

**MALAYSIAN SUSTAINABLE PALM OIL
2nd ANNUAL SURVEILLANCE ASSESSMENT
Public Summary Report**

Kulim (Malaysia) Berhad
Client company Address: 705, Ulu Tiram Estate, 81900 Ulu Tiram, Johor Bahru, Malaysia
Certification Unit: Pasir Panjang Palm Oil Mill & Plantations of Pasir Panjang Complex (Pasir Panjang Estate, Tunjuk Laut Estate, Bukit Payung Estate, Siang Estate, Bukit Kelompok Estate & Pasir Logok Estate)
Location of Certification Unit: PTD 558, HSD 35107, Mukim Kambau, Daerah Kota Tinggi, Johor, Malaysia

Report prepared by:
Hu Ning Shing (Lead Auditor)

Report Number: 3091785

Assessment Conducted by:
BSI Services Malaysia,
(DSM Accreditation Number: MSPO 09112018 CB 12)
Suite 29.01 Level 29 The Gardens North Tower,
Mid Valley City Lingkaran Syed Putra,
59200 Kuala Lumpur
Tel +60392129638 Fax +60392129639
www.bsigroup.com

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Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
Company Name	Kulim (Malaysia) Berhad Pasir Panjang Palm Oil Mill		
Mill/Estate	MPOB License No.	Expiry Date	
	Pasir Panjang Palm Oil Mill - 592302004000	31/12/2021	
	Pasir Panjang Estate - 578736002000	31/03/2021	
	Tunjuk Laut Estate - 501477102000	31/03/2021	
	Bukit Payung Estate - 501479702000	31/03/2021	
	Siang Estate - 575783002000	31/08/2021	
	Bukit Kelompok Estate - 502303602000	31/01/2021	
	Pasir Logok Estate - 502308702000	29/02/2021	
Address	PTD 558, HSD 35107, Mukim Kambau, Daerah Kota Tinggi, Johor, Malaysia		
Certification Unit	Pasir Panjang Palm Oil Mill and estates.		
Contact Person Name	Mdm. Salasah Elias (Deputy General Manager)		
Website	www.kulim.com.my	E-mail	salasah@kulim.com.my
Telephone	07-8611611	Facsimile	07-8631084

1.2 Certification Information			
Certificate Number	Mill: MSPO 696199 Plantations: MSPO 696200		
Issue Date	08/03/2019	Expiry date	07/03/2024
Scope of Certification	Mill: Production of Sustainable Palm Oil and Palm Oil Products Estate: Production of Sustainable Oil Palm Fruits		
Standard	MS 2530-3:2013 Part 3 and MS 2530-4:2013 Part 4		
Stage 1 Date	N/A (The certification unit is RSPO certified)		
Stage 2 / Initial Assessment Visit Date (IAV)	03 - 06/12/2018		
Continuous Assessment Visit Date (CAV) 1	11 - 14/11/2019		
Continuous Assessment Visit Date (CAV) 2	07 - 10/12/2020		
Continuous Assessment Visit Date (CAV) 3	N/A		
Continuous Assessment Visit Date (CAV) 4	N/A		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date

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EU-ISCC-Cert-DE119-60206096	ISCC EU	ASG CERT GmBH	18/03/2021
A108289	MS 1500: 2009	JAKIM	31/01/2021
RSPO 657192	RSPO Principles & Criteria for Sustainable Palm Oil Production: 2013; Malaysian National Interpretation: 2014; RSPO Supply Chain Certification June 2017 for CPO Mills (Module D: Identity Preserved)	BSI Services Malaysia Sdn Bhd	08/03/2021
BVC_MSPO/SC_0030	MSPO SCCS	BUREAU VERITAS	10/03/2025

1.3 Location of Certification Unit

Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Longitude	Latitude
Pasir Panjang POM	PTD 558, HSD 35107, Mukim Kambau, Daerah Kota Tinggi, Johor, Malaysia	103.94858	2.01801
Pasir Panjang Estate	PTD 558, HSD 35107, Mukim Kambau, Daerah Kota Tinggi, Johor, Malaysia	103.95442	2.00966
Tunjuk Laut Estate	PTD 36, HSD 7747, Mukim Kambau, Daerah Kota Tinggi, Johor, Malaysia	103.98598	1.96158
Bukit Payung Estate	PTD 4143, HSD 35105, Mukim Kambau, Daerah Kota Tinggi, Johor, Malaysia	103.92016	2.00738
Siang Estate	PTD 105763, HSD 354243, Mukim Kambau, Daerah Kota Tinggi, Johor, Malaysia	104.21118	1.65282
Bukit Kelompok Estate	PTD 401, HSD 32182, Mukim Kambau, Daerah Kota Tinggi, Johor, Malaysia	103.99844	2.00675
Pasir Logok Estate	PTD 402, HSD 32183, Mukim Kambau, Daerah Kota Tinggi, Johor, Malaysia	104.03899	2.03149

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1.4 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Pasir Panjang Estate	1,447.84	130.91	127.25	1,706.00	84.87
Tunjuk Laut Estate	2,648.79	29.23	189.78	2,867.80	92.36
Bukit Payung Estate	1,924.24	293.65	89.74	2,307.63	83.39
Siang Estate	3,204.69	71.11	167.30	3,443.10	93.08
Bukit Kelompok Estate	2,437.75	41.19	134.86	2,613.80	93.26
Pasir Logok Estate	1,998.06	17.40	82.27	2,097.73	95.25
TOTAL	13,661.37	583.49	791.20	15,036.06	90.86

Note:

- i) Pasir Panjang Estate = Resurvey and new effluent pond (Planted Area) & 18.09 previous not declare as HCV
- ii) Bukit Payung Estate = Resurvey
- iii) Pasir Logok Estate = Resurvey

1.5 Plantings & Cycle							
Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Pasir Panjang Estate	542.94	904.90	0	0	0	904.90	542.94
Tunjuk Laut Estate	0	1,715.48	933.31	0	0	2,648.79	0
Bukit Payung Estate	710.67	1,213.57	0	0	0	1,213.57	710.67
Siang Estate	0	889.79	2,314.90	0	0	3,204.69	0
Bukit Kelompok Estate	0	1,132.23	1,281.72	23.8	0	2,437.75	0
Pasir Logok Estate	146.29	509.78	1,341.99	0	0	1,851.77	146.29
Total (ha)	1,399.9	6,365.75	5,871.92	23.8	0	12,261.47	1,399.9

1.6 Certified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Dec 19 - Nov 20)	Actual (Nov 2019 - Nov 20)	Forecast (Dec 20 - Nov 21)
Pasir Panjang Estate	19,130.00	19,571.10	24,244.00
Tunjuk Laut Estate	51,222.00	58,357.74	57,654.00
Bukit Payung Estate	20,880.00	21,496.34	25,091.00

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Siang Estate	82,480.00	79,995.03	80,057.00
Bukit Kelompok Estate	56,355.00	62,132.44	59,960.00
Pasir Logok Estate	49,416.00	59,405.26	48,690.00
Ladang Basir Ismail	0	2,700.72	0
Ladang Ulu Tiram	0	501.99	0
Total	279,483.00	304,160.62	295,696.00

Note:

Nov 2019 = 22,753.17 MT

Dec 2019 – Nov 2020 = 281,407.45 MT

1.7 Uncertified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Dec 19 - Nov 20)	Actual (Nov 2019 - Nov 20)	Forecast (Dec 20 - Nov 21)
N/A			

1.8 Certified Tonnage

Mill Capacity: 45 MT/hr	Estimated (Dec 19 - Nov 20)	Actual (Nov 2019 - Nov 20)	Forecast (Dec 20 - Nov 21)
	FFB	FFB	FFB
	279,483.00	304,160.62	295,696.00
SCC Model: SG	CPO (OER: 22.54%)	CPO (OER: 22.27%)	CPO (OER: 22.60%)
	63,003.00	67,740.39	66,827.00
	PK (KER: 5.21%)	PK (KER: 5.40%)	PK (KER: 5.30%)
	14,557.00	16,426.18	15,672.00

Note:

CPO:

Nov 2019 = 5,016.92 MT

Dec 2019 – Nov 2020 = 62,723.47 MT

PK:

Nov 2019 = 1,230.25 MT

Dec 2019 – Nov 2020 = 15,195.93 MT

1.9 Actual Sold Volume (CPO)

CPO (MT)	MSP0 Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
68,442.49	0	2,628.09	36,046.40	29,286.91	67,961.40

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Remark:
Opening stock on November 2019:
CPO: 702.10 MT

1.10 Actual Sold Volume (PK)

PK (MT)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
16,550.33	0	0	14,836.93	1,641.44	16,478.37

Remark:
Opening stock on November 2019:
PK: 124.15 MT

Section 2: Assessment Process

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 190 countries. BSI Standards is the UK’s National Standards Body. BSI provides independent, third-party certification of management systems.

Assessment Methodology, Programme, Site Visits

This remote assessment was conducted from 07 – 10/12/2020. The audit programme is included as Section 2.3. The approach to the audit was to treat the Pasir Panjang Palm Oil Mill and Estates as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included review of documentation and monitoring data. MS 2530-3:2013 and MS 2530-4:2013 were used to guide the collection of information to assess compliance. There was no interview and site visit carried out due to 100% remote audit caused by Covid-19 pandemic.

The estates or smallholders sample were determined based on formula $S = r\sqrt{n}$ where n is the number of estates while when applicable, the smallholders sample were determined following the MSPO Certification Requirement. The sampling of smallholders were based on the formula $(r\sqrt{n})$; where r is the risk factor (may defers 1, 1.5 and 2 depending on risk), where n is total number of group members. The sampled smallholder listed in Appendix C.

All the previous nonconformities are remains closed. The assessment findings for the annual surveillance assessment are detailed in Section 4.2.

This report is structured to provide a summary of assessment finding as attached in the Section 3. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

This report was externally reviewed by MSPO approved Peer Reviewer prior to certification decision by BSI.

The following table would be used to identify the locations to be audited each year in the 5 years cycle:

Assessment Program					
Name (Mill / Plantation / Group smallholders)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Pasir Panjang POM	√	√	√	√	√
Pasir Panjang Estate	√	-	√	-	√
Tunjuk Laut Estate	√	-	√	-	√
Bukit Payung Estate	√	-	√	-	√
Siang Estate	-	√	-	√	-
Bukit Kelompok Estate	-	√	-	√	-
Pasir Logok Estate	-	√	-	√	-

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Tentative Date of Next Visit: August 30, 2021 - September 2, 2021

Total No. of Mandays: 8

2.1 BSI Assessment Team

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Hu Ning Shing	Team Leader	She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in her previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She attended Endorsed MSPO Auditor and MSPO SCCS Lead Auditor Course in 2019. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she assessed on the aspects of social, legal, workers & stakeholders consultation and SCC for CPO mill. She is fluent in Bahasa Malaysia and English languages.
Muhamad Naquiddin	Team Member	He graduated with Bachelor of Science Horticulture at University Putra Malaysia. He started his career in 2009 as Researcher at Sime Darby Research Seed Centre and manage for Quality control for seed production for paddy, chilli and corn with collaboration with Malaysian Agricultural Research and Development Institute (MARDI) for 4 years. During the period, he was also involved with Nestle project on Red Rice production. He later joins the Sime Darby Plantation Berhad Sustainability Team in 2013 as Sustainability Executive. Joining the sustainability team, he managed, implemented and monitored the RSPO, ISCC, MSPO and ISO 9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training and internal audits related to RSPO, MSPO and other certifications where applicable to the operations within Sime Darby Plantation. He is a trained Safety Officer and he managed the Occupation Safety and Health of Northern Region Sime Darby Plantation Berhad operations. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health and workers consultation.

2.2 Accompanying Persons

No.	Name	Role
N/A		

2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment (attached assessment plan).

Date	Time	Subjects	HNS	MNM	ICT Planned
Monday 07/12/2020 Pasir Panjang Estate	0900 - 0915	Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan 	√	√	Teleconference, Microsoft Team Meeting, Email
	0915 - 1030	Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement	-	√	Teleconference, Microsoft Team Meeting, Email
	1030 – 1040	10 minutes break	-	√	
	1040 – 1230	Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement	-	√	Teleconference, Microsoft Team Meeting, Email
	1230 - 1330	Lunch break	√	√	
	1330 - 1450	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√	-	Teleconference, Microsoft Team Meeting, Email
	1450 – 1500	10 minutes break	√	-	
	1500 - 1700	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√	-	Teleconference, Microsoft Team Meeting, Email
	1700 – 1730	Interim Closing Briefing	√	√	Teleconference, Microsoft Team Meeting, Email
Tuesday 08/12/2020 Pasir Panjang Palm Oil Mill	0900 - 1030	Assessment and documentation review on mill best practice, legal requirements, OHS, environment and continual improvement	-	√	Teleconference, Microsoft Team Meeting, Email
	1030 - 1040	10 minutes break	-	√	
	1040 – 1230	Assessment and documentation review on mill best practice, legal requirements, OHS, environment and continual improvement	-	√	Teleconference, Microsoft Team Meeting, Email
	1230 - 1330	Lunch break	√	√	
	1330 - 1450	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√	-	Teleconference, Microsoft Team Meeting, Email
	1450 – 1500	10 minutes break	√	-	
	1500 - 1700	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√	-	Teleconference, Microsoft Team Meeting, Email
	1700 – 1730	Interim Closing Briefing	√	√	Teleconference, Microsoft Team Meeting, Email
Wednesday 09/12/2020 Tunjuk Laut	0900 - 1030	Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement	-	√	Teleconference, Microsoft Team Meeting, Email

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Date	Time	Subjects	HNS	MNM	ICT Planned
Estate	1030 - 1040	10 minutes break	-	√	
	1040 – 1230	Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement	-	√	Teleconference, Microsoft Team Meeting, Email
	1230 - 1330	Lunch break	√	√	
	1330 - 1450	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√	-	Teleconference, Microsoft Team Meeting, Email
	1450 – 1500	10 minutes break	√	-	
	1500 - 1700	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√	-	Teleconference, Microsoft Team Meeting, Email
	1700 – 1730	Interim Closing Briefing	√	√	Teleconference, Microsoft Team Meeting, Email
Thursday 10/12/2020	0900 - 1030	Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement	-	√	Teleconference, Microsoft Team Meeting, Email
Bukit Payung Estate	1030 - 1040	10 minutes break	-	√	
	1040 – 1230	Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement	-	√	Teleconference, Microsoft Team Meeting, Email
	1230 - 1330	Lunch break	√	√	
	1330 - 1450	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√	-	Teleconference, Microsoft Team Meeting, Email
	1450 – 1500	10 minutes break	√	-	
	1500 - 1700	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management	√	-	Teleconference, Microsoft Team Meeting, Email
	1600 - 1630	Preparation of Closing Meeting	√	√	Teleconference, Microsoft Team Meeting, Email
	1630 – 1700	Closing Meeting	√	√	Teleconference, Microsoft Team Meeting, Email

Section 3: Assessment Findings

3.1 Details of audit results

This assessment has been assessed using the following MSP0 normative requirements. The assessment details are provided in Appendix A.

- MSP0 MS 2530-2:2013 – General Principles for Independent Smallholders
- MSP0 MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders
- MSP0 MS 2530-4:2013 – General Principles for Palm Oil Mills

3.2 Details of Nonconformities and Opportunity for improvement

The nonconformity is listed below.

During the Certification Assessment there was none non-conformity raised.

Major Nonconformities:		
Ref: N/A	Area/Process: Pasir Panjang Palm Oil Mill	Clause: N/A
	Issue Date: N/A	Due Date: N/A
Requirements:	N/A	
Statement of Nonconformity:	N/A	
Objective Evidence:	N/A	
Corrections:	N/A	
Root cause analysis:	N/A	
Corrective Actions:	N/A	
Assessment Conclusion:	N/A	

3.3 Status of Nonconformities Previously Identified and OFI

Major Nonconformities:		
Ref: 1844763-201910-M1	Area/Process: Pasir Panjang Palm Oil Mill and Supply Bases	Clause: 4.3.1.1 Part 3
Requirements:	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.	
Statement of Nonconformity:	Implementation of compliance with the legal requirements are not effective.	
Objective Evidence:	Siang Estate:	

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	<p>Document reviewed on the permits for contractor’s workers (Vetri Vinot Enterprise) found that one of the permit was expired on 17/10/2019. Seen the submission of the renewal passport on 14/10/2019. (Passport No.: AT 531719)</p> <p>Besides, there are total 7 contractor’s workers employed by contractor LKG that worked in Siang Estate are under another company, Blossom Nurseries as shown in the permit that employed as Garden Worker in sector Agricultural. This is not accordance to the Immigration Act.</p> <p>Pasir Logok Estate: There were total 90 units of houses in Pasir Logok Estate. Linesite inspection was carried out on weekly basis by Hospital Assistant. However, the inspection was not covered for all the houses in weekly basis where the Hospital Assistant informed that he sampled half of the houses to be inspected and rotate for the other half at following week. Besides, there was a contractor’s workshop in the Block B housing area. Site visit to the workshop found the following issues: i. Oil spillage on the soil ground. ii. Five lorries were parking on the soil ground but not the designate parking bay.</p> <p>Bukit Kelompok Estate: One of the contractor that carry out harvesting work in field P11 – P13 found that the sampled 6 workers with permit that employed as Garden Worker in sector Agricultural. This has confirmed with the Officer of Immigration Department Johor through phone interview that this is not allowed.</p>
<p>Corrections:</p>	<p>i) Estate had assisted the respective contractor to follow up with MyEG to enquire on the renewal approval status of these workers. Contractor has visited the MyEG office to clear the status of the workers and the renewal permit was obtained on 18/11/2019. ii) Estate management had conducted a briefing on 14 Nov. 2019 to the contractors with respect to understanding and compliance on the JTK and Immigration Act as per contract agreed by the contractor and the company. Reminder letter issued to the contractor for the issue. Reminder letter has been given on 14/11/2019. iii) Briefing to HA on 22/11/2019 on worker’s minimum standard of housing and amenities Act 1990. Immediate to cover all houses weekly during linesite inspection. iv) Training on spill kit and parking procedure for driver lorries has been conducted on 20/11/2019.</p>
<p>Root cause analysis:</p>	<p>i) The work permit were submitted for permit renewal process by the contractor. The main cause of pending submission until three days before expiry date, is due to late processing of FOMEMA report by panel clinic coupled with validity of passport belong to Saipul Bahri is less than 13 month which require him to replace with new passport for purpose of renewal. ii) Monitoring on the contractor’ documents and the contractor’ workers was not properly conducted thus, thus the shortcoming cannot be detected earlier. iii) The respective HA had a wrong understanding of the requirements, and at the same time estate management failed in monitoring the work of their HA wrt respective task. iv) Estate does not conduct training for the drivers on how manage oil spillage on the soil ground and insufficient parking lot at designated area.</p>
<p>Corrective Actions:</p>	<p>i) EOD to include monitoring of all contractor workers passports and PLKS Renewal process in the Job Description of the relevant personnel. ii) EOD to include monitoring of all contractor workers passports and PLKS Renewal</p>

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	<p>process in the Job Description of the relevant personnel.</p> <p>iii) SQD will revised Work Instruction for linesite to include on verification of linesite inspection by Assistant Manager and Manager.</p> <p>iv) SQD to strengthen the Workshop guideline and Control monitoring Work instruction.</p>
<p>Assessment Conclusion:</p>	<p>Verified on the evidence submitted as below:</p> <p>i) The valid permit was issued on 18/11/2019 and received the valid permit with the Permit No.: PE 9300321 valid until 17/10/2020. A Foreign Workers Checklist for Contractors was developed to monitor the validity of the permit of contractor’s workers. The checklist was developed on 31/12/2019 by the typist of Siang Estate. Besides, the Job Description of the Executives and Non-Executives have been revised to include the job scope of “person in charge on Foreign Workers Affairs and Permits (PLKS)/ Passport Documentation of Checkroll and Contract Workers”. Seen the job description of Assistant Manager and General Clerk dated 1/1/2020.</p> <p>ii) A training on “Understanding and Compliance of Immigration and Employment Act” was conducted on 14/11/2019 for the contractor. Seen the training evaluation record and the HOD recommended the training to be conducted minimum 2 times per year for the contractor in order to ensure compliance of legal requirements. A reminder letter dated 14/11/2019 issued by Senior Manager of Siang Estate was given to the contractor to ensure the contractor does not employ any workers using other companies’ quota. The contractor has acknowledged on the received of the reminder letter on 14/11/2019. Besides, the Job Description of the Executives and Non-Executives have been revised to include the job scope of “person in charge on Foreign Workers Affairs and Permits (PLKS)/ Passport Documentation of Checkroll and Contract Workers”. Seen the job description of Assistant Manager and General Clerk dated 1/1/2020.</p> <p>iii) The Assistant Manager has given training to the Hospital Assistant on Workers’ Minimum Standard of Housing and Amenities Act 1990 on 22/11/2019. Seen the photo evident and training attendance record. Besides, a memo dated 22/11/2019 issued by the Manager of Pasir Logok to the Hospital Assistant to remind the Hospital Assistant to carry out the linesite inspection as per the regulation. In addition, a Work Instruction – Linesite with Doc. No.: SPO/WI/10, Rev. No.: 01 dated 1/1/2020 was developed to include the linesite inspection record to be verified by Assistant Manager or Manager on weekly basis.</p> <p>iv) Training on spillage management and parking procedure was conducted on 20/11/2019 to the lorry drivers. Seen the training attendance and photo evident. Besides, Work Instruction of Workshop with Doc. No.: SPO/WI/08, Rev. No.: 01 dated 1/1/2020 was developed. Designated parking for vehicles with drip tray is required as the SOP.</p> <p>Thus, the evidence submitted is sufficient and thus the major non-conformance was closed on 12/1/2020.</p> <p>The implementation of the corrective actions will be verified during next assessment. Verification ASA2, Reviewed the workers' permits for contractor in sampled estate, Pasir Panjang Estate, Tunjuk Laut Estate and Bukit Payung Estate found that all the workers' permits are still valid.</p>

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	<p>Linesite inspection was carried on weekly basis by Hospital Assistant in sampled estates where the checklist of the linesite inspection was reviewed. Assistant Manager and Manager will counter-verify after the inspection was done.</p> <p>Thus, the major NC remain closed.</p>
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Major Nonconformities:		
Ref:	Area/Process: Pasir Panjang Palm Oil Mill and Supply Bases	Clause: 4.4.5.8 Part 4
Requirements:	The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.	
Statement of Nonconformity:	The working hours has exceeded the maximum 12 hours per day as per in the Employment Act 1955.	
Objective Evidence:	<p>Pasir Panjang POM: Sampled of the workers below found that they worked more than 12 hours a day. This has confirmed with the JTK Johor Officer through phone interview that the workers are not allowed to work more than 12 hours a day.</p> <ul style="list-style-type: none"> i. Employee No.: 640055 ii. Employee No.: 640086 iii. Employee No.: 640152 iv. Employee No.: 640169 	
Corrections:	Mill has applied for overtime work permits through the Department of Labor (JTK) on 18/11/2019 and will follow up on the status of the application. Human Capital Management Division (HCMD) has conducted Employment Act 1955 training on 25/11/2019. The training was delivered by Pn Azleen Abd Rahman, Assistant Director of JTK Johor.	
Root cause analysis:	Mill only does monitoring on monthly overtime to be not over than 104 hours instead of daily monitoring which should not more than 4 hours overtime after 8 hours of normal working hours.	
Corrective Actions:	<ul style="list-style-type: none"> i) SQD will develop template of overtime daily monitoring. ii) Mill will monitor daily overtime records. 	
Assessment Conclusion:	<p>Verified on the evidence submitted as below: Seen the letter of application for overtime exceeded 104 hours to JTK on 10/12/2019. A training on Employment Act 1955 was conducted on 25/11/2019 by HCDM to all the relevant employees. Seen the photo evident of the training conducted. A monitoring of overtime was conducted on daily basis by using the Checkroll for the month for each of the workers. Seen the monitoring on December 2019.</p> <p>Thus, the evidence submitted is sufficient and thus the major non-conformance was closed on 12/1/2020.</p> <p>The implementation of the corrective actions will be verified during next assessment.</p> <p>Verification ASA2, Reviewed the payslips of the workers found that they did not exceed the overtime limit to 104 hours. The management has monitored and recorded the rest time of the workers in the Break Time record. In the meantime, the management has attended interview with JTK on 04/11/2020 related to the application of overtime limits and</p>	

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	waiting for approval. Thus, the major NC remain closed.
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Minor Nonconformities:		
Ref: 1844763-201910-N1	Area/Process: Pasir Panjang Palm Oil Mill and Supply Bases	Clause: 4.4.1.1 Part 3
Requirements:	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones.	
Statement of Nonconformity:	SIA was not conducted and no management plan developed for the impacts below.	
Objective Evidence:	The impact of delay in renewal of work permit due to late process of MyEG and Immigration Department is not identified during SIA assessment and therefore, mitigation plan was not available for the impact.	
Corrections:	EOD is to liaise and advise SQD should there' any expected change of practices and/or requirements that warrant social impacts (negative or positive) to OUs & its workers through Social Impact Assessment to Internal Stakeholder (Management).	
Root cause analysis:	The renewal delay for Foreign Workers renewal process was initially in order and was not included in Pasir Panjang SIA assessment.	
Corrective Actions:	EOD is to liaise and advise SQD should there' any expected change of practices and/or requirements that warrant social impacts (negative or positive) to OUs & its workers through Social Impact Assessment to Internal Stakeholder (Management).	
Assessment Conclusion:	Verification ASA2, Reviewed the SIA management found that the Sustainability Team has assessed the impact on the delay in renewal of work permit and identified the action taken. The management has decided to submit for renewal at least 3 months prior the expiry of the permit to MyEG. Thus, the implementation of corrective action plan was found effective and the minor NC was closed on 10/12/2020.	

Minor Nonconformities:		
Ref: 1844763-201910-N2	Area/Process: Pasir Panjang Palm Oil Mill and Supply Bases	Clause: 4.4.5.4 Part 3
Requirements:	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.	
Statement of Nonconformity:	The contractor's workers have yet to pay according to the legal requirement for work on rest day.	
Objective Evidence:	Siang Estate: Document reviewed on the payslip found that no work on rest day by the contractors' workers. However, reviewed on the Internal Crop Book from July 2019 to October 2019 found that there were crops harvested and delivered for weighing on the rest day. This shown that the contractors' workers did not pay double for the rest day work. Sampled 10 out of 30 workers from two contractors. Bukit Kelompok Estate: Document reviewed on the Crop Book found that the contractor's worker (Lorry Driver - Passport No.: B 4115037) worked on rest day on 21/9/2019, 28/9/2019,	

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	12/10/2019 and 26/10/2019. Reviewed on the payslips could not show that the worker was paid as per the Employment Act 1955 for work on rest day.
Corrections:	The contractor had paid the wages of the workers who worked on rest day but did not get double pay. Estate has brief the contractor that they need to offer work during rest day if needed and monitor their workers activity during rest day to avoid any voluntarily work. The Contractor shall communicate the information to their workers, acknowledged by all workers and record to be kept in file.
Root cause analysis:	i) Estate pay the contractor based on the productivity tonnage so the contractor use the same approach to pay the workers tonnage even though they work on the rest day. Workers (Harvester) voluntarily work on Saturday to increase their productivity tonnage for extra earning. ii) Estate pay the contractor based on the productivity tonnage. Contractor workers being paid based on the productivity tonnage also. Contractor workers being paid based on the productivity tonnage even though they work on the rest day. Estate pay the contractor based on the productivity tonnage so the contractor use the same concept to pay the workers. Workers (Harvester) voluntarily work on Saturday to increase their productivity tonnage for extra earning.
Corrective Actions:	A briefing is to be conducted by estate to their contractors with respect to understanding on the legal or industry minimum standards for their employees' as per employment contract agreed between the contractor and his employee. Scheduled to be conducted during the 4th week of November 2019. Monthly monitoring on contract workers wages will be done through the contractor workers' pay-slip and the Monthly FW Checklist. Contractor shall seek for estate approval and advised if there's any need for work on rest day. Monitoring also through the approval of working on rest day.
Assessment Conclusion:	Verification ASA2, Briefing to all contractors in Kulim (M) Berhad was carried out on 15/10/2020 to explain all the labour's issues and rights. Seen the training attendance and training materials. Bukit Kelompok Estate's management has carried out briefing to the contractor and contractors' workers related to the employment contract, payslip and the payment of wages on 09-10/11/2020 and seen the record of attendance of the briefing. Besides, a list of contractors' workers was maintained in both estates to ensure the contractor's workers are paid accordingly. When there was a need of work on rest day, a request email will be sent to the management for approval. Seen the email request dated 05/11/2020 and approved by the Bukit Kelompok Estate's management. Thus, the implementation of corrective action plan was found effective and the minor NC was closed on 10/12/2020.



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CAR Ref.	CLASS	ISSUED	STATUS
1716200-201806-M1	Major	06/12/2018	Closed on 12/01/2019
1844763-201910-M1	Major	10/10/2019	Closed on 12/01/2020
1844763-201910-M2	Major	10/10/2019	Closed on 12/01/2020
1844763-201910-N1	Minor	10/10/2019	Closed on 10/12/2020
1844763-201910-N2	Minor	10/10/2019	Closed on 10/12/2020

3.5 Issues Raised by Stakeholders

No interview was carried out due to 100% remote audit caused by Covid-19 pandemic.

Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings	
Based on the findings during the remote assessment Pasir Panjang Palm Oil Mill and Estates Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of Pasir Panjang Palm Oil Mill and Estates Certification Unit is approved and/or continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: Salasah Elias	Name: Hu Ning Shing
Company name: Kulim (Malaysia) Berhad	Company name: BSI Services Malaysia Sdn Bhd
Title: Deputy General Manger	Title: Lead Auditor
Signature: 	Signature: 
Date: 24/12/2020	Date: 17/12/2020

Appendix A: Summary of the findings by Principles and Criteria

MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Plantations and Organized Smallholders

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	A policy for the implementation of MSPO shall be established. - Major compliance -	Kulim (Malaysia) Berhad has established Malaysian Sustainable Palm Oil Policy dated 1/05/2018 for Bahasa Malaysia and 30/11/2019 for English version signed by Executive Director. The company is committed to implement all Principles and Criteria set out by the MSPO.	Yes
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	The company is committed to implement all Principles and Criteria of MSPO. KULIM will make every effort to achieve the balance between people, planet and profit in all management decisions and operations through continual program. The policy has been communicated to the workers on 04/12/2020 in Pasir Panjang Estate, 17/01/2020 in Tunjuk Laut Estate, 05/10/2020 in Bukit Payung Estate and relevant stakeholders during the stakeholder meeting conducted on 07/10/2020.	Yes
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.	An integrated internal audit for RSPO/ MSPO/ ISCC was planned to carry out on 06/09/2020 – 02/10/2020 for all estates in Kulim (M) Berhad by Sustainability team. The audit schedule for Pasir Panjang	Yes

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	Estate and Bukit Payung Estate was on 14/09/2020 and 05/10/2020 for Tunjuk Laut Estate. Seen the RSPO, ISCC & MSPO List of Documentation Audit where it has covered all the principles and criteria of MSPO. There was one non-conformance raised or MSPO in Pasir Panjang Estate, one non-conformance raised in Tunjuk Laut Estate and one non-conformance raised in Bukit Payung Estate.	
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	KULIM (Malaysia) Berhad has developed Internal Audit Procedure with Doc. No.: SQD/SMS/3.2 dated 01/08/2020. The aim of the procedure is to ensure that the implementation of the company's RSPO, ISCC and MSPO management system is in line with the defined policies, procedures and other requirements. The frequency of the audit to be carried out is at least once within 12 months (before expiry of the certificate). The result of internal audit was recorded in the Non-Conformance Report (NCR) form. There was one non-conformance raised or MSPO in Pasir Panjang Estate, one non-conformance raised in Tunjuk Laut Estate and one non-conformance raised in Bukit Payung Estate. Corrective Action Plan dated 05/10/2020 in Pasir Panjang Estate, 08/10/2020 in Tunjuk Laut Estate and 17/09/2020 in Bukit Payung Estate was developed with root cause identified, immediate action and preventive action.	Yes
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	The Non-Conformance Report and RSPO, ISCC & MSPO List of Documentation Audit was distributed to the estate after the audit was completed and the Estate Manager has acknowledged on the report.	Yes

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.1.3 – Management Review			
4.1.3.1	<p>The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.</p> <p>- Major compliance -</p>	<p>Pasir Panjang Estate’s management has carried out Management Review Meeting for MSPO/ RSPO on 20/10/2020. Seen the meeting minutes with the following agendas discussed during the meeting:</p> <ul style="list-style-type: none"> i. Follow up actions from management review ii. Process performance and product conformity iii. Customer Feedback iv. Changes that could affect management system v. Audit Result vi. Status of Corrective and Preventive Action vii. Recommendation for improvement viii. Complaints and Grievances ix. Other Matters <p>Management Review Meeting in Tunjuk Laut Estate was conducted on 08/10/2020 with total 17 participants and in Bukit Payung Estate on 04/10/2020 with total 12 participants. Seen the meeting minutes with the following agendas discussed during the meeting:</p> <ul style="list-style-type: none"> i. Follow up actions from management review ii. Process performance and product conformity iii. Customer Feedback iv. Changes that could affect management system v. Internal Audit Result vi. Status of Corrective and Preventive Action vii. Recommendation for improvement viii. Announcement or training to workers/ staffs 	<p>Yes</p>

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> ix. Complaints and Grievances x. Other Matters 	
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	<p>The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.</p> <p>- Major compliance -</p>	<p>Management of Pasir Panjang Estate has established and implemented a continual improvement plan dated 27/01/2020 as below:</p> <ul style="list-style-type: none"> i. OSHA ii. Social iii. Environmental iv. Building v. Mechanisation <p>Tunjuk Laut Estate’s management has developed and implemented the continual improvement as below:</p> <ul style="list-style-type: none"> i. OSH ii. Social iii. Environmental iv. IPM v. Productivity <p>Bukit Payung Estate’s management has developed and implemented the continual improvement as below:</p> <ul style="list-style-type: none"> i. OSH ii. Social iii. Environmental 	Yes

Criterion / Indicator		Assessment Findings	Compliance
		iv. Productivity	
4.1.4.2	The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption. - Major compliance -	The estates have implemented new system, IDEAS to carry out bunch counting and as a system to record the attendance of the workers.	Yes
4.1.4.3	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. - Major compliance -	As to date management maintain current technology such as usage of IDEAS system to carry out bunch counting and recording of attendance of workers.	Yes
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes. - Major compliance -	KULIM (M) Berhad has developed Transparency Procedure with Doc. No.: SQD/SMS/1.0 dated 1/08/2020 where operating units to provide adequate information when requested by stakeholders on sustainability, social and legal issues when appropriate. Briefing of the adequate information was conducted on 07/10/2020 to all the stakeholders during stakeholder meeting.	Yes
4.2.1.2	Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where	Pasir Panjang Estate, Tunjuk Laut Estate and Bukit Payung Estate has implemented Enquiry Register Record to record any requests from stakeholders. Generally, the requests mainly are donation or	Yes

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Criterion / Indicator		Assessment Findings	Compliance
	<p>disclosure of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p>permission to access the road by stakeholders. The management will be responded to the requests and recorded in the Enquiry Register Record. So far there was no request on documents.</p> <p>The documents may be publicly available are listed in the Transparency Procedure such as:</p> <ul style="list-style-type: none"> i. Land tilte/ user rights ii. OSH plan iii. Plans and impact assessment relating to environmental and social impacts iv. HCV documentation v. Pollution prevention and reduction plans vi. Complaint and grievances details vii. Human Rights policy viii. Procedure for negotiation on compensation ix. Results of FPIC processes x. HCS documentation xi. Continuous Improvement Plan xii. And etc <p>Besides, the stakeholders could access to company's website, http://www.kulim.com.my/ to get the information such as annual report.</p>	
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p>	<p>KULIM (M) Berhad has established Consultation and Communication Procedure with Doc. No.: SQD/SMS/1.1 dated 1/08/2020 to ensure KULIM has an open and transparent communication methods with</p>	Yes

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Criterion / Indicator		Assessment Findings	Compliance
		local communities and other internal & external stakeholders. Modes of the communication are such as muster, meetings, campaigns, suggestion boxes, letter, email, social media, face to face communication and etc.	
4.2.2.2	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. - Minor compliance -	Assistant Manager of Pasir Panjang Estate and Bukit Payung Estate has appointed as Social Person In-Charge and appointment letter dated 02/06/2020 and 01/08/2020 was sighted. The Manager of Tunjuk Laut Estate has appointed Assistant Manager and Chief Clerk as Social Person-In-Charge to handle social issue in the estate. Appointment letter dated 01/01/2018 was available.	Yes
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. - Major compliance -	Pasir Panjang Estate, Tunjuk Laut Estate and Bukit Payung Estate has developed List of Stakeholders 2020. The stakeholder list has included categories such as government authorities, neighbouring plantations, local communities, contractors and suppliers. Stakeholder meeting was conducted on 07/10/2020 for whole Tunjuk Laut Complex (comprises of Pasir Panjang POM, Pasir Panjang Estate, Bukit Payung Estate and Tunjuk Laut Estate) that involved the participation of affected parties such as local communities, government authorities, contractors, neighboring plantations and etc. Issues raised during the meeting was responded by the management on the spot. Meeting minutes was sighted with recorded all the issues and responses. The issue raised during the meeting was incorporated in the Social Management Plan in Tunjuk Laut Estate. Details refer to Indicator 4.4.1.1.	Yes

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Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.2.3 – Traceability			
<p>4.2.3.1</p>	<p>The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s).</p> <p>- Major compliance -</p>	<p>Kulim (Malaysia) Berhad has developed Traceability Procedure with Doc. No.: SQD/SMS/1.2 rev.05 dated 1/8/2020. The aim of the procedure is to ensure that the implementation of company's sustainable management system (RSPO/ MSPO/ ISCC/ RSPO SCCS/ MSPO SCCS) is in line with the defined policies, procedures and other requirements. Sampled of the FFB Despatch Chit as below:</p> <p>Estate: Pasir Panjang Estate dated 12/10/2020 DB A No.: 68261 Lorry No.: JFA6198 Field/ Year: P11 Ticket No.: 083420 Weight: 17,320 kgs</p> <p>Estate: Tunjuk Laut Estate dated 9/3/2020 DB A No.: 128370 Lorry No.: LTL 7 Field/ Year: P16 Ticket No.: 089994 Weight: 7,730 kgs</p>	<p>Yes</p>
<p>4.2.3.2</p>	<p>The management shall conduct regular inspections on compliance with the established traceability system.</p> <p>- Major compliance -</p>	<p>Estate Managers have been appointed as the person responsible for traceability system to comply with the requirements. Seen the appointment letter SQD/ADMIN/026/20 dated 21/9/2020. Inspection during the receiving of FFB was conducted. The estates are using Avery Weigh-Tronix system to record the incoming of FFB.</p>	<p>Yes</p>

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Criterion / Indicator		Assessment Findings	Compliance
		To comply on regular inspection, plantation inspectorate will inspected each estate twice a year. In Tunjuk Laut estate latest inspection done on 23/9/2020.	
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	Estate Managers have been appointed as the person responsible for traceability system to comply with the requirements. Seen the appointment letter dated 21/9/2020.	Yes
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	There was no sale of FFB carried out by Siang Estate, Pasir Logok Estate and Bukit Kelompok Estate because all its FFB were sent to own company's mill. Records of FFB delivery to the mill were maintained and sampled recorded as below: i. Estate: Siang Estate dated 3/11/2019 Estate: Pasir Panjang Estate dated 12/10/2020 DB A No.: 68261 Lorry No.: JFA6198 Field/ Year: P11 Ticket No.: 083420 Weight: 17,320 kgs Estate: Tunjuk Laut Estate dated 9/3/2020 DB A No.: 128370 Lorry No.: LTL 7 Field/ Year: P16 Ticket No.: 089994 Weight: 7,730 kgs	Yes
4.3 Principle 3: Compliance to legal requirements			

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.3.1 – Regulatory requirements			
<p>4.3.1.1</p>	<p>All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p>	<p>Sampled of licenses and permits:</p> <p>Pasir Panjang Estate</p> <ul style="list-style-type: none"> a) MPOB license 578736002000 valid from 01/12/2020 – 30/11/2021. b) KPDNKK license (KPDNKK.J.KTG/PERMIT0033(PD) for Diesel (15,000L) valid until 30 Sept 2021 c) BAKAJ license (07/AKT/012) valid until 31 December 2020 <p>Tunjuk Laut Estate</p> <ul style="list-style-type: none"> a) MPOB license 501477102000 for transfer and sell the FFB, this license valid until 31/3/2021 b) JTK license for wages deduction on Mosque, PP3/29/168/2005 dated 1/11/2008 c) License form KPDNKK for Diesel (BPGK.JH.KTG. PERMIT 0046PD) valid until 28/9/2021 d) License for water abstraction from BAKAJ referred license BAKAJ/334/430/05/08/20 dated 31/12/2020 e) License for personal installation to comply with electricity supply act 1990 referred license no: 2020/02539 valid until 18/10/2021 <p>Tunjuk Laut Estate has obtained permit from Jabatan Tenaga Kerja Semenanjung Malaysia to make deduction on the mosque fund not more than RM 1/ month. The permit with Serial No.: PP3/29/168/2005 was sighted.</p> <p>Bukit Payung Estate</p> <ul style="list-style-type: none"> a) MPOB license 619520002000 for sell and transfer FFB valid 	<p>Yes</p>

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> until 31/8/2021. b) KPDNKK license for Diesel (KPDNKK.J.KTG/PERMIT0085(PD) for 10,000Liter valid until 4/3/2021 c) License from Suruhanjaya Tenaga for Generate and supply electricity to workers with total generate 276.65Kw valid until 4/8/2021. d) JTK license for wages deduction referred letter IK(NJ)U-21 dated 31/3/2019 for Skim Khairat Keluarga Perbdanan Johor. e) BAKAJ license for water abstraction (license no:07/A/KT/018 valid until 31/12/2020. f) SPAN license for water supply to workers, as per letter SPAN/EKS/(PT)/800-4(2)/5/10 dated 16 /10/2020. To comply with SPAN requirement management must conduct water analysis twice a year, as per verification water analysis record was available LW/1105/19 dated 18/12/2019 and LW/325/20 dated 2/6/2020. g) Written Approval from Suruhanjaya Tenaga regarding to elephant fencing referred letter OSJB201900008PGR dated 27/7/2020. 	
4.3.1.2	<p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>All applicable laws and regulations to their operation such as OSHA 1996, FMA 1978, Min. Housing and Amenities Act 1990 and others been listed.</p> <p>Kulim Group Compliance Framework dated 05/09/2019 for Siang Complex available for review.</p> <p>Kulim Group Compliance Framework dated 07/11/2019 for Tunjuk Laut Complex available for review.</p>	Yes

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Criterion / Indicator		Assessment Findings	Compliance
4.3.1.3	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>The following law and acts incorporated in the Kulim Group Compliance Framework for compliance August 2019:</p> <ul style="list-style-type: none"> a) Minimum wages order (Amendment) 2020 b) Employee Provident Fund Order 2020 c) Employee Minimum Standard of Housing Accommodation and Amenities act 2019 d) Employees Social Security (Exemption of Foreign Workers) (Revocation) Notification 2018 	Yes
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	<p>Siang Complex The management had appointed Cik Nurfazliwati Suzana Bt Zainal (Executive Regional Controller) as person responsible for legal compliance for updating changes in laws and compliance monitoring (refer to letter ref (14) RMC/COM/GM/18/09 dated on 27 June 2018).</p> <p>Tunjuk Laut Complex The management had appointed Puan Norazimah Abas (Executive Regional Controller) as person responsible for legal compliance for updating changes in laws and compliance monitoring (refer to letter ref (12) RMC/COM/GM/18/07 dated on 27 June 2018).</p> <p>Tracking system available to identify changes in the relevant regulations through head office under Risk Management and Compliance Department and site representative. Tracking system on any changes in the law been well implemented.</p>	Yes
<p>Criterion 4.3.2 – Lands use rights</p>			

Criterion / Indicator		Assessment Findings	Compliance
4.3.2.1	<p>The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.</p> <p>- Major compliance -</p>	<p>The usage of the lands in KULIM are under Oil Palm cultivation and do not diminish the land use rights of other users through interviewed with the communities.</p>	Yes
4.3.2.2	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.</p> <p>- Major compliance -</p>	<p>The lands are belonging to Johor Corporation by verified the land title. Sampled the land titles as below:</p> <p><u>Pasir Panjang Estate:</u></p> <p>There are total 1 land title found in the estate.</p> <p>i. Title No.: 35107; Lot PTD 558 Total HA: 1,609.869 ha</p> <p>However, JUPEM has carried out assessment and informed that the actual land title area is 1,706.00 ha. Seen the email correspondence related to this conflict dated 06/08/2020. Land Department in HQ has consulted Land Department Kota Tinggi and they informed Kulim (M) Berhad to contact JUPEM regarding this issue. Kulim is in the progress to arrange appointment with JUPEM to discuss this issue. The auditor to verify this issue on the next assessment.</p> <p>Kulim (M) Berhad to follow up with JUPEM & Land Department on this conflict of land title area.</p> <p><u>Tunjuk Laut Estate:</u></p> <p>There are total 2 land titles found in the estate. The titles are as below:</p> <p>i. Title No.: 13894; Lot 252 Total HA: 28.02 ha</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
		ii. Title No.: 7747; Lot PTD 36 Total HA: 2,839.7879 ha <u>Bukit Payung Estate:</u> There are total 2 land titles found in the estate. The titles are as below: i. Title No.: 35105; Lot PTD 4143 Total HA: 2,282.6 ha ii. Title No.: 35106; Lot PTD 4144 Total HA: 25.03 ha	
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	The usage of the lands in KULIM are under Oil Palm cultivation and do not diminish the land use rights of other users through interviewed with the communities. Verified the photo found that there were boundary pegs sighted to demarcate the boundary.	Yes
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There is no land dispute in the Pasir Panjang Estate, Tunjuk Laut Estate and Bukit Payung Estate at the time of audit. The land belongs to Kulim (Malaysia) Berhad and land ownership documents verified.	Yes
Criterion 4.3.3 – Customary rights			

Criterion / Indicator		Assessment Findings	Compliance
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	There is no customary land or negotiated agreements within the Pasir Panjang Estate, Tunjuk Laut Estate and Bukit Payung Estate land area confirmed through document reviewed.	Yes
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should be made available. - Minor compliance -	There is no customary land or negotiated agreements within the Pasir Panjang Estate, Tunjuk Laut Estate and Bukit Payung Estate land area confirmed through document reviewed.	Yes
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	There is no customary land or negotiated agreements within the Pasir Panjang Estate, Tunjuk Laut Estate and Bukit Payung Estate land area confirmed through document reviewed.	Yes
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	Sustainability & Quality Department has conducted SIA on 14/09/2020 in Pasir Panjang Estate, 05/10/2020 in Tunjuk Laut Estate and 14/09/2020 in Bukit Payung Estate during internal audit. The assessment has involved participation of internal workers and shops' owners. Checklist Interview was utilized during interview with the contractor for SIA. The social impact register is developed based on the scoring of frequency, consequence and likelihood. Social Management Plan will be developed after the social impact register established. The last review of the social management plan was on 15/10/2020 in Pasir Panjang Estate, 15/10/2020 in Tunjuk Laut Estate and 15/10/2020 in Bukit Payung Estate with identification of negative and positive impacts. Mitigation and promotion actions were taken accordingly to the impacts identified. For eg:	Yes

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Criterion / Indicator		Assessment Findings	Compliance
		<p>1) Issue: Contract’s workers did not have the employment contract with all the terms and conditions spelled out in the contract signed.</p> <p>Improvement Plan: Estate’s management need to explain to the contractors on the terms and conditions that need to be included in the contract.</p> <p>Action taken: A meeting with contractors was conducted on 15/10/2020 to explain the legal, RSPO and MSPO requirements to the contractors. Seen the meeting attendance list and meeting slides.</p> <p>2) Issue: Neighbouring estate requested Tunjuk Laut Estate management to desilt the drainage system bordering with the estate to prevent flood.</p> <p>Improvement Plan: Estate’s management will meet up with the stakeholder to discuss the issue.</p> <p>Action taken: A meeting with the stakeholder was conducted on 25/11/2020 to inspect the said area. The root cause of the issue was found and desilting activity could not be done due to the drainage system is under local authorities. A replied letter was issued to the stakeholder on 26/11/2020.</p>	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p>- Major compliance -</p>	<p>KULIM (M) Berhad has developed Grievance Procedure with Doc. No.: SQD/SMS/4.1 dated 01/08/2020 to ensure KULIM has a documented system for dealing with complaints and grievances that is agreeable to</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
		all sides and accepted by all stakeholders. Dispute resolution mechanisms are established through open and consensual agreements with affected parties. Procedure has outlined the process of complaint management. The timeline to resolve the grievances is clearly stated in the procedure which is within 26 days for internal employees and 21 days for other stakeholders.	
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. - Major compliance -	<p>Pasir Panjang Estate and Tunjuk Laut Estate have implemented Complaint Book for housing repair and Enquiry Register Book to record any complaint and grievances from internal and external stakeholders. Sampled the complaints as below:</p> <ul style="list-style-type: none"> i. House No.: 51 dated 26/02/2020 Issue: Broken sink Action: Seen the photo evident of the replacement of new sink. ii. House No.: A5 dated 19/11/2020 Issue: Broken drainage Action: The action has been taken on 22/11/2020 and seen the photo evident of the repaired of the drainage. <p>The complainant has acknowledged after the issue was resolved. Records of acknowledgement was sighted.</p>	Yes
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - Minor compliance -	Complaint Box was available in front of the office as verified through the photos.	Yes

Criterion / Indicator		Assessment Findings	Compliance
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance -	Complaint Box was available in front of the office as verified through the photos. Besides, a briefing on the complaint procedure to the workers was conducted on 03/12/2020 in Pasir Panjang Estate and 30/11/2020 to workers in Bukit Payung Estate. The stakeholders were briefed during the stakeholder meeting conducted on 07/10/2020.	Yes
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance -	Complaint records from December 2018 were maintained.	Yes
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - Minor compliance -	The estates' management have made contribution to the local communities such as provide job opportunities to the local people. Besides, the Pasir Panjang Estate's management has contributed daily essential goods to the one in needs during the pandemic period such as rice. Face mask was distributed to all the workers as well. Besides, Tunjuk Laut Estate has made contribution to local communities such as made donation to school's event upon request.	Yes
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance -	Occupational Safety & Health Policy had been established and implemented. The policy signed by the Executive Director of Kulim (Malaysia) Berhad on 01/05/2018 and displayed prominently on notice boards in Bahasa Malaysia and English. The policy already communicated through morning muster and during the stakeholders meeting.	Yes

Criterion / Indicator		Assessment Findings	Compliance
		<p>The estates have established Safety and Health Management Plan and documented in Environment, Safety and Health Plan FY 2020. The management plan includes the ESH risk management, Emergency Response Procedure, Chemical Safety Management, Noise Boundary Monitoring, Health monitoring.</p> <p>The OSH Policy have been effectively communicated to all the respective estate workers and staffs as below: Tunjuk laut Estate – 10/1/2020</p>	
4.4.4.2	<p>The occupational safety and health plan shall cover the following:</p> <ul style="list-style-type: none"> a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: <ul style="list-style-type: none"> i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe 	<ul style="list-style-type: none"> a) The occupational safety & health policy was communicated and implemented through daily toolbox meetings/briefings and trainings. The briefing includes among others to priorities safety, execute work safely, adherence to all safety rules and regulations and to target for zero accident. The policy communicated to the staff and workers. On-site supervisors and estates assistant managers ensure the implementation of it. b) A Hazard Identification Risk Assessment and Risk Control (HIRARC) document for the estates operations available. Sampling in Pasir Panjang estate reviewed on 23/10/2020. Risk assessment carried on activities such as spraying, fertilizer, harvesting, pruning and other activities. For Chemical Hazard Risk Assessment been conducted for each chemical used in estate such as:- Pasir Panjang estate CHRA (JKKP HQ/03/ASS/00/154/-2018/047) by QMSPRO Sdn Bhd dated 24 April 2018. The chemical included herbicide, pesticide and fungicide. c) The training programme available for each operation activity based on evaluation score. Sampling on training been done 	Yes

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Criterion / Indicator	Assessment Findings	Compliance															
<p>handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>according to the OSH plan and training programme. Referred indicator 4.4.6.1.</p> <p>d) The management already provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). Sampling implementation on sprayer and harvester team PPE record.</p> <table border="1" data-bbox="1151 710 1868 1359"> <thead> <tr> <th>Workers Id</th> <th>Type of work</th> <th>PPE/Date</th> </tr> </thead> <tbody> <tr> <td>628055</td> <td>Sprayer</td> <td>Safety Gogle/Aug 2020 Filter/ Nov 2020 Apron/March 2020 Nitril glove/Aug 2020</td> </tr> <tr> <td>627986</td> <td></td> <td>Filter/ Nov 2020 Apron/Sept 2020 Nitril glove/Nov 2020</td> </tr> <tr> <td>627984</td> <td>Harvester</td> <td>Safety helmet/June 2020 Rubber boot/ July 2020</td> </tr> <tr> <td>627953</td> <td></td> <td>Sickle cover/ July 2020 Safety helmet/Oct 2020</td> </tr> </tbody> </table>	Workers Id	Type of work	PPE/Date	628055	Sprayer	Safety Gogle/Aug 2020 Filter/ Nov 2020 Apron/March 2020 Nitril glove/Aug 2020	627986		Filter/ Nov 2020 Apron/Sept 2020 Nitril glove/Nov 2020	627984	Harvester	Safety helmet/June 2020 Rubber boot/ July 2020	627953		Sickle cover/ July 2020 Safety helmet/Oct 2020	
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Criterion / Indicator	Assessment Findings	Compliance
	<p>e) The management had established Standard Operating Procedure for handling of chemicals, Doc SDM/WI/9 Rev 0 dated 01/07/2017 to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labelling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. Chemicals were handled as per the requirements in SDS/CSDS, CHRA, HIRARC and SOP (Doc SDM/WI/9 Rev 0 dated 01/07/2017).</p> <p>f) All the sampled estates have appointed an OSH Committee Members to address all Osh related issues in the estates. The OSH Organisational Chart was available for verification together with the appointment letters of all members. Sampling OSH Chairman were appointed as follows: All Estate: 21.09.2020; Doc Number: SQD/ADMIN/023/20; Undersigned by Chairman, Safety and Health Main Committee Kulim (M) Berhad.</p> <p>g) OSH meeting conducted quarterly, and meeting minutes was available. These meetings were to conduct regular two-way communication with their employees. Below sampled record:- Tunjuk Laut estate: 22/9/2020 (03/2020), attended by 26 person. And previous meeting was conducted on June 2020. Bukit Payung estate: 03/2020 was conducted on 8/9/2020 and previously meeting 02/2020 was on 27/7/2020.</p> <p>h) Accident and emergency procedures were available at the estate. There is a formation of ERP Team & ERP for all the identified incidences (Fire, Flood, Wild Animal Attack,</p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Chemical Spillage & Strike). The ERP Team was appointed, and the organizational chart was available together with the emergency contact list. Fire extinguishers were available with regular monitoring. The training been conducted and verified as per training record under 4.4.6.1</p> <p>i) A list of first aiders were available at the estate comprising of all main work operations and stores. First Aid boxes were assigned to the respective first aiders. Monthly First Aid Box inspection was conducted by the Medical Assistant at the estate. The first aid kit holders are trained on a regular basis and with refresher trainings. The First Aid Training was conducted on:- Tunjuk Laut estate – 13/10/2020 Pasir Panjang estate – 6/10/2020</p> <p>j) For Accident record, each estate already followed and comply as per DOSH requirement, verification as per record below:- Pasir Panjang estate: JKKP 8: JKKP8/56392/2019 dated 30/01/2020 JKKP 6: 1 accident happen on 2020 dated 27/02/2020. Tunjuk Laut Estate JKKP 8: JKKP 8/51468/2019 dated 29/1/2020 JKKP 7: 1 cases happen dated 17/11/2020 JKKP 6: 1 cases dated 4/7/2020 in harvesting area. Bukit Payung estate JKKP 8: JKKP8/45470/2019 dated 9/1/2020 JKKP 7: 1 cases on 17/11/2020 on spraying operation JKKP 6: 1 cases on 7/12/2020 on manuring operation</p>	

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.4.5: Employment conditions			
4.4.5.1	The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees. - Major compliance -	KULIM (Malaysia) Berhad has developed Sustainability Policy where the company respects, supports and upholds fundamental human rights and does not engage in any discrimination of race, religion and gender. Briefing of the policy was conducted on 02/12/2020 to the workers in Pasir Panjang Estate, 17/11/2020 in Tunjuk Laut Estate, 16/10/2020 in Bukit Payung Estate and 07/10/2020 for stakeholders.	Yes
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - Major compliance -	KULIM (Malaysia) Berhad has established Core Labour Standard Policy dated 01/05/2018 where the company will not engage in nor support discrimination in any form. Briefing of the policy was conducted on 12/11/2020 to the workers in Pasir Panjang Estate, 02/10/2020 in Tunjuk Laut Estate, 27/11/2020 in Bukit Payung Estate and 07/10/2020 for stakeholders.	Yes
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance -	There were employment contracts for checkroll workers and contractors' workers. Pay and conditions are documented and above the Minimum Wage Order 2020. Sampled of employment contracts confirmed that terms and conditions are clearly and have been signed by the worker. Sampled of payslip for March 2020, June 2020, September 2020 found that the workers have achieved Minimum Wage Order 2020.	Yes
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.	All the sampled estates have appointed contractors for activities such as harvesting and FFB transportation. Reviewed the payslips and productivity records found that the workers were paid as per the Minimum Wage Order 2020 and as agreed in the employment contract signed by the workers.	Yes

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Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -		
4.4.5.5	<p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>Pasir Panjang Estate has implemented I-Plantation System to record and maintain the overview of checkroll employees in Employee Master Info. Details such as full name, gender, date of birth, date of entry, job description and type of wages was found in the system.</p>	Yes
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>The employees that recruited by the estates are from local and foreign workers. They are under direct employment and contract workers to the estates. All of them have signed on the employment contract prior to work. Terms and conditions were clearly stated in the contract. Total sampled 69 employment contracts for both checkroll and contract's workers were reviewed.</p>	Yes
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p> <p>- Major compliance -</p>	<p>All the daily attendance was recorded by IDEAS system on daily basis and overtime was recorded in the Overtime Record.</p>	Yes
4.4.5.8	<p>The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.</p> <p>- Major compliance -</p>	<p>Document reviewed on the Checkroll Attendance as well as payslip shown that the overtime payments are in accordance to law and workers are given freedom to work overtime.</p>	Yes

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Criterion / Indicator		Assessment Findings	Compliance
4.4.5.9	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p>- Major compliance -</p>	<p>Wages and overtime were paid according to the IDEAS I-Plantation system. Total hours of overtime and daily attendance has recorded in Overtime Form and Attendance Edit List. Total sampled 69 payslips for both checkroll and contract's workers were reviewed. All of them above have achieved the Minimum Wage 2020.</p>	Yes
4.4.5.10	<p>Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions.</p> <p>- Minor compliance -</p>	<p>The company provided free medical facilities to all the workers. Free water and electricity were supplied to all the workers.</p>	Yes
4.4.5.11	<p>In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.</p> <p>- Major compliance -</p>	<p>The management has provided free living facilities to all the workers with free water and electricity supply. KULIM has developed a procedure of Linesite with Doc. No.: SQD/WI/10 dated 01/01/2020 to explain the cleanliness and maintenance of the housing area. Linesite inspection was carried out on weekly basis as per the procedure in Pasir Panjang Estate, Tunjuk Laut Estate and Bukit Payung Estate. The inspection was conducted by Estate Hospital Assistant and verified by the Assistant Manager and Manager. Records of the Linesite Inspection were verified.</p>	Yes
4.4.5.12	<p>The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- Major compliance -</p>	<p>KULIM (Malaysia) Berhad has developed Sexual Harassment Policy dated 01/05/2018 where the company seeks to eradicate all forms of sexual harassment in the workplace and wherever possible influence the behavior of its employees. KULIM has a zero tolerance on sexual harassment. Besides, the company has established Core Labour Standard Policy dated 01/05/2018 where the company recognized and respects the right of employees of their rights and freedoms relating to reproduction and reproductive health. Briefing of the policy</p>	Yes

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Criterion / Indicator		Assessment Findings	Compliance
		<p>was conducted on 02/12/2020 and 12/11/2020 to the workers in Pasir Panjang Estate, 20/01/2020 in Tunjuk Laut Estate, 21/01/2020 and 27/11/2020 in Bukit Payung Estate and 07/10/2020 for stakeholders.</p> <p>A Women on Ward (WOW) committee was established in the estates and meeting was conducted on 28/09/2020 in Pasir Panjang Estate, 30/09/2020 in Tunjuk Laut Estate and 21/02/2020 in Bukit Payung Estate. Seen the meeting minutes found that the chairman has briefed on the complaint procedure and function of committee to all the members. No issue was reported during the meeting.</p>	
4.4.5.13	<p>The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>	<p>Kulim (Malaysia) Berhad has established Core Labour Standard Policy dated 1/05/2018 where the company recognized and respected the rights of employees to form and/ or join trade unions of their choice which are given due recognition by KULIM. The policy was in bi-lingual which is Bahasa Malaysia and English. Briefing of the NUPW was conducted on 30/10/2020 in Pasir Panjang Estate.</p> <p>The meeting conducted has involved NUPW representatives, other nationalities' worker representatives and shops' representatives for Pasir Panjang POM, Pasir Panjang Estate and Bukit Payung Estate. The last meeting was carried out on 13/09/2020. There were issues raised by the committee in during the meeting and recorded in the meeting minutes. The management has developed an action plan for the issues raised during the meeting. Seen the records of action</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
		<p>taken for the issues raised by representative from Pasir Panjang Estate.</p> <p>Tunjuk Laut Estate has conducted NUPW meeting with the management on 13/08/2020 and meeting minutes was sighted. There was no issue reported during the meeting. The management has conducted awareness briefing on freedom of association to the workers on 29/09/2020 and record of briefing was sighted.</p> <p>NUPW meeting between management and the representatives was conducted on 16/08/2020 in Bukit Payung Estate. No issue was reported as verified through the meeting minutes.</p>	
4.4.5.14	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not exposed to hazardous working conditions.</p> <p>- Major compliance -</p>	<p>KULIM (Malaysia) Berhad has established Core Labour Standard Policy dated 1/05/2018 where they are not engaged in or support the use of Child Labour and will provide adequate support to enable children of its employees to attend and remain in school until no longer a child. Briefing of the policy was conducted on 12/11/2020 to the workers in Pasir Panjang Estate, 02/10/2020 in Tunjuk Laut Estate, 27/11/2020 in Bukit Payung Estate and 07/10/2020 for stakeholders. Document verified the master list of the workers confirmed that the minimum age of workers employed are above 18 years.</p>	Yes
Criterion 4.4.6: Training and competency			
4.4.6.1	<p>All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of</p>	<p>Kulim (Malaysia) Berhad has established an annual training program that covers all aspects of the RSPO Principles and Criteria, RSPO Supply Chain and MSPO standards.</p>	Yes

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Criterion / Indicator	Assessment Findings	Compliance																		
<p>training needs and documentation, including records of training shall be kept.</p> <p>- Major compliance -</p>	<p>Awareness and training programed had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding SDS, safe working practices and the correct use of PPE.</p> <p>The records included the title of training, name and signature of the attendees, name of the trainer, time and venue.</p> <p>Pasir Panjang estate</p> <table border="1" data-bbox="1048 756 1615 1383"> <thead> <tr> <th>Date of training</th> <th>Type of training</th> <th>Participant</th> </tr> </thead> <tbody> <tr> <td>2 Jan 2020</td> <td>Spraying training and technique</td> <td>24 workers</td> </tr> <tr> <td>8 Jan 2020</td> <td>Manuring-mechanical spreader</td> <td>7 Workers</td> </tr> <tr> <td>2 Jan 2020</td> <td>Buffer zone and HCV training</td> <td>24 workers</td> </tr> <tr> <td>4 Feb 2020</td> <td>Waste and Landfill training</td> <td>5 workers</td> </tr> <tr> <td>13 Sept 2020</td> <td>Scheduled waste training</td> <td>8 workers</td> </tr> </tbody> </table>	Date of training	Type of training	Participant	2 Jan 2020	Spraying training and technique	24 workers	8 Jan 2020	Manuring-mechanical spreader	7 Workers	2 Jan 2020	Buffer zone and HCV training	24 workers	4 Feb 2020	Waste and Landfill training	5 workers	13 Sept 2020	Scheduled waste training	8 workers	
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Criterion / Indicator		Assessment Findings			Compliance
		26 Aug 2020	First aid training	10 workers	
		Tunjuk Laut Estate			
		Date of training	Type of training	Participant	
		16/1/2020	Manuring Training	6	
		17/2/2020	Spraying training	13	
		28/2/2020	Fire Drill training	All workers	
		23/1/2020	Spill containment training	5	
		27/11/2020	Bagworm training	4	
		27/11/2020	IPM training		
		13/10/2020	First aid training	17	
		Bukit paying estate			
		Date of training	Type of training	Participant	

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Criterion / Indicator		Assessment Findings			Compliance
		13/2/2020	Manuring training	11	
		20/1/2020	Harvesting training	11	
		20/1/2020	Spraying training	6	
		20/2/2020	Water treatment training	4	
		29/8/2020	Elephant incursion partrolling Briefing	10	
		5/12/2020	Tractor/Lorry safety driving training	12	
		29/1/2020	Fogging training	1	
		9/9/2020	First aid training	21	
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.	Training needs of individual employees identified prior to the planning and implementation of the training programs. This was in order to provide the specific skill and competency required to all employees based on their job description. a) Sighted the Training Program and Refresher & Awareness Program (Doc no: SQD/SMS/3.14-F1) for year 2020 is available.			Yes

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.4.6.3	<p>A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.</p> <p>- Minor compliance -</p>	<p>It was evident that from the training programs & records of all trainings are planned and implemented to ensure that all employees are well trained in their job function and responsibility.</p>	Yes
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	<p>An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>Kulim (M) Plantation has established an Environmental Policy signed by Executive Director, Mr. Zulkifly Zakariah dated 01.05.2018. The policy has been established, communicated to all employees, displayed at notice board and continuously implemented by the management. The policy has been recently communicated to the workers and staffs of the estates as below: Tunjuk Laut Estate: 17/11/2020</p>	Yes
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <ul style="list-style-type: none"> a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations. <p>- Major compliance -</p>	<p>Kulim (M) Plantation has established an Environmental Policy signed by Executive Director, Mr. Zulkifly Zakariah dated 01.05.2018. The policy indicated the commitment of the organization to protect the environment during the course of their business.</p> <p>An aspect and impact analysis were conducted by the estate to assess all possible environmental risks associated to the operations in the estate. The Environmental Risk Assessment Form was available for all operations together with the possible environmental risks it can cause. The risk control is stated to ensure the operation</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
		limits the environmental impact it causes. Sighted the ERA form for Clinic, Compound, Harvesting, Workshop and Replanting. The Environment Assessment is done on a yearly basis or as and when there are changes in the operations that could impact the environment. The latest review was Jan 2020.	
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored. - Major compliance -	The estate management have developed a yearly Environmental Improvement Plan to address the possible environmental impacts due to the operations. In the management plan to mitigate negative impact such as to clean and monitoring the PCD to prevent contamination water. Verification as per PCD monitoring record 27/11/2020.	Yes
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	The program to promote the positive impacts were documented in several management plans such as environmental management plan, energy management plan, pollution and emission management plan, water management plan and waste management plan.	Yes
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives. - Major compliance -	Estates visited has established training program for all workers based on training need analysis conducted on annually basis including the environmental policy and awareness. Sighted the trainings conducted as below: Tunjuk Laut: <ul style="list-style-type: none"> • Triple rinse training and environment awareness – 3/9/2020 • Waste Cleaning and Landfill Training – 11/8/2020 • Scheduled Waste Training – 13/9/2020 Conduct monitoring on SW- 26/11/2020	Yes
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.	The estates conduct regular Environmental Meeting to address the environmental issues and possible improvements that can be done in the work process to reduce the operational impacts to the	Yes

Criterion / Indicator		Assessment Findings	Compliance											
	- Major compliance -	environment. The Environmental Management Meeting Minutes were available and verified as below: Tunjuk Laut estate: - 19/11/2020 Bukit Payung estate: - 27/7/2020												
Criterion 4.5.2: Efficiency of energy use and use of renewable energy														
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period. - Major compliance -	Consumption of non-renewable energy was been optimized and closely monitored by management, the establishing baseline values and trends is be observed within an appropriate timeframe. Similarly, planting of beneficial plants reduces the usage of fuel (and chemical) by motorize spray.	Yes											
4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. - Major compliance -	The estimation for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate annual budgets. <table border="1" data-bbox="1048 1109 1617 1361"> <thead> <tr> <th>Estate</th> <th>Year</th> <th>Diesel/ tan FFB</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Pasir Panjang</td> <td>2019</td> <td>20.23</td> </tr> <tr> <td>2020(Todate Nov)</td> <td>16.04</td> </tr> <tr> <td>Tunjuk Laut</td> <td>2019</td> <td>5.06</td> </tr> </tbody> </table>	Estate	Year	Diesel/ tan FFB	Pasir Panjang	2019	20.23	2020(Todate Nov)	16.04	Tunjuk Laut	2019	5.06	Yes
Estate	Year	Diesel/ tan FFB												
Pasir Panjang	2019	20.23												
	2020(Todate Nov)	16.04												
Tunjuk Laut	2019	5.06												

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Criterion / Indicator		Assessment Findings			Compliance
			2020(Todate Nov)	3.88	
		Bukit Payung	2019	5.91	
			2020(Todate Nov)	5.49	
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	There was no suitable area identified for the use of renewable energy at the sampled estates.			Yes
Criterion 4.5.3: Waste management and disposal					
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	The identification of wastes products and sources of pollution were documented in EAI, Waste and Pollution Management Plan and also DOE's Scheduled Wastes Second Schedule. In general, among the wastes identified were domestic wastes, recyclable wastes, scheduled wastes and sewerage waste water.			Yes
4.5.3.2	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for: a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products - Major compliance -	Waste and Pollution Management Plan was established based on environmental aspect identification. The plan includes identifying and monitoring sources of waste and pollution, action required such as recycling of palm by-product into the field as nutrient, Reuse, Reduce and Recycle, and the method of disposal of each identified waste. Domestic wastes, especially food waste after segregation at source are tied in used fertilizer bag for disposal at estate operated landfill.			Yes
4.5.3.3	The management shall establish Standard Operating	Kulim Plantation had established Work Instruction, Doc Number: SW/WI/22; Waste Management and Work Instruction, Doc Number:			Yes

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Criterion / Indicator	Assessment Findings	Compliance
<p>Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p>- Major compliance -</p>	<p>SPO/WI/06; Scheduled Waste to ensure proper and safe handling, storage and disposal in accordance to EQ (Scheduled Wastes) Regulations 2005.</p> <p>The procedures for safe handling, storage and disposal of used chemicals classified under Environment Quality Regulation (Scheduled Waste) 2005, Environmental Quality Act, 1974 are available prepared at Group level by Sustainability Department and implemented in all estates for all the applicable practices. Verification of consignment notes showed that the estates disposed their used chemical such as spent oil through DOE License Contractor.</p> <p>Pasir Panjang estate</p> <p>Sampling on SW 110, latest disposal was on 9/11/2020 Consignment note 2020110916FRUB0J with total 0.002 MT to Kualiti Alam Sdn Bhd</p> <p>Tunjuk laut estate</p> <p>Sampling on SW 305, latest disposal was on 16/11/2020 Consignment note 090041-001 with total 55 gallon to Kualiti Alam Sdn Bhd.</p>	
<p>4.5.3.4 Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p>	<p>Empty pesticide containers was be punctured and disposed in an environmentally and socially responsible way and dispose at G-Planter. The triple rinse procedure can be referring working instruction dated Dec 2016 by SPO Team. The record of disposal was available for reviewed. Sampling as per below record :-</p> <p>Pasir Panjang estate Date;15/7/2020</p>	<p>Yes</p>

Criterion / Indicator		Assessment Findings	Compliance										
	- Major compliance -	<p>Company: G-Planter</p> <table border="1"> <thead> <tr> <th>Type container</th> <th>Pieces</th> </tr> </thead> <tbody> <tr> <td>4Liter</td> <td>168</td> </tr> <tr> <td>20 liter</td> <td>72</td> </tr> <tr> <td>25 liter</td> <td>26</td> </tr> <tr> <td>Box</td> <td>22</td> </tr> </tbody> </table> <p>Tunjuk Laut estate Dispose as Scheduled waste as per detail below: - SW 409 Date: 26/11/2020 Consignment note: 090946-006 Company: Kualiti Alam Sdn Bhd Total: 3 jumbo bags</p>	Type container	Pieces	4Liter	168	20 liter	72	25 liter	26	Box	22	
Type container	Pieces												
4Liter	168												
20 liter	72												
25 liter	26												
Box	22												
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. - Minor compliance -	Domestic wastes from the linesites were buried in a designated landfill in the oil palm estates. Based on SOP, no toxic wastes such as spent lubricants, empty chemical containers, used lab chemical, etc. were permitted to be disposed in the rubbish pit. The location of the landfill was also far from residential area and water ways based on the estate map provided. The weekly domestic waste disposal records were available and verified for all estates.	Yes										
Criterion 4.5.4: Reduction of pollution and emission													
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid	Assessment of polluting activities were available in the Pollution and Emission Management Plan in all estates. The Management Plan	Yes										

Criterion / Indicator		Assessment Findings	Compliance
	wastes and effluent. - Major compliance -	identified the source of pollution, activity, possible threat, action plan, time frame, records and responsibility.	
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	The action plans to reduce identified significant pollutants and emissions has been documented in Waste, Pollution and Emission Management Plan and implemented. Example, <ul style="list-style-type: none"> Weekly linesite inspection and check to ensure no septic tank overflow & spillage. Else, immediate action must be taken to contain overflow & spills. Daily inspection / routine maintenance on vehicles to reduce emission of dark smoke or emission of air pollutant Routine maintenance to be carried out as per schedule and inspection of vehicle condition to reduce emission of noise. Apply bio compost to recycle nutrient from the EFB instead of fertilizer usage to reduce emission of GHG 	Yes
Criterion 4.5.5: Natural water resources			
4.5.5.1	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: <ol style="list-style-type: none"> Assessment of water usage and sources of supply. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, 	Water Management Plan was available for the estates audited. The management plan includes the water source, action plan to reduce water contamination, associated records and PIC. The management plan is reviewed on a yearly basis. Tunjuk Laut estate <ol style="list-style-type: none"> Water Management Plan (01.08.2020) <ul style="list-style-type: none"> Pollution Control Device (PCD); PCD must be inspected to ensure the effectiveness. During scheduled cleaning of PCD, collect the pollutants and place at the scheduled waste store. Septic Tank Overflow & Spillage; Conduct weekly linesite inspection and check to ensure no septic tank overflow & spillage. 	Yes

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Criterion / Indicator		Assessment Findings	Compliance
	<p>maintenance of equipment to reduce leakage, collection of rainwater, etc.).</p> <p>d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</p> <p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p>- Major compliance -</p>	<p>Immediate action must be taken in case of any overflow or spillage.</p> <p>2. Tunjuk Laut Estate have conducted a Rapid Biodiversity Assessment with the report available for verification dated 3 July 2008. The report states that the estate is surrounded by smallholders and river bank of Sungai Temubur Kiri and Sg Gemereh. There were a clear and visible buffer zone demarcated as Riparian Reserve. Based on the photo evidence the buffer zone is well maintained with natural vegetation and there are appropriate signboards prohibiting use of chemicals or fertilizers at the area.</p> <p>3. Water Sampling was conducted at the inlet and outlet of the Sg Temubur and Sg Gemereh that is boundary with the estate to monitor the possible impact that the estate operations could cause the water course. The water sampling report was available for verification as below:</p> <ul style="list-style-type: none"> • Date: 2/11/2020 • Report Number: WI/2020/10/40 • Sample Tested by: UTCL Laboratory • Results: All 4 samples were within the limit specifications. 	
4.5.5.2	<p>No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p>- Minor compliance -</p>	<p>Due to the Covid 19 ongoing pandemic, onsite verification was unable to be conducted. Based on site visit conducted during the previous assessment, there was no construction of bunds, weirs or dams observed.</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance		
4.5.5.3	<p>Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles).</p> <p>- Minor compliance -</p>	<p>Due to the Covid 19 ongoing pandemic, onsite verification was unable to be conducted. Based on site visit conducted during the previous assessment, it was noted during that all the visited estates that many silt pits were prepared by the road sides to capture rain water in order to maintain the moisture content in the field. At estate offices and workshop sighted the practice of rainwater harvesting.</p>	Yes		
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value					
4.5.6.1	<p>Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:</p> <p>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</p> <p>b) Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.</p> <p>- Major compliance -</p>	<p>Rapid Biodiversity Assessment of 10 Oil Palm Plantations of JCORP by Biodiversity Consultant, A.J.F.M. Dekker conducted on 3 July 2008. The report has identified the list of natural habitats that is possible present in the operating units.</p> <p>The report details the findings of a rapid appraisal of the biodiversity in the estates and addresses the RSPO P&C relevant to biodiversity conservation and HCV. Therein being provided details relating to the following;</p> <p>a) General biodiversity issues b) Watercourses and drainage c) Habitats natural and man-made d) Wildlife e) Ponds and reservoirs f) Wetlands /watercourses g) Legal aspects h) Immediate and long-term effect.</p> <p>In Pasir Panjang estate; -</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Type</td> <td style="width: 50%;">Hectarage</td> </tr> </table>	Type	Hectarage	Yes
Type	Hectarage				

Criterion / Indicator		Assessment Findings		Compliance		
		Steep unplantable (RBA 10)	18.09			
		Reservoir & Buffer Zone (RBA 5)	8.54			
		Pond & Buffer Zone (RBA 3)	0.65			
		Steep unplantable (RBA 2)	6.29			
		Undeveloped Forest (RBA 1)	97.34			
		In Tunjuk Laut estate				
		Type of conservation	Hectarage			
		Pond	6.21			
		Undeveloped	8.84			
		Steep Zone	6.14			
		Buffer zone	7.49			
		Swampy	0.55			
		Bukit Payung estate				
		Type of conservation	Hectarage			
		Swampy	23.52			
		Pocket forest	60.86			
		Reservoir	184.39			

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Criterion / Indicator		Assessment Findings		Compliance
		Steep area	8.99	
		Grassland	5.88	
		Steep area	1.68	
4.5.6.2	<p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>a) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p>- Major compliance -</p>	<p>The Biodiversity improvement plan is available dated 1/1/2020 this action is for appropriate measures to take to ensure the protection of the area.</p> <p>Action plan such as to put proper signage for no hunting, no fishing to ensure no encroachment, to maintain the area with have a patrol and monitoring and to educate stakeholder and workers regarding to biodiversity area and HCV. As per record 7/10/2020 in stakeholder meeting management already give awareness regarding HCV to stakeholder.</p>		Yes
4.5.6.3	<p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p>- Major compliance -</p>	<p>Among the management plan implemented were establishment of buffer zones, regular education to workers on importance of conservation areas, patrol reports, animal sighting records and signage of restriction of hunting, fishing and collecting.</p>		Yes
Criterion 4.5.7: Zero burning practices				
4.5.7.1	<p>Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice.</p> <p>- Major compliance -</p>	<p>The operating units adhered to the policy of "Zero open burning" for any replanting. From field visits and interviews with the workers there is no open burning being practiced in the estates. For replanting land preparation, palms are felled, chipped and windrowed as required in the company's procedure.</p>		Yes

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Criterion / Indicator		Assessment Findings	Compliance
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. - Major compliance -	No open burning noted based on the records on the land clearing and felling for the replanting at sampled estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Yes
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. - Major compliance -	No controlled burning noted based on the records on the land clearing and felling for the replanting at sampled estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Yes
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	Noted based on the records on the land clearing and felling for the replanting at sampled estates, method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction	Yes
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	Standard Operating Procedures were available for Pasir Panjang POM & its Supply Bases. Among the SOP's that were sampled were: Kulim Plantations (M) Berhad 1. Transparency; Doc No: SQD/SMS/1.0; Doc Date 01/08/2020 2. Core labour Standard; Doc No: SQD/SMS/4.0; Doc Date: 01.08.2020	Yes

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Criterion / Indicator		Assessment Findings	Compliance
		<p>3. Waste Management; Doc No: SQD/SMS/6.2; Doc Date: 01.08.2020.</p> <p>4. Agrochemicals Management; Doc No: SQD/SMS/6.1; Doc Date: 01.08.2020</p> <p>5. Immature/ Mature Area – Rat Baiting; Doc No: LR-SOP-W07</p> <p>6. Grievance; Doc No: SQD/SMS/4.1; Doc Date: 01.08.2020</p> <p>7. Traceability; Doc No: SQD/SMS/1.2; Doc Date: 01.08.2020</p> <p>8. Consultation and Communication; Doc No: SQD/SMS/1.1; Doc Date: 01.08.2020</p> <p>Regular Internal Audits are conducted to ensure all SOP's are implemented. Internal Audits were conducted as below for the estates: Tunjuk Laut Estate: 5/10/2020</p> <p>Plantation Inspectorate Visit is done twice in a year to inspect the estates performance in line with the SOPs that are in place. Verified the PI Visit as below: Tunjuk laut Estate: 23/9/2020 (SS/LTL/2/2020) Pasir Panjang Estate: 19/8/2020 (SS/LPP/2/2020)</p>	
4.6.1.2	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.	Where planting is on slope, construction of terraces was in accordance to guidance in the Agricultural Manual. The guidance for planting on slope is as follows:-	Yes

Criterion / Indicator		Assessment Findings			Compliance
	- Major compliance -	Slope (°)	Terrace width (m)	<p>Areas with greater than 25-degree slope are not to be planted but be left for biodiversity purposes. Among the soil conservation measures implemented to prevent soil erosion and siltation were construction of terrace, planting of cover crop and construction of road side drains. Planting terraces had been constructed where slope >10°. Field inspection showed groundcover with soft grass and soft weeds at all estates.</p>	
		<2°	Straight Planting		
		2 – 5°	Straight planting. Water Conservation terraces at 32m interval		
		6 – 15°	5.00		
		16 – 25°	3.60		
4.6.1.3	<p>A visual identification or reference system shall be established for each field.</p> <p>- Major compliance -</p>	<p>Due to the ongoing Covid 19 Pandemic, onsite assessment was unable to be conducted and a remote assessment audit was conducted instead. Therefore, the fields were unable to be physically visited. Nevertheless, the management has provided photo evidence of Fields Identification which clearly states the Field Number and Hectarage.</p>			Yes
Criterion 4.6.2: Economic and financial viability plan					
4.6.2.1	<p>A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.</p> <p>- Major compliance -</p>	<p>The estates had documented annual business plan (budgets) for 2020 and projections up to 2025. The business plans were prepared as guidance for future planning. The budget contains monthly budget per operating units including FFB, CPO and PK. Component of operating expenditure includes Administration, harvesting & collection, field upkeep, transportation,</p>			Yes

Criterion / Indicator		Assessment Findings	Compliance								
		<p>road and bridges, labour overhead, EVIT (running accounts for engines, vehicles, implements & tractors.</p> <p>Inclusive in the business plan is also Capital Expenditure (CAPEX) includes building-general, tractors and agricultural implement, office equipment and others as per the annual budget for 2020 for estates sighted and verified.</p>									
4.6.2.2	<p>Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years.</p> <p>- Major compliance -</p>	<p>The annual replanting programme available under budget for 5 years and forecast. As per budget verification, replanting programmed as per below:-</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>P.Panjang</td> <td>No replanting until year 2036 at Field P11</td> </tr> <tr> <td>Tunjuk Laut</td> <td>No replanting until year 2031 for Field P06</td> </tr> <tr> <td>Bkt Payung</td> <td>No replanting until year 2036 at Field P11</td> </tr> </tbody> </table>	Estate	Remarks	P.Panjang	No replanting until year 2036 at Field P11	Tunjuk Laut	No replanting until year 2031 for Field P06	Bkt Payung	No replanting until year 2036 at Field P11	Yes
Estate	Remarks										
P.Panjang	No replanting until year 2036 at Field P11										
Tunjuk Laut	No replanting until year 2031 for Field P06										
Bkt Payung	No replanting until year 2036 at Field P11										
4.6.2.3	<p>The business or management plan may contain:</p> <ul style="list-style-type: none"> a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production : cost per tonne of FFB d) Price forecast 	<p>Annual business plan in the form of annual budget and the projection for 3 years prepared as guidance for future planning. The business plan contains FFB yield, CPO, OER and KER, costs of production, etc</p>	Yes								

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Criterion / Indicator		Assessment Findings	Compliance
	e) e) Financial indicators : cost benefit, discounted cash flow, return on investment - Major compliance -		
4.6.2.4	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. - Major compliance -	The management plan was effectively implemented, and achievements of the goals and objectives regularly monitored, periodically reviewed and documented by performance monitoring. The estates' performance was recorded in the monthly progress reports. Details on the actual vs budget i.e crop production, fixed and direct cost are shown therein. The management also provides variance report on the performance and reviewed monthly. Implementation verification can referred as per Plantation Inspectorate report SS/LTL/2/2020 dated 23/9/2020.	Yes
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	The payment shall be made within thirty days from the date of certification of the submitted invoices as per the Memorandum of Agreement signed by the contractors.	Yes
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Sampled of the payment records for contractors as below: i. INV# I-202009C0012 dated 30/09/2020; Payment Voucher No.: 20000470 dated 04/10/2020 ii. Invoice dated 30/10/2020; Payment Voucher No.: 20000139 dated 06/11/2020 iii. INV# 2090 dated 30/10/2020; Payment Voucher No.: 20000137 dated 06/11/2020 iv. INV# 00078 dated 30/10/2020; Payment Voucher No.: 20000100 dated 08/11/2020	Yes

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Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.6.4: Contractor			
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	The contractors have acknowledged on the terms and conditions for complying with all RSPO, ISCC, MSPO requirements related to the execution of the contract. The contractors have been briefed on the MSPO requirements prior to work. The contractors were briefed during the stakeholder meeting conducted on 07/10/2020.	Yes
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Estates' Management has engaged contractors for varieties of works such as harvesting and maintenance work. Sampled of the letter of acceptance/ agreement as below: <ul style="list-style-type: none"> i. Contract No.: MPSB/LPP 6/2015 for harvesting of FFB in field P12 at Pasir Panjang Estate which valid to 31/07/2021. ii. Ref. No.: MPSB/C1/10/20 for harvesting FFB in Tunjuk Laut Estate which valid from 01/09/2019 to 31/12/2022. iii. Ref. No.: MPSB/C1/9/7/2015 for loading and transporting FFB from ramp of Tunjuk Laut Estate to mill which valid until 31/12/2020. iv. Contract No.: MPSB/LBP 3/2015 for loading and transporting FFB which extended to 31/12/2020. 	Yes
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	The contractors have acknowledged that they are subject to any certification audit assessment through a physical inspection if required when agreement was signed.	Yes
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted.	The contractors engaged by the estates' management has acknowledged the agreement where they need to follow the RSPO, ISCC, MSPO requirements.	Yes

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.7 Principle 7: Development of new planting			
Criterion 4.7.1: High biodiversity value			
4.7.1.1	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation. - Major compliance -	There is no development of new planting at all visited estates.	Yes
4.7.1.2	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia's National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required. - Major compliance -	There is no development of new planting at all visited estates.	Yes
Criterion 4.7.2: Peat Land			
4.7.2.1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - Major compliance -	There is no development of new planting at all visited estates.	Yes

Criterion / Indicator	Assessment Findings	Compliance
Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)		
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. - Major compliance -	There is no development of new planting at all visited estates. Yes
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. - Major compliance -	There is no development of new planting at all visited estates. Yes
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. - Major compliance -	There is no development of new planting at all visited estates. Yes
4.7.3.4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. - Minor compliance -	There is no development of new planting at all visited estates. Yes
Criterion 4.7.4: Soil and topographic information		

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Criterion / Indicator		Assessment Findings	Compliance
4.7.4.1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. - Major compliance -	There is no development of new planting at all visited estates.	Yes
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - Major compliance -	There is no development of new planting at all visited estates.	Yes
Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils			
4.7.5.1	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - Major compliance -	There is no development of new planting at all visited estates.	Yes
4.7.5.2	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. - Major compliance -	There is no development of new planting at all visited estates.	Yes
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	There is no development of new planting at all visited estates.	Yes

Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.7.6: Customary land			
4.7.6.1	No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. - Major compliance -	There is no development of new planting at all visited estates.	Yes
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	There is no development of new planting at all visited estates.	Yes
4.7.6.3	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. - Major compliance -	There is no development of new planting at all visited estates.	Yes
4.7.6.4	The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement. - Major compliance -	There is no development of new planting at all visited estates.	Yes

Criterion / Indicator		Assessment Findings	Compliance
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	There is no development of new planting at all visited estates.	Yes
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. - Major compliance -	There is no development of new planting at all visited estates.	Yes
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance -	There is no development of new planting at all visited estates.	Yes
4.7.6.8	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. - Minor compliance -	There is no development of new planting at all visited estates.	Yes

MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mill

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	Policy for the implementation of MSPO shall be established. - Major compliance -	Kulim (Malaysia) Berhad has established Malaysian Sustainable Palm Oil Policy dated 1/05/2018 for Bahasa Malaysia and 30/11/2019 for English version signed by Executive Director. The company is committed to implement all Principles and Criteria set out by the MSPO.	Yes
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - Major compliance -	The company is committed to implement all Principles and Criteria of MSPO. KULIM will make every effort to achieve the balance between people, planet and profit in all management decisions and operations through continual program. The policy has been communicated to the workers on 23/10/2019 in mill and relevant stakeholders during the stakeholder meeting conducted on 07/10/2020.	Yes
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	An integrated internal audit for RSPO/ MSPO/ ISCC was planned to carry out on 06/09/2020 – 02/10/2020 for all estates and mills in Kulim (M) Berhad by Sustainability team. The audit schedule for Pasir Panjang POM was on 17/09/2020. Seen the RSPO, ISCC & MSPO List of Documentation Audit where it has covered all the principles and criteria of MSPO. There were two non-conformances raised or MSPO in the mill.	Yes

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<p>4.1.2.2</p>	<p>The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.</p> <p>- Major compliance -</p>	<p>KULIM (Malaysia) Berhad has developed Internal Audit Procedure with Doc. No.: SQD/SMS/3.2 dated 01/08/2020. The aim of the procedure is to ensure that the implementation of the company’s RSPO, ISCC and MSPO management system is in line with the defined policies, procedures and other requirements. The frequency of the audit to be carried out is at least once within 12 months (before expiry of the certificate).</p> <p>The result of internal audit was recorded in the Non-Conformance Report (NCR) form. There were two non-conformances raised or MSPO in Pasir Panjang POM. Corrective Action Plan dated 21/09/2020 was developed with root cause identified, immediate action and preventive action.</p>	<p>Yes</p>
<p>4.1.2.3</p>	<p>Reports shall be made available to the management for their review.</p> <p>- Major compliance -</p>	<p>The Non-Conformance Report and RSPO, ISCC & MSPO List of Documentation Audit was distributed to the estate after the audit was completed and the Estate Manager has acknowledged on the report.</p>	<p>Yes</p>
<p>Criterion 4.1.3 – Management Review</p>			
<p>4.1.3.1</p>	<p>The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.</p> <p>- Major compliance -</p>	<p>The management has carried out Management Review Meeting for RSPO/ MSPO 01/2020 on 11/11/2020. Seen the meeting minutes with the following agendas discussed during the meeting:</p> <ul style="list-style-type: none"> i. Follow up actions from management review ii. Audits result (Internal & External) iii. Review of company policies and latest changes iv. Traceability v. Performance of operation vi. Status of corrective and preventive action vii. Customer feedback viii. Continual improvement plan ix. Complaint & Grievances 	<p>Yes</p>

		x. Other matters	
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. - Major compliance -	The mill management has established and implemented a continual improvement plan dated 22/10/2020 as below: i. OSHA ii. Social iii. Environmental Environmental Risk Assessment and sighted management established continual improvement for all impact.	Yes
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. - Major compliance -	Pasir Panjang POM has implemented new technology for cost saving initiate. They implemented the conversion of desludging method from conventional method to online desludging method.	Yes
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms. - Major compliance -	KULIM (M) Berhad has developed Transparency Procedure with Doc. No.: SQD/SMS/1.0 dated 1/08/2020 where operating units to provide adequate information when requested by stakeholders on sustainability, social and legal issues when appropriate. Briefing of the adequate information was conducted on 07/10/2020 to all the stakeholders during stakeholder meeting.	Yes

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<p>4.2.1.2</p>	<p>The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p>Pasir Panjang POM has implemented Enquiry Register Record to record any requests from stakeholders. The requests are normally from authority to visit the mill.</p> <p>The documents may be publicly available are listed in the Transparency Procedure such as:</p> <ul style="list-style-type: none"> i. Land tilte/ user rights ii. OSH plan iii. Plans and impact assessment relating to environmental and social impacts iv. HCV documentation v. Pollution prevention and reduction plans vi. Complaint and grievances details vii. Human Rights policy viii. Procedure for negotiation on compensation ix. Results of FPIC processes x. HCS documentation xi. Continuous Improvement Plan xii. And etc <p>Besides, the stakeholders could access to company's website, http://www.kulim.com.my/ to get the information such as annual report.</p>	<p>Yes</p>
<p>Criterion 4.2.2 – Transparent method of communication and consultation</p>			
<p>4.2.2.1</p>	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p>	<p>KULIM (M) Berhad has established Consultation and Communication Procedure with Doc. No.: SQD/SMS/1.1 dated 1/08/2020 to ensure KULIM has an open and transparent communication methods with local communities and other internal & external stakeholders. Modes of the communication are such as muster, meetings, campaigns,</p>	<p>Yes</p>

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		suggestion boxes, letter, email, social media, face to face communication and etc.	
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . - Minor compliance -	Mill Manager has appointed the Assistant Mill Engineer as Social Person In-Charge and seen the appointment letter dated 01/03/2019. His role is to handle any social issues reported by workers and stakeholders.	Yes
4.2.2.3	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. - Major compliance -	Pasir Panjang POM has developed List of Stakeholders 2020 which last updated on 20/11/2020. The stakeholder list has included categories such as government authorities, NGO, neighbouring schools, contractors and suppliers. Stakeholder meeting was conducted on 07/10/2020 for whole Tunjuk Laut Complex (comprises of Pasir Panjang POM, Pasir Panjang Estate, Bukit Payung Estate and Tunjuk Laut Estate) that involved the participation of affected parties such as local communities, government authorities, contractors, neighboring plantations and etc. Issues raised during the meeting was responded by the management on the spot. Meeting minutes was sighted with recorded all the issues and responses. Stakeholder meeting materials were reviewed.	Yes
Criterion 4.2.3 – Traceability			
4.2.3.1	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. - Major compliance -	Traceability SOP; Sustainable Management System; Traceability; Doc: No: SQD/SMS/1.2; Date: 01.08.2020; Issue No: 01; Revision No: 05 was available and verified. The SOP outlines the preparations, receive and dispatch of FFB, CPO, Kernel and other by products at Kulim’s mill, job assignments and recordings of transport productivity for payment purpose and statistics.	Yes
4.2.3.2	The management shall conduct regular inspections on	Inspection on compliance with the traceability procedure is regularly checked through supply chain internal audit. The internal audit report,	Yes

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	<p>compliance with the established traceability system.</p> <p>- Major compliance -</p>	<p>which was carried out together with other schemes such as RSPO and ISCC, was available for verification.</p> <p>The Plant and Machinery Inspection is done by the Mill Inspector (MJAB) to inspect on compliance with the traceability standards. The most recent inspection report referred MJAB/PPPOM/4/2020 was conducted on 27/10/2020. The inspection report was available for verification.</p>	
4.2.3.3	<p>The management shall identified and assign suitable employees to implement and maintain traceability system.</p> <p>- Minor compliance -</p>	<p>The person appointed for Traceability is GM/Senior Manager/Manager/Deputy Manager/Assistant in-charge/Acting Manager or Respective Operating Units as per appointment letter dated 21.09.2020, ref: SQD/ADMIN/026/20.</p>	Yes
4.2.3.4	<p>Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.</p> <p>- Major compliance -</p>	<p>Records of CPO and PK storage, sales, deliver were maintained at Pasir Panjang POM.</p> <p>Example of records evidence are as below: 1. Despatch summary report by buyer (daily/monthly) 2. Despatch records (Weighbridge Tickets)</p>	Yes
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	<p>All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p>	<p>The Pasir Panjang Palm Oil Mill continued its commitment to comply with applicable legal requirements. Among the licenses and permits verified were: 1. MPOB License; License Number: 59232004000; License Valid from: 30/1/2020 till 31/12/2020.</p>	Yes

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		<ol style="list-style-type: none"> 2. DOE Compliance Schedule; License Number: 004649; License Valid from 01.07.2020 till 30.06.2021 3. Fire Certificate (Form II); License Number: JBPM: JH/7/216/2019; Already in progress to renew. Bomba already conducted inspection for renewal on 25/11/2020 as per letter JBPM/JH/BKK 700-3/1/7/0311. 4. Diesel Permit; Reference Number: KPDNKK.J.KTG/PERMIT0028(PD)(R); Maximum Capacity: 20, 000 litres valid until 14/12/2020. 5. Energy Commission License; License Number: 2020/01566; Serial Number: 44569; Valid from 6/7/2020 till 5/7/2021; Installation Capacity: 1600.55 kilowatt 6. Ref. No.: TK(NJ)U-21 dated 31/03/2019 for <i>Skim Khairat Keluarga</i> for not more than RM 37.50 per worker 7. Ref. No.: TK(NJ)U-21 dated 31/03/2019 for sport club fee of not more than RM 10 per worker 	
<p>4.3.1.2</p>	<p>The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>Documented procedures have been established and implemented; refer to:</p> <ol style="list-style-type: none"> 1. Prosedur Pematuhan Keperluan Undang-Undang; YPJ Plantations Sdn Bhd; Doc Number: YPJP-SOP-77; Version 1.0; Effective Date: 25.10.2020 2. Compliance to Legal Requirement; Kulim (Malaysia) Berhad; Doc No: SQD/SMS/2.0; Doc Date: 01.08.2020; Issue No: 01. <p>A list of all relevant laws related to the legal requirements were available and maintained at the mill. The list was last updated on 17.11.2020.</p>	<p>Yes</p>

<p>4.3.1.3</p>	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>All legal requirement was documented in Legal and Other Requirement Register. Compliance to each applicable law and regulation is monitored by the mill. The legal register at the mill were reviewed/updated on a yearly basis / as and when needed for new updates/licenses. The latest review was conducted on 8.11.2020. Sighted the document 'Summary of Compliance' available at the mill undersigned by the Top Management. The document lists the latest applicable laws and amendments, revision dates and acknowledgement by the management.</p> <ol style="list-style-type: none"> 1. All the legal and other requirements were registered accordingly and documented in the legal requirement register including new updates for: 2. Fees (Employment Pass, Visit Pass (Temporary Employment) and Work Pass (Remission of Fees) Order 2020. 3. Prevention and Control of Infectious Diseases (Compounding of Offences) (Amendment) (No.6) Regulations 2020. 4. Minimum Wages Order 2020 <p>Employment Provident Fund (Amendment) Rules 2020.</p>	<p>Yes</p>
<p>4.3.1.4</p>	<p>The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	<p>Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office.</p> <p>Pasir Panjang Mill has appointed Pn Norazimah Abas (Executive regional Controller) as the person in charge to monitor the changes and updates on legal requirements that are relevant to the mill operations. Verified the appointment letter dated 27.06.2018.</p>	<p>Yes</p>
<p>Criterion 4.3.2 – Lands use rights</p>			

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<p>4.3.2.1</p>	<p>The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.</p> <p>- Major compliance -</p>	<p>Pasir Panjang POM is located under the land of Pasir Panjang Estate. A copy of land title was kept in the mill. The land is belongs to Johor Corporation by verified the land title.</p>	<p>Yes</p>
<p>4.3.2.2</p>	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land.</p> <p>- Major compliance -</p>	<p>Pasir Panjang POM is located under the land of Pasir Panjang Estate. A copy of land title was kept in the mill. The land is belongs to Johor Corporation by verified the land title.</p>	<p>Yes</p>
<p>4.3.2.3</p>	<p>Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p> <p>- Major compliance -</p>	<p>Legal parameter for mill builds up with fencing available and verified the mill's map to show the boundary.</p>	<p>Yes</p>
<p>4.3.2.4</p>	<p>Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC).</p> <p>- Minor compliance -</p>	<p>Pasir Panjang POM is located under the land of Pasir Panjang Estate. A copy of land title was kept in the mill. The land is belongs to Johor Corporation by verified the land title.</p>	<p>Yes</p>
<p>Criterion 4.3.3 – Customary rights</p>			
<p>4.3.3.1</p>	<p>Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.</p> <p>- Major compliance -</p>	<p>Pasir Panjang POM is located under the land of Pasir Panjang Estate. A copy of land title was kept in the mill. The land is belongs to Johor Corporation by verified the land title. There were no customary rights of land in the compound.</p>	<p>Yes</p>

<p>4.3.3.2</p>	<p>Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -</p>	<p>Pasir Panjang POM is located under the land of Pasir Panjang Estate. A copy of land title was kept in the mill. The land is belongs to Johor Corporation by verified the land title. There were no customary rights of land in the compound.</p>	<p>Yes</p>
<p>4.3.3.3</p>	<p>Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -</p>	<p>Pasir Panjang POM is located under the land of Pasir Panjang Estate. A copy of land title was kept in the mill. The land is belongs to Johor Corporation by verified the land title. There were no customary rights of land in the compound.</p>	<p>Yes</p>
<p>4.4 Principle 4: Social responsibility, health, safety and employment condition</p>			
<p>Criterion 4.4.1: Social Impact Assessment (SIA)</p>			
<p>4.4.1.1</p>	<p>Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -</p>	<p>Sustainability & Quality Department has carried out the SIA audit during the internal audit on 17/09/2020. The assessment has involved participation of internal workers, neighbouring school's representative and shop's owner. Checklist Interview was utilized during interview with the contractor for SIA. The social impact register is developed based on the scoring of frequency, consequence and likelihood. Social Management Plan will be developed after the social impact register established. The last review of the social management plan was on 15/10/2020 with identification of negative and positive impacts. Mitigation and promotion actions were taken accordingly to the impacts identified. For eg: Understanding of Lock Out, Tag Out system implemented in the mill is low by the workers. The management has conducted the internal briefing on 17/01/2020 to all the workers and 20/02/2020 by external. Seen the records of training.</p>	<p>Yes</p>
<p>Criterion 4.4.2: Complaints and grievances</p>			
<p>4.4.2.1</p>	<p>A system for dealing with complaints and grievances shall be established and documented.</p>	<p>KULIM (M) Berhad has developed Grievance Procedure with Doc. No.: SQD/SMS/4.1 dated 01/08/2020 to ensure KULIM has a documented system for dealing with complaints and grievances that is agreeable to</p>	<p>Yes</p>

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	- Major compliance -	all sides and accepted by all stakeholders. Dispute resolution mechanisms are established through open and consensual agreements with affected parties. Procedure has outlined the process of complaint management. The timeline to resolve the grievances is clearly stated in the procedure which is within 26 days for internal employees and 21 days for other stakeholders.	
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - Major compliance -	The mill has implemented Complaint Book for housing repair and Enquiry Register Book to record any complaint and grievances from internal and external stakeholders. Sampled the complaints as below: i. House No.: 92 dated 26/08/2020 Issue: Broken door at the back and lighting malfunction. Action: The management has instructed the carpenter to carry out the repair work on 30/08/2020 and the complainant has acknowledged after issue resolved. Seen the photo evident of the repaired door as well.	Yes
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - Minor compliance -	Complaint Box was available in front of the office as verified through the photos.	Yes
4.4.2.4	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. - Minor compliance -	Complaint Box was available in front of the office as verified through the photos. Besides, a briefing on the complaint procedure to the workers was conducted on 06/09/2020. The stakeholders were briefed during the stakeholder meeting conducted on 07/10/2020.	Yes
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. - Major compliance -	Complaint records from March 2018 were maintained.	Yes

Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	<p>Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.</p> <p>- Minor compliance -</p>	<p>The mill management has made contribution to the local communities by providing job opportunity to the local. Besides, they will make donation upon request from the stakeholders. For eg: SK Tunjuk Laut has requested for soil for planting activity in the school on 25/08/2020. The management has made donation to the school and Payment Number# 20000020 dated 31/08/2020 was sighted.</p>	Yes
Criterion 4.4.4: Employees safety and health			
4.4.4.1	<p>An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>Kulim Plantation has established the Occupational Health and Safety Policy signed by the Executive Director on 01.05.2018. The policy has been communicated to the workers through induction training for new workers and morning briefing.</p> <p>The Sustainability Team is also committed in establishing various working standards through procedures or pictorial method to improve safe working condition.</p> <p>The mill has established Safety and Health Management Plan and documented in Environment, Safety and Health Plan FY 2020. The management plan includes the ESH risk management, Emergency Response Procedure, Chemical Safety Management, Noise Boundary Monitoring, Health monitoring.</p> <p>The OSH Policy have been effectively communicated to all Mill workers and staffs on 23/10/2020</p>	Yes
4.4.4.2	<p>The occupational safety and health plan should cover the following:</p>	<p>a) Kulim Plantation has established the Occupational Health and Safety Policy signed by the Executive Director on 01.05.2018. The policy has been communicated to the workers through induction training for new workers and morning briefing. The OHS Policy</p>	Yes

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<p>a) A safety and health policy, which is communicated and implemented.</p> <p>b) The risk of all operations shall be assessed and documented.</p> <p>c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill:</p> <ul style="list-style-type: none"> i. All employees involved are adequately trained on safe working practices; ii. All precautions attached to products should be properly observed and applied; <p>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such</p>	<p>have been effectively communicated to all Mill workers and staffs on 23/10/2020.</p> <p>b) HIRARC was used to assess risks associated to all work units in the mill. The HIRARC is reviewed on a yearly basis and as and when there occur any accidents in the mill. The latest review was done due to the recent accident that involved the Sterilizer work station. Also sighted HIRARC for Covid 19, sterilizer, kernel plant, ramp station, boiler station and workshop.</p> <p>CHRA Report (Report No: CEM/1608/001) was available and verified. The CHRA was conducted by Kulil Safety Training Sdn Bhd on July 2016</p> <p>Noise Risk Assessment was conducted by Dr. Syed Abdul Hamid B. Syed Hassan (Dosh Reg: JKPP HIE 127/5/3-1 (No.169) on 4/2/2020. The NRA Report (Report No: JKPP HIE 127/5/3-1 (No.169) – 2020/002) was available for verification.</p> <p>Audiometric Test was conducted for all workers in the mill on 03.11.2019. A total of 12 workers were categorized as having "hearing impairment". The workers were sent for retest on 03.02.2020. The JKPP 7 form has been submitted to JKPP to report on the incidences.</p> <p>c) The mill has established training program for employees exposed to chemicals used at the palm oil mill to ensure the continuous awareness to the employee. The training was conducted by the Manager, Asst. Manager and representative form the chemical suppliers to the supervisors and operators. Sighted the training records as follows:</p> <ul style="list-style-type: none"> • Chemical Handling Training – 18.08.2020 • Water Treatment Plant Training – 18.08.2020 	
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	<p>meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>d) The Mill has provided PPE based on the SOP and HIRARC that has been developed in the mill. All PPE are provided by the mill free of charge. The PPE issuance form was available for verification which indicated appropriate PPE's were provided to the workers on a regular basis.</p> <p>e) Pasir Panjang POM had established Work Instruction, SW/WI/23 for Handling of Chemicals and SW/WI/22 Waste Management to ensure proper and safe handling and storage, in accordance to OSH (Classification Packaging and Labelling) Regulation 1997, OSH (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000 and EQ (Scheduled Wastes) Regulations 2005.</p> <p>The organization has established Work Instructions for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification, Labelling and Safety Data Sheet Of Hazardous Chemicals) Regulation 2013 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) Mill Manager was appointed to be the Chairman of OHS Committee at the mill as per letter signed by the Chairman, Safety and Health Main Committee Kulim (M) Berhad, dated 22/9/2020. Mill management has appointed Safety Committee Member consist of OSH Coordinator, Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Mill Manager</p> <p>g) The mill management conducted OSH committee meeting on a</p>	
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		<p>quarterly basis and when necessary due to accidents that occur. The meeting discussed issues on employees' safety, health and welfare such as mill safety and health achievement report, mill security, safety compliance by contractors, workplace audit report, legal compliance, safety and health training. Sighted the latest OSH Meeting Minutes dated 27/9/2020 (03/2020).</p> <p>h) Accident and emergency procedures were available at the mill. Verified the Emergency Plans for Fire, Flood, Accidents and Spillage. The flowcharts for Emergency Plans were displayed at the noticeboards together with the emergency contacts. Fire extinguishers were available at the mill with monthly inspections done by the management to ensure the fire extinguishers are functional. An ERP training was conducted on 1 March 2020. Fire Drill Training was also conducted in the mill on 1/3/2020.</p> <p>i) A list of first aiders were available at the mill comprising of all main work stations. First Aid boxes were assigned to the respective first aiders. Monthly First Aid Box inspection was conducted by the Medical Assistant at the mill. The first aid kit holders are trained on a regular basis and with refresher trainings. The latest training was conducted on 6/10/2020. CPR and First Aid Training was conducted by Malaysian Red Crescent Society for all First Aiders of the mill.</p> <p>j) Records of accidents were maintained by the Mill management and was available for verification. There was 8 accident case reported for the year 2019. 8 workers were diagnosed with hearing impairment based on the audiometric test results. The JKKP 7 form was reported to JKKP dated 18/3/2020 and the report was available for verification. JKKP 8 form for the year ending 2019</p>	
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		was submitted to JKPP dated 28/1/2020 and the report available for verification also. There was 2 accident case reported for the year 2020 involving the Kernal plant station dated 16/10/2020 and 21/5/2020. The JKPP 6 form was submitted to JKPP accordingly with the report available for verification.	
Criterion 4.4.5: Employment conditions			
4.4.5.1	The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees. - Major compliance -	KULIM (Malaysia) Berhad has developed Sustainability Policy dated 01/10/2020 where the company respects, supports and upholds fundamental human rights and does not engage in any discrimination of race, religion and gender. Briefing of the policy was conducted on 18/10/2020 and 21/10/2020 to the workers and 07/10/2020 for stakeholders.	Yes
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - Major compliance -	KULIM (Malaysia) Berhad has established Core Labour Standard Policy dated 01/05/2018 where the company will not engage in nor support discrimination in any form. Briefing of the policy was conducted on 23/10/2019 to the workers and 07/10/2020 for stakeholders.	Yes
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance -	There were employment contracts for checkroll workers. Pay and conditions are documented and above the Minimum Wage Order 2020. Sampled of employment contracts confirmed that terms and conditions are clearly and have been signed by the worker. Sampled total 10 payslips found that the workers have achieved Minimum Wage Order 2020.	Yes
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the	Pasir Panjang POM has not engaged permanent contractors for work in the mill. Only project basis.	Yes

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	<p>employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p>		
4.4.5.5	<p>The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>Pasir Panjang POM has implemented I-Plantation System to record and maintain the overview of employees in Employee Master. Details such as full name, gender, date of birth, date of entry, job description and type of wages was found in the system.</p>	Yes
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>The employees that recruited by the mill are from local and foreign workers. They are all under direct employment to the mill. All of them have signed on the employment contract prior to work. Terms and conditions were according to MAPA/ NUPW Agreement. Sampled of employment contracts as below:</p> <ul style="list-style-type: none"> i. Employee No.: 640148 ii. Employee No.: 640181 iii. Employee No.: 640086 iv. Employee No.: 640194 v. Employee No.: 640189 	Yes
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.</p> <p>- Major compliance -</p>	<p>All the daily attendance was recorded by punch card system on daily basis and overtime was recorded in the Attendance Summary Mill.</p>	Yes
4.4.5.8	<p>The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.</p>	<p>Document reviewed on the punch card as well as payslip shown that the overtime payments are in accordance to law and workers are not forced to work overtimes.</p>	Yes

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	- Major compliance -		
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	Wages and overtime were paid according to the "punch card system". Total hours of overtime and daily attendance has recorded in Attendance Summary Mill. Sampled of payslip for March 2020, April 2020, June 2020 and August 2020 as below: i. Employee No.: 640148 ii. Employee No.: 640181 iii. Employee No.: 640086 iv. Employee No.: 640194 v. Employee No.: 640189 All of them above have achieved the Minimum Wage 2020.	Yes
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings. - Minor compliance -	The company provided free medical facilities to all the workers. Free water and electricity were supplied to all the workers. The company also provided free transportation to the hospital if needed.	Yes
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities. - Major compliance -	The workers were provided with free housing facilities, free water and electricity. Estate Hospital Assistant has carried out lineiste inspection on weekly basis. Any issues sighted during linesite inspection was recorded in the linesite inspection checklist with remarks and proposed action sighted.	Yes
4.4.5.12	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	KULIM (Malaysia) Berhad has developed Sexual Harassment Policy dated 01/05/2018 where the company seeks to eradicate all forms of sexual harassment in the workplace and wherever possible influence the behavior of its employees. KULIM has a zero tolerance on sexual harassment. Besides, the company has established Core Labour Standard Policy dated 01/05/2018 where the company recognized and respects the right of employees of their rights and freedoms relating	Yes

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		to reproduction and reproductive health. Briefing of the policy was conducted on 28/09/2020 to the workers and 07/10/2020 for stakeholders. A Women on Ward (WOW) committee was established in the mill and meeting was conducted on 05/11/2020. No issue was reported during the meeting. Briefing on the complaint procedure for WOW was done during the meeting.	
4.4.5.13	<p>The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>	<p>Kulim (Malaysia) Berhad has established Core Labour Standard Policy dated 1/05/2018 where the company recognized and respected the rights of employees to form and/ or join trade unions of their choice which are given due recognition by KULIM. The policy was in bi-lingual which is Bahasa Malaysia and English. Briefing of the policy was conducted on 23/10/2019 to the workers and 07/10/2020 for stakeholders.</p> <p>The last UNION meeting was carried out on 25/10/2020 with the representatives from employer, AMESU and NUPW. Issues reported during the meeting have recorded in the meeting minutes and action plan was developed. Action has been taken accordingly. For eg: the management has emailed to the estate's management immediately after the meeting on the issue of rubbish collection. Seen the email correspondence and the estate's management has monitored on the issue.</p>	Yes
4.4.5.14	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.</p> <p>- Major compliance -</p>	<p>KULIM (Malaysia) Berhad has established Core Labour Standard Policy dated 1/05/2018 where they are not engaged in or support the use of Child Labour and will provide adequate support to enable children of its employees to attend and remain in school until no longer a child. Besides, the company has developed Buku Panduan Anggota Pekerja Perladangan dated 1/9/2018 where the company comply with the Children and Young Persons Employment Act 1966. Briefing of the policy was conducted on 23/10/2019 to the workers and 07/10/2020</p>	Yes

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		for stakeholders. Document verified the master list of the workers confirmed that the minimum age of workers employed are above 18 years.																					
Criterion 4.4.6: Training and competency																							
4.4.6.1	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training. - Major compliance -	<p>The mill established a training program for all workers based on the training need analysis conducted on a yearly basis. Covid-19 training and briefings were sighted at the mill. Records of trainings were maintained by the estates as below: -</p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>ERP and Fire Drill Training</td> <td>1/3/2020</td> </tr> <tr> <td>First aid training</td> <td>6/10/2020</td> </tr> <tr> <td>Policy Training</td> <td>23/10/2020</td> </tr> <tr> <td>Scheduled waste Training</td> <td>23/1/2020</td> </tr> <tr> <td>Water treatment training</td> <td>12/7/2020</td> </tr> <tr> <td>Effluent tRaining</td> <td>16/1/2020</td> </tr> <tr> <td>Working at height training</td> <td>27/1/2020</td> </tr> <tr> <td>Safety work in engine room</td> <td>2/2/2020</td> </tr> <tr> <td>RSPO, MSPO and ISCC training</td> <td>1/1/2020</td> </tr> </tbody> </table>	Training	Date	ERP and Fire Drill Training	1/3/2020	First aid training	6/10/2020	Policy Training	23/10/2020	Scheduled waste Training	23/1/2020	Water treatment training	12/7/2020	Effluent tRaining	16/1/2020	Working at height training	27/1/2020	Safety work in engine room	2/2/2020	RSPO, MSPO and ISCC training	1/1/2020	Yes
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4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.	The mill has conducted training need analysis for all employees, management and contractors. The need analysis was conducted base on the job designation and training required by the job type. 40 trainings were deemed required for workers in the mill.	Yes																				

	- Major compliance -		
4.4.6.3	A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure. - Minor compliance -	The mill has a training program which is updated annually. Sighted the Annual Training Program for FY 2020. The establishment of the program is guided by its Training Procedure (PCPOM/SOP/7.8; Issue: 03; Dated: 01.02.2018).	Yes
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented. - Major compliance -	Kulim (M) Plantation has established an Environmental Policy signed by Executive Director, Mr. Zulkifly Zakariah dated 01.05.2018. The policy has been established, communicated to all employees, displayed at notice board and continuously implemented by the management. The policy has been recently communicated to the workers and staffs of the mill on 25.10.2020. The policy can also be found at: http://www.kulim.com.my/ourpolicy.aspx?p_Id=0&c_Id=2097	Yes
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations - Major compliance -	The mill has conducted aspect and impact analysis and documented in Environmental Impact Assessment. The analysis was reviewed on annually basis and as and when there are changes in the operations. Latest review was conducted on September 2020. Among the EIA verified were chemical mixing and storage, CPO Storage, FFB Receiving and Grading, Diesel Engine and Biogas & Polishing Plant among others.	Yes
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.	The mill has established environmental improvement plan and documented in Environmental Improvement Plan 2020/2021. Latest review was conducted on 30.09.2020. The plan consists of improvement plans as below among others:	Yes

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	<p>- Major compliance -</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Environmental Impact</th> <th style="width: 50%;">Improvements</th> </tr> </thead> <tbody> <tr> <td>Collapse of retention bund due to erosion</td> <td>To repair the bund, complete with RC piling.</td> </tr> <tr> <td rowspan="2">Discharge of effluent into furrows over 100ppm BOD (license Limit)</td> <td>To upgrade ETP with biogas Reactor and Polishing Plant</td> </tr> <tr> <td>To install sludge dewatering system for online desludging. This will improve the effluent retention time.</td> </tr> <tr> <td>Scheduled Waste Management</td> <td>To conduct refresher training on scheduled waste.</td> </tr> </tbody> </table> <p>The monitoring was done based on DOE requirement such as Online Environmental Report was done periodically. Latest report was on 11/10/2020 for July, August and September 2020. Based on the reporting this report included water consumption, POME analysis etc. Report was available for review.</p>	Environmental Impact	Improvements	Collapse of retention bund due to erosion	To repair the bund, complete with RC piling.	Discharge of effluent into furrows over 100ppm BOD (license Limit)	To upgrade ETP with biogas Reactor and Polishing Plant	To install sludge dewatering system for online desludging. This will improve the effluent retention time.	Scheduled Waste Management	To conduct refresher training on scheduled waste.	
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	To install sludge dewatering system for online desludging. This will improve the effluent retention time.											
Scheduled Waste Management	To conduct refresher training on scheduled waste.											
<p>4.5.1.4</p>	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p>- Minor compliance -</p>	<p>The program to promote the positive impacts were documented in several management plans such as environmental management plan, energy management plan, pollution and emission management plan, water management plan and waste management plan.</p>	<p style="text-align: center;">Yes</p>									
<p>4.5.1.5</p>	<p>An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives.</p> <p>- Major compliance -</p>	<p>The mill continues provided training to ensure the awareness regarding the environmental policy among the employee. The mill management has established annual training program which covers the environmental awareness and compliance related trainings to the executives, staffs and workers.</p> <p>Sighted the training on environmental aspect as follows:</p>	<p style="text-align: center;">Yes</p>									

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		<ul style="list-style-type: none"> Environmental Policy Training – 17/3/2020 Scheduled Waste Training – 23/1/2020 																
4.5.1.6	<p>The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.</p> <p>- Major compliance -</p>	<p>The establishment of EPMC @ Environmental Performance Monitoring Committee (operation level – mill) and ERCMC @ Environmental Regulatory Compliance Monitoring Committee (HQ level) shows the commitment towards continuous compliance.</p> <p>The Environmental Performance Monitoring Committee (EPMC) is setup to comply with the DOE requirement on Guidance Self-Regulation (GSR).</p> <p>The 14th Environmental Regulatory Compliance Monitoring Committee (ERCMC) carried out on 18 August 2020 planned on quarterly basis.</p> <p>For EPMC, the latest EPMC meeting (01/2020) conducted on 13/7/2020. The meeting is to review environmental performance within Kulim’s Group POM.</p>	Yes															
Criterion 4.5.2: Efficiency of energy use and use of renewable energy																		
4.5.2.1	<p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period</p> <p>- Major compliance -</p>	<p>The Mill maintains records of energy usage, which is reported monthly to head office. The use of the steam turbine for electricity generation has been optimized in order to reduce the dependence on diesel fossil fuel. The monitoring of non-renewable energy usage was conducted on monthly basis. Sighted the sampled monitoring records for diesel usage for FY 2020 as follows:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Diesel (L)</th> <th>Diesel/FFB (L/Mt)</th> </tr> </thead> <tbody> <tr> <td>Jan 2020</td> <td>6845</td> <td>0.38</td> </tr> <tr> <td>Feb 2020</td> <td>4109</td> <td>0.23</td> </tr> <tr> <td>Mar 2020</td> <td>3548</td> <td>0.18</td> </tr> <tr> <td>Apr 2020</td> <td>7552</td> <td>0.28</td> </tr> </tbody> </table>	Month	Diesel (L)	Diesel/FFB (L/Mt)	Jan 2020	6845	0.38	Feb 2020	4109	0.23	Mar 2020	3548	0.18	Apr 2020	7552	0.28	Yes
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		<table border="1"> <tr> <td>May 2020</td> <td>10757</td> <td>0.46</td> </tr> <tr> <td>Jun 2020</td> <td>10032</td> <td>0.36</td> </tr> <tr> <td>Jul 2020</td> <td>6455</td> <td>0.23</td> </tr> <tr> <td>Aug 2020</td> <td>7937</td> <td>0.28</td> </tr> <tr> <td>Sept 2020</td> <td>16755</td> <td>0.58</td> </tr> <tr> <td>Oct 2020</td> <td>5839</td> <td>0.25</td> </tr> </table>	May 2020	10757	0.46	Jun 2020	10032	0.36	Jul 2020	6455	0.23	Aug 2020	7937	0.28	Sept 2020	16755	0.58	Oct 2020	5839	0.25	
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4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. - Major compliance -	The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate yearly budgets.	Yes																		
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	<p>Renewable energy used is from biofuel (shell and fiber) for boiler start-up. The mill monitors the usage of these energy source and the records were maintained and available for verification. The records are as below:</p> <table border="1"> <tr> <td>Year</td> <td>2020</td> </tr> <tr> <td>Fiber (mt)</td> <td>32,960.40</td> </tr> <tr> <td>Shell</td> <td>9869.03</td> </tr> </table> <p>* Records for Year 2020 is from Jan 2020 till Oct 2020.</p>	Year	2020	Fiber (mt)	32,960.40	Shell	9869.03	OFI												
Year	2020																				
Fiber (mt)	32,960.40																				
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Criterion 4.5.3: Waste management and disposal																					
4.5.3.1	All waste products and sources of pollution shall be identified	The identification of wastes products and sources of pollution were documented in EAI and also DOE's SW Second Schedule. In general,	Yes																		

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	and documented. - Major compliance -	among the wastes identified were domestic wastes, recyclable wastes, scheduled wastes and sewerage waste water.	
4.5.3.2	A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for: a) Identifying and monitoring sources of waste and pollution. b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products. - Major compliance -	The mill has established Waste management Plan based on the identification and source of pollutions and documented in Waste Management Action Plan 2020. The action plans have been developed to ensure they comply to the legal requirements and to improve efficiency and potential recycling of byproducts wherever possible.	Yes
4.5.3.3	The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005 - Major compliance -	The procedures for handling used chemicals classified under Environment Quality Regulation (Scheduled Waste) 2005, Environmental Quality Act, 1974 are available in the Work Instruction; Scheduled Waste; Document Number: SPO/WI/06; Doc Date: 01.10.2020. Verification of consignment notes showed that the mill disposed their scheduled wastes such as spent oil and spent lab chemical through licensed schedule waste managers. Verified the latest consignment note as below: a) SW 305: Spent lubricating oil; • Consignment Number: 2020071516XIZCT8 • Name of Contractor: Kuality Alam Sdn Bhd • Quantity: 0.05 mt • Date of disposal: 15/7/2020	Yes
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.	Domestic wastes from the mill were buried in a designated landfill in the oil palm estate. Based on SOP, no toxic wastes such as spent lubricants, empty chemical containers, used lab chemical, etc. were	Yes

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	- Minor compliance -	permitted to be disposed in the rubbish pit. The location of the landfill was also far from residential area and water ways based on the estate map provided. The weekly domestic waste disposal records were available and verified.			
Criterion 4.5.4: Reduction of pollution and emission					
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	An assessment for all polluting activities were done and available in the Pollution and Emission Management Plan. Verified the Stack Emission Assessment done at the boiler with the report details available as below: Air Emission Monitoring Report (Stack Emission) - Boiler No.2 <ul style="list-style-type: none"> • Report Ref. No: PAC-AE-200613 • Date of Monitoring: 26th June 2020 • Particulate Matter: (Limit 150 mg/m³, dry @ 12% CO₂) Results – 94 mg/m³, dry @ 12% CO₂ • Carbon Monoxide: (Limit 1000 mg/m³, dry @ 12% CO₂) Results – 897 mg/m³, dry @ 12% CO₂ The emission of all parameters tested were complied with their respective limits as stipulated in the Environmental Quality (Clean Air) Regulations 2014 except for carbon monoxide (CO ₂) parameter.	Yes		
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	The management have developed the Pollution and Emission Management Plan 2020. The action plan based on the management plan are as below: <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Pollution & Emission</td> <td style="width: 50%;">Action Plan</td> </tr> </table>	Pollution & Emission	Action Plan	Yes
Pollution & Emission	Action Plan				

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		Emission of Dark Smoke	Mill Stack - Installation of air pollution device		
			Inspection of Vehicle Conditions		
		Emission of Noise	Boundary parameter noise mapping data keeping		
			Routine maintenance to be carried out as per schedule - Running of vehicles - Diesel Engine		
		Emission of dust/ ashes particles	Shredded EFB Process - Routine maintenance to be carried out as per schedule		
			Boiler Ash -Placed in an area far from water source to prevent water pollution		
		GHG Emission	Fossil Fuel – Inspection of vehicle condition		
			POME - Methane captured and biogas generation - Palm Kernel shell sold to external – credit for mill emission.		
4.5.4.3	Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant		The POME is treated with open anaerobic, aerobic and stabilization lagoon. Monthly monitoring on the final discharge is conducted. The		Yes

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	<p>Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p>- Major compliance -</p>	<p>effluent at the final discharge is tested to ensure it compliance to the DOE License discharge limits. The permitted limit for BOD of the effluent final discharge is 1,000 ppm. Based on the mill's four latest quarterly report, the BOD results were never exceeding the regulated limit.</p>	
Criterion 4.5.5: Natural water resources			
<p>4.5.5.1</p>	<p>The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> a) Assessment of water usage and sources. b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities. c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). <p>- Major compliance -</p>	<p>Pasir Panjang POM has established a Water Management Plan date 01.09.2020 available for verification. The water management plan identifies the Source of water, activity, water use, possible threat, action plan, time frame, records and responsibility. Among the action plan that has been identified are as below:</p> <ul style="list-style-type: none"> a) Upstream and Downstream Water Analysis b) Drinking Water analysis to monitor drinking water quality. c) Effluent analysis as required by DOE d) Follow work instruction and SOP for any activities done at the mill to avoid water pollution e) Follow Schedule Waste management to avoid any water pollution caused by scheduled waste. f) Desilting and desludging at effluent pond for effective POME treatment. g) Periodically monitoring and maintenance on effluent and furrow system h) Desilting of reservoir/pond to maintain water level. <p>Water Analysis for Drinking Water were sampled by the management and the results are as below:</p> <ul style="list-style-type: none"> - Decagon Lab & Analytical Testing Sdn Bhd - Date: 02. June 2020 - Reference Number: LW/333/20 	<p style="text-align: center;">Yes</p>

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		<p>- Results:</p> <p><u>Drinking Water Collected at Inlet (Raw Water)</u></p> <ul style="list-style-type: none"> All parameters are within the limit as specified under the Regulations Limit follows the Raw Water Quality Standard, Ministry of Health Malaysia; Engineering Services Division; Year 2010 <p><u>Drinking Water Collected at Outlet (Treated Water)</u></p> <p>All parameters are within the limit as specified under the Regulations Limit follows the Drinking Water Quality Standard, Ministry of Health Malaysia; Engineering Services Division; Year 2010. The water can be used as a drinking water</p> <p>For water stream sampling, the analysis done by UTCL laboratory report no WI/2020/10/89 dated 29/10/2020 this cover water sampling ID WI-1417 and WI-1418 for upstream and downstream. The result showed comply with the standard.</p>	
<p>4.5.5.2</p>	<p>Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.</p> <p>- Major compliance -</p>	<p>Pasir Panjang POM discharges its POME to land application and composting plant as stipulated in its DOE's Compliance Scheduled, License No. 004649. The mill monitors the discharge to ensure it does not exceed the approved limit 960m²/day. Sampling is done to monitor the POME parameters with the results available for verification. Samples were taken from Cooling Pond 1, Cooling Pond 2, Anaerobic Pond 1, Anaerobic Pond 2, Anaerobic Pond 3, Bio Compost, Aerobic 1, Aerobic 2, Clarifier, Ultra Filter, PCD 1, PCD 3 and Biogas Reactor Outlet. The latest lab test results were dated 29.10.2020; Report Number: E1/2020/10/47; Conducted by: UTCL Laboratory.</p>	<p>Yes</p>
<p>4.6 Principle 6: Best Practices</p>			

Criterion 4.6.1: Mill Management			
<p>4.6.1.1</p>	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> <p>- Major compliance -</p>	<p>Standard Operating Procedures were available for Pasir Pajang POM. The SOP's that were verified among others were:</p> <ol style="list-style-type: none"> 1. Transparency; Doc No: SQD/SMS/1.0; Doc Date 01/08/2020 2. Core labour Standard; Doc No: SQD/SMS/4.0; Doc Date: 01.08.2020 3. Waste Management; Doc No: SQD/SMS/6.2; Doc Date: 01.08.2020. 4. Agrochemicals Management; Doc No: SQD/SMS/6.1; Doc Date: 01.08.2020 5. Grievance; Doc No: SQD/SMS/4.1; Doc Date: 01.08.2020 6. Traceability; Doc No: SQD/SMS/1.2; Doc Date: 01.08.2020 7. Consultation and Communication; Doc No: SQD/SMS/1.1; Doc Date: 01.08.2020 <p>Regular Internal Audits are conducted to ensure all SOP's are implemented.</p>	<p>Yes</p>
<p>4.6.1.2</p>	<p>All palm oil mills shall implement best practices.</p> <p>- Major compliance -</p>	<p>Implementation of Mills Best Practises in accordance with the SOPs are ensured through various methods. Among those are:</p> <ul style="list-style-type: none"> - Internal Audits - Management Reviews - Operational Checklist - Worksite Inspection Report - Linesite Inspection - Third party Environmental Audit 	<p>Yes</p>

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		- Mill Inspection Visit	
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	Annual business plan in the form of annual budget and the projection for 3 years prepared as guidance for future planning. The business plan for FY2020 contains FFB yield, CPO, OER, and KER, costs of production, milling utilization, FFB pricing etc. It also includes environment, social (workers and staff's welfare), and health and safety component.	Yes
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	Payment of fees shall be made within sixty (60) days from the date of certification of the submitted invoices as per the agreement signed. Pricing was outlined in the First Schedule of agreement. The payment terms for CPO transporter is 30 days from the date of receipt of invoice.	Yes
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Sampled of the payment records for contractors as below: i. INV# I20090005 dated 30/09/2020; Payment Voucher No.: 20000617 dated 20/10/2020 ii. INV# IV-1504392 dated 31/08/2020; Payment Voucher No.: 20000535 dated 21/09/2020	Yes
Criterion 4.6.4: Contractor			
4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	The contractors have acknowledged on the terms and conditions for complying with all RSPO, ISCC, MSPO requirements related to the execution of the contract. The contractors have been briefed on the MSPO requirements prior to work.	Yes

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<p>4.6.4.2</p>	<p>The management shall provide evidence of agreed contracts with the contractor.</p> <p>- Major compliance -</p>	<p>Mill Management has engaged contractors for varieties of works such as maintenance/ repair works and transporters. Sampled of the agreement/ letter of acceptance as below:</p> <ul style="list-style-type: none"> i. Ref. No.: MPSB/G1/6/2(2020) dated 15/06/2020 for transport of CPO from mill to refineries which valid until 31/05/2023 – SBK Logistics Sdn Bhd ii. Ref. No.: MPSB/G1/6/2(2020) dated 15/06/2020 for transport of CPO from mill to refineries which valid until 31/05/2023 – Selama (Masai) Sdn Bhd 	<p>Yes</p>
<p>4.6.4.3</p>	<p>The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.</p> <p>- Minor compliance -</p>	<p>The contractors have acknowledged that they are subject to any certification audit assessment through a physical inspection if required when agreement was signed.</p>	<p>Yes</p>

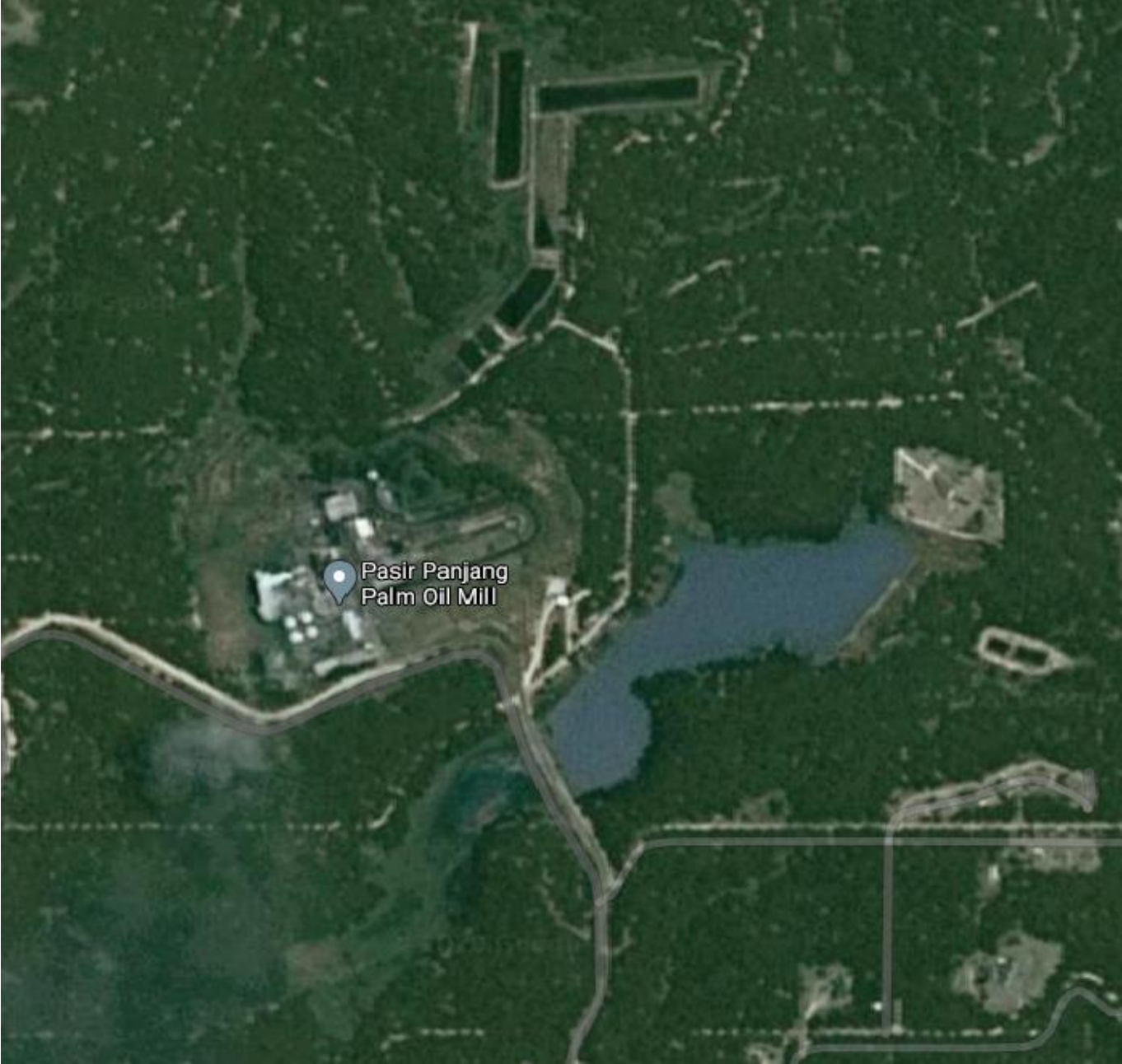
Appendix B: List of Stakeholders Contacted

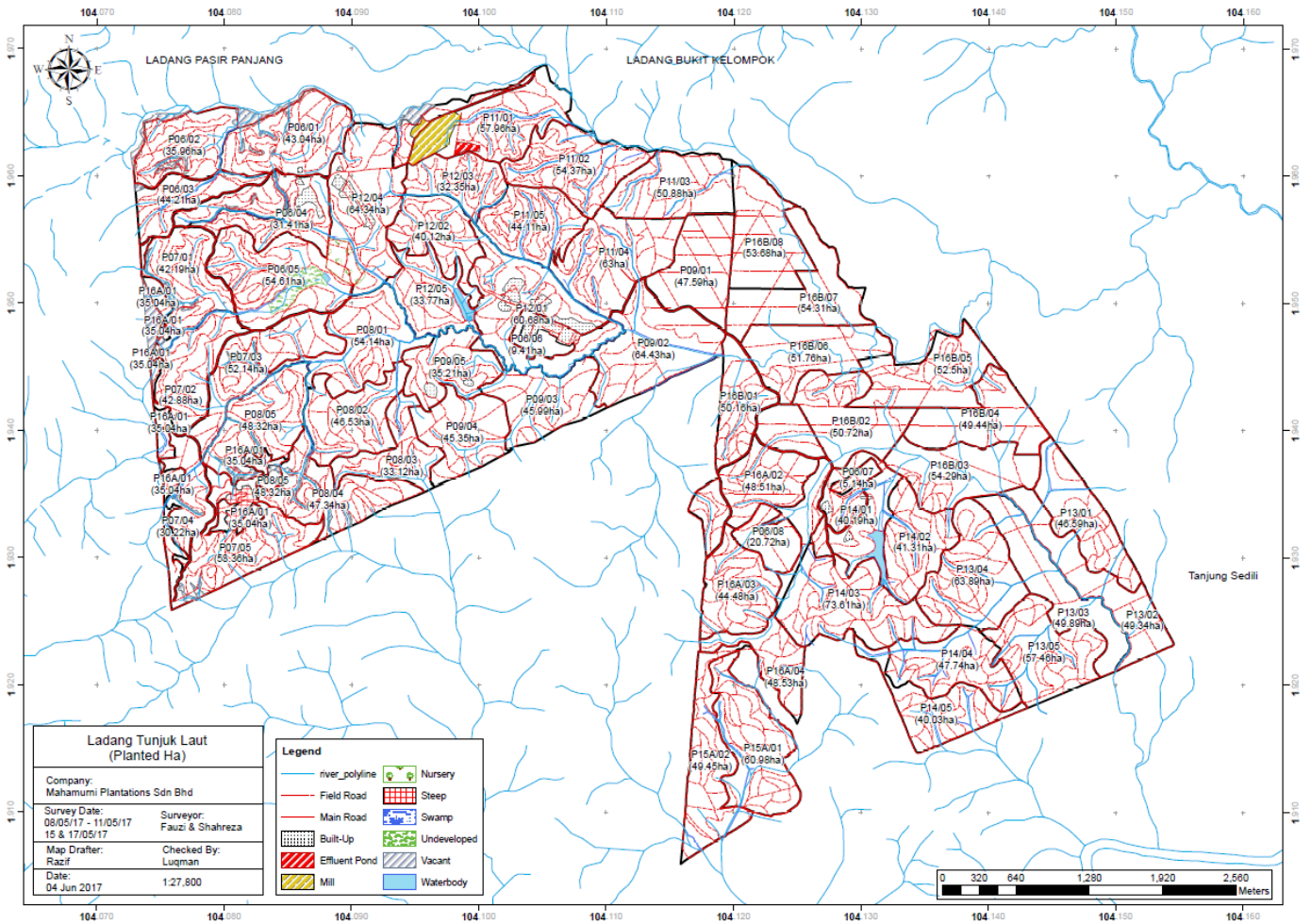
<p>Government Officer: N/A</p>	<p>Community/neighbouring village: N/A</p>
<p>Suppliers/Contractors/Vendors: N/A</p>	<p>Worker's Representative/Gender Committee: N/A</p>

Appendix C: Smallholder Member Details

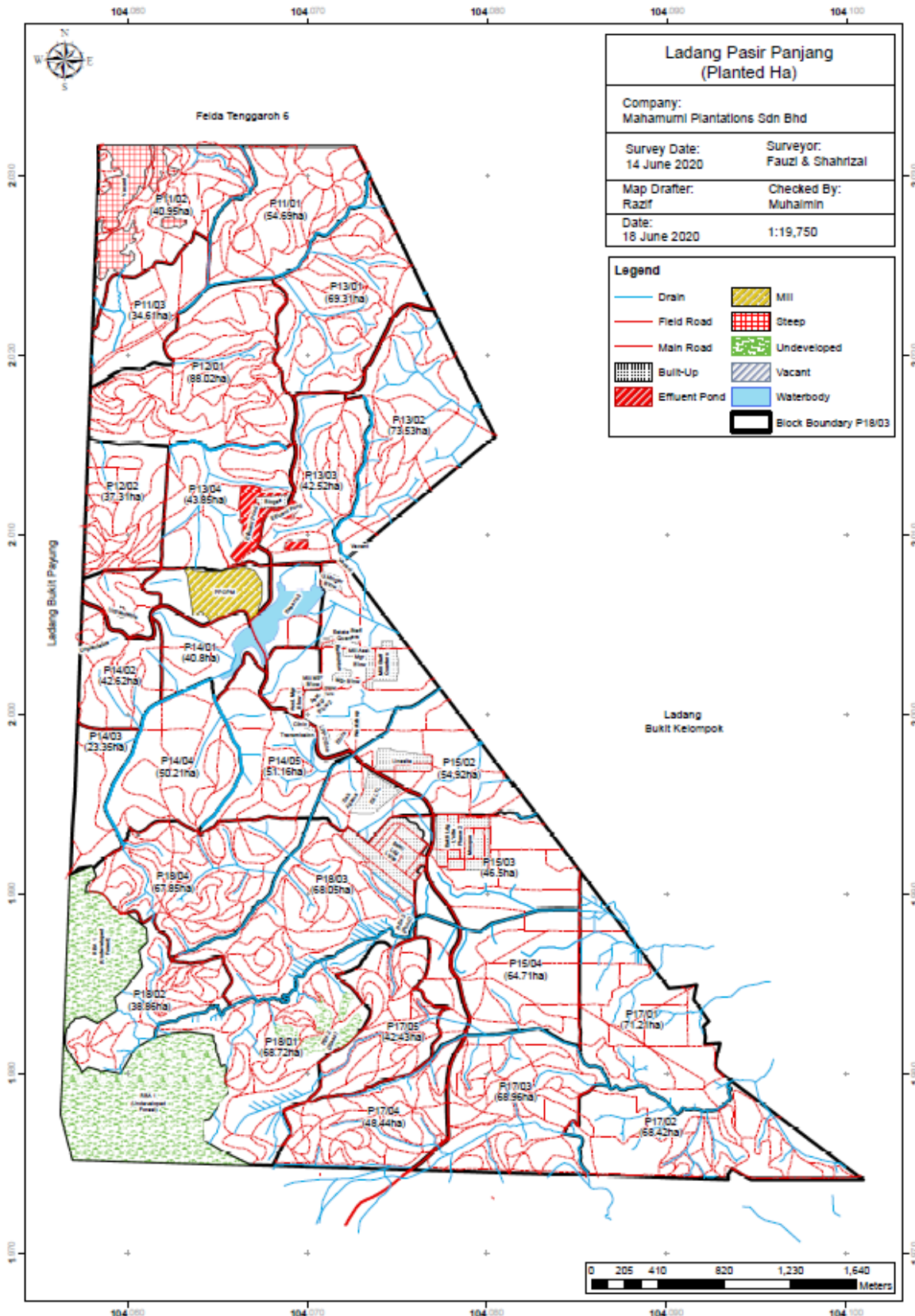
Not applicable.

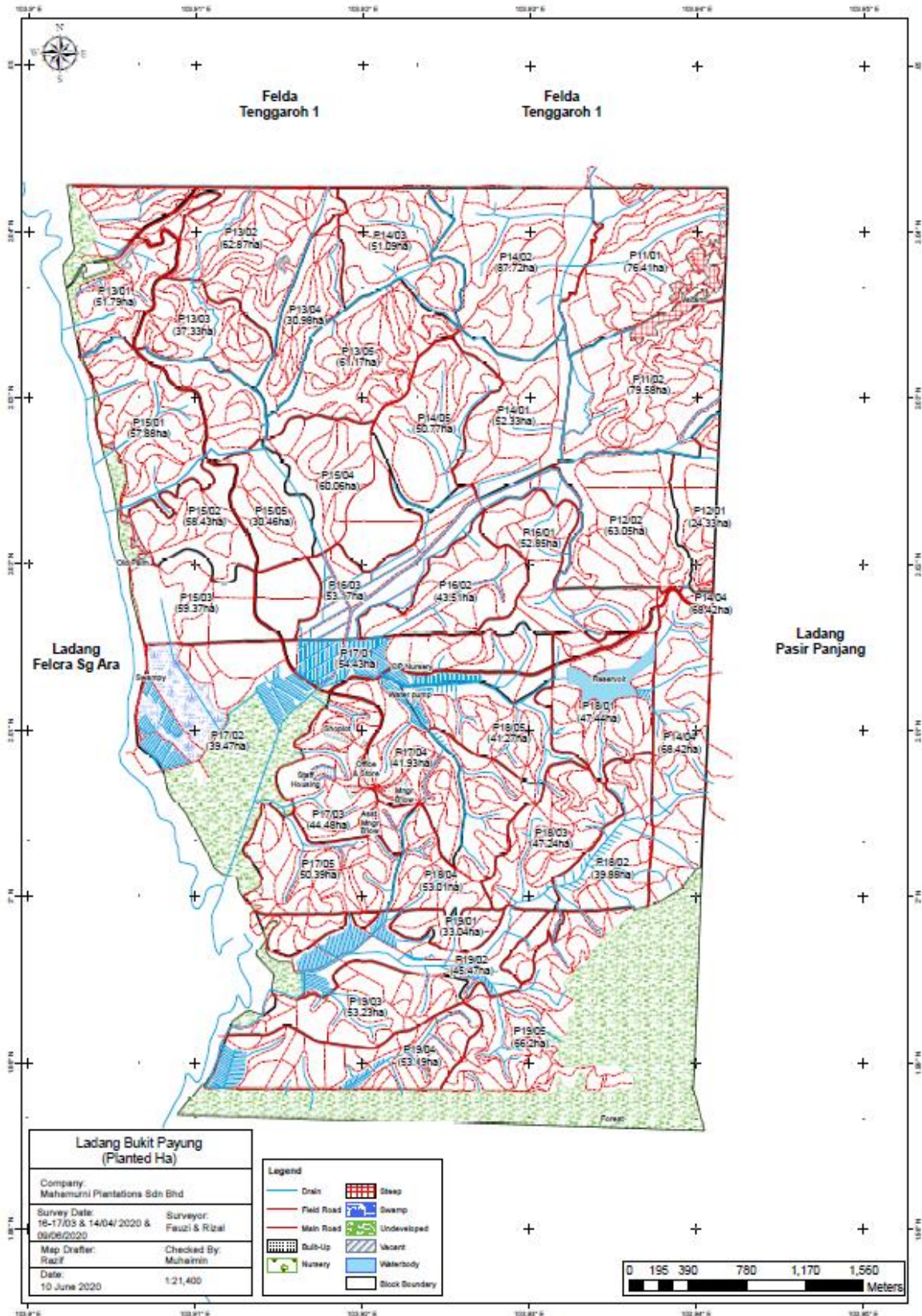
Appendix D: Location and Field Map





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Appendix E: List of Abbreviations

BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MSPO	Malaysian Sustainable Palm Oil
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RTE	Rare, Threatened or Endangered species
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure