformance.</p>		
		<table border="1" style="width: 100%;"> <tr> <td style="width: 60%;">Verified by auditor: Closed by OCL</td> <td style="width: 40%;">Date closed: 02/08/2018</td> </tr> </table>	Verified by auditor: Closed by OCL	Date closed: 02/08/2018
Verified by auditor: Closed by OCL	Date closed: 02/08/2018			
		<p>Verification (for effectiveness): Implementation of CA found to be effective and accepted for closure in ASA-02. Verified by auditor: AL on 10 May 2019</p>		

NC#	RSPO P&C / CLI Indicator	Details of NC
Major CBK-01 (upgraded)	4.7.5	Date issued: 22/06/2018
		<p>Indicator requirement: 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>Nonconformance: (1) At Anlong Kropeu Palm Oil Mill (l) There was accident that had occurred during repair and maintenance of the sterilizer in the Anlong Kropeu Mill on 5 May 2018 when the hand of a cleaner got caught in the machine. This accident was reported, investigated and follow up actions were proposed and time frame for implementation was recommended. The lost time due to this accident was reported to be 50 hours.</p> <ol style="list-style-type: none"> a) There was no evidence that reassessment of the risk for the Sterilizer operation was conducted. b) There was no evidence of follow up training session provided to the workers on new control measure to prevent recurrence of the accident. c) The cleaner who was involved in the accident was not trained or authorised to

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		<p>perform repair and maintenance work on the steriliser.</p> <p>(II) The fire extinguisher near the water treatment plant showed that it required recharge. There was no evidence that the readiness of the fire extinguishers was monitored</p> <p>The fire hose located near the water treatment plant was leaking and without a nozzle.</p> <p>At Estate B</p> <p>The lost time due the accident involving worker (Hoy Rathana) on 7 March 2018 was reported to be 72 hours. However, there was no evidence that a risk re-assessment was conducted.</p> <p>(2) At Monorum Palm Oil Mill,</p> <p>Risk Assessment reviewed on 26/4/2018 had included reassessment of previous accident when the rope for pulling the cage came loose and hit the worker. It was recorded in the risk re-assessment that additional control measure included was to always stand away from path of rope while pulling cage.</p> <p>However, SOP-CM-022 Machinery Safety had not included this additional control measure.</p> <p>[Since at the previous assessment (Re-cert 2017), a Minor NC# CBK-01 and an Observation OBS# CBK-02) have been raised against this same indicator, the NC is now upgraded to Major NC as the corrective action taken is considered to be not effectively implemented.]</p> <hr/> <p>Root Cause and Corrective Action:</p> <p>Root Cause:</p> <p>(1) Anlong Kropeu Palm Oil Mill</p> <p>(I) There is misunderstanding of the context of risk assessment on the Kernel Recovery station, which is not stated about other person, could be harmed except the operators and maintenance staff.</p> <p>(II) Insufficient training on how to check the usage condition of the fire extinguisher to the staff who was assigned to collect and replace The monitoring of the fire hose is not put into the Preventive Maintenance plan. Thus, the attention is less focused</p> <p>The Accident at Estate B : The Risk not re-assessed</p> <p>There was misunderstanding between accident related to the work operations and the personal accident.</p> <p>(2) Monorum Palm Oil Mill: The additional control measure from re-assessment resulted from the accident not included into the SOP-CM-022 Machinery Safety</p> <p>The unexpected thinking was mistaken that incorporating the reassessment of the accident happened into the Risk Assessment reviewed on 26th April 2018 was fulfill to all concerns.</p> <p>Corrective Action:</p> <p>(1) Anlong Kropeu Palm Oil Mill</p> <p>The immediate action as following</p> <p>(I) The Management of Anlong Kropeu Palm immediately re-assesses the risk for the Kernel Recovery station; and then the training session for all concerned staff and workers is conducted. The evidence is enclosed</p> <p>(II) The OSH-ESG (Occupational safety, health, environment, social & gender) sub-committee held a meeting in order to select the responsible staff for taking care on monitoring the fire extinguisher. The training session for the assigned staff is conducted. Evidence enclosed.</p> <p>For the fire hose, the purchasing requisition for the total amount of 12 sets was issued and approved 28th May 2018 for replacing the old ones. The replace work is expected to be done within next month.</p>
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		<p>The Accident at Estate B : The Risk not re-assessed The detailed procedures on the accident relevant to the driving, which is separated from the field working procedures for the Plantation, is fully covered by the Road Safety Policy endorsed on 27th May 2013. Therefore, once again, the Admin/HR department is going to conducting a refresh session on the Road Safety Policy to all concerned staff.</p> <p>(2) Monorum Palm Oil Mill : The additional control measure from re-assessment resulted from the accident not included into the SOP-CM-022 Machinery Safety The immediate review and incorporating the additional control measure after the accident is included into the SOP-CM-022 Machinery Safety. The enclosed is the review of SOP-CM-022 on Machinery Safety for the evidence.</p> <p>Verification (Corrective Action): Off-site verification carried out. The following evidences submitted were verified and found to be acceptable for closing the non-conformance: (1) Re-assessment of the risk for the Kernel Recovery station; and training session on 11/07/2018 with attendance list and photo. Meeting conducted on 12/07/2018 with attendance list and photo. Mr. Ngov Phearum (Supervisor) appointed as the Fire Extinguisher Controller. The training session on inspection of fire extinguisher was conducted on 12/07/2018 with attendance list and photo. Purchasing requisition for 12 sets of fire hose to replace all the old fire hose. Refresher training on driving safety conducted for all relevant staff on 10-12/07/2018 with attendance list and photos. (2) The control measure had been included in the SOP-CM-022 Machinery Safety. The corrective action satisfactorily addressed the non-conformance.</p> <p>Verified by auditor: Closed by OCL</p> <p align="right">Date closed: 02/08/2018</p> <p>Verification (for effectiveness): Implementation of CA found to be effective and accepted for closure in ASA-02. Verified by auditor: CBK on 10 May 2019</p>
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NC	RSPO P&C / CLI Indicator	Details of NC
Minor OCL-01	5.1.3	Date issued: 22/06/2018
		<p>Indicator requirement: 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>

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		<p>Nonconformance:</p> <p>Location: Monorum POM</p> <p>According to the Environmental Action Plan (p13) for Monorum POM, the discharge of POME into the stream only when sample taken and analyzed found to meet the standard requirements for various parameters. Noted that for the sample dated 18 May 2018, the analysis results dated 24 May 2018 from Food and Chemical Services stated the following parameters as not complying with the standard requirements:</p> <table border="1"> <thead> <tr> <th><u>Parameter:</u></th> <th><u>Result</u></th> <th><u>Requirement</u></th> </tr> </thead> <tbody> <tr> <td>Ammoniacal Nitrogen (mg/L)</td> <td>28</td> <td>< 7 mg/L</td> </tr> <tr> <td>Total Dissolved Solid (mg/L)</td> <td>3200</td> <td>< 2000 mg/L</td> </tr> <tr> <td>Chemical Oxygen Demand (mg/L)</td> <td>155</td> <td>< 100 mg/L</td> </tr> </tbody> </table> <p>Location: Anlong Kropeu POM</p> <p>According to the Environmental Action Plan (p14) for Anlong Kropeu POM, the discharge of POME into the stream only when sample taken and analyzed found to meet the standard requirements for various parameters. Noted that for the sample dated 18 May 2018, the analysis results dated 24 May 2018 from Food and Chemical Services stated the following parameters as not complying with the standard requirements:</p> <table border="1"> <thead> <tr> <th><u>Parameter:</u></th> <th><u>Result</u></th> <th><u>Requirement</u></th> </tr> </thead> <tbody> <tr> <td>Ammoniacal Nitrogen (mg/L)</td> <td>59</td> <td>< 7 mg/L</td> </tr> <tr> <td>Total Dissolved Solid (mg/L)</td> <td>3600</td> <td>< 2000 mg/L</td> </tr> <tr> <td>Chemical Oxygen Demand (mg/L)</td> <td>270</td> <td>< 100 mg/L</td> </tr> </tbody> </table> <p>There was no evidence of a review of the analysis results by a responsible person to detect non-compliance results and identification of further action.</p>	<u>Parameter:</u>	<u>Result</u>	<u>Requirement</u>	Ammoniacal Nitrogen (mg/L)	28	< 7 mg/L	Total Dissolved Solid (mg/L)	3200	< 2000 mg/L	Chemical Oxygen Demand (mg/L)	155	< 100 mg/L	<u>Parameter:</u>	<u>Result</u>	<u>Requirement</u>	Ammoniacal Nitrogen (mg/L)	59	< 7 mg/L	Total Dissolved Solid (mg/L)	3600	< 2000 mg/L	Chemical Oxygen Demand (mg/L)	270	< 100 mg/L
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Total Dissolved Solid (mg/L)	3600	< 2000 mg/L																								
Chemical Oxygen Demand (mg/L)	270	< 100 mg/L																								
		<p>Root Cause and Corrective Action:</p> <p>Root Cause:</p> <p>There was less focus on the result of POME due to at the Monorum POM this year is not many processing and rarely discharging into the stream, while for the Anlong Kropue POM is not directly discharged to the stream.</p> <p>Corrective Action:</p> <p>The immediate action is as following:</p> <ul style="list-style-type: none"> - Retaking one sample of POME at final discharge point for both POMs for the lab analysis once again - If the results are still not fulfilled the requirement, the Mill Management shall seek for the specialist for consultancy to correct it. 																								
		<p>Verification (Corrective Action Plan):</p> <p>Off-site verification carried out. The Corrective Action Plan (CAP) for re-sampling and analysis to determine compliance with requirements and further necessary action is acceptable. The implementation of the CAP shall be verified at the next surveillance assessment.</p>																								
		<table border="1"> <tr> <td>Verified by auditor: CAP accepted by OCL</td> <td>Date closed: Next assessment.</td> </tr> </table>	Verified by auditor: CAP accepted by OCL	Date closed: Next assessment.																						
Verified by auditor: CAP accepted by OCL	Date closed: Next assessment.																									
		<p>Verification (for effectiveness):</p> <p>Implementation of CAP found to be effective and accepted for closure in ASA-02.</p> <p>Verified by auditor: OCL on 10 May 2019</p>																								

NC#	RSPO P&C / CLI Indicator	Details of NC
Minor	5.6.3	Date issued: 22/06/2018

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OCL-02	Indicator requirement: 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.	
	Nonconformance: Location: Estate B and Estate C It was found that the standard BOD limit of < 30 mg/L was exceeded in the following water sampling and analysis for May 2018: (1) Estate B: BOD results for streams at Div B1, Div B3 and Div. B4 ranged from 40 to 59 mg/L. (2) Estate C: BOD results for streams at Div C1 and Div. C3 were 60 and 71 mg/L respectively. There was no evidence of a review of the analysis results by a responsible person to detect non-compliance results and identification of further action.	
	Root Cause and Corrective Action: Root Cause: There was less focus on the interpretation for the results of BOD value for stream water samples. Corrective Action: The immediate action is as following: - Retaking one sample of each sampling point concerned for lab analysis for verification - If the results are still not fulfilled the requirement, the Quality Assurance section shall seek for the specialist for consultancy to correct it.	
	Verification (Corrective Action): Off-site verification carried out. The Corrective Action Plan (CAP) for re-sampling and analysis to determine compliance with requirements and further necessary action is acceptable. The implementation of the CAP shall be verified at the next surveillance assessment.	
	Verified by auditor: CAP accepted by OCL	Date closed: Next assessment.
	Verification (for effectiveness): Implementation of CAP found to be effective and accepted for closure in ASA-02. Verified by auditor: OCL on 10 May 2019	

3.2.4 Year 2018: ASA-01: 6 Observations

Ref No:	RSPO P&C / CLI Indicator	Details of Observation	Status		
			Opened date	Closed date	Remark, if any
OBS# OCL-01	4.1.1	Estates A, B, C and D The SOP "Leaf & Soil Sampling Analysis" did not have any SOP no. and revision no. for control status to ensure that the latest version of this procedure is being used.	22 Jun 2018	10 May 2019	Addressed and closed
OBS# OCL-02	5.6.2	Monorum POM It was noted that the emission air quality report for sample dated 31 May 2018 at Monorum POM did not include a test for dust particle emission.	22 Jun 2018	10 May 2019	Addressed and closed

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OBS# CBK-01	4.2.2	Estate A and Estate B Adequate wooden planks should be provided to ensure that the fertiliser bags are not directly in contact with the cement floor of the fertiliser stores in both estates.	22 Jun 2018	10 May 2019	Addressed and closed
OBS# CBK-02	4.7.2	Monorum POM and Anlong Kropeu POM The risk assessment relating to working at heights, flocculation tanks at water treatment plant, noise mapping results should be updated.	22 Jun 2018	10 May 2019	Addressed and closed
OBS# AL-01	6.5.4	Health Dispensary It is noted that records and data are compiled by the Nursing Assistants and submitted to Admin / HR for review. However the analysis of data can be improved for more proactive / preventive action such as on the cases of 'abdominal pains'.	22 Jun 2018	10 May 2019	Addressed and closed
OBS# AL-02	6.9.3	Estates A, B, C & D The mechanism for obtaining feedback (including any grievance) can be improved to include smaller group sessions with simplified question and answer requests as briefing presently done were noted to be in big groups which does not allow for any anonymity for feedback or complaints.	22 Jun 2018	10 May 2019	Addressed and closed

3.2.7 Identified Positive Elements

1. Strong commitment by the management and staff in sustainability improvements.
2. Provided infrastructure (roads, bridges, schools and worship temples), free transport, fire-fighting service and contributions for social and community support.
3. Provided employment opportunities for the local community and nearby villagers.

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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:

3.3.1 Feedback Raised by Stakeholders (Annual Surveillance Assessment ASA-01 – Year 2018)

Communication done via email on 10 May 2018 to various categories of stakeholders (see list under **para 2.5**):

Stakeholders' Feedback	PMU Response	CB verification / comments	Follow up comments (if any)
Government Agencies: No feedback received.	Ongoing consultations will be maintained. No response needed.	Verified during on-site assessment that no response needed.	Nil
Non-Governmental Organizations: No feedback received.	Ongoing consultations will be maintained. No response needed.	Verified during on-site assessment that no response needed.	Nil
Local Communities - Stakeholders' Consultation: Selected stakeholders representing the complete range of various stakeholder categories were invited for the Stakeholders' Consultation on 21 Jun 2018. A total of 14 stakeholders, 2 government officers, 2 contractors, 7 villager leaders and 3 school teachers, were present at the consultation. They were interviewed by the auditors without the presence of any of the PMU staff. Concerns and suggestions received during interviews and stakeholder consultations: 1. Snake bites experienced by villagers when passing near oil palm fronds at night. 1. Female worker who was bitten and still receiving treatment need financial assistance. Her husband is working at MRICOP. 2. Permission to collect loose fruits by elder / retired 'old' villagers.	The PMU will consider the concerns and suggestions from the stakeholders as briefed by the auditors during the closing meeting.	To be followed up during the next Assessment.	Improvement actions noted to have been done during ASA-02 (2019)
Local Communities - Interviews: Interviews of sampled staff and workers were also conducted by the auditors during field visits from 18-22 Jun 2018 at the PMU:			

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<p>Staff/Workers sampling: POM = 32 males, 6 females Estate Offices = 35 males, 12 females Field/sites visit = 25 males, 13 females</p> <p>No issues raised by the sampled staff and workers.</p>	No response needed.	No response needed.	Nil
<p>Other Interested parties: No feedback received.</p>	No response needed.	No response needed.	Nil

3.3.2 Feedback Raised by Stakeholders (Annual Surveillance Assessment ASA-02 – Year 2019)

Communication done via email on 2 Apr 2019 to various categories of stakeholders (see list under **para 2.5**):

Stakeholders' Feedback	PMU Response	CB verification / comments	Follow up comments (if any)
<p>Government Agencies: No feedback received.</p>	Ongoing consultations will be maintained. No response needed.	Verified during on-site assessment that no response needed.	Nil
<p>Non-Governmental Organizations: No feedback received.</p>	Ongoing consultations will be maintained. No response needed.	Verified during on-site assessment that no response needed.	Nil
<p>Local Communities - Stakeholders' Consultation: Selected stakeholders representing the complete range of various stakeholder categories were invited for CB independent Stakeholders' Consultation on 9 May 2019. A total of 9 stakeholders (2 government agencies, 1 contractor, 5 village leaders and 1 school teacher) were present at the consultation. They were interviewed by the auditors without the presence of any of the PMU staff. Concerns and suggestions received during interviews and stakeholder consultations:</p> <p>Awareness of safety issues including snake bites issues were provided to villagers. Medical assistance and treatment provided by Dispensaries for incidences were satisfactory.</p> <p>Employment provided for local people was adequate. No complaints.</p>	The PMU will continue improvements needed for stakeholders as briefed by the auditors during the closing meeting.	Confirmed that feedbacks were generally positive and no significant issues of negative impact. No further response needed in current assessment. Continued follow up in next assessment.	

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<p>Interviews during field visits from 6-10 May 2019.</p> <p>Local Communities: Village heads, Villagers, School teachers etc: Total: 18 persons</p> <p>Feedbacks were generally positive and no significant issues of negative impact.</p> <p>Staff & Field workers: Interviews of sampled staff and workers conducted by the respective auditors: Monorum POM: 6 male, 3 female Anlong Kropeu POM: 8 males, 5 female Estate A, B, C & D Offices: 14 male, 8 female Field worker interviews: 18 males, 16 female</p> <p>No issues raised by the sampled staff and workers.</p>	<p>MRICOP Management to maintain stakeholder consultations with affected parties.</p> <p>No further response needed.</p>	<p>Confirmed that feedbacks were generally positive and no significant issues of negative impact.</p> <p>No further response needed in current assessment.</p> <p>Continued follow up in next assessment.</p>	<p align="center">-</p>
<p>Other Interested parties: No feedback received.</p>	<p>No response needed.</p>	<p>No response needed.</p>	<p>Nil</p>

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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 (Jun 2017) 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



Augustine Loh
Lead Assessor

Date: 4 Oct 2019

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. Sunchai Choongan
Deputy Managing Director – MRICOP / MTSI

Date: 7 Oct 2019

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4.2 Intertek RSPO Certificate Details for the PMU

Certificate No:	RSPO 928088
Initial Issue / date:	15 Aug 2012
Re-Certification Start date:	15 Aug 2017
Certificate Expiry date (new):	14 Aug 2022
New PalmTrace License Start date:	15 Aug 2019
Palm trace expiry date:	14 Aug 2020
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 (Jun 2017) for the Palm Oil Mill.
Certification scope:	Production of Crude Palm Oil and Palm Kernel
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 (Titled) Area (ha)	Mature Planted 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° 54' 33.7" N	103° 50' 04.2" 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° 57' 52.1" N	103° 54' 26.2" E	-	-
Estate A (Tapoa)	National Road 4, Sangkat Cheung Kor, Khan Prey Nop, Preah Sihanouk Province, Kingdom of Cambodia.	10° 48' 59.7" N	103° 47' 46.9" E	4,956.70	4,073.68
Estate B (Svay)	National Road 4, Sangkat Cheung Kor, Khan Prey Nop, Preah Sihanouk Province, Kingdom of Cambodia.	10° 52' 08.2" N	103° 51' 19.2" E	5,153.41	4,295.95
Estate C (Anlong Kropeu)	National Road 4, Sangkat Cheung Kor, Khan Prey Nop, Preah Sihanouk Province, Kingdom of Cambodia.	10° 57' 58.7"N	103° 54' 02.0" E	5,339.70	4,232.16
Estate D (Kirivon)	National Road 4, Kirivon, Stoeng Chhay, Prey Nop, Preah Sihanouk Province, Cambodia.	10° 57' 58.4" N	103° 54' 01.9" E	5,130.39	3,858.08

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The annual certified tonnages produced at the PMU and CPO Mills are detailed as follows:

Member Name: Mong Reththy Investment Cambodia Oil Palm Co., Ltd. – Monorum Palm Oil Mill

Member ID: RSPO_PO100000223

License ID: CB72455

Monorum POM	Annual Tonnages (MT)
Certified FFB	55,000
Certified CPO	10,385
Certified PK	2,585
Supply chain module	Identity Preserved (IP)

Member Name: MRICOP Anlong Kropeu Palm Oil Mill

Member ID: RSPO_PO1000003115

License ID: CB72453

Anlong Kropeu POM	Annual Tonnages (MT)
Certified FFB	240,000
Certified CPO	47,280
Certified PK	11,280
Supply chain module	Identity Preserved (IP)

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Appendix A

Qualifications of Lead Assessor and Assessment Team

Mr. Augustine Loh (AL) – Lead Assessor / 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 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 is a PORLA Licensed Surveyor / Inspector. 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, RSPO RED and RSPO NEXT 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 agriculture and 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 and is a Lead Auditor in the Malaysian Sustainable Palm Oil (MSPO) certification.

Dr. Ooi Cheng Lee (OCL) – Lead Assessor / Technical Expert

(Palm Oil Mill, Environment, OHSAS, Social, HCV, Land Use and Supply Chain)

- PhD in Welding, Cranfield University, UK, M.Sc. (Engineering) in Metallurgy, University of Birmingham, UK

- B.App.Sc (Hons), Science University of Malaysia, Diploma in Translation for Science and Technology, Malaysia Translation Society

Dr. Ooi Cheng Lee is an IRCA Lead Auditor and Lead Tutor for ISO 9001. He is also involved in auditing in other integrated management systems. He has successfully completed the RSPO Lead Assessor Course for Principles and Criteria (RSPO P&C) and the RSPO Supply Chain Certifications (RSPO SCC). He is currently involved in the management of all types of system and process/product certification in Intertek. He has more than 32 years' work experience in product and process specifications, research & development, inspection and testing, quality assurance, engineering development, training, product certification, auditing and quality management system certification. He has conducted assessments of organizations in Malaysia, Singapore, Indonesia, Vietnam, Philippines, China, Myanmar, Cambodia and other regional countries. Assessments include those of rubber and oil palm plantations in Malaysia and Indonesia. His previous position as the General Manager of Lloyd's Register Quality Assurance (LRQA) Malaysia include the management of all types of systems certification, including that of environmental (ISO 14001), safety & health (OHSAS 18001) and Clean Development Mechanisms (CDM). He is currently the General Manager in Intertek Certification International Sdn. Bhd. He is a member of the Internal Review Panel for RSPO Assessment reports since May 2011. He is part of the RSPO CB Assessment team which audited RSPO certified Plantation Management Units since 2012 and is a Lead Auditor in the Malaysian Sustainable Palm Oil (MSPO) certification.

Mr. Chin Bit Kee (CBK) – Assessor / Technical Expert

(Good Agriculture Practice, Integrated Pest Management and Social)

– Degree in Food Technology from University of Reading, United Kingdom

Mr. Chin Bit Kee has more than 5 years working experience in the oil palm plantation, agriculture & social (worker welfare) related field. He has successfully participated in RSPO training conducted internally by Intertek on 17 April 2014 and completed a supervised period of training in practical auditing in agriculture industry and related field, with more than 15 days audit experience in at least 3 audits at different organizations. He has adequate knowledge on Palm Oil sector such as industry fundamentals sustainability, social and OHS issues (e.g. worker welfare issues and social matters such as employment terms, gender issues, worker welfare etc.) environmental matters (e.g. pollution control, conservation of resources). He is a member of the RSPO CB Assessment team which audited several RSPO certified Plantation Management Units since 2014.

Mr. Edwin Chua Rin Jong (CRJ) – Assessor / Technical Expert

(Safety and Social Compliance)

- Dip. Industrial Process Engineering

Mr. Edwin Chua has more than 20 years working experience related in the oil palm sector specifically as oil palm products inspection and survey and is a registered / approved PORLA (MPOB) inspector. He has also over 10 years' experience in occupational safety, health and conducting of 2nd party audits for Supply Chain Management on Safety, Health and Social compliance in accordance with SMETA, CSR, ETI programs etc. in industries related to palm oil, petroleum, consumer goods manufacturing. He has successfully completed the ISO IRCA Lead Auditor course in Dec 2017 and the RSPO Lead Auditor course in Jan 2019. He has completed a supervised period of training in practical auditing in oil palm industry and related field more than 15 days audit experience in at least 3 audits at different organizations. He has adequate knowledge on Palm Oil sector such as industry fundamentals sustainability, social and OHS issues (e.g. worker welfare issues and social matters such as employment terms, gender issues, worker welfare etc.) environmental matters (e.g. pollution control and legislations). He was the Safety & Health

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Manager for Intertek, Malaysia and is a Registered Safety and Health Officer by the Department of Occupational Safety and Health Malaysia (DOSH) since 2000 and is a certified OSH trainer by National Institute of Occupational Safety and Health Malaysia (NIOSH) since 2000. He has conducted audits based on standards such as ISO 9001, MS 1722, OHSAS 18001 and ISO 14001 and local laws, regulations and standards in relation to OSH.

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.

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Appendix B

Assessment Plan (Actual)

Date	Time	Assessors and Assessment Activity				
		Assessment Team				
6 May 2019 (Day 1)	8.00 am – 1.00 pm	Travel to Sihanoukville				
	1.00 pm - 2.00 pm	Lunch Break				
	2.00 pm – 2.30 pm	Opening Meeting and Briefing at POM Office (to be attended by representatives from the Estates as well)				
	2.30 pm – 5.00 pm	Document Review and Assessment by all Assessors on respective RSPO P&C:1 to 8 at POM				
		AL	OCL	CBK	EC	RR
		Site assessment Mill 1 - AK <ul style="list-style-type: none"> • P1 Transparency • P2 Laws & regulations • P3 Economic & Financial Viability • P8 Continual Improvement • SCC for POM 	Site assessment Mill - AK <ul style="list-style-type: none"> • P2 Laws & regulations • P5 Environmental Conservation, HCV & GHG • P8 Continual Improvement 	Site assessment – Mill - AK <ul style="list-style-type: none"> • P2 Laws & regulations • P4 Best Practices at Mill Issues • P8 Continual Improvement 	Site assessment - Mill - AK <ul style="list-style-type: none"> • P2 Laws & regulations • P6 Employees, Individuals & Communities incl. Gender Issues • P8 Continual Improvement 	Site assistance at Mill - AK <ul style="list-style-type: none"> • Assisting Auditors • P2 Laws & regulations • P4 - P8
		<ul style="list-style-type: none"> • Review of documentation changes (incl. Organization, Policies, SOPs, Laws etc.) • Verification of implementation effectiveness for corrective actions on previous NCs • Review of Time Bound Plan (TBP) • Verification on compliance with Minimum requirements for Multiple Management Units (MMU) 				
	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	OCL	CBK	EC	RR
07 May 2019 (Day 2)	8.30 am – 12.30pm	Site assessment at Estate A <ul style="list-style-type: none"> • P1 Transparency • P2 Laws & regulations • P3 Economic & Financial Viability • P8 Continual Improvement • SCC for POM 	Site assessment at Estate A <ul style="list-style-type: none"> • P2 Laws & regulations • P5 Environmental Conservation, HCV & GHG • P8 Continual Improvement 	Site assessment at Estate A <ul style="list-style-type: none"> • P2 Laws & regulations • P4 Best Practices at Mill Issues • P7 New Plantings • P8 Continual Improvement 	Site assessment – Estate A <ul style="list-style-type: none"> • P2 Laws & regulations • P6 Employees, Individuals & Communities incl. Gender Issues • P8 Continual Improvement 	Site assessment at Estate A <ul style="list-style-type: none"> • Assisting Auditors • P2 Laws & regulations • P4 - P8

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	12.30 pm – 1.30 pm	Lunch Break				
	1.30 pm - 5.00 pm	Site assessment at Estate B <ul style="list-style-type: none"> • As per above 	Site assessment at Estate B <ul style="list-style-type: none"> • As per above 	Site assessment at Estate B <ul style="list-style-type: none"> • As per above 	Site assessment at Estate B <ul style="list-style-type: none"> • As per above 	Site assessment at Estate B <ul style="list-style-type: none"> • As per above
	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	OCL	CBK	EC	RR
08 May 2019 (Day 3)	8.30 am – 12.30pm	Site assessment at Estate C <ul style="list-style-type: none"> • P1 Transparency • P2 Laws & regulations • P3 Economic & Financial Viability • P8 Continual Improvement • SCC for POM 	Site assessment at Estate C <ul style="list-style-type: none"> • P2 Laws & regulations • P5 Environmental, Conservation, HCV & GHG • P8 Continual Improvement 	Site assessment at Estate C <ul style="list-style-type: none"> • P2 Laws & regulations • P4 Best Practices at Mill Issues • P7 New Plantings • P8 Continual Improvement 	Site assessment – Estate C <ul style="list-style-type: none"> • P2 Laws & regulations • P6 Employees, Individuals & Communities incl. Gender Issues • P8 Continual Improvement 	Site assessment at Estate C <ul style="list-style-type: none"> • Assisting Auditors • P2 Laws & regulations • P4 - P8
	12.30 pm – 1.30 pm	Lunch Break				
	1.30 pm - 5.00 pm	Site assessment at Estate D <ul style="list-style-type: none"> • As per above 	Site assessment at Estate D <ul style="list-style-type: none"> • As per above 	Site assessment at Estate D <ul style="list-style-type: none"> • As per above 	Site assessment at Estate D <ul style="list-style-type: none"> • As per above 	Site assessment at Estate D <ul style="list-style-type: none"> • As per above
	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	OCL, CBL, EC & RR
09 May 2019 (Day 4)	8.30 – 10.30 am	Site assessment at Mill – Monorum <ul style="list-style-type: none"> • P1 Transparency • P2 Laws & regulations • P3 Economic & Financial Viability • P8 Continual Improvement • SCC for POM 	Stakeholders Consultation at Mill: Monorum Consultation on the following categories (see Notes 1 and 2 below): <ul style="list-style-type: none"> • Previous Land Owners / Users • Contractors • Suppliers • Transporters • NGOs • Government Department / Agencies • Local Community <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>

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		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				
	11.30 – 12.30 pm	Lunch Break				
	12.30 - 5.00 pm	Site assessment Mill - Monorum <ul style="list-style-type: none"> • P1 Transparency • P2 Laws & regulations • P3 Economic & Financial Viability • P8 Continual Improvement • SCC for POM 	Site assessment Mill - Monorum <ul style="list-style-type: none"> • P2 Laws & regulations • P5 Environmental, Conservation, HCV & GHG • P8 Continual Improvement 	Site assessment Mill - Monorum <ul style="list-style-type: none"> • P2 Laws & regulations • P4 Best Practices at Mill Issues • P8 Continual Improvement 	Site assessment Mill - Monorum <ul style="list-style-type: none"> • P2 Laws & regulations • P6 Employees, Individuals & Communities incl. Gender Issues • P8 Continual Improvement 	Site assistance Mill - Monorum <ul style="list-style-type: none"> • Assisting Auditors • P2 Laws & regulations • P4 - P8
	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				
10 May 2019	8.30 am – 9.30 am	AL	OCL	CBK	EC	RR
(Day 5)		Closing Meeting & Briefing at Palm Oil Mill Office				
	9.30 am – onwards	Travel to Airport and flight back to Kuala Lumpur				

Appendix: Assessment Team Competency Matrix

P&C	Areas	Lead Assessor (LA) / Assessors (A) / Technical Experts (TE) / Local Expert (LE)				
		AL (LA/TE)	OCL (A/TE)	CBK (A/TE)	EC (A/TE)	RR (LE)
1.	Transparency	√	√	√	√	√
2.	Laws & Regulations	√	√	√	√	√
3.	Economic & Financial Viability	√	√	√		√
4.	Best Practices at Estates & Mill	√	√	√		√
5.	Environmental, Conservation & HCV	√	√			
6.	Employees, Communities incl. Gender issues	√	√	√	√	√
7.	New Plantings	√	√	√		
8.	Continual Improvement	√	√	√	√	√
SCC	Supply Chain Certification (SCC) for CPO Mills	√	√			

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Appendix C-1

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



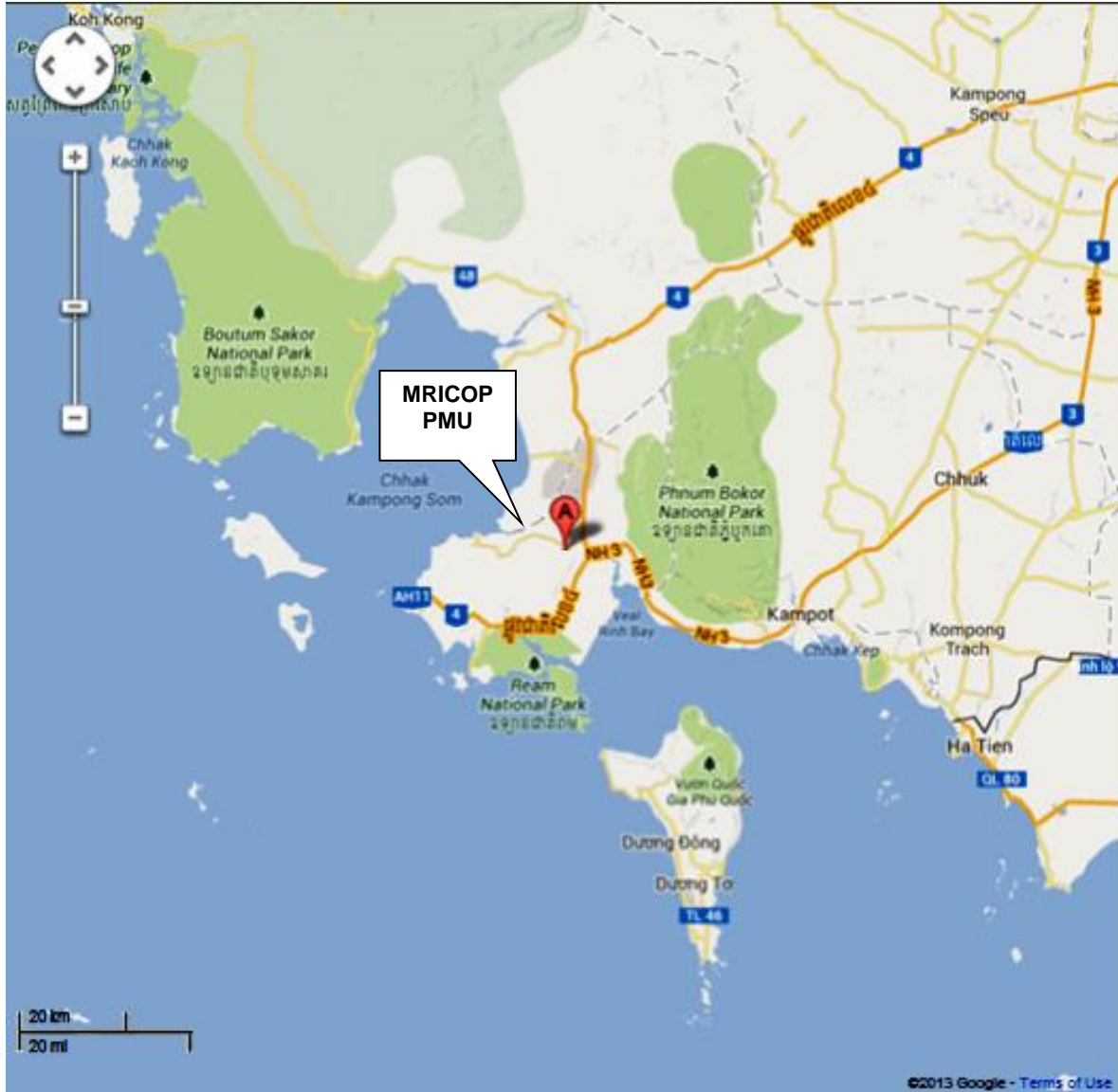
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Appendix C-1-2

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



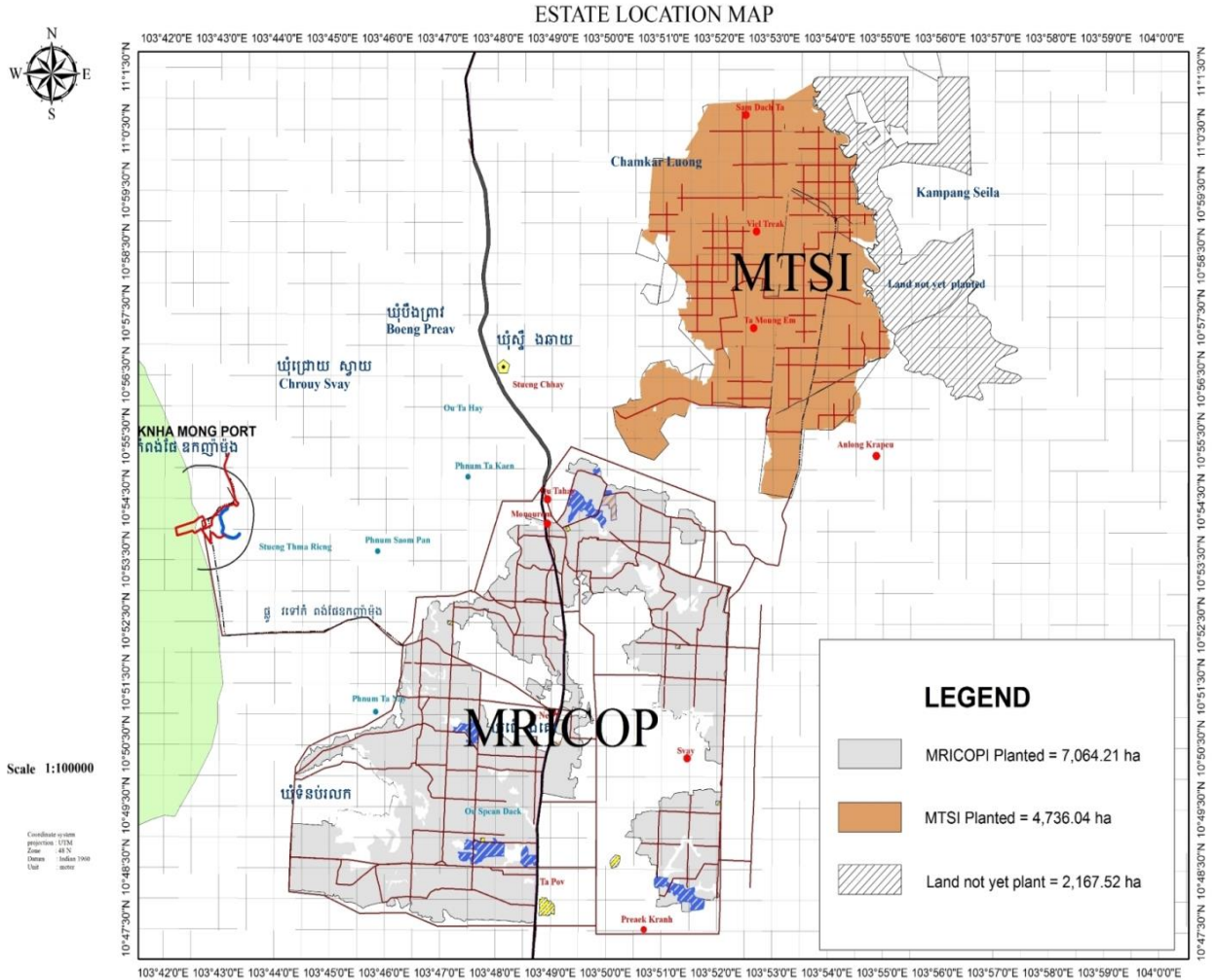
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Appendix C-2

Location of Estates and surrounding landscape



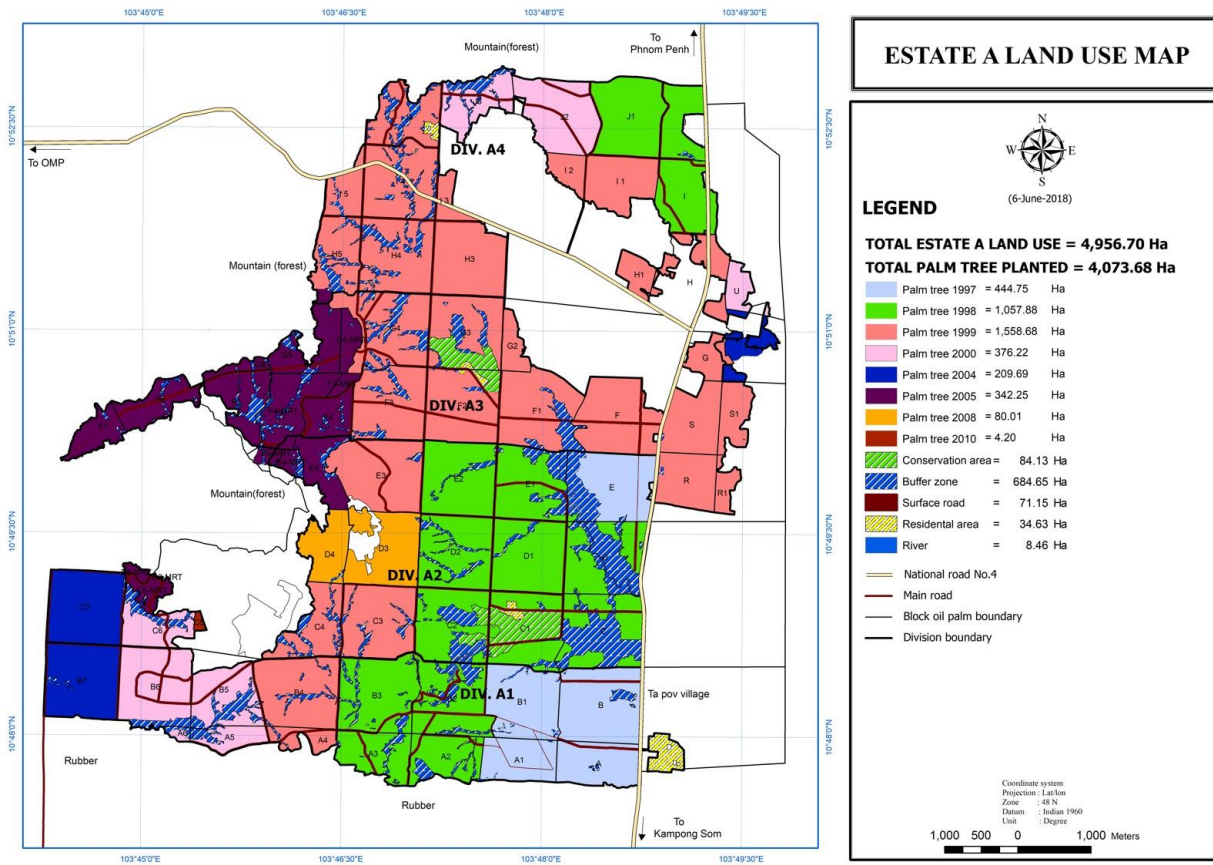
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Appendix C-2-1

Land Use Map – Estate A



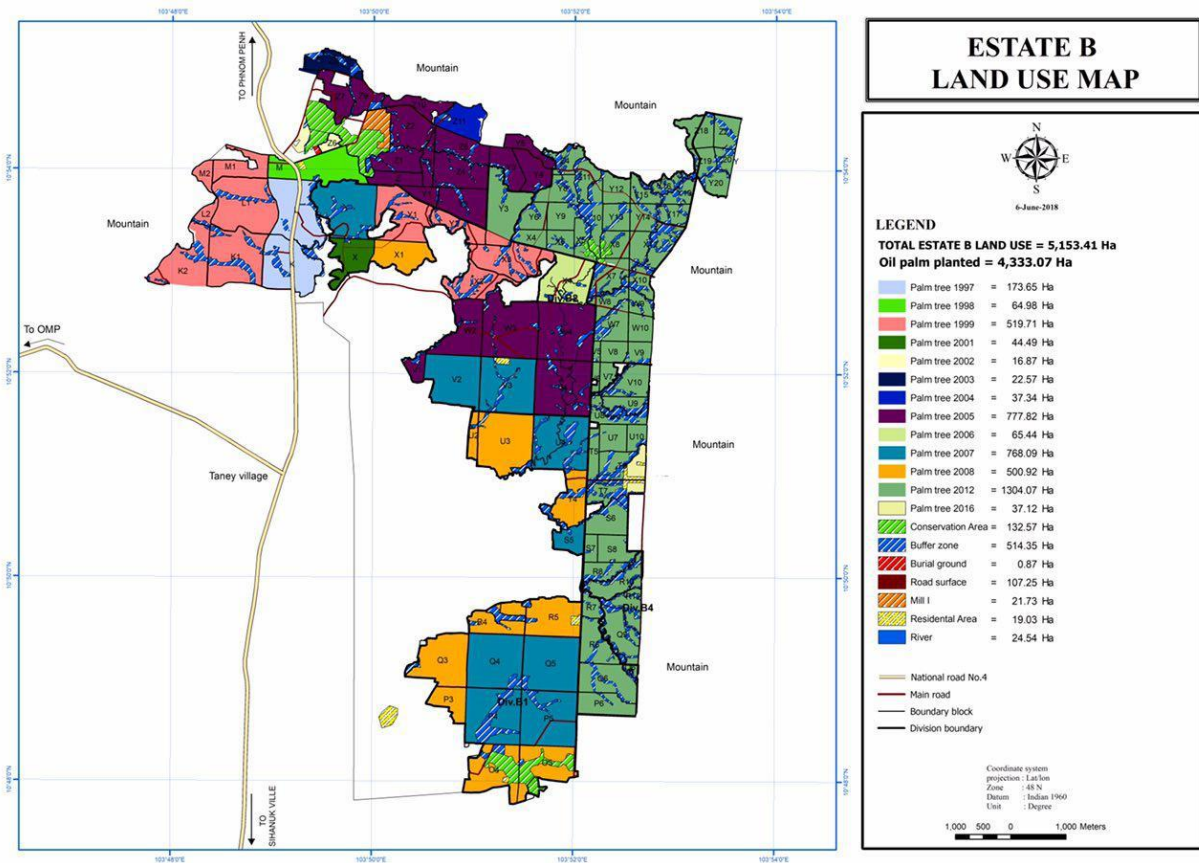
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Appendix C-2-2

Land Use Map – Estate B



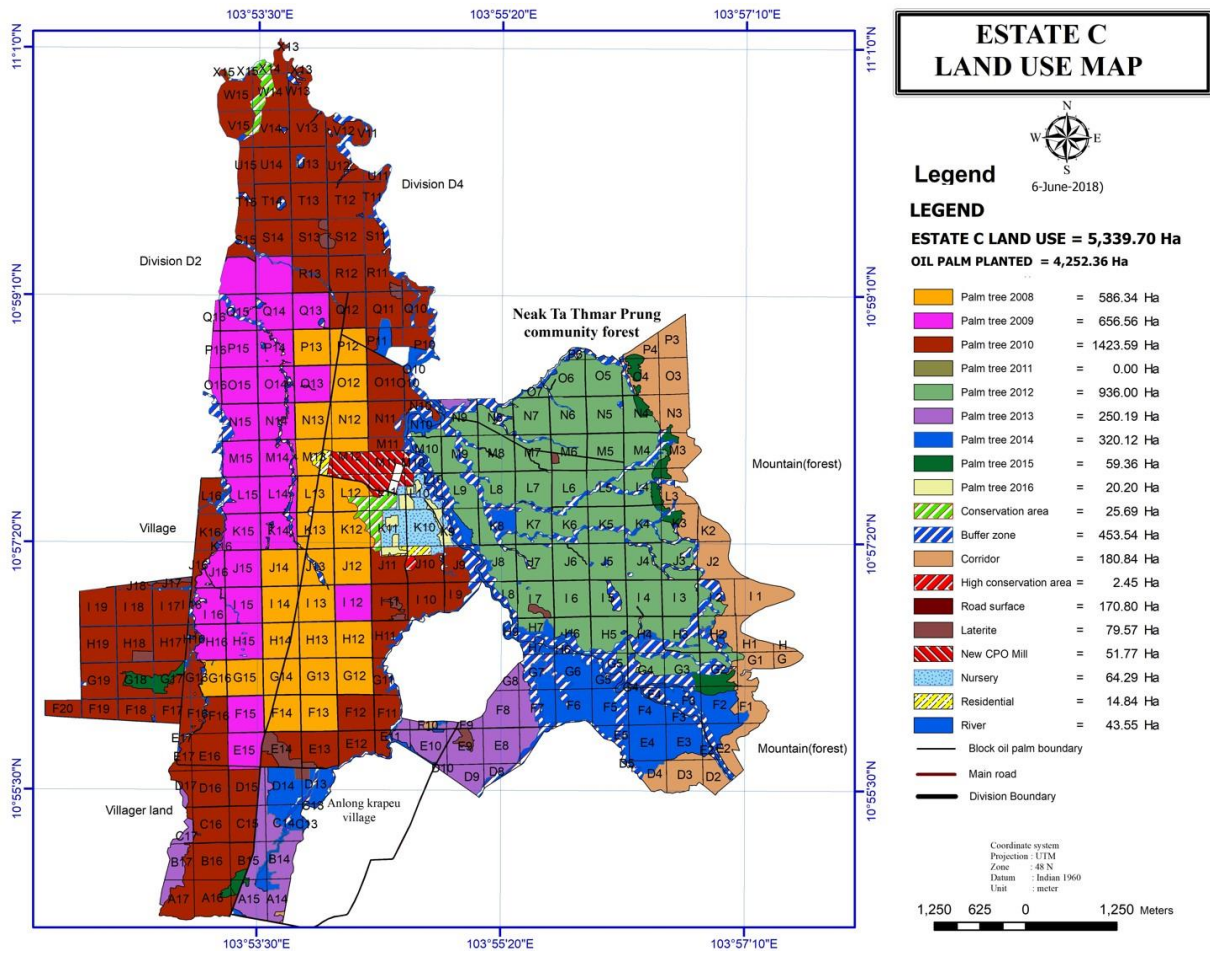
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Appendix C-2-3

Land Use Map – Estate C



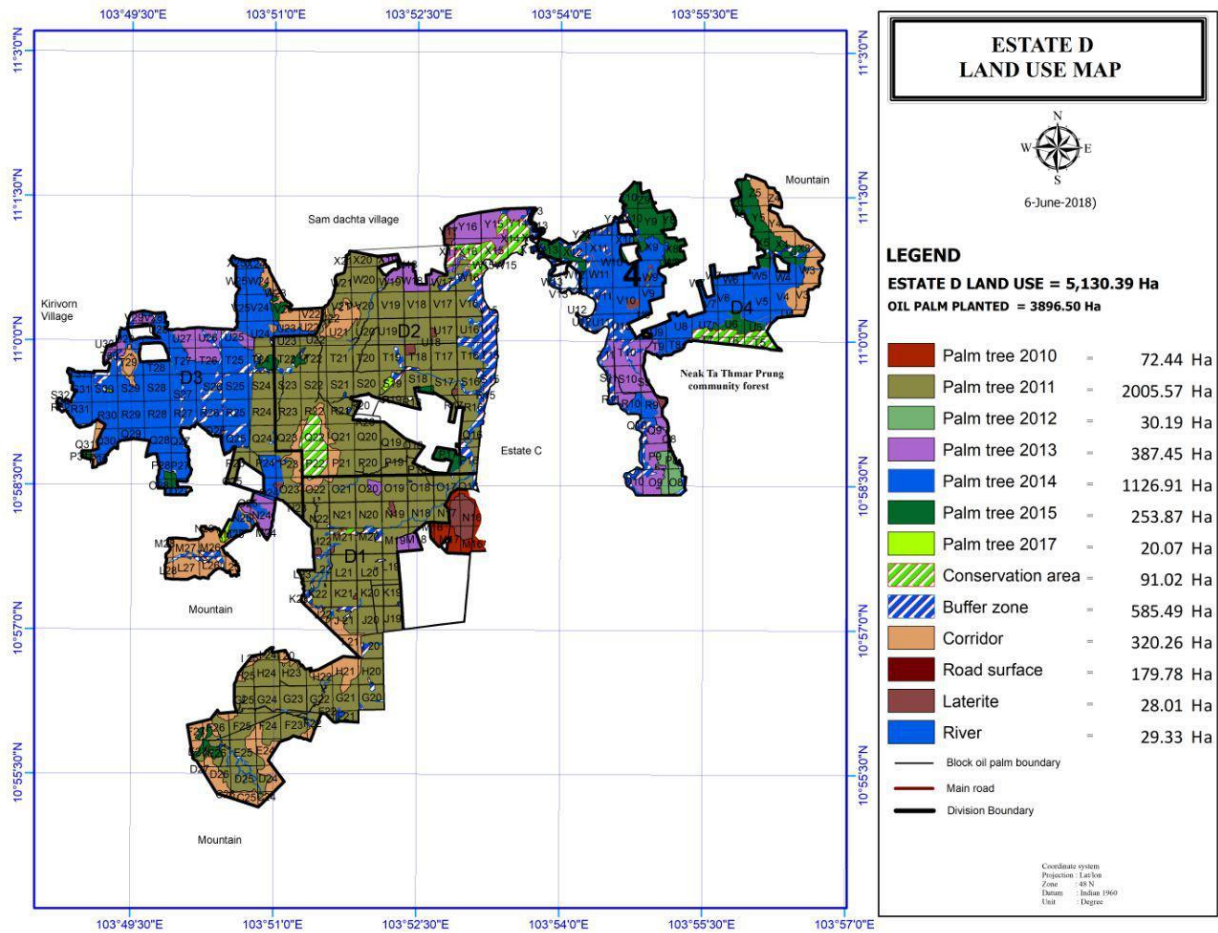
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Appendix C-2-4

Land Use Map – Estate D



- End of report -