Established in 1969, IOI Corporation is engaged in the cultivation and processing of oil palm, but has also ventured into downstream palm oil-based manufacturing activities such as refining, palm kernel extraction, oleo chemicals, and specialty fats and oils. The company is also involved in rubber production, and through its subsidiaries operates in property development and investment, providing building, engineering, and construction services, manufacturing industrial and medical gases among other activities. IOI Corporation's oil palm plantation estates are located in Malaysia and Indonesia.

Landbank (oil palm): 221,905 hectares
Palm cultivation revenue: 3%
Market cap: 6,438,015,948 USD
Thomson Reuters ticker: IOIB.KL
Bloomberg ticker: IOI MK
ISIN: MYL196100001
RSPO member? Yes
Other initiatives: Malaysian Sustainable Palm Oil (MSPO), International Sustainability and Carbon Certification (ISCC), Sustainable Palm Oil Manifesto (SPOM)
Activities: oil palm cultivation, milling, palm kernel crushing, palm oil refining, trading and distribution
Locations: Malaysia (Johor, Malacca, Negeri Sembilan, Pahang, Sabah and Sarawak) and Indonesia (West Kalimantan and Central Kalimantan)
Headquarters: Malaysia
Related companies: IOI has a 31.8% stake in Bumitama Agri Ltd and 2.1% equity interest in IJM Plantations through their subsidiary, Sakilan Desa Sdn Bhd. IOI has sold 70% of its controlling stake in IOI Loders Croklaan to Bunge Asia Pte. Ltd
Notes: IOI Group's RSPO certificates were suspended on 4th April 2016. As of 8th August 2016 the company's certificates have been reinstated.

Website: [http://www.ioigroup.com/](http://www.ioigroup.com/)

**Total score:** 71.9%

### Sustainability policy and leadership

#### 1. Sustainable palm oil policy or commitment for all its operations?
Sustainable Palm Oil Policy

#### 2. Sustainable palm oil policy or commitment applies to all suppliers?

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**Latest update:** October 2019  
**Next scheduled:** October 2020

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The company has a Sustainability Team led by a Group Head of Sustainability, who in turn reports directly to the CEO. This person also sits on the Group Sustainability Steering Committee, which reports to the Board of Directors. The company also has a Sustainability Advisory Panel (SAP), which includes external partners.

- **High-level position of responsibility for sustainability?**
  - Yes

- **One or more members within the board of the company have responsibility for sustainability?**
  - Yes

- **Percentage or number of women in senior management team?**
  - 26% - The company reports 26% of managers are female in its 2018 annual report

- **Percentage or number of women board members?**
  - 11% - The company reports in its 2018 annual report that as of 30th August 2018, 11% of the Board of Directors was female

- **Member of multiple industry schemes or other external initiatives to reduce negative environmental or social outcomes associated with palm oil production?**
  - Member of Fire Free Alliance and HCS Approach Steering Committee

- **Collaboration with stakeholders to reduce negative environmental or social outcomes associated with palm oil production?**
  - The company has formed a Sustainability Advisory Panel composed of NGOs, customers and other experts to support the roll out of its policy and advise on issues raised by multi-stakeholder groups. It is also developing a landscape level approach in its Ketapang concession in Indonesia in collaboration with Aidenvironment, Global Environment Center and the Ketapang Regency government. In August 2018, it reported working with the University of Malaysia to promote a more sustainable palm oil industry

- **Sustainability report published within last two years?**
  - Yes - 2018

- **Reports through standardised reporting systems?**
  - Yes

- **Verification report on compliance with POIG Charter, if a POIG member?**
  - This indicator is disabled as the company is not a POIG member

- **Climate risks assessment available?**
  - No

- **Total land area managed/controlled for oil palm (ha)?**
  - Yes - 221,905

- **Landbank, maps and traceability**
  - Yes - 62.4%

- **8 media reports**

- **13. Total land area managed/controlled for oil palm (ha)?**
  - Yes - 221,905
1. Total oil palm planted area (ha)?
176,157 - Data as of 2019

2. Plasma/scheme smallholders planted area (ha)?
4,436.67

3. Unplanted (areas designated for future planting) (ha)?
5,148.72 - Note that the 2018 annual report states a figure of 8,382 ha as "estate under development", but this appears to be an aggregate figure including other crops

4. Conservation set-aside area, including HCV area (ha)?
14,899.8 - Sum of HCV areas and other conservation areas in 2018 ACOP

5. Area for infrastructure (ha)?
32,070 - The company states this area is for "Labour lines, building sites and others", but it is unclear exactly what this includes, and whether it includes commodities other than oil palm

6. Maps of estates/management units?
Concession boundaries have been made available to the RSPO and the company declared in its 2018 ACOP that this represents 100% of its concessions

7. Maps of scheme/plasma smallholders?

8. Names and locations of all third-party supplying plantations?

9. Number of company-owned mills?
15

10. Names and coordinates of company-owned mills?
Mill names are: Pamol Kluang POM, Gomali POM, Sukses Karya Sawit POM, Baturong POM, Unico Oil Mill, Unico-Desa Oil Mill, Morisem POM, Leepang POM, Syarimo POM, Mayvin POM, Ladang Sabah POM, Sakilan POM, Pamol Sabah POM, Bukit Leelau POM, Pukin POM

11. Number (or percentage) of company-owned mills that source from company-owned plantations and/or third-party plantations?

12. Total volumes (or percentages) sourced by company-owned mills that come from company-owned plantations and/or third-party plantations?
The company states that 96% of FFB processed by its mills comes from its own estates (therefore sourcing from third-party plantations is 4%)

13. Number of supplier mills?
405 - Dashboard at time of assessment was last updated June 2019
27. Names and coordinates of all third-party supplying mills?  
The company provides five lists of supplying mills on its website, including the names and coordinates of each one.

28. Number (or percentage) of third-party supplier mills that source from their own plantations and/or third-party plantations?  
The company's palm oil dashboard, updated in June 2019, states it has 116 supplying mills with "direct sourcing" and 289 with "indirect sourcing", but it is not clear what exactly is meant by this.

29. Total volumes (or percentages) sourced from third-party supplier mills that come from their own plantations and/or third-party plantations?  
No source.

30. Total volume (or percentage) sourced for refineries that comes from intermediary traders and/or refiners rather than directly from mills?  
No source.

31. Time-bound commitment to achieve 100% traceability to mill level?  
2018 - The company states in its sustainable palm oil policy that all volumes of palm oil and palm oil fractions will be 100% traceable to mills by the end of 2016 while palm kernel oil volumes will be traceable to crushers by end of 2016 and to the mills by end of 2018. The dashboard update in June 2019 shows 100% traceability to mill for palm oil, but 98% traceability to mill for palm kernel oil. Therefore the palm oil target has been met, but the palm kernel oil target missed.

32. Percentage of supply traceable to mill level?  
98% - The dashboard update in June 2019 reports the company has 100% traceability of palm oil, and 98% traceability of palm kernel oil, to mill.

33. Time-bound commitment to achieve 100% traceability to plantation level?  
2020 - The company commits to 100% traceability to plantation by the end of 2020.

34. Percentage of fresh fruit bunches (FFB) from own mills traceable to plantation level?  
100% - The company states on its June 2019 dashboard update that the volumes from its 15 own mills are traceable to plantation level.

35. Percentage of fresh fruit bunches (FFB) from supplier mills traceable to plantation level?  
The company reports traceability to plantation of 52% for palm oil and 31% for palm kernel oil. It is unclear if these figures include traceability to the company’s own mills as well as supplier mills.

36. Publishes traceability data at refinery level?  
P 0.75/1

37. Publishes traceability data at crusher level?  
P 0.75/1
<table>
<thead>
<tr>
<th>Question</th>
<th>Score</th>
<th>Source</th>
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<tbody>
<tr>
<td><strong>38. Commitment to zero deforestation or zero conversion of natural ecosystems?</strong></td>
<td>✓ 1/1</td>
<td>Source</td>
</tr>
<tr>
<td><strong>39. Commitment to zero deforestation or zero conversion of natural ecosystems applies to all suppliers?</strong></td>
<td>✓ 1/1</td>
<td>Source</td>
</tr>
<tr>
<td><strong>40. Criteria for defining deforestation?</strong></td>
<td>✓ 1/1</td>
<td>Source</td>
</tr>
<tr>
<td>The company commits to protecting HCV and HCS forest based on the RSPO Principles and Criteria 2018. Full points have therefore been awarded on the basis of the company's RSPO certified landbank (≥75%) and a further commitment to be 100% certified within five years.</td>
<td></td>
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<tr>
<td><strong>41. Evidence of monitoring deforestation?</strong></td>
<td>P 0.75/2</td>
<td>Source</td>
</tr>
<tr>
<td>The company reported in its 2017 sustainability report a project with Satelligence to monitor forest clearance, and mentioned that patrols are organised to monitor for illegal logging, hunting and fires (once a week in dry season, twice a month in the wet season). In its 2019 Q1 sustainability progress update, it also referred to a project it will be doing with AidEnvironment to monitor deforestation in the supply base, though the frequency of this is unclear.</td>
<td></td>
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</tr>
<tr>
<td><strong>42. Amount of illegal/non-compliant deforestation recorded in own operations?</strong></td>
<td>X 0/1</td>
<td>No source</td>
</tr>
<tr>
<td><strong>43. Amount of illegal/non-compliant deforestation recorded in supplier operations?</strong></td>
<td>P 0.5/1</td>
<td>Source</td>
</tr>
<tr>
<td>Some information is recorded under the company's grievances however it does not cover the whole scope of the company's supply chain.</td>
<td></td>
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<tr>
<td><strong>44. Commitment to restoration of non-compliant deforestation/conversion?</strong></td>
<td>✓ 1/1</td>
<td>Source</td>
</tr>
<tr>
<td>The company makes this commitment through the RSPO Principles and Criteria 2018. Full points have therefore been awarded on the basis of the company's RSPO certified landbank (≥75%) and a further commitment to be 100% certified within five years.</td>
<td></td>
<td></td>
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<tr>
<td><strong>45. Commitment to restoration of non-compliant deforestation/conversion applies to all suppliers?</strong></td>
<td>✓ 1/1</td>
<td>Source</td>
</tr>
<tr>
<td>The company commits to requiring compensation from suppliers which are non-compliant with its policy from February 2017, including restoration activities &quot;where necessary&quot;.</td>
<td></td>
<td></td>
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<tr>
<td><strong>46. Implementing a landscape or jurisdictional level approach?</strong></td>
<td>✓ 1/1</td>
<td>Source</td>
</tr>
<tr>
<td>+ 0.29/1</td>
<td></td>
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<tr>
<td>The company has developed and begun implementing its &quot;Ketapang Landscape Level Approach&quot; in West Kalimantan, which &quot;has been adapted to foster integrated peatland management and rehabilitation, orangutan habitat protection, and fire prevention&quot;. It also reports managing peatlands on a landscape level. Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.</td>
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<tr>
<td><strong>47. Commitment to biodiversity conservation?</strong></td>
<td>✓ 1/1</td>
<td>Source</td>
</tr>
<tr>
<td><strong>48. Commitment to biodiversity conservation applies to all suppliers?</strong></td>
<td>X 0/1</td>
<td>No source</td>
</tr>
<tr>
<td><strong>49. Identified species of conservation concern, referencing international or national system of species classification?</strong></td>
<td>✓ 1/1</td>
<td>Source</td>
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<tr>
<td>+ 0.78/1</td>
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| The company states "We are focused on protecting nationally protected flora and fauna and those endemic to the areas in which we operate. We do match these species to the IUCN Red List status". It separately mentions it has identified
orangutans and silver langur monkeys, but does not refer to their IUCN status or any other appropriate classification system. However, points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.

**50. Examples of species and/or habitat conservation management?**
The company reports it has engaged the Global Environment Centre on peat restoration and protection measures in peat and HCV areas. It reports it is undertaking rehabilitation and enrichment of degraded HCV areas, using signage for restriction of restricted areas and monitoring the condition of conservation and buffer areas. It reports it has conducted wildlife management training, has honorary wildlife and forest managers, and is contributing to several conservation efforts, such as the Malua Wildlife Conservation Initiative. It also mentions patrols for illegal poaching. Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.

**51. Commitment to no hunting or only sustainable hunting of species?**

**52. Commitment to no hunting or only sustainable hunting of species applies to all suppliers?**

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**HCV, HCS and impact assessments**

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<tr>
<th>Question</th>
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<tbody>
<tr>
<td>53. Commitment to conduct High Conservation Value (HCV) assessments?</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>54. Commitment to conduct High Conservation Value (HCV) assessments applies to all suppliers?</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>55. High Conservation Value (HCV) assessments for planting undertaken prior to January 2015, and associated management and monitoring plans?</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>56. High Conservation Value (HCV) assessments for all estates planted since January 2015?</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>57. High Conservation Value (HCV) management and monitoring plans for all estates planted since January 2015?</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>58. Commitment to only use licensed High Conservation Value (HCV) assessors accredited by the HCV Resource Network's Assessor Licensing Scheme (ALS)?</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>59. Commitment to only use licensed High Conservation Value (HCV) assessors accredited by the HCV Resource Network's Assessor Licensing Scheme (ALS) applies to all suppliers?</td>
<td>✗</td>
<td>✗</td>
</tr>
</tbody>
</table>
60. Satisfactory review of all High Conservation Value (HCV) assessments undertaken since January 2015 by the HCV ALS Quality Panel?
PT. KPAM, a subsidiary of the company, has a satisfactory assessment.

61. Commitment to the High Carbon Stock (HCS) Approach?

62. Commitment to the High Carbon Stock (HCS) Approach applies to all suppliers?

63. High Carbon Stock (HCS) assessments?
PT. KPAM, a subsidiary of the company, has an assessment available on the HCS Approach website, which is marked as complete.

64. Commitment to conduct social and environmental impact assessments (SEIAs)?
The company makes this commitment in its 2016 annual report, though not explicitly in its Sustainable Palm Oil Policy. It also makes this commitment through the RSPO Principles and Criteria 2018.

65. Commitment to conduct social and environmental impact assessments (SEIAs) applies to all suppliers?

66. Social and environmental impact assessments (SEIAs) undertaken, and associated management and monitoring plans?
There is public availability of the following SEIA summary assessment report: PT. Bumi Sawit Sejahtera.

67. Commitment to no planting on peat of any depth?
The company outlines a commitment to no planting on peat in its Sustainable Palm Oil Policy. It also makes this commitment through the RSPO Principles and Criteria 2018. Full points have therefore been awarded on the basis of the company’s RSPO certified landbank (≥75%) and a further commitment to be 100% certified within five years.

68. Commitment to no planting on peat of any depth applies to all suppliers?

69. Implementation of commitment to no planting on peat of any depth?

70. Landbank or planted area on peat?
8,396 - The company reported this as its planted area on peat in its 2017 sustainability report, but a more up-to-date figure could not be found.

71. Commitment to best management practices for soils and peat?
The company makes this commitment through the RSPO Principles and Criteria 2018. Full points have therefore been awarded on the basis of the company's RSPO certified landbank (≥75%) and a further commitment to be 100% certified within five years.

### 72. Commitment to best management practices for soils and peat applies to all suppliers?
The company's commitment on peat is stated to apply to all suppliers, but the scope of the commitment on soils is unclear.

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### 73. Evidence of best management practices for soils and peat?
Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.

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### 74. Commitment to zero burning?
The company has a zero burning policy, though states within it that "Where burning is necessary, IOI will follow the rules in EQA 1974". It also makes a commitment to zero burning through the RSPO Principles and Criteria 2018.

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### 75. Commitment to zero burning applies to all suppliers?

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### 76. Evidence of fire monitoring and management?
The company reports several fire management and monitoring efforts in its 2018 sustainability reports, and some of these are also confirmed in the verification reports it has from Proforest.

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### 77. Details/number of hotspots/fires in company estates?
Data as of 2019.

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### 78. Details/number of hotspots/fires within surrounding landscape/smallholders?
Data as of 2019.

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### 79. Time-bound commitment to reduce greenhouse gas (GHG) emissions intensity?
The company has general commitments to reduce GHG emissions, but with no target reduction figure and not framed in terms of emissions intensity. It states it has drafted a GHG reduction plan, but no details can be found.

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### 80. Methodology used to calculate GHG emissions?
The company stated in its 2016 RSPO ACOP it was using the RSPO Palm GHG Calculator and ISCC GHG Emission Calculation Methodology. Note that the company has not reported the methodology it uses in its 2017 or 2018 ACOPs. The Proforest verification report from 2019 also states the company uses either RSPO's PalmGHG, or the ISCC GHG methodology.

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### 81. Progress towards commitment to reduce GHG emissions intensity?
The company reports an improvement in GHG intensity figures for its oleochemical operations. It reports total and Scope 1 and 2 emissions for its overall operations, but these are not reported in intensity, and are shown to be significantly worse than in the previous reporting year. It reported an overall figure of 12,465 MT CO2e for its plantation operations in its 2017 sustainability report, but an equivalent figure of 54,307 MT CO2e in its 2018 sustainability report. This increase appears to be mostly from Scope 1 emissions. The company also does not have a target-based, time-bound commitment to reduce GHG emission intensity.

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### 82. Percentage of mills with methane capture (100%)?
6 (40%) - The company reports six methane capture facilities in Malaysia, and three are planning to have methane capture installed in 2020.

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<th>0.5 / 1</th>
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</table>
The company only reports emissions intensity data for IOI Plantations, IOI Refinery and IOI Oleo Group.

The company stated in its 2017 sustainability report "A review of operations is currently underway, and reduction targets will be set during our 2018 reporting cycle for the next five years". No time-bound commitment on water use intensity was found in the 2018 sustainability report.

The company reports figures on water consumption per MT of FFB from 2013 to 2017. This improved between 2015 and 2016 by more than 5%, but water consumption increased again in 2017 to the highest figure reported so far (1.53m3 per tonne). The company states this increase is due to an increase in the number of workers and therefore of housing and amenities. Although water usage is reported per tonne, the company does not have a target framed around water use intensity.

Water, chemical and pest management

85. Time-bound commitment to improve water use intensity?

The company stated that "The BOD level of our POME is within the acceptable limit as required by the Department of Environment. The lowest BOD level recorded is 23 PPM in 2015." but it is not clear if this figure is improving. The 2018 sustainability report states that BOD levels are within the "acceptable limit" for the Department of Environment, but does not specify a figure or what the limit is. The company does not have a commitment to reduce levels of BOD and COD. It does not report levels for COD.

89. Progress towards commitment on water quality (BOD and COD)?

A Proforest verification report released in early 2019 states that river buffer zones at all estates sampled were demarcated and that their widths were "in conformance with regulations/guidelines relevant to Peninsular Malaysia and Sabah respectively". Note that clear verification on any Indonesian estates was not mentioned. However, points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.

86. Progress towards commitment on water use intensity?

87. Water use intensity?

88. Time-bound commitment to improve water quality (BOD and COD)?

90. Treatment of palm oil mill effluent (POME) and/or palm oil refinery effluent (PORE)?

[Externally verified] The company reports treatment of POME but not PORE.

91. Commitment to protect natural waterways through buffer zones?

92. Implementation of commitment to protect natural waterways through buffer zones?

A Proforest verification report released in early 2019 states that river buffer zones at all estates sampled were demarcated and that their widths were "in conformance with regulations/guidelines relevant to Peninsular Malaysia and Sabah respectively". Note that clear verification on any Indonesian estates was not mentioned. However, points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.
93. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers?  
The company makes reference to reducing chemical use as part of meeting the Sustainable Development Goals (SDGs) and mentions minimising pesticide use as part of IPM, but does not have a clear commitment. It released a new Agrochemical Management Policy in July 2018, but this does not contain a commitment to reduce chemical use. However, the company makes a commitment to reducing chemical use through the RSPO Principles and Criteria 2018. Full points have therefore been awarded on the basis of the company's RSPO certified landbank (≥75%) and a further commitment to be 100% certified within five years.

94. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers, applies to all suppliers?

95. Implementation of commitment to reduce chemical usage?  
Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.

96. Chemical usage per ha or list of chemicals used?  
The company reports the total amount of pesticides and fertilisers used in its 2017 sustainability report, but does not give this figure per hectare. It lists names of pesticides and fertilisers used in its 2018 sustainability report but does not give volumes, and it is not clear if this list is exhaustive.

97. Commitment to no use of paraquat?

98. Commitment to no use of paraquat applies to all suppliers?

99. Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides?

100. Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides applies to all suppliers?

101. Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention?  
The company makes this commitment through the RSPO Principles and Criteria 2018. Full points have therefore been awarded on the basis of the company's RSPO certified landbank (≥75%) and a further commitment to be 100% certified within five years.

102. Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention applies to all suppliers?

103. Integrated Pest Management (IPM) approach?  
Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.
### 104. Commitment to human rights?
The company commits in its 2018 ACOP to follow the UN Declaration of Human Rights, but only explicitly in relation to its employees. However, it also makes this commitment through the RSPO Principles and Criteria 2018. Full points have therefore been awarded on the basis of the company's RSPO certified landbank (≥75%) and a further commitment to be 100% certified within five years.

### 105. Commitment to human rights applies to all suppliers?
The commitment clearly applies to all suppliers, but is only explicitly in relation to the company's employees, rather than a clear commitment to uphold human rights for all relevant people.

### 106. Progress on human rights commitment?
Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.

### 107. Commitment to respect legal and customary land tenure rights?
The company states "At the core of IOI’s community development and social impact approach is a respect for local communities to hold legal, communal or customary rights on any project that might affect their way of life or occurs in their territories."

### 108. Commitment to legal and customary land rights applies to all suppliers?
The company commits in its Sustainable Palm Oil Policy to respecting the legal and customary rights of local communities, but only in relation explicitly to the FPIC process. This commitment applies across all sourcing. The scope of the company's commitment of respect for "local communities to hold legal, communal or customary rights on any project" is stated in the 2018 sustainability report, and the scope of this full commitment is unclear.

### 109. Details of process for addressing land conflicts available?
The company previously had a "boundary disputes handling" document, but this can no longer be found. The company provides a case study of how it handled a specific land conflict between IOI Pelita and nine communities in Sarawak. Also, the RSPO Principles and Criteria 2018 contain requirements for addressing land conflicts. Full points have therefore been awarded on the basis of the company's RSPO certified landbank (≥75%) and a further commitment to be 100% certified within five years.

### 110. Commitment to respect indigenous and local communities' rights?
The company commits to respect rights according to the UNDRIP, but only in reference to land tenure rights and FPIC. However, it also makes this commitment through the RSPO Principles and Criteria 2018. Full points have therefore been awarded on the basis of the company's RSPO certified landbank (≥75%) and a further commitment to be 100% certified within five years.

### 111. Commitment to indigenous and local communities' rights applies to all suppliers?
The company commits to respect rights according to the UNDRIP, but only in reference to land tenure rights and FPIC. This commitment applies to all sourcing.

### 112. Examples of local stakeholder engagement to prevent conflicts?
A Proforest verification report from early 2019 reports that the company maintains a stakeholder list and conducts annual external stakeholder consultation meetings, that for each operating unit an assistant manager is assigned as a community liaison representative, and that there is also a grievance hotline. However, note that this report also stated "Proforest found that most of the capacity building or training programmes for staff do not focus on topics such as community engagement, mediation, conflict resolution and communication". Points for external verification have been awarded on
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<tbody>
<tr>
<td>113.</td>
<td>Commitment to free, prior and informed consent (FPIC)?</td>
<td>✓ 1 / 1</td>
<td></td>
</tr>
<tr>
<td>114.</td>
<td>Commitment to free, prior and informed consent (FPIC) applies to all suppliers?</td>
<td>✓ 1 / 1</td>
<td></td>
</tr>
<tr>
<td>115.</td>
<td>Details of free, prior and informed consent (FPIC) process available?</td>
<td>✓ 1 / 1</td>
<td></td>
</tr>
<tr>
<td>116.</td>
<td>Commitment to support the inclusion of women across palm oil operations, including addressing barriers faced?</td>
<td>✓ 1 / 1</td>
<td></td>
</tr>
<tr>
<td>117.</td>
<td>Commitment to support the inclusion of women across palm oil operations, including addressing barriers faced, applies to all suppliers?</td>
<td>✗ 0 / 1</td>
<td>No source</td>
</tr>
<tr>
<td>118.</td>
<td>Commitment to mitigate impacts on food security?</td>
<td>✓ 1 / 1</td>
<td></td>
</tr>
<tr>
<td>119.</td>
<td>Commitment to mitigate impacts on food security applies to all suppliers?</td>
<td>✗ 0 / 1</td>
<td>No source</td>
</tr>
<tr>
<td>120.</td>
<td>Progress on commitment to mitigate impacts on food security?</td>
<td>0.75 / 2</td>
<td></td>
</tr>
<tr>
<td>121.</td>
<td>Commitment to provide essential community services and facilities?</td>
<td>✓ 1 / 1</td>
<td></td>
</tr>
<tr>
<td>122.</td>
<td>Progress on commitment to provide essential community services and facilities?</td>
<td>✓ 1 / 1</td>
<td>0.78 / 1</td>
</tr>
<tr>
<td>123.</td>
<td>Commitment to respect all workers’ rights?</td>
<td>✓ 1 / 1</td>
<td></td>
</tr>
<tr>
<td>124.</td>
<td>Commitment to respect all workers’ rights applies to all suppliers?</td>
<td>✓ 1 / 1</td>
<td></td>
</tr>
</tbody>
</table>

The company makes this commitment through the RSPO Principles and Criteria 2018. Full points have therefore been awarded on the basis of the company's RSPO certified landbank (≥75%) and a further commitment to be 100% certified within five years.
Examples of the company implementing its commitment on workers rights are reported in external reports from Proforest, Finnwatch and BSR. However, note that all of these reports also identified issues with human rights-related practices in the estates they visited. Points for external verification have been awarded on the basis of the company’s RSPO certified landbank/volume.

**126. Commitment to Fundamental ILO Conventions or Free and Fair Labour Principles?**  
✓ 1 / 1

**127. Commitment to Fundamental ILO Conventions or Free and Fair Labour Principles applies to all suppliers?**  
✓ 1 / 1

**128. Commitment to eliminate gender-related discrimination with regards to employment and occupation?**  
✓ 1 / 1

**129. Commitment to eliminate gender-related discrimination with regards to employment and occupation applies to all suppliers?**  
✓ 1 / 1

**130. Percentage or number of temporary employees?**  
This indicator is disabled as the company has informed ZSL that it does not have any temporary employees

**131. Percentage or number of women employees?**  
7,400 (26.24%)

**132. Commitment to pay at least minimum wage?**  
The company states this in its Sustainable Palm Oil Policy. It also updated its policy on minimum wages and leave pay in January 2019. It states that minimum wage is paid to all employees, and clarifies that in Malaysia "the minimum wage for daily-rated workers working 6 days a week is RM42.31 per day"

**133. Commitment to pay at least minimum wage applies to all suppliers?**  
✓ 1 / 1

**134. Progress on commitment to pay minimum wage?**  
Reports from Proforest, BSR and Finnwatch all report minimum wage being paid on sites sampled in Malaysia. Points for external verification have been awarded on the basis of the company’s RSPO certified landbank/volume

**135. Reporting of salary by gender?**  
✗ 0 / 1 No source

**136. Commitment to address occupational health and safety?**  
✓ 1 / 1

**137. Commitment to address occupational health and safety applies to all suppliers?**  
✗ 0 / 1 No source

**138. Reduction of time lost due to work-based injuries?**  
In its 2018 sustainability report the company reports a lost days rate of 3.07 per million hours for its plantations. This is an
improvement on the reported figures in the 2017 sustainability report, which gave a lost days rate of 98.42 per million hours for its plantations. However, the 2018 report also gives a total of 4,431 lost days across its plantation, refinery and oleochemical operations. This is worse than in the 2017 report, which gave a total of 4,124 lost days across its plantation, refinery and oleochemical operations.

139. Time lost due to work-based injuries?
In its 2018 sustainability report the company reports a lost days rate of 3.07 per million hours for its plantations, and a total of 4,431 lost days across its plantation, refinery and oleochemical operations. It reports 1,698 injuries and 1.27 injuries per million hours for its plantation business. It also reports these figures for IOI Refinery and IOI Oleochemical operations. In total this gives 1,763 injuries.

140. Zero fatalities as a result of work-based accidents?
The company reports zero fatalities in its 2018 sustainability report.

141. Number of fatalities as a result of work-based accidents?
0 - The company reports zero fatalities in its 2018 sustainability report.

142. Provision of personal protective equipment and related training?
Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume, as well as a Proforest verification report.

143. Member of the Roundtable on Sustainable Palm Oil (RSPO)?
2,004 - Note that the company was suspended from the RSPO for five months in 2016.

144. RSPO-certified within three years of joining the RSPO or by November 2010 for companies joining prior to finalisation of the RSPO certification systems in November 2007?
2009

145. Submitted most recent RSPO Annual Communication of Progress (ACOP)?

146. Listed all countries and regions in which operates in most recent RSPO Annual Communication of Progress (ACOP)?
In the 2018 ACOP the company states it operates in West Kalimantan, Johor, Malacca, Negeri Sembilan, Pahang, Sabah, and Sarawak.

147. Time-bound plan for achieving 100% RSPO certification of estates and mills within five years or achieved 100% RSPO-certification of estates?
2023 - Note that this target was extended from 2013 to 2017, and then to 2018 and then to 2020, and then to 2023.
### 148. Percentage of area (ha) RSPO-certified?
173,446 (78.2%)

### 149. Percentage of scheme/plasma smallholders (ha) RSPO-certified?
The company reports 0 ha and 0 tonnes certified from scheme/plasma smallholders in its 2018 ACOP

### 150. Percentage of mills RSPO-certified?
14 (93.3%)

### 151. Time-bound plan for achieving 100% RSPO certification of scheme/plasma/associated smallholders and outgrowers within five years or target already achieved?
2023 - Note that this target was extended from 2017, then from 2020

### 152. Percentage of FFB supply (tonnes) from independent smallholders/outgrowers/third-party FFB suppliers that is RSPO-certified?
2,238.38 (9%) - In its 2018 ACOP the company reports a total of 24,796.16 tonnes from independent smallholders, outgrowers, and other third-party FFB suppliers. Of this, 2,238.38 tonnes from outgrowers is reported as certified.

### 153. Year expected to achieve 100% RSPO certification of all palm product processing facilities?
2013

### 154. Percentage of all palm oil and oil palm products handled/traded/processed (tonnes) that is RSPO-certified?
28.6% - The company has not reported volume data in its 2018 Processor/Trader ACOP. The 2017 ACOP reported a total of 556,430 tonnes certified, out of a total of 1,944,409 tonnes.

### 155. Sells or processes/trades RSPO-certified palm oil through Segregated or Identity Preserved supply chains?
The company has not reported volume data in its 2018 Processor/Trader ACOP. The 2017 ACOP reported the use of Book & Claim, Mass Balance, Segregated and Identity Preserved supply chains.

### 156. Indonesia Sustainable Palm Oil (ISPO) certified (100%)?
0 / 1 - No source

### 157. Malaysia Sustainable Palm Oil (MSPO) certified?
1 / 1 - Source

### 158. Certified under voluntary sustainability certification scheme (e.g. ISCC, SAS, RSB, etc.)?
The company reported in its 2018 sustainability report that 53% of its mills and refineries are ISCC certified, and several certificates are listed on the ISCC website. The company is also certified to the ISO 4001 standard. As of the Q3 sustainability update in 2018, the company had had Stage 2 audits for four mills for RSPO Next certification.
<table>
<thead>
<tr>
<th>159. Commitment to support smallholders?</th>
<th>✓</th>
<th>1 / 1</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>The company makes this commitment through the RSPO Principles and Criteria 2018. Full points have therefore been awarded on the basis of the company's RSPO certified landbank (≥75%) and a further commitment to be 100% certified within five years.</td>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>160. Programme to support scheme/plasma smallholders?</th>
<th>✓</th>
<th>1 / 1</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>The company makes reference to a “Fortuna Small Grower Socialisation Program” in its 2018 sustainability report, but this is now under the control of Bunge Loders Croklaan, not IOI Group. However, points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>161. Percentage of scheme/plasma smallholders involved in programme?</th>
<th>X</th>
<th>0 / 1</th>
<th>No source</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>162. Programme to support independent smallholders/outgrowers?</th>
<th>✓</th>
<th>1 / 1</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>The company states in its 2018 ACOP it supports independent smallholders in the following ways: “provides training, guideline and networks to technical expertise and certification body to enable them to proceed with the certification program”. Points for external verification have been awarded on the basis of the company’s RSPO certified landbank/volume.</td>
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<table>
<thead>
<tr>
<th>163. Percentage of independent smallholders/outgrowers involved in programme?</th>
<th>X</th>
<th>0 / 1</th>
<th>No source</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>164. Process used to prioritise, assess and/or engage suppliers on compliance with company's policy and/or legal requirements?</th>
<th>✓</th>
<th>1 / 1</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>The company states that it risk-assesses all palm oil supplier mills using tools such as spatial data and remote sensing information in order to facilitate monitoring of the palm oil supply chain to establish priorities for conducting mill-level verification assessments.</td>
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</table>

<table>
<thead>
<tr>
<th>165. Percentage of suppliers assessed and/or engaged on compliance with company requirements?</th>
<th>0.5 / 1</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>4% - The company stated in its 2017 sustainability report that 21 mill verification assessments were completed during the reporting period, representing 1.5% of suppliers. The website dashboard, as of the June 2019 update, seems to report 36 mills with completed risk assessments, and a further seven underway, out of a total of 909 mills, suggesting 4.0% with completed assessments. On the same dashboard page, however, the company reports 15 direct mills and 405 indirect mills, giving a total of 420 mills. These unclear figures for total number of mills mean it is hard to calculate the percentage of suppliers the 36 mills account for.</td>
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</table>

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<thead>
<tr>
<th>166. Time-bound plan to engage with all high-risk mills within three years?</th>
<th>0.5 / 1</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>The company's Sustainable Palm Oil Policy states that it will ensure engagement with all direct and indirect mills, but does not state a three-year time-bound plan for doing so.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>167. Programme to support high-risk mills to become compliant with sourcing policies?</th>
<th>✓</th>
<th>1 / 1</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>The company reported in its 2017 sustainability report that it conducts “compliance workshops” with mills. It has implemented a mill-level programme for third-party suppliers which supports them to adhere to the company's policy. The company states it is also using Earthworm Foundation’s Tools for Transformation (“T4T”) digital platform to underpin engagement with its third-party suppliers in Malaysia. Note that the recent Proforest verification reports state that some workshops on compliance were conducted September 2015 - April 2018, but they also state that there “are no current programmes to ensure policy implementation in the indirect supply base”.</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>168. Regularly engages with a subset of high-risk mills?</th>
<th>0.75 / 1</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>[Externally verified] The company engages with its high-risk suppliers but it is unclear how often this is carried out.</td>
<td></td>
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</tr>
</tbody>
</table>
169. Procedures in place to assess all own and third-party supplying palm oil mills for risk level?
The company explains details of its procedure for assessing both direct and indirect mills in its supply chain in its 2017 sustainability report, which includes satellite data monitoring with external party Satelligence. In its 2018 sustainability report it states mills are assessed every two years. In its 2019 Q1 sustainability progress update, the company states that it has entered into an agreement with Aidenvironment to assess the risk of its suppliers. Note, however, that the recent Proforest verification reports state this risk assessment work is not necessarily being carried out as reported.

170. Regularly assesses and categorises the risk level of all own and third-party supplying mills?
The company reports in its 2018 sustainability report that mills are assessed every two years, and that it assesses a minimum of 10 new mills a year with an assessment partner. Note, however, that the recent Proforest verification reports state this risk assessment work is not necessarily being carried out as reported.

171. Regularly reports the risk level of all own and third-party supplying mills identified in its supply chain?

172. Suspension or exclusion criteria for suppliers?
The company states for both direct and indirect supplier mills, that it requires compliance within 12 months and “Where groups are suspected of serious or ongoing environmental, social and labour violations, IOI Group shall consider suspending purchases from the group until investigations are concluded and any policy violations resolved”

173. Time-bound action plans (including Key Performance Indicators) for suppliers to be in compliance with palm oil sourcing commitments?

174. Proportion of direct and indirect supply that comes from palm oil plantations which are compliant with palm oil sourcing policies?

175. Commitment to ethical conduct and prohibition of corruption?

176. Commitment to ethical conduct and prohibition of corruption applies to all suppliers?

177. Progress on commitment to ethical conduct and prohibition of corruption?
The company reports that it “communicates the Code of Business Conduct and Ethics to its employees upon their employment”, but no examples could be found of how the company is communicating its Business Ethics, Compliance, Anti-corruption and Anti-money Laundering Policy. However, points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.

178. Disclosure of the company's management approach to tax and payments to governments?

179. Whistleblowing procedure?
<p>| | | |</p>
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<tr>
<th></th>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>180. Own grievance or complaints system open to all stakeholders?</td>
<td>✓</td>
<td>1/1 Source</td>
</tr>
<tr>
<td>181. Details of complaints and grievances disclosed?</td>
<td>✓</td>
<td>1/1 Source</td>
</tr>
</tbody>
</table>