

### MALAYSIAN SUSTAINABLE PALM OIL ANNUAL SURVEILLANCE ASSESSMENT 2 Public Summary Report

### **Palmgroup Holdings Sdn Bhd**

Client company Address: 25.1-25.2, Level 25, Wisma Sanyan No. 1, Jalan Sanyan 96000 Sibu, Sarawak, Malaysia

Certification Unit: Palmraya Pelita Sikat Plantation Sdn Bhd

Location of Certification Unit: Sg Sikat NCR Oil Palm Plantation Selangau Sibu and Mukah Division Sarawak, Malaysia

Report prepared by: Muhammad Fadzli bin Masran

Report Number: 3264920

#### **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, Malaysia Tel +60392129638 Fax +60392129639 www.bsigroup.com



TABI	LE of C	CONTENTS	age No
	Secti	ion 1: Executive Summary	3
	1.1	Organizational Information and Contact Person	3
	1.2	Certification Information	3
	1.3	Location of Certification Unit	3
	1.4	Certified Area	4
	1.5	Plantings & Cycle	4
	1.6	Certified Tonnage of FFB	4
	1.7	Uncertified Tonnage of FFB	4
	1.8	Certified Tonnage	5
	1.9	Actual Sold Volume (CPO)	5
	1.10	Actual Sold Volume (PK)	5
	Secti	ion 2: Assessment Process	6
		2.1 BSI Assessment Team	7
		2.2 Accompanying Persons	7
		2.3 Assessment Plan	8
	Secti	ion 3: Assessment Findings	
		3.1 Details of audit results	
		3.2 Details of Nonconformities and Opportunity for improvement	
		3.3 Status of Nonconformities Previously Identified and OFI	
		3.4 Summary of the Nonconformities and Status	
	<b>.</b>	3.5 Issues Raised by Stakeholders	
		ion 4: Assessment Conclusion and Recommendation	
		endix A: Summary of the findings by Principles and Criteria	
	• •	endix B: List of Stakeholders Contacted	
		endix C: Smallholder Member Details	
		endix D: Location and Field Map	
	Appe	endix E: List of Abbreviations	62



### **Section 1: Executive Summary**

1.1 Organizational Information and Contact Person					
Company Name	Palmraya Pelita Sikat Plantation Sdr	Palmraya Pelita Sikat Plantation Sdn Bhd (735421-T)			
Mill/Estate	MPOB License No. Expiry Date				
541373002000 31/07/2021					
Address	Sg Sikat NCR Oil Palm Plantation S Malaysia	Sg Sikat NCR Oil Palm Plantation Selangau, Sibu and Mukah Division, Sarawak, Malaysia			
Certification Unit	Palmraya Pelita Sikat Estate				
Contact Person Name	Raymond Nyian HQ				
Website	http://www.mafrica.com.my E-mail raymondny@mafrica.co				
Telephone	+6084 353 155 +6012 881 0052	Facsimile	+6084 332153		

1.2 Certification Information					
Certificate Number	MSPO 681081	MSPO 681081			
Issue Date	02/11/2018		Expiry date	01/11/2023	
Scope of Certification	n Production of Susta	ainable Oil Palm	Fruits		
Standard	MSPO MS:2530-Pa	rt 3 General pri	nciples for Plantatio	ons and Organ	nized Smallholders
Stage 1 Date		15/11/2017	15/11/2017		
Stage 2 / Initial Ass	essment Visit Date (IAV)	21/03/2018			
Continuous Assessm	nent Visit Date (CAV) 1	27/08/2019			
Continuous Assessm	nent Visit Date (CAV) 2	18/08/2020 (remote) 30/09/2020 - 01/10/2020 (onsite)			
Continuous Assessm	nent Visit Date (CAV) 3	TBC			
Continuous Assessm	nent Visit Date (CAV) 4	TBC			
Other Certifications					
Certificate Number			Certificate :	Issued by	Expiry Date
N/A					

1.3 Location of Certification Unit				
Name of the Certification Unit	GPS Reference of the site office			
(Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)		Longitude	Latitude	



Palmraya Pelita Sikat Estate	Sg Sikat NCR Oil Palm Plantation Selangau, Sibu and Mukah Division, Sarawak, Malaysia	112.27899	2.66919
------------------------------	---------------------------------------------------------------------------------------------	-----------	---------

1.4 Certified Area							
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted		
Palmraya Pelita Sikat Estate	1,952.96	17.70	165.37	2,136.03	91.12		
Total	1,952.96	17.70	165.37	2,136.03			

1.5 Plantings & Cycle								
Fatata			Age (Years)	)		Mature Immature		
Estate	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		ımmature	
Palmraya Pelita Sikat Estate	0.00	12.16	1,940.80	0.00	0.00	1,950.80	2.16	
Total (ha)	0.00	12.16	1,940.80	0.00	0.00	1,950.80	2.16	

Notes: 2.16Ha Declared as an immature due to crop less than 8 tonne even though the palm age has been reached 48months.

1.6 Certified Tonnage of FFB						
		Tonnage / year				
Estate	Estimated (Oct 2019 - Sep 2020)	Actual (Aug 2019 - Jul 2020)	Forecast (Oct 2020 - Sep 2021)			
Palmraya Pelita Sikat Estate	49,889.02	36,648.76	38,884.00			
Total	49,889.02	36,648.76	38,884.00			
Note: Nil						

1.7 Uncertified Tonnage of FFB						
Tonnage / year						
Estate	Estimated (Oct 2019 - Sep 2020)	Actual (Aug 2019 - Jul 2020)	Forecast (Oct 2020 - Sep 2021)			
N/A	N/A	N/A	N/A			
Total	N/A	N/A	N/A			
Note: Nil	·					



1.8 Certified Tonnage						
	Estimated (Oct 2019 - Sep 2020)	Actual (Aug 2019 - Jul 2020)	Forecast (Oct 2020 - Sep 2021)			
Mill Capacity:	FFB	FFB	FFB			
Nil	N/A	N/A	N/A			
SCC Model:	CPO (OER: %)	CPO (OER: %)	CPO (OER: %)			
Nil	N/A	N/A	N/A			
	PK (KER: %)	PK (KER: %)	PK (KER: %)			
	N/A	N/A	N/A			

1.9 Actual Sold Volume (CPO)							
CPO (MT)	MSPO Certified	Other Schemes Certified ISCC RSPO		Conventional	Total		
N/A	N/A	N/A	N/A	N/A	N/A		

1.10 Actual Sold Volume (PK)							
DV (MT)	MSPO Certified	Other Schei	mes Certified	Conventional	Total		
PK (MT)	MSF O Certified	ISCC	RSPO	Conventional			
N/A	N/A	N/A	N/A	N/A	N/A		



### **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**

Due to the COVID-19 pandemic, this assessment involved a partial remote audit. The remote audit was conducted on 18/08/2020. This on-site assessment was conducted from 30/09/2020 - 01/10/2020. The audit programme is included as section 2.3. The approach to the audit was to treat the Palmraya Pelita Sikat Plantation Estate 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 physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. MS 2530-3:2013 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the MSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix B.

All the previous nonconformities are remains closed. The assessment findings for the initial 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 year 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)
Palmraya Pelita Sikat Plantation Estate	х	х	х	х	Х

Tentative Date of Next Visit: August 16, 2021 - August 17, 2021

**Total No. of Mandays: 4 Mandays** 

#### 2.1 BSI Assessment Team

Team Member Name	Role (Team Leader or Team member)	Qualifications (Short description of the team members)
Muhammad Fadzli Masran	Team Leader	He holds Bachelor Degree in Forestry Science, graduated from University Putra Malaysia. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO 9001 and ISO 14001 at Kulim Plantations. He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018. Fluent in Bahasa Malaysia and English Language. During this assessment, he assessed on the aspects of mill and estate best practices, waste management, HCV, environmental occupational safety & health social, contracts and workers & stakeholders consultation. He is fluent in Bahasa Malaysia and English languages.

### 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).

### **Remote audit**

Date	Time	Subjects	(MFM)	ICT Planned
Tuesday 4/8/2020	10.00 - 11.00	Communication on document preparation	V	Microsoft Teams, Email, WhatsApp Video call, Teleconference
Tuesday 18/8/2020	09.00 - 09.30	<ul> <li>Opening Meeting:</li> <li>Opening Presentation by Audit team leader.</li> <li>Confirmation of assessment scope and finalize Audit plan</li> </ul>	√	Microsoft Teams, Email, WhatsApp Video call, Teleconference
	09.30 - 12.30	Document review P1 – P6 (MSPO part 3), P1: Management commitment and responsibility P2: Transparency P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices, P7: Development of New Planting (if any)	√	Microsoft Teams, Email, WhatsApp Video call, Teleconference
	12.30 - 12.45	Preparation of audit report	√	Microsoft Teams, Email, WhatsApp Video call, Teleconference
	12.45 - 13.00	Closing Meeting	√	Microsoft Teams, Email, WhatsApp Video call, Teleconference

### **Onsite Audit**

Date	Time	Subjects	MFM
Wednesday 30/09/2020	08.30 - 09.00	Opening Meeting:     Opening Presentation by Audit team leader.     Confirmation of assessment scope and finalize Audit plan	√
Palmraya Pelita Sikat Estate	09.00 - 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	V
	09.30 - 12.00	Stakeholder interviews	$\checkmark$
	12.30 - 13.30	Lunch	<b>√</b>



Date	Time	Subjects	MFM
	13.30 - 16.30	Continue with document review Document review P1 – P6 (MSPO part 3), P1: Management commitment and responsibility P2: Transparency P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices, P7: Development of New Planting (if any)	V
Thursday 01/10/2020	08.30 - 11.30	Continue with document review Document review P1 – P6 (MSPO part 3), P1: Management commitment and responsibility P2: Transparency P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices, P7: Development of New Planting (if any)	V
		Preparation of audit report	<b>√</b>
	12.00 - 12.30	Closing Meeting	√
	12.30 - 14.00	Auditor travel	



### **Section 3: Assessment Findings**

#### 3.1 Details of audit results

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

- ☐ MSPO MS 2530-2:2013 General Principles for Independent Smallholders
- ☐ MSPO 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 were one (1) Major & no (0) Minor nonconformities raised. The Palmraya Pelita Sikat Estate Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Major Non-conformity(ies) has been verified for its effectiveness and closed accordingly.

	Major Nonconformities:							
Ref:	Area/Process: Palmraya Pelita Sikat Estate Clause: 4.4.5.3							
1963449-202009-M1	Issue Date: 01/10/2020				ate: 31/12/2020			
Requirements:	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.							
Statement of Nonconformity:	Pay and condition Ordinance under		vorking on res	t day do	es not meet Sarawak Labour			
Objective Evidence:	Noted that harvesters s follows has been working on their rest day in the month of March, April and May 2020. However, they are not paid double rate as per Sarawak Labor Ordinance under section 105 (5) that stated:							
	"An employee employed on piece rates who works on a rest day shall be paid twice his ordinary rate per piece".							
	Sampled the checkroll and detail payslip for harvesters as follows:							
	Employee No.	Working on Rest day	Paid Rate (Normal Rat	e/ton)				
	JAM-04	3/5/2020 31/5/2020 21/6/2020	RM 36.00					



	DAP-(		29/3/2020 3/5/2020 21/6/2020 3/5/2020 21/6/2020	RM 33.00				
Corrections:	Planned action to remove nonconformity, with deadline:-  To pay double rate for rest day work on harvesting and other piece rated activities.						s.	
	# 1	Action Ta		ss of this action, Responsible Person HRD, HQ	Compl Date 9/11/2	etion	Status In progress	
Root cause analysis:		eration yet		e requirement b	ecause t	here is	no person in ch	arge
Corrective Actions:	Planned action to remove nonconformity, with deadline:-  Admin Officer will assist Estate Manager to do the monitoring activity to ensure the requirements is fully enforced.  Planned verification of effectiveness of this action, with deadline:-					the		
	#	Action Tak	en	Responsible Person	Comple Date	etion	Status	
	1	HR Management	Email from Sr er (HQ) to estate ent to enforce rements at site		9/11/2	020	In progress	
	2	Briefing on Operations Manager Plantation	the reminder by Genera & Senion Manager to al nagement stafi	  - 	9/11/2	020	In progress	
Assessment Conclusion:	_	NC Close ou						
	The espayme  1. P:  2. P:  3. P:  4. P:  5. P:	state has m	nade payment fo ated 05/11/2020 50041 50050 50017 50051 40040	r the underpaid ). Reviewed the	-		•	's as



7. PSSB/PE20060051
The estate has conducted the staffs meeting on 11/11/2020. In the meeting, the Operation General Manager has reminded the staff to not offer workers to work on Restday and Public holidays.
The evidence submitted were found adequate and effectively implemented. The Major NC was closed on 07/12/2020.

Opportunity For Improvement					
Ref: Area/Process: Clause:					
Objective Evidence:	N/A				

	Noteworthy Positive Comments				
1	Good commitment by the management				
2	Good relationship with adjacent stakeholders				

### 3.3 Status of Nonconformities Previously Identified and OFI

Minor Nonconformities:							
Ref:	Area/Process: Palmraya Pelita Sikat Estate	<b>Clause:</b> 4.4.4.2					
1817553-201903-N1	<b>Issue Date:</b> 27/08/2019	<b>Due Date:</b> 18/08/2020					
Requirements:	The occupational safety and health plan shall cob) The risks of all operations shall be assessed a						
Statement of Nonconformity:	The HIRARC is not review accordingly when acci	ident occur.					
Objective Evidence:	Noted during document review, the HIRARC was for harvesting operation for accident occur on 4/						
Corrections:	To review HIRARC for the accident occur for harvesting operation on 4/3/2019 and 28/3/2019.						
Root cause analysis:	The information on HIRARC reviewing procedure was not communicate regularly to the safety committee as there might some changes in management staff working at the estate.						
Corrective Actions:	Review the HIRARC procedure and carry out briefing/ training to the safety committee to update their information and knowledge on HIRARC requirements.						
Assessment Conclusion:	Evidence submitted: i. HIRARC review on the harvesting operation dated 25/10/2019 and addition to HIRARC register for Motorcycle usage dated 28/10/2019						
	ii. Workplace inspection records dated 8 - 9/10/2019, 15 - 16/10/2019 and 21 - 22/10/2019.						
	iii. Safety and Health Committee meeting and HIRARC review training dated 23/9/2019. The effectiveness of the implementation will be verified during next assessment						
Verification Statement	No recurrence issue on the non-conformity. The	minor NC is effectively closed.					



	Minor Nonconformities:				
Ref:	Area/Process: Palmraya Pelita Sikat Estate	Clause: 4.4.5.4			
1817553-201903-N2	<b>Issue Date:</b> 27/08/2019	<b>Due Date:</b> 18/08/2020			
Requirements:	Management should ensure employees of con- industry minimum standards according to the e- the contractor and his employee				
Statement of Nonconformity:	Employment contract for employees of contractor	ors was not made available.			
Objective Evidence:	No employment contract between contractor Hong Sing Teck and workers sampled as per below: i) AU200426 ii) A1903034 iii) AT235425				
Corrections:	Contractor issued employment contract to their	workers as per audit findings.			
Root cause analysis:	There is no responsible person appointed to provided with employment contract.	monitor the contractor workers are			
Corrective Actions:	Admin Officer is appointed with responsibility contractor workers are provided with employme				
Assessment Conclusion:	Evidence submitted:				
	i. Appointment letter for Person Responsible for Monitoring Employment Contractor Workers dated 30/9/2019 signed by the Estate Manager.				
	ii. Employment contract between the said workers and Contractors dated 9/8/2019				
	The effectiveness of the implementation will be verified during next assessment				
Verification Statement	No recurrence issue on the non-conformity. The	minor NC is effectively closed.			

### 3.4 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1608456-201802-M1	Major	21/03/2018	Closed 21/05/2018
1608456-201802-M2	Major	21/03/2018	Closed 21/05/2018
1608456-201802-M3	Major	21/03/2018	Closed 21/05/2018
1608456-201802-N1	Minor	21/03/2018	Closed 27/08/2019
1817553-201903-N1	Minor	27/08/2019	Closed 07/12/2020
1817553-201903-N2	Minor	27/08/2019	Closed 07/12/2020
1963449-202009-M1	Major	01/10/2020	Closed 07/12/2020



### 3.5 Issues Raised by Stakeholders

IS#	Description				
_	Issues:				
1	TR Badi Lubok Bemban				
	The long house was participate with the oil palm development project with the estate. All the payment was made as per agreement. No delay on the payment during the COVID 19 pandemic situation.				
	Management Responses:				
	The management will always maintain good relationship with the long house. The payment will always made on time as per stated in the agreement.				
	Audit Team Findings:				
	No further issue				
2	Issues:				
	TR Badi Lubok Bemban				
	The estate provide job opportunities for the long house villagers.				
	Management Responses:				
	The estate will always open for any job opportunities. The job will be given base on the applicant qualification.				
	Audit Team Findings:				
	No further issues				
3	Issues:				
	JCC Representative The JCC meeting was conducted once a month. The committee can discuss any issue freely with the management.				
	Management Responses:				
	The estate management will always maintain good relationship with the committee and open to any suggestion by the committee				
	Audit Team Findings:				
	No further issues				



### **Section 4: Assessment Conclusion and Recommendation**

### Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings

Based on the findings during the assessment Palmraya Pelita Sikat Plantation Estate Certification Unit complies with the MS 2530-3:2013. It is recommended that the certification of Palmraya Pelita Sikat Plantation Estate Certification Unit is approved and/or continued.

Certification Unit is approved and/or continued.		
Acknowledgement of Assessment Findings	Report Prepared by	
Name:	Name:	
Raymond Nyian	Muhammad Fadzli b. Masran	
Company name:	Company name:	
Palmgroup Holdings Sdn Bhd	BSI Services Malaysia Sdn. Bhd	
Title:	Title:	
Manager, Sustainability	Client Manager	
Signature:	Signature:	
Raymond Nyian	8	
Date: 31/05/2021	Date: 31/05/2021	



### **Appendix A: Summary of the findings by Principles and Criteria**

Criterion / Indicator		Assessment Findings	Compliance		
4.1 Princi	4.1 Principle 1: Management commitment & responsibility				
Criterio	<b>1 4.1.1 –</b> Malaysian Sustainable Palm Oil (MSPO) Policy				
4.1.1.1	A policy for the implementation of MSPO shall be established.  - Major compliance -  Major compliance -  Palmgroup Holdings Sdn. Bhd. has established a policy on sustainable palm oil production. Signed by MD, Mr Tiong Chiong Hee dated 5/5/2017. Refer MSPO Management Policy and Procedure, PGHSB/SOPP/014/2016 (2019-05), version 5 dated 25/03/2019.				
4.1.1.2	The policy shall also emphasize commitment to continual improvement.  - Major compliance -	The established policy has emphasized on the commitment for key legal, social and environmental consideration with the objective of improving the estate operation.			
Criterio	1 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 -	Palmgroup Holdings Sdn. Bhd. has established Internal Audit Procedure under the MSPO Management Policy and Procedure, PGHSB/SOPP/014/2016 (2019-05), version 5 dated 25/03/2019. The Internal Audit covered both documentation and field operations. Rating was given based on audit finding.	Complied		
		The Sustainable Unit, has established TQM Sustainability Audit Visit Plan for Year 20xx and communicated with the operating units TQM Sustainability Audit Visit Plan for Year 2020. Prior to the Internal Audit, the Lead Auditor will submit the audit Plan. Sighted the MSPO Internal Audit Plan (Remote Audit) for Year 2020 dated 18/5/2020.			
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of	Latest internal audit conducted on 30/06/2020 – 03/07/2020 by the Sustainable Unit. The audit has been conducted remotely due to Movement Control Order in Sarawak23 OFI were identified during the	Complied		



Criterion	n / Indicator	Assessment Findings	Compliance
	strengths and root causes of nonconformities, in order to implement the necessary corrective action.	audit. The estate has submitted the Corrective Action Plan and the evidence of the NC as per report dated 25/09/2020	
	- Major compliance -		
4.1.2.3	Report shall be made available to the management for their review.	Internal Audit Result and Summary Report dated 03/07/2020 and Evidence Acceptance for Internal Audit dated 25/09/2020 was made	Complied
	- Major compliance -	available for management review.	
Criterion 4	4.1.3 – Management Review		
4.1.3.1	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.  Latest MSPO Management Review was carried out on 05/08/202 Minute Meeting of Management Review MSPO was available. pertinent elements for MSPO implementation has been reviewed at presented to top management.		Complied
	- Major compliance -		
Criterion 4	4.1.4 – Continual Improvement		
4.1.4.1	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.  - Major compliance -	The estate has established continuous improvement plan based on the significant impact activity identified based Social Impact Assessment and Environmental impact Assessment. The action plan was documented in Environmental Continual Improvements Plan 2020 and Social Continual Improvement Plan 2020 dated 10/01/2020.	Complied
		Among the plans established as follows:	
		Water quality management	
		Chemical management	
		Labour line management	
		Flora and fauna for RTE	



Criterio	n / Indicator	Assessment Findings	Compliance
		Air quality management	
		Local community	
		Woman and children	
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.	Palmgroup Holdings has established SOP on Procedures on Handling New Information & Techniques or New Industry Standard & Technology. Refer document no. PGHSB/SOPP/005/2018 rev 1 dated June 2018.	Complied
	- Major compliance -	In the SOP stated that information on the new technologies can be obtained through approach from suppliers, attending seminar, exchange information with other estates and internet.	
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.  Palmgroup Holdings has established SOP on Procedures New Information & Technology. Refer document no. PGHSB/SOPP/005/2018 June 2018.		Complied
	- Major compliance -	If there is any new techniques or new industry standard or technology suitable to be implemented by the company, action plan is normally incorporated in the company's training plan where type of training is identified, date of training, identified participants and training provider.	
4.2 Princi	ple 2: Transparency		
Criterion	4.2.1 – Transparency of information and documents relevant	to MSPO requirements	
4.2.1.1	by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or PGHSB/SOPP/002/2018 rev. 1 dated Jan 2018.		Complied
	disclosure that could result in negative environmental or social outcomes.	Information requested by relevant stakeholders was communicated in appropriate languages and forms as per sighted Procedure of	



Criterio	n / Indicator	Assessment Findings	Compliance
	- Major compliance -	Application for Company's Information & Application for Company Information Flow Chart that requires stakeholder need to fill in Information Request Form.	
		Sighted the implementation of the SOP as recorded in "Records Book of Stakeholders or Interested Party Who Has Viewed/Obtained Documents". The records were kept since 2017. Latest request was recorded on 03/09/2019.	
4.2.1.2	Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental	The estate has also listed documents for publicly available as per memorandum dated 02/01/2020. Document listed as publicly available in the estate such as:	Complied
	or social outcomes.	Safety and health plans;	
	- Major compliance -	Plans and impact assessments relating to environment and social impacts;	
		Pollution prevention and reduction plans;	
		Details of complaints and grievances;	
		Negotiation procedures;	
		Continual improvement plans.	
Criterio	n 4.2.2 - Transparent method of communication and consult	ation	
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders.  - Major compliance -  Palmgroup Holdings has established SOP for consultation and communication for all operation units under the group company and documented in SOP as follows:		Complied
	Pajor compliance	Complaint and Grievance Policy signed by Managing Director on 5/5/2017	



Criterior	/ Indicator	Assessment Findings	Compliance
		Communication and Consultation Procedures. Refer document no. PGHSB/SOPP/001/2015 (2019-02), ver. 2, date issued: 15/4/19	
		Complaint and Grievance Procedures. Refer document no. PGHSB/SOPP/002/2015, ver. 1, date issued: 21/12/2015	
		Task: TQM Management Plan on Grievance and Complaint Procedure- C6.3	
		Flowchart of Complaint in Palmraya Pelita Sikat Plantation Sdn. Bhd.	
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 -	The estate has appointed Asst. Manager as person responsible for issues related to consultation and communication with the relevant stakeholders as per appointment letter for Estate Social and Legal Coordinator dated 03/01/2020. Refer letter no. PRPSPSB/S&L/17-001.	Complied
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.	The estate has listed all the relevant stakeholders in Register of Stakeholders, refer document no. ST02. The register was reviewed on annually basis. The stakeholders were categorized into:	Complied
	- Major compliance -	Supplier	
		Government Body	
		Community Group & NGO	
		Local Community	
		Internal Stakeholder	
		External stakeholders	
		Records of consultation and communication was recorded in Monitoring of Action Request, refer document no. ST19. Reviewed the monitoring records dated 24/06/2020.	



Criterio	Criterion / Indicator Assessment Findings		
Criterio	n 4.2.3 - Traceability		
		SOP on the traceability of the FFB has been established under Guidelines on Traceability Procedures, PGHSB/SOPP/001/2017, rev: 02 dated 20/07/2019.	Complied
	- Major compliance -		
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system.	The estate has established Traceability Inspection Checklist. The rating were given as follows:	Complied
	- Major compliance - 0 - Not Comply		
		1 – OK-Satisfactory	
		2 Yes-Excellent	
		The information in the checklist includes Field no., Assessment Team, date of inspection, no of workers at the field and person responsible. Among the items monitored in the checklist such as	
		Field Condition	
		Safe handling	
		Quality Harvesting	
		Loose fruit Collection	
		Production Recording	
		Reviewed the inspection records dated 11/06/2020 and 17/06/2020.	
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system.	The estate has appointed the Cadet Assistant Manager as Person Responsible to maintain the traceability system in the estate as per	Complied
	- Minor compliance -	appointment letter no. PPSPSB/TSL/17-001 dated 25/06/2020 signed	



Criterio	n / Indicator	Assessment Findings	Compliance	
		by the Estate Manager. In the appointment letter stated the jobs description as Traceability Coordinator.		
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained.	chit, mill weighbridge ticket, FFB daily records book and monthly	Complied	
	- Major compliance -	summary of FFB dispatch, the traceability was found to be in order.  The information about date of delivery, origin field of FFB, weight and number of bunches was well recorded.		
4.3 Prin	ciple 3: Compliance to legal requirements			
Criterio	<b>1 4.3.1</b> – Regulatory requirements			
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.	The estate continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is	Complied	
	- Major compliance -	monitored by the operating units and sustainability team. The estate had obtained and renewed license and permits as required by the law.		
		Reviewed the sampled permits and license as follows:		
		MPOB license no. 541373002000 valid till 31/07/2021		
		Business license no. A840101 valid till 30/06/2021		
		Petrol storage permit no. LB1300LSP2019000010 valid till 31/12/2020		
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register.	and documented in Legal Register. Refer doc. no. OT05. The list was	Complied	
	- Major compliance -	updated if there any updated to the Legal Register.		
		Reviewed the Legal Register References dated 07/08/2020.		



Criterio	n / Indicator	Assessment Findin	gs		Compliance
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.  - Major compliance -	requirements register. information from webs Legal Register was up	The Sustainability Unit (in HQ) is responsible to update the legal requirements register. The most common method used were obtaining information from websites of government agencies and news. The Legal Register was updated if there any updated version or new applicable law or other requirements.		
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.  - Minor compliance -				Complied
			Coordinator as per	er as person responsible appointment letter no.	
Criterio	n 4.3.2 – Lands use rights				
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.	The was no evidence to show that oil palm cultivation activities in both estates visited had diminished the land use rights of others. Verified documents to show legal ownership of its land.		Complied	
	- Major compliance -	documents to snow leg	al ownership of its land	1.	
4.3.2.2	ownership or lease, history of land tenure and the actual use of the land was verified as per the following: the land.  Sighted the sampled land title as follows:				Complied
	- Major compliance -	Land title/agreement	Legal ownership/lease	Land use type	
		Memorandum of consent (MOC), KKT/NCR/97 and	JVC agreement between with the lease period for 60	Oil palm plantation	



Criterion / Indicator		Assessment Findings	Compliance
		JVC agreement years until 23th dated 24th October October 2065 2005	
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.	The legal perimeter boundary markers were clearly demarcated and visibly maintained on the ground as per sample sighted in the field block boundary to stakeholder area visited.	•
	- Major compliance -		
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).	No disputes have been recorded in all sample estates area. There is no evidence of conflict present in this estate. There is no violence on instigated violence in maintaining peace because company has clear procedures for land conflict.	Complied
	- Minor compliance -	There is no land dispute for the estates.	
Criterio	n 4.3.3 – Customary rights		
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.	There is no customary land within or surrounding in the estate. There are also no land disputes or claims involving the estates. The company has proper legal land titles for the land ownership.	Complied
	- Major compliance -		
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available.	There is no customary land within or surrounding in the estate. There are also no land disputes or claims involving the estates. The company	Complied
	- Minor compliance -	has proper legal land titles for the land ownership.	
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available.	Negotiation and FPIC were recorded has been conducted as per Memorandum of Consent and a Principal Deed executed through Joint Venture Company, Palmraya Pelita Sikat Plantation Sdn Bhd (JV	



Criterio	n / Indicator	Assessment Findings	Compliance
	- Major compliance -	Agreement between Pelita Holdings Sdn Bhd and Palmraya Plantation Sdn Bhd; Project: Proposed Development of NCR Oil Palm Plantation at Sg. Sikat, Ulu Mukah, Mukah Divisions, Sarawak; dated 24/10/2005). Total of 340 NCR land owners participate in the FPIC process.	
		Copies of negotiated agreements were made for review.	
4.4 Prin	ciple 4: Social responsibility, health, safety and emplo	yment condition	
Criterio	n 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 -	An impact assessment on social and environment for the estate has been conducted by the Manager, Sustainability. A Social Continual Improvement plan has been established base on the results of the impact assessment. Among the risk identified in the assessment as follows:	Complied
		SR0: Social Management System	
		Stakeholder Register	
		Communication and consultation mechanism	
		Public transparency	
		Complaint and Grievance	
		Policies and SOPs	
		SR1: Local community	
		Free, prior, inform and consent (FPIC)	
		SR2:Traceability & fair trade	



Criterion / Indicator	Assessment Findings	Compliance
	FFB origins, supply and pricing	
	SR3: OSH	
	Health and safety at workplace and line site	
	SR4: Work conditions	
	Decent living wage (DLW)	
	Freedom of association and right to bargain collectively	
	Equal opportunity (non-discrimination)	
	Forced labor	
	SR5: Living conditions	
	Accommodations, facilities, etc.	
	SR6: Women and children	
	Women rights: sexual harassment	
	Children: child labor	
	In the management plan established includes the action required, indicator to monitor, monitoring point, timeline and person responsible.	
	The estate has established Social Monitoring Scheduled Plan FY 2020. Reviewed the monitoring plan as at dated 24/06/2020.	
	Among monitoring point implemented in the management plan such as ST19 form: Monitoring of action request, complaint and grievances form, feedback and response to complaint, CSR records and training records.	;



Criterio	n / Indicator	Assessment Findings	Compliance
Criterio	1 4.4.2: Complaints and grievances		
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented.	The estate adapt the established SOP to deal with complaints and grievances and documented in Complaint and Grievance Procedure.	Complied
	- Major compliance -	Refer document no. PHGSB/SOPP/002/2015 ver. 1 dated 21/12/2015.	
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.	The estate adapt the established SOP to deal with complaints and grievances. The system able to resolve disputes in an effective, timely	Complied
	- Major compliance -	and appropriate manner that is accepted by all parties.	
		Based on the SOP established, all complaint or grievances must be recorded in the 'Borang Aduan". In the form stated the complainant information, complaint type, complaint details, action to be taken, and complaint status and complainant verification.	
		Reviewed the complaint made through "Borang Aduan" dated 18/06/2020, minutes meeting of complaint and grievances committee dated 30/07/2020 and feedback letter to complaint dated 06/06/2020.	
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.	Based on the SOP established, all complaint or grievances must be recorded in the 'Borang Aduan" which available and accessible to the stakeholders. Noted during interview with the stakeholders, they were	Complied
	- Minor compliance -	aware of the "Borang Aduan".	
		Based on the SOP established, all complaint or grievances must be recorded in the 'Borang Aduan". In the form stated the complainant information, complaint type, complaint details, action to be taken, and complaint status and complainant verification.	
		Reviewed the complaint made through "Borang Aduan" dated 18/06/2020.	



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 -	Based on the SOP established, all complaint or grievances must be recorded in the 'Borang Aduan" which available and accessible to the stakeholders. Noted during interview with the employee and stakeholders, they were aware of the "Borang Aduan". Most of the complaint raised through verbal and recorded in the complaint form.	Complied	
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 -	All complaint or grievances must be recorded in the "Borang Aduan". The estate maintain complaint and grievances since 2019.  Among monitoring point implemented in the management plan such as ST19 form: Monitoring of action request, complaint and grievances form, feedback and response to complaint, CSR records and training records. Reviewed the ST19 form dated 24/06/2020.	Complied	
Criterio	n 4.4.3: Commitment to contribute to local sustainable devel	opment		
4.4.3.1	Growers should contribute to local development in consultation with the local communities.  - Minor compliance -	The management has allocated some fund for local contribution and donation. Besides, the estate also made contribution to longhouse for festival celebration and school teacher's day celebration etc.	Complied	
		Among the CSR conducted in FY 2020 as follows:  Donate used tire for school beautification project dated 14/02/2020		
		Lend backhoe for upgrading work to volleyball court dated 22/06/2020		
Criterio	n 4.4.4: Employees safety and health		<u> </u>	
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.  - Major compliance -	The company has established Safety and Health Policy signed by the Managing Director dated 1/1/2019. In the policy stated the commitment of the company to ensure the estate area is safe and healthy to all its workers and to everyone who is involve in its estate activities. The policy was available in Bahasa Malaysia and English.	Complied	



Criterion / Indicator		Assessment Findings	Compliance	
		The policy was communicated to all the employee through briefing, training and displayed on signboard at designated place at the estate.		
		The estate has established safety and health plan. Reviewed the sampled implementation as follows:		
		The estate reviewed the chemical register on annually basis. reviewed the chemical register dated 03/01/2021		
		Workplace inspection was conducted on quarterly basis prior to Safety and Health Committee meeting. Reviewed the inspection reports dated 10/06/2020, 11/06/2020, 14/06/2020, 17/06/2020, 23/06/2020		
4.4.4.2	The occupational safety and health plan shall cover the following:	Palmgroup Holdings Sdn. Bhd. has established Safety and Health Policy signed by the Managing Director dated 01/01/2019. The policy was communicated to all the employee through briefing, training and displayed on signboard at designated place at the estate.	Complied	
	A safety and health policy, which is communicated and implemented.			
	The risks of all operations shall be assessed and documented.	The estate has conducted risk assessment on all main and support operations in the estate and documented in the HIRARC register. The HIRARC was reviewed on annually basis or when necessary. Reviewed the latest HIRARC review dated 27/07/2020.		
	An awareness and training programme which includes the following requirements for employees exposed to pesticides:			
	all employees involved shall be adequately trained on safe working practices	All workers involve with pesticides handling was provided with continuous training as planned in the training program.		
	all precautions attached to products shall be properly observed and applied	Reviewed the training records as follows:		
	The management shall provide the appropriate PPE at the place	Chemical mixing and triple rinsing training dated 28/01/2020		
	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).	SSOP for chemical spraying (herbicide) dated 11/02/2020		
		SSOP for chemical spraying (pest and disease) dated 11/01/2020		
		SSOP for chemical and fertilizer store dated 18/02/2020		



Criterion / Indicator	Assessment Findings	Compliance
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 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.  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.	The management have provided appropriate PPE to all workers base on type of work requirement. Sighted the PPE issue recorded in 'Rekod Pengeluaran Alatan Perlindungan Diri'. Reviewed the the PPE issuance records dated 13/01/2020, 06/02/2020, 19/03/202002/05/2020  The management has established Safety Operation procedure for chemical handling – Chemical and Fertilizer store, Chemical mixing and Chemical spraying. Noted during site visit, the chemical was stored in the designated store under lock and key. The balance chemical from the premixing of chemicals was stored back in the chemical store.	
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.	Palmgroup Holdings Sdn. Bhd. has appointed the Estate Manager as Safety and Health committee Chairman as per appointment letter signed by the Operational General Manager.	
Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.	The estate has appointed the Sr. Asst manager as Safety and Health Coordinator as per appointment letter no. PPSPSB/SHC/001 dated	
Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.	03/01/2020. The estate management has appointed safety and health committee consist of secretary, management representative and	
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.	employee representative. The committee conducted meeting on quarterly basis to discuss on safety and health issue such as workplace inspection reports, training reports, accidents reports, medical surveillance and etc. Sighted the minutes dated 07/01/2020 and	
Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.	24/07/2020.	
- Major compliance -	The estate has established accident and emergency procedures and documented in Plantation Fire Preparedness Plan and Responds Plan. Noted during interview with workers, they can explained the emergency response procedure during fire incident at line site.	
	The first aid box was provided at few station at workplace with responsible first aider. The estate conducted first aid kit monitoring on monthly basis. The estate continuously provided training to the first	



Criterior	n / Indicator	Assessment Findings	Compliance
		aider in the estate. Reviewed competent first aider certificate as follows:	
		(PCA01)02177 valid till 04/11/2021	
		(PCA01)02181 valid till 04/11/2021	
		(PCA01)02184 valid till 04/11/2021	
		Reviewed the training records dated 14/02/2020.	
		Accident records were maintain and updated by the Safety and Health Coordinator and reported to the HQ on monthly basis. The accident records was discuss during safety and health committee meeting conducted on quarterly basis.	
		Reviewed the JKKP 8 submitted through MyKKP on 77/01/2020 with 5 accident recorded.	
Criterio	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 -	The policies on good social practices regarding human rights in respect of industrial harmony for Palmgroup Holdings Sdn. Bhd. were established as following:	Complied
		Employment Policy. Refer document no. PGHSB/SOPP/011/2016, Ver. 01, dated 22/02/2016	
		Child Labour Policy. Refer document no. PGHSB/SOPP/005/2016, Ver. 02, dated 05/05/2017	
		Equal Opportunity Policy. Refer document no. PGHSB/SOPP/007/2016, Ver.02, dated 05/05/2017	
		Special Labour and Forced Labour Policy. Refer document no. PGHSB/SOPP/008/2017, Ver. 02, dated 05/05/2017	



Criterion	/ Indicator	Assessment Findings	Compliance
		Freedom of Association & Collective Bargaining Policy. Refer document no. PGHSB/SOPP/009/2017, Ver. 02, dated 05/05/2017	
		Human Rights Policy. Refer document no. PGHSB/SOPP/010/2017, Rev. 02 , dated 05/05/2017	
		Sexual Harassment Policy. Refer document no. PGHSB/SOPP/012/2017, Rev. 02, dated 05/05/2017	
		Women Rights Policy. Refer document no. PGHSB/SOPP/013/2017; Rev. 02, , dated 05/05/2017	
		Zero Burning Policy. Refer document no. PGHSB/SOPP/014/2015; Rev. 01, , dated 21/07/2015	
		Complaints and Grievance Procedures. Refer document no. SOPP/002	
		Communication and Consultation Procedures. Refer document no. SOPP/00	
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,	The estate adapt the company Equal Opportunity Policy. Refer document no. PGHSB/SOPP/007/2016, Ver.02, dated 05/05/2017.	Complied
	nationality, social origin or any other distinguishing characteristics.	There are no discriminatory practices in the estate. The workers were equally treated for male and female and locals and foreign workers. All	
	- Major compliance -	workers receive free accommodation, electricity, medical and insurance as stated in the employment contract. Reviewed employment contract for employee with passport no/identification card no as follows:	
		B4148306	
		C0264400	
		B0091809	



Criterio	ı / Indicator	Assessment F	indings			Compliance
		AT234816				
		AT5336718				
		AU200406				
		AU055385				
		B4435155				
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 -	meet Sarawak La Noted that harve the month of Ma double rate as p that stated: "An employee en be paid twice his	sters s follows herch, April and Ma er Sarawak Lab nployed on piece ordinary rate pe	as been working on their ay 2020. However, they for Ordinance under sector rates who works on a reprince".  payslip for harvesters as Paid Rate (Normal Rate/ton)  RM 33.00  RM 33.00	r rest day in are not paid tion 105 (5) est day shall	Major NC



Criterion / Indicator		Assessment Findings	Compliance	
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.	No external contractors employees involved in direct estate core operations such as spraying, manuring, rat baiting and spraying.  The estate only engage the contractor for FFB transportation.	Complied	
	- Minor compliance -			
4.4.5.5	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	The estate has established employee master list documented in the List of Daily Workers. Refer document no.ST 03. Reviewed the List of Daily Workers.  In the employee master list stated the information as follows:	Complied	
	job description, wage and the period of employment.	Name		
	- Major compliance -	Date of Birth		
		ID no.		
		Nationality		
		Commenced date		
		Service end date		
		Workstation		
		Type of work		
		Category of work		
4.4.5.6	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.	All workers were provided with fair contracts. The contracts has been brief to the employee before signed by both employer and employee and a witness. Copy of contract were available for review in the state office. Reviewed sample employment contracts as follows:	Complied	
	- Major compliance -	B4148306 signed on 07/11/2016		



Criterio	n / Indicator	Assessment Findings	Compliance
		C0264400 signed on 21/01/2019	
		B0091809 signed on 02/01/2019	
		AT234816 signed on 02/01/2019	
		AT5336718 signed on 02/01/2019	
		AU200406 signed on 02/01/2019	
		AU055385 signed on 02/01/2019	
		B4435155 signed on 04/05/2017	
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.  - Major compliance -	- Check roll and Pay slip for month of March, April May 2020 (3 harvesters, 3 sprayers, 2 general workers, 2 securities)	Complied
		The estate implement the checkroll system to records the working hours for all workers. Verified the working hours and overtime data in checkroll, and payslips found all the data were consistent. Reviewed the data of check roll and pay slip for month of March, April and May 2020 for employee as follows:	
		B4148306	
		C0264400	
		B0091809	
		AT234816	
		AT5336718	
		AU200406	
		AU055385	
		B4435155	



Criterior	n / Indicator	Assessment Findings	Compliance
4.4.5.8	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.  - Major compliance -	Based on the agreement, Working hours is 8 hours. From Monday to Saturday. Total monthly working hours is 208 hours. The overtime maximum is 104 hours according to the Sarawak Labour Ordinance.	Complied
		The overtime rate after 8 hours daily rated is: (general workers/upkeep/maintenance)	
		- Mon - Sat - daily rated / 8 hours x 1.5	
		- Sunday - daily rated / 8 hours x 2.0	
		- Public holiday – daily rated / 8 hours x 3.0	
		The overtime rate after 8 hours piece rated is: (harvesters)	
		- Mon - Sat – flat rate	
		- Sunday – flat rate x 2.0	
		- Public holiday – flat rate x 3.0	
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.	Salary slips clearly shows the calculations of gross salary, all deductions and net salary of a worker. Workers interviewed confirmed that they are being paid more than the stipulated minimum wage and	Complied
	- Major compliance -	that they understand all the deductions being made.	
4.4.5.10	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.  - Minor compliance -	The management provided free medical facilities to all the workers and dependents. The company also subsidized water and electricity to all the employee.	Complied
		New employees arriving from overseas are given the basic necessities and food and a return air tickets each for a contracted period.	
4.4.5.11	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	As minimum, line site inspection has been conducted by site safety officer in 3 monthly basis. Inspection has yet to be conducted as the annual inspection plan. As for Sarawak, Workers' Minimum Standards	Complied



Criterion	/ Indicator	Assessment Findings	Compliance
	Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.  - Major compliance -	Housing and Amenities Act 1990 (Act 446) is not applicable. Refer to letter from Labour Department, ref. no.: JTKSWK/DA/(S)18 JLD 3 (27) dated 15/5/18.	
	Trajer compilation	Sighted during site visit at the linesite, the workers housing were found clean and conducive conditions. The old wooden house were in progress to be replace with new concrete house.	
4.4.5.12	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.	The company has established policy on sexual harassment and violence at workplace as follows:	Complied
	- Major compliance -	Sexual Harassment Policy. Refer document no. PGHSB/SOPP/012/2017, Rev. 02, dated 05/05/2017	
		Women Rights Policy. Refer document no. PGHSB/SOPP/013/2017; Rev. 02, , dated 05/05/2017	
		The policy were communicated to all workers during morning muster briefing and displayed at several designated places in the estate.	
4.4.5.13	The management shall respect the right of all employees to form or join trade union and allow workers own	The company has established policy for the right of all employees to form or join trade union as follows:	Complied
	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	Freedom of Association & Collective Bargaining Policy. Refer document no. PGHSB/SOPP/009/2017, Ver. 02, dated 05/05/2017	
	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	The policy were communicated to all workers during morning muster briefing and displayed at several designated places in the estate.	
	discriminated against or suffer repercussions.  - Major compliance -	The estate has established Joint Consultative Committee. Reviewed the minutes of JCC and Estate Management Meeting dated 15/08/2020.	



Criterion	/ Indicator	Assessment Findings	Compliance
4.4.5.14	The minimum age shall comply with local, state and national	The company has established labour policy and child labour policy as follows:	Complied
	i iaitiiv iaitiis, uliuel auuli subelvisioti, allu wileti liot liitelletiilu l	Employment Policy. Refer document no. PGHSB/SOPP/011/2016, Ver. 01, dated 22/02/2016	
	working conditions Major compliance -	Child Labour Policy. Refer document no. PGHSB/SOPP/005/2016, Ver. 02, dated 05/05/2017	
		Based on the employee masterlist and interview with the workers, no evidence of person below 18 years old were employed by the estate.	
Criterion	4.4.6: Training and competency		
4.4.6.1	All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.  - Major compliance -	Palmgroup Holdings has established Guidelines on training Procedure. Refer document no. PGHSP/SOPP/004/2018 9 (2019-02) rev. no. 2 dated May 2019.	Complied
		The estate has established training program base on training need analysis conducted and documented in Executive, Staff and Workers Annual Training Program Schedule FY 2020. Sighted the sampled training records follows:	
		Chemical mixing and triple rinsing training dated 28/01/2020	
		SSOP for chemical spraying (herbicide and pesticide) dated 10/01/2020 and 11/02/2020	
		SSOP for manuring dated 06/02/2020	
		PPE training for chemical handling and fertilizer applicator/repacking training dated 11/01/2020	
		SSOP FFB harvesting/cut and prune with parang and PPE training dated 17/02/2020	

...making excellence a habit.™



Criterio	n / Indicator	Assessment Findings	Compliance	
		Safety and Health Policy briefing dated 06/01/2020		
		SSOP for prevent bite and sting training dated 17/02/2020		
		SSOP for lorry or farm tractor (transport FFB) training dated 22/01/2020		
		SSOP for water treatment plan dated 21/02/2020		
		Riparian bufferzone training dated 01/08/2020		
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.		Complied	
	- Major compliance -			
4.4.6.3	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.	The estate continuously provided the training to the workers as per plan. The training plan was reviewed on annually basis base on the training need analysis conducted.	Complied	
	- Minor compliance -			
4.5 Prin	ciple 5: Environment, natural resources, biodiversity	and ecosystem services		
Criterio	n 4.5.1: Environmental Management Plan			
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.  - Major compliance -	The company has established Environmental Policy signed by the Managing Director dated on 21/11/2016. In the policy stated the company commitment to conduct all operation and activities in an environmentally responsible manner and to continually improve environmental performance within plantation.	Complied	



Criterio	n / Indicator	Assessment Findings	Compliance
		The policy was communicated to all the employee through briefing, training and displayed on signboard at designated place at the estate.	
4.5.1.2	The environmental management plan shall cover the following: An environmental policy and objectives; The aspects and impacts analysis of all operations.  - Major compliance -	The estate has conducted the environmental aspects and impacts analysis of all main and support operations and documented in Identification and Significance Determination of Environmental aspects and Setting Objectives and Targets. The assessment was conducted on annually basis.  Base on the significant impacts identified in the register, the estate has established Environmental Continual Improvement Plan.	Complied
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.	Base on the significant impacts identified in the register, the estate has established Environmental Continual Improvement Plan. Sighted the implementation of the management plan as follows:	Complied
	- Major compliance -	Environmental and BMP meeting was conducted on quarterly basis. Reviewed the minutes meeting dated 09/06/2020	
		Waste water from chemical pre-mixing activity was collected in collection sump and reuse into the pre-mixing.	
		The estate continuously create awareness for the on company environmental policy. Reviewed the training records for domestic waste management dated 17/01/2020, prohibition on open burning dated 24/02/2020 and prohibition of illegal hunting dated 24/02/2020.	
		The estate conducted and submitted the Environmental Monitoring Report to NREB on quarterly basis. Reviewed the report for 1 <sup>st</sup> and 2 <sup>nd</sup> quarter 2020. Refer report no NREB/6-1/20/40.	
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan.	Program to promote positive impacts was documented in the environmental continual improvement plan such as:	Complied
	- Minor compliance -	No spraying along the buffer zone.	

…making excellence a habit.<sup>™</sup>



Criterio	n / Indicator	Assessn	ment Findings			Compliance
		Maintain roads.	cover crop, soft v	weeds on the s	slope of drains, bunds and	
		No domes	stic waste burning			
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.	document	ted in annual trair	ning program	m for all the employee and The training plan , Policies, onmental control procedure	Complied
	- Major compliance -					
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.	The estate has established the Environmental and BMP Committee. The committee held meeting on quarterly basis. Reviewed the minutes				Complied
	- Major compliance -	meeting dated 09/06/2020.				
Criterio	<b>1 4.5.2:</b> Efficiency of energy use and use of renewable energy	Jy				
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		wable energy and	I documented i	plan to assess the usage of in GHG Monitoring Plan to plan established as follows:	Complied
	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.	Provide tray to reduce oil spillage and leakage				
	- Major compliance -	Service m	achinery/vehicles	on time		
		The estat				
		Month	2020			
			Consumption	Baseline		
		Jan	5.20	11.45		

…making excellence a habit.™



Criterio	n / Indicator	Assessment Findings						Compliance
		Feb			12.28			
		Mar		35	10.29			
		Apr May		19 83	9.14 8.08			
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.	The e	estimate estimate	of diese	el usage was do was used as l		ne annual budget. nitor the usage of n.	Complied
	- Major compliance -							
4.5.2.3	The use of renewable energy should be applied where possible.	No re	enewable	e energy	used in the est	ate.		Complied
	- Minor compliance -							
Criterio	n 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 -	docur	mented	in the		tory (Waste N	d its source and Management and	Complied
		i. Dor	mestic W	/aste				
		ii. Scheduled Waste – SW 102, SW 305, SW 306, SW 307, SW 409 (Empty pesticide container).						
		Recycle Waste						
		#	Faci	ility	Nature of Waste	Environment Hazard Category	Designated Scheduled Waste (ID No)	



Criterion / Indicator		essment Fin		Compliance		
	1	Office & Grace Apartment	Domestic Waste	unhealthy to tenants	Bin 10	
	2	Workshop	Schedule Waste/Scrap Metal	Acute toxicity	NIL	
	3	Workshop	Schedule Waste/Spent lubricant oil	Acute toxicity	SW305	
	4	Workshop	Schedule Waste/Filter	Acute toxicity	SW410	
	5	Store / Fertilizers	Empty Fertilizers Bags	Pollution	In progress	
	6	Store / Chemicals	Empty Chemicals Containers [UPPCR]	Pollution	In progress	
	7	Labour Line	Domestic Waste	unhealthy to tenants	Bin 1 - 9	
	8	Main Genset Room	Schedule Waste/Spent lubricant oil	Acute toxicity	SW305	
	9	Main Genset Room	Schedule Waste/Filter	Acute toxicity	SW410	



Criterion / Indicator			essment Find	lings			Compliance
		10	Weightbridge	Domestic Waste	unhealthy to tenants	Bin 16	
		11	Staff Quarters	Domestic Waste	unhealthy to tenants	Bin 11 - 12	
		12	Diesel Tank House	Schedule Waste	Acute toxicity	SW 02	
		13	Security Post & Quarters	Domestic Waste	unhealthy to tenants	Bin 15	
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:  Identifying and monitoring sources of waste and pollution  Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products  - Major compliance -	Waste management plan has been established base on waste identified and documented in Environmental Continual Improvements Plan under section Domestic Waste Management and Schedule Waste Management. The management plan was reviewed on annually basis. Sighted the implementation of the management plan as follow:  Chemical containers were triple rinsing and disposed as recycle items. Sighted the chemicals containers logbook  The estate monitor the domestic generated. Sighted the monitoring records as todated FY 2020. Domestic waste was collected and disposed at the Selangau municipal landfill.					Complied
4.5.3.3	The management shall establish Standard Operating 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.  - Major compliance -	docu Refe Sche by lice	mented in Schor document no. duled waste was	eduled Waste PGHSB/SOPP/0 s stored at desi ors. Sighted the	Handling and S 14/2016 dated 2 gnated storage a	aste Handling and storage Guidance. 1/11/2016. area and disposed WISS and sampled	Complied

...making excellence a habit.™



n / Indicator	Assessment Findings	Compliance	
	18/06/2020 for SW 410, C/N no. 2020061816NJWPZQ		
	04/06/2020 for SW 305, C/N no. 202006041094OS1E		
	15/06/2020 for SW 410, C/N no. 2020061512LR0OK1		
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.	Empty pesticide containers was punctured and disposed through licensed contractors as stated in Scheduled Wastes Handling and Storage Guidance, PGHSB/SOPP/014/2016, ver 1, dated 21/11/2016. The empty chemical containers triple rinsed, punctured and stored in designated storage area under locked and key.	Complied	
- Major compliance -			
Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.  - Minor compliance -	Domestic waste was collected and disposed at the Selangau municipal landfill. Sighted the collection records for the month of January to June 2020.	Complied	
<b>n 4.5.4:</b> Reduction of pollution and emission			
An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.	The estate has conducted assessment to identify all polluting activities and documented in the GHG Monitoring Plan to Reduce GHG Emission. Source of activities contribute to GHG emission identified as follows:	Complied	
- Major compliance -	Machinery/Vehicle		
	Monthly diesel and fuel consumption		
	Provide tray to reduce oil spillage and leakage		
	Service all machineries/vehicles on time		
	Generators		
	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.  - Major compliance -  Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.  - Minor compliance -  1.4.5.4: Reduction of pollution and emission  An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.	18/06/2020 for SW 410, C/N no. 2020061816NJWPZQ 04/06/2020 for SW 305, C/N no. 202006041094OS1E 15/06/2020 for SW 410, C/N no. 2020061512LR0OK1  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.  - Major compliance -  Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.  - Minor compliance -  Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.  - Minor compliance -  14.5.4: Reduction of pollution and emission  An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.  - Major compliance -  Major compliance -  The estate has conducted assessment to identify all polluting activities and documented in the GHG Monitoring Plan to Reduce GHG Emission. Source of activities contribute to GHG emission identified as follows:  Machinery/Vehicle  Monthly diesel and fuel consumption  Provide tray to reduce oil spillage and leakage  Service all machineries/vehicles on time	



Criterio	n / Indicator	Assessment Findings	Compliance
		Monthly diesel and fuel consumption	
		Service all machineries/vehicles on time	
		Fertilizers	
		To monitor and register all fertilizer consumption	
		Chemicals	
		Plant more beneficial plant at every phase	
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented.	The estate has established GHG Monitoring Plan to Reduce GHG Emission based on the assessment conducted. Sighted the	Complied
	- Major compliance -	implementation of the management plan as follows:	
	. lujoi compilance	The estate monitor the fuel consumption on monthly basis. Reviewed the data todate FY 2020.	
		The estate maintain records for diesel consumption for each tractors, machineries, vehicles and genset in Machinery Use Record. Refer doc no. ET07. Reviewed the diesel usage data as at July 2020.	
Criterio	n 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:	The company has established guidelines on Water Use Monitoring. Refer doc. no. PGHSB/SOPP/004/2015, dated 21/12/2015. The guidelines established to monitor water use in a plantation in order to ensure water availability for communities.	Complied
	Assessment of water usage and sources of supply.	The estate has established riparian bufferzone for Sg. Sikat and Sg.	
	Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities.	Batang Mukah. Noted during site visit, no evidence of chemical application along the bufferzone as sighted at Road R36A. The vegetation along the bufferzone were well established. Noted during interview with the sprayer, the understanding on prohibition on	

…making excellence a habit.™



Criterion	n / Indicator	Assessment Findings	Compliance
	Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).	chemical application along the bufferzone is satisfactory. Signboard on prohibition of chemical application has been erected along the bufferzone.	
	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.	The estate has established Water Supply Management Plan and Peat Management Control Plan. The plan focusing on ensure water availability for communities and maintain the water level at the peat area.	
	Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.	The estate has install water level indicator in the estate. The estate monitor the water level on daily basis to ensure the water level at optimum level of 50 – 70 cm from the surface.	
	Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.	The estate prohibited the sprayers to do chemical application ant the estate main drain. Reviewed the training records dated 01/08/2020	
	- Major compliance -	The estate conducted and submitted the Environmental Monitoring Report to NREB on quarterly basis. Reviewed the report for 1 <sup>st</sup> and 2 <sup>nd</sup> quarter 2020. Refer report no NREB/6-1/20/40.	
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.	No construction of bunds, weirs and dams across Sg. Sikat.	Complied
	- Minor compliance -		
4.5.5.3	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).	All houses were provided with 2 units of 400 gallons water tanks to harvest rain water.	Complied
	- Minor compliance -		
Criterion	4.5.6: Status of rare, threatened, or endangered species ar	nd high biodiversity value	



Criterior	ı / Indicator	Assessment Findings	Compliance
4.5.6.1	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:	The estate has conducted High Conservation Value Assessment by Wild Asia as per final reports 21/12/2018. In the reports, potential HCV 1, HCV 4 and HCV 5 was identified in the estate.	Complied
	Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.	In the assessment, potential of HCV 1 is identified. The potential RTE Species identified and IUCN, RTE and Cites 9 status was listed in table 38: Pelita Sikat HCV 1 Species.	
	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.		
	- Major compliance -		
4.5.6.2	If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for	The potential RTE Species identified and IUCN, RTE and Cites 9 status was listed in table 38: Pelita Sikat HCV 1 Species.	Complied
	management planning and operations should include:  Ensuring that any legal requirements relating to the protection of the species are met.  Discouraging any illegal or inappropriate hunting, fishing or	The estate has established management plan for RTE species and documented in Environmental Management Plan under Flora and Fauna or RTE section and HCV Goals. Sighted the implementation of the management plan as follows:	
	collecting activities; and developing responsible measures to resolve human-wildlife conflicts.	The estate has erected signboard on prohibition of illegal hunting the estate entrance, HCV area and linesite. Noted during interview with	
	- Major compliance -	workers and stakeholders, the understanding on prohibition of illegal hunting was satisfactory.	
		The estate continuously provide training to ensure awareness among the workers on RTE. Reviewed the training records dated 24/02/2020.	



n / Indicator	Assessment Findings	Compliance
	RTE monitoring was recorded in the RTE Log Book. In the log book recorded the date, name or reporter, name of RTE and location the RTE sighted.	
A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.	The estate has established management plan to comply with Indicator 1 as stated in indicator 4.5.6.3.	Complied
- Major compliance -		
1 4.5.7: Zero burning practices		
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.	The company has established Zero Burning Policy signed by the Managing Director dated 21/7/2015. The policy was communicated to all the employee through training, briefing and signage at several	Complied
- Major compliance -	notice board in the estate.	
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.	No controlled burning application is allowed as per Zero Burning Policy	Complied
- Major compliance -		
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.	No controlled burning application is allowed as per Zero Burning Policy	Complied
- Major compliance -		
Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.  - Minor compliance -	No controlled burning application is allowed as per Zero Burning Policy No replanting activity is planned within 5 years since this estate has planting the oil palm in year 2007 first planting.	Complied
	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.  - Major compliance -  1 4.5.7: Zero burning practices  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.  - Major compliance -  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 -  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 -  Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.	RTE monitoring was recorded in the RTE Log Book. In the log book recorded the date, name or reporter, name of RTE and location the RTE sighted.  A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.  - Major compliance -  14.5.7: Zero burning practices  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.  - Major compliance -  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 -  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 -  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 application is allowed as per Zero Burning Policy No replanting activity is planned within 5 years since this estate has planting the oil palm in year 2007 first planting.



Criterio	n / Indicator	Assessment Findings	Compliance
4.6 Prin	ciple 6: Best Practices		
Criterio	n 4.6.1: Site Management		
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.  - Major compliance -	Addressed in "Policy and BMP". Established based on operation such as i. Oil Palm Harvesting [001, 27/7/13] ii. Oil Palm Frond Pruning [001, 20/9/13] iii. Control of Tirathaba Bunch Moth [PGHSB/BMPP/002/2014, 2/5/14] iv. Water Management in Peat Soil [PGHSB/BMPP/004/2014, 1/7/14] v. Weeding [PGHSB/BMPP/005/2014, 1/7/14] vi. Termite Management in Peat Soil [PGHSB/BMPP/001/2014, 1/7/14] vii. IPM in Oil Palm Agro-ecological System [PGHSB/BMPP/007/2014, 14/7/14] viii. Fertilizer Management [PGHSB/BMPP/006/2014, 14/7/14] ix. Oil Palm Nursery Management [PGHSB/BMPP/003/2014, 1/7/14] x. Rat Management in Oil Palm Plantation [PGHSB/BMPP/08/2015, 11/8/2015] To check on the consistent implementation of the SOP, internal agronomy team will visit estate minimum twice per year to monitor the P&D programme and overall field condition.	Complied
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		Complied



Criterio	n / Indicator	Assessment Findings	Compliance
	contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.		
	- Major compliance -		
4.6.1.3	A visual identification or reference system shall be established for each field.	Identification of field reference was mainly made of plastic plat with	Complied
		white font on black background. The plat has the information about Block number, road number, year planted, SPH, Ha and planting	
	- Major compliance -	material.	
Criterio	n 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.	Business plan was demonstrated through availability of annual budget with 2 years projection. Among the main items included in the annual budget were harvesting and evacuation, field upkeep and employees	Complied
	- Major compliance -	welfare.	
4.6.2.2	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.	No replanting activity is planned within 5 years since this estate has planting the oil palm in year 2007 first planting.	Complied
	- Major compliance -		
4.6.2.3	The business or management plan may contain:	The annual budget of the estate contains the information about crop	Complied
	Attention to quality of planting materials and FFB	projection, production cost and estimation of material price. The managers will have regular meeting with the top management to	
	Crop projection: site yield potential, age profile, FFB yield trends	discuss about their estate's performance and expenses in order to	
	Cost of production : cost per tonne of FFB	ensure efficiency of cash flow.	
	Price forecast		
	e) Financial indicators : cost benefit, discounted cash flow, return on investment		

…making excellence a habit.™



Criterio	ı / Indicator	Assessment Findings	Compliance
	- 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.	Management has the working sheet for all the field operation for realization. Sampled the sanitation schedule on monthly basis by manager for implementation of profit and loss monitoring.	Complied
	- Major compliance -		
Criterio	1 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.	Pricing mechanisms for the products and other services were effectively documented and implemented as per following example:	Complied
	- Major compliance -	Ref. contract work agreement no. PSSB/NC20010009 between Palmraya Pelita Sikat Plantation Sdn. Bhd. and Deni Tamrin dated 01/01/2020.	
		Pricing mechanism is based on rate per RM/ton at specific work target/field.	
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.	Ref. contract work agreement no. PSSB/NC20010009 between Palmraya Pelita Sikat Plantation Sdn. Bhd. and Deni Tamrin dated	Complied
	- Major compliance -	01/01/2020.	
		Noted during the interview with the contractors, all the contract payments have been made accordingly in timely manners.	
Criterio	1 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.	MSPO training for contractor has been conducted which attended by 1 contractor, Deni Tamrin during contract signing on 01/01/2020.	Complied
	- Major compliance -		



Criterion / Indicator		Assessment Findings	Compliance
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor.  - Major compliance -	Ref. contract work agreement no. PSSB/NC20010009 between Palmraya Pelita Sikat Plantation Sdn. Bhd. and Deni Tamrin dated 01/01/2020.	Complied
		The above contract is valid for 12 month until 31/12/2020.	
		Signature of the manager for estate and contractor evident in the agreement in 01/01/2020.	
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.	The company has no objection to allow BSI auditors to verify the assessment through physical inspection if required.	Complied
	- Minor compliance -	The estate has issued an official Adoption Letter for Malaysian Sustainable Palm Oil. In the letter stated:	
		Contractor shall understand MSPO requirements and compliance where applicable;	
		2. Contractor shall comply with the applicable laws and regulations;	
		3. Employees are paid based on legal or industry minimum standards according to agreed employment contract;	
		4. Children and young persons shall not be employed;	
		5. To ensure all employees are appropriately trained based on their job application;	
		6. Continual improvement in the main social, environment impact and opportunities for the company.	
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.	ragement shall be responsible for the observance of the oints applicable to the tasks performed by the contractor, king and signing the assessment of the contractor for	



Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.7 Prin	ciple 7: Development of new planting		
Criterio	n 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.	No development of new planting in the estate.	N/A
	- Major compliance -		
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.	No development of new planting in the estate.	N/A
	- Major compliance -		
Criterio	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.	No development of new planting in the estate.	N/A
	- Major compliance -		
Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA		Å)	
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations.	No development of new planting in the estate.	N/A



Criterio	n / Indicator	Assessment Findings	Compliance
	- Major compliance -		
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.		N/A
	- Major compliance -		
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.	No development of new planting in the estate.	N/A
	- Major compliance -		
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.	No development of new planting in the estate.	N/A
	- Minor compliance -		
Criterio	n 4.7.4: Soil and topographic information		1
4.7.4.1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation.	No development of new planting in the estate.	N/A
	- Major compliance -		
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure.		N/A
	- Major compliance -		



Criterio	n / Indicator	Assessment Findings	Compliance
Criterio	n 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.	No development of new planting in the estate.	N/A
	- Major compliance -		
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.	No development of new planting in the estate.	N/A
	- Major compliance -		
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion.	No development of new planting in the estate.	N/A
	- Major compliance -		
Criterio	n 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.	No development of new planting in the estate.	N/A
	- Major compliance -		
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites.	No development of new planting in the estate.	N/A
	- Minor compliance -		



Criterio	n / Indicator	Assessment Findings	Compliance
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.	No development of new planting in the estate.	N/A
	- Major compliance -		
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.	No development of new planting in the estate.	N/A
	- Major compliance -		
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented.	No development of new planting in the estate.	N/A
	- Major compliance -		
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented.		N/A
	- Major compliance -		
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available.	No development of new planting in the estate.	N/A
	- Major compliance -		
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.	No development of new planting in the estate.	N/A
	- Minor compliance -		



#### **Appendix B: List of Stakeholders Contacted**

Government Officer:	Community/neighbouring village:	
N/A	TR. Badi Lubok Bemban	
Suppliers/Contractors/Vendors:	Worker's Representative/Gender Committee:	
Hong Sing Teck	Estate manager	
	Supervisors, Staff & Clerks	
	Estate local & foreign workers (harvesters, sprayers, etc.)	
	Local workers representatives	
	Foreign workers representatives	
	Gender committee representative	
	Estate Hospital Assistant	



#### **Appendix C: Smallholder Member Details**

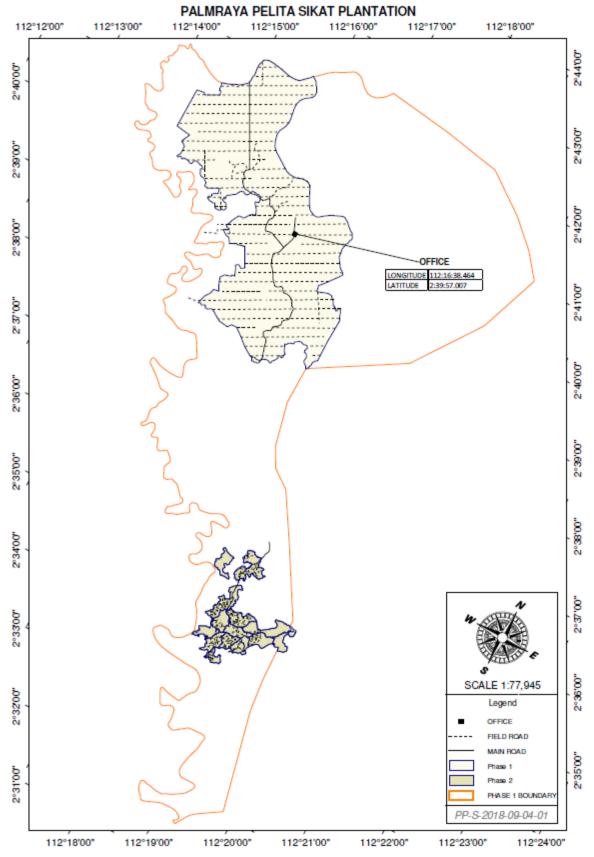
No.	Smallhold	ler	Location of	GPS	Certified	Planted
	Name	MPOB License Number	Planted Area (District)	Coordinates	Area (ha)	Area (ha)
	N/A					



#### **Appendix D: Location and Field Map**









#### **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