

**MALAYSIAN SUSTAINABLE PALM OIL  
2<sup>nd</sup> ANNUAL SURVEILLANCE ASSESSMENT (ASA2)  
Public Summary Report**

<b>Seong Thye Plantations Sdn Bhd</b>
Client company Address: Suite 2B-3A-2, Block 2B, Level 3A Plaza Sentral, Jalan Stesen Sentral 5 50470 KL Sentral Kuala Lumpur, Malaysia
Certification Unit: Ladang Rompin POM and Ladang Padang POM & Ladang Rompin, Ladang Padang and Ladang Viva
Location of Certification Unit: 1) Ladang Rompin POM and Ladang Rompin: Lot 5082, Mukim Rompin, Pahang, Malaysia 2) Ladang Padang POM and Ladang Padang: Lot 3222, Mukim Kahang, Kluang, Johor, Malaysia 3) Ladang Viva: Lot 2274-2288 & Lot 2289-2293, Mukim Mersing, 86800 Mersing, Johor, Malaysia

**Report prepared by:**  
**Nor Halis Abu Zar** (Lead Auditor)

**Report Number: 3293268**

**Assessment Conducted by:**  
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## Section 1: Executive Summary

<b>1.1 Organizational Information and Contact Person</b>			
Company Name	Seong Thye Plantations Sdn Bhd		
Mill/Estate	MPOB License No.	Expiry Date	
	Ladang Rompin Palm Oil Mill: 500216104000	31/05/2022	
	Ladang Padang Palm Oil Mill: 500014104000	31/03/2022	
	Ladang Rompin: 502448202000	30/09/2021	
	Ladang Padang: 501483502000	31/03/2022	
	Ladang Viva: 604220002000 & 554065101000	31/10/2021 & 31/10/2025	
Address	Suite 2B-3A-2, Block 2B, Level 3A, Plaza Sentral, Jalan Stesen Sentral 5, 50470 KL Sentral, Kuala Lumpur, Malaysia		
Certification Unit	Ladang Padang Palm Oil Mill & Ladang Rompin Palm Oil Mill		
Contact Person Name	Ng Yeen Chern / Pua Siew Onn		
Website	-	E-mail	sopua@sinthye.com
Telephone	03-2261 4633	Facsimile	03-2261 4733

<b>1.2 Certification Information</b>			
Certificate Number	Mills: MSPO 712226 Plantations: MSPO 712227		
Issue Date	26/06/2019	Expiry date	25/06/2024
Scope of Certification	Mill: Production of Sustainable Palm Oil and Palm Oil Products Estate: Production of Sustainable Oil Palm Fruits		
Standard	<ol style="list-style-type: none"> <li>MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Oil Palm Plantations and Organized Smallholders</li> <li>MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mills</li> </ol>		
Stage 1 Date	08-10/05/2019		
Stage 2 / Initial Assessment Visit Date (IAV)	08-31/05/2019		
Extension of Scope	12-13/12/2019		
Continuous Assessment Visit Date (CAV) 1	15-19/06/2020		
Continuous Assessment Visit Date (CAV) 2	07-11/06/2021		
Continuous Assessment Visit Date (CAV) 3	-		
Continuous Assessment Visit Date (CAV) 4	-		
<b>Other Certifications</b>			

Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 720132	MSPO SCCS	BSI Services Malaysia Sdn. Bhd.	10/11/2024

**1.3 Location of Certification Unit**

Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Latitude	Longitude
Ladang Rompin POM	Lot 5082, Mukim Rompin, Pahang, Malaysia	2.94013	103.245259
Ladang Rompin	Lot 5082, Mukim Rompin, Pahang, Malaysia	2.94013	103.245259
Ladang Padang POM	Lot 3222, Mukim Kahang, Kluang, Johor, Malaysia	2.31025	103.529222
Ladang Padang	Lot 3222, Mukim Kahang, Kluang, Johor, Malaysia	2.31025	103.529222
Ladang Viva	1) Viva - Splendid Sdn Bhd Lot 2274-2288, Mukim Mersing, 86800 Mersing, Johor, Malaysia 2) Maxi - Universal Sdn Bhd Lot 2289-2293, Mukim Mersing, Derah Mersing, Johor, Malaysia	2.32368	103.82978

**1.4 Certified Area**

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Ladang Rompin	2,998.00	-	42.62	3,040.62	98.60%
Ladang Padang	2,194.00	-	32.00	2,226.00	98.56%
Ladang Viva	80.06	-	0.40	80.46	99.50%
<b>TOTAL</b>	<b>5,272.06</b>	-	<b>75.02</b>	<b>5,347.08</b>	<b>98.60%</b>

**1.5 Plantings & Cycle**

Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Ladang Rompin	523.00	1,063.00	2.00	-	1,410.00	2,475.00	523.00
Ladang Padang	-	-	1,360.25	833.75	-	2,194.00	-
Ladang Viva	-	80.06	-	-	-	80.06	-
<b>Total (ha)</b>	<b>523.00</b>	<b>1,143.06</b>	<b>1,362.25</b>	<b>833.75</b>	<b>1,410.00</b>	<b>4,749.06</b>	<b>523.00</b>

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<b>1.6 Certified Tonnage of FFB</b>			
<b>Estate</b>	<b>Tonnage / year</b>		
	<b>Estimated (July 2020 - June 2021)</b>	<b>Actual (June 2020 - May 2021)</b>	<b>Forecast (July 2021 - June 2022)</b>
Ladang Rompin	49,266.00	50,798.29	52,445.00
Ladang Padang	52,000.00	59,125.190	58,000.00
Ladang Viva	1,060.00	1,021.46	1,410.00
Outside Crop- Ladang Rompin	0.00	37,940.78	34,790.00
Outside Crop- Ladang Padang	0.00	19,269.370	20,000.00
<b>Total</b>	<b>102,326.00</b>	<b>168,155.09</b>	<b>166,645.00</b>

<b>1.7 Uncertified Tonnage of FFB</b>			
<b>Estate</b>	<b>Tonnage / year</b>		
	<b>Estimated (July 2020 - June 2021)</b>	<b>Actual (June 2020 - May 2021)</b>	<b>Forecast (July 2021 - June 2022)</b>
Outside Crop- Ladang Rompin	34,834.00	21,348.09	20,000.00
Outside Crop- Ladang Padang	100,000.00	22,176.77	30,000.00
<b>Total</b>	<b>134,834.00</b>	<b>43,524.86</b>	<b>50,000.00</b>

<b>1.8 Certified Tonnage - Part 4 of MS2530 - (Ladang Rompin POM)</b>			
	<b>Estimated (July 2020 - June 2021)</b>	<b>Actual (June 2020 - May 2021)</b>	<b>Forecast (July 2021 - June 2022)</b>
	<b>Mill Capacity: 30 MT/hr</b>	<b>FFB</b>	<b>FFB</b>
	50,326.00	88,739.07	87,235.00
<b>SCC Model: MB</b>	<b>CPO (OER: 20.00%)</b>	<b>CPO (OER: 20.15%)</b>	<b>CPO (OER: 20.25%)</b>
	10,065.20	17,886.74	17,665.09
	<b>PK (KER: 5.10%)</b>	<b>PK (KER: 4.82%)</b>	<b>PK (KER: 5.00%)</b>
	2,566.63	4,278.28	4,361.75

Note: FFB supplied from Ladang Rompin and Outside Crop Ladang Rompin. Ladang Viva was sent FFB to 3<sup>rd</sup> Party Mill

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<b>1.9 Certified Tonnage CPO - Part 4 of MS2530 - (Ladang Padang POM)</b>			
	<b>Estimated (July 2020 - June 2021)</b>	<b>Actual (June 2020 - May 2021)</b>	<b>Forecast (July 2021 - June 2022)</b>
	<b>FFB</b>	<b>FFB</b>	<b>FFB</b>
<b>Mill Capacity: 20 MT/hr</b>	52,000.00	78,394.56	78,000.00
	<b>CPO (OER: 19.30%)</b>	<b>CPO (OER: 18.39%)</b>	<b>CPO (OER: 19.00%)</b>
<b>SCC Model: MB</b>	10,036.00	14,418.52	14,820.00
	<b>PK (KER: 5.50%)</b>	<b>PK (KER: 5.74%)</b>	<b>PK (KER: 5.50%)</b>
	2,860.00	4,497.00	4,290.00

Note: FFB supplied from Ladang Padang and Outside Crop Ladang Padang.

<b>1.10 Actual Sold Volume (CPO)</b>					
<b>CPO (MT)</b>	<b>MSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>RSPO</b>		
Ladang Rompin POM 17,886.74	-	-	-	17,886.74	17,886.74
Ladang Padang POM 14,418.52	-	-	-	14,418.52	14,418.52

<b>1.11 Actual Sold Volume (PK)</b>					
<b>PK (MT)</b>	<b>MSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>RSPO</b>		
Ladang Rompin POM 4,278.28	-	-	-	4,278.28	4,278.28
Ladang Padang POM 4,497.00	-	-	-	4,497.00	4,497.00

## Section 2: Assessment Process

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

### Assessment Methodology, Programme, Site Visits

This full remote assessment was conducted due to Pandemic COVID-19 from 07-11/06/2021. The audit programme is included as Section 2.3. This remote audit has been conducted using Information and Communication Technologies including (Microsoft Teams, WhatsApp and phone call). The planned audit objectives have been achieved, there were no connectivity issues which adversely affected the audit. The approach to the audit was to treat the Seong Thye Plantations Sdn Bhd (Ladang Rompin POM and Ladang Padang POM) 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 and MS 2530-4:2013 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 smallholder's sample were determined following the MSPO Certification Requirement. The sampling of smallholders was based on the formula  $(r\sqrt{n})$ ; where  $r$  is the risk factor (may defer 1, 1.5 and 2 depending on risk), where  $n$  is total number of group members. The sampled smallholder listed in Appendix C.

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 remotely. Field workers were interviewed informally in small groups remotely. 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.

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

<b>Assessment Program</b>					
<b>Name (Mill / Plantation / Group smallholders)</b>	<b>Year 1 (Certification)</b>	<b>Year 2 (ASA 1)</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 3)</b>	<b>Year 5 (ASA 4)</b>
Ladang Rompin POM	✓	✓	✓	✓	✓
Ladang Rompin	✓	✓	✓	✓	✓
Ladang Padang POM	✓	✓	✓	✓	✓
Ladang Padang	✓	✓	✓	✓	✓
Ladang Viva	✓	✓	✓	✓	✓

**Tentative Date of Next Visit: June 7, 2022 - June 11, 2022**

**Total No. of Mandays: 18 mandays**

**2.1 BSI Assessment Team**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Nor Halis Abu Zar	Team Leader	He holds Bachelor of Science, Plantation Technology and Management, graduated from Universiti Teknologi Mara. 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, He had accumulated more than 6 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. He is a qualified Lead Auditor for MS2530:2013 and has accumulated more than 300 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia. He has completed ISO IMS 9001, 14001 Lead Auditor Course in January 2019, MSP0 2530:2013 Lead Auditor Course in February 2019 and endorsed RSPO Lead Auditor Course in October 2020. Fluent in Bahasa Malaysia and English Languages. During this assessment, he assessed on the aspects of legal, Traceability, Safety and Health, Environment, Best Practice and Business Plan.
Hafriazhar Mohd Mokhtar	Team Member	Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 9001, ISO 14001, ISO 45001 and ISO 50001 and has accumulated more than 1000 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the MSP0 & RSPO P&C and SCCS standards since 2011 and completed his MSP0 & RSPO P&C and SCCS Lead Assessor courses successfully. He has been involved in



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		RSPO audits within Malaysia, Papua New Guinea, Solomon Islands, Gabon, Nigeria and Pakistan. During this assessment, he assessed on the aspects of Legal, Policy. Social, Land Legal, Human Right and Contactors. Fluent in Bahasa Malaysia and English Languages.
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**2.2 Accompanying Persons**

No.	Name	Role
	Nil	

**2.3 Assessment Plan**

Date	Time	Subjects	(NHA)	(HMM)	ICT Planned
Thursday, 27/05/2021	1630 - 1700	Communication on document preparation - Audit plan - Any additional Information	√	√	Teleconference, Microsoft Team Meeting, Email
Monday, 07/06/2021 <b>Ladang Rompin POM</b>	0900 - 0915	Opening meeting - Opening presentation by audit team leader - Confirmation of assessment scope and finalize audit plan	√	√	Teleconference, Microsoft Team Meeting, Email
	0915 - 1030	Assessment and documentation review on mill best practice, legal requirements, OHS, environment and continual improvement	√		Teleconference, Microsoft Team Meeting, Email
	1030 - 1040	10-minute break	√		
	1040 - 1230	Assessment and documentation review on mill best practice, legal requirements, OHS, environment and continual improvement	√		Teleconference, Microsoft Team Meeting, Email
	1230 - 1330	Lunch & Break	√	√	Teleconference, Microsoft Team Meeting, Email
	1330 - 1450	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management		√	Teleconference, Microsoft Team Meeting, Email
	1450 - 1500	10-minute break		√	
	1500 - 1700	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management		√	Teleconference, Microsoft Team Meeting, Email
	1700 - 1730	Interim closing briefing	√		Teleconference, Microsoft Team Meeting, Email
Tuesday 08/06/2021 <b>Ladang Rompin</b>	0900 - 1030	Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement	√		Teleconference, Microsoft Team Meeting, Email

Date	Time	Subjects	(NHA)	(HMM)	ICT Planned
	1030 - 1040	10-minute break	√		
	1040 - 1230	Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement	√		Teleconference, Microsoft Team Meeting, Email
	1230 - 1330	Lunch & Break	√	√	Teleconference, Microsoft Team Meeting, Email
	1330 - 1450	Assessment and documentation review on social aspects, legal requirements, employees' welfare, and stakeholder management		√	Teleconference, Microsoft Team Meeting, Email
	1450 - 1500	10-minute break		√	
	1500 - 1700	Assessment and documentation review on social aspects, legal requirements, employees' welfare, and stakeholder management		√	Teleconference, Microsoft Team Meeting, Email
	1700 - 1730	Interim closing briefing	√	√	Teleconference, Microsoft Team Meeting, Email
Wednesday 09/06/2021 <b>Ladang Viva</b>	0900 - 1030	Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement	√		Teleconference, Microsoft Team Meeting, Email
	1030 - 1040	10-minute break	√		
	1040 - 1230	Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement	√		Teleconference, Microsoft Team Meeting, Email
	1230 - 1330	Lunch & Break	√	√	Teleconference, Microsoft Team Meeting, Email
	1330 - 1450	Assessment and documentation review on social aspects, legal requirements, employees' welfare, and stakeholder management		√	Teleconference, Microsoft Team Meeting, Email
	1450 - 1500	10-minute break		√	
	1500 - 1700	Assessment and documentation review on social aspects, legal requirements, employees' welfare, and stakeholder management		√	Teleconference, Microsoft Team Meeting, Email
	1700 - 1730	Interim closing briefing	√	√	Teleconference, Microsoft Team Meeting, Email

Date	Time	Subjects	(NHA)	(HMM)	ICT Planned
Thursday 10/06/2021 <b>Ladang Padang POM</b>	0900 - 1030	- Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement	√		Teleconference, Microsoft Team Meeting, Email
	1030 - 1040	- 10-minute break	√		
	1040 - 1230	- Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement	√		Teleconference, Microsoft Team Meeting, Email
	1230 - 1330	- Lunch & Break	√	√	Teleconference, Microsoft Team Meeting, Email
	1330 - 1450	- Assessment and documentation review on social aspects, legal requirements, employees' welfare, and stakeholder management		√	Teleconference, Microsoft Team Meeting, Email
	1450 - 1500	- 10-minute break		√	
	1500 - 1700	- Assessment and documentation review on social aspects, legal requirements, employees' welfare, and stakeholder management		√	Teleconference, Microsoft Team Meeting, Email
	1700 - 1730	- Interim closing briefing	√	√	Teleconference, Microsoft Team Meeting, Email
Friday 11/06/2021 <b>Ladang Padang</b>	0900 - 1030	- Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement	√		Teleconference, Microsoft Team Meeting, Email
	1030 - 1040	- 10-minute break	√		
	1040 - 1230	- Assessment and documentation review on good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement	√		Teleconference, Microsoft Team Meeting, Email
	1230 - 1330	- Lunch & Break	√	√	Teleconference, Microsoft Team Meeting, Email
	1330 - 1450	- Assessment and documentation review on social aspects, legal requirements, employees' welfare, and stakeholder management		√	Teleconference, Microsoft Team Meeting, Email
	1450 - 1500	- 10-minute break		√	
	1500 - 1700	- Assessment and documentation review on social aspects, legal requirements, employees' welfare, and stakeholder management		√	Teleconference, Microsoft Team Meeting, Email

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Date	Time	Subjects	(NHA)	(HMM)	ICT Planned
	1700 - 1730	Assessment team discussion and preparation of closing meeting and Closing Meeting	√	√	Teleconference, Microsoft Team Meeting, Email

### Section 3: Assessment Findings

#### 3.1 Details of audit results

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

- MSPO MS 2530-2:2013 – General Principles for Independent Smallholders
- MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized 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 no Major, 4 Minor non-conformity and no Opportunity of Improvements raised. The Seong Thye Plantations Sdn Bhd (Ladang Rompin POM and Ladang Padang POM)'s 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. Good relationship being maintained with surrounding communities.

<b>Minor Nonconformities:</b>		
<b>Ref:</b> <b>2066966-202106-N1</b>	<b>Area/Process: Ladang Rompin POM</b>	<b>Clause: 4.4.5.6 Part 4</b>
	<b>Issue Date: 11/06/2021</b>	<b>Due Date: Next Assessment</b>
Requirements:	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.	
Statement of Nonconformity:	Work agreement (Employment Contract) for sample employees not being fulfilled some of its conditions.	
Objective Evidence:	Ladang Rompin POM: Allowance entitlement as per Employment Contract clause 3 (e) not paid/reflective in payslip samples for following employees: 1) Durga Bahadur Magar (Oil Room Operator) 2) Bishwanath Chaudary (Kernel Operator)	
Corrections:	To revise the contract agreement to sign with the workers which will state that additional job will be provided by the management.	
Root cause analysis:	Payment was made for additional job and reflected in payslip for the 2 workers. However, offer of "additional jobs" was not reflected in the Employment Contract. The training on legal and documentation regarding contract agreement to the clerk was not effective.	
Corrective Actions:	To train the clerk on legal and documentation as per Employment Act 1955.	

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Verification	Corrective action plan accepted. The effectiveness of corrective action will be verified during next surveillance audit
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Minor Nonconformities:		
<b>Ref:</b> <b>2066966-202106-N2</b>	<b>Area/Process: Ladang Rompin</b>	<b>Clause: 4.4.5.6 Part 3</b>
	<b>Issue Date: 11/06/2021</b>	<b>Due Date: Next Assessment</b>
Requirements:	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.	
Statement of Nonconformity:	Work agreement (Employment Contract) for some sample employees shown employment period ended.	
Objective Evidence:	Ladang Rompin: Employment contract was expired for following employees: 1) Imnayahayati Binti Mohd Ali - Contract expired date: 31/12/2020 2) Roslan A/L Jimoi - Contract expired date: 31/12/2020 3) Rosnah A/P Bera - Contract expired date: 31/12/2020	
Corrections:	The Chief Clerk has now been assigned to review the schedule to ensure all renewal of employment contracts are followed up.	
Root cause analysis:	Schedule of expiry of employment contracts were maintained by the general clerk. However, no PIC was assigned to review and monitor the schedule regularly.	
Corrective Actions:	The Chief Clerk will provide a copy of the expiry dates of employees to the Estate Manager annually and will present an update on employment contract renewal semi-annually to the MSP0 Committee.	
Verification	Corrective action plan accepted. The effectiveness of corrective action will be verified during next surveillance audit	

Minor Nonconformities:		
<b>Ref:</b> <b>2066966-202106-N3</b>	<b>Area/Process: Ladang Padang</b>	<b>Clause: 4.4.5.4 Part 3</b>
	<b>Issue Date: 11/06/2021</b>	<b>Due Date: Next Assessment</b>
Requirements:	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.	
Statement of Nonconformity:	1) Work agreement (Employment Contract) for a sample contractor's employee shown employment period ended. 2) Salary not paid according to work delivered for a sample contractor's employee	
Objective Evidence:	Ladang Padang: 1) Employment contract was expired for Morad Hossen (Contractor: Nallian Enterprise) - Contract expired date: 15/4/2021 2) Salary payment for a sample worker name: Morad Hossen (Contractor: Nallian Enterprise) for his work on rest day dated 4/10/2020, 11/10/2020 & 18/10/2020 not paid/reflective in pay documents.	

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Corrections:	<p>1) The lapsed employment contact agreement had been renewed and signed by both parties.</p> <p>2) The incomplete pay record for the rest day work has been provided by the contractor to our office for filing</p>
Root cause analysis:	<p>1) Schedule of expiry of employment contracts were not maintained and monitored by the contractor and has caused the lapsed in employment contract with the worker. However, the work permit renewal was carried out on schedule.</p> <p>2) The pay record for rest day work was not available for review during the audit. The contractor did not submit the complete pay documentation to the office and the staff in charge did not perform a complete check on the documents submitted by the contractor.</p>
Corrective Actions:	<p>1) To better encourage contractor’s compliance with legal requirements, contractor’s annual appraisal will include such assessment of compliance. Secondly, Operating Unit have also requested all our contractors with effect from 1 July 2021, to provide us with a monthly checklist of worker permits and employment contract for our staff in charge to review. This would at least provide a forward view of expiring contracts and the staff assigned to review the contractor’s compliance would be able to follow up with the respective contractors on the state of their renewals.</p> <p>2.1 To avoid any potential confusion about worker’s pay, Operating Unit will require all contractors issue only one payslip to include normal day and rest day pay; rest day work pay will be integrated into all contractor’s payslips starting from 1 July 2021.</p> <p>2.2 To train the clerk on legal and documentation as per Employment Act 1955.</p>
Verification	Corrective action plan accepted. The effectiveness of corrective action will be verified during next surveillance audit.

Minor Nonconformities:		
<b>Ref:</b> <b>2066966-202106-N4</b>	<b>Area/Process: Ladang Rompin &amp; Ladang Padang</b>	<b>Clause: 4.4.5.11 Part 3</b>
	<b>Issue Date: 11/06/2021</b>	<b>Due Date: Next Assessment</b>
Requirements:	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.	
Statement of Nonconformity:	Supply of water not fully in compliance with applicable requirements.	
Objective Evidence:	Ladang Rompin and Ladang Padang No evidence that the supply of water for workers housing are according to Clause No. 6.(1)(a) and 6.(3) of Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) requirements.	
Corrections:	<u>Ladang Rompin</u> Operating Unit will approach JTK/KKM/SPAN and the municipality to determine the appropriate license or permit to apply for the supply of portable water.  <u>Ladang Padang</u>	

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	Follow up with JTK/SPAN/municipality for written approval for the provision of portable water.
Root cause analysis:	<p><u>Ladang Rompin</u>            Operating Unit have been unable to locate any specific regulations or licensing requirements with respect to the provision of portable water save for the legal requirements as per Employees’ Minimum Standards of Housing, Accommodations and Amenities Act 1990 (Act 446). Nevertheless, Operating Unit have been providing portable water as required under the Act and have been sending our treated water to third party laboratories for testing annually. In 2016, the Estate applied to JTK to obtain a permit to supply portable drinking water and this was subsequently referred by JTK to KKM for follow up. No further follow up occurred until our drinking water was tested by KKM in year 2018 for our new quarters. No specific permit was issued by JTK.</p> <p><u>Ladang Padang</u>            Operating Unit have been unable to locate any specific regulations or licensing requirements with respect to the provision of portable water save for the legal requirements mentioned in the Employees’ Minimum Standards of Housing, Accommodations and Amenities Act 1990 (Act 446). Nevertheless, Operating Unit have been providing portable water as required under the Act and have been sending our treated water to third party laboratories for testing annually.</p> <p>Operating Unit had also attempted to obtain written approval from JTK. As of 11 April 2021, Operating Unit had been informed by JTK that jurisdiction had passed on to SPAN/municipality.</p>
Corrective Actions:	<p><u>Ladang Rompin</u>            To follow up with relevant authority until the permit is obtained.            The legal officer will report to the MSP0 Committee semi-annually on any follow up action.</p> <p><u>Ladang Padang</u>            To follow up with relevant authority until the permit is obtained.            The legal officer will report to the MSP0 Committee semi-annually on any follow up action.</p>
Verification	Corrective action plan accepted. The effectiveness of corrective action will be verified during next surveillance audit

Noteworthy Positive Comments	
1	Good relationship being maintained with surrounding communities.
2	Good document retrieval.

**3.3 Status of Nonconformities Previously Identified and OFI**

Major Nonconformities:		
Ref: 1924485-202001-M1	Area/Process: Ladang Padang	Clause: 4.3.1.1
	Issue Date: 19/06/2020	Date of closure: 02/07/2020



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Requirements:	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.
Statement of Nonconformity:	Some of legal requirement is not complied.
Objective Evidence:	Marniati (Passport No: AU530291) was employed on 17/10/2019 however there is no SOCSO contribution made for her from October 2019 until June 2020 by employer. This is further verified with SOCSO Officer Putrajaya (Mr. Farihan) as per requirement in Pekeliling Majikan Bil. 3, Tahun 2018, Akta Keselamatan Sosial Pekerja 1969, Peralihan Pampasan Kemalangan Pekerja Asing Daripada Skim Pampasan Pekerja Asing (SPPA), Jabatan Tenaga Kerja Kepada Skim Bencana Kerja PERKESO (SBKP): clause 2.2 Mulai 1 Januari 2019, pampasan kemalangan pekerja asing adalah diambil alih oleh PERKESO melalui peruntukan Akta Keselamatan Sosial Pekerja 1969 (Akta 4) yang hanya meliputi Skim Bencana Kerja sahaja.
Corrections:	Contribution in SOCSO arrears has immediately been made for Marniati (Passport No: AU530291).
Root cause analysis:	Inadvertent oversight by the person in charge, for this worker only. Also, Assistant manager & Recruitment Clerk did not double check.
Corrective Actions:	To avoid any inadvertent omission, a checklist on the performance parameters for the administration of new workers has been drawn up and will be implemented immediately.
Verification	ASA 2 verification. The Company has established and updated list of applicable laws and regulations that are applicable for the estate and mill operation. The legal register is prepared by Sin Thye Management Sdn Bhd (HQ) and reviewed on 18/05/2021. Contribution in SOCSO has implemented accordingly as per evidence sample pays lips checked during ASA 2. Thus, this Major NC remain closed.

Major Nonconformities:		
<b>Ref:</b> <b>1924485-202001-M2</b>	<b>Area/Process: Ladang Padang</b>	<b>Clause: 4.5.1.2</b>
	<b>Issue Date: 19/06/2020</b>	<b>Date of closure: 02/07/2020</b>
Requirements:	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations.	
Statement of Nonconformity:	Diesel fueling activities was not mentioned in Environmental Management Plan.	
Objective Evidence:	Diesel spillage was sighted at the diesel tank due to vehicle fueling activities. However, this activity was not mentioned in their Environmental Management Plan. According to the MSPO Procedure: Environmental Management Plan (EMP), under section 6.1 Identification of Environmental Aspect, "Estate must identify the potential environmental impacts that arise from their activities and facilities, taking into consideration the activities, operations and facilities associated with estate daily operations and conditions".	
Corrections:	Operating Unit have added this potential pollution into the aspect-impact assessment form and conducted the environmental impact analysis. Immediately, a metal pan will	

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	be made available at the refueling point which will be placed beneath the fuel tanks of all agricultural machinery during refueling. The pan will also be made available during topping up of the skid tanks.
Root cause analysis:	Incomplete analysis of potential environmental impacts. Operating Unit have checked that the nozzle of the diesel pump is not leaking. Therefore, this is due to accidental spillage of diesel fuel at the refueling point for example due to careless handling.
Corrective Actions:	Drivers will be briefed to take extra care during refueling. A pan will be placed at the refueling point and drivers will be briefed on the usage of the pan. More effort will be made during the environmental committee meetings to brainstorm on potential aspects and impacts.
Verification	ASA 2 verification Environmental Aspect Impact Assessment was developed. Waste management plan has been prepared for Ladang Rompin, Ladang Viva and Ladang Padang dated 08/03/2021. They have identified the sources of waste and action taken to control and monitor the program. Diesel Fuel activities has been listed in the Environmental Management Plan 2021. Thus, this Major NC remain closed.

<b>Opportunity For Improvement</b>		
<b>Ref:</b> <b>1924485-202001-I1</b>	<b>Area/Process: Ladang Padang &amp; Ladang Rompin</b>	<b>Clause: 4.1.2.2</b>
Objective Evidence:	The Internal Audit Procedure has no clear timeframe for non-conformity raised to be closed. The timeframe to close an NC is different for each non-conformity raised based on HQ's advice.	
Verification	ASA 2 verification Based on the MSPO Internal Audit Procedure; MSPO-P1-C2; Rev. 1.02; Dated 1/3/2021, the internal audit has stated clear timeframe for non-conformity raised to be closed.	

<b>Opportunity For Improvement</b>		
<b>Ref:</b> <b>1924485-202001-I2</b>	<b>Area/Process: Ladang Padang &amp; Ladang Rompin</b>	<b>Clause: 4.4.5.3</b>
Objective Evidence:	The duration of employment contract for Nepalese workers is 3 years but was renewed annually and Indonesia workers is 2 years but was renewed annually.	
Verification	ASA 2 verification All estates management ensured that employees' pay and conditions met legal requirements as per Employment Act and Minimum Wages order. This confirmed through verification of sample work agreement, passport, work permit, detail payslip, check roll & attendance for Oct 2020, Dec 2020, Feb 2021 & April 2021. The employment contract for Nepalese and Indonesian workers has been standardized.	

<b>Opportunity For Improvement</b>		
<b>Ref:</b> <b>1924485-202001-I3</b>	<b>Area/Process: Ladang Padang &amp; Ladang Rompin POM</b>	<b>Clause: 4.4.5.3</b>

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Objective Evidence:	The duration of employment contract for Nepalese workers is 3 years but was renewed annually and Indonesia workers is 2 years but was renewed annually.
Verification	ASA 2 verification All estates management ensured that employees' pay and conditions met legal requirements as per Employment Act and Minimum Wages order. This confirmed through verification of sample work agreement, passport, work permit, detail payslip, check roll & attendance for Oct 2020, Dec 2020, Feb 2021 & April 2021. The employment contract for Nepalese and Indonesian workers has been standardized.

Opportunity For Improvement		
<b>Ref:</b> <b>1924485-202001-I4</b>	<b>Area/Process: Ladang Padang &amp; Ladang Rompin POM</b>	<b>Clause: 4.1.2.2</b>
Objective Evidence:	The Internal Audit Procedure has no clear timeframe for non-conformity raised to be closed. The timeframe to close an NC is different for each non-conformity raised based on HQ's advice.	
Verification	ASA 2 verification Based on the MSPO Internal Audit Procedure; MSPO-P1-C2; Rev. 1.02; Dated 1/3/2021, the internal audit has stated clear timeframe for non-conformity raised to be closed.	

**3.4 Summary of the Nonconformities and Status**

CAR Ref.	CLASS	ISSUED	STATUS
1774601-201905-M1	Major	31/5/2019	Closed on 10/06/2019
1774601-201905-M2	Major	31/5/2019	Closed on 10/06/2019
1774601-201905-M3	Major	31/5/2019	Closed on 10/06/2019
1774601-201905-N1	Minor	31/5/2019	Closed on 19/06/2020
1774601-201905-N2	Minor	31/5/2019	Closed on 19/06/2020
1774601-201905-N3	Minor	31/5/2019	Closed on 19/06/2020
1774601-201905-N4	Minor	31/5/2019	Closed on 19/06/2020
1774601-201905-N5	Minor	31/5/2019	Closed on 19/06/2020
1774601-201905-N6	Minor	31/5/2019	Closed on 19/06/2020
1774601-201905-N7	Minor	31/5/2019	Closed on 19/06/2020
1774601-201905-N8	Minor	31/5/2019	Closed on 19/06/2020
1774601-201905-N9	Minor	31/5/2019	Closed on 19/06/2020
1924485-202001-M1	Major	19/6/2020	Closed on 02/07/2020
1924485-202001-M2	Major	19/6/2020	Closed on 02/07/2020
2066966-202106-N1	Minor	11/06/2021	Open



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2066966-202106-N2	Minor	11/06/2021	Open
2066966-202106-N3	Minor	11/06/2021	Open
2066966-202106-N4	Minor	11/06/2021	Open

**3.5 Issues Raised by Stakeholders**

IS #	Description
<b>1</b>	<b>Issues:</b> Mill Staff – Management has implemented MSPO in the Mill and Estate. The wages were according to Law and Regulation. Staff will collect any information from the general workers and raised it during management meeting.
	<b>Management Responses:</b> Noted on the information.
	<b>Audit Team Findings:</b> No further issue.
<b>2</b>	<b>Issues:</b> Foreign worker– There is no force labor in the Mill and estate. Workers welfare was taking care by the management. They were provided with facilities at the line site.
	<b>Management Responses:</b> Noted on the information.
	<b>Audit Team Findings:</b> No further issue.
<b>3</b>	<b>Issues:</b> Laboratory staff – Management has implemented MSPO in the Mill and Estate. Management has provided safety training for staff and general workers. There is no issue on sexual harassment.
	<b>Management Responses:</b> Noted on the information.
	<b>Audit Team Findings:</b> No further issue.
<b>4</b>	<b>Issues:</b> IPD Kluang – Interview was conducted with weapon section IPD Kluang found management has good relationship with police. There is evidence on two-way communication has been made related weapon renewal.
	<b>Management Responses:</b> Noted on the information.
	<b>Audit Team Findings:</b> No further issue.

**Section 4: Assessment Conclusion and Recommendation**

<b>Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings</b>	
Based on the findings during the assessment <i>Seong Thye Plantations Sdn Bhd (Ladang Rompin POM and Ladang Padang POM)</i> Certification Unit complies with the <i>MS 2530-3:2013 and MS 2530-4:2013</i> . It is recommended that the certification of <i>Seong Thye Plantations Sdn Bhd (Ladang Rompin POM and Ladang Padang POM)</i> Certification Unit is approved and continued.	
<b>Acknowledgement of Assessment Findings</b>	<b>Report Prepared by</b>
<b>Name:</b> NG YEEN CHERN	<b>Name:</b> NOR HALIS ABU ZAR
<b>Company name:</b> SEONG THYE PLANTATIONS SDN BHD	<b>Company name:</b> BSI MALAYSIA
<b>Title:</b> CHIEF OPERATING OFFICER	<b>Title:</b> CLIENT MANAGER
<b>Signature:</b> 	<b>Signature:</b> 
<b>Date:</b> 07.07.2021	<b>Date:</b> 28.06.2021

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

**MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General Principles for Palm Oil Mills**

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	Policy for the implementation of MSPO shall be established. <b>- Major compliance -</b>	The policy for the implementation of MSPO established as Sustainability Policy; Dated 2/1/2019; Signed by the Executive Chairman of Seong Thye Plantations Sdn. Bhd.	Complied
<b>4.1.1.2</b>	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. <b>- Major compliance -</b>	The Sustainability Policy has emphasized on the continuous review and improve of operations related to social, environmental and economic sustainability guided by the principles of MSPO and best practices of industry. Latest briefing conducted by management to Rompin POM workers was on 30/4/2021 while for Padang POM workers was on 26/5/2021.	Complied
<b>Criterion 4.1.2 – Internal Audit</b>			
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. <b>- Major compliance -</b>	An Annual Internal Audit Plan based on Appendix 1 of MSPO Internal Audit Procedure was established for the year 2021. The plan also included with Audit Schedule as per Appendix 2 of the procedure which defined the audit scope and criteria for audit to be conducted in respective operating units.	Complied
<b>4.1.2.2</b>	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to	Based on the MSPO Internal Audit Procedure; MSPO-P1-C2; Rev. 1.02; Dated 1/3/2021, the internal audit was conducted as per plan	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	implement the necessary corrective action. <b>- Major compliance -</b>	reported in the MSPO Audit Forms for the latest audit conducted as following: <ul style="list-style-type: none"> <li>- Rompin Palm Oil Mill; Date: 8/4/2021</li> <li>- Padang Palm Oil Mill; Date: 29-30/4/2021</li> </ul> Both internal audits were conducted by internal auditors Baldap Singh and Jogindro Nath.	
<b>4.1.2.3</b>	Reports shall be made available to the management for their review. <b>- Major compliance -</b>	Report available as per MSPO Audit Forms above. No findings in Rompin POM while there was 1 Major NC in Padang POM. The Non-Conformance Form; Appendix 4; records Major NC raised in Padang was resolved and verified closed by internal auditors on 27/5/2021.	Complied
<b>Criterion 4.1.3 – Management Review</b>			
<b>4.1.3.1</b>	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. <b>- Major compliance -</b>	Management review meeting for both Rompin POM and Padang POM was conducted on 24/5/2020. The minutes of meeting records shown internal audit results been reviewed and management instructed to resolve the Major NC findings in Padang POM accordingly.	Complied
<b>Criterion 4.1.4 – Continual Improvement</b>			
<b>4.1.4.1</b>	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. <b>- Major compliance -</b>	The continuous improvement plan documented in Appendix 2 of Management Review Procedure. Latest reviewed plan dated 1/1/2021 for Rompin POM was established as following: <ul style="list-style-type: none"> <li>- Goal 1: To have an adequate and conducive place for calcium carbonate storage; Completion date: April 2021</li> </ul>	Complied

Criterion / Indicator		Assessment Findings	Compliance						
		<ul style="list-style-type: none"> <li>- Goal 2: To have a better and effective emergency shower and eyewash</li> </ul> <p>For Padang POM, the continuous improvement plan was based on impacts of social and environmental impacts assessments which were developed based on criteria as following:</p> <ul style="list-style-type: none"> <li>- Housing/facilities</li> <li>- Economic livelihood</li> <li>- Religious facilities</li> <li>- Health services</li> <li>- Transportation</li> </ul>							
<b>4.1.4.2</b>	<p>The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.</p> <p><b>- Major compliance -</b></p>	<p>Rompin POM has implemented a new technology of its boiler stacks emission control by installing an Electrostatic Precipitator System (ESP) as the air pollution control system to comply with environmental legal requirements. The system was installed by Boilermech Sdn. Bhd.</p> <p>For Padang POM, based on the documented Latest Technology and Systems, Standards and Practices; Ref. # MSPO-P1-2, the New Technology, Systems, Standards and Practices Identified for potential applicability in the year 2021 were as following:</p> <table border="1"> <thead> <tr> <th>New technology</th> <th>Potential benefit</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>Air Pollution Control System (APCS)</td> <td>Reduce Particulate Matter (PM) from 400 mg/m3 to 150 mg/m3</td> <td>To be commission July 2021</td> </tr> </tbody> </table>	New technology	Potential benefit	Status	Air Pollution Control System (APCS)	Reduce Particulate Matter (PM) from 400 mg/m3 to 150 mg/m3	To be commission July 2021	Complied
New technology	Potential benefit	Status							
Air Pollution Control System (APCS)	Reduce Particulate Matter (PM) from 400 mg/m3 to 150 mg/m3	To be commission July 2021							



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Criterion / Indicator		Assessment Findings			Compliance
		Online Measurement of Opacity and TPM	Monitoring consistently the boiler emissions	To be commission July 2021	
<b>4.2 Principle 2: Transparency</b>					
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements					
<b>4.2.1.1</b>	<p>The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.</p> <p><b>- Major compliance -</b></p>	<p>Both Rompin POM and Padang POM documented information related to stakeholder requests in the Information Request Form-MSPO Related; Appendix 4 of Stakeholder Consultation &amp; Communication Procedure. No requests received from external stakeholder since the last audit except for sample sighted for requests made from authorities from inspection visit in Padang POM as following:</p> <ul style="list-style-type: none"> <li>- DOSH visit date: 8/2/2021: Request to pay inspection fee in 14 days</li> <li>- DOE visit date: 7/12/2020: Request to response before 24/12/2020</li> </ul> <p>Both requests were responded accordingly.</p>			Complied
<b>4.2.1.2</b>	<p>The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p><b>- Major compliance -</b></p>	<p>Both Rompin POM and Padang POM adopted Seong Thye Plantations' enlisted List of Public Documents Available for MSPO Stakeholder Inspection; MSPO-P2-C1; Version control: 1.00; Date: 1/1/2019 as part of transparency commitment with categories of documents as following:</p> <ul style="list-style-type: none"> <li>- All MSPO Policies and Licences</li> <li>- Safety and health plan</li> <li>- Plans and impact assessment relating to social impact</li> </ul>			Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>- Plans and impact assessment relating to environmental impact</li> <li>- Pollution prevention plan</li> <li>- Records of complaints and grievances</li> <li>- Continual improvement plan</li> <li>- Others</li> </ul>	
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<b>4.2.2.1</b>	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p><b>- Major compliance -</b></p>	<p>Both Rompin POM and Padang POM established the Stakeholder Communication &amp; Consultation Procedure; MSPO-P2-C2; Rev. 1.02; Dated 8/5/2019 for consultation and communication with relevant stakeholders.</p>	Complied
<b>4.2.2.2</b>	<p>The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i>.</p> <p><b>- Minor compliance -</b></p>	<p>Based on the established organization structure of MSPO Standard Committee 2021, the management of Rompin POM nominated the following:</p> <ul style="list-style-type: none"> <li>- Mr. Sik Yong Thai (Assistant Manager) as internal &amp; External Communication (Transparency) Officer</li> <li>- Mr. Selamat Bin Basar (Field Conductor) as Complaints &amp; Grievances Officer</li> </ul> <p>For Padang POM, Mr. Choong Jing Hui (Assistant Manager) was nominated as the MSPO Committee Transparency, Traceability and Complaints &amp; Grievances Officer as per appointment letter by Estate Manager dated 1/1/2019.</p>	Complied
<b>4.2.2.3</b>	<p>A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained.</p> <p><b>- Major compliance -</b></p>	<p>A list of stakeholders documented in the Appendix 1 of Stakeholder Consultation &amp; Communication Procedure as Stakeholders List latest updated on 8/3/2021 for Rompin POM and Stakeholder List 2021 for Padang POM.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance								
		<p>Based on minutes of meeting record, latest external stakeholder meeting for Rompin POM was conducted on 18/3/2021 with attendance from neighbouring estate representative, Balai Polis Rompin representative as well as suppliers and contractors' representatives.</p> <p>For Padang POM, a letter dated 8/4/2021 was sent to external stakeholders for cancellation of stakeholder meeting notice due to COVID-19 pandemic and MCO. To obtain feedbacks, as set of documents were attached with the notice including feedback form, MSPO policy and acknowledgement received etc. Sighted sample acknowledgement by stakeholders i.e. Kluang Wildlife Department and Perniagaan Seri Dinding shown no negative feedbacks from them. Meeting between Padang POM management with internal stakeholder among all Padang POM employees was conducted latest on 17/3/2021. Few feedbacks from employees were received by the management during the meeting with note that action will be taken in upcoming weeks.</p>									
<b>Criterion 4.2.3 – Traceability</b>											
<b>4.2.3.1</b>	<p>The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability.</p> <p><b>- Major compliance -</b></p>	<p>The Traceability procedure namely Survey of Workflow for Traceability, version 1, revision 1.01 dated 30.08.2018 is available from planting to CPO/PK dispatch.</p> <p>The following information is available in the weighbridge ticket and/or DO for FFB supplied, example is:</p> <p>Ladang Rompin POM - FFB</p> <table border="1"> <thead> <tr> <th>Date</th> <th>30/11/2020</th> <th>31/03/2021</th> <th>31/01/2021</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Date	30/11/2020	31/03/2021	31/01/2021					Complied
Date	30/11/2020	31/03/2021	31/01/2021								

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Criterion / Indicator		Assessment Findings				Compliance
		Ticket No.	357110	361798	359530	
		Lorry No.	WFH4431	MD3884	CCV3399	
		Weight	5.59 MT	5.34 MT	8.83 MT	
		Ladang Rompin POM - CPO				
		Date	14/03/2021	22/01/2021	08/11/2020	
		Ticket No.	151045	151227	150823	
		Lorry No.	NCD9858	NCD9728	NCE8728	
		Weight	31.48 MT	32.35 MT	29.45 MT	
		Ladang Padang POM - CPO				
		Date	21/01/2021	25/03/2021	27/11/2020	
		Ticket No.	12744	12861	12670	
		Lorry No.	NAM4409	BGF4726	JJX610	
		Weight	26.55	37.73 MT	34.29 MT	
		The ticket detail up on: - Date of weighing - Gross/tare/net weight - Contract no. (e.g. Long Term 05/19) - Weighbridge ticket no. - Description of content (CPO or PK) - Vehicle no. - Name of driver (in DO) - Time in & out - Seal No. - MPOB form (ref. To seal No. and DO no.)				
<b>4.2.3.2</b>	The management shall conduct regular inspections on compliance	For Ladang Rompin POM & Ladang Padang POM, the management has made the check on the traceability from planting to CPO/PK				

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	with the established traceability system. <b>- Major compliance -</b>	dispatch. Refer Visiting Report Ladang Rompin Palm Oil Mill by Chief Engineer to Chief Operating Officer dated 02/04/2021.																																	
<b>4.2.3.3</b>	The management shall identify and assign suitable employees to implement and maintain traceability system. <b>- Minor compliance -</b>	The traceability MSPO Committee Officer: Ms Kanageswary on 01.01.2021 (Ladang Rompin Palm Oil Mill). Mr Choong Jing Hui on 01.01.2019 (Ladang Padang Palm Oil Mill). Among the roles and responsibility are: 1. Keep abreast of changes to relevant MSPO requirement 2. Review relevant MSPO requirement. 3. Review compliance in fact and in documentation	Complied																																
<b>4.2.3.4</b>	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. <b>- Major compliance -</b>	The Traceability procedure namely Survey of Workflow for Traceability, version 1, revision 1.01 dated 30.08.2018 is available from planting to CPO/PK dispatch.  The following information is available in the weighbridge ticket and/or DO for FFB supplied, example is:  Ladang Rompin POM - FFB <table border="1"> <tr> <td>Date</td> <td>30/11/2020</td> <td>31/03/2021</td> <td>31/01/2021</td> </tr> <tr> <td>Ticket No.</td> <td>357110</td> <td>361798</td> <td>359530</td> </tr> <tr> <td>Lorry No.</td> <td>WFH4431</td> <td>MD3884</td> <td>CCV3399</td> </tr> <tr> <td>Weight</td> <td>5.59 MT</td> <td>5.34 MT</td> <td>8.83 MT</td> </tr> </table>  Ladang Rompin POM - CPO <table border="1"> <tr> <td>Date</td> <td>14/03/2021</td> <td>22/01/2021</td> <td>08/11/2020</td> </tr> <tr> <td>Ticket No.</td> <td>151045</td> <td>151227</td> <td>150823</td> </tr> <tr> <td>Lorry No.</td> <td>NCD9858</td> <td>NCD9728</td> <td>NCE8728</td> </tr> <tr> <td>Weight</td> <td>31.48 MT</td> <td>32.35 MT</td> <td>29.45 MT</td> </tr> </table>	Date	30/11/2020	31/03/2021	31/01/2021	Ticket No.	357110	361798	359530	Lorry No.	WFH4431	MD3884	CCV3399	Weight	5.59 MT	5.34 MT	8.83 MT	Date	14/03/2021	22/01/2021	08/11/2020	Ticket No.	151045	151227	150823	Lorry No.	NCD9858	NCD9728	NCE8728	Weight	31.48 MT	32.35 MT	29.45 MT	Complied
Date	30/11/2020	31/03/2021	31/01/2021																																
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		<p>Ladang Padang POM - CPO</p> <table border="1"> <tr> <td>Date</td> <td>21/01/2021</td> <td>25/03/2021</td> <td>27/11/2020</td> </tr> <tr> <td>Ticket No.</td> <td>12744</td> <td>12861</td> <td>12670</td> </tr> <tr> <td>Lorry No.</td> <td>NAM4409</td> <td>BGF4726</td> <td>JJX610</td> </tr> <tr> <td>Weight</td> <td>26.55</td> <td>37.73 MT</td> <td>34.29 MT</td> </tr> </table> <p>The ticket detail up on:</p> <ul style="list-style-type: none"> <li>- Date of weighing</li> <li>- Gross/tare/net weight</li> <li>- Contract no. (e.g. Long Term 05/19)</li> <li>- Weighbridge ticket no.</li> <li>- Description of content (CPO or PK)</li> <li>- Vehicle no.</li> <li>- Name of driver (in DO)</li> <li>- Time in &amp; out</li> <li>- Seal No.</li> <li>- MPOB form (ref. To seal No. and DO no.)</li> </ul>	Date	21/01/2021	25/03/2021	27/11/2020	Ticket No.	12744	12861	12670	Lorry No.	NAM4409	BGF4726	JJX610	Weight	26.55	37.73 MT	34.29 MT	
Date	21/01/2021	25/03/2021	27/11/2020																
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Weight	26.55	37.73 MT	34.29 MT																
<b>4.3 Principle 3: Compliance to legal requirements</b>																			
<b>Criterion 4.3.1 – Regulatory requirements</b>																			
<b>4.3.1.1</b>	<p>All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.</p> <p><b>- Major compliance -</b></p>	<p>Sighted List of Important License 2021 Seong Thye Plantations Sdn Bhd. Refer document number MSPO-P3-C1</p> <p>Ladang Rompin Palm Oil Mill</p> <p>1. MPOB license: 500216104000 (validity period until 31/05/2022)</p>	Complied																

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		<p>2. DOE License: JP/KKS/2018/2019/004158 – No. 004158 (validity period until 30/06/2022) for 40MT/hr and method of POME discharge is water course.</p> <p>3. Diesel Permit, serial number: P (C000004-RPN), ref# PHG/RPN/043/95 SK D for 15,000 litre and valid until 13/12/2021</p> <p>4. Permit to Purchase Store and Use of Sodium Hydroxide –valid until 31/12/2021.</p> <p>Ladang Padang Palm Oil Mill</p> <p>1. MPOB license: 500014104000 (validity period until 31.03.2022 for 96,000 Tons. The mill is in the process of upgrading their milling capacity to 60 mt per hour.</p> <p>2. DOE License: Permit Barang Kawalan Berjadual expired on 17/07/2021.</p> <p>3. Lesen Melencong/Mengabstrak Air Sungai BAKAJ expired on 31/12/2021.</p> <p>4. Jadual Pematuhan Jabatan Alam Sekitar Negeri Johor expired on 30/06/2021.</p>	
<b>4.3.1.2</b>	<p>The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p><b>- Major compliance -</b></p>	<p>Ladang Rompin Palm Oil Mill and Padang Palm Oil Mill</p> <p>The Company has established and updated list of applicable laws and regulations that are applicable for the estate and mill operation. The legal register is prepared by Sin Thye Management Sdn Bhd (HQ) and reviewed on 18/05/2021.</p> <p>It includes the following:</p> <p>1. Occupational Safety and Health Act 1994</p>	Complied

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		2. Pesticides Act 1974 (Act 149) 3. Fire Service Act, 1984 4. Environmental Quality Act 1974 5. Workers' Minimum Standards of Housing and Amenities Act 1990 (Amended 2021) 6. Employment Act 1955 7. Employee Provident Fund Act 1991 8. Employees Social Security Act 1969 9. National Wage Consultative Council Act 2011, Minimum Wages Order 2020 10. Prevention and Control of Infectious Disease Act 1988 (Amendment 2020)	
<b>4.3.1.3</b>	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p><b>- Major compliance -</b></p>	<p>The legal requirements register on both Ladang Rompin Palm Oil Mill &amp; Ladang Padang Palm Oil Mill had been updated as and when there are any new amendments or any new regulations coming into force based on the Document: – Updates on Legal Matters Doc: MSPO-P3-C1. This will be done by personnel from HQ level. The Master list was updated on 08/05/2021.</p>	Complied
<b>4.3.1.4</b>	<p>The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.</p> <p><b>- Minor compliance -</b></p>	<p>Ladang Rompin Palm Oil Mill</p> <p>The management has assigned Mr. Lim Kim Tong as the Legal MSPO Officer responsible for legal compliance and track update in the changes in regulatory requirements. The appointment was made on 01/01/2021. Sighted the appointment letter and received note by Mr. Lim Kim Tong.</p> <p>Ladang Padang Palm Oil Mill</p>	Complied



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		The management has assigned Mr. Pang Hau Chin as the Legal MSPO Officer responsible for legal compliance and track update in the changes in regulatory requirements. The appointment was made on 01/01/2019. Sighted the appointment letter and received note by Mr. Pang Hau Chin.	
<b>Criterion 4.3.2 – Lands use rights</b>			
<b>4.3.2.1</b>	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.  - <b>Major compliance</b> -	Rompin POM located within Rompin Estate that hold following: <ul style="list-style-type: none"> <li>- Land title # 5330; District: Rompin; Sub-district: Mukim Rompin; Lot # 5082; Area: 2,428 ha; Register date: 24/2/2004</li> <li>- Land title # 1321; District: Rompin; Sub-district: Mukim Rompin; Lot # 2663; Area: 2.025 ha; Register date: 17/3/2008</li> <li>- Land title # 5468; District: Rompin; Sub-district: Mukim Rompin; Lot # 3244; Area: 610.6 ha; Register date: 4/6/2004</li> </ul> Padang POM located within Padang Estate that hold following: <ul style="list-style-type: none"> <li>- Land title # 37218; District: Kluang; Sub-district: Mukim Kahang; Lot # 3222; Area: 2,226 ha; Register date: 30/11/2008</li> </ul>	Complied
<b>4.3.2.2</b>	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land.  - <b>Major compliance</b> -	Documents showing legal ownership, history of land tenure and the actual legal use of the land provided by management as sighted in indicator 4.3.2.1 above.	Complied
<b>4.3.2.3</b>	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.	Sighted boundary Map evidence. Verified through evidence of photo found there is maintenance done at boundary stone.	Complied

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	- Major compliance -		
4.3.2.4	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC).  - Minor compliance -	Based on documentations and consultation, no disputes issues occur since the last audit. In case of any, the process will be handle based on the established Free Prior Informed Consent (FPIC) Procedure; MSPO-P3-C2; Revisions:1.01; Date: 22 May 2019.	Complied
<b>Criterion 4.3.3 – Customary rights</b>			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.  - Major compliance -	The land for both Rompin POM and Padang POM was not encumbered by customary rights. In case of any, the process will be demonstrated based on the established Free Prior Informed Consent (FPIC) Procedure; MSPO-P3-C2; Revisions:1.01; Date: 22 May 2019.	Complied
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available.  - Minor compliance -	Rompin POM located within Rompin Estate while Padang POM located within Padang Estate. Maps of both estates available with appropriate scale showing boundaries of each estates' land.	Complied
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available.  - Major compliance -	Based on documentations and consultation, no disputes issues occur since the last audit. In case of any, the process will be handle based on the established Free Prior Informed Consent (FPIC) Procedure; MSPO-P3-C2; Revisions:1.01; Date: 22 May 2019.	Complied
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			

Criterion / Indicator		Assessment Findings	Compliance									
<p><b>4.4.1.1</b></p>	<p>Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones.</p> <p><b>- Minor compliance -</b></p>	<p>Both Rompin POM and Padang POM established the Social Impact Assessment Questionnaire (SIA) to conduct the assessment through consultation with stakeholders. Sighted sample records as following:</p> <ul style="list-style-type: none"> <li>- External Stakeholder – Environmental Aspect Impact Assessment (EIA) Plan; 1/12/2020 Rompin POM.</li> <li>- External Stakeholder – Social Aspect Impact Assessment (SIA) Questionnaire; 18/3/2021 Rompin POM.</li> </ul> <p>Latest assessment for Padang POM was conducted on 17/3/2021 with internal stakeholders among all employees whilst external stakeholders’ consultation was conducted through letters since to unable to meet due to COVID-19 pandemic.</p> <p>Based on the consultation, aspects and impacts identified from stakeholders’ feedbacks were planned to be taken action with Social Impact Assessment Plan (SIA) Ladang Padang POM &amp; Estate established. Among identified issues taken action are as per sample as following:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 35%;">Issues</th> <th style="width: 40%;">Mitigation measure</th> <th style="width: 25%;">Deadline</th> </tr> </thead> <tbody> <tr> <td>Housing condition not conducive. Some of the furniture worn out and the electrical appliances is broken down.</td> <td>Management will schedule the maintenance work to be carry out in 3 months’ time.</td> <td>July 2021</td> </tr> <tr> <td>The canteen does not serve the need and demand of the estate community.</td> <td>Management will discuss the need of worker with the canteen operator and give them 3 months’</td> <td>July 2021</td> </tr> </tbody> </table>	Issues	Mitigation measure	Deadline	Housing condition not conducive. Some of the furniture worn out and the electrical appliances is broken down.	Management will schedule the maintenance work to be carry out in 3 months’ time.	July 2021	The canteen does not serve the need and demand of the estate community.	Management will discuss the need of worker with the canteen operator and give them 3 months’	July 2021	<p>Complied</p>
Issues	Mitigation measure	Deadline										
Housing condition not conducive. Some of the furniture worn out and the electrical appliances is broken down.	Management will schedule the maintenance work to be carry out in 3 months’ time.	July 2021										
The canteen does not serve the need and demand of the estate community.	Management will discuss the need of worker with the canteen operator and give them 3 months’	July 2021										

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		(transparency on the price tag).	time to indicate the price list	
<b>Criterion 4.4.2: Complaints and grievances</b>				
<b>4.4.2.1</b>	A system for dealing with complaints and grievances shall be established and documented. <b>- Major compliance -</b>	A system for dealing with complaints and grievances in Rompin POM and Padang POM established and documented as Grievance & Complaints Handling Procedure; MPSO-P4-C2; Rev. 1.01; Dated 8/5/2019.		Complied
<b>4.4.2.2</b>	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. <b>- Major compliance -</b>	The system able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties.  Sample latest complaints received from internal stakeholder among worker relate to housing repair for house # B1 dated on 9/4/2021 and house # B10 dated on 19/4/2021. Both complaints resolved by Padang POM management on 21/4/2021 and 28/4/2021 respectively.		Complied
<b>4.4.2.3</b>	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. <b>- Minor compliance -</b>	Complaints made available in documented records of Grievances/Complaints Form as the Appendix 3 of Stakeholder Consultation & Communication Procedure. Sighted sample records of complaints as following:  - Septic tank cover broke; Date: 8/4/2021; Resolved date: 9/4/2021 - Water pipe leaks; Date: 21/4/2021; Resolved date: 21/4/2021 - Electrical appliances for repair house # 61; Date: 28/4/2021; Resolved date: 2/5/2021		Complied

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4.4.2.4	<p>Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time.</p> <p><b>- Minor compliance -</b></p>	<p>Training of Grievances &amp; Complaints Handling Procedure was latest conducted by the management for employees of Rompin POM on 11/1/2021 while for Padang POM on 17/3/2021.</p> <p>Communications to external stakeholder of Rompin POM was last conducted during meeting on 18/3/2021 with attendance from neighbouring estate representative, Balai Polis Rompin representative as well as suppliers and contractors' representatives.</p> <p>For Padang POM, a letter dated 8/4/2021 was sent to external stakeholders for cancellation of stakeholder meeting notice due to COVID-19 pandemic and MCO. To obtain feedbacks, as set of documents were attached with the notice including feedback form, MSPO policy and acknowledgement received etc. Sighted sample acknowledgement by stakeholders i.e. Kluang Wildlife Department and Perniagaan Seri Dinding shown no negative feedbacks from them.</p>	Complied
4.4.2.5	<p>Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.</p> <p><b>- Major compliance -</b></p>	<p>Complaints and solutions within the past 24 months were documented and available as per sample as following:</p> <ul style="list-style-type: none"> <li>- Rompin POM: Punctured in ceiling for Security Guard house; Date: 21/6/2019; Resolved date: 23/6/2019</li> <li>- Padang POM: Drywood termites infestation on toilet door; Date: 26/3/2019; Resolved date: 1/5/2019</li> </ul>	Complied
<b>Criterion 4.4.3:</b> Commitment to contribute to local sustainable development			
4.4.3.1	<p>Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community</p>	<p>Latest contribution made by Rompin POM was distribution of meat, chicken and eggs in conjunction with Hari Raya 2021; dated 6/5/2021.</p>	Complied

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	development may be regarded as a joint effort by the mill and the plantation. <b>- Minor compliance -</b>	Padang POM has participated in local dirt road maintenance committee with annual contribution for 25km of road maintenance. The mill provides vehicles for this purpose (e.g. tractors and trailers/shovel loader/backhoe loader).	
<b>Criterion 4.4.4: Employees safety and health</b>			
<b>4.4.4.1</b>	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented. <b>- Major compliance -</b>	Ladang Rompin Palm Oil Mill The mill management has established Occupational Safety & Health Policy which was signed by the Executive Chairman Mr. Goh Wei Lei on 13/05/2019. Briefing on the sustainable policy was made on 30/04/2021. Ladang Padang Palm Oil Mill The mill management has established Occupational Safety & Health Policy which was signed by the Executive Chairman Mr. Goh Wei Lei on 13/05/2019. Policy briefing was conducted on 26/05/2021.	Complied
<b>4.4.4.2</b>	The occupational safety and health plan should cover the following: a) A safety and health policy, which is communicated and implemented. b) The risk of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: i. All employees involved are adequately trained on safe working practices;	a. Safety and health policy and other sustainability policies are displayed at the main board and at any strategic places in the estate compound. For Ladang Rompin Palm Oil Mill, briefing on the sustainable policy was made on 30/04/2021. Briefing record was sighted. For Ladang Padang Palm Oil Mill, briefing on the sustainable policy was made on 26/05/2021. Briefing record was sighted. b. Ladang Rompin POM: HIRARC has been reviewed dated 18/01/2021 – covering all stations such as weighbridge, loading	Complied

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<ul style="list-style-type: none"> <li>ii. All precautions attached to products should be properly observed and applied;</li> <li>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</li> <li>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</li> <li>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.</li> <li>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept and the concerns of employees and any remedial actions taken shall be recorded.</li> <li>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</li> <li>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</li> </ul>	<p>ramp, sterilizer, capstan, thresher, press station, kernel plant, boiler and clarification room. Guideline used: "Garis Panduan bagi Pengenalpastian Hazard, Penaksiran Risiko dan Kawalan Risiko (HIRARC), by DOSH, 2008, JKPP DP 127/788/4-4</p> <p>Ladang Padang POM: HIRARC has been reviewed dated 07/01/2021 – covering all stations such as weighbridge, loading ramp, sterilizer, capstan, thresher, press station, kernel plant, boiler and clarification room. Guideline used: "Garis Panduan bagi Pengenalpastian Hazard, Penaksiran Risiko dan Kawalan Risiko (HIRARC), by DOSH, 2008, JKPP DP 127/788/4-4</p> <p>c. Mill management has developed a 2021 training program for all workers. Awareness and training programme which included safe working practices and on observation of precautions had been established on both Rompin &amp; Padang POMs. Training done by the management are:</p> <p>Ladang Rompin POM</p> <ol style="list-style-type: none"> <li>1. Fire Fighting dated 03/01/2021</li> <li>2. CPR First Aid Training dated 07/01/2021</li> <li>3. Work at Height Training dated 01/03/2021</li> <li>4. PPE Training dated 02/03/2021</li> <li>5. Training Safety Signboard dated 19/04/2021</li> </ol> <p>Ladang Padang POM</p> <ol style="list-style-type: none"> <li>1. First Aid Box Inspection &amp; Training dated 09/03/2021</li> <li>2. Working At Height Safety Training dated 10/02/2021</li> <li>3. MSPO Briefing dated 26/05/2021</li> <li>4. Oil Room Training dated 07/01/2021</li> <li>5. Press Station Training dated 04/02/2021</li> </ol>	

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<p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<p>d. Logbook for PPE issuance was made available to the audit team. Among the PPE issued to the workers are safety shoes, safety kit, seal kit hardness, yellow rubber boot, safety leather hand gloves and long glove, safety mask (respirator 3m). Rompin Pom last record sighted on 18/05/2021. For Padang POM last record sighted on 25/05/2021.</p> <p>e. Seong Thye Plantations had established Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labelling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. There were addressed in Sin Thye Management Sdn Bhd's, "Manual Keselamatan &amp; Kesihatan Pekerja", dated 1/1/2019 which was established with reference to HIRARC, CHRA &amp; SDS. The chapters were:</p> <p>Ladang Rompin POM: CHRA was conducted on 16/10/2020. Refer HQ/07/ASS/00/162-2020/10/004.</p> <p>Ladang Padang POM: CHRA was conducted on 06/07/2020. Refer HQ/16/ASS/00/35-2020/29.</p> <p>f. The mill management has appointed the person in charge for safety and health and responsible for mill activity.</p> <p>Ladang Rompin POM: Ms Jivejothi A/P Achandro dated 01/01/2021</p>	



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	<p>Ladang Padang POM: Mr Ihsan Sabri Bin Hariyanto dated 01/01/2019</p> <p>g. OSH meeting 2020/2021 was conducted respectively as below:</p> <table border="1" data-bbox="1126 571 1865 943"> <thead> <tr> <th>OSH Meeting</th> <th>Ladang Rompin POM</th> <th>Ladang Padang POM</th> </tr> </thead> <tbody> <tr> <td colspan="3">2020</td> </tr> <tr> <td>1<sup>st</sup> Meeting</td> <td>05/03/2020</td> <td>01/03/2020</td> </tr> <tr> <td>2<sup>nd</sup> Meeting</td> <td>04/06/2021</td> <td>02/06/2020</td> </tr> <tr> <td>3<sup>rd</sup> Meeting</td> <td>10/09/2021</td> <td>03/09/2020</td> </tr> <tr> <td>4<sup>th</sup> Meeting</td> <td>10/12/2021</td> <td>04/12/2020</td> </tr> <tr> <td colspan="3">2021</td> </tr> <tr> <td>1<sup>st</sup> Meeting</td> <td>10/03/2021</td> <td>09/03/2021</td> </tr> </tbody> </table> <p>h. During the interview session, the workers are able to demonstrate fair understanding regarding on the accident and emergency procedure. The company has established Manual Keselamatan &amp; Kesehatan Pekerjaan Bahagian Ladang which cover 3 different area; flood, fire and emergency. The briefing was made to the workers on 05.05.2020 together with Policy Briefing. ERP training has been on 03/01/2021 for Ladang Rompin POM while Padang POM 03/05/2021.</p> <p>i. First aid training was conducted, delivered by Estate Hospital Assistant. Sighted evidence of training materials, attendance and photos. Training on CPR/First Aid Training for Ladang</p>	OSH Meeting	Ladang Rompin POM	Ladang Padang POM	2020			1 <sup>st</sup> Meeting	05/03/2020	01/03/2020	2 <sup>nd</sup> Meeting	04/06/2021	02/06/2020	3 <sup>rd</sup> Meeting	10/09/2021	03/09/2020	4 <sup>th</sup> Meeting	10/12/2021	04/12/2020	2021			1 <sup>st</sup> Meeting	10/03/2021	09/03/2021	
OSH Meeting	Ladang Rompin POM	Ladang Padang POM																								
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Criterion / Indicator		Assessment Findings	Compliance
		<p>Rompin POM on 07/01/2021 while at Padang POM on 01/06/2021.</p> <p>j. Accidents has been reviewed during Quarterly OSH Meeting. The mill management has submitted their record of accident/death to Department of Safety and Health.</p> <p>Ladang Rompin POM: Submitted on 02/01/2021 Refer JKKP8/65431/2021</p> <p>Ladang Padang POM: Submitted on 29/01/2021 Refer JKKP8/79474/2021</p>	
<b>Criterion 4.4.5: Employment conditions</b>			
<b>4.4.5.1</b>	<p>The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.</p> <p><b>- Major compliance -</b></p>	<p>Seong Thye Plantations Sdn. Bhd. established the Social and Human Rights Policy as a policy on good social practice regarding human rights in respect of industrial harmony dated 2/1/2019 and signed by company's Executive Chairman.</p> <p>Latest briefing conducted by management to Rompin POM workers was on 30/4/2021 while for Padang POM workers was on 26/5/2021.</p>	Complied
<b>4.4.5.2</b>	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p><b>- Major compliance -</b></p>	<p>Both Rompin POM and Padang POM adopted the company's Human Rights and Social Policy dated 2/1/2019 that emphasized commitments towards good social practices in respect to human rights and industrial harmony.</p> <p>No evidence that the management engage in or support discriminatory practices. Interview conducted with sample workers confirmed that the company provide equal opportunity and</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance																																	
		treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.																																		
<b>4.4.5.3</b>	<p>Management shall ensure that employees' pay, and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p><b>- Major compliance -</b></p>	<p>Both Rompin POM and Padang POM management ensured that employees' pay and conditions met legal requirements as per Employment Act and Minimum Wages order. This confirmed through verification of sample work agreement, passport, work permit, detail payslip, checkroll &amp; attendance for Oct 2020, Dec 2020, Feb 2021 &amp; April 2021 as following:</p> <p>Rompin POM:</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Name</th> <th>Job Description</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Atok A/L Kidai</td> <td>Effluent</td> </tr> <tr> <td>2</td> <td>Hafizam Bin Chong Bing @ Sulaiman</td> <td>Fitter</td> </tr> <tr> <td>3</td> <td>Razidi</td> <td>General Worker</td> </tr> <tr> <td>4</td> <td>Durga Bahadur Magar</td> <td>Oil Room</td> </tr> <tr> <td>5</td> <td>Bishwanath Chaudary</td> <td>Kernel</td> </tr> <tr> <td>6</td> <td>Som Bahadur Gurung</td> <td>Security</td> </tr> </tbody> </table> <p>Padang POM:</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Name</th> <th>Position</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Arizan Bin Sugimin (Staff)</td> <td>Boiler</td> </tr> <tr> <td>2</td> <td>Hamidah</td> <td>Mill Worker</td> </tr> <tr> <td>3</td> <td>Santosh Kumar Pandit</td> <td>Mill Worker</td> </tr> </tbody> </table>	No.	Name	Job Description	1	Atok A/L Kidai	Effluent	2	Hafizam Bin Chong Bing @ Sulaiman	Fitter	3	Razidi	General Worker	4	Durga Bahadur Magar	Oil Room	5	Bishwanath Chaudary	Kernel	6	Som Bahadur Gurung	Security	No.	Name	Position	1	Arizan Bin Sugimin (Staff)	Boiler	2	Hamidah	Mill Worker	3	Santosh Kumar Pandit	Mill Worker	Complied
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Criterion / Indicator		Assessment Findings			Compliance
		4	Agus Alwi	Mill Worker	
		5	Balram Mandal Khatwe	Mechanical Fitter	
<b>4.4.5.4</b>	<p>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.</p> <p><b>- Minor compliance -</b></p>	No contractor workers engaged in both Rompin POM and Padang POM.			Complied
<b>4.4.5.5</b>	<p>The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p><b>- Major compliance -</b></p>	Both Rompin POM and Padang POM established and provided accurate overview of all employees records as per sighted List of Foreign Worker 2021/2022 and Mill Local Workers registers.			Complied
<b>4.4.5.6</b>	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.</p> <p><b>- Major compliance -</b></p>	<p>Based on sample records sighted in indicator 4.4.5.3 above, it was found that the allowance entitlement as per Employment Contract clause 3 (e) not paid/reflective in payslip samples for following employees in Rompin POM as following:</p> <ol style="list-style-type: none"> <li>1) Durga Bahadur Magar (Oil Room Operator)</li> <li>2) Bishwanath Chaudary (Kernel Operator)</li> </ol> <p>This indicated that the work agreement (Employment Contract) for sample employees not being fulfilled some of its conditions.</p> <p>Hence, a Minor NC has been raised on the matter.</p>			Minor NC

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Criterion / Indicator		Assessment Findings	Compliance
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. <b>- Major compliance -</b>	Based on sample records sighted in indicator 4.4.5.3 above, it was found that the established time recording system for both employees and employers were transparently recorded the working hours and overtime.	Complied
4.4.5.8	The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable. <b>- Major compliance -</b>	Based on sample records sighted in indicator 4.4.5.3 above, it was found that the working hours and breaks of the individual worker indicated in the time records complied with labour regulations and collective agreements. Overtime also mutually agreed upon and met Malaysia Employment Act requirements.	Complied
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. <b>- Major compliance -</b>	Based on sample records sighted in indicator 4.4.5.3 above, it was found that the wages and overtime payment documented on the pay slips in line with legal regulations and collective agreements	Complied
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings. <b>- Minor compliance -</b>	Based on sample records sighted in indicator 4.4.5.3 above, it was found that the workers provided with other social benefits as per sample sighted as following: <ul style="list-style-type: none"> <li>- Annual Leave Payment for the Year 2020 – Rompin POM; Dated 24/2/2021.</li> <li>- Monthly Social Security Services contribution for sampled Form 8A SOCSO Contribution Form on months of Oct 2020, Dec 2020, Feb 2021 &amp; Apr 2021.</li> </ul>	Complied
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.	Both Rompin POM and Padang POM provided on-site living quarters that were habitable and have basic amenities and facilities as per authorities records as following:	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- <b>Major compliance</b> -	<ul style="list-style-type: none"> <li>- Rompin POM: <i>Borang 2 Perakuan Kelayakan Peraturan-Peraturan Standard-Standard Minimum Perumahan dan Kemudahan Pekerja 1990 (Peraturan 38(1)(a))</i>; Approval # K.8/2017; Location: Ladang Viva-Splendid, Daerah Mersing, Johor; Date 4/7/2018</li> <li>- Padang POM: JTK letter ref. # Bil.(2)dImJTK/KG/7/06318; Date: 7/11/2019 and JTK letter ref. # Bil.(2)dIm.PLN/10103/2020/0026; Date: 20/10/2020</li> </ul>	
<b>4.4.5.12</b>	<p>The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- <b>Major compliance</b> -</p>	<p>Both Rompin POM and Padang POM adopted the company's Human Rights and Social Policy dated 2/1/2019 that emphasized commitments towards providing workplace free from violence and sexual harassment to all employees.</p> <p>Additionally, a documented Guidelines for Addressing Sexual Harassment; MSPO-P4-C5; Version Control # 1.00; Date: 29/8/2018 was established as guidelines for employees in addressing sexual harassment.</p>	Complied
<b>4.4.5.13</b>	<p>The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- <b>Major compliance</b> -</p>	<p>No explicit documentations on the respect of rights of all employees to form and join trade union. However, there are workers representatives in both sites.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance												
<b>4.4.5.14</b>	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.  - <b>Major compliance</b> -	Seong Thye Plantations Sdn Bhd has the Social and Human Rights Policy, signed by Executive Chairman on 02.01.2019 which mention that management will prohibit employment by coercion. Children and young persons shall not be employed or exploited, the minimum age shall comply with local, state and national legislation Based on workers register, no child labour found in both sites.	Complied												
<b>Criterion 4.4.6: Training and competency</b>															
<b>4.4.6.1</b>	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.  - <b>Major compliance</b> -	<p>The management of both Estates had planned, established, and documented trainings which were to be carried out internally throughout the year 2020/2021. The training conducted for all employees, contractors, and their employees. The trainings were on Safety and on SOP like Vehicle maintenance, SOP by Stations, Toolbox, Working at Heights, working in Confined Space, Chemical handling, etc.</p> <p>Sighted some training has been done by the mill management to the respective workers are as follows:</p> <table border="1"> <thead> <tr> <th>Training</th> <th>Ladang Rompin POM</th> <th>Ladang Padang POM</th> </tr> </thead> <tbody> <tr> <td>Fire Fighting</td> <td>03/01/2021</td> <td>Scheduled</td> </tr> <tr> <td>Policy Training</td> <td>30/04/2021</td> <td>26/05/2021</td> </tr> <tr> <td>Chemical Handling Training</td> <td>31/01/2021</td> <td>Scheduled</td> </tr> </tbody> </table>	Training	Ladang Rompin POM	Ladang Padang POM	Fire Fighting	03/01/2021	Scheduled	Policy Training	30/04/2021	26/05/2021	Chemical Handling Training	31/01/2021	Scheduled	Complied
Training	Ladang Rompin POM	Ladang Padang POM													
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Criterion / Indicator		Assessment Findings			Compliance
		CPR & First Aid Training	07/01/2021	01/06/2021	
		PPE Training	02/03/2021	Scheduled	
		COVID-19 Awareness	19/05/2021	Scheduled	
		Sterilizer Station Training	Scheduled	24/04/2021	
		Press Station Training	Scheduled	04/02/2021	
<b>4.4.6.2</b>	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>Sighted training procedure refer MSPO-10 Rev: 0 dated 01/07/2018. Training need analysis for each worker has been established. From the training needs, they developed training program for the year 2021. Sighted Training Need Analysis dated 21/03/2021. Sighted Training Evaluation Form dated 09/03/2021.</p>			Complied
<b>4.4.6.3</b>	<p>A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure.</p> <p><b>- Minor compliance -</b></p>	<p>Training program has been made available to the audit team. Sighted the training listed as follow:</p> <ol style="list-style-type: none"> <li>1. Policy Briefing</li> <li>2. ERP &amp; First Aid Training</li> <li>3. PPE Training</li> <li>4. Safety Signboard Training</li> <li>5. Induction to new workers</li> <li>6. Working at height safety training</li> </ol>			Complied



Criterion / Indicator		Assessment Findings	Compliance															
		7. Hot and steam working area safety training 8. COVID-19 Awareness Training																
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>																		
<b>Criterion 4.5.1: Environmental Management Plan</b>																		
<b>4.5.1.1</b>	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.  <b>- Major compliance -</b>	Seong Thye Plantations Sdn Bhd has developed Environmental Policy on 02/01/2019, which was endorsed by their Executive Chairman, Mr. Goh Wei Lei. The company is committed to implement the good practices in line with their objective.  For Ladang Rompin POM, briefing on the sustainable policy was made on 30/04/2021, delivered by Mr. Mohd Hambali Jusoh. Briefing record was sighted.  For Ladang Padang POM, briefing on the sustainable policy was made on 26/05/2021, delivered by Mr. Ihsan Sabri. Briefing record was sighted.  Environmental management aspect impact analysis was made available to the audit team. Assessment dated on 05/02/2021.	Complied															
		<table border="1"> <thead> <tr> <th>No</th> <th>Operation</th> <th>Env. Aspect</th> <th>Env. Impact</th> <th>Mitigation</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>All Operation</td> <td>Use of petrochemical for transportation</td> <td>Pollution to soil &amp; water course</td> <td>Schedule of service</td> </tr> <tr> <td>2</td> <td>Boiler station</td> <td>Emission of greenhouse gases</td> <td>Air pollution – Global warming</td> <td>Record</td> </tr> </tbody> </table>	No	Operation	Env. Aspect	Env. Impact	Mitigation	1	All Operation	Use of petrochemical for transportation	Pollution to soil & water course	Schedule of service	2	Boiler station	Emission of greenhouse gases	Air pollution – Global warming	Record	
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Criterion / Indicator		Assessment Findings					Compliance						
				from nitrogen fertilizer usage									
		3	Clinic	Disposal of clinical waste	Land pollution	Provide Yellow dustbin (Hazardous Bin)							
		4	Mill Operation	Disposal of scrap iron	Soil pollution	Recycle							
		5	Mill Store	Generation of Empty Chemical Container	Land pollution	Provide area for stacking							
<b>4.5.1.2</b>	<p>The environmental management plan shall cover the following:</p> <ul style="list-style-type: none"> <li>a) An environmental policy and objectives;</li> <li>b) The aspects and impacts analysis of all operations</li> </ul> <p><b>- Major compliance -</b></p>	<p>Ladang Rompin Palm Oil Mill</p> <p>Environmental Aspect Impact Analysis was made available to the audit team. The plan was prepared by Mr Muhammad Hambali Bin Jusoh, dated on 01/12/2020 and approved by Mr. Oh Chiow Suan. The plan also covers the environmental policy and objectives. Some of the aspects and impacts analysis of the operations are as follows:</p> <table border="1"> <thead> <tr> <th>Operation</th> <th>Aspect</th> <th>Impact</th> </tr> </thead> <tbody> <tr> <td>Mill housekeeping and cleaning</td> <td>Pollution of soil and water course</td> <td>Zero Burning practice and wastewater discharge to effluent ponds</td> </tr> </tbody> </table>					Operation	Aspect	Impact	Mill housekeeping and cleaning	Pollution of soil and water course	Zero Burning practice and wastewater discharge to effluent ponds	Complied
Operation	Aspect	Impact											
Mill housekeeping and cleaning	Pollution of soil and water course	Zero Burning practice and wastewater discharge to effluent ponds											

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		River polluted mill operation by effluent wastewater	Pollution of soil and water course	High hydraulic retention time by POME ponds and close monitoring on final discharge quality									
		Noise from the mill machineries during operation	Sound pollution	PPE provided to workers									
<p>Ladang Padang Palm Oil Mill</p> <p>Environmental Aspect Impact Analysis was made available to the audit team. The plan was prepared by Environmental Officer, dated on 16/03/2021 and approved by Mr. Tay Tong Yak. The plan also covers the environmental policy and objectives. Some of the aspects and impacts analysis of the operations are as follows:</p> <table border="1"> <thead> <tr> <th>Operation</th> <th>Aspect</th> <th>Impact</th> </tr> </thead> <tbody> <tr> <td>Domestic water</td> <td>Protection of water supply within the estate</td> <td>Good water quality</td> </tr> <tr> <td>Tractor for transporting</td> <td>Use of Petrochemical for</td> <td>Pollution of air.</td> </tr> </tbody> </table>						Operation	Aspect	Impact	Domestic water	Protection of water supply within the estate	Good water quality	Tractor for transporting	Use of Petrochemical for
Operation	Aspect	Impact											
Domestic water	Protection of water supply within the estate	Good water quality											
Tractor for transporting	Use of Petrochemical for	Pollution of air.											

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			transportation activities		
		Diesel tank	Oil spillage from diesel tank	Pollution of land	
<b>4.5.1.3</b>	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.</p> <p><b>- Major compliance -</b></p>	<p>Both Mills have implemented its environmental action plans, which was developed to mitigate negative impacts and improve positive impacts.</p> <p>The plans specify the responsible persons. Among the related plans sighted in the Rompin POM and Padang POM as per 4.5.1.1.</p> <p>Service booklet for mill tractor was made available to the audit team during the audit program. Sighted Record performance monitoring data/activities of cyclones.</p>			Complied
<b>4.5.1.4</b>	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p><b>- Minor compliance -</b></p>	<p>Programmes to promote positive impacts had been included in the continual improvement plan of both Mills. Sample of activities was 3R Programme by Padang POM.</p>			Complied
<b>4.5.1.5</b>	<p>An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives.</p> <p><b>- Major compliance -</b></p>	<p>Communications to the employees were through training sessions and briefings at muster grounds.</p> <p>Ladang Rompin POM: The latest trainings in relation to environment were conducted on 25/03/2021 for 16 participants. Refer "Taklimat Penyelenggaraan Effluen".</p>			Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Ladang Padang POM: The latest trainings in relation to environment were conducted on 13/01/2021 for 5 participants. Refer Scheduled Waste Training.	
<b>4.5.1.6</b>	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.  - <b>Major compliance</b> -	Seong Thye Plantations Sdn Bhd has developed Environmental Policy on 02/01/2019, which was endorsed by their Executive Chairman, Mr. Goh Wei Lei. The company is committed to implement the good practices in line with their objective.  Ladang Rompin Palm Oil Mill  Sighted evidence of Environmental Meeting. Refer Meeting Jawatankuasa Pemantauan Prestasi Alam Sekitar dated 10/03/2021 attended by 16 participants.  Ladang Padang Palm Oil Mill  Sighted evidence of Environmental Meeting. Refer Meeting Jawatankuasa Alam Sekitar, Keselamatan & Kesihatan Tempat Kerja dated 10/03/2021 attended by 18 participants.	Complied
<b>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</b>			
<b>4.5.2.1</b>	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period  - <b>Major compliance</b> -	Consumption of non-renewable energy was closely monitored by the management. Sighted the diesel usage record for 2020 an 2021.  Consumption of non-renewable energy, Diesel, Petrol & Electricity, was monitored by both Mills. Records of diesel, petrol and electricity utilized were maintained and monitored. Refer Annual record of Non-Renewable Energy Source - Longitudinal Tracking vs Baseline 2020/2021.	Complied

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Criterion / Indicator		Assessment Findings	Compliance									
		<p>Ladang Rompin POM Diesel Consumption.</p> <table border="1"> <thead> <tr> <th>Item</th> <th>2020</th> <th>As at April 2021</th> </tr> </thead> <tbody> <tr> <td>Diesel Used</td> <td>142784</td> <td>41420</td> </tr> <tr> <td>MT/FFB</td> <td>6.23</td> <td>3.31</td> </tr> </tbody> </table> <p>Electricity sources comes from either TNB (Rompin POM) or boiler operation. As for the residential area, the supply is from TNB whilst for mill operation, the main supply is from the boiler and TNB.</p>	Item	2020	As at April 2021	Diesel Used	142784	41420	MT/FFB	6.23	3.31	
Item	2020	As at April 2021										
Diesel Used	142784	41420										
MT/FFB	6.23	3.31										
<b>4.5.2.2</b>	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>The estimation of the direct usage of non-renewable is tabulated in their annual budget. This is including the estimation of diesel, water, petrol and electric supply. Sighted the annual budget report year 2021 for both complex. Sighted Electricity Bills Fee For the month of April and May 2021. Refer Annual record of Non-Renewable Energy Source - Longitudinal Tracking vs Baseline 2020/2021.</p>	Complied									
<b>4.5.2.3</b>	<p>The use of renewable energy should be applied where possible.</p> <p><b>- Minor compliance -</b></p>	<p>Empty fruit bunch and solar system are used in the compound. EFB is used to fuel up the boiler whilst the solar system is used to supply electricity to post guard.</p>	Complied									
<b>Criterion 4.5.3: Waste management and disposal</b>												
<b>4.5.3.1</b>	<p>All waste products and sources of pollution shall be identified and documented.</p> <p><b>- Major compliance -</b></p>	<p>The company has established waste management procedure refer MSPO-P5-C3 Rev 0 dated 01/07/2018. They have identified 4 type of waste which are scheduled waste, domestic waste, industry waste and solid waste.</p>	Complied									

Criterion / Indicator		Assessment Findings	Compliance
4.5.3.2	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <p>a) Identifying and monitoring sources of waste and pollution.</p> <p>b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p><b>- Major compliance -</b></p>	<p>The mill management has developed a waste management procedure and plan.</p> <p>Domestic waste disposed in the landfill inside the estate compound whilst the scheduled waste is disposed through licensed contractor.</p> <p>The management fully utilize their by-products such as empty fruit bunch by converting them into land application for moisture conserve.</p>	Complied
4.5.3.3	<p>The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p><b>- Major compliance -</b></p>	<p>Management has established 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. Refer Procedure Stor Penyimpanan Barang Terjadual.</p> <p>The disposal records were made available and reviewed by the audit team.</p> <p>Ladang Rompin POM: E-SWISS: Refer Inventory No. 0609C3382641132021 with File reference number AS:CR31/152/000/002 dated 01/03/2021</p> <p>Ladang Padang POM: E-SWISS: File reference number AS(B)J31/152/000/027 dated 30/05/2021. Padang POM has been get an Approval for Extension Storing of schedule waste from DOE Kluang as per reference letter AS(B)J31/152/000/027 dated 29/03/2021.</p>	Complied
4.5.3.4	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.</p>	<p>Domestic waste disposed at landfill in the estate compound. Sighted document "Rekod Pungutan Sampah Domestic 2021"</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance																				
- Minor compliance -																							
<b>Criterion 4.5.4:</b> Reduction of pollution and emission																							
4.5.4.1	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.</p> <p>- Major compliance -</p>	<p>Ladang Rompin Palm Oil Mill and Ladang Padang Palm Oil Mill</p> <p>Greenhouse gas Management Plan 2021 was made available to the audit team. The plan is combined with estate and mill. Among the sources of GHG assessed are:</p> <table border="1"> <thead> <tr> <th>No</th> <th>Sources of GHG</th> <th>Impact</th> <th>Action Taken</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Emission of GHG from nitrogen fertilizer usage</td> <td>Contributes to global warming</td> <td>Following recommendation from agronomist</td> </tr> <tr> <td>2</td> <td>Emission from generation of electrical supply</td> <td>Global warming</td> <td>Ensure regular maintenance</td> </tr> <tr> <td>3</td> <td>Emission from boiler for electrical and steam supply</td> <td>Global warming</td> <td>Ensure regular maintenance</td> </tr> <tr> <td>4</td> <td>Emission from effluent systems</td> <td>Global warming</td> <td>Use biogas system to trap methane gas as fuel</td> </tr> </tbody> </table>	No	Sources of GHG	Impact	Action Taken	1	Emission of GHG from nitrogen fertilizer usage	Contributes to global warming	Following recommendation from agronomist	2	Emission from generation of electrical supply	Global warming	Ensure regular maintenance	3	Emission from boiler for electrical and steam supply	Global warming	Ensure regular maintenance	4	Emission from effluent systems	Global warming	Use biogas system to trap methane gas as fuel	Complied
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4.5.4.2	<p>An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p> <p>- Major compliance -</p>	<p>Action plan to reduce identified significant pollutants and emission has been identified in the environmental management plan. Samples:</p>	Complied																				



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		No	Activity	Pollution	Mitigation Measure	Monitoring Programme	
		1	Mill workshop	Land, Air, Soil	Schedule of Service	Service record	
		2	Effluent Pond	Methane gas to air	Control the operation	Record	
		3	Engine room	Sound	Schedule of maintenance	Record	
<b>4.5.4.3</b>	<p>Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p><b>- Major compliance -</b></p>	<p>POME performance monitoring was conducted in weekly basis. For Ladang Rompin POM, Sighted the lab test report conducted by Nalco Industrial Services Malaysia Sdn Bhd. The latest lab report was received on 23/03/2021. Verified that the Parameters was in line with Jadual Pematuhan Lesen No: 004158. Refer Certificate of analysis AW/95/41/21 dated 23/03/2021 and AW/95/72/21 dated 28/05/2021.</p> <p>For Ladang Padang POM, Sighted the lab test report conducted by ENVILAB Sdn Bhd. The latest lab report was received on 12/04/2021. Verified that the Parameters was in line with Jadual Pematuhan Lesen No: 004788. Refer Certificate of analysis Seong/E/N22744(A-F).</p>					Complied
<b>Criterion 4.5.5:</b> Natural water resources							

Criterion / Indicator	Assessment Findings	Compliance
<p><b>4.5.5.1</b> The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> <li>a) Assessment of water usage and sources.</li> <li>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.</li> <li>c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</li> </ul> <p><b>- Major compliance -</b></p>	<p>Sighted Procedure Water Management Plan MSPO-P5-C5 Rev. 1.01 dated 30/08/2018. The mill management has established water management plan in order to maintain good quality and availability of natural water resources. Water management plan for both complexes has been made available and reviewed during the audit session</p> <ul style="list-style-type: none"> <li>a. Water consumption assessment record was made available to the audit team. Refer Monthly water usage record 2021. Refer MSPO-P5-3 Water management.</li> <li>b. Water sampling was conducted once a year. For Rompin POM, Refer Drinking Water Analysis dated 19/04/2021 with document number SW227601 conducted by ECOLAB. Refer Estate Treated Water Analysis dated 13/04/2021 with document number AW/95/62/21 conducted by NALCO Water Ecolab. For Padang POM Refer Certificate of Analysis dated 10/02/2021 with reference number Seong/E/N22744(A-F) conducted by ENVILAB Sdn Bhd.</li> <li>c. Among the action plan taken to optimize the water consumption are regular piping maintenance, continuous education to the workers and monitoring.</li> </ul>	<p>Complied</p>
<p><b>4.5.5.2</b> Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.</p> <p><b>- Major compliance -</b></p>	<p>Ladang Rompin Palm Oil Mill</p> <p>POME discharged by the Rompin Mill is accordance with the Jadual Pematuhan. Refer Lab Report AW/95/72/21 dated 28/05/2021.</p> <p>Ladang Padang Palm Oil Mill</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		POME was discharged for the land application (furrow system) in Ladang Padang.	
<b>4.6 Principle 6: Best Practices</b>			
<b>Criterion 4.6.1: Mill Management</b>			
<b>4.6.1.1</b>	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.  - <b>Major compliance</b> -	Seong Thye Plantations Sdn Bhd had established and documented the Standard Operations Procedures for Palm Oil Mills, ver. 3.0, dated 2019. The Sections covered were:  1. Mill Processing Operations. 2. Operations of Process Machinery & Equipment 3. Mill Maintenance & Upkeeping 4. Chemicals Safety.  The SOPs were consistently implemented and monitored via monthly progress & production reports, report accounts and by visits by Chief Operating Officer & Chief Engineer.	Complied
<b>4.6.1.2</b>	All palm oil mills shall implement best practices.  - <b>Major compliance</b> -	Based on interview, both palm oil mills have implemented best management practices in their premises and consistently monitored their daily operations. Sighted evidence of training and awareness briefing has been conducted by the management related all operations. Refer Training record, Training evaluation form and training need analysis Rompin POM and Padang POM.	Complied
<b>Criterion 4.6.2: Economic and financial viability plan</b>			

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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.  - <b>Major compliance</b> -	Documented Business plan/budget were available on both Mills for 2021. Attention was given to CPO projection, cost of production, cost per ton and per hectare. The cost of production was reviewed and compared against expenditure each year with projections in place for future years. Refer FY2021 Proposed Capital Expenditure (CAPEX) Rompin POM and Padang POM.	Complied
<b>Criterion 4.6.3:</b> Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented.  - <b>Major compliance</b> -	Pricing mechanism for both mill products mainly crude palm oil (CPO) and palm kernel (PK) were based on MPOB prices. Sighted sample provided for latest CPO and PK prices dated 3/5/2021.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.  - <b>Major compliance</b> -	Contracts are fair, legal and transparent as per sample sighted for FFB purchase agreement between Padang POM and Garisanemas Plantation Sdn. Bhd. dated 1/2/2021. Payment are made timely as per sample sighted for April 2021 FFB purchased paid on 5/5/2021.	Complied
<b>Criterion 4.6.4:</b> Contractor			
4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.  - <b>Major compliance</b> -	Documentation and information established as Control Points for Contractor; Doc. # MSPO-11; Date; 11/9/2018 were provided to contractors through contract agreements for sample contractor as following:  - Teo Tuan Kwee Sdn. Bhd.; Transport Agreement; Signed date: 1/1/2021  - Sing Chuan Aik Transport Sdn. Bhd.; Transport Agreement; Dated 1/1/2021	Complied

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4.6.4.2	<p>The management shall provide evidence of agreed contracts with the contractor.</p> <p><b>- Major compliance -</b></p>	<p>Evidence of agreed contract agreements provided for sample contractor as following:</p> <ul style="list-style-type: none"> <li>- Teo Tuan Kwee Sdn. Bhd.; Transport Agreement; Signed date: 1/1/2021</li> <li>- Sing Chuan Aik Transport Sdn. Bhd.; Transport Agreement; Dated 1/1/2021</li> </ul>	Complied
4.6.4.3	<p>The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.</p> <p><b>- Minor compliance -</b></p>	<p>Rompin Mill &amp; Padang Mill has included the requirement for the transporter to allow the company and its assigned third parties to interview members of the workforce and inspect the transporter's premises, for assurance of compliance with the company's requirements, including the MSPO standards in the transport agreement sighted as per indicator 4.6.4.2 above.</p>	Complied

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

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	A policy for the implementation of MSPO shall be established. <b>- Major compliance -</b>	The policy for the implementation of MSPO established as Sustainability Policy; Dated 2/1/2019; Signed by the Executive Chairman of Seong Thye Plantations Sdn. Bhd.	Complied
<b>4.1.1.2</b>	The policy shall also emphasize commitment to continual improvement. <b>- Major compliance -</b>	The Sustainability Policy has emphasized on the continuous review and improve of operations related to social, environmental and economic sustainability guided by the principles of MSPO and best practices of industry. Latest briefing conducted by Rompin Estate management to workers was on 5/4/2021 while for Padang Estate was on 2/6/2021 and Viva Estate on 8/12/2020.	Complied
<b>Criterion 4.1.2 – Internal Audit</b>			
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. <b>- Major compliance -</b>	An Annual Internal Audit Plan based on Appendix 1 of MSPO Internal Audit Procedure was established for the year 2021. The plan also included with Audit Schedule as per Appendix 2 of the procedure which defined the audit scope and criteria for audit to be conducted in respective operating units.	Complied
<b>4.1.2.2</b>	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to	Based on the MSPO Internal Audit Procedure; MSPO-P1-C2; Rev. 1.02; Dated 1/3/2021, the internal audit was conducted as per plan reported in the MSPO Audit Forms for the latest audit conducted as following: - Rompin Estate; Date: 7/4/2021	Complied

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	implement the necessary corrective action. - <b>Major compliance</b> -	- Viva Estate; Date: 8/4/2021 - Padang Estate; Date: 29/4/2021	
4.1.2.3	Report shall be made available to the management for their review. - <b>Major compliance</b> -	Report available as per MSPO Audit Forms above. No findings in all sites audited.	Complied
<b>Criterion 4.1.3 – Management Review</b>			
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. - <b>Major compliance</b> -	Latest management review meeting was conducted on 24/5/2021 which documented in the Appendix 2 of Management Review Procedure as Continuous Improvement Plan following the outcome of internal audit findings. Expected date of completion of the plan was on 30/5/2021.	Complied
<b>Criterion 4.1.4 – Continual Improvement</b>			
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. - <b>Major compliance</b> -	All estates developed a continuous improvement plan involving operational, environmental and workers livelihood improvement opportunities as per sample as following: - Introducing of <i>Cantas</i> machine - Instruction of interpump use - Repair of house roofing for all labour quarters - Mechanised FFB collection - Mechanised loose fruit collection	Complied

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4.1.4.2	The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption.  - Major compliance -	All estates has adopted Seong Thye Plantation's established MSPO Procedure Titled: Latest Technology and Systems, Standards and Practices; Ref. # MSPO-P1-2; Version 1.00; Date: 1/1/2019 as part of the Management Commitment & Responsibility - Continual Improvement documentation.  Sighted sample Records of CAPEX 2021 indicated that Rompin Estate has allocated a purchase of new Tractor Mounted Motor Grader to replace the old unit in Gayung Division.	Complied
4.1.4.3	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established.  - Major compliance -	As a sample, action plan in-line with the newly purchased of Tractor Mounted Motor Grader, Rompin Estate has conducted training on Operational and Safe Handling of New Vehicle to relevant workers on 21/1/2021.	Complied
<b>4.2 Principle 2: Transparency</b>			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes.  - Major compliance -	All estates documented information related to stakeholder requests in the Request Form-MSPO Related; Appendix 4 of Information Stakeholder Consultation & Communication Procedure. No requests received from external stakeholder since the last audit.	Complied
4.2.1.2	Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where	All estates adopted Seong Thye Plantations' enlisted List of Public Documents Available for MSPO Stakeholder Inspection; MSPO-P2-C1;	Complied



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	disclosure of information would result in negative environmental or social outcomes. <b>- Major compliance -</b>	Version control: 1.00; Date: 1/1/2019 as part of transparency commitment with categories of documents as following:  <ul style="list-style-type: none"> <li>- All MSPO Policies and Licences</li> <li>- Safety and health plan</li> <li>- Plans and impact assessment relating to social impact</li> <li>- Plans and impact assessment relating to environmental impact</li> <li>- Pollution prevention plan</li> <li>- Records of complaints and grievances</li> <li>- Continual improvement plan</li> <li>- Others</li> </ul>	
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<b>4.2.2.1</b>	Procedures shall be established for consultation and communication with the relevant stakeholders. <b>- Major compliance -</b>	All estates established the Stakeholder Communication & Consultation Procedure; MSPO-P2-C2; Rev. 1.02; Dated 8/5/2019 for consultation and communication with relevant stakeholders.	Complied
<b>4.2.2.2</b>	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. <b>- Minor compliance -</b>	Based on the established organization structure of MSPO Standard Committee 2021, the management of Rompin and Viva Estate nominated the following:  <ul style="list-style-type: none"> <li>- Mr. Sik Yong Thai (Assistant Manager) as Internal &amp; External Communication (Transparency) Officer</li> <li>- Mr. Selamat Bin Basar (Field Conductor) as Complaints &amp; Grievances Officer</li> </ul> Padang Estate nominated the following:  <ul style="list-style-type: none"> <li>- Mr. Choong Jing Hui (Assistant Manager) as the MSPO Committee Transparency, Traceability and Complaints &amp; Grievances Officer</li> </ul>	Complied

Criterion / Indicator		Assessment Findings	Compliance																
<b>4.2.2.3</b>	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.  - <b>Major compliance</b> -	A list of stakeholders documented in the Appendix 1 of Stakeholder Consultation & Communication Procedure as Stakeholders List latest updated on 8/3/2021 for Rompin Estate.  Based on minutes of meeting record, latest external stakeholder meeting for Rompin Estate was conducted on 18/3/2021 with attendance from neighbouring estate representative, Balai Polis Rompin representative as well as suppliers and contractors' representatives.  Viva Estate stakeholder meeting was latest conducted on 25/3/2021.  Padang Estate consulted its stakeholders indirectly as per sample acknowledgement by Wildlife Department Kluang (Authority) and Perniagaan Seri Dinding (Vendor).	Complied																
<b>Criterion 4.2.3 – Traceability</b>																			
<b>4.2.3.1</b>	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s).  - <b>Major compliance</b> -	The Traceability procedure namely Survey of Workflow for Traceability, version 1, revision 1.01 dated 30.08.2018 is available from planting to CPO/PK dispatch.  The following information is available in the weighbridge ticket and/or DO for FFB supplied from Ladang Rompin, Ladang Viva, Ladang Padang).  Ladang Rompin - FFB <table border="1"> <tr> <td>Date</td> <td>30/11/2020</td> <td>31/03/2021</td> <td>31/01/2021</td> </tr> <tr> <td>Ticket No.</td> <td>357110</td> <td>361798</td> <td>359530</td> </tr> <tr> <td>Lorry No.</td> <td>WFH4431</td> <td>MD3884</td> <td>CCV3399</td> </tr> <tr> <td>Weight</td> <td>5.59 MT</td> <td>5.34 MT</td> <td>8.83 MT</td> </tr> </table>	Date	30/11/2020	31/03/2021	31/01/2021	Ticket No.	357110	361798	359530	Lorry No.	WFH4431	MD3884	CCV3399	Weight	5.59 MT	5.34 MT	8.83 MT	Complied
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		<p>Ladang Viva - FFB</p> <table border="1"> <tr> <td>Date</td> <td>30/04/20121</td> <td>28/01/2021</td> <td>24/11/2020</td> </tr> <tr> <td>Ticket No.</td> <td>00149972</td> <td>00148059</td> <td>00138928</td> </tr> <tr> <td>Lorry No.</td> <td>TR8049</td> <td>CAK4547</td> <td>CAK4547</td> </tr> <tr> <td>Weight</td> <td>2.46 MT</td> <td>4.39 MT</td> <td>7.39 MT</td> </tr> </table> <p>Ladang Padang - FFB</p> <table border="1"> <tr> <td>Date</td> <td>29/03/2021</td> <td>31/01/2021</td> <td>31/03/2021</td> </tr> <tr> <td>Ticket No.</td> <td>213474</td> <td>212110</td> <td>213345</td> </tr> <tr> <td>Lorry No.</td> <td>KINTA5</td> <td>NBC7839</td> <td>PGQ2757</td> </tr> <tr> <td>Weight</td> <td>10.29 MT</td> <td>34.62 MT</td> <td>40.57</td> </tr> </table> <ul style="list-style-type: none"> <li>- Date of weighing</li> <li>- Gross/tare/net weight</li> <li>- Contract no. (e.g. Long Term 05/19)</li> <li>- Weighbridge ticket no.</li> <li>- Description of content (CPO or PK)</li> <li>- Vehicle no.</li> <li>- Name of driver (in DO)</li> <li>- Time in &amp; out</li> <li>- Seal No.</li> <li>- MPOB form (ref. To seal No. and DO no.)</li> <li>- MSPO certificate no and validity: MSPO 712227 (25/06/2024)</li> </ul>	Date	30/04/20121	28/01/2021	24/11/2020	Ticket No.	00149972	00148059	00138928	Lorry No.	TR8049	CAK4547	CAK4547	Weight	2.46 MT	4.39 MT	7.39 MT	Date	29/03/2021	31/01/2021	31/03/2021	Ticket No.	213474	212110	213345	Lorry No.	KINTA5	NBC7839	PGQ2757	Weight	10.29 MT	34.62 MT	40.57	
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<b>4.2.3.2</b>	<p>The management shall conduct regular inspections on compliance with the established traceability system.</p> <p><b>- Major compliance -</b></p>	<p>The management has made the check on the traceability from planting to CPO/PK dispatch through PIMS system. Sighted the check conducted visiting from respective Estate Managers.</p>	Complied																																

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Criterion / Indicator		Assessment Findings	Compliance																																																
<b>4.2.3.3</b>	The management should identify and assign suitable employees to implement and maintain the traceability system. <b>- Minor compliance -</b>	The traceability MSPO Committee Officer is Ms Kanageswary on 01.01.2021 (Ladang Rompin and Ladang Viva) and Mr Choong Jing Hui (Ladang Padang) on 01.01.2019. Among the roles and responsibility are:  1. Keep abreast of changes to relevant MSPO requirement 2. Review relevant MSPO requirement. 3. Review compliance in fact and in documentation	Complied																																																
<b>4.2.3.4</b>	Records of sales, delivery or transportation of FFB shall be maintained. <b>- Major compliance -</b>	<p>Ladang Rompin - FFB</p> <table border="1"> <tr> <td>Date</td> <td>30/11/2020</td> <td>31/03/2021</td> <td>31/01/2021</td> </tr> <tr> <td>Ticket No.</td> <td>357110</td> <td>361798</td> <td>359530</td> </tr> <tr> <td>Lorry No.</td> <td>WFH4431</td> <td>MD3884</td> <td>CCV3399</td> </tr> <tr> <td>Weight</td> <td>5.59 MT</td> <td>5.34 MT</td> <td>8.83 MT</td> </tr> </table> <p>Ladang Viva - FFB</p> <table border="1"> <tr> <td>Date</td> <td>30/04/20121</td> <td>28/01/2021</td> <td>24/11/2020</td> </tr> <tr> <td>Ticket No.</td> <td>00149972</td> <td>00148059</td> <td>00138928</td> </tr> <tr> <td>Lorry No.</td> <td>TR8049</td> <td>CAK4547</td> <td>CAK4547</td> </tr> <tr> <td>Weight</td> <td>2.46 MT</td> <td>4.39 MT</td> <td>7.39 MT</td> </tr> </table> <p>Ladang Padang - FFB</p> <table border="1"> <tr> <td>Date</td> <td>29/03/2021</td> <td>31/01/2021</td> <td>31/03/2021</td> </tr> <tr> <td>Ticket No.</td> <td>213474</td> <td>212110</td> <td>213345</td> </tr> <tr> <td>Lorry No.</td> <td>KINTA5</td> <td>NBC7839</td> <td>PGQ2757</td> </tr> <tr> <td>Weight</td> <td>10.29 MT</td> <td>34.62 MT</td> <td>40.57</td> </tr> </table> <p>- Date of weighing - Gross/tare/net weight</p>	Date	30/11/2020	31/03/2021	31/01/2021	Ticket No.	357110	361798	359530	Lorry No.	WFH4431	MD3884	CCV3399	Weight	5.59 MT	5.34 MT	8.83 MT	Date	30/04/20121	28/01/2021	24/11/2020	Ticket No.	00149972	00148059	00138928	Lorry No.	TR8049	CAK4547	CAK4547	Weight	2.46 MT	4.39 MT	7.39 MT	Date	29/03/2021	31/01/2021	31/03/2021	Ticket No.	213474	212110	213345	Lorry No.	KINTA5	NBC7839	PGQ2757	Weight	10.29 MT	34.62 MT	40.57	Complied
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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>- Contract no. (e.g. Long Term 05/19)</li> <li>- Weighbridge ticket no.</li> <li>- Description of content (CPO or PK)</li> <li>- Vehicle no.</li> <li>- Name of driver (in DO)</li> <li>- Time in &amp; out</li> <li>- Seal No.</li> <li>- MPOB form (ref. To seal No. and DO no.)</li> <li>- MSPO certificate no and validity: MSPO 712227 (25/06/2024)</li> </ul>	
<b>4.3 Principle 3: Compliance to legal requirements</b>			
<b>Criterion 4.3.1 – Regulatory requirements</b>			
<b>4.3.1.1</b>	<p>All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.</p> <p><b>- Major compliance -</b></p>	<p>Licenses and permit which comply to the laws and regulations were made available to the audit team. A mechanism to track down the expiry date of each permits and license has been developed and well monitored by the estate management. Sighted sample of the permits and license as below:</p> <p>Ladang Rompin</p> <ol style="list-style-type: none"> <li>1. MPOB license for Ladang Rompin expired on 30/09/2021, reference no: 502448202000.</li> <li>2. Permit form Suruhanjaya Tenaga Malaysia expired on 19/12/2021, reference no: PKN(P)00382001 Pemasang Persendirian 2019/0392.</li> <li>3. Permit from KPDM &amp; HEP for petrol, diesel and fertilizer expired on 13/12/2021, reference no: PHG/RPN/043/95 SK(D)</li> </ol>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Ladang Viva</p> <ol style="list-style-type: none"> <li>1. MPOB license for Ladang Viva expired on 31/10/2021, reference no: 604220002000.</li> <li>2. MPOB Licence Maxi Universal Sdn Bhd expired on 31/10/2025, reference no: 554065101000</li> </ol> <p>Ladang Padang</p> <ol style="list-style-type: none"> <li>1. MPOB license for Ladang Padang expired on 31/03/2022, reference no: 501483502000.</li> <li>2. Permit to Purchase, Store and Use of Sodium Hydroxide expired on 31/12/2021.</li> <li>3. Licence Melencong / Mengabstark Air Sungai, BAKAJ expired on 31/12/2021.</li> </ol>	
<b>4.3.1.2</b>	<p>The management shall list all laws applicable to their operations in a legal requirement register.</p> <p><b>- Major compliance -</b></p>	<p>The Company has established and updated list of applicable laws and regulations that are applicable for the estate and mill operation. The legal register is prepared by Sin Thye Management Sdn Bhd (HQ) and reviewed on 18/05/2021.</p> <p>It includes the following:</p> <ol style="list-style-type: none"> <li>1. Occupational Safety and Health Act 1994</li> <li>2. Pesticides Act 1974 (Act 149)</li> <li>3. Fire Service Act, 1984</li> <li>4. Environmental Quality Act 1974</li> <li>5. Workers' Minimum Standards of Housing and Amenities Act 1990 (Amendment 2020)</li> <li>6. Employment Act 1955</li> <li>7. Employee Provident Fund Act 1991</li> </ol>	Complied

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		8. Employees Social Security Act 1969 9. National Wage Consultative Council Act 2011, Minimum Wages Order 2020 10. Prevention and Control of Infectious Diseases Act 1988.	
<b>4.3.1.3</b>	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. <b>- Major compliance -</b>	Any amendments or new regulations coming into force will be updated by the Sin Thye Management Sdn Bhd team at headquarter level. The LORR has been reviewed on 18/05/2021.	Complied
<b>4.3.1.4</b>	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. <b>- Minor compliance -</b>	Sighted appointment letter on person in charge to monitor compliance and to track and update the changes in regulatory requirements.  Ladang Rompin: Mr Lim Kim Tong dated 01/01/2021 Ladang Viva: Mr Lim Kim Tong dated 01/01/2021 Ladang Padang: Mr Pang Hau Chin dated 01/01/2019	Complied
<b>Criterion 4.3.2 – Lands use rights</b>			
<b>4.3.2.1</b>	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. <b>- Major compliance -</b>	Rompin Estate hold 3 land titles as following: - Land title # 5330; District: Rompin; Sub-district: Mukim Rompin; Lot # 5082; Area: 2,428 ha; Register date: 24/2/2004 - Land title # 1321; District: Rompin; Sub-district: Mukim Rompin; Lot # 2663; Area: 2.025 ha; Register date: 17/3/2008 - Land title # 5468; District: Rompin; Sub-district: Mukim Rompin; Lot # 3244; Area: 610.6 ha; Register date: 4/6/2004  Viva Estate hold 15 land titles as per sample as following:	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>- Land title # 98135; District: Mersing; Sub-district: Mukim Mersing; Lot # 2274; Area: 3.5106 ha; Register date: 12/3/2008</li> <li>- Land title # 98136; District: Mersing; Sub-district: Mukim Mersing; Lot # 2275; Area: 4.0494 ha; Register date: 8/11/2005</li> <li>- Land title # 98137; District: Mersing; Sub-district: Mukim Mersing; Lot # 2276; Area: 4.0519 ha; Register date: 8/11/2005</li> </ul> <p>Padang Estate hold a single land title as following:</p> <ul style="list-style-type: none"> <li>- Land title # 37218; District: Kluang; Sub-district: Mukim Kahang; Lot # 3222; Area: 2,226 ha; Register date: 30/11/2008</li> </ul>	
<b>4.3.2.2</b>	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.</p> <p><b>- Major compliance -</b></p>	<p>Documents showing legal ownership, history of land tenure and the actual legal use of the land provided by management as sighted in indicator 4.3.2.1 above.</p>	Complied
<b>4.3.2.3</b>	<p>Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p> <p><b>- Major compliance -</b></p>	<p>Rompin Estate demarcated its area with boundary pegs as illustrate in documented Rompin – Full Map 2021 GARMIN. Photographic evidence of sample boundary pegs shown the following:</p> <ul style="list-style-type: none"> <li>- Boundary peg # ST72 within field # M2 as a boundary to Pineapple farm</li> <li>- Boundary peg # ST64 within field # M2 as a boundary to Pineapple farm</li> <li>- Viva Estate sample boundary peg #ME10 as a boundary to ILP Mersing.</li> </ul>	Complied



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		- Padang Estate sample boundary peg # STP123 within field block # TK3 as a boundary to neighbouring Ladang Mutiara.	
<b>4.3.2.4</b>	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).  - <b>Minor compliance</b> -	Based on documentations and consultation, no disputes issues occur since the last audit. In case of any, the process will be handle based on the established Free Prior Informed Consent (FPIC) Procedure; MSPO-P3-C2; Revisions:1.01; Date: 22 May 2019.	Complied
<b>Criterion 4.3.3 – Customary rights</b>			
<b>4.3.3.1</b>	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.  - <b>Major compliance</b> -	The land for all estates were not encumbered by customary rights. In case of any, the process will be demonstrated based on the established Free Prior Informed Consent (FPIC) Procedure; MSPO-P3-C2; Revisions:1.01; Date: 22 May 2019.	Complied
<b>4.3.3.2</b>	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available.  - <b>Minor compliance</b> -	Maps of all estates available with appropriate scale showing boundaries of each estates' land.	Complied
<b>4.3.3.3</b>	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available.  - <b>Major compliance</b> -	Based on documentations and consultation, no disputes issues occur since the last audit. In case of any, the process will be handle based on the established Free Prior Informed Consent (FPIC) Procedure; MSPO-P3-C2; Revisions:1.01; Date: 22 May 2019.	Complied
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			

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Criterion / Indicator		Assessment Findings	Compliance									
<p><b>4.4.1.1</b></p>	<p>Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.</p> <p><b>- Minor compliance -</b></p>	<p>Both Rompin Estate and Viva Estate as well as Padang Estate established the Social Impact Assessment Questionnaire (SIA) to conduct the assessment through consultation with stakeholders. Sighted sample records as following:</p> <ul style="list-style-type: none"> <li>- External Stakeholder – Environmental Aspect Impact Assessment (EIA) Plan; 1/12/2020 Rompin &amp; Viva Estate.</li> <li>- External Stakeholder – Social Aspect Impact Assessment (SIA) Questionnaire; 18/3/2021 Rompin &amp; Viva POM.</li> </ul> <p>Latest assessment for Padang Estate was conducted on 17/3/2021 with internal stakeholders among all employees whilst external stakeholders’ consultation was conducted through letters since to unable to meet due to COVID-19 pandemic.</p> <p>Based on the consultation, aspects and impacts identified from stakeholders’ feedbacks were planned to be taken action with Social Impact Assessment Plan (SIA) Ladang Padang POM &amp; Estate established. Among identified issues taken action are as per sample as following:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 35%;">Issues</th> <th style="width: 40%;">Mitigation measure</th> <th style="width: 25%;">Deadline</th> </tr> </thead> <tbody> <tr> <td>Housing condition not conducive. Some of the furniture worn out and the electrical appliances is broken down.</td> <td>Management will schedule the maintenance work to be carry out in 3 months’ time.</td> <td>July 2021</td> </tr> <tr> <td>The canteen does not serve the need and demand of the estate</td> <td>Management will discuss the need of worker with the canteen operator and</td> <td>July 2021</td> </tr> </tbody> </table>	Issues	Mitigation measure	Deadline	Housing condition not conducive. Some of the furniture worn out and the electrical appliances is broken down.	Management will schedule the maintenance work to be carry out in 3 months’ time.	July 2021	The canteen does not serve the need and demand of the estate	Management will discuss the need of worker with the canteen operator and	July 2021	<p>Complied</p>
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		community. (transparency on the price tag).	give them 3 months' time to indicate the price list		
<b>Criterion 4.4.2: Complaints and grievances</b>					
<b>4.4.2.1</b>	A system for dealing with complaints and grievances shall be established and documented. <b>- Major compliance -</b>	A system for dealing with complaints and grievances in all estates established and documented as Grievance & Complaints Handling Procedure; MPSO-P4-C2; Rev. 1.01; Dated 8/5/2019.			Complied
<b>4.4.2.2</b>	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. <b>- Major compliance -</b>	The system able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties.  Sample latest complaints received from internal stakeholder among worker relate to housing repair for house # B1 dated on 9/4/2021 and house # B10 dated on 19/4/2021. Both complaints resolved by Padang Estate management on 21/4/2021 and 28/4/2021 respectively.			Complied
<b>4.4.2.3</b>	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. <b>- Minor compliance -</b>	Complaints made available in documented records of Grievances/Complaints Form as the Appendix 3 of Stakeholder Consultation & Communication Procedure. Sighted sample records of complaints as following:  - Septic tank cover broke; Date: 8/4/2021; Resolved date: 9/4/2021 - Water pipe leaks; Date: 21/4/2021; Resolved date: 21/4/2021 - Electrical appliances for repair house # 61; Date: 28/4/2021; Resolved date: 2/5/2021			Complied
<b>4.4.2.4</b>	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.	Training of Grievances & Complaints Handling Procedure was latest conducted by the management for employees of Rompin and Viva Estate on 4/1/2021.			Complied

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	- <b>Minor compliance</b> -	<p>Communications to external stakeholder of Rompin and Viva Estate was last conducted during meeting on 18/3/2021 with attendance from neighbouring estate representative, Balai Polis Rompin representative as well as suppliers and contractors' representatives.</p> <p>For Padang Estate, a letter dated 8/4/2021 was sent to external stakeholders for cancellation of stakeholder meeting notice due to COVID-19 pandemic and MCO. To obtain feedbacks, as set of documents were attached with the notice including feedback form, MSPO policy and acknowledgement received etc. Sighted sample acknowledgement by stakeholders i.e. Kluang Wildlife Department and Perniagaan Seri Dinding shown no negative feedbacks from them.</p>	
<b>4.4.2.5</b>	<p>Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request.</p> <p>- <b>Major compliance</b> -</p>	<p>Complaints and solutions within the past 24 months were documented and available as per sample as following:</p> <ul style="list-style-type: none"> <li>- Rompin Estate: Punctured in ceiling for Security Guard house; Date: 21/6/2019; Resolved date: 23/6/2019</li> <li>- Padang Estate: Drywood termites infestation on toilet door; Date: 26/3/2019; Resolved date: 1/5/2019</li> </ul>	Complied
<b>Criterion 4.4.3: Commitment to contribute to local sustainable development</b>			
<b>4.4.3.1</b>	<p>Growers should contribute to local development in consultation with the local communities.</p> <p>- <b>Minor compliance</b> -</p>	<p>Latest contribution made by Rompin and Viva Estate was distribution of meat, chicken and eggs in conjunction with Hari Raya 2021; dated 6/5/2021.</p> <p>Padang Estate has participated in local dirt road maintenance committee with annual contribution for 25km of road maintenance. The mill provides vehicles for this purpose (e.g. tractors and trailers/shovel loader/backhoe loader).</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance	
<b>Criterion 4.4.4: Employees safety and health</b>			
<b>4.4.4.1</b>	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.  <b>- Major compliance -</b>	The management has established Occupational Safety & Health Policy which was signed by the Executive Chairman Mr. Goh Wei Lei on 13/05/2019.  OSH policy was communicated thru a briefing conducted on: Ladang Rompin: 05/04/2021 by Mr Raja Saifuldin Ladang Viva: 05/04/2021 by Mr Raja Saifuldin Ladang Padang: 02/06/2021 by Mr Ihsan Sabri	Complied
<b>4.4.4.2</b>	The occupational safety and health plan shall cover the following: a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as	a. The company has established the OSH policy and communicated to respective estates accordingly. Ladang Rompin: 05/04/2021 by Mr Raja Saifuldin Ladang Viva: 05/04/2021 by Mr Raja Saifuldin Ladang Padang: 02/06/2021 by Mr Ihsan Sabri  b. Sighted HIRARC has been prepared by Ladang Rompin, Ladang Viva and Ladang Padang as per their operation. The risks of all operations had been assessed and documented. It covered activities like chemical spray, applying fertilizer, harvesting, fertilizer received and issuance, circle raking, transporting and driving tractor.  Ladang Rompin HIRARC reviewed on 21/01/2021 Ladang Viva HIRARC reviewed on 21/01/2021	Complied

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<p>identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p>	<p>Ladang Padang HIRARC reviewed on 19/01/2021</p> <p>c. Sighted OSH plan has been prepared by Ladang Rompin, Ladang Viva and Ladang Padang. Training program and awareness for both estates are well planned their Annual Training Program 2021. The program includes the training for spraying, chemical safety management, PPE training and heavy vehicle training. Site visit to the spraying site shows that the workers complying with the estate regulation.</p> <p>Ladang Rompin</p> <ol style="list-style-type: none"> <li>1. Fire Fighting dated 03/01/2021</li> <li>2. CPR First Aid Training dated 07/01/2021</li> <li>3. PPE Training dated 02/03/2021</li> </ol> <p>Ladang Viva</p> <ol style="list-style-type: none"> <li>1. SOP Fertilizer Store on 20/04/2021</li> <li>2. SOP on PPE on 09/03/2021</li> <li>3. Chemical Mixing SOP on 26/02/2021</li> </ol> <p>Ladang Padang</p> <ol style="list-style-type: none"> <li>1. Manuring Training dated 16/04/2021</li> <li>2. SCCS Training dated 01/03/2021</li> <li>3. Policy Training dated 02/06/2021</li> </ol> <p>d. Logbook for PPE issuance was made available to the audit team. Among the PPE issued to the workers are safety shoes, safety kit, seal kit hardness, yellow rubber boot, safety leather hand gloves and long glove, safety mask (respirator 3m) etc. Sighted sample receiving PPE for Ladang Rompin on 19/01/2021, Ladang Viva on 21/01/2021 and Ladang Padang on 18/05/2021.</p>	

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	- Major compliance -	<p>e. The estate has established chemical handling procedure, released in 2019, version 3. The SOP details the guideline in handling the chemical in a safe manner as pe required by the laws. Sighted CHRA Assessment has been conducted. Refer CHRA report for Ladang Rompin dated 18/12/2018, Ladang Viva dated 19/11/2019, and Ladang Padang dated 11/02/2021. Sighted Medical Surveillance Report 2020 has been conducted as per recommendation by the Assessor. Latest JKPP visit sighted on 18/09/2020 for Ladang Rompin and Ladang Viva. Chemical register has been prepared on 18/03/2021 for Ladang Rompin and Ladang Viva.</p> <p>f. Estate management has appointed Person in charge for safety and health:</p> <ol style="list-style-type: none"> <li>Ladang Rompin: Ms Jivejothi A/P Achandro dated 01/01/2021</li> <li>Ladang Viva: Ms Jivejothi A/P Achandro dated 01/01/2021</li> <li>Ladang Padang: Mr Ihsan Sabri Hariyanto dated 01/01/2019</li> </ol> <p>g. The estate management has conducted regular meeting regarding on the OSH issues. Sighted evidence of minutes of meeting and attendance.</p> <table border="1"> <thead> <tr> <th>OSH Meeting</th> <th>Rompin Est.</th> <th>Viva Est.</th> <th>Padang Est.</th> </tr> </thead> <tbody> <tr> <td colspan="4">2020</td> </tr> <tr> <td>1<sup>st</sup> Meeting</td> <td>10/03/2020</td> <td>10/03/2020</td> <td>05/03/2021</td> </tr> </tbody> </table>	OSH Meeting	Rompin Est.	Viva Est.	Padang Est.	2020				1 <sup>st</sup> Meeting	10/03/2020	10/03/2020	05/03/2021	
OSH Meeting	Rompin Est.	Viva Est.	Padang Est.												
2020															
1 <sup>st</sup> Meeting	10/03/2020	10/03/2020	05/03/2021												

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		2 <sup>nd</sup> Meeting	02/06/2020	02/06/2020	30/06/2021	
		3 <sup>rd</sup> Meeting	08/09/2020	08/09/2020	17/09/2021	
		4 <sup>th</sup> Meeting	08/12/2020	08/12/2020	16/12/2021	
		2021				
		1 <sup>st</sup> Meeting	09/03/2021	09/03/2021	17/03/2021	
		<p>h. Based on interview verified that the workers could demonstrate fair understanding regarding on the accident and emergency procedure. For Ladang Rompin, sighted ERP, CPR and First Aid Training has been conducted on 22/05/2021. For Ladang Viva, ERP training has been conducted on 15/04/2021. For Ladang Padang, ERP Training has been conducted on 10/11/2020.</p> <p>i. First Aider has been nominated for Ladang Rompin, Ladang Viva and Ladang Padang. Sighted evidence for Ladang Rompin, Certificate of Proficiency dated 18/07/2020. Training conducted by Pertubuhan Latihan CPR Malaysia. First aid box was checked and found in order. Ladang Viva has conducted First aid Training for First Aid Holder on 07/01/2021. For Ladang Padang, First aid Training has been conducted on 01/06/2021.</p>				



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Criterion / Indicator		Assessment Findings	Compliance
		<p>j. Accident status has been reviewed during quarterly OSH meeting. The estate management has submitted their record of accident/death to Department of Safety and Health as below:</p> <p>Ladang Rompin: JKPP8/65354/2020 dated 02/01/2021</p> <p>Ladang Viva: JKPP8/65354/2020 dated 02/01/2021</p> <p>Ladang Padang: JKPP8/79474/2021 dated 29/01/2021</p>	
<b>Criterion 4.4.5: Employment conditions</b>			
<b>4.4.5.1</b>	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>Seong Thye Plantations Sdn. Bhd. established the Social and Human Rights Policy as a policy on good social practice regarding human rights in respect of industrial harmony dated 2/1/2019 and signed by company's Executive Chairman.</p> <p>Latest briefing conducted by Rompin Estate management to workers was on 5/4/2021 while for Padang Estate workers was on 26/5/2021 and Viva Estate on 8/12/2020.</p>	Complied
<b>4.4.5.2</b>	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p><b>- Major compliance -</b></p>	<p>All estates adopted the company's Human Rights and Social Policy dated 2/1/2019 that emphasized commitments towards good social practices in respect to human rights and industrial harmony.</p> <p>No evidence that the management engage in or support discriminatory practices. Interview conducted with sample workers confirmed that the company provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p>	Complied
<b>4.4.5.3</b>	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed</p>	<p>All estates management ensured that employees' pay and conditions met legal requirements as per Employment Act and Minimum Wages</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance																																										
<p>Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p><b>- Major compliance -</b></p>	<p>order. This confirmed through verification of sample work agreement, passport, work permit, detail payslip, checkroll &amp; attendance for Oct 2020, Dec 2020, Feb 2021 &amp; April 2021 as following:</p> <p>Rompin Estate:</p> <table border="1" data-bbox="1050 604 1733 1102"> <thead> <tr> <th>No.</th> <th>Name</th> <th>Job Description</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Imnayahayati Binti Mohd Ali</td> <td>General Worker</td> </tr> <tr> <td>2</td> <td>Roslan A/L Jimoi</td> <td>Pest &amp; Disease</td> </tr> <tr> <td>3</td> <td>Rosnah A/P Bera</td> <td>Gardener</td> </tr> <tr> <td>4</td> <td>Sazali Bin Seting</td> <td>Weeding</td> </tr> <tr> <td>5</td> <td>Rina Rahayu Lestari</td> <td>General Worker</td> </tr> <tr> <td>6</td> <td>Zaenal Arifin</td> <td>Loader</td> </tr> <tr> <td>7</td> <td>Dani Rahmat</td> <td>Harvester</td> </tr> <tr> <td>8</td> <td>Wahap</td> <td>Harvester</td> </tr> <tr> <td>9</td> <td>Darwin Sirait</td> <td>Weeding</td> </tr> </tbody> </table> <p>Viva Estate:</p> <table border="1" data-bbox="1050 1166 1733 1364"> <thead> <tr> <th>No.</th> <th>Name</th> <th>Job Description</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Riki Rahadi</td> <td>Harvester</td> </tr> <tr> <td>2</td> <td>Muhamad Irwan</td> <td>Harvester</td> </tr> <tr> <td>3</td> <td>Herman</td> <td>Weeding</td> </tr> </tbody> </table>	No.	Name	Job Description	1	Imnayahayati Binti Mohd Ali	General Worker	2	Roslan A/L Jimoi	Pest & Disease	3	Rosnah A/P Bera	Gardener	4	Sazali Bin Seting	Weeding	5	Rina Rahayu Lestari	General Worker	6	Zaenal Arifin	Loader	7	Dani Rahmat	Harvester	8	Wahap	Harvester	9	Darwin Sirait	Weeding	No.	Name	Job Description	1	Riki Rahadi	Harvester	2	Muhamad Irwan	Harvester	3	Herman	Weeding	
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<b>4.4.5.4</b>	<p>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.</p> <p><b>- Minor compliance -</b></p>	<p>Management has ensured employees of contractors are paid based on minimum wages order and according to the employment contract agreed between the contractor and his employee. Based on verification of sample work agreement, passport, work permit, detail payslip, checkroll &amp; attendance for Oct 2020, Dec 2020, Feb 2021 &amp; April 2021 for sample contractor workers documents as following:</p> <p>Rompin Estate Contractor (Koh Sing Huat):</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Name</th> <th>Job Description</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Liswati</td> <td>General Worker</td> </tr> </tbody> </table>	No.	Name	Job Description	1	Liswati	General Worker	Minor NC																								
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Criterion / Indicator	Assessment Findings			Compliance
	2	Afifudin	Harvester	
	3	Hartoni	Loader	
	Padang Estate:			
	No.	Name	Position	
	1	Heru (Nallian)	Harvester	
	2	Morad Hossen (Nallian)	Harvester	
	3	Arya Dana (Tyseng)	Kong	
	4	Abdul Manan (Zaharuddin)	Loose Fruits Collector	
	5	Mahrun (LKG)	Weed Sprayer	
	6	Ari Satriadi (LKG)	Manuring	
	7	Adi Wijaya (LKG)	Carpenter	
	<p>However, it was found that in Padang Estate:</p> <p>1) Employment contract was expired for Morad Hossen (Contractor: Nallian Enterprise) - Contract expired date: 15/4/2021</p> <p>2) Salary payment for a sample worker name: Morad Hossen (Contractor: Nallian Enterprise) for his work on rest day dated 4/10/2020, 11/10/2020 &amp; 18/10/2020 not paid/reflective in pay documents.</p> <p>This indicated that:</p>			

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Criterion / Indicator		Assessment Findings	Compliance
		<p>1) Work agreement (Employment Contract) for a sample contractor's employee shown employment period ended.</p> <p>2) Salary not paid according to work delivered for a sample contractor's employee</p> <p>Hence, a Minor NC has been raised on the matter.</p>	
<b>4.4.5.5</b>	<p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p><b>- Major compliance -</b></p>	<p>All estates established and provided accurate overview of all employees records as per sighted List of Foreign Worker 2021/2022 and Estate Local Workers register.</p>	Complied
<b>4.4.5.6</b>	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p><b>- Major compliance -</b></p>	<p>Based on sample records sighted in indicator 4.4.5.3 above, it was found that the work agreement (Employment Contract) for some sample employees shown employment period ended for following employees in Rompin Estate as following:</p> <p>1) Imnayahayati Binti Mohd Ali - Contract expired date: 31/12/2020</p> <p>2) Roslan A/L Jimoi - Contract expired date: 31/12/2020</p> <p>3) Rosnah A/P Bera - Contract expired date: 31/12/2020</p> <p>Hence, a Minor NC has been raised on the matter.</p>	Minor NC
<b>4.4.5.7</b>	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p> <p><b>- Major compliance -</b></p>	<p>Based on sample records sighted in indicator 4.4.5.3 above, it was found that the established time recording system for both employees and employers were transparently recorded the working hours and overtime.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
<b>4.4.5.8</b>	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.  <b>- Major compliance -</b>	Based on sample records sighted in indicator 4.4.5.3 above, it was found that the working hours and breaks of the individual worker indicated in the time records complied with labour regulations and collective agreements. Overtime also mutually agreed upon and met Malaysia Employment Act requirements.	Complied
<b>4.4.5.9</b>	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.  <b>- Major compliance -</b>	Based on sample records sighted in indicator 4.4.5.3 above, it was found that the wages and overtime payment documented on the pay slips in line with legal regulations and collective agreements.	Complied
<b>4.4.5.10</b>	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.  <b>- Minor compliance -</b>	Based on sample records sighted in indicator 4.4.5.3 above, it was found that the workers provided with other social benefits as per sample sighted as following:  - Annual Leave Payment for the Year 2020 – Rompin Estate; Dated 24/2/2021.  Monthly Social Security Services contribution for sampled Form 8A SOCSO Contribution Form on months of Oct 2020, Dec 2020, Feb 2021 & Apr 2021.	Complied
<b>4.4.5.11</b>	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.  <b>- Major compliance -</b>	All estates provided on-site living quarters that were habitable and have basic amenities and facilities as per authorities records as following:  - Rompin Estate: <i>Borang 2 Perakuan Kelayakan Peraturan-Peraturan Standard-Standard Minimum Perumahan dan Kemudahan Pekerja</i>	Minor NC

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Criterion / Indicator		Assessment Findings	Compliance
		<p>1990 (Peraturan 38(1)(a)); Approval # PHG.PKN.18/2018; Location: Pekan; Date 21/5/2019</p> <ul style="list-style-type: none"> <li>- Viva Estate: <i>Borang 2 Perakuan Kelayakan Peraturan-Peraturan Standard-Standard Minimum Perumahan dan Kemudahan Pekerja 1990 (Peraturan 38(1)(a));</i> Approval # K.8/2017; Location: Ladang Viva-Splendid, Daerah Mersing, Johor; Date 4/7/2018</li> <li>- Padang Estate: JTK letter ref. # Bil.(2)dImJTK/KG/7/06318; Date: 7/11/2019 and JTK letter ref. # Bil.(2)dIm.PLN/10103/2020/0026; Date: 20/10/2020</li> </ul> <p>However, for both Rompin Estate &amp; Padang Estate, no evidence that the supply of water for workers housing are according to Clause No. 6.(1)(a) and 6.(3) of Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) requirements.</p> <p>This indicated that the supply of water not fully in compliance with applicable requirements.</p> <p>Hence, a Minor NC has been raised on the matter.</p>	
<b>4.4.5.12</b>	<p>The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.</p> <p><b>- Major compliance -</b></p>	<p>All estates adopted the company's Human Rights and Social Policy dated 2/1/2019 that emphasized commitments towards providing workplace free from violence and sexual harassment to all employees. Additionally, a documented Guidelines for Addressing Sexual Harassment; MSPO-P4-C5; Version Control # 1.00; Date: 29/8/2018 was established as guidelines for employees in addressing sexual harassment.</p>	Complied
<b>4.4.5.13</b>	<p>The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in</p>	<p>No explicit documentations on the respect of rights of all employees to form and join trace union. However, there are workers representatives in all estates.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	<p>accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p><b>- Major compliance -</b></p>		
<b>4.4.5.14</b>	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not expose to hazardous working conditions.</p> <p><b>- Major compliance -</b></p>	<p>Seong Thye Plantations Sdn Bhd has the Social and Human Rights Policy, signed by Executive Chairman on 02.01.2019 which mention that management will prohibit employment by coercion. Children and young persons shall not be employed or exploited, the minimum age shall comply with local, state and national legislation Based on workers register, no child labour found in both sites.</p>	Complied
<b>Criterion 4.4.6: Training and competency</b>			
<b>4.4.6.1</b>	<p>All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.</p> <p><b>- Major compliance -</b></p>	<p>Sighted training procedure has been prepared refer MSPO-10 Rev 0 dated 01/07/2018. The management had planned, established, and documented trainings which were to be carried out internally throughout the year 2020 and 2021. The trainings were on Safety and on SOP such as harvesting, manuring, spraying, chemical handling, etc. Training records were available for verification. Sample of training below:</p> <p>Ladang Rompin</p>	Complied



Criterion / Indicator		Assessment Findings	Compliance
		1. PPE training dated 18/07/2020 2. SOP-Chemical Safety management dated 12/11/2020 3. Harvesting training dated 23/09/2020 Ladang Viva 1. Chemical Mixing SOP dated 26/02/2021 2. Harvesting Technique Training dated 16/04/2021 3. Manuring Training dated 16/04/2021 Ladang Padang 1. Buffer Zone Training dated 04/02/2021 2. Safety Diesel Training dated 25/06/2020	
<b>4.4.6.2</b>	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. <b>- Major compliance -</b>	Sighted training procedure refer MSPO-10 Rev: 0 dated 01/07/2018. Training need analysis for each worker has been established. From the training needs, they developed training program for the year 2021. Sighted Training Need Analysis dated 17/02/2021. Sighted Training Evaluation Form dated 17/02/2021.	Complied
<b>4.4.6.3</b>	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. <b>- Minor compliance -</b>	Training program has been made available to the audit team. Sighted the training listed as follow: 1. Policy Briefing 2. ERP & First Aid Training	Complied

Criterion / Indicator		Assessment Findings	Compliance
		3. PPE Training 4. Safety Signboard Training 5. Induction to new workers. 6. COVID-19 Awareness Training	
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>			
<b>Criterion 4.5.1: Environmental Management Plan</b>			
<b>4.5.1.1</b>	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.  <b>- Major compliance -</b>	Seong Thye Plantations Sdn Bhd has developed Environmental Policy on 02/01/2019, which was endorsed by their Executive Chairman, Mr. Goh Wei Lei. The company is committed to implement the good practices in line with their objective.  Environment policy was communicated thru a briefing conducted on: Ladang Rompin: 05/04/2021 by Mr Raja Saifudin Ladang Viva: 05/04/2021 by Mr Raja Saifudin Ladang Padang: 02/06/2021 by Mr Ihsan Sabri	Complied
<b>4.5.1.2</b>	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations.  <b>- Major compliance -</b>	Environmental management plan was made available to the audit team. The plan was prepared by Mr. Raja Mohd Saifuldin Bin Raja Mamat, dated on 25/03/2021 and approved by Mr. Oh Chiow Suan. The plan also covers the environmental policy and objectives. Some of the aspects and impacts analysis of the operations are as follows:  Ladang Rompin / Ladang Viva:	Complied

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		Clinic	Disposal of clinical waste	Land pollution	
		Weeding and Pest & Disease	Chemical residue washed into water sources	Land and water pollution	
		Diesel tank	Oil spillage from diesel tank	Containment bund around the diesel tank.	
<b>4.5.1.3</b>	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.  - <b>Major compliance</b> -	<p>The estate has implemented its environmental action plans, which was developed to mitigate negative impacts and improve positive impacts. The plans specify the responsible persons. Mitigation measures were derived from the Environmental Aspect Impact Assessment, dated 04/02/2021.</p> <p>The plans generally included the control and monitoring of:</p> <ol style="list-style-type: none"> <li>1. Estate Replanting</li> <li>2. Estate Operation</li> <li>3. Linesite workers</li> <li>4. Clinic</li> <li>5. Upkeep and Maintenance</li> <li>6. Harvesting</li> </ol>			Complied
<b>4.5.1.4</b>	A programme to promote the positive impacts should be	Programmes to promote positive impacts had been included in the continual improvement plan. Among the positive impacts identified			Complied

Criterion / Indicator		Assessment Findings	Compliance
	included in the continual improvement plan. <b>- Minor compliance -</b>	were EFB mulching, cover crop planting in hilly area and planting of beneficial plants.	
<b>4.5.1.5</b>	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. <b>- Major compliance -</b>	An awareness and training programme were conducted for making the workers understand the policy and objectives of the environmental management and improvement plans. Sample training below: Ladang Rompin: Latihan Penyemburan Racun Di Kawasan Riparian Zon dated 23/02/2021 Ladang Viva: Latihan Penyemburan Racun Di Kawasan Riparian Zon dated 23/02/2021 Ladang Padang: Latihan Penyemburan Racun Di Kawasan Riparian Zon dated 05/02/2021	Complied
<b>4.5.1.6</b>	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. <b>- Major compliance -</b>	Estate management has conducted regular meeting with their workers to discuss regarding on the environment issues. Sighted the meeting minute conducted in Ladang Padang as follows. The estate has conducted environmental meeting on 19/01/2021, chaired by Mr. Oh Chiow Suan and attended by 23 members. Meeting was attended by Ladang Rompin and Ladang Viva. For Ladang Padang, meeting has been conducted on 10/03/2021 with 18 participants. Among the agenda discuss during the meeting were: <ol style="list-style-type: none"> <li>1. Buffer zone</li> <li>2. Illegal hunting prohibition</li> <li>3. Zero burning policies</li> </ol>	Complied

Criterion / Indicator		Assessment Findings	Compliance																								
		4. Heavy vehicle 5. Chemical handling 6. Polybag and fertilizer bag management 7. Domestic waste																									
<b>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</b>																											
<b>4.5.2.1</b>	<p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.</p> <p><b>- Major compliance -</b></p>	<p>Sighted database of Diesel usage for Ladang Rompin, Ladang Viva and Ladang Padang. Baseline consumption of non-renewable energy (diesel) is derived actual consumption. The main consumption of diesel is for transportation of workers, fertilizers and agrochemicals using light vehicle.</p> <p>Diesel Usage – Ladang Rompin</p> <table border="1"> <thead> <tr> <th>2021</th> <th>Todate 2020</th> <th>Jan</th> <th>Feb</th> <th>Mar</th> <th>Apr</th> </tr> </thead> <tbody> <tr> <td>Baseline</td> <td>6.23</td> <td>4.18</td> <td>4.64</td> <td>2.65</td> <td>2.63</td> </tr> </tbody> </table> <p>Diesel Usage – Ladang Padang</p> <table border="1"> <thead> <tr> <th>2021</th> <th>Todate 2020</th> <th>Jan</th> <th>Feb</th> <th>Mar</th> <th>Apr</th> </tr> </thead> <tbody> <tr> <td>Baseline</td> <td>4.38</td> <td>1.06</td> <td>1.15</td> <td>1.34</td> <td>1.29</td> </tr> </tbody> </table>	2021	Todate 2020	Jan	Feb	Mar	Apr	Baseline	6.23	4.18	4.64	2.65	2.63	2021	Todate 2020	Jan	Feb	Mar	Apr	Baseline	4.38	1.06	1.15	1.34	1.29	Complied
2021	Todate 2020	Jan	Feb	Mar	Apr																						
Baseline	6.23	4.18	4.64	2.65	2.63																						
2021	Todate 2020	Jan	Feb	Mar	Apr																						
Baseline	4.38	1.06	1.15	1.34	1.29																						
<b>4.5.2.2</b>	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>The estate management has estimated the direct usage of non-renewable energy for their operation and can be sighted in their annual budget year 2021. Refer Appendix B1 Estimated Expenditure for Transport Vehicle. Sighted data Electricity Bill Fee For the month of April 2021 and May 2021. Sighted Water Bills for Ladang Viva for the month of March and April 2021.</p>	Complied																								

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Criterion / Indicator		Assessment Findings	Compliance															
4.5.2.3	The use of renewable energy should be applied where possible. - <b>Minor compliance</b> -	Solar system are used in the compound. Solar system is used to supply electricity to post guard.	Complied															
<b>Criterion 4.5.3: Waste management and disposal</b>																		
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - <b>Major compliance</b> -	The company has established MSPO Waste Management Procedure, reviewed on 30 <sup>th</sup> August 2018, version:1, revision:1. The procedure identify and characterize the two type of waste which are scheduled waste and domestic waste.  The management has identified and documented the waste generated by the estate and mill. Sighted Monitoring and Action Plan for Environmental aspects Impact for Ladang Rompin, Ladang Viva and Ladang Padang.	Complied															
4.5.3.2	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:  a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products  - <b>Major compliance</b> -	Environmental Aspect Impact Assessment was developed. Waste management plan has been prepared for Ladang Rompin and Ladang Viva dated 08/03/2021. They have identified the sources of waste and action taken to control and monitor the program.  <table border="1"> <thead> <tr> <th>Code</th> <th>Category</th> <th>Control Measure</th> <th>Action</th> <th>Monitoring Program</th> </tr> </thead> <tbody> <tr> <td>SW305</td> <td>Spent lubricating Oil</td> <td>Proper label, Spillage cleaned</td> <td>Record of waste generated</td> <td>AM, Staff and Foremen</td> </tr> <tr> <td>SW408</td> <td>Cleaning Spillage on the floor</td> <td>Stored in separate containers</td> <td>Foremen record</td> <td>Update in the E-</td> </tr> </tbody> </table>	Code	Category	Control Measure	Action	Monitoring Program	SW305	Spent lubricating Oil	Proper label, Spillage cleaned	Record of waste generated	AM, Staff and Foremen	SW408	Cleaning Spillage on the floor	Stored in separate containers	Foremen record	Update in the E-	Complied
Code	Category	Control Measure	Action	Monitoring Program														
SW305	Spent lubricating Oil	Proper label, Spillage cleaned	Record of waste generated	AM, Staff and Foremen														
SW408	Cleaning Spillage on the floor	Stored in separate containers	Foremen record	Update in the E-														

Criterion / Indicator		Assessment Findings					Compliance
						SWISS system	
		SW410	PPE workers	Collected old PPE	Record the collection	AM, Staff to update the record	
<b>4.5.3.3</b>	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>The company has established a Manual Keselamatan &amp; Kesihatan Pekerja: Bahagian Ladang – Prosedur Kerja Selamat Penggunaan Bahan Kimia/Racun. The procedure details out the procedure of handling used chemical, chemical issuance and exposure control and personnel protection.</p> <p>The disposal records were made available to the audit team during the assessment. Refer E-Swiss Inventory record:</p> <p>Ladang Rompin: File ref: AS:CR31/152/000/002 dated 31/05/2021</p> <p>Ladang Padang: File ref: AS(B)J31/152/000/027 dated 30/05/2021</p>					Complied
<b>4.5.3.4</b>	<p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p><b>- Major compliance -</b></p>	<p>Ladang Rompin</p> <p>The company has established a Safe Working Procedure: Chemical Usage, Manual Keselamatan &amp; Kesihatan Pekerjaan Bahagian Ladang, section 13 (Pelupusan Bahan Terjadual). Based on interview, all empty chemical containers were punctured and disposed at designated place.</p> <p>Ladang Viva</p> <p>Based on interview, Ladang Viva did not produce any chemical waste since all the chemical and premix activity was conducted by the contractor at his own place. After completing the spraying activity, the contractor will take back all equipment and keep at his own store.</p>					Complied



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Criterion / Indicator		Assessment Findings	Compliance
		Ladang Padang Based on interview, Empty pesticide containers were disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The containers were punctured before stored at designated store.	
<b>4.5.3.5</b>	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. <b>- Minor compliance -</b>	Verified that domestic waste has been disposed at the landfill of estate. The landfill was located 3km from residential area and watercourse. Sighted record of rubbish collection from Ladang Rompin, Ladang Viva and Ladang Padang. Refer domestic waste collection record as at May 2021.	Complied
<b>Criterion 4.5.4:</b> Reduction of pollution and emission			
<b>4.5.4.1</b>	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. <b>- Major compliance -</b>	Sighted Environmental Aspects Impact Assessment for Ladang Rompin, Ladang Viva and Ladang Padang. The assessment consists of operation, environmental aspects, environmental impact, analysis of negative impact, mitigation measure and monitoring program. Verified 20 list of activities were discussed in the EAI. Ladang Rompin and Ladang Viva was reviewed the EAI on 04/02/2021 prepared by Mr Raja Saifuldin and approved by Mr Oh Chiow Suan.	Complied
<b>4.5.4.2</b>	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. <b>- Major compliance -</b>	Estate has an action plan to reduce significant pollutants and emission in daily operation. Refer Section Mitigation Measure and Monitoring programme in EAI dated 04/02/2021.	Complied
<b>Criterion 4.5.5:</b> Natural water resources			

Criterion / Indicator	Assessment Findings	Compliance
<p><b>4.5.5.1</b> 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:</p> <ul style="list-style-type: none"> <li>a. Assessment of water usage and sources of supply.</li> <li>b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities.</li> <li>c. 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.).</li> <li>d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</li> <li>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</li> <li>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</li> </ul> <p><b>- Major compliance -</b></p>	<p>Water management plan was sighted and reviewed during the document checking at Ladang Rompin, Ladang Viva and Ladang Padang.</p> <ul style="list-style-type: none"> <li>a. Water consumption record for daily used has been sighted and reviewed. The source of water from water catchment and treated by the estate. Inspection and analysis were conducted by the management as per stated in the water management plan.</li> <li>b. Estate conducted the water sampling activities and sent the samples to the external laboratory. Refer latest water sampling report on 28/04/2021 by ECOLAB. Refer Sample Number SW227601, 9888/21 for Drinking water analysis and Treated water analysis.</li> <li>c. Based on interview, Part of the action to reduce water wastage is by educating the workers. Workers shows a fair understanding regarding on the water saving concept. Besides, the estate management practices reused of water from triple rinsed or spillage during premix activity for spraying operation.</li> <li>d. Buffer zone was available along the water course. The estate has taken a good maintenance of the buffer zone. Refer training on spraying and manuring activities has been conducted for workers to create awareness. Based on photo, verified proper signage has been installed at the buffer zone area. There is no activity conducted at buffer zone area. Verified through photo evidence dated 31/05/2021. There is no natural waterways at the Ladang Viva.</li> </ul>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		<p>e. Not applicable since no vegetation has been removed from the buffer zone. Verified through photo evidence dated 31/05/2021.</p> <p>f. Not applicable.</p>	
<b>4.5.5.2</b>	<p>No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p><b>- Minor compliance -</b></p>	<p>Verified that there is no construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p>	Complied
<b>4.5.5.3</b>	<p>Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles).</p> <p><b>- Minor compliance -</b></p>	<p>Based on interview, verified that water harvesting practice has been practiced for installing drain in the field.</p>	Complied
<b>Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value</b>			
<b>4.5.6.1</b>	<p>Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:</p> <p>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</p> <p>b) Conservation status (<i>e.g.</i> 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),</p>	<p>The estate management had identified and collated information of high biodiversity value (HBV) ecosystems and on rare, threatened, or endangered (RTE) species guided by MSPO Procedure (MSPO-P5-C6 – Guidance on Biodiversity &amp; Hunting) dated 30/08/2019.</p> <p>The estate has obtained list of Totally Protected Species (Mammals) under Wildlife Conservation Act, 2010 from the Department of Wildlife and National Parks (DWNP) (PERHILITAN). No RTE species recorded at the estate.</p> <p>Sighted Identification of High Biodiversity Value (HBV) Habitat Area dated 02/01/2021 prepared by Mr Raja Saifuldin and approved By Mr Oh Chiow Suan.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	<p>that could be significantly affected by the grower(s) activities.</p> <p><b>- Major compliance -</b></p>	<p>For Ladang Padang, sighted High Biodiversity Value (HBV) Habitat Area dated 16/03/2021 prepared by Environmental Officer and approved By Mr Tay Tong Yeak.</p>	
<b>4.5.6.2</b>	<p>If rare, threatened or endangered species or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>a) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p><b>- Major compliance -</b></p>	<p>Verified there is no Endangered Species / Wildlife recorded for Quarter 1, 2021. Refer HBV Monitoring Sheet 2021. The monitoring sheet consists of 3 main evaluation which is:</p> <ol style="list-style-type: none"> <li>1. Endangered species / Wildlife</li> <li>2. Ecosystem</li> <li>3. Sites of Global or National, Cultural, Archaeological, or Historically Significant.</li> </ol> <p>Even though no RTE species was sighted and recorded in the estate, the estate discouraging any illegal hunting and ensuring any legal requirement relating to the protection of the species are met.</p> <p>Interview with the management and workers confirmed that they can demonstrate a fair understanding regarding on the illegal hunting activities.</p>	Complied
<b>4.5.6.3</b>	<p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p><b>- Major compliance -</b></p>	<p>Sighted Biodiversity Management Plan 2021 has been prepared on 02/01/2021. Monitoring and implementation is ongoing even though no RTE species found in the estate compound.</p>	Complied
<b>Criterion 4.5.7: Zero burning practices</b>			

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4.5.7.1	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 -	Seong Thye Plantations Sdn Bhd had a Zero Burning Policy addressed in their Environmental Policy dated 02/01/2019 and signed by the Executive Chairman Mr Goh Wei Lei.	Complied
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop.  - Major compliance -	Not applicable since there is no application to use of fire for waste disposal and for preparing land for oil palm cultivation or replanting.	Complied
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws.  - Major compliance -	Not applicable since there is no application to use of fire for waste disposal and for preparing land for oil palm cultivation or replanting.	Complied
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.  - Minor compliance -	Verified through interview, replanting conducted as procedure, which is felling, chipping, and stacking. The cover crop used was Legume Crop Cover.	Complied
<b>4.6 Principle 6: Best Practices</b>			
<b>Criterion 4.6.1: Site Management</b>			

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4.6.1.1	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> <p><b>- Major compliance -</b></p>	<p>Seong Thye Plantations Sdn Bhd had established and documented Standard operating procedures. It was addressed in manual "Guidelines on Good Agriculture Practices" dated 01/01/2019. Topics covered in the manual were chapters:</p> <ol style="list-style-type: none"> <li>1. Introduction to good agriculture practices</li> <li>2. Replanting</li> <li>3. Manuring</li> <li>4. Harvesting</li> <li>5. P &amp; D</li> <li>6. Others – establishment and management of riparian zone</li> </ol> <p>The procedures were monitored by program sheets, harvesting round records, production records, stock sheets and monthly progress reports. Verified through interview with person in charge found all operation were followed their SOP and Agricultural Manual.</p>	Complied
4.6.1.2	<p>Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.</p> <p><b>- Major compliance -</b></p>	<p>The management for areas where oil palm was grown within permitted levels on sloping land, had established and documented. Appropriate soil conservation measures to be implemented to prevent both soil erosion as well as siltation of drains and waterways was addressed under Chapter B – Replanting in the manual "Guidelines on Good Agriculture Practices" dated 01/01/2019.</p> <p>It was mainly addressed under the topic "Terrace and Platform Construction, Road Construction and Drainage. Verified through interview found that the Estates also practiced ground cover management, that is, maintenance of the fern <i>Nephrolepis Biserrata</i> and soft grasses in the interline, biomass recycling and planting of <i>Mucuna Bracteata</i>.</p>	Complied

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<b>4.6.1.3</b>	A visual identification or reference system shall be established for each field. <b>- Major compliance -</b>	The Estates had for visual identification/reference system documented in field Maps. On the ground the field blocks were identified/marked using concrete slabs with the following information - Block No., Year Planted & Ha.	Complied																								
<b>Criterion 4.6.2: Economic and financial viability plan</b>																											
<b>4.6.2.1</b>	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. <b>- Major compliance -</b>	The company has developed 10 years business plan which include production, expenditure, and profit & loss projection for year 2021 – 2030.	Complied																								
<b>4.6.2.2</b>	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. <b>- Major compliance -</b>	Replanting program is prograded and established. Refer 5 years Replanting Schedule (FY2021 to FY2025) <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Replating, Ha</th> <th>Rompin Est.</th> <th>Viva Est.</th> <th>Padang Est.</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>266.00</td> <td>-</td> <td>-</td> </tr> <tr> <td>2022</td> <td>267.00</td> <td>-</td> <td>-</td> </tr> <tr> <td>2023</td> <td>271.00</td> <td>-</td> <td>287.50</td> </tr> <tr> <td>2024</td> <td>307.00</td> <td>-</td> <td>233.00</td> </tr> <tr> <td>2025</td> <td>298.00</td> <td>-</td> <td>313.25</td> </tr> </tbody> </table>	Replating, Ha	Rompin Est.	Viva Est.	Padang Est.	2021	266.00	-	-	2022	267.00	-	-	2023	271.00	-	287.50	2024	307.00	-	233.00	2025	298.00	-	313.25	Complied
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<b>4.6.2.3</b>	The business or management plan may contain: a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production : cost per tonne of FFB	Documented Business plan/budget were available for 2021 and projections until 2030. Attention was given to crop projection, cost of production, cost per ton and per hectare. The cost of production was reviewed and compared against expenditure each year with projections in place for future years. Refer FY 2021 Proposed Capital	Complied																								

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	d) Price forecast e) e) Financial indicators : cost benefit, discounted cash flow, return on investment <b>- Major compliance -</b>	Expenditure (CAPEX) Ladang Rompin, Ladang Viva and Ladang Padang.	
<b>4.6.2.4</b>	The management plan shall be effectively implemented, and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. <b>- Major compliance -</b>	Implementation of the management plan was regularly monitored via Monthly Progress and Production Reports, the computerized system, OPMN006, monthly meetings and visits by COO & other HQ visiting executive and by internal and external audits. The business plan was reviewed by management team at least annually.	Complied
<b>Criterion 4.6.3: Transparent and fair price dealing</b>			
<b>4.6.3.1</b>	Pricing mechanisms for the products and other services shall be documented and effectively implemented. <b>- Major compliance -</b>	Pricing mechanism for all estates FFB products were based on MPOB prices. Sighted sample provided for latest FFB prices dated 3/5/2021.	Complied
<b>4.6.3.2</b>	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. <b>- Major compliance -</b>	Contracts are fair, legal and transparent as per sample sighted for field work agreement between Viva Estate and Fatt Kee Biotechnologies dated 1/2/2021. Payment are made timely as per sample sighted for April 2021 invoice # 1793 paid on 7/5/2021.	Complied
<b>Criterion 4.6.4: Contractor</b>			
<b>4.6.4.1</b>	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information.	Documentation and information established as Control Points for Contractor; Doc. # MSPO-11; Date; 11/9/2018 were provided to contractors through contract agreements for sample contractor as following:	Complied



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	- <b>Major compliance</b> -	- Koh Sing Huat; FFB Transport Agreement dated 1/1/2021 - Fatt Kee Biotechnologies; Field Work Agreement dated 1/1/2021	
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - <b>Major compliance</b> -	Evidence of agreed contract agreements provided for sample contractor as following: - Koh Sing Huat; FFB Transport Agreement dated 1/1/2021 - Fatt Kee Biotechnologies; Field Work Agreement dated 1/1/2021	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - <b>Minor compliance</b> -	All estates has included the requirement for the contractor to allow the company and its assigned third parties to interview members of the workforce and inspect the contractor’s premises, for assurance of compliance with the company’s requirements, including the MSPO standards in the contractor agreement sighted as per indicator 4.6.4.2 above.	Complied
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. - <b>Major compliance</b> -	The management verified all relevant records related to contractors’ work including daily reports, monthly reports and invoices etc. applicable to task performed by contractor through checking and signing.	Complied
<b>4.7 Principle 7: Development of new planting</b>			
<b>Criterion 4.7.1: High biodiversity value</b>			
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.	There is no development of new planting at estates.	Not Applicable

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	- 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.  - Major compliance -	There is no development of new planting at estates.	Not Applicable
<b>Criterion 4.7.2: Peat Land</b>			
4.7.2.1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice.  - Major compliance -	There is no development of new planting at estates.	Not Applicable
<b>Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)</b>			
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations.  - Major compliance -	There is no development of new planting at estates.	Not Applicable
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state	There is no development of new planting at estates.	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
	regulations, via participatory methodology which includes external stakeholders. <b>- Major compliance -</b>		
<b>4.7.3.3</b>	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. <b>- Major compliance -</b>	There is no development of new planting at estates.	Not Applicable
<b>4.7.3.4</b>	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. <b>- Minor compliance -</b>	There is no development of new planting at estates.	Not Applicable
<b>Criterion 4.7.4: Soil and topographic information</b>			
<b>4.7.4.1</b>	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. <b>- Major compliance -</b>	There is no development of new planting at estates.	Not Applicable
<b>4.7.4.2</b>	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. <b>- Major compliance -</b>	There is no development of new planting at estates.	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 4.7.5:</b> Planting on steep terrain, marginal and fragile soils			
<b>4.7.5.1</b>	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. <b>- Major compliance -</b>	There is no development of new planting at estates.	Not Applicable
<b>4.7.5.2</b>	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. <b>- Major compliance -</b>	There is no development of new planting at estates.	Not Applicable
<b>4.7.5.3</b>	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. <b>- Major compliance -</b>	There is no development of new planting at estates.	Not Applicable
<b>Criterion 4.7.6:</b> Customary land			
<b>4.7.6.1</b>	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. <b>- Major compliance -</b>	There is no development of new planting at estates.	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. <b>- Minor compliance -</b>	There is no development of new planting at estates.	Not Applicable
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. <b>- Major compliance -</b>	There is no development of new planting at estates.	Not Applicable
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. <b>- Major compliance -</b>	There is no development of new planting at estates.	Not Applicable
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. <b>- Major compliance -</b>	There is no development of new planting at estates.	Not Applicable
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. <b>- Major compliance -</b>	There is no development of new planting at estates.	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
<b>4.7.6.7</b>	The process and outcome of any compensation claims shall be documented and made publicly available. <b>- Major compliance -</b>	There is no development of new planting at estates.	Not Applicable
<b>4.7.6.8</b>	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. <b>- Minor compliance -</b>	There is no development of new planting at estates.	Not Applicable

**Appendix B: List of Stakeholders Contacted**

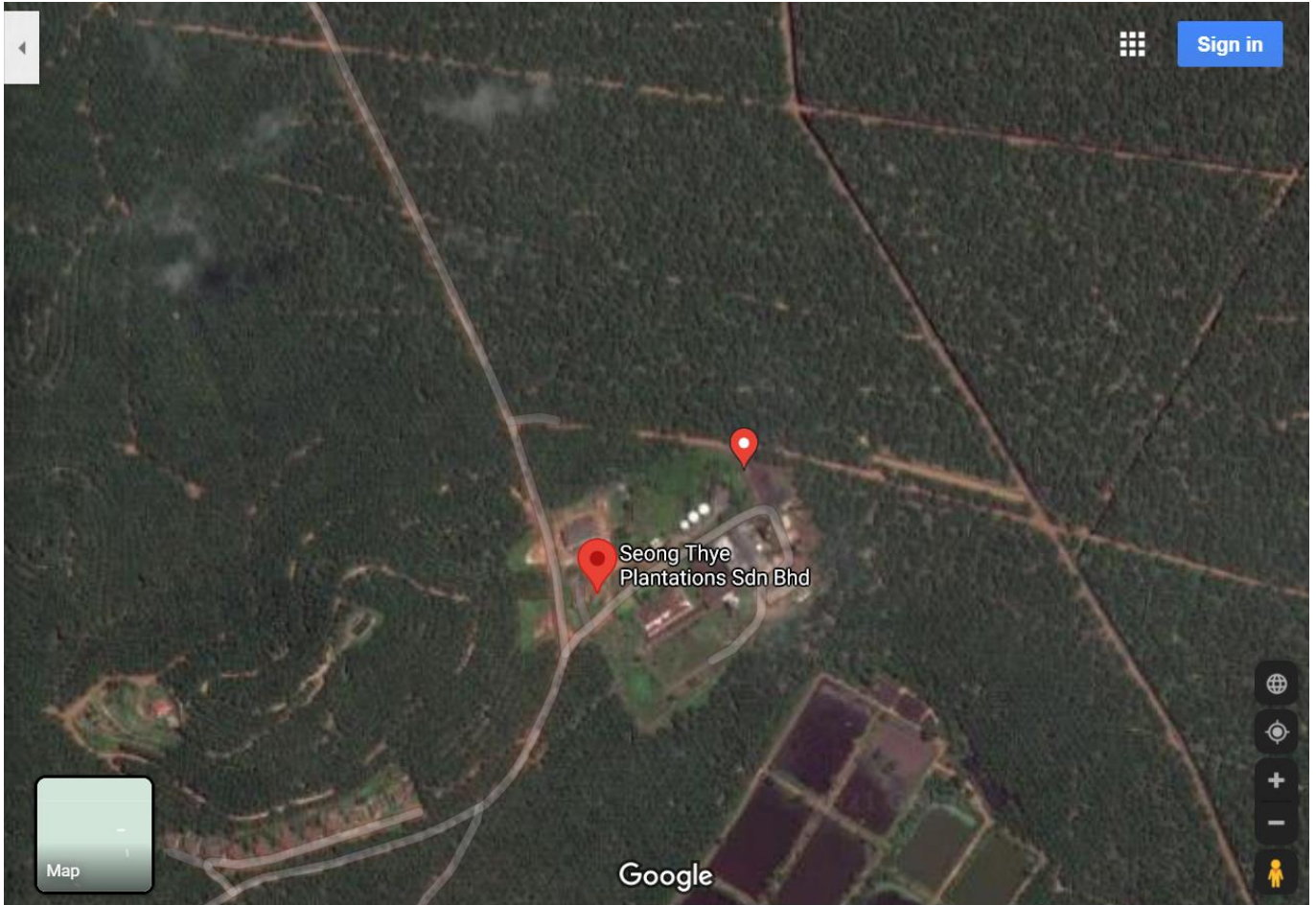
<b>Government Officer:</b> Unit Senjata IPD Kluang	<b>Community/neighbouring village:</b> -
<b>Suppliers/Contractors/Vendors:</b> -	<b>Worker’s Representative/Gender Committee:</b> Gender Committee Representatives Local and foreign workers

**Appendix C: Smallholder Member Details**

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

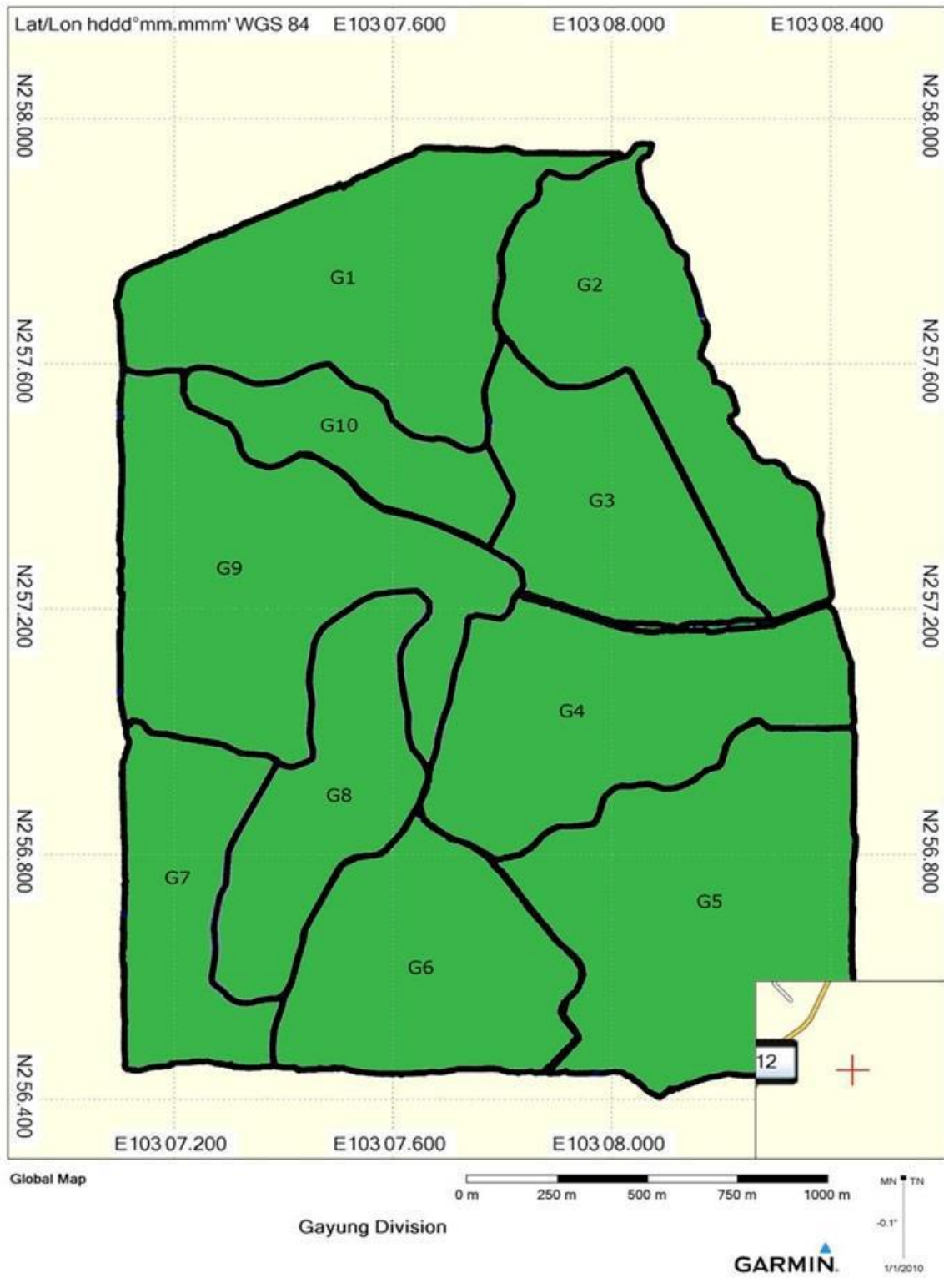
**Appendix D: Location and Field Map**

**Ladang Rompin POM and Estate**

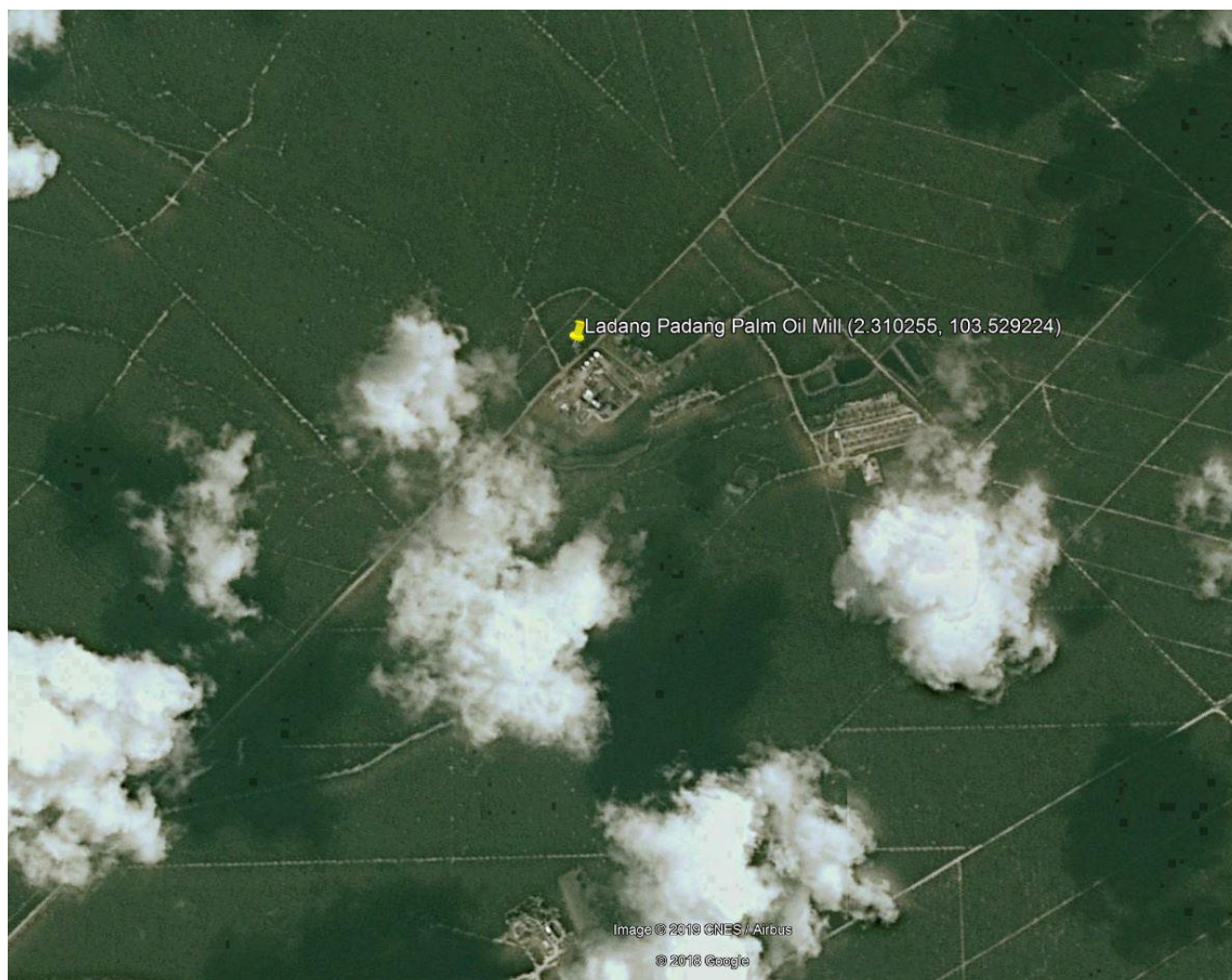




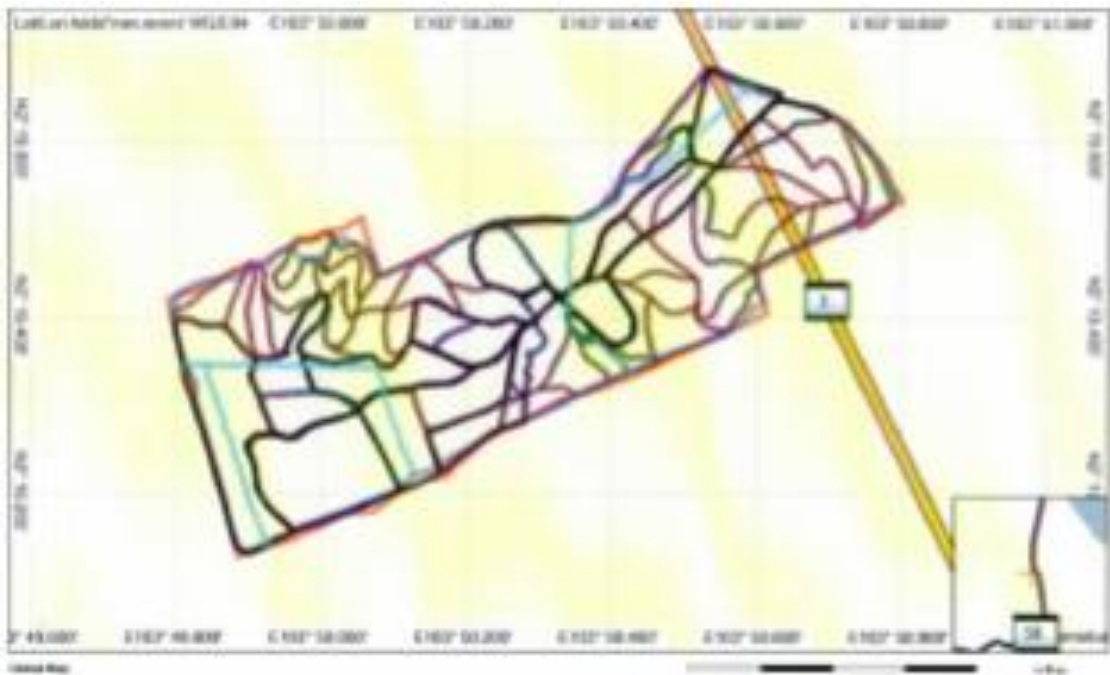
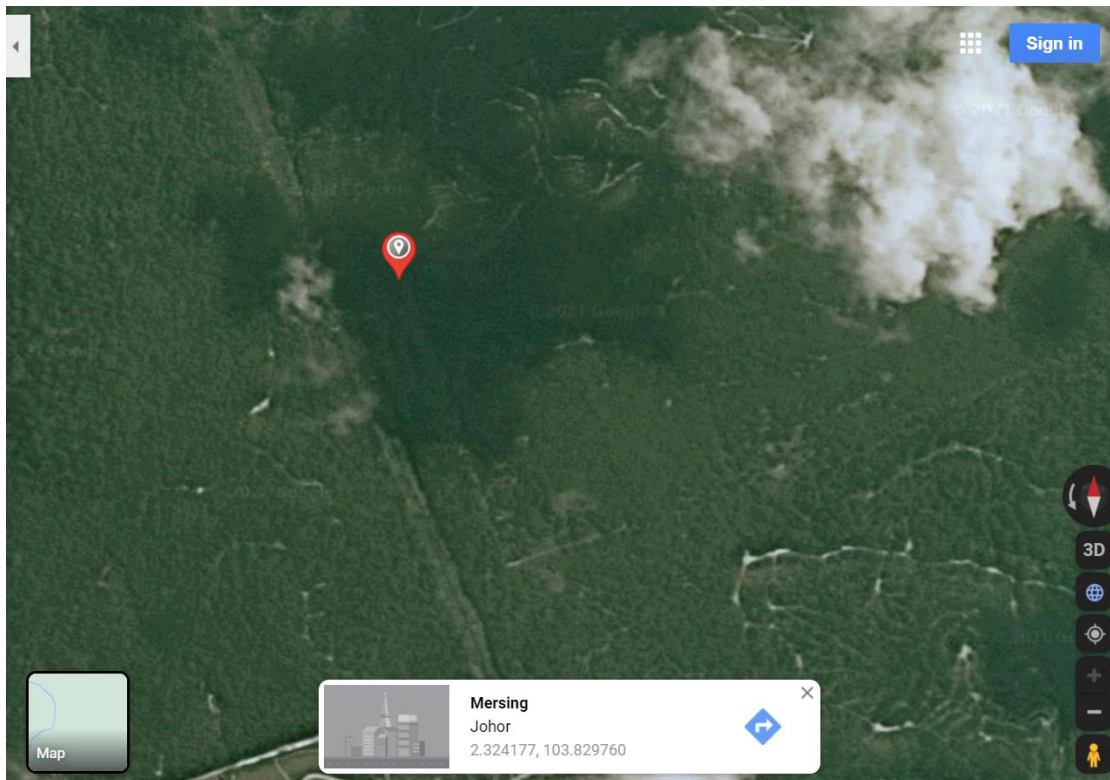
**Gayung Division (Ladang Rompin)**



**Ladang Padang POM and Estate**



**Ladang Viva**



**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