

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

CHIN TECK PLANTATIONS BERHAD

Client company Address:

Suite 2B-3A-2, Block 2B, Level 3A
Plaza Sentral, Jalan Stesen Sentral 5
Kuala Lumpur Sentral, 50470 Kuala Lumpur, Malaysia

Certification Unit:

Keratong Estate POM, Gua Musang Estate POM and Plantations
(Keratong Estate, Gua Musang Estate and Jemima & Sg. Sendayan Estates)

Location of Certification Unit:

- 1) Keratong Estate POM & Estate, Keratong Estate, Lot 311, 25400, 25399, Mukim Keratong, Daerah Rompin, Pahang, Malaysia
- 2) Gua Musang Estate POM & Estate, Lot 154, Mukim Ketil, Gua Musang, Kelantan, Malaysia
- 3) Jemima & Sg. Sendayan Estates, 71010 Lukut, Port Dickson, Negeri Sembilan, Malaysia

Report prepared by:

Valence Shem (Lead Auditor)

Report Number: SMO 3293237

Assessment Conducted by:

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

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Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
Company Name	Chin Teck Plantations Berhad		
Mill/Estate	MPOB License No.	Expiry Date	
	Gua Musang Estate POM:	500017604000	31/03/2022
	Gua Musang Estate:	501492402000	31/03/2022
	Keratong Estate POM:	500067204000	30/11/2021
	Keratong Estate:	501575102000	30/09/2021
	Jemima & Sg. Sendayan Estates:	501233602000	31/03/2022
Address	Suite 2B-3A-2, Block 2B, Level 3A, Plaza Sentral, Jalan Stesen Sentral 5, Kuala Lumpur Sentral, 50470 Kuala Lumpur, Malaysia		
Certification Unit	Keratong Estate POM, Gua Musang Estate POM and Plantations (Keratong Estate, Gua Musang Estate and Jemima & Sg. Sendayan Estates)		
Contact Person Name	Ng Yeen Chern and Pua Siew Onn		
Website	www.chinteck.com.my	E-mail	sopua@sinthye.com
Telephone	03-2261 4633	Facsimile	03-2261 4733

1.2 Certification Information			
Certificate Number	Mills: MSPO 712203 Estates: MSPO 712205		
Issue Date	26/06/2019	Expiry date	25/06/2024
Scope of Certification	Mills: Production of Sustainable Palm Oil and Palm Oil Products Estates: Production of Sustainable Oil Palm Fruits		
Standard	Mills: MS 2530-4:2013 General Principles for Palm Oil Mills Estates: MS 2530-3:2013 General Principles for Oil Palm Plantations and Organized Smallholders		
Stage 1 Date	07-10/05/2019		
Stage 2 / Initial Assessment Visit Date (IAV)	27-31/05/2019		
Continuous Assessment Visit Date (CAV) 1	15-20/06/2020		
Continuous Assessment Visit Date (CAV) 2	07, 08, 11, 28 and 29/06/2021 (Remote Audit)		
Continuous Assessment Visit Date (CAV) 3	-		
Continuous Assessment Visit Date (CAV) 4	-		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date

MSP0 720130	MSP0 SCCS	BSI Services Malaysia Sdn. Bhd.	10/11/2024
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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
Gua Musang Estate POM	Lot 154, Mukim Ketil, Gua Musang, Kelantan, Malaysia	4.83687	102.00415
Gua Musang Estate	Lot 154, Mukim Ketil, Gua Musang, Kelantan, Malaysia	4.83687	102.00415
Keratong Estate POM	Keratong Estate, Lot 311, 25400, 25399, Mukim Keratong, Daerah Rompin, Pahang, Malaysia	3.29491	102.82253
Keratong Estate	Keratong Estate, Lot 311, 25400, 25399, Mukim Keratong, Daerah Rompin, Pahang, Malaysia	3.29491	102.82253
Jemima & Sg. Sendayan Estates	Ladang Jemima & Sg. Sendayan, 71010 Lukut, Port Dickson, Negeri Sembilan, Malaysia	2.60995	101.85679

1.4 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Gua Musang Estate	¹ 1,438.62	0	¹ 179.78	1,618.40	88.89
Keratong Estate	7,959.55	0	132.00	8,091.55	98.37
Jemima & Sg. Sendayan Estates	1,559.35	0	59.11	1,618.46	96.35
TOTAL	10,957.52	0	370.89	11,328.41	96.73

Note:
¹Variance of 7.40 Ha compared to previous year due to resurveying of planted area after replanting.

1.5 Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Gua Musang Estate	171.50	456.00	-	811.12	-	1,267.12	171.50
Keratong Estate	827.72	1,838.61	3,623.12	-	1,670.10	7,131.83	827.72
Jemima & Sg. Sendayan Estates	-	187.41	1,029.26	342.68	-	1,559.35	-

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Total (ha)	999.22	2,482.02	4,652.38	1,153.80	1,670.10	9,958.30	999.22
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1.6 Certified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Jun 2020 - May 2021)	Actual (Jun 2020 - May 2021)	Forecast (Jun 2021 - May 2022)
¹ Gua Musang Estate	24,301.00	22,664.57	22,000.00
¹ Smallholder	-	227.73	700.00
¹ External Estate	-	5,588.12	21,300.00
² Keratong Estate	146,600.00	148,556.51	143,700.00
² External Estate	-	6,900.87	6,000.00
Jemima & Sg. Sendayan Estates	40,800.00	39,285.80	38,000.00
Total	211,701.00	223,223.60	231,700.00
Note: ¹ Crop sent to Gua Musang Estate POM ² Crop sent to Keratong Estate POM			

1.7 Uncertified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Jun 2020 - May 2021)	Actual (Jun 2020 - May 2021)	Forecast (Jun 2021 - May 2022)
¹ Small holder	-	610.24	100.00
¹ External Estate/FFB Dealer	14,400.00	22,795.01	7,000.00
Total	14,400.00	23,405.25	7,100.00
Note: ¹ Crop sent to Gua Musang Estate POM			

1.8 Certified Tonnage			
Mills	Estimated (Jun 2020 - May 2021)	Actual (Jun 2020 - May 2021)	Forecast (Jun 2021 - May 2022)
Gua Musang Estate POM	FFB	FFB	FFB
	24,301.00	28,480.42	44,000.00
Mill Capacity: 20 MT/hr	CPO (OER: 19.25%)	CPO (OER: 19.54%)	CPO (OER: 19.32%)
	4,677.94	5,564.91	8,500.00
	PK (KER: 4.75%)	PK (KER: 5.02%)	PK (KER: 5.00%)

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SCC Model: MB	1,154.30	1,429.61	2,200.00
Keratong Estate POM	FFB	FFB	FFB
	146,600.00	155,457.38	149,700.00
Mill Capacity: 50 MT/hr	CPO (OER: 19.00%)	CPO (OER: 19.10%)	CPO (OER: 19.00%)
	27,854.00	29,692.41	28,443.00
SCC Model: MB	PK (KER: 5.00%)	PK (KER: 4.80%)	PK (KER: 5.00%)
	7,330.00	7,464.63	7,485.00

1.9 Actual CPO Sold Volume (mt) (Jun 2020 - May 2021)					
CPO	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
5,564.91Mt (Gua Musang Estate POM)	0	0	0	5,564.91	5,564.91
29,692.41Mt (Keratong Estate POM)	0	0	0	28,970.00	28,970.00

1.10 Actual PK Sold Volume (mt) (Jun 2020 - May 2021)					
PK	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
1,429.61Mt (Gua Musang Estate POM)	0	0	0	1,429.61	1,429.61
7,464.63Mt (Keratong Estate POM)	0	0	0	7,320.00	7,320.00

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 180 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 assessment was remotely conducted from 07, 08, 11, 28 and 29/06/2021 due to the Movement Control Order (MCO) imposed by the Malaysian Government. Among the ICT plan used were MS Teams, WhatsApp, Share-drive and email. The audit programme is included in Section 2.3. The approach to the audit was to treat the Keratong Estate POM, Gua Musang Estate POM and Plantations (Keratong Estate, Gua Musang Estate and Jemima & Sg. Sendayan Estates) as an 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 planned audit objectives have been achieved, there were no connectivity issues which adversely affected the audit.

The methodology for collection of objective evidence included 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 smallholders 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 defers 1, 1.5 and 2 depending on risk), where n is total number of group members. The sampled smallholder listed in Appendix C.

Remote 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 privately using ICT. Separate interviews were made to external stakeholders such as contractors/suppliers and villages via phone calls. 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 are detailed in Section 3.2.

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

Assessment Program					
Name (Mill / Plantation / Group smallholders)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Gua Musang Estate POM	X	X	X	X	X
Gua Musang Estate	X	X	X	X	X
Keratong Estate POM	X	X	X	X	X
Keratong Estate (Div. A)	X		X		X
Keratong Estate (Div. B)		X		X	
Jemima & Sg. Sendayan Estates	X	X	X	X	X

Tentative Date of Next Visit: June 6, 2022 - June 11, 2022

Total No. of Mandays: 10

2.1 BSI Assessment Team

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Valence Shem (VSH)	Team Leader	He holds Bachelor Degree in Industrial Technology, graduated from University of Science Malaysia in 1998 and has 9 years working experience in oil palm plantation industry. He has been in the management system auditing line since 2009 for various standards such as ISO 14001, RSPO P&C, RSPO SCCS and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. Able to communicate in Bahasa Malaysia and English.
Mohamad Fitri Mustafa (MFU) [7, 8 & 11/06/2021]	Team Member	Graduate in degree of agribusiness with more than 8 years working experience in various plantation company and skills in Good Agricultural Practices (GAP) including Integrated Pest Management (IPM). Involved in ISCC and MSPO auditing since September 2017. Qualified as Lead Auditor/Auditor for MSPO, RSPO and ISO 9001. Completed and certified MSPO Auditor course in 2018 held by SGS (M)

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		Sdn Bhd. During this assessment, he assessed on the aspects of Occupation Health Safety requirement, HIRARC, Environment responsibility, training, Legal Requirements, land & Legal issue, natural and biodiversity conservation, Waste management, GHG, HCV, environment impact assessment and management plan, and Best Practice at Mill and Estates. Fluent in Bahasa Malaysia and English languages.
Nor Halis Abu Zar (NHA) [28-29/06/2021]	Team Member	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, MSPO 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 Occupation Health Safety requirement, HIRARC, Environment responsibility, training, Legal Requirements, land & Legal issue, natural and biodiversity conservation, Waste management, GHG, HCV, environment impact assessment and management plan, and Best Practice at Mill and Estates. Fluent in English and Bahasa.

2.2 Accompanying Persons

No.	Name	Role
	Nil	

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2.3 Assessment Plan

The assessment plan was sent to the client prior to the assessment.

Date & Venue	Time	Subjects	VSH (Room 1)	MFU/NHA (Room 2)	ICT Planned
Monday 07/06/2021 Gua Musang Estate POM	0900-0930	Opening meeting <ul style="list-style-type: none"> Opening presentation by audit team leader Confirmation of assessment scope and finalize audit plan 	✓	✓	Microsoft Team, WhatsApp, email, google drive, etc.
	0930-1030	Assessment and documentation review on mill best practice, legal requirements, OHS, environment, continual improvement, social aspects, legal requirements, employees' welfare and stakeholder management & consultation	✓	✓	
	1030-1040	10-minute break			
	1040-1230	Continue with the assessment and documentation review	✓	✓	
	1230-1330	Lunch break			
	1330-1450	Continue with the assessment and documentation review	✓	✓	
	1450-1500	10-minute break			
	1500-1630	Continue with the assessment and documentation review	✓	✓	
	1630-1700	Interim closing briefing	✓	✓	
Tuesday 08/06/2021 Gua Musang Estate	0900-1030	Assessment and documentation review on good agriculture practices, legal requirements, OHS, environment, continual improvement, social aspects, legal requirements, employees' welfare and stakeholder management & consultation	✓	✓	Microsoft Team, WhatsApp, email, google drive, etc.
	1030-1040	10-minute break			
	1040-1230	Continue with the assessment and documentation review	✓	✓	
	1230-1330	Lunch break			
	1330-1450	Continue with the assessment and documentation review	✓	✓	
	1450-1500	10-minute break			
	1500-1630	Continue with the assessment and documentation review	✓	✓	
	1630-1700	Interim closing briefing	✓	✓	

Date & Venue	Time	Subjects	VSH (Room 1)	MFU/NHA (Room 2)	ICT Planned
Friday, 11/06/2021 Jemima & Sg. Sendayan Estates	0900-1030	Assessment and documentation review on good agriculture practices, legal requirements, OHS, environment, continual improvement, social aspects, legal requirements, employees' welfare and stakeholder management & consultation	✓	✓	Microsoft Team, WhatsApp, email, google drive, etc.
	1030-1040	10-minute break			
	1040-1200	Continue with the assessment and documentation review	✓	✓	
	1200-1430	Lunch break & Friday prayer			
	1430-1630	Continue with the assessment and documentation review	✓	✓	
	1630-1700	Interim closing briefing	✓	✓	
Monday 28/06/2021 Keratong Estate POM	0900-1030	Assessment and documentation review on mill best practice, legal requirements, OHS, environment, continual improvement, social aspects, legal requirements, employees' welfare and stakeholder management & consultation	✓	✓	Microsoft Team, WhatsApp, email, google drive, etc.
	1030-1040	10-minute break			
	1040-1230	Continue with the assessment and documentation review	✓	✓	
	1230-1330	Lunch break			
	1330-1450	Continue with the assessment and documentation review	✓	✓	
	1450-1500	10-minute break			
	1500-1630	Continue with the assessment and documentation review	✓	✓	
	1630-1700	Interim closing briefing	✓	✓	
Tuesday 29/06/2021 Keratong Estate	0900-1030	Assessment and documentation review on good agriculture practices, legal requirements, OHS, environment, continual improvement, social aspects, legal requirements, employees' welfare and stakeholder management & consultation	✓	✓	Microsoft Team, WhatsApp, email, google drive, etc.
	1030-1040	10-minute break			
	1040-1230	Continue with the assessment and documentation review	✓	✓	
	1230-1330	Lunch break			
	1330-1450	Continue with the assessment and documentation review	✓	✓	
	1450-1500	10-minute break			
	1500-1600	Continue with the assessment and documentation review	✓	✓	

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Date & Venue	Time	Subjects	VSH (Room 1)	MFU/NHA (Room 2)	ICT Planned
	1600-1630	Assessment team discussion and preparation of closing meeting	✓	✓	
	1630-1700	Closing meeting	✓	✓	

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 this assessment there were zero (0) Major and two (2) Minor nonconformities raised. The Chin Teck Plantations Berhad 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.

Minor Nonconformities:		
Ref: 2075113-202106-N1	Area/Process: All estates	Clause: MS 2530:2013 Part-3, 4.4.5.6
	Issue Date: 29/06/2021	Due Date: Next ASA
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:	Employees have been provided with employment contracts. However, the provision for workers to submit the "notice of termination of contract" should they choose to end their service, was not stated in the contract.	
Objective Evidence:	Based on the terms of the contract of service stipulated in the employment contract for foreign workers, there is no provision for workers to submit the "notice of termination of contract" should they choose to end their service. This is not in-line with Section 12 (2) of the Employment Act 1955.	
Corrections:	The COO and Human Resource department will review employment agreements for workers and provide the revised employment contract for all workers (existing and new workers). All workers will be briefed about the revised clause.	
Root cause analysis:	The training on legal and documentation regarding employment contract to the person in charge was not effective.	
Corrective Actions:	To train the person in charge of employment agreement on legal and documentation as per Employment Act 1955.	
Assessment Conclusion:	The correction and corrective action are accepted. The evidence of effective implementation shall be verified in the next assessment visit.	

Minor Nonconformities:		
Ref: 2075113-202106-N2	Area/Process: All mills	Clause: MS 2530:2013 Part-4, 4.4.5.6
	Issue Date: 29/06/2021	Due Date: Next ASA
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:	Employees have been provided with employment contracts. However, the provision for workers to submit the "notice of termination of contract" should they choose to end their service, was not stated in the contract.	
Objective Evidence:	Based on the terms of the contract of service stipulated in the employment contract for foreign workers, there is no provision for workers to submit the "notice of termination of contract" should they choose to end their service. This is not in-line with Section 12 (2) of the Employment Act 1955.	
Corrections:	The COO and Human Resource department will review employment agreements for workers and provide the revised employment contract for all workers (existing and new workers). All workers will be briefed about the revised clause.	
Root cause analysis:	The training on legal and documentation regarding employment contract to the person in charge was not effective.	
Corrective Actions:	To train the person in charge of employment agreement on legal and documentation as per Employment Act 1955.	
Assessment Conclusion:	The correction and corrective action are accepted. The evidence of effective implementation shall be verified in the next assessment visit.	

Opportunity For Improvement		
Ref: Nil	Area/Process: Nil	Clause: Nil
Objective Evidence:	Nil	

Noteworthy Positive Comments	
1	Good relationship being maintained with surrounding communities.
2	Mill continues to maximize the use of renewable energy by using fibre and shell which produced through internal process for boiler biofuel.
3	Good cooperation from the management team in facilitating the assessment.

3.3 Status of Nonconformities Previously Identified and OFI

Major Nonconformities:		
Ref: 1924801-202001-M1	Area/Process: Estates	Clause: MS 2530:2013 Part-3, 4.3.1.1
	Issue Date: 20/06/2020	Due Date: Closed on 09/09/2020
Requirements:	i) All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. ii) Regulation 19 (3) Where a clinic exists on any estate or is established pursuant to an order under subsection (1) it shall be the duty of the employer to arrange for a registered medical practitioner to visit the clinic at least once a fortnight to supervise the operations and management of the clinic and to provide medical treatment to workers and their dependents.	
Statement of Nonconformity:	Compliance with the applicable local, state, national and ratified international laws and regulations was not effectively demonstrated.	
Objective Evidence:	Offer letter for visiting & panel medical officer – Chin Teck Plantations Berhad, Keratong Estate dated 19/5/14 to Dr Ahmad Basri Abdullah under Klinik Ikhwan and Surgery. Frequency of visit is once a month effective from 1st June 2014. The last VMO visit was on 13/6/20, 4/3/20, 8/2/20. For May & April there was no visit due to MCO which effective from 18/3/20.	
Corrections:	Our Group Health and Safety Officer has represented to the VMO about the statutory requirements and the VMO has promised that he will be able to make fortnightly visits. A new agreement signed on 23 June 2020 and VMO is required to visit the estate clinic at least once a fortnight with effect from 1st July 2020.	
Root cause analysis:	The Company has done its best to identify a registered medical practitioner who is prepared to visit the estate, whose relatively remote location and relatively poorer dirt road conditions, particularly during the rainy season, has made it much less attractive. To reduce the burden on the VMO, we ferry him to and from the estate. To make up for the shortfall in visits, it is the estate’s practice to ferry workers to Muadzam Shah for treatment as long as it is required by the Hospital Assistant – the estate does not wait for the VMO to make an appearance.	
Corrective Actions:	Going forward, should the VMO decide to terminate his service or amend his frequency of visits, we will expeditiously identify other medical practitioners to fill in temporarily or for a longer term. This may include approaching our neighbouring estate on the possibility of sharing the same VMO temporarily or permanently to meet the legal requirement. We are aware of the legal requirement as demonstrated by our other estates’ compliance on this issue but are limited by the availability and the willingness of service providers to render full service (as mandated by law) due to the location of this specific site. From our perspective, this is not symptomatic of systemic legal noncompliance but a problem arising from the operating context. Nevertheless, as mentioned in our Correction Action (CA) for Jemima & Sg. Sendayan Estates(Finding Reference: 1924801-202001-M4), the COO and the Safety and Health Department will conduct a review of all MSPO Surveillance Audit findings after all CA Plans are accepted by the auditors. A review of legal compliance shall be carried out as part of this exercise and it will be documented. This review meeting shall be completed by August 2020.	
Assessment Conclusion:	Evidence of implementation were verified;	

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	<p>i) Offer letter dated 23rd June 2020 to Dr Ahmad Basri Abdullah under Klinik Ikhwan and Surgery was evident and clearly stipulated the frequency of visit will be fortnightly effective from 1st July 2020.</p> <p>ii) Review meeting dated 18th August 2020 was verified. Non-compliance issues raised by external auditor was reviewed and action plan has been put in place for proper monitoring and control.</p> <p>The corrective action is found to be effectively implemented, thus the major NC is closed on 9/9/20. Continuous implementation will be further verified in the next audit.</p>
Verification Statement	<p><u>ASA2:</u></p> <p>At the point of this assessment, based on visitor book of KE, the last visit by a VMO (Dr. Basri of Klinik Ikhwan) was paid on 22/05/2021. The previous monthly visits were also recorded in the visitor book. Report of the VMO visits were also well maintained for verification. There was no recurrence of non-conformity. Thus, the NCR remains closed.</p>

Major Nonconformities:		
Ref: 1924801-202001-M2	Area/Process: Estates	Clause: MS 2530:2013 Part-3, 4.4.5.6
	Issue Date: 20/06/2020	Due Date: Closed on 09/09/2020
Requirements:	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.	
Statement of Nonconformity:	Contract of employment period signed contrary with the work permit issued by Immigration Department.	
Objective Evidence:	<p><u>Keratong Estate Division B</u></p> <p>i) Passport no. 06078347, date join: 14/1/13 visa/work permit: 14/1/20 -13/1/21 Clause 2: Tempoh kerja, tanggal & jam/waktu kerja seharian bermula "Kontrak kerja ini sah diperakukan bagi tempoh mengikut permit kerja dari tarikh ia melapurkan diri berkerja bermula 14/1/19 – 13/1/21."</p> <p>ii) Passport no. P2931500, date join: 3/4/12 visa/work permit: 3/4/19 - 2/4/20, in progress of renewal via Myeg, refer to invoice no. IMM/FW/TX/1584498403184 dated 18/3/20. Clause 2: Tempoh kerja, tanggal & jam/waktu kerja seharian bermula "Kontrak kerja ini sah diperakukan bagi tempoh mengikut permit kerja dari tarikh ia melapurkan diri berkerja bermula 3/4/19 – 2/4/21."</p> <p><u>Jemima & Sq. Sendayan Estates</u></p> <p>i) Indonesian – B6828907, work permit/visa: until 22/4/20, in progress of renewal via Myeg, refer to invoice, IMM/FW/TX11587571036222. Contract signed date on 1st February 2020 and offered for 2 years. Pakistani-VV6893052, work permit/visa: 17/1/20 -17/2/21 Contract offered – probational contract for 3 month, shall be offered for extension of contract on yearly basis. Signed date 1/2/20 Pakistani-TF4105952, work permit/visa: 17/11/19-27/11/20 Contract offered – probational contract for 3 month, shall be offered for extension of contract on yearly basis. Signed date 1/2/20</p>	

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<p>Corrections:</p>	<ul style="list-style-type: none"> i) Remind all workers in a briefing that their employment (after the first contract) may only be extended annually ii) Provide revised agreement with one-year extension clause to workers who have agreed to renew their contracts
<p>Root cause analysis:</p>	<p>The agreement signed between the Company and the workers exceeded the statutory mandated duration of 1 year per renewal for extension of employment beyond the first contract. The law only allows for annual renewals and hence will supersede any clause in the agreements signed between the Company and the workers that contradicts it.</p> <p>Any stated period in the agreement beyond one year was done for administrative convenience (to avoid having to regularly renew the agreements) and not to compel the workers to serve with the Company.</p>
<p>Corrective Actions:</p>	<p>The COO and Human Resource department will review employment agreements for workers across the Group by 31st August 2020. Legal counsel will be sought to re-draft employment / extension agreements, if appropriate. New agreements projected to be ready for distribution to operating units by 31st October 2020. In the meantime, we will utilize the revised agreement with 1 year extension clause. Meantime, an email memo had been sent out by the COO to the Operating Units, and reminded the OUs to ensure the agreements do not exhibit the above problems.</p>
<p>Assessment Conclusion:</p>	<p>Evidence of implementation were verified;</p> <p><u>Keratong Estate</u></p> <ul style="list-style-type: none"> i) Progress chart on the reissuance of employment contract was sighted which plan from June and to be completed in November 2020. An internal memo issue by COO with regards to contract of employment issue to all head of operating units to review and check on the current contract for rectification. ii) New contract agreement was sighted for workers ID (06078347 and P2931500) which signed on 22nd June 2020 in line with date the VISA expiry and other pertinent terms and conditions required. iii) Briefing to workers was given on 24 /6/20 and 27/6/20 to all workers on contract agreement renewal process. <p><u>Jemima & Sg Sendayan Estate</u></p> <ul style="list-style-type: none"> i) Progress chart on the reissuance of employment contract was sighted which plan from June and to be completed in November 2020. An internal memo issue by COO with regards to contract of employment issue to all head of operating units to review and check on the current contract for rectification. ii) New contract agreement was sighted for workers ID (B6828907, VV6893052, TF4105952) which signed on 22nd June 2020 in line with date the VISA expiry and other pertinent terms and conditions required. No probational term included in the latest contract. iii) Briefing to workers was given on 26/6/20 to all workers on contract agreement renewal process. <p>The corrective action is found to be effectively implemented, thus the major NC is closed on 9/9/20. Continuous implementation will be further verified in the next audit.</p>
<p>Verification Statement</p>	<p><u>ASA2:</u></p>

	Based on samples of the contract agreements between CTP and workers, the periods of employment have been aligned with the period of work permits. There was no recurrence of non-conformity. Thus, the NCR remains closed.
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Major Nonconformities:		
Ref: 1924801-202001-M3	Area/Process: Mills	Clause: MS 2530:2013 Part-4, 4.4.5.6
	Issue Date: 20/06/2020	Due Date: Closed on 09/09/2020
Requirements:	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.	
Statement of Nonconformity:	Contract of employment period signed contrary with the work permit issued by Immigration Department	
Objective Evidence:	<u>Keratong Estate POM</u> i) Nepalese - Passport no. 05964235 (02165), first term (3 years renew on yearly basis) - contract signed on 19/9/18 issued for 2 years (16/4/18 – 15/4/20), VISA renewal until 14/4/20	
Corrections:	i) Remind all workers in a briefing that their employment (after the first contract) may only be extended annually ii) Provide revised agreement with one-year extension clause to workers who have agreed to renew their contracts	
Root cause analysis:	The agreement signed between the Company and the workers exceeded the statutory mandated duration of 1 year per renewal for extension of employment beyond the first contract. The law only allows for annual renewals and hence will supersede any clause in the agreements signed between the Company and the workers that contradicts it. Any stated period in the agreement beyond one year was done for administrative convenience (to avoid having to regularly renew the agreements) and not to compel the workers to serve with the Company.	
Corrective Actions:	The COO and Human Resource department will review employment agreements for workers across the Group by 31st August 2020. Legal counsel will be sought to redraft employment / extension agreements, if appropriate. New agreements projected to be ready for distribution to operating units by 31st October 2020. In the meantime, we will utilize the revised agreement with 1 year extension clause. Meantime, an email memo had been sent out by the COO to the Operating Units, and reminded the OUs to ensure the agreements do not exhibit the above problems.	
Assessment Conclusion:	Evidence of implementation were verified; i) Progress chart on the reissuance of employment contract was sighted which plan from June and to be completed in November 2020. An internal memo issue by COO with regards to contract of employment issue to all head of operating units to review and check on the current contract for rectification. ii) New contract agreement was sighted for workers ID (05964235) which signed on 22nd June 2020 in line with date the VISA expiry and other pertinent terms and conditions required. iii) Briefing to workers was given on 24 /6/20 and 27/6/20 to all workers on contract agreement renewal process.	

	The corrective action is found to be effectively implemented, thus the major NC is closed on 9/9/20. Continuous implementation will be further verified in the next audit.
Verification Statement	<u>ASA2:</u> Based on samples of the contract agreements between CTP and workers, the periods of employment have been aligned with the period of work permits. There was no recurrence of non-conformity. Thus, the NCR remains closed.

Major Nonconformities:

Ref: 1924801-202001-M4	Area/Process: Estates	Clause: MS 2530:2013 Part-3, 4.5.3.3
	Issue Date: 20/06/2020	Due Date: Closed on 09/09/2020

Requirements:	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.
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Statement of Nonconformity:	The management have not done a Notification of Schedule Waste for SW305 and SW 306. The inventory of the Schedule Wastes items was not updated for the month April and May 2020.
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Objective Evidence: Regulation 3: Notification of generation of Schedule Wastes; (1) Every waste generator shall, within 30 days from the date of generation of schedule wastes, notify the Director General of the new categories and quantities of schedule wastes which are generated. (2) The notification given under sub regulation (1) shall include the information provided in the Second Schedule.

Waste Code	Quantity (mt/month)		
	March (Notification)	April	May
SW102	0.0400	NA	0.00
SW110	0.0250	NA	0.00
SW404	0.0002	NA	0.00
SW409 (Chemical Jar)	0.8300	NA	0.00
SW409	3.5000	NA	0.00
SW410 (Oil Filter)	0.2000	NA	0.00
SW410 (PPE)	0.0500	NA	0.00
SW305	NA	NA	0.350
SW306	NA	NA	0.170

Jemima & Sq. Sendayan Estates

The management have not done a Notification of Schedule Waste for SW305 and SW 306.

The inventory of the Schedule Wastes items was not updated for the month April and May 2020. The Amount Generated and Amount Balance of the SW Estate Inventory does not tally with the e-Swiss Inventory. Date of Generation of the Schedule Wastes could not be justified.

Sampled

The store has generated schedule waste such as empty chemical drum (May – 19 Drums, April – 25 Drums and March – 43 Drums).

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<p>Corrections:</p>	<p>SW305 & SW306 will be updated by notifying eSWIS. However, the system is currently down. Evidence will be provided as soon as it is operating.</p> <p>We have requested the registered Scheduled Waste disposer to collect and dispose of the Scheduled Waste.</p>																				
<p>Root cause analysis:</p>	<p>Due to the MCO, we were unable to dispose of Scheduled Waste as planned. As a result our last notification was in March 2020.</p> <p>We omitted SW305 and SW306 from this eSWIS notification even though we had some of both items in our own SW inventory. This was because the quantities were not large for both items.</p>																				
<p>Corrective Actions:</p>	<p>Going forward, the Estate’s Environmental Officer will provide a monthly update to the Estate Manager on the status of Environmental Quality (SWs) Regulations 2005 - Schedules 2, 5 & 6.</p> <p>The COO will conduct a review of all MSPO Surveillance Audit findings with the Safety and Health (S&H) department after all Corrective Action Plans are accepted by the auditors by August 2020. (The S&H Department was assigned to conduct MSPO internal audit for 2020.) Subsequently, all audit findings will be circulated to Group OUs for their information as practiced after the Certification Audit. This will include reminders on timely disposal of SW.</p> <p>As part of the above, the COO will fix a few items for consistent review by OUs during the quarterly MSPO meetings. One of these items will be the monitoring of the status of SW disposal. The COO will also require the Safety and Health Department to include a review of SW disposal as part of their agenda during their regular visits to our estates. Finally, the COO will also require the S&H department to review SW inventory record keeping and standardise the template across the Group.</p>																				
<p>Assessment Conclusion:</p>	<p>Evidence of implementation were verified;</p> <ul style="list-style-type: none"> i) Verified updated notification scheduled 2, 5 and 6 for Jemima & Sg Sendayan Estate. Disposal arrangement has been made with license contractor, Kualiti Alam Sdn Bhd on 1/7/20 for SW110, SW305, SW306, SW409 and SW410. ii) Review meeting dated 18th August 2020 was verified. Non-compliance issues raised by external auditor was reviewed and action plan has been put in place for proper monitoring and control. iii) Jemima & Sg Sendayan estate has carried out a management review meeting on 24th June 2020 to review the external audit results and other pertinent elements. Long term measures has been identified to ensure no recurrence of such issues. <p>The corrective action is found to be effectively implemented, thus the major NC is closed on 9/9/20. Continuous implementation will be further verified in the next audit.</p>																				
<p>Verification Statement</p>	<p><u>ASA2:</u></p> <p>For Keratong Estate, sighted evidence of Notification of generation of Schedule Waste for the month of April, May, and June 2021. Refer record as reference number ASCR31/152/000/033 for Keratong Estate. Record as below:</p> <table border="1" data-bbox="448 1794 1211 1935"> <thead> <tr> <th>Month</th> <th>Date</th> <th>SW305</th> <th>SW410</th> <th>SW422</th> </tr> </thead> <tbody> <tr> <td>April 21</td> <td>24.04.2021</td> <td>0.3820</td> <td>0.0320</td> <td>0.0120</td> </tr> <tr> <td>May 21</td> <td>31.05.2021</td> <td>0.2010</td> <td>0.0210</td> <td>0.0000</td> </tr> <tr> <td>June 21</td> <td>25.06.2021</td> <td>0.1820</td> <td>0.0310</td> <td>0.0240</td> </tr> </tbody> </table> <p>Disposal for schedule waste has been conducted on 26.04.2021 by Kualiti Alam Sdn Bhd. Refer Consignment note: 20210426112HVOIAE. There is no SW306 generated</p>	Month	Date	SW305	SW410	SW422	April 21	24.04.2021	0.3820	0.0320	0.0120	May 21	31.05.2021	0.2010	0.0210	0.0000	June 21	25.06.2021	0.1820	0.0310	0.0240
Month	Date	SW305	SW410	SW422																	
April 21	24.04.2021	0.3820	0.0320	0.0120																	
May 21	31.05.2021	0.2010	0.0210	0.0000																	
June 21	25.06.2021	0.1820	0.0310	0.0240																	

	as per checking. Verified through interview document checking. Thus, this major NC remain closed.
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Minor Nonconformities:					
Ref: 1924801-202001-N1	<table border="1" style="width: 100%;"> <tr> <td>Area/Process: Estates</td> <td>Clause: MS 2530:2013 Part-3, 4.4.4.2</td> </tr> <tr> <td>Issue Date: 20/06/2020</td> <td>Due Date: Closed on 29/06/2021</td> </tr> </table>	Area/Process: Estates	Clause: MS 2530:2013 Part-3, 4.4.4.2	Issue Date: 20/06/2020	Due Date: Closed on 29/06/2021
Area/Process: Estates	Clause: MS 2530:2013 Part-3, 4.4.4.2				
Issue Date: 20/06/2020	Due Date: Closed on 29/06/2021				
Requirements:	The occupational safety and health plan should cover the following: Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite				
Statement of Nonconformity:	The first aid boxes at the Chemical Store & Workshop were found to be with insufficient supplies. There was no monitoring done to replenish the first aid boxes on a regular basis.				
Objective Evidence:	Under the Guidelines on First Aid in the Workplace (DOSH) 2004; 5.3 Contents; First aid boxes should contain a sufficient quantity of suitable first-aid materials. They should not contain oral medication of any kind other than those required for first-aid treatment. It is essential that first-aid boxes be checked frequently so as to make sure they are fully equipped, and all items are usable. Materials used should be replaced as soon as possible. Gua Musang Estate: The first aid boxes at the Chemical Store & Workshop were found to be with insufficient supplies. There was no monitoring done to replenish the first aid boxes on a regular basis.				
Corrections:	We immediately replenished the supplies in the first aid boxes at the chemical store and workshop according to minimum requirement of first aid box in OSH regulations. (Attached with pictures). The HA has also checked all the other first aid boxes to ensure the supplies on 24 June 2020.				
Root cause analysis:	Our previous hospital assistant (HA) resigned in March 2020 and a new HA joined in June 2020. During the period where the position was vacant, estate management did not appoint a person to monitor the condition of the first aid boxes.				
Corrective Actions:	Monthly First Aid Box Inspection Checklist is implemented to monitor minimum quantity of supplies in first aid box. At the same time, worker representatives are appointed to take responsibility for first aid boxes respectively at certain station. They will inform the HA as long as the first aid boxes are used				
Assessment Conclusion:	Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next surveillance assessment.				
Verification Statement	<u>ASA2:</u> First aid training was conducted by the estate management on 17.04.2021 which involve 6 workers from different workstation. The training was delivered by the hospital attendance. Sighted evidence of monthly inspection of first aid box has been done by hospital attendance as per document First Aid Box Usage List and First aid Box Monthly Check Up 2021 for the month of April, May, and June 2021. 20 items have been listed for 1 unit First Aid Box content. Interview for First aider found have good awareness and all items checked through video conference found in order. Thus, Minor NC was closed.				

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Minor Nonconformities:		
Ref: 1924801-202001-N2	Area/Process: Mills	Clause: MS 2530:2013 Part-4, 4.4.4.2
	Issue Date: 20/06/2020	Due Date: Closed on 29/06/2021
Requirements:	The occupational safety and health plan should cover the following: Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite	
Statement of Nonconformity:	The first aid boxes at the Chemical Store & Workshop were found to be with insufficient supplies. There was no monitoring done to replenish the first aid boxes on a regular basis.	
Objective Evidence:	Under the Guidelines on First Aid in the Workplace (DOSH) 2004; 5.3 Contents; First aid boxes should contain a sufficient quantity of suitable first-aid materials. They should not contain oral medication of any kind other than those required for first-aid treatment. It is essential that first-aid boxes be checked frequently so as to make sure they are fully equipped, and all items are usable. Materials used should be replaced as soon as possible. Gua Musang Estate POM: The first aid boxes at the Workshop and Office were found to be with insufficient supplies. There was no monitoring done to replenish the first aid boxes on a regular basis.	
Corrections:	We immediately replenished the supplies in the first aid boxes at the chemical store and workshop according to minimum requirement of first aid box in OSH regulations. The HA has also checked all the other first aid boxes to ensure the supplies on 24 June 2020.	
Root cause analysis:	Our previous hospital assistant (HA) resigned in March 2020 and a new HA joined in June 2020. During the period where the position was vacant, estate management did not appoint a person to monitor the condition of the first aid boxes.	
Corrective Actions:	Monthly First Aid Box Inspection Checklist is implemented to monitor minimum quantity of supplies in first aid box. At the same time, worker representatives are appointed to take responsibility for first aid boxes respectively at certain station. They will inform the HA as long as the first aid boxes are used.	
Assessment Conclusion:	Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next surveillance assessment.	
Verification Statement	<u>ASA2:</u> First aid training was conducted by the Mill management on 25.06.2021 which involve 5 workers from different workstation. The training was delivered by the hospital attendance. Sighted evidence of monthly inspection of first aid box has been done by hospital attendance as per document First Aid Box Usage List and First aid Box Monthly Check Up 2021 for the month of April, May, and June 2021. 20 items have been listed for 1 unit First Aid Box content. Interview for First aider found have good awareness and all items checked through video conference found in order. Thus, Minor NC was closed.	

3.4 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1783969-201905-N1	Minor - 4.1.2.2 (Part 3 and Part 4)	31/05/2019	Closed on 20/06/2020
1783969-201905-N2	Minor - 4.3.1.1 (Part 4)	31/05/2019	Closed on 20/06/2020
1783969-201905-N3	Minor - 4.4.2.5 (Part 4)	31/05/2019	Closed on 20/06/2020
1783969-201905-N4	Minor - 4.4.5.3 (Part 4)	31/05/2019	Closed on 20/06/2020
1783969-201905-N5	Minor - 4.4.5.7 (Part 4)	31/05/2019	Closed on 20/06/2020
1783969-201905-N6	Minor - 4.4.6.2 (Part 4)	31/05/2019	Closed on 20/06/2020
1783969-201905-N6	Minor - 4.5.3.3 (Part 4)	31/05/2019	Closed on 20/06/2020
1924801-202001-M1	Major – 4.3.1.1 (part 3)	20/06/2020	Closed on 09/09/2020
1924801-202001-M2	Major – 4.4.5.6 (part 3)	20/06/2020	Closed on 09/09/2020
1924801-202001-M3	Major – 4.4.5.6 (part 4)	20/06/2020	Closed on 09/09/2020
1924801-202001-M4	Major – 4.4.5.3 (part 3)	20/06/2020	Closed on 09/09/2020
1924801-202001-N1	Minor – 4.4.4.2 (part 3)	20/06/2020	Closed on 29/06/2021
1924801-202001-N2	Minor – 4.4.4.2 (part 4)	20/06/2020	Closed on 29/06/2021
2075113-202106-N1	Minor – 4.4.5.6 (part 3)	29/06/2021	Open
2075113-202106-N2	Minor – 4.4.5.6 (part 4)	29/06/2021	Open



3.5 Issues Raised by Stakeholders

IS #	Description
1	<p>Issues: <u>Contractors/suppliers:</u> Have had good relationship with the company for long time and no major issues so far. Nonetheless, they are aware of the mechanism for complaint/grievance management of the company. Fair contract award was also observed by the company. CTP had communicated to them about company's sustainable policies and able to explain the intention of conforming MSPO requirements.</p> <p>Management Responses: Continue to have good relationship with the contractors/suppliers.</p> <p>Audit Team Findings: No further action.</p>
2	<p>Issues: <u>Community/neighbouring villages:</u> Have had good relationship with the company for long time and no major issues so far. Nonetheless, they are aware of the mechanism for complaint/grievance management of the company. They were happy about being permitted to use the estate road for them to reach their destinations and occasionally assisting them in cleaning drainage. They were also invited for stakeholders meeting and allowed to provide their inputs.</p>

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	Management Responses: Continue to have good relationship with the surrounding communities.
	Audit Team Findings: No further action.

Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings	
Based on the findings during the assessment Chin Teck Plantations Berhad Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of Chin Teck Plantations Berhad Certification Unit is approved and/or continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: Ng Yeen Chern	Name: Valence Shern
Company name: Chin Teck Plantations Berhad	Company name: BSI Services Malaysia Sdn Bhd
Title: Chief Operating Officer	Title: Lead Auditor
Signature: 	Signature: 
Date: 14/09/2021	Date: 03/09/2021

Appendix A: Summary of the findings by Principles and Criteria

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
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	A policy for the implementation of MSPO shall be established. - Major compliance -	Chin Teck Plantations Bhd has established its various policies to drive the organization towards the implementation of MSPO. Among the policies are: - Sustainability Policy - Environmental Policy - Social and Human Rights Policy - Occupational Safety and Health Policy	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	The statement about the organisation shall continuously reviews and improve operations with respect to social, environmental and economic sustainability, guided by the principles of MSPO and best practice is emphasized in the Sustainability Policy.	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Internal audit implemented based on MSPO Internal Audit Procedure; Doc. # MSPO-P1-C2, ver. 1.00, dated 26/08/2018, rev. 1.02, dated 01/03/2021. Latest internal audits were conducted on the following dates: GME POM & GME 04-06/05/2021 – no NCR JE: 01-02/04/2021 – 1 NCR	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		KE: 21/04/2021 – no NCR	
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	Internal audit procedure is documented in MSPO Internal Audit Procedure; Doc. # MSPO-P1-C2, ver. 1.00, dated 26/08/2018, rev. 1.02, dated 01/03/2021. Root cause is identified and stated in the NCR form to implement the necessary corrective action.	Complied
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	Internal audit reports for all the assessed operating units were available for verification. The results of the internal audit were also part of the management review agenda.	Complied
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	The management review procedure referred to Ref no.: MSPO-02 dated 01/07/2018. The management reviews were conducted on 25/05/2021 (GME POM & GME), 24/05/2021 (JE) and 26/05/2021 (KE). Based on minutes, agenda is in accordance to MR review procedure.	Complied
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. - Major compliance -	The continual improvement plan was established and sighted as below: a. Appoint new visiting medical doctor for estate. b. Advertising job vacancies. c. Providing free PPE for all workers.	Complied
4.1.4.2	The company shall establish a system to improve practices in line with new information and techniques or new industry	The estate management has scheduled an annual program for training and briefing to the workers. When the new information or technique	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	standards and technology (where applicable) that are available and feasible for adoption. - Major compliance -	need to be disseminated to the workers, the management will slot in and amend the annual training program. Sighted evidence of Management Review on Continuous Improvement Plan for Keratong Estate dated 24/05/2021 prepared by Ng Yeen Chern.	
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 -	Action plan to provide necessary resources of new training is included in the annual training program. They can amend and slot in the new training to the current annual training program whenever necessary. Sighted evidence of Management Review on Continuous Improvement Plan for Keratong Estate dated 24/05/2021 prepared by Ng Yeen Chern.	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes. - Major compliance -	Communication implementation were based on procedure title: Stakeholder Communication & Consultation Procedure, MSPO-P2-C2, ver. 1.00, rev. 1.02, dated 08/05/2019. Stakeholders records will use the following: <ul style="list-style-type: none"> - Stakeholders List (Appendix 1) - Stakeholders Concerns and Resolution Matrix (Appendix 2) - Grievances/Complaints Form (Appendix 3) - Information Request Form – MSPO Related (Appendix 4) Records of communication were available at individual operating units audited.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.2.1.2	<p>Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p>Management has made the documents public as per List of Public Documents available for MSPO Stakeholder Inspection, Doc No: MSPO-P2-C1 Version Control 1 dated 01 January 2019.</p> <p>Among the public document shared are:</p> <ol style="list-style-type: none"> 1. All MSPO policies and licenses 2. Safety and health plan 3. Plans and impact assessment relating to social impact 4. Plans and impact assessment relating to environmental impact and pollution prevention plan 5. Records of complaints and grievances 6. Continual improvement plan 	Complied
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p>	<p>Implementation and consultation with relevant stakeholders is based on procedure title: Stakeholder Communication & Consultation Procedure, MSPO-P2-C2, ver. 1.00, rev. 1.02, dated 08/05/2019.</p>	Complied
4.2.2.2	<p>A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.</p> <p>- Minor compliance -</p>	<p>The Estate Mangers are the appointed PIC to handle any issues related to Indicator 1 (Clause 3 of the above procedure).</p>	Complied
4.2.2.3	<p>List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.</p> <p>- Major compliance -</p>	<p>Stakeholder list for all the visited estates were available from various background, which are surrounding communities, government agencies, contractors & suppliers, neighbouring estates, etc. The lists were updated from time to time whenever necessary. The last updates were on 13/01/2021 (GME & mill), 05/02/2021 (KE) and 17/02/2021 (JE).</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance																
Criterion 4.2.3 – Traceability																			
4.2.3.1	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). - Major compliance -	Chin Teck Plantations Bhd has established SOP for Traceability, dated on 26.08.2018, version no: 01 and revision no: 1.01. This SOP has detailed the workflow for tracing the origins of the FFB and the despatch of the CPO or PK.	Complied																
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Inspection of traceability was conducted on daily basis. Field conductor will record the basic information such as harvester’s name, field assigned, quantity and date. This information later will be compiled in the office by the office staff and verified by the assistant manager.	Complied																
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	Each estate management has appointed respective officer to be responsible for transparency and traceability. a. Gua Musang Estate: Ms Nor Wahida Bin Deraman was appointed on 01.01.2019. b. Jemima & Sg. Sendayan Estates: Mr. Jaafar Bin Nayan was appointed on 01.06.2019. c. Keratong Estate: Ms Farawahida was appointed on 01.01.2021.	Complied																
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	Both estates keep the record of storage, sales and delivery of FFB. Sample for Keratong Estate as below: <table border="1" data-bbox="1070 1150 1753 1286"> <tr> <td>Date</td> <td>20/01/2021</td> <td>31/03/2021</td> <td>30/11/2020</td> </tr> <tr> <td>Ticket No.</td> <td>109056</td> <td>113257</td> <td>105697</td> </tr> <tr> <td>Lorry No.</td> <td>JQJ6680</td> <td>JQJ6680</td> <td>JQJ6680</td> </tr> <tr> <td>Weight</td> <td>24.36 MT</td> <td>26.07 MT</td> <td>23.05 MT</td> </tr> </table>	Date	20/01/2021	31/03/2021	30/11/2020	Ticket No.	109056	113257	105697	Lorry No.	JQJ6680	JQJ6680	JQJ6680	Weight	24.36 MT	26.07 MT	23.05 MT	Complied
Date	20/01/2021	31/03/2021	30/11/2020																
Ticket No.	109056	113257	105697																
Lorry No.	JQJ6680	JQJ6680	JQJ6680																
Weight	24.36 MT	26.07 MT	23.05 MT																
4.3 Principle 3: Compliance to legal requirements																			

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.3.1 – Regulatory requirements			
<p>4.3.1.1</p>	<p>All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p>	<p>Licenses and permits were made available to the audit team.</p> <p><u>Gua Musang Estate</u></p> <ul style="list-style-type: none"> a. MPOB license for estate, 501492402000, expired on 31.03.2022. b. “Kelulusan Kerja Lebih Masa (130 jam)”, BHG.PU/9/134 Jld 31(33), expired on 30.06.2021. c. Diesel permit no: P:000834, expired on 09.05.2022. d. “Permit Barang Kawalan Berjadual”, ref no: KPDKKK/GMG/UB/07/07/PA/67/16D, expired on 09.05.2022. e. Water extraction license: GWAL0047/2018, expired on 30.09.2021. <p><u>Jemima & Sg. Sendayan Estates</u></p> <ul style="list-style-type: none"> a. Malaysian Palm Oil Board license no: 501233602000, expired on 31.03.2022. b. “Permit Kawalan Berjadual”, ref no: PKPDNHEP(PD)600-2/3/24, expired on 31.03.2022. c. “Perakuan Penentuan Timbang & Sukat”, D041090, expired on 05.03.2022. d. “Pengadung Tekanan Tak Berapi”, Akta Kilang & Jentera 1967, PMT-NS/2137094, expired on 05.04.2022. <p><u>Keratong Estate</u></p> <ul style="list-style-type: none"> a. Malaysian Palm Oil Board no 501575102000, license expiry date on 30.09.2021 	<p>Complied</p>

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		b. "Permit Kawalan Berjadual" no PHG/RPN/017/82 SK(D) expiry date on 16.08.2021. c. "Perakuan Penentuan Timbang & Sukat" no 01544546KP Metrology Corporation Malaysia Sdn Bhd, expiry date on 12.08.2021. d. "Pengadung Tekanan Tak Berapi", Akta Kilang & Jentera 1967, PMT-26052, expiry date on 15.02.2022.	
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register. - Major compliance -	Both estates had prepared the register of laws and list of relevant acts, laws and regulations, revised on 18.05.2021, doc no: MSPO-P3-C1, version no: 02. The register consists of Occupational Safety & Health act, environment, water and human resources. The estate management has updated their register by including the regulation related to the COVID-19 pandemic. a. Prevention & control of infectious diseases regulation 2020. b. Temporary measures for reducing the impact of coronavirus disease 2019 (COVID-19) Act 2020.	Complied
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	Updated for the legal requirement will be conducted by the sustainability team from the headquarters. Sighted the team has updated the relevant regulation regarding on the COVID-19 pandemic.	Complied
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. - Minor compliance -	Each estate appointed their respective employee to be responsible for Legal Compliance. Gua Musang Estate management has appointed Ms Nor Mazila Binti Sulaiman on 01.01.2020.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Jemima & Sg. Sendayan Estates Management has appointed Ms. Mazarin Binti Mohd Isa on 01.01.2019.</p> <p>Keratong Estate Management has appointed Ms. Noraseken Binti Ibrahim on 01.01.2021</p>	
Criterion 4.3.2 – Lands use rights			
4.3.2.1	<p>The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.</p> <p>- Major compliance -</p>	Chin Teck Plantations Bhd. does not diminish the land use rights of other users.	Complied
4.3.2.2	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.</p> <p>- Major compliance -</p>	<p>Chin Teck Plantations Bhd. was able to provide legal land titles to demonstrate its land use right. Details of land titles are as follows:</p> <ul style="list-style-type: none"> - GME: Land title #19935, area: 1,618.3953 Ha, registered on 23/04/1998, owner: Chin Teck Plantations Bhd. - KE Div. A: Land title #7218, area: 4,044.7407 Ha, registered on 01/07/2005, owner: Chin Teck Plantations Bhd. - JE has 30 land titles with a total area of 1,618.4608 Ha, owner: Chin Teck Plantations Bhd. 	Complied
4.3.2.3	<p>Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p> <p>- Major compliance -</p>	<p>The estates have clearly demarcated their legal boundary using various methods. Based on pictures captured, among the methods are as follows:</p> <ul style="list-style-type: none"> GME – concrete pegs painted with red colour JE – concrete pegs painted with red colour, trenching KE – PVC pipe filled with concrete, trenching 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There is no dispute with any stakeholders with regards to land use right. Should there be any, FPIC as per established procedure title: FPIC with Respect to Land Use Rights and Customary Rights; MSPO-P3-C2; Rev. 1.01; Date: 22/5/2019, will apply.	Complied
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	There is no customary rights land at all the sampled estates.	Complied
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	There is no customary rights land at all the sampled estates.	Complied
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	There is no customary rights land at all the sampled estates.	Complied
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	The assessment of Social Impact is guided by Social Impact Assessment (SIA) Procedure, MSPO-09, rev. 1.01, dated 30/08/2018. SIA were done by the estates by utilising a checklist during a stakeholder consultation meeting. The checklist was meant to collect information	Complied

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		related to social impact evaluation. The last consultations were carried out on 20/03/2021 (GME), 28/02/2021 (KE) and 09/04/2021 (JE). The information was then transferred to Stakeholders Concerns and Resolution Matrix where action plans to resolve the concerns raised are documented. The estates found to have responded the concerns effectively.	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	The system for dealing with complaints and grievances was established and documented in Grievance & Complaints Handling Procedure, MSPO-P4-C2, rev. 1.01, dated 08/05/2019.	Complied
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. - Major compliance -	Based on the sampled complaints from the workers which were mostly on housing facility defects, the complaints were resolved on timely manner.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - Minor compliance -	<u>GME, KE, JE</u> Governed under Grievance & Complaints Handling Procedure, MSPO-P4-C2, rev. 1.01, dated 8/5/2019 Ref.: Grievances/Complaints/Feedback Form. Mostly complaints received were on housing defects. Based on the complaint form records, all the issues were resolved within the timeframe defined in the procedure i.e. <14 days.	Complied
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance -	The employees and the surrounding communities were made aware of the complaint procedure through stakeholders meeting and regular briefing. Based on interview, the sampled employees and stakeholders had sufficient awareness on the procedure.	Complied

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4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance -	Last 24 months recoded complaints and resolutions were still available as the following samples: GME: 07/04/2019 KE: 11/11/2019 (first complain)	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - Minor compliance -	Among the contributions provided by the operating units since the last assessment are: GME – distribution of beef among the workers during Hari Raya Haji. No request from external due to MCO. KE – monetary donation to surrounding authorities	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance -	Chin Teck Plantations Berhad has developed Occupational Safety & Health Policy, which was signed by Mr. Goh Wei Lei, Executive Chairman on 13.05.2019. The policy emphasis on the commitment of the company in complying with the OSH Act 1994, Factory & Machinery Act 1967 and other related applicable requirements. Communication and implementation of the safety policy and plan were explained under indicator 4.4.4.2.	Complied
4.4.4.2	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.	<u>Jemima & Sg. Sendayan Estates</u> a. The policy is communicated to the workers thru the morning briefing and relevant training conducted by the estate management based on their work station. b. HIRARC was made available to the audit team, prepared by Ms. Nursyakilla Hanum Binti Abd Halim as safety supervisor. The HIRARC	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:</p> <ul style="list-style-type: none"> i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied <p>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 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>was reviewed on 21.01.2021, and approved by the estate manager, Mr. Lim Etock.</p> <p>c. Training on the safe used of chemical for the workers who directly handle the chemical was conducted for year 2021. Sighted as follow:</p> <ul style="list-style-type: none"> a. Safe working procedure for spraying gang, conducted on 02.06.2021, attended by 5 participants. b. Safe working procedure for manuring gang, conducted on 12.04.2021, attended by 7 participants. c. Safe working procedure for chemical mix, conducted on 05.04.2021, attended by 2 participants. <p>Safety Data Sheets related to the chemical used in the estate were made available to the audit team.</p> <p>d. Estate management has provided personal protective equipment to the workers based on their scope of work. PPE issuance record was made available to the audit team.</p> <p>e. Estate has established safe working procedure for chemical handling. This procedure provides guidelines for receiving & storage of chemical, dispenses of chemical from store to mixing area, chemical delivery to field, cleaning spraying equipment and scheduled waste disposal.</p> <p>f. The estate management has appointed Ms Nursyakilla Hanum Binti Abd Halim as the MSPO Committee Safety & Health Officer, dated on 01.01.2021.</p> <p>g. First meeting for OSH committee was conducted on 30.03.2021, chaired by Mr Lim Etock (estate manager) and attended by 18 participants from various work station.</p>	

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Criterion / Indicator	Assessment Findings	Compliance
<p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>h. Procedure for emergency response and accident was communicated to the employees thru training and morning briefing.</p> <p>i. First aid training was conducted by the estate management on 26th-28th April 2021 which involve 16 workers from different work station. The training was delivered by the hospital attendance.</p> <p>j. Records of all accidents had been well kept by the estate management.</p> <p><u>Gua Musang Estate</u></p> <p>a. The policy is communicated to the workers thru the morning briefing and relevant training conducted by the estate management based on their work station.</p> <p>b. HIRARC was made available to the audit team, prepared by Mr. Mohamad Shaifullah Shaari as safety supervisor. The HIRARC was last reviewed on 26.10.2020, and approved by the senior estate assistant manager, Mr. Lee Khen Siang.</p> <p>c. Training and briefing to the workers who exposed to the chemicals was conducted by the management. Latest training conducted on 13.02.2021.</p> <p>d. PPE issuance records were made available to the audit team.</p> <p>e. The mill management has established a safe working procedure in handling chemical. Some of the procedure's outlines are receiving & storage of chemical, chemical dispenses from store to mixing area and scheduled waste disposal.</p> <p>f. The mill has appointed Mr. Mohamad Saifullah Bin Shaari as the committee secretary for OSH Committee. The appointment was made on 02.01.2021.</p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>g. The OSH committee has conducted their first OSH meeting for year 2021 on 22.03.2021. The meeting was chaired by Mr Lee Khen Siang (Senior Assistant Manager). Among the agenda discussed during the meeting were verified the agenda from previous meeting, workstation inspection, training & briefing, information on accident or near miss accident and others.</p> <p>h. Training on emergency response was conducted on 18.04.2021, delivered by Mr. Mohamad Shaifullah Shaari.</p> <p>i. First aid training was conducted on 21.02.2021 to 8 workers. Sighted the training records and the list of the first aider.</p> <p>j. Accident records were well kept by the estate management. Sighted the JKPP6 and JKPP8 form prepared by the estate management.</p> <p><u>Keratong Estate</u></p> <p>a. The policy is communicated to the workers thru the morning briefing and relevant training conducted by the estate management based on their workstation. Sighted evidence of Briefing Company Policy dated 27.05.2021.</p> <p>b. HIRARC was made available to the audit team, prepared by Gajendran Subramaniam as SHO. The HIRARC was reviewed on 21.01.2021, and approved by the estate manager, Mr. Chin Yin Lum.</p> <p>c. Training on the safe used of chemical for the workers who directly handle the chemical was conducted for year 2021. Sighted as follow:</p> <p style="margin-left: 20px;">a. SDS, HIRARC, SOP & PPE Training conducted on 29.05.2021, attended by 3 participants.</p> <p style="margin-left: 20px;">b. ERT – First Aiders Training conducted on 17.04.2021, attended by 6 participants.</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Safety Data Sheets related to the chemical used in the estate were made available to the audit team.</p> <ul style="list-style-type: none"> d. Estate management has provided personal protective equipment to the workers based on their scope of work. PPE issuance record was made available to the audit team. Latest record sighted on 20.06.2021 for Mr Ikram. e. Estate has established safe working procedure for chemical handling. This procedure provides guidelines for receiving & storage of chemical, dispenses of chemical from store to mixing area, chemical delivery to field, cleaning spraying equipment and scheduled waste disposal. CHRA assessment has been conducted on 08.05.2019. Refer JKPP HIE 127/171-2(20). Action has been taken as per assessor recommendation. f. The estate management has appointed Mr Theban Rao A/L Ganesan as the MSPO Committee Safety & Health Officer, dated on 16.06.2021. g. First meeting for OSH committee was conducted on 25.01.2021, chaired by Mr. Chin Yin Lum (estate manager) and attended by 18 participants from various workstation. Verified 2020 OSH meeting has been conducted as per requirement. h. Procedure for emergency response and accident was communicated to the employees thru training and morning briefing. Sighted evidence of ERT Training dated 17.04.2021. i. First aid training was conducted by the estate management on 17.04.2021 which involve 6 workers from different workstation. The training was delivered by the hospital attendance. Sighted evidence of monthly inspection of first aid box has been done by hospital attendance as per document First Aid Box Usage List and First aid 	

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Box Monthly Check Up 2021 for the month of April, May, and June 2021. 20 items have been listed for 1 unit First Aid Box content. Interview for First aider found have good awareness and all items checked through video conference found in order.</p> <p>j. Records of all accidents had been well kept by the estate management. Sighted evidence of JKKP 6 report dated 02.06.2021. Sighted the JKKP6 and JKPP8 form prepared by the estate management.</p>	
Criterion 4.4.5: Employment conditions			
4.4.5.1	<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>- Major compliance -</p>	<p>The Social and Human Rights Policy is available in the office notice board signed by Mr. Goh Wei Lei, Executive Chairman dated 02/01/2019. The methods used to communicate the policy are by briefing during muster call and display at notice boards.</p>	Complied
4.4.5.2	<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>- Major compliance -</p>	<p>The Social and Human Rights Policy is available in the office notice board signed by Mr. Goh Wei Lei, Executive Chairman dated 02/01/2019.</p> <p>It is stated that the company will 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. Based on the interview with the workers, there has been no experience of any form of discrimination.</p>	Complied
4.4.5.3	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p>	<p>For local, a standard format of appointment letter is available (version 2. 01/19). For foreign workers, employment contract (version 1. 01/19) is used. Based on the agreements, it was noted that the employees' pay, and conditions meet legal or industry minimum standards.</p>	Complied

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	- Major compliance -		
4.4.5.4	<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>- Minor compliance -</p>	<p>The mechanism to ensure that the contractor’s overtime and working on rest were paid accordingly is by obtaining the pay slip of the workers from the contractor. Based on verification of pay slips of several contractors at all the sampled estates, the pay slip for contractor workers has the information about overtime, work on rest day or public holiday, unpaid leave, annual leave, etc. The pay was also found to be in accordance to minimum standards.</p>	Complied
4.4.5.5	<p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>Lists of workers and staff were available at all the sampled estates. The list consists the information about name, gender, DOB, IC/Passport No., passport expiry date, work permit expiry date, designation and date of join.</p>	Complied
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>The employment contract is available and signed by both employee and employer. All the sampled employment contracts and appointment letters were signed by the employees.</p> <p>Nonetheless, based on the terms of the contract of service stipulated in the employment contract for foreign workers, there is no provision for workers to submit the “notice of termination of contract” should they choose to end their service. This is not in-line with Section 12 (2) of the Employment Act 1955. Thus, a non-conformity report was assigned due to this lapse.</p>	Minor Non-conformity
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p>	<p>Pocket check roll or punch card is used to record the working days and overtime of all workers. Verification of the check roll confirm that the working days and overtime is tally with the payslips.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.4.5.8	The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement. - Major compliance -	The break time is stated in employment contract i.e. 1100-1130 & 1130-1200 hr of 0700-1500 working hours. Verification of payslips and time recording system (punch card) showed that the overtimes were paid accordingly.	Complied
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	Based on verification of sampled payslips, wages and overtime were found to be paid according to the Malaysian Employment Act and employment contract.	Complied
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions. - Minor compliance -	Other form of social benefits as sighted in the pay slip including company's contributions of EPF, SOCSO and EIS. Medical care and health provisions also provided for entire work force.	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 in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation. - Major compliance -	The workers are provided with free housing and water supply. Weekly inspection is done, and reports were available for verification. At GME, there are two line-sites available. Electricity is supplied by national grid and the bill is borne (with government approval) by the workers themselves for one of the line-sites. The other line-site, electricity is supplied from generators. This line-site also will be provided with a water treatment plant by December 2021 which can be seen in their approved 2021 capex budget. For the time being, drinking water is transported from the WTP at the mill using water bowser. At JE, the workers are provided with potable water sourced from public domain.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		At KE (Div A), electricity and potable water are supplied by Keratong Estate POM for free of charge.	
4.4.5.12	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	Policy established as Social and Human Rights Policy; Signed by Executive Chairman (Goh Wei Lei); Date: 02/01/2019. Stated to provide workplace free of violence and sexual harassment whether directly or indirectly against all employees and stakeholders. Also referred to the Definition of Sexual Harassment; Ver. Control: 1.00; Date: 29/8/2018; Rev. -; Source: ILO. To-date, there have been no report related to sexual harassment or violence. There has been no complain with regards to sexual harassment so far at all the sampled estates.	Complied
4.4.5.13	The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. - Major compliance -	There is no restriction of worker to form any trade union or workers committee. Nonetheless, there is no trade union in any of the visited estates.	Complied
4.4.5.14	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. - Major compliance -	Established as Social and Human Rights Policy; Signed by Executive Chairman (Goh Wei Lei); Date: 02/01/2019. Stated 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 the employee master lists at all the visited estates, there was no evidence that children or young persons have been recruited.	Complied

Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.4.6: Training and competency			
4.4.6.1	All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept. - Major compliance -	The management of both estates had planned and established annual training program for their workers which to be carried out for year 2021. The training includes the safety & health, environment, SOP and new information or techniques.	Complied
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description. - Major compliance -	Training need analysis was developed to suit each employee based on their job scope and workstation. From this analysis, the training program will be generated. Refer Training need analysis for Keratong Estate dated 10.04.2021 prepared and reviewed by Mr Chin Yin Lum.	Complied
4.4.6.3	A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure. - Minor compliance -	Continuous training program has been scheduled for all employees to ensure they will be trained within their job scope and responsibility. Sighted the training records made to the employees. Refer Annual Training Calendar / Planner MSPO-P4-C6 for the year of 2021 prepared by Ng Wei Siang dated 16.02.2021.	Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. - Major compliance -	The company has developed the group environment policy dated on 02.01.2019, endorsed by Mr. Goh Wei Lei (executive chairman). The company committed in protecting environment and ensure necessary effort to reduce the impact on the environment from its estates and mills	Complied

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Criterion / Indicator		Assessment Findings	Compliance																		
		<p>operations in line with the Environmental Quality Act 1974 and other applicable laws and regulations.</p> <p>Gua Musang Estate has conducted a briefing regarding on the MSPO policy to the workforce on 16.03.2021, delivered by Mr. Shaeh Jiann Haur (mill engineer) and attended by 43 workers.</p> <p>Jemima & Sg. Sendayan Estates has communicated their environment policy to the workers on 08.01.2021, delivered by Mr. Ja'far Nayan (assistant manager). Attended by 117 workers including staffs and executives.</p> <p>Keratong Estate has communicated their environment policy to the workers on 27.05.2021, delivered by Mr. Joseph Yeow (Cadet Planter). Attended by 44 workers including staffs and executives.</p>																			
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <ul style="list-style-type: none"> a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations. <p>- Major compliance -</p>	<p>Environmental management plan was developed as per guided MSPO Procedure: Environmental Management Plan, rev: 0, dated on 02.01.2019.</p> <p>Some of the aspect and impact of the operations listed are as below:</p> <table border="1"> <thead> <tr> <th>No</th> <th>Aspect</th> <th>Impact</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Use of petrochemical for transportation</td> <td>Soil and water pollution.</td> </tr> <tr> <td>2</td> <td>Domestic waste from line site and office</td> <td>Soil and water pollution</td> </tr> <tr> <td>3</td> <td>Scheduled waste generation and spillage</td> <td>Soil and water pollution</td> </tr> <tr> <td>4</td> <td>Transportation FFB to mill</td> <td>Air and noise pollution</td> </tr> <tr> <td>5</td> <td>Emission of GHG from nitrogen usage</td> <td>Air pollution (global warming)</td> </tr> </tbody> </table>	No	Aspect	Impact	1	Use of petrochemical for transportation	Soil and water pollution.	2	Domestic waste from line site and office	Soil and water pollution	3	Scheduled waste generation and spillage	Soil and water pollution	4	Transportation FFB to mill	Air and noise pollution	5	Emission of GHG from nitrogen usage	Air pollution (global warming)	Complied
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Criterion / Indicator		Assessment Findings	Compliance
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored. - Major compliance -	The plan to mitigate the negative impact has been included in the environmental management plan. The EMP was made available and verified.	Complied
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Programs to promote positive impacts has been included in the continual improvement plan. Sighted and verified. Sighted EFB Application to the field was recorded for Keratong Estate. Refer document Transporting Empty Bunches for the month of April 2021.	Complied
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives. - Major compliance -	Training and briefing were conducted on regular basis. Sighted a training programmed by the mill management to the mill workers, which involved MSPO policy, environmental management plan, environmental impact & assessment, and scheduled waste management & handling. Sighted document at Keratong Estate, Training on Chemical spillage has been conducted on 29.05.2021.	Complied
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	<u>Gua Musang Estate</u> First meeting for environment was conducted on 22.02.2021, chaired by Mr. Lee Khen Siang and attended by 13 participants. The minute was prepared by Siti Aisyah Abd Rahman as the EPMC secretary and approved by Mr. Shaeh Jiang Haur, the EPMC chairman. Among the agenda discussed were: a. Possibility of oil leakage at the oil dispatch station. b. Scheduled Waste for laboratory were in order and not yet due for disposal. c. Training on the environment for the workers	Complied

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Criterion / Indicator		Assessment Findings	Compliance															
		<p><u>Jemima & Sg. Sendayan Estates</u></p> <p>The estate conducted environment meeting on 30.03.2021, chaired by Mr. Lim Etock and attended by MSPO Committee Members (12 participants). Among the agenda discussed during the meeting were:</p> <ol style="list-style-type: none"> a. Verification on the previous meeting minutes. b. Previous issues. c. Current issues. <p><u>Keratong Estate</u></p> <p>The estate conducted environment meeting on 12.04.2021, chaired by Mr Chin Yin Lum and attended by MSPO Committee Members (18 participants). Among the agenda discussed during the meeting were:</p> <ol style="list-style-type: none"> a. Welcoming note from manager b. Safety Briefing c. Request and response d. Closing 																
Criterion 4.5.2: Efficiency of energy use and use of renewable energy																		
4.5.2.1	<p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within 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>- Major compliance -</p>	<p>2021 Baseline summary (as at April 2021) for non-renewable energy sources consumption was made available to the audit team.</p> <p><u>Gua Musang Estate</u></p> <p>Record for 2021 diesel usage are as follow:</p> <table border="1"> <thead> <tr> <th>Diesel</th> <th>Jan</th> <th>Feb</th> <th>Mar</th> <th>Apr</th> </tr> </thead> <tbody> <tr> <td>Diesel</td> <td>4259</td> <td>3983</td> <td>4445</td> <td>4546</td> </tr> <tr> <td>FFB Produced (Mt)</td> <td>3852.87</td> <td>2942.03</td> <td>4417.68</td> <td>4742.90</td> </tr> </tbody> </table>	Diesel	Jan	Feb	Mar	Apr	Diesel	4259	3983	4445	4546	FFB Produced (Mt)	3852.87	2942.03	4417.68	4742.90	Complied
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4.5.2.2	<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>- Major compliance -</p>	<p><u>Gua Musang Estate</u> Electric supply was budgeted at RM35,700 for year 2021 while the diesel is budgeted at RM74,400</p> <p><u>Jemima & Sg. Sendayan Estates</u> Electric supply was budgeted at RM110,000 for year 2021 while the diesel is budgeted at RM72,000.</p> <p><u>Keratong Estate</u> Electric supply was budgeted at RM197,306 for year 2021 while the diesel is budgeted at RM67,492.</p>					Complied																																								

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4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	Not applicable. The estate using TNB as the electric supply for resident and office operation.	Not applicable																																	
Criterion 4.5.3: Waste management and disposal																																				
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	<p><u>Gua Musang Estate</u> The estate management has established the waste management plan (shared between estate and mill) for year 2021. The plan has identified EFB, dust, effluent and fertilizer bags as the waste generated from the work station.</p> <p><u>Jemima & Sq. Sendayan Estates</u> The estate has identified and listed the source of waste and potential pollution to the environment, prepared by Mr. Mohamad Ezham Norizwan dated on 05.04.2021. The lists are as follow:</p> <table border="1"> <thead> <tr> <th colspan="3">Domestic Waste</th> </tr> <tr> <th>Waste</th> <th>Source</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Plastic</td> <td>Office, line site</td> <td>Plastic bottle, food packaging, plastic bags.</td> </tr> <tr> <td>Paper</td> <td>Office, line site</td> <td>Paper based packaging</td> </tr> <tr> <td>Glass</td> <td>Office, line site</td> <td>Drinking bottle, window glass</td> </tr> <tr> <td>Rags</td> <td>Office, line site</td> <td>Old cloths</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="3">Scheduled Waste</th> </tr> <tr> <th>Waste</th> <th>SW Code</th> <th>Source</th> </tr> </thead> <tbody> <tr> <td>Tube Lamp</td> <td>SW110</td> <td>Workshop & line site</td> </tr> <tr> <td>Syringe and needles</td> <td>SW404</td> <td>Clinic</td> </tr> <tr> <td>Used PPE</td> <td>SW410</td> <td>Store</td> </tr> </tbody> </table>	Domestic Waste			Waste	Source	Remarks	Plastic	Office, line site	Plastic bottle, food packaging, plastic bags.	Paper	Office, line site	Paper based packaging	Glass	Office, line site	Drinking bottle, window glass	Rags	Office, line site	Old cloths	Scheduled Waste			Waste	SW Code	Source	Tube Lamp	SW110	Workshop & line site	Syringe and needles	SW404	Clinic	Used PPE	SW410	Store	Complied
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		<p><u>Keratong Estate:</u> The estate management has established the waste management plan (shared between estate and mill) for year 2021. The plan has identified EFB, dust, effluent and fertilizer bags as the waste generated from the workstation. Refer MSPO-P5-C3.</p>																					
4.5.3.2	<p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <p>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</p> <p>- Major compliance -</p>	<p>The waste management plan was made available to the audit team. Identifying and monitoring of the waste were included inside the plan. Sighted as follow:</p> <p>a. Spent lubricant oil: to dispose thru Kualiti Alam. b. Plastic bags: to educate workers not to using plastic and substitute with cloth bags. c. Used papers: to reuse if possible.</p>	Complied																				
4.5.3.3	<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>- Major compliance -</p>	<p>The company has established Waste Management Procedure, ref no: MSPO-P5-C3, rev: 00, dated on 01.0.2018. scheduled waste management was included under this procedure which involved the identification of SW, collection and storage of SW and disposal of SW.</p> <p>For Keratong Estate, sighted evidence of Notification of generation of Scheduled waste for the month of April, May, and June 2021. Refer record as reference number ASCR31/152/000/033 for Keratong Estate. Record as below:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Date</th> <th>SW305</th> <th>SW410</th> <th>SW422</th> </tr> </thead> <tbody> <tr> <td>April 21</td> <td>24.04.2021</td> <td>0.3820</td> <td>0.0320</td> <td>0.0120</td> </tr> <tr> <td>May 21</td> <td>31.05.2021</td> <td>0.2010</td> <td>0.0210</td> <td>0.0000</td> </tr> <tr> <td>June 21</td> <td>25.06.2021</td> <td>0.1820</td> <td>0.0310</td> <td>0.0240</td> </tr> </tbody> </table>	Month	Date	SW305	SW410	SW422	April 21	24.04.2021	0.3820	0.0320	0.0120	May 21	31.05.2021	0.2010	0.0210	0.0000	June 21	25.06.2021	0.1820	0.0310	0.0240	Complied
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		Disposal for Scheduled Waste has been conducted on 26.04.2021 by Kualiti Alam Sdn Bhd. Refer Consignment note: 20210426112HVOIAE. There is no SW306 generated as per checking. Verified through interview document checking.																					
4.5.3.4	<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>- Major compliance -</p>	<p>The Scheduled Waste was disposed thru the licensed contractors, Pentas Flora (Kelantan) Sdn Bhd. Latest disposal was done on 20.05.2021 for SW 409 (empty lubricant drum), SW410 (used contaminated rags) and SW322 (spent hexane).</p> <p>For Keratong Estate, sighted evidence of Notification of generation of Scheduled Waste for the month of April, May, and June 2021. Refer record as reference number ASCR31/152/000/033 for Keratong Estate. Record as below:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Date</th> <th>SW305</th> <th>SW410</th> <th>SW422</th> </tr> </thead> <tbody> <tr> <td>April 21</td> <td>24.04.2021</td> <td>0.3820</td> <td>0.0320</td> <td>0.0120</td> </tr> <tr> <td>May 21</td> <td>31.05.2021</td> <td>0.2010</td> <td>0.0210</td> <td>0.0000</td> </tr> <tr> <td>June 21</td> <td>25.06.2021</td> <td>0.1820</td> <td>0.0310</td> <td>0.0240</td> </tr> </tbody> </table> <p>Disposal for Scheduled Waste has been conducted on 26.04.2021 by Kualiti Alam Sdn Bhd. Refer Consignment note: 20210426112HVOIAE.</p>	Month	Date	SW305	SW410	SW422	April 21	24.04.2021	0.3820	0.0320	0.0120	May 21	31.05.2021	0.2010	0.0210	0.0000	June 21	25.06.2021	0.1820	0.0310	0.0240	Complied
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4.5.3.5	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p>- Minor compliance -</p>	<p>Domestic waste disposed thru the Gua Musang Municipal Council dump site.</p> <p>For Jemima & Sg. Sendayan Estates, domestic waste disposed thru licensed contractor UER Resources Sdn Bhd.</p> <p>For Keratong Estate, domestic waste disposed thru landfill. Sighted record of rubbish collection and schedule.</p>	Complied																				
Criterion 4.5.4: Reduction of pollution and emission																							

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Criterion / Indicator		Assessment Findings				Compliance
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	The estate has conducted an assessment on polluting activities. Sighted the sample as below:				Complied
		No	Source of GHG	Env Impact	Mitigation	
		1	Emission of GHG from nitrogen fertilizer usage	Global warming	To follow recommendation from agronomist.	
		2	Emission from electrical supply	Air pollution	Ensure regular maintenance	
		3	Emission from agricultural vehicle	Air pollution	To switch off engine if idle more than 10 minutes,	
4	Open burning of domestic waste and replanting	Air pollution	Enforce no open burning policy.			
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	<p>The action plan to reduce identified significant pollutants and emissions was established and detailed under the indicator 4.5.4.1.</p> <p>Sighted the report from visiting agronomist, Palm Status, Crop Production, Leaf & Soil Nutrient Status and 2021 Fertilizer Recommendation for Ladang Gua Musang, Kelantan, received by the estate on 04.10.2020.</p> <p>Sighted GHG Management Plan for Keratong Estate has been prepared by Ng Wei Siang and approved by Mr Chin Yin Lum dated 09.03.2021. There is 6 sources of GHG were discussed in the assessment.</p>				Complied
Criterion 4.5.5: Natural water resources						
4.5.5.1	The management shall establish a water management plan to maintain the quality and availability of natural water resources	<u>Gua Musang Estate</u>				Complied

Criterion / Indicator	Assessment Findings	Compliance																																								
<p>(surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities. 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.). 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. e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented. f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually. <p>- Major compliance -</p>	<p>The estate has established water management plan, prepared by Mr. Shaeh Jiann Haur. Sighted the plan as follow:</p> <table border="1" data-bbox="1070 502 1906 703"> <thead> <tr> <th>Management Action</th> <th>Period</th> </tr> </thead> <tbody> <tr> <td>Water quality analysis</td> <td>Annually</td> </tr> <tr> <td>Analysis of incoming and outgoing water quality</td> <td>Annually</td> </tr> <tr> <td>Continue training for sprayers to minimise the accident case of overspray</td> <td>Twice a year training for the sprayers.</td> </tr> </tbody> </table> <p>The water consumption comes from the treated water from Sungai Ketil. According to their water management plan, water analysis to be conducted once a year. Sighted the latest water sampling results conducted on 02.11.2020, analysed by Jabatan Kimia Malaysia Cawangan Kelantan.</p> <p>Water sampling results:</p> <table border="1" data-bbox="1070 1002 1899 1273"> <thead> <tr> <th>No</th> <th>Parameters</th> <th>Inlet Sg Ketil</th> <th>Outlet Sg Ketil</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH</td> <td>6.84</td> <td>7.2</td> </tr> <tr> <td>2</td> <td>N</td> <td>0.0341</td> <td>0.0508</td> </tr> <tr> <td>3</td> <td>BOD</td> <td>2.55</td> <td>3.80</td> </tr> <tr> <td>4</td> <td>COD</td> <td>20.3</td> <td>17.2</td> </tr> <tr> <td>5</td> <td>Dissolve oxygen</td> <td>7.91</td> <td>7.15</td> </tr> <tr> <td>6</td> <td>TSS</td> <td>>2</td> <td>>2</td> </tr> <tr> <td>7</td> <td>Water Quality Index</td> <td>93 class I</td> <td>91 class II</td> </tr> </tbody> </table> <p>No well was used as water supply in the estate.</p>	Management Action	Period	Water quality analysis	Annually	Analysis of incoming and outgoing water quality	Annually	Continue training for sprayers to minimise the accident case of overspray	Twice a year training for the sprayers.	No	Parameters	Inlet Sg Ketil	Outlet Sg Ketil	1	pH	6.84	7.2	2	N	0.0341	0.0508	3	BOD	2.55	3.80	4	COD	20.3	17.2	5	Dissolve oxygen	7.91	7.15	6	TSS	>2	>2	7	Water Quality Index	93 class I	91 class II	
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Criterion / Indicator		Assessment Findings	Compliance
		<p><u>Jemima & Sq. Sendayan Estates</u></p> <p>Water supply for domestic use comes from local authority in Negeri Sembilan (SAINS). Water usage record for 2019, 2020 and 2021 (as at April) are 52,460 m3, 46020 m3 and 25,320 m3 respectively.</p> <p>Monitoring of outgoing water is conducted twice a year based on the estate water management plan. 3 water samplings were sent to Airwastewater Management Sdn Bhd and the result obtained on 14.04.2021.</p> <p>Based on the result, it was declared as under Class II and classified as clean.</p> <p><u>Keratong Estate</u></p> <p>The water consumption comes from the treated water from Sungai Cabang Kanan, other than that verified that availability of Sungai Jeram, Sungai Kabung and Sungai Kelebang surrounding the estate. Refer document identification of water source dated 21.01.2021 including 4 sample point. According to their water management plan, water analysis to be conducted once a year. Sighted the latest water sampling results conducted on 28.04.2021, analysed by NALCO Water. Refer Sampling Report point number 11A/21, 10D/21, 09P/21, 09N/21, and 09J/L/21. All result showed according to parameters.</p> <p>Sighted water management plan has been established on 09.03.2021 by Ng Wei Siang. Refer MSPO-P5-C5.</p>	
<p>4.5.5.2</p>	<p>No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p>- Minor compliance -</p>	<p>Not applicable since not implemented in the estate compound.</p> <p>Based on interview and verification through photos at Keratong Estate, there is no construction of bunds, weirs and dams across main rivers or</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
		waterways passing through an estate.	
4.5.5.3	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles). - Minor compliance -	Estate practice silt pit and roadside drain for water harvesting.	Complied
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value			
4.5.6.1	Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover: a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. b) Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities. - Major compliance -	The company has established a procedure regarding on the status of rare, threatened, or endangered species & high biodiversity value area, ref no: MSPO-P5-C6, dated on 26.08.2018. The objective of this procedure is to provide necessary guidance on steps of identification of high biodiversity value, conservation status on legal protection and mitigation for protection of RTE species. <u>Gua Musang Estate</u> Identification of high biodiversity value was prepared by Mr. Mohamad Khairul Anwar (environment office), and approved by Mr. Lee Khen Siang (Senior Assistant Manager) on April 2021. The following animal species was identified in the estate compound; "memerang kecil", "kucing hutan", "ungka tangan putih", "musang jebat" and " badak cipan". <u>Keratong Estate</u> Identification of high biodiversity value for Jemima & Sg. Sendayan Estates was prepared by Mr. Joseph Yeow Kim Wah and approved by Mr.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Chin Yin Lum (estate manager) on 25.03.2021. Refer MSPO-P5-C6 Identification of High Biodiversity Value (HBV) Habitat Area.	
4.5.6.2	<p>If rare, threatened or endangered species or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>a) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p>- Major compliance -</p>	<p>According to the biodiversity management plan 2021, if there is any RTE species were spotted, the area where the species sighted will be marked in the map signage will be erected. Monitoring inspection will be executed and recorded.</p> <p>Signage of discouraging illegal hunting erected in the estate compound and the workers are made aware of this situation.</p>	Complied
4.5.6.3	<p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p>- Major compliance -</p>	<p>A management plan was developed, established, and implemented. Document relating to the above was available.</p>	Complied
Criterion 4.5.7: Zero burning practices			
4.5.7.1	<p>Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice.</p> <p>- Major compliance -</p>	<p>There is no replanting program for Keratong estate since all palm age below than 25 years. Oldest palm planted on 2004 and the youngest palm planted on 2012.</p>	Not applicable
4.5.7.2	<p>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.</p> <p>- Major compliance -</p>	<p>No areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop.</p>	Not applicable

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Criterion / Indicator		Assessment Findings	Compliance
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. - Major compliance -	No controlled burning carried out.	Not applicable
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	There is no replanting program for Keratong estate since all palm age below than 25 years. Oldest palm planted on 2004 and the youngest palm planted on 2012. The previous crop were felled or mowed down, chipped and shredded and windrowed.	Complied
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	The company has a standard operation procedure, Guidelines on Good Agriculture Practices, dated on 01.01.2019. the SOP covers the following operations: a. Introduction to good agriculture practices b. Replanting c. Manuring d. Harvesting e. Pest & diseases f. Others The operations were monitored by program sheets, muster chits, harvesting round records, stock sheets, monthly progress reports and visits from agronomist, visiting executives from HQ or Chief Operating Officer.	Complied
4.6.1.2	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to	The estate management has established related SOP for oil palms grown on permitted levels on sloping land, SOP: Terrace & Platform	Complied

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Criterion / Indicator		Assessment Findings	Compliance												
	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. - Major compliance -	Construction, GAP-1. This SOP provides guidelines if the oil palm planted on a slope exceeding 15 degree.													
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	Visual identification for block marking has the information below: a. Block no b. Year planted c. Ha.	Complied												
Criterion 4.6.2: Economic and financial viability plan															
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	Business management plan for all estates were made available and reviewed. Attention was given to the crop projection, cost of production and capex expenditure. Performances are discussed in the monthly meeting held at the estate office.	Complied												
4.6.2.2	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years. - Major compliance -	Gua Musang Estate has established long term replanting program. Sighted as below: <table border="1" style="margin-left: 20px;"> <tr> <td>Year</td> <td>2021</td> <td>2022</td> <td>2023</td> <td>2024</td> <td>2025</td> </tr> <tr> <td>Ha</td> <td>135</td> <td>171</td> <td>149</td> <td>172</td> <td>159</td> </tr> </table> <p>Jemima & Sg. Sendayan Estates did not have any replanting program until year 2029.</p> <p>There is no replanting program for Keratong Estate (Division A) since all palm age below than 25 years. Oldest palm planted on 2004 and the youngest palm planted on 2012.</p>	Year	2021	2022	2023	2024	2025	Ha	135	171	149	172	159	Complied
Year	2021	2022	2023	2024	2025										
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Criterion / Indicator		Assessment Findings	Compliance
4.6.2.3	<p>The business or management plan may contain:</p> <ul style="list-style-type: none"> a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production: cost per tonne of FFB d) Price forecast e) Financial indicators: cost benefit, discounted cash flow, return on investment <p>- Major compliance -</p>	<p>Documented business plan or budget was made available to the audit team. Attention was given to the crop projection, cost of production and cost per ton & ha.</p>	Complied
4.6.2.4	<p>The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.</p> <p>- Major compliance -</p>	<p>Implementation of the management plan was regularly monitored thru monthly progress report, monthly meetings and visits from agronomist, executives from HQ and Chief Operating Officer.</p>	Complied
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p>- Major compliance -</p>	<p>Pricing mechanism is guided by CTP Policies Manual, Feb 2006, Chapter 6.0 Procurement, Ver. 1.0.</p>	Complied
4.6.3.2	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p>- Major compliance -</p>	<p>All the appointed contractors have signed their respective contract agreements with CTP. Based on sampled vouchers, the payments were made in timely manner.</p>	Complied
Criterion 4.6.4: Contractor			
4.6.4.1	<p>Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and</p>	<p>The contractors were made to understand the MSPO requirements through stakeholders meeting. Records of meetings were maintained for verification. The latest stakeholders meetings were conducted on</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	information. - Major compliance -	22/03/2021 (GME POM and GME), 26/03/2021 (JE – via email due to MCO) and 26/04/2021 (KE POM and KE – via email due to MCO).	
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Copies of the signed contract agreement were available for verification. Among the contractors sampled were Ali B. Che Mat, Ong Utama, Mohd. Saiful Basri, Soon Lee Earthworks, Kim Chuan Oil Palm Trading and Pang Chee Min.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	There is no objection by the management to accept MSPO approved auditors to verify the assessments through a physical inspection, if required.	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. - Major compliance -	The observance established as Control Points for Contractors; Doc. # MSPO-P6-C4; 11/01/2019 which includes the following: - Work performance parameters - Compliance to safety and health standards - Compliance with laws/statutes/regulations - MSPO requirements	Complied
4.7 Principle 7: Development of new planting			
Criterion 4.7.1: High biodiversity value			
4.7.1.1	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation. - Major compliance -	NA as no new development for oil palm plantations at Keratong Estate, Gua Musang Estate and Jemima & Sg. Sendayan Estates.	Not applicable
4.7.1.2	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia’s National Physical	NA as no new development for oil palm plantations at Keratong Estate, Gua Musang Estate and Jemima & Sg. Sendayan Estates.	Not applicable

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Criterion / Indicator		Assessment Findings	Compliance
	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 -		
Criterion 4.7.2: Peat Land			
4.7.2.1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - Major compliance -	NA as no new development for oil palm plantations at Keratong Estate, Gua Musang Estate and Jemima & Sg. Sendayan Estates.	Not applicable
Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)			
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. - Major compliance -	NA as no new development for oil palm plantations at Keratong Estate, Gua Musang Estate and Jemima & Sg. Sendayan Estates.	Not applicable
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. - Major compliance -	NA as no new development for oil palm plantations at Keratong Estate, Gua Musang Estate and Jemima & Sg. Sendayan Estates.	Not applicable
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed.	NA as no new development for oil palm plantations at Keratong Estate, Gua Musang Estate and Jemima & Sg. Sendayan Estates.	Not applicable

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	- Major compliance -		
4.7.3.4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. - Minor compliance -	NA as no new development for oil palm plantations at Keratong Estate, Gua Musang Estate and Jemima & Sg. Sendayan Estates.	Not applicable
Criterion 4.7.4: Soil and topographic information			
4.7.4.1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. - Major compliance -	NA as no new development for oil palm plantations at Keratong Estate, Gua Musang Estate and Jemima & Sg. Sendayan Estates.	Not applicable
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - Major compliance -	NA as no new development for oil palm plantations at Keratong Estate, Gua Musang Estate and Jemima & Sg. Sendayan Estates.	Not applicable
Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils			
4.7.5.1	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - Major compliance -	NA as no new development for oil palm plantations at Keratong Estate, Gua Musang Estate and Jemima & Sg. Sendayan Estates.	Not applicable
4.7.5.2	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation.	NA as no new development for oil palm plantations at Keratong Estate, Gua Musang Estate and Jemima & Sg. Sendayan Estates.	Not applicable

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	NA as no new development for oil palm plantations at Keratong Estate, Gua Musang Estate and Jemima & Sg. Sendayan Estates.	Not applicable
Criterion 4.7.6: Customary land			
4.7.6.1	No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. - Major compliance -	NA as no new development for oil palm plantations at Keratong Estate, Gua Musang Estate and Jemima & Sg. Sendayan Estates.	Not applicable
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	NA as no new development for oil palm plantations at Keratong Estate, Gua Musang Estate and Jemima & Sg. Sendayan 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. - Major compliance -	NA as no new development for oil palm plantations at Keratong Estate, Gua Musang Estate and Jemima & Sg. Sendayan 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.	NA as no new development for oil palm plantations at Keratong Estate, Gua Musang Estate and Jemima & Sg. Sendayan Estates.	Not applicable

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	NA as no new development for oil palm plantations at Keratong Estate, Gua Musang Estate and Jemima & Sg. Sendayan 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. - Major compliance -	NA as no new development for oil palm plantations at Keratong Estate, Gua Musang Estate and Jemima & Sg. Sendayan Estates.	Not applicable
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance -	NA as no new development for oil palm plantations at Keratong Estate, Gua Musang Estate and Jemima & Sg. Sendayan Estates.	Not applicable
4.7.6.8	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. - Minor compliance -	NA as no new development for oil palm plantations at Keratong Estate, Gua Musang Estate and Jemima & Sg. Sendayan Estates.	Not applicable

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

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	Policy for the implementation of MSPO shall be established. - Major compliance -	CTP has established its various policies to drive the organization towards the implementation of MSPO. Among the policies are: - Sustainability Policy - Environmental Policy - Social and Human Rights Policy - Occupational Safety and Health Policy	Complied
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - Major compliance -	The statement about the organisation shall continuously review and improve operations with respect to social, environmental and economic sustainability, guided by the principles of MSPO and best practice is emphasized in the Sustainability Policy.	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Internal audit implemented based on MSPO Internal Audit Procedure; Doc. # MSPO-P1-C2, ver. 1.00, dated 26/08/2018, rev. 1.02, dated 01/03/2021. Latest internal audits were conducted on the following dates: GME POM & GME 04-06/05/2021 – no NCR JE: 01-02/04/2021 – 1 NCR KE: 21/04/2021 – no NCR	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	Internal audit procedure is documented in MSPO Internal Audit Procedure; Doc. # MSPO-P1-C2, ver. 1.00, dated 26/08/2018, rev. 1.02, dated 01/03/2021. Root cause is identified and stated in the NCR form to implement the necessary corrective action.	Complied
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	Internal audit reports for all the assessed operating units were available for verification. The results of the internal audit were also part of the management review agenda.	Complied
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	The management review procedure referred to Ref no.: MSPO-02 dated 01/07/2018. The management reviews were conducted on 25/05/2021 (GME POM & GME) and 24/05/2021 (KE POM). Based on minutes, agenda is in accordance to MR review procedure.	Complied
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. - Major compliance -	The continual improvement plan for the mill has been made available and reviewed. Sighted the plan as follows: a. The installation of Air Pollution Control System (APCS) has achieved 70%. b. To install Continuous Emission Monitoring System (CEMS) for particulate matter. c. To construct new aerobic ponds to increase the retention time of the treatment plant and improve quality of final discharge.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. - Major compliance -	The mill management has established a training program on yearly basis to disseminate new information to the work force. Any new training on new product or information will be slotted in the training program whenever necessary. Sighted evidence of Management Review on Continuous Improvement Plan for Keratong Estate POM.	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms. - Major compliance -	Communication implementation were based on procedure title: Stakeholder Communication & Consultation Procedure, MSPO-P2-C2, ver. 1.00, rev. 1.02, dated 08/05/2019. Stakeholders records will use the following: - Stakeholders List (Appendix 1) - Stakeholders Concerns and Resolution Matrix (Appendix 2) - Grievances/Complaints Form (Appendix 3) - Information Request Form – MSPO Related (Appendix 4) Records of communication available at individual operating units audited.	Complied
4.2.1.2	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. - Major compliance -	Management has made the documents public as per List of Public Documents available for MSPO Stakeholder Inspection, Doc No: MSPO-P2-C1 Version Control 1 dated 01 January 2019. Among the public document shared are: 1. All MSPO policies and licenses 2. Safety and health plan	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		3. Plans and impact assessment relating to social impact 4. Plans and impact assessment relating to environmental impact and pollution prevention plan 5. Records of complaints and grievances 6. Continual improvement plan	
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	Implementation and consultation with relevant stakeholders is based on procedure title: Stakeholder Communication & Consultation Procedure, MSPO-P2-C2, ver. 1.00, rev. 1.02, dated 08/05/2019.	Complied
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . - Minor compliance -	The Mill Engineers are the appointed PIC to handle any issues related to Indicator 1 (Clause 3 of the above procedure).	Complied
4.2.2.3	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. - Major compliance -	Stakeholder list for all the sampled mills were available from various background, which are surrounding communities, government agencies, contractors & suppliers, neighbouring estates, etc. The lists were updated from time to time whenever necessary. The last updates were on 13/01/2021 (GME & mill) and 05/02/2021 (KE and mill).	Complied
Criterion 4.2.3 – Traceability			
4.2.3.1	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. - Major compliance -	Chin Teck Plantations Bhd has established SOP for Traceability, dated on 26.08.2018, version no: 01 and revision no: 1.01. This SOP has detailed the work flow for tracing the origins of the FFB and the despatch of the CPO or PK.	Complied

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		Sighted the record of FFB received from Gua Musang Estate (grading chit, delivery note and weighbridge ticket). Sighted the record of FFB received from Keratong Estate (grading chit, delivery note and weighbridge ticket).																	
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	The mill management conducted series of inspection either on the daily basis or based on the visit from the Chief Engineer. 1. Visit from chief engineer, Mr. Lim Xin Yi, conducted on 30.03.2021 – 01.04.2021. The visit focus on the mill performance review, maintenance & management issues and CAPEX & high value OPEX implementation progress. 2. Internal audit assessment conducted on 04.05.2021. 3. Visiting report to Keratong Estate POM by Mr Ng Yeen Chern dated 26.12.2019.	Complied																
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system. - Minor compliance -	Gua Musang Estate POM management has appointed Ms. Nor Wahida Binti Deraman as the Transparency & Traceability Officer for MSPO Committee. The appointment was made on 01.01.2019. Keratong Estate POM has appointed Pn Farwahida Artika as the Transparency & Traceability Officer for MSPO Committee dated 01.01.2021.	Complied																
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel are properly maintained by the mill management. Keratong Estate POM CPO Despatch: <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Date</th> <th>28.05.21</th> <th>29.03.21</th> <th>30.05.21</th> </tr> </thead> <tbody> <tr> <td>Chit No.</td> <td>5579</td> <td>5415</td> <td>5580</td> </tr> <tr> <td>Lorry No.</td> <td>NCD9728</td> <td>NCE2826</td> <td>NBE9710</td> </tr> <tr> <td>Weight No.</td> <td>28.12 MT</td> <td>30.23 MT</td> <td>25.17 MT</td> </tr> </tbody> </table>	Date	28.05.21	29.03.21	30.05.21	Chit No.	5579	5415	5580	Lorry No.	NCD9728	NCE2826	NBE9710	Weight No.	28.12 MT	30.23 MT	25.17 MT	Complied
Date	28.05.21	29.03.21	30.05.21																
Chit No.	5579	5415	5580																
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Weight No.	28.12 MT	30.23 MT	25.17 MT																

Criterion / Indicator	Assessment Findings	Compliance	
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	<p>All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p>	<p>Licenses and permits were made available to the audit team. Sighted as follow:</p> <p><u>Gua Musang Estate POM</u></p> <ul style="list-style-type: none"> a. MPOB license for mill, 500017604000, expired on 31.03.2022. b. Mill effluent license no 004601, 30.06.2021. c. "Kelulusan Kerja Lebih Masa (130 jam)", BHG.PU/9/134 Jld 31(33), expired on 30.06.2021. d. Mill electric license no: 2020/01311, expired on 29.07.2021. e. "Permit Barang Kawalan Berjadual", ref no: KPDNKKK/GMG/UB/07/07/PA/67/16D, expired on 09.05.2022. f. "Lesen Bagi Perpasangan Persendirian", serial no:44294, license no: 2020/01311, expired on 28.07.2021. g. DOE License no: 004601, expired on 30.06.2021. <p><u>Keratong Estate POM</u></p> <ul style="list-style-type: none"> a. MPOB license for mill, 500067204000, Expiry date on 30.11.2021. b. Jadual Pematuhan DOE No: 004153. Expiry date on 30.06.2021 c. Mill electric license no: 2021/00294, Expiry date on 19.01.2022. d. "Permit Barang Kawalan Berjadual", ref no: PHG/RPN/017/82 SK(D), Expiry date on 16.08.2021. e. DOE License no: 005087, dated 11.11.2019 	<p>Complied</p>

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		f. DOE License no: 004153, dated 29.05.2014	
4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirements register. - Major compliance -	The mill has prepared the register of laws and list of relevant acts, laws and regulations, revised on 18.05.2021, doc no: MSPO-P3-C1, version no: 02. The register consists of Occupational Safety & Health act, environment, water and human resources. The mill management has updated their register by including the regulation related to the COVID-19 pandemic. a. Prevention & control of infectious diseases regulation 2020. b. Temporary measures for reducing the impact of coronavirus disease 2019 (COVID-19) Act 2020.	Complied
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	The mill management has updated their register by including the regulation related to the COVID-19 pandemic. Sighted the laws as follow: a. Prevention & control of infectious diseases regulation 2020. b. Temporary measures for reducing the impact of coronavirus disease 2019 (COVID-19) Act 2020.	Complied
4.3.1.4	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements. - Minor compliance -	Gua Musang Estate POM has appointed Ms. Nor Mazila Binti Sulaiman as the Legal Compliance Officer for MSPO Committee. The appointment was made on 01.01.2020. For Keratong Estate POM, Ms Noraseken Binti Ibrahim has appointed as the Legal Compliance Officer for MSPO Committee. The appointment was made on 01.01.2021.	Complied
Criterion 4.3.2 – Lands use rights			

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4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. - Major compliance -	The land titles for both mills are shared with Gua Musang Estate and Keratong Estate respectively. There is no evidence that the oil palm milling activities diminish the land use rights of other users.	Complied
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. - Major compliance -	The land titles for both mills are shared with Gua Musang Estate and Keratong Estate respectively.	Complied
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	The mills are respectively located in Gua Musang Estate and Keratong Estate. The mills' boundaries were demarcated with fences.	Complied
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 -	The land titles for both mills are shared with Gua Musang Estate and Keratong Estate respectively. Any land dispute will be handled by the estates' management.	Complied
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	NA as the land matters are under estates' management.	Not applicable
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	NA as the land matters are under estates' management.	Not applicable

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4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	NA as the land matters are under estates' management.	Not applicable
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	The assessment of Social Impact is guided by Social Impact Assessment (SIA) Procedure, MSPO-09, rev. 1.01, dated 30/08/2018. SIA were done by the estates by utilising a checklist during a stakeholder consultation meeting. The checklist was meant to collect information related to social impact evaluation. The last consultations were carried out on 20/03/2021 (GME POM) and 13/03/2021 (KE POM). The information was then transferred to Stakeholders Concerns and Resolution Matrix where action plans to resolve the concerns raised are documented. The estates found to have responded to the concerns effectively.	Complied
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	The system for dealing with complaints and grievances was established and documented in Grievance & Complaints Handling Procedure, MSPO-P4-C2, rev. 1.01, dated 08/05/2019.	Complied
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - Major compliance -	Based on the sampled complaints from the workers which were mostly on housing facility defects, the complaints were resolved on timely manner.	Complied

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4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - Minor compliance -	Governed under Grievance & Complaints Handling Procedure, MSPO-P4-C2, rev. 1.01, dated 08/05/2019. Ref.: Grievances/Complaints/Feedback Form. Mostly complaints received were on housing defects. Based on the complaint form records, all the issues were resolved within the timeframe defined in the procedure i.e. <14 days.	Complied
4.4.2.4	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. - Minor compliance -	The employees and the surrounding communities were made aware of the complaint procedure through stakeholders meeting and regular briefing. Based on interview, the sampled employees and stakeholders had sufficient awareness on the procedure.	Complied
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. - Major compliance -	Last 24 months recoded complaints and resolutions were still available as the following samples: GME POM: 07/04/2019 KE POM: 11/11/2019 (first complain)	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation. - Minor compliance -	Contributions to local development are shared with the estates. Refer to Indicator 4.4.3.1 of Part 3.	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and	Chin Teck Plantations Berhad has developed Occupational Safety & Health Policy, which was signed by Mr. Goh Wei Lei, Executive Chairman on 13.05.2019. The policy emphasis on the commitment of	Complied

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<p>Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>the company in complying with the OSH Act 1994, Factory & Machinery Act 1967 and other related applicable requirements.</p> <p>Safety briefing was conducted to the workers on 19.01.2021 by Mr. Shaifullah Bin Shaari (safety Supervisor). Attended by 62 workers.</p> <p>Series of safety procedure trainings were conducted based on their workstation:</p> <ul style="list-style-type: none"> a. Safe working procedure: Boiler station, conducted on 22.03.2021. b. Safe working procedure: Kernel Plant station, conducted on 25.02.2021. c. Safe working procedure: Workshop, conducted on 16.02.2021. d. Safe working procedure: Crane Handling, conducted on 28.01.2021. 	
<p>4.4.4.2 The occupational safety and health plan should cover the following:</p> <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> i. All employees involved are adequately trained on safe working practices; ii. All precautions attached to products should be properly observed and applied; d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as 	<p><u>Gua Musang Estate POM</u></p> <ul style="list-style-type: none"> a. Safety briefing was conducted to the workers on 19.01.2021 by Mr. Shaifullah Bin Shaari (Safety Supervisor). Attended by 62 workers. b. The HIRARC was made available to the audit team and reviewed. It was prepared by Mr. Mohamad Shaifullah Bin Shaari (safety supervisor) and approved by Mr. Lee Khen Shang (Senior Assistant Manager). The next review was scheduled on 2.10.2021. c. Training and briefing to the workers who exposed to the chemicals was conducted by the management. Latest training conducted on 13.02.2021. d. PPE issuance records were made available to the audit team. Sighted a record for workers from boiler station. 	<p>Complied</p>

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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 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>e. The mill management has established a safe working procedure in handling chemical. Some of the procedure's outlines are receiving & storage of chemical, chemical dispenses from store to mixing area and scheduled waste disposal.</p> <p>f. The mill has appointed Mr. Mohamad Saifullah Bin Shaari as the committee secretary for OSH Committee. The appointment was made on 02.01.2021.</p> <p>g. The OSH committee has conducted their first OSH meeting for year 2021 on 22.03.2021. The meeting was chaired by Mr Lee Khen Siang (Senior Assistant Manager). Among the agenda discussed during the meeting were verified the agenda from previous meeting, workstation inspection, training & briefing, information on accident or near miss accident and others. As for year 2020, the committee has conducted 4 meetings.</p> <p>h. Emergency response plan was made available to the audit team. Training records were sighted and verified.</p> <p>i. First aid training was conducted to the mill workers on 21.02.2021, attended by 14 participants. The training was conveyed by the Hospital Assistant, Mr. Chandran MS Damodaran.</p> <p>j. Accident records were well maintained and kept in the safety file. Sighted an accident case happen to Mr. Mohd Azhar Mohd Shapan. The chronology of the incident was detailed the in the JKKP 6 form. It was followed by the special meeting to discuss further in the incident.</p> <p><u>Keratong Estate POM</u></p>	

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		<ul style="list-style-type: none"> a. Policy has been communicated through Stakeholder meeting dated 11.03.2021. Sighted evidence of minutes and attendance. b. The HIRARC dated 21.01.2021 was made available to the audit team and reviewed. It was prepared by Mr. Mr Gajendran Subramaniam (SHO) and approved by Mr. Low Lam Sing (Mill Manager). The next review was scheduled on 21.01.2022. c. Training and briefing to the workers who were exposed to the chemicals was conducted by the management. Latest training conducted on 29.05.2021 for SDS, HIRARC, SOP and PPE. ERT – First Aiders Training conducted on 17.04.2021, attended by 6 participants. Keratong Estate POM has conducted awareness training on mill best practice. Evidence as below: <ul style="list-style-type: none"> 1. Safety FFB Grading dated 28.05.2021 2. Safety Training for Tractor Driver dated 09.02.2021 3. Confined space training dated 01.11.2020 d. PPE issuance records were made available to the audit team. Latest record sighted on 05.04.2021. Refer document receipt of PPE Keratong Estate POM. e. The mill management has established a safe working procedure in handling chemical. Some of the procedure’s outlines are receiving & storage of chemical, chemical dispenses from store to mixing area and scheduled waste disposal. Refer SOP Chemical Safety Handlings Of Chemical Part D, Chapter 2, 2021/NYC. f. The mill has appointed Mr. Joseph Yew Kim Wah as the committee secretary for OSH Committee. The appointment was made on 01.01.2021. Also sighted competency certificate (Registration 	

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		<p>Number HQ/21/SHO/00/03852 valid until 09.06.2024 and HQ/04/SHO/00/2524 valid until 28.03.2023) of HQ Safety Officer.</p> <p>g. The OSH committee has conducted their first OSH meeting for year 2021 on 18.03.2021. The meeting was chaired by Mr Low Lam Sing (Mill Engineer). Among the agenda discussed during the meeting were verified the agenda from previous meeting, workstation inspection, training & briefing, information on accident or near miss accident and others. As for year 2020, the committee has conducted 4 meetings.</p> <p>h. Emergency response plan was made available to the audit team. Training records were sighted and verified. ERP team has been set up as refer to Appointment Letter for ERT dated 12.05.2021.</p> <p>i. First aid training was conducted to the mill workers on 25.06.2021, attended by 5 participants. The training was conveyed by the Medical Assistant, Mr. Anuar.</p> <p>j. Accident records were well maintained and kept in the safety file. Latest JKKP 6 report on 29.09.2020. The chronology of the incident was detailed the in the JKKP 6 form. It was followed by the special meeting to discuss further in the incident.</p>	
Criterion 4.4.5: Employment conditions			
4.4.5.1	<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>- Major compliance -</p>	<p>The Social and Human Rights Policy is available in the office notice board signed by Mr. Goh Wei Lei, Executive Chairman dated 02/01/2019. The methods used to communicate the policy are by briefing during muster call and display at notice boards.</p>	Complied

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4.4.5.2	<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>- Major compliance -</p>	<p>The Social and Human Rights Policy is available in the office notice board signed by Mr. Goh Wei Lei, Executive Chairman dated 02/01/2019.</p> <p>It is stated that the company will 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. Based on the interview with the workers, there has been no experience of any form of discrimination.</p>	<p>Complied</p>
4.4.5.3	<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>- Major compliance -</p>	<p>For local, a standard format of appointment letter is available (version 2. 01/19). For foreign workers, employment contract (version 1. 01/19) is used. Based on the agreements, it was noted that the employees' pay, and conditions meet legal or industry minimum standards.</p>	<p>Complied</p>
4.4.5.4	<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>- Minor compliance -</p>	<p>There are no contractor workers in GME POM and KE POM.</p>	<p>Complied</p>
4.4.5.5	<p>The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>Lists of workers and staff were available at both sampled mills. The list consists the information about name, gender, DOB, IC/Passport No., passport expiry date, work permit expiry date, designation and date of join.</p>	<p>Complied</p>

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4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records. - Major compliance -	The employment contract is available and signed by both employee and employer. All the sampled employment contracts and appointment letters were signed by the employees. Nonetheless, based on the terms of the contract of service stipulated in the employment contract for foreign workers, there is no provision for workers to submit the "notice of termination of contract" should they choose to end their service. This is not in-line with Section 12 (2) of the Employment Act 1955. Thus, a non-conformity report was assigned due to this lapse.	Minor Non-conformity
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. - Major compliance -	Punch card is used to record the working days and overtime of all workers. Verification of the check roll confirm that the working days and overtime is tally with the payslips.	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. - Major compliance -	The break time is stated in employment contract i.e. 1100-1130 & 1130-1200 hr of 0730-1530 working hours. Verification of payslips and time recording system (punch card) showed that the overtimes were paid accordingly.	Complied
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	Based on samples, all wages and overtime met the minimum standard and employment contract.	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.	Other form of social benefits as sighted in the pay slip including company's contributions of EPF, SOCSO and EIS. Medical care and health provisions also provided for entire work force.	Complied

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	- Minor compliance -		
4.4.5.11	<p>In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.</p> <p style="text-align: center;">- Major compliance -</p>	<p>At GME POM, the workers are provided with free housing and water supply. Weekly inspection is done, and reports were available for verification. Electricity is supplied by national grid and the bill is borne (with government approval) by the workers themselves.</p> <p>At KE POM, the workers are provided with free housing and water supply. Weekly inspection is done, and reports were available for verification. Electricity and water are supplied by the mill for free. The water supply is 24-hours whereas electricity is supplied 11.5 hours/day based on schedule.</p>	Complied
4.4.5.12	<p>The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.</p> <p style="text-align: center;">- Major compliance -</p>	<p>Policy established as Social and Human Rights Policy; Signed by Executive Chairman (Goh Wei Lei); Date: 02/01/2019. Stated to provide workplace free of violence and sexual harassment whether directly or indirectly against all employees and stakeholders. Also referred to the Definition of Sexual Harassment; Ver. Control: 1.00; Date: 29/8/2018; Rev. -; Source: ILO. To-date, there have been no report related to sexual harassment or violence. There has been no complain with regards to sexual harassment so far at both sampled mills.</p>	Complied
4.4.5.13	<p>The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p>	<p>There is no restriction of worker to form any trade union or workers committee.</p>	Complied

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	- Major compliance -		
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. - Major compliance -	Established as Social and Human Rights Policy; Signed by Executive Chairman (Goh Wei Lei); Date: 02/01/2019. Stated 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 the employee master lists at all the visited estates, there was no evidence that children or young persons have been recruited.	Complied
Criterion 4.4.6: Training and competency			
4.4.6.1	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training. - Major compliance -	Training program has been made available to the audit team. Sighted the training and briefing records for workers and contractors. Sighted Training need analysis both for staff and workers for Keratong Estate POM has been prepared by Mr Ho Kai Keong dated 10.04.2021.	Complied
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description. - Major compliance -	Training needs analysis for 62 personnel has been made available to the audit team. It was prepared by Ms. Siti Aisyah Ab Rahman on 25.03.2021 and approved by Mr Shaeh Jiann Haur on 03.04.2021. Sighted Training need analysis both for staff and workers for Keratong Estate POM has been prepared by Mr Ho Kai Keong dated 10.04.2021.	Complied
4.4.6.3	A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure. - Minor compliance -	Training and briefing were conducted regularly on need basis. Sighted the training as follow: <u>Gua Musang Estate POM</u> i. Boiler safe working procedure, conducted on 22.03.2021, delivered by Mr. Mohammad Shaifullah and attended by 6 workers. ii. Kernel plant safe working procedure, conducted on 25.02.2021, delivered by Mr. Mohammad Shaifullah and attended by 3 workers.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> iii. Workshop safe working procedure, conducted on 16.02.2021, delivered by Mr. Mohammad Shaifullah and attended by 5 workers. iv. Crane handling safe working procedure, conducted on 28.01.2021, delivered by Mr. Mohammad Shaifullah and attended by 1 worker. v. FFB grading safe working procedure, conducted on 15.01.2021, delivered by Mr. Mohammad Shaifullah and attended by 6 workers. <p><u>Keratong Estate POM</u></p> <ul style="list-style-type: none"> i. Fire extinguisher training dated 28.07.2020 delivered by Mr Zaidi and attended by 23 participants. ii. General safety Training Mill dated 22.12.2020 delivered by Mr Baldap Singh and attended by 17 participants. iii. Safety Induction Training dated 06.03.2021 delivered by Mr Gajendran and attended by 8 participants. iv. MSPO and SCCS training dated 28.03.2021 delivered by Mr Ho Kai Keong and attended by 6 participants. v. Policy Training MSPO dated 11.03.2021 delivered by Mr Ho Kai Keong and attended by 25 participants. 	
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented. - Major compliance -	Chin Teck Plantations Berhad has established Environmental Policy, signed by Executive Chairman on 02.01.2019. The policy emphasis on the company's commitment to protect and to ensure all actions to reduce the oil palm operation impact towards the nature is in line with	Complied

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Criterion / Indicator		Assessment Findings	Compliance																					
		<p>the Environmental Quality Act 1974 and other related regulations or laws.</p> <p>The company is committed to ensure their milling operation as per guided in the environmental laws and regulations.</p> <p>Training / briefing for the MSPO policy was conducted on 16.03.2021.</p> <p>For Keratong Estate POM policy has been communicated through Stakeholder meeting dated 11.03.2021. Sighted evidence of minutes and attendance</p>																						
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <p>a) An environmental policy and objectives;</p> <p>b) The aspects and impacts analysis of all operations</p> <p>- Major compliance -</p>	<p>Environmental management plan for mill was made available to the audit team. The plan was assessed on 22.03.2021, prepared by Mr. Shaeh Jiann Haur (MSPO Officer) and approved by Mr. Lee Khen Siang (Senior Assistant Manager).</p> <p>Mr. Shaeh has assessed 20 workstation which give impact to the environment, and followed by the environmental impact analysis, mitigation measure and monitoring program.</p> <p>Some of the aspect impact sighted are:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 5%;">No</th> <th style="width: 65%;">Environmental Aspect</th> <th style="width: 30%;">Environmental Impact</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td>Use of petrochemical</td> <td>Pollution of soil and water.</td> </tr> <tr> <td style="text-align: center;">2</td> <td>Domestic waste from workers line site and office site.</td> <td>Pollution of soil and water course.</td> </tr> <tr> <td style="text-align: center;">3</td> <td>Chemical residue washed into water course</td> <td>Water pollution</td> </tr> <tr> <td style="text-align: center;">4</td> <td>EFB generated by the mill</td> <td>Land pollution</td> </tr> <tr> <td style="text-align: center;">5</td> <td>Smoke emission from mill</td> <td>Air pollution</td> </tr> <tr> <td style="text-align: center;">6</td> <td>Engineering works done in the mill area</td> <td>Air and land pollution</td> </tr> </tbody> </table>	No	Environmental Aspect	Environmental Impact	1	Use of petrochemical	Pollution of soil and water.	2	Domestic waste from workers line site and office site.	Pollution of soil and water course.	3	Chemical residue washed into water course	Water pollution	4	EFB generated by the mill	Land pollution	5	Smoke emission from mill	Air pollution	6	Engineering works done in the mill area	Air and land pollution	Complied
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Criterion / Indicator		Assessment Findings		Compliance
		7	Smoke emission from heavy vehicle Land and water pollution	
		<p><u>Keratong Estate POM</u></p> <p>Sighted Environmental Aspects Impact Assessment Guidance for Keratong Plam Oil Mill prepared by Mr Ho Kai Keong and approved by Mr Low Lam Sing dated 13.03.2021.</p> <p>Sighted assessment has been made according to Jadual Pematuhan DOE no 004153, expiry date on 30.06.2021.</p> <ol style="list-style-type: none"> 1. First Schedule (Regulation 10(2)) Quarterly Return Form AS:C31/152/000/033 dated 12.04.2021 2. Final Discharge report by NALCO Water Refer D/W25/12/21 dated 31.05.2021 3. Effluent release report for the month of April 2021 dated 03.05.2021 4. Noise Risk assessment report ref. no. NRA/200610 dated 22.06.2021 		
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored. - Major compliance -	Plan to mitigate the negative impacts and promote the positive ones is reflected in the environmental management plan and waste management plan. These plans generally included the control and monitoring procedure including the scheduled wastes and domestic wastes.		Complied
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Program to promote positive impacts had been included in the continual improvement plan.		Complied

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Criterion / Indicator		Assessment Findings	Compliance																														
4.5.1.5	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. - Major compliance -	Training and briefing were conducted on regular basis. Sighted a training programme by the mill management to the mill workers, which involved MSPO policy, environmental management plan, environmental impact & assessment and scheduled waste management & handling. This training was conducted on 16.03.2021 and attended by 43 workers.	Complied																														
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -	Gua Musang Estate POM management has conducted environmental performance monitoring committee Siri 1/2021 on 22.02.2021 at Chin Teck Plantations Berhad meeting room. The meeting was chaired by Mr. Lee Khen Siang and attended by 13 persons. For Keratong Estate POM, Environmental Meeting has been conducted on 15.01.2021 via Online Zoom. Refer Environmental Regulatory and Compliance Monitoring Committee ERCMC Meeting Minutes.	Complied																														
Criterion 4.5.2: Efficiency of energy use and use of renewable energy																																	
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within 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 - Major compliance -	<p>2021 Baseline summary (as at April 2021) for non-renewable energy sources consumption was made available to the audit team.</p> <p>Record for diesel usage are as follow:</p> <table border="1"> <thead> <tr> <th>Diesel</th> <th>Jan</th> <th>Feb</th> <th>Mar</th> <th>Apr</th> </tr> </thead> <tbody> <tr> <td>(L/Mt)</td> <td>0.78</td> <td>0.71</td> <td>1.31</td> <td>0.74</td> </tr> <tr> <td>FFB Processed (Mt)</td> <td>3852.87</td> <td>2942.03</td> <td>4417.68</td> <td>4742.90</td> </tr> </tbody> </table> <p>Record for electrical are as follow:</p> <table border="1"> <thead> <tr> <th>Electric kWh/Mt</th> <th>Jan</th> <th>Feb</th> <th>Mar</th> <th>Apr</th> </tr> </thead> <tbody> <tr> <td>Line site</td> <td>0.49</td> <td>0.59</td> <td>0.41</td> <td>0.37</td> </tr> <tr> <td>Mill</td> <td>5.04</td> <td>6.34</td> <td>3.94</td> <td>2.91</td> </tr> </tbody> </table>	Diesel	Jan	Feb	Mar	Apr	(L/Mt)	0.78	0.71	1.31	0.74	FFB Processed (Mt)	3852.87	2942.03	4417.68	4742.90	Electric kWh/Mt	Jan	Feb	Mar	Apr	Line site	0.49	0.59	0.41	0.37	Mill	5.04	6.34	3.94	2.91	Complied
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Criterion / Indicator		Assessment Findings					Compliance
		FFB Processed (Mt)	3852.87	2942.03	4417.68	4742.90	
4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. - Major compliance -	The estimation of the non-renewable energy was reflected in their annual budget. Sighted the budget for non-renewable energy cost for 2021 is RM21,300 for electricity and diesel is RM74,400. Sighted Energy Optimization Plan 2021 for Keratong Estate POM. The plan was prepared by Mr Ho Kai Keong dated 11.01.2021.					Complied
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	The mill uses fibre and shell as fuel for operating the boiler station 4.5.2.1					Complied
Criterion 4.5.3: Waste management and disposal							
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	The mill management has established a waste management plan where they have identified the waste, source and mitigation plan. Some of the waste identified as follow:					Complied
		Waste		Source			
		EFB		FFB			
		Decanter cake		FFB			
		Dust		Combustion			
		Effluent		Processing FFB			
		Syringe		Clinical waste			
		Domestic waste		Line site, office			
		Scrap iron		Workshop			
		Empty chemical container		Store, laboratory			

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Criterion / Indicator		Assessment Findings	Compliance																				
		Sighted Waste Management Plan for Keratong Estate POM for the year 2021. Refer Waste Management Plan Year 2021-Domestic and Office, Appendix 1A.																					
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>- Major compliance -</p>	<p>Consignment note for scheduled waste was made available to the audit team. SW410 (rags and used oil filter) were disposed to Pentas Flora (Kelantan) Sdn Bhd on 20.05.2021.</p> <p>EFB was disposed to the field where it can decompose and become organic matter which gives nutrient to the oil palm. Sighted the disposed record for April 2021, a total of 123.90 mt of EFB has been disposed.</p> <p>For Keratong Estate POM, sighted document "Pelupusan Tandan Kosong Kelapa Sawit (EFB) licence no. 004153, Borang D-EFB1999".</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>- Major compliance -</p>	<p>The mill developed as standard operating procedure for waste management, MSPO-P5-C3, dated on 01.07.2018. this procedure has outlined the workflow for waste management as follow; scheduled waste identification and collection and storage of scheduled waste.</p> <p>Disposal record for scheduled waste to Pentas Flora (Kelantan) Sdn Bhd was made available to the audit team (as explained in 4.5.3.2).</p> <p>For Keratong Estate POM, sighted evidence of Notification of generation of Scheduled Waste for the month of April, May, and June 2021. Refer record as reference number ASCR31/152/000/033 for Keratong Estate. Record as below:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Date</th> <th>SW305</th> <th>SW410</th> <th>SW422</th> </tr> </thead> <tbody> <tr> <td>April 21</td> <td>24.04.2021</td> <td>0.3820</td> <td>0.0320</td> <td>0.0120</td> </tr> <tr> <td>May 21</td> <td>31.05.2021</td> <td>0.2010</td> <td>0.0210</td> <td>0.0000</td> </tr> <tr> <td>June 21</td> <td>25.06.2021</td> <td>0.1820</td> <td>0.0310</td> <td>0.0240</td> </tr> </tbody> </table>	Month	Date	SW305	SW410	SW422	April 21	24.04.2021	0.3820	0.0320	0.0120	May 21	31.05.2021	0.2010	0.0210	0.0000	June 21	25.06.2021	0.1820	0.0310	0.0240	Complied
Month	Date	SW305	SW410	SW422																			
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May 21	31.05.2021	0.2010	0.0210	0.0000																			
June 21	25.06.2021	0.1820	0.0310	0.0240																			

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Criterion / Indicator		Assessment Findings	Compliance
		Disposal for scheduled waste has been conducted on 26.04.2021 by Kualiti Alam Sdn Bhd. Refer Consignment note: 20210426112HVOIAE.	
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. - Minor compliance -	Domestic waste disposed to Gua Musang Municipal dump site. For Keratong Estate POM, domestic waste was disposed at landfill. Refer record of Transporting Rubbish for the month of June 2021.	Complied
Criterion 4.5.4: Reduction of pollution and emission			
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	The assessment of polluting activities was conducted through environmental impact assessment (details in 4.5.1.3).	Complied
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	Among the action plan to reduce the emission and pollution were to install the Air Pollution Control System (70% completed) and Continuous Emission Monitoring Systems (to monitor the particulate produced from the process).	Complied
4.5.4.3	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. - Major compliance -	The effluent produced is treated biologically in anaerobic and aerobic retention ponds before being discharged as required by law. Weekly monitoring level was carried with quarterly reporting to DOE. Samples taken were sent to Nalco Industrial Services Malaysia Sdn Bhd for analysis. Sighted the samples analysis result and quarterly return form for the effluent analysis.	Complied
Criterion 4.5.5: Natural water resources			

Criterion / Indicator	Assessment Findings	Compliance															
<p>4.5.5.1</p> <p>The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> a) Assessment of water usage and sources. b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities. c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). <p>- Major compliance -</p>	<p>Method or techniques to maintain the quality and availability of natural water resources had been addressed in the Water Management Plan for Estate & Mill. Among the plans are:</p> <p><u>Gua Musang Estate POM</u></p> <ul style="list-style-type: none"> a. Record water usage b. Analyse water quality and ensure compliance with the legal requirements for in house treated water. c. Continue training of sprayers to minimise accidental overspray near buffer zones. d. Restoration of natural vegetation in riparian area where been removed. <p>Water sources for consumption is from the Sungai Ketil. Proper monitoring and treatment were conducted to ensure the water is safe for consumption.</p> <table border="1" data-bbox="1088 963 1904 1133"> <thead> <tr> <th>Water Supply Line</th> <th>2020</th> <th>2021 (as at Apr)</th> </tr> </thead> <tbody> <tr> <td>Raw River Water</td> <td>70091</td> <td>18081</td> </tr> <tr> <td>POM processed</td> <td>20388</td> <td>4772</td> </tr> <tr> <td>Domestic used</td> <td>49703</td> <td>13309</td> </tr> <tr> <td>FFB processed</td> <td>48380.4</td> <td>15955.5</td> </tr> </tbody> </table> <p>Samples were sent to Nalco Industrial Sdn Bhd for further analysis.</p> <p><u>Keratong Estate POM</u></p> <p>The water consumption comes from the treated water from Sungai Cabang Kanan, other than that verified that availability of Sungai Jeram, Sungai Kabung and Sungai Kelebang surrounding the estate</p>	Water Supply Line	2020	2021 (as at Apr)	Raw River Water	70091	18081	POM processed	20388	4772	Domestic used	49703	13309	FFB processed	48380.4	15955.5	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<p>and mill. Refer document identification of water source dated 21.01.2021 including 4 sample point. According to their water management plan, water analysis to be conducted once a year. Sighted the latest water sampling results conducted on 28.04.2021, analysed by NALCO Water. Refer Sampling Report point number 11A/21, 10D/21, 09P/21, 09N/21, and 09J/L/21. All result showed according to parameters.</p> <p>Sighted water management plan has been established on 16.01.2021 by Mr Ho Kai Keong. Refer Appendix 2, Water Management Plan for Palm Oil Mill.</p>	
4.5.5.2	<p>Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.</p> <p>- Major compliance -</p>	<p>Effluent was discharged to water course as per guided in the compliance schedule.</p> <p>For Keratong Estate POM sighted "Data Harian Pengeluaran Dan Pelupusan Effluent" data for April 2021 and May 2021. The parameter released was according to Jadual Pematuahan by DOE. Sighted POME analysis conducted by NALCO Water dated 31.05.2021. Refer report number D/W25/12/21.</p>	Complied
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Mill Management			
4.6.1.1	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> <p>- Major compliance -</p>	<p>Standard Operation Procedure for FFB Grading was made available to the audit team, released in 2019, version 3.0. This SOP has outlined the specification of the FFB for the grading process. There are 4 specifications which are:</p> <p>a. Specification 1: Reject-able Unripe/black, empty bunch, rotten bunch</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>b. Specification 2: Freshness A crops < 24 hours, B crops 24 – 48 hours, C crops > 48 hours.</p> <p>c. Specifications 3: Ripeness Ripe, Underripe</p> <p>d. Specification 4: Other Defects Long stalk, dirty, wet, small, pest damage, disease</p> <p>FFB Grading Report was made available during the audit process. Sighted the record was signed by the grader and approved by the mill supervisor.</p>	
4.6.1.2	<p>All palm oil mills shall implement best practices.</p> <p>- Major compliance -</p>	<p>The mill implements best practices as per guided in the SOP. Verification was made on daily basis by the Assistant Mill Engineer besides receiving visits from the chief engineer, Mr. Lim Xin Yi, conducted on 30.03.2021 – 01.0.2021. The visit focus on the mill performance review, maintenance & management issues and CAPEX & high value OPEX implementation progress.</p> <p>Keratong Estate POM has been conducted awareness training on mill best practice. Evidence as below:</p> <ol style="list-style-type: none"> 1. Safety FFB Grading dated 28.05.2021 2. Safety Training for Tractor Driver dated 09.02.2021 3. Confined space training dated 01.11.2020 	Complied
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	<p>A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.</p>	<p>A 10 years of documented business plan was made available to the audit team. Attention was given to the crop projection, cost of production, capital expenditure and revenue expenditure.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	For Keratong Estate POM, Business Plan has been established. Refer Estimate FY2021 Keratong Estate POM.	
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	Pricing mechanism is guided by CTP Policies Manual, Feb 2006, Chapter 6.0 Procurement, Ver. 1.0.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	All the appointed contractors have signed their respective contract agreements with CTP. Based on sampled vouchers, the payments were made in timely manner.	Complied
Criterion 4.6.4: Contractor			
4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	The contractors were made to understand the MSPO requirements through stakeholders meeting. Records of meetings were maintained for verification.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Copies of the signed contract agreement were available for verification.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	There is no objection by the management to accept MSPO approved auditors to verify the assessments through a physical inspection, if required.	Complied

Appendix B: List of Stakeholders Contacted

<p>Government Officer: Nil</p>	<p>Community/neighbouring village: Penghulu Program Perumahan Mesra Sejahtera (PPMS) Tok Batin Kg Ganoh</p>
<p>Suppliers/Contractors/Vendors: Chong Keek Shong (Heavy machinery contractor) Soon Lee Earthwork (Civil work) Sri Muadzam Trading Sdn Bhd (Hardware supplier)</p>	<p>Worker’s Representative/Gender Committee: Estates workers Mills workers Social Officer</p>

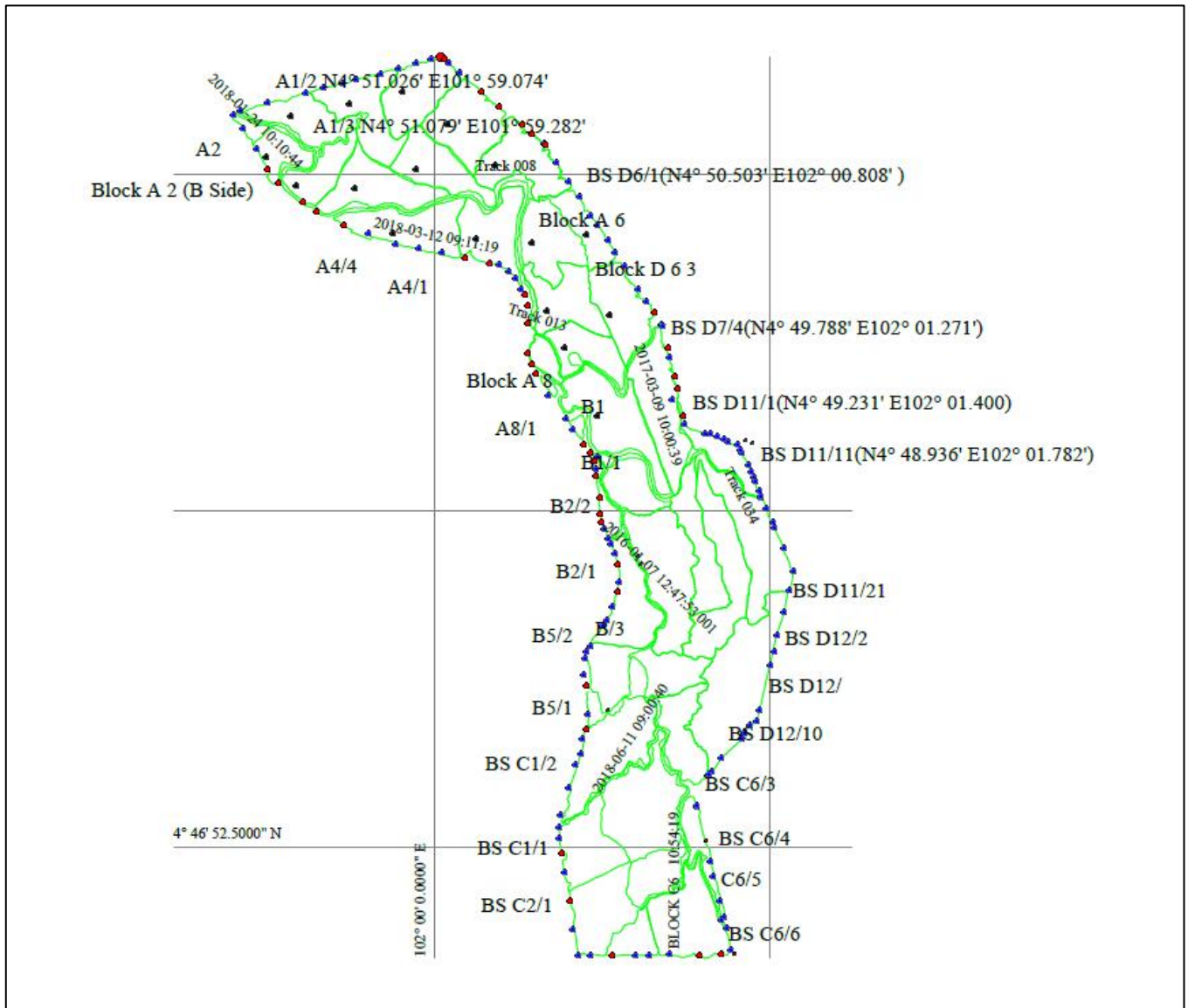
Appendix C: Smallholder Member Details

Not applicable.

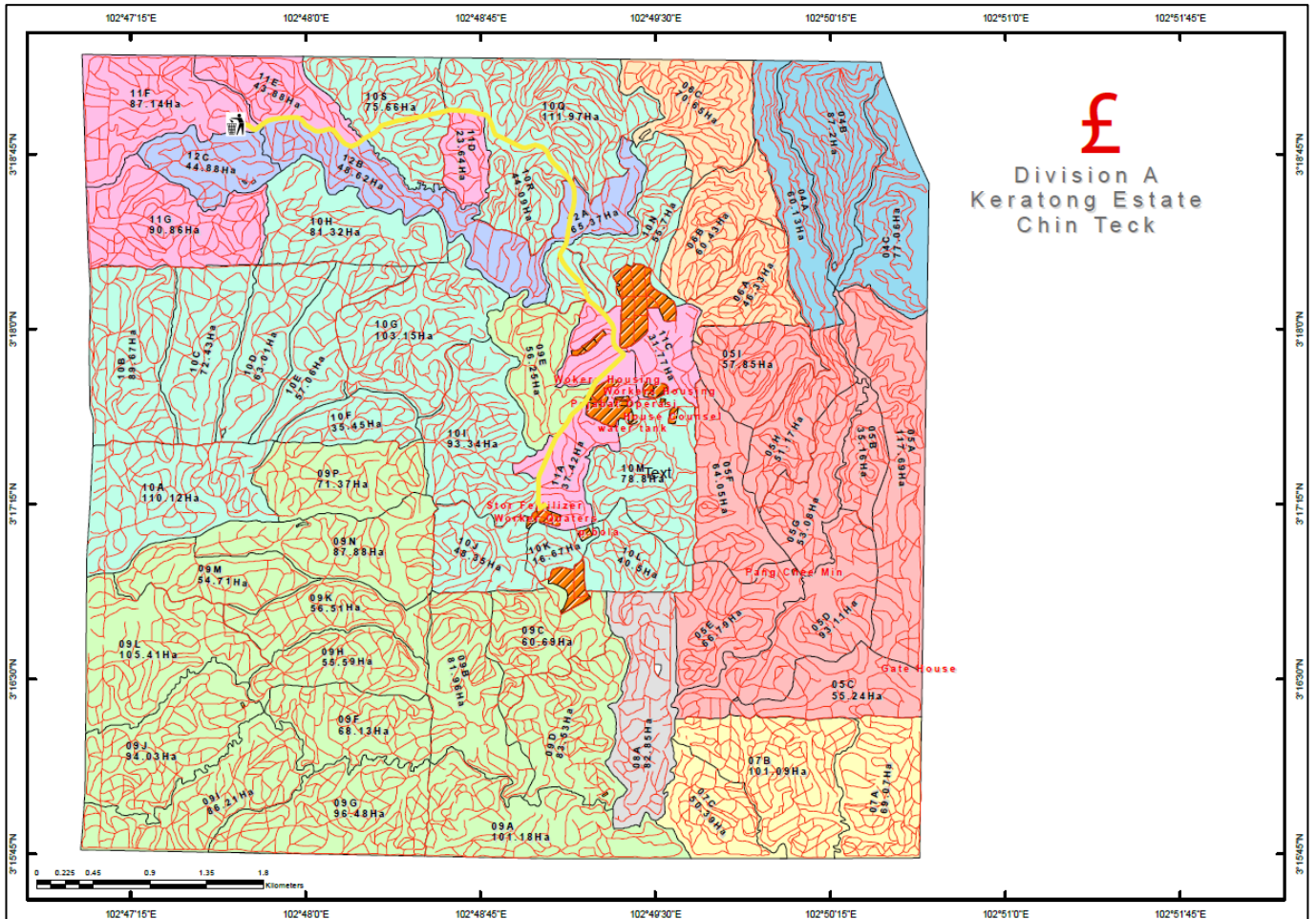
No.	Smallholder		Location of Planted Area (District)	GPS Coordinates	Certified Area (ha)	Planted Area (ha)
	Name	MPOB License Number				
	N/A					

Appendix D: Location and Field Map

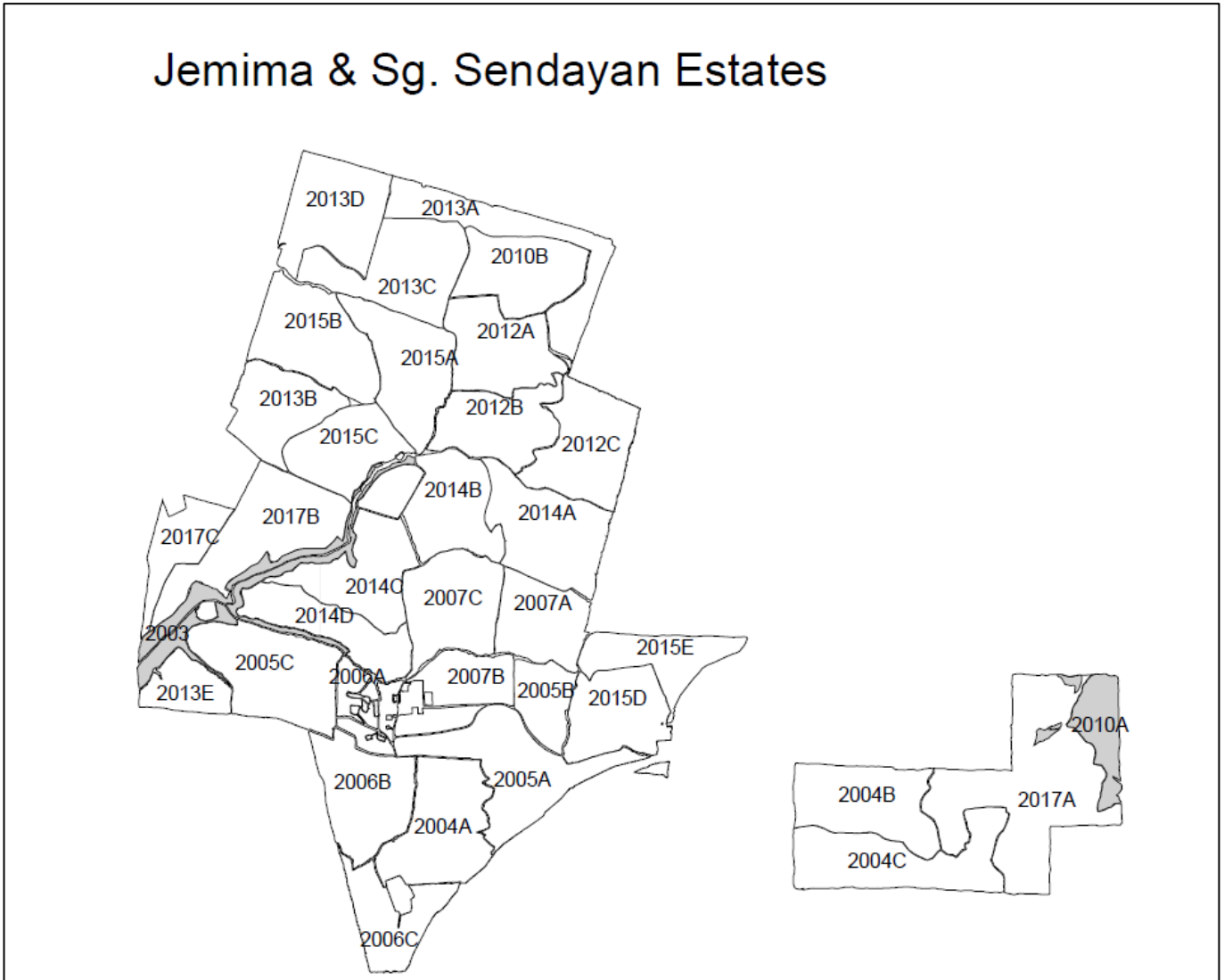
Gua Musang Estate POM and Gua Musang Estate



Keratong Estate POM and Keratong Estate (Div. A)



Jemima & Sq. Sendayan Estates



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