PF824 MSPO Public Summary Report Revision 2 (Nov 2021)

MALAYSIAN SUSTAINABLE PALM OIL MSPO OPMC Public Summary Report Initial Assessment Annual Surveillance Assessment (4) Recertification Assessment (Choose an item.)

BOUSTEAD PLANTATIONS BERHAD

Client Company (HQ) Address:

19th Floor Menara Boustead, 69, Jalan Raja Chulan

50200 Kuala Lumpur, Malaysia

Certification Unit:

Eldred Estate and Bekoh Estate

Date of Final Report: 9/10/2023

Report prepared by: VIJAY KANNA PAKIRISAMY (Lead Auditor)

Report Number: 3717736

Assessment Conducted by: BSI Services Malaysia Sdn Bhd, (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 | Boustead Plantations Berh | nad | | | | |
| Mill/Estate | Certification Unit MPOB License No. Expiry Date | | | | | |
| | Eldred Estate 504635402000 31/12/2023 | | | | | |
| | Bekoh Estate 616049002000 31/07/2023 | | | | | |
| Address | 19 th Floor Menara Bouste Malaysia | ead, 69, | Jalan Raja (| Chulan, | 50200 Kuala Lumpur, | |
| Management Representative | Azmariah Muhamed (Head, Sustainability and Safety Department) Mitah Limpu (Executive, Sustainability) | | | | | |
| Website | https://www.bousteadplantation E-mail bekoh@bplant.com.my | | | @bplant.com.my | | |
| Telephone | 03-2145 2121 | | Facsimile | 03-214 | 14 7917 | |

| 1.2 Certification Informa | 1.2 Certification Information | | | | | | |
|--|---|---|---|-------------------------|--|--|--|
| Certificate Number | MSPO 697579 | | Certificate Start Date | 18/04/2019 | | | |
| Date of First Certification | 18/04/2019 | Certificate Expiry Date 17/04/2024 | | | | | |
| Scope of Certification | | □ Mill: Production of Sustainable Palm Oil and Palm Oil Products ☑ Estate: Production of Sustainable Oil Palm Fruits | | | | | |
| Visit Objectives | The objective of the ASA 4 is to ensure the elements of the scope of registration and the requirements of the management standard are effectively addressed by Eldred Estate and Bekoh Estate's management system and the ability of the management system to ensure the organisation meets applicable statutory, regulatory and contractual requirements and as applicable, to identify areas for potential improvement of the management system. | | | | | | |
| Standard | □ MSPO MS 2530-2: | :2013 · | - General Principles for Indep | endent Smallholders | | | |
| | ⊠ MSPO MS 2530-3 Organized Smallho | | - General Principles for C | il Palm Plantations and | | | |
| | □ MSPO MS 2530-4: | :2013 · | - General Principles for Palm | Oil Mills | | | |
| Stage 1 Date | | 28 - 29/08/2018 | | | | | |
| Stage 2 / Initial Assessmen | t Visit Date (IAV) | 23 - 24/11/2018 | | | | | |
| Continuous Assessment Visit Date (CAV) 1 | | | 14 - 15/05: Remote & 17 - 18/06/2020: On-site | | | | |
| Continuous Assessment Vis | it Date (CAV) 2 | 08 - 12/03/2021 | | | | | |
| Continuous Assessment Vis | it Date (CAV) 3 | 21 - 25/03/2022 | | | | | |
| Continuous Assessment Vis | it Date (CAV) 4 | 06 - 0 | 09/06/2023 | | | | |

| 1.3 Other Certifications | | | | | | | |
|--------------------------|-------------|-----------------------|-------------|--|--|--|--|
| Certificate Number | Standard(s) | Certificate Issued by | Expiry Date | | | | |
| N/A | N/A | N/A | N/A | | | | |

| 1.4 Location of Certification Unit | | | | | | |
|------------------------------------|--|----------------------------------|-------------------|--|--|--|
| Name of the Certification Unit | | GPS Reference of the site office | | | | |
| (Estate) | Site Address | Latitude | Longitude | | | |
| Bekoh Estate | Jalan Bekoh, 84900 Tangkak, Johor, Malaysia | 2° 21' 27.40" N | 102° 32' 17.20" E | | | |
| Eldred Estate | Jalan Ladang Eldred, 86500 Bekok, Johor, Malaysia | 2° 16' 40.80" N | 103° 06' 54.70" E | | | |

| 1.5 Certified Area | | | | | | | | |
|--------------------|---|-------------|-----------------------------------|--------------------|-----------------|--|--|--|
| Estate | Total Planted (Mature + Immature) (ha) | HCV (ha) | Infrastructure & Other (ha) | Total Area (ha) | % of Planted | | | |
| Bekoh Estate | 1,188.40 | 0 | 37.70 | 1,226.10 | 96.93 | | | |
| Eldred Estate | 1,793.50 | 0 | 33.80 | 1,827.30 | 98.15 | | | |
| Total (ha) | 2,981.90 | 0 | 71.50 | 3,053.40 | | | | |

1.6 Plantings & Cycle

| Cababa | Age (Years) | | | | | Mature | Turrenteres |
|---------------|-------------|----------|---------|---------|---------|----------|-------------|
| Estate | 0 - 3 | 4 - 10 | 11 - 20 | 21 - 25 | 26 - 30 | Mature | Immature |
| Bekoh Estate | 206.90 | 397.60 | 185.70 | 318.10 | 80.10 | 981.50 | 206.9 |
| Eldred Estate | 676.10 | 663.70 | 453.70 | - | - | 1,117.40 | 676.10 |
| Total (ha) | 883.00 | 1,061.30 | 639.40 | 318.10 | 80.10 | 2,098.90 | 883.00 |
| Note: | | • | | | | | <u>.</u> |

Note:

1. Only Mature area is considered as production area.

1.7 Certified Tonnage of FFB

| | Tonnage / year | | | | | |
|---------------|-------------------|-------------------|-------------------|--|--|--|
| Estate | Estimated | Actual | Forecast | | | |
| | (Apr 22 - Mar 23) | (Mar 22 - May 23) | (Apr 23 - Mar 24) | | | |
| Bekoh Estate | 18,644.27 | 21,989.83 | 22,000.00 | | | |
| Eldred Estate | 20,710.00 | 23,408.64 | 21,840.00 | | | |
| Total (mt) | 39,354.27 | 45,398.47 | 43,840.00 | | | |

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| 1.8 Uncertified Tonnage of FFB | | | | | | |
|--------------------------------|--------------------------------|-----------------------------|-------------------------------|--|--|--|
| | Tonnage / year | | | | | |
| Estate | Estimated (Apr 22 - Mar 23) | Actual (Mar 22 - May 23) | Forecast (Apr 23 - Mar 24) | | | |
| Nil | N/A | N/A | N/A | | | |
| Total (mt) | N/A | N/A | N/A | | | |

1.9 Certified Tonnage

| 1.9 Certified Tollinage | | | | | | |
|-------------------------|-------------------|-------------------|-------------------|--|--|--|
| | Estimated | Actual | Forecast | | | |
| | (Apr 22 - Mar 23) | (Mar 22 - May 23) | (Apr 23 - Mar 24) | | | |
| Mill Capacity: | FFB | FFB | FFB | | | |
| NA | 39,354.27 | 45,398.47 | 43,840.00 | | | |
| SCC Model: | CPO (OER: %) | CPO (OER: %) | CPO (OER: %) | | | |
| NA | N/A | N/A | N/A | | | |
| | PK (KER: %) | PK (KER: %) | PK (KER: %) | | | |
| | N/A | N/A | N/A | | | |

| 1.10 Actual Sold Volume (CPO) | | | | | | |
|-------------------------------|----------------|-------------|---------------|--------------|-------|--|
| $(\mathbf{PO}(\mathbf{mt}))$ | MSPO Certified | Other Schen | nes Certified | Conventional | Total | |
| CPO (mt) | MSPO Certified | ISCC | RSPO | Conventional | Total | |
| N/A | N/A | N/A | N/A | N/A | N/A | |

| 1.11 Actual Sold Volume (PK) | | | | | | | |
|------------------------------|----------------|-------------|---------------|--------------|-------|--|--|
| DK (mat) | MEDO Cortified | Other Schen | nes Certified | Conventional | Total | | |
| PK (mt) | MSPO Certified | ISCC | RSPO | Conventional | Total | | |
| N/A | N/A | N/A | N/A | N/A | N/A | | |



Section 2: Assessment Process

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 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 on-site assessment was conducted from 06 - 09/06/2023. The audit programme is included as Section 2.4. The approach to the audit was to treat the plantations as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. MS 2530-3:2013 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The Certification Unit were not using MSPO certification marks for any type of on- and off-product communication. The Certification Unit are compliance with the use of the MSPO Logo and related claims.

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

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.6.

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.

All the previous nonconformities are remains closed. The assessment findings from the initial assessment are detailed in Section 4.2.

The Major NC close out assessment was conducted on 24/08/2023. Based on the NC's correction and corrective action plan, it was justified that documented evidence were sufficient as evidence of closure to address the raised NC. Documented and Pictorial Evidence was provided by the management and reviewed by the assessment team and found to have successfully address the raised NC.

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This report was externally reviewed by MSPO approved Peer Reviewer prior to certification and recertification decision by BSI. For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

The following table would be used to identify the locations to be audited each year in the 5year 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) |
| Bekoh Estate | \checkmark | \checkmark | \checkmark | \checkmark | \checkmark |
| Eldred Estate | \checkmark | \checkmark | \checkmark | \checkmark | \checkmark |

Tentative Date of Next Visit: June 4, 2024 - June 7, 2024

Total No. of Mandays: 8 Mandays

2.1 BSI Assessment Team

| Team Member Name | Role (Team Leader or Team member) | Qualifications (Short description of the team members) |
|---------------------------|--|--|
| Vijay Kanna Pakirisamy | Team Leader | Education: Holds a Bachelor's Degree in Agribusiness Science Management with |
| (VKP) | | Honours from University Utara Malaysia. |
| | | Work Experience: |
| | | He has 10 years' experience in Oil Palm Estate Management in leading Oil Palm Companies such as KL Kepong Bhd, IOI Plantations and United Plantations. The last position held was Senior Assistant Manager. His experience includes the day-to-day estate operations and ensures the implementation of RSPO, ISCC and MSPO certification. He has been a sustainable palm oil auditor since 2019. |
| | | Training attended: |
| | | He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO SCCS Lead Auditor Course, Endorsed MSPO Lead Auditor Course, HCV & HCS Introductory Training, SMETA Requirements Training, RSPO Independent Smallholder (IHS) Auditor Training, and Endorsed RSPO P&C Refresher Trainings. |
| | | Aspect covered in this audit: |

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| | | During this assessment, he assessed on the aspects of Occupational, Health & Safety, Environment, HCV and Estate Best Practises. |
|----------------------------|-------------|--|
| | | Language proficiency: |
| | | He is fluent in English, Bahasa Malaysia, Tamil. |
| Muhammad | Team Member | Education: |
| Fadzli bin Masran (MFM) | | Bachelor of Forestry Science from University Putra Malaysia. |
| | | Work Experience: |
| | | Started the career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day-to-day plantation operations and had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. |
| | | Training attended: Completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018. |
| | | Aspect covered in this audit: |
| | | During the assessment, he covered Policy and commitment, social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, Stakeholder Consultation, land & Legal issue, and other requirements. |
| | | Language proficiency: |
| | | Fluent in Bahasa Malaysia and English Language. |

2.2 Impartiality and conflict of interest

During this assessment there was no circumstances or pressure that had influenced the independence or confidentiality of the assessment team.

2.3 Accompanying Persons

| No. | Name | Role |
|-----|------|------|
| - | - | - |

2.4 Assessment Plan

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

| Date | Time | Subjects | VKP | MFM |
|-----------------------|-------------|------------------------------------|--------------|--------------|
| 05/06/2023, Monday | - | Auditors travel from Kuala Lumpur. | \checkmark | \checkmark |
| | 0900 - 0930 | Opening meeting | | |

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| Date | Time | Subjects | | MFM |
|---|-------------|---|--------------|--------------|
| 06/06/2023, Tuesday | | Opening presentation by audit team leader Confirmation of assessment scope and finalize audit plan | \checkmark | \checkmark |
| Tuesudy | 0930 - 1230 | | | |
| | | Bekoh Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled wastes management, workers housing, clinic, Landfill, etc. | \checkmark | ~ |
| | 1230 - 1330 | Lunch break | \checkmark | \checkmark |
| | 1330 - 1630 | Document review P1 – P7 (MSPO Part 3): General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc. | \checkmark | 1 |
| | 1630 - 1700 | Interim closing meeting | \checkmark | \checkmark |
| 07/06/2023, | 0900 - 1230 | Bekoh Estate | | |
| Wednesday | | Continue Document review P1 – P7 (MSPO Part 3): General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc. | \checkmark | ~ |
| | 1000 - 1200 | Stakeholder consultation – Government Agencies, NGO, Surrounding Communities, and Contractors/Vendors. | - | \checkmark |
| | 1230 - 1330 | Lunch break | | \checkmark |
| 1330 - 1630 Continue Document review P1 – P7 (MSPO Part 3): General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc. | | V | 1 | |
| | 1630 - 1700 | Interim closing meeting | \checkmark | \checkmark |
| 08/06/2023, | 0900 - 1230 | Eldred Estate | | |
| Thursday | | Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled wastes management, workers housing, clinic, Landfill, etc. | \checkmark | ~ |
| | 1000 - 1200 | Stakeholder consultation – Government Agencies, NGO, Surrounding Communities, and Contractors/Vendors. | - | \checkmark |
| | 1230 - 1330 | Lunch break | \checkmark | \checkmark |

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| Date | Time | Subjects | VKP | MFM |
|-------------------------|-------------|---|--------------|--------------|
| | 1330 - 1630 | Document review P1 – P7 (MSPO Part 3): General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc. | \checkmark | ~ |
| | 1630 - 1700 | Interim closing meeting | \checkmark | \checkmark |
| 09/06/2023, Friday | 0900 - 1230 | Eldred Estate Continue Document review P1 – P7 (MSPO Part 3): General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc. | | ~ |
| | 1230 - 1330 | Lunch break | \checkmark | \checkmark |
| | 1330 - 1600 | Continue Document review P1 – P7 (MSPO Part 3): General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc. | | ~ |
| | 1600 - 1630 | Assessment team discussion and preparation | | \checkmark |
| | 1630 - 1700 | Closing Meeting | | \checkmark |
| 10/06/2023, Saturday | - | Audit team travel to Kuala Lumpur | | \checkmark |

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. The findings summary of the assessment by criteria are listed in Appendix A.

During the assessment there were Four (4) Major & Two (2) Minor nonconformities and Zero (0) OFI raised. The Eldred Estate and Bekoh Estate Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

| | Non-Conformity Report | | | |
|--------------------------------|---|---------------------------------------|-------------------------------------|--|
| NCR Ref #: | 2355071-202306-M1 | Issue Date: | 09/06/2023 | |
| Due Date: | 07/09/2023 | Date of Closure: | 06/09/2023 | |
| Area/Process: | Bekoh Estate | Clause & Category: (Major / Minor) | MSPO 2530 Part 3: 4.4.5.11 Major | |
| Requirements: | In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation. | | | |
| Statement of Nonconformity: | The perimeter drain condition at the linesite area was not accordance to the Workers' Minimum Standards of Housing and Amenities Regulations 1990 – Amendment 2021, updated on 06/03/2021. | | | |
| Objective Evidence: | Bekoh Estate Sighted during site visit at the housing area, it was noted that the main drain and | | | |
| | drain surrounding houses located in front of the temple were clogged with debris and garden waste. This was against the Workers' Minimum Standards of Housing and Amenities Regulations 1990 – Amendment 2021, updated on 06/03/2021 in section 23 (1)(b) | | | |
| | stated. | , | -,, | |

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| | "The perimeter drains around each dwelling or block of dwellings including all outlet drains are kept in a good state of repair and clear of refuse or undergrowth to permit free flow of water" | |
|------------------------|--|--|
| Corrections: | Clear the clogged drainage area. Repair the damaged drain. | |
| Root cause analysis: | ousing inspection checklist was not comprehensive i.e., did not include the drain ondition, and no complaint regarding the drain received by the estate anagement. | |
| Corrective Actions: | Revise housing inspection checklist by including the item "drain condition". Conduct training for staff who conduct housing inspections using the revised housing inspection checklist. Conduct grievance procedure training to all worker to ensure housing problem | |
| Assessment Conclusion: | were addressed by the estate management. The clogged drain has been cleared by the management. Pictorial evidence was available for verification clearly indicating the clogged drain has been cleared and was free from weeds and rubbish. | |
| | The damaged drain has been repaired by placing new drain slabs and cemented accordingly. Pictorial evidence was available for verification. The "Workplace Inspection Checklist – Housing" has been revised and the new checklist was available for verification. The checklist has been revised to include drainage as part of the monitoring. Sampled the checklist dated 07/07/2023. Training for Staffs on Housing Inspection was conducted on 07/07/2023 with records available for verification. Grievance Procedure training was conducted on 17/07/2023 for all worker to | |
| | Since a state of the state of t | |

| | Non-Conformity Report | | | |
|--------------------------------|--|--|---|--|
| NCR Ref #: | 2355071-202306-M2 | Issue Date: | 09/06/2023 | |
| Due Date: | 07/09/2023 | Date of Closure: | 06/09/2023 | |
| Area/Process: | Bekoh Estate | Clause & Category: (Major / Minor) MSPO 2530 Part 3: 4.4.5.4 Major | | |
| Requirements: | Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. | | | |
| Statement of Nonconformity: | The contractor's documentation in the pay slips and salary payment was not accordance to the applicable legal requirements | | | |
| Objective Evidence: | | | nple contractor's workers with month of June 2022, October | |

| | 2022 and March 2023, noted that the SOCSO contribution was not documer in the salary slips. | nted |
|------------------------|---|--------------|
| | Noted during salary slips review, 1 worker with underpaid salary for month October 2022. Details as follows: | h of |
| | Worker's passport no: C 817XXXX | |
| | Working day: 25 days | |
| | - Salary that should be paid RM 57.69 x $25 = RM 1,442.25$ | |
| | Actual Salary paid: RM 1,415.22 | |
| | – Difference: RM 27.03 | |
| Corrections: | Identify contractor workers' payslip that has not stated SOCSO contribut Instruct the contractor to redo the payslip by including the SOCSO contribut and provide the revised payslip to their workers. Require a copy of Borang SOCSO from contractor as estate's reference. | tion |
| | Inform the contractors. Contractors to compensate the unpaid wages to workers (Passport No.: C 8173XXXX). Require a copy of payment record payment voucher, for the worker as estate's reference. | |
| Root cause analysis: | No dedicated estate staff to monitor and check the payslip and payment d by the contractor to his employees. | one |
| | Contractor was not well verse with the wage's requirement as per Minim Wages Order 2022 and payslip requirement i.e., mandatory details to included. | |
| Corrective Actions: | Appoint person in-charge among estate staff to monitor and review contract employee's payment, monthly basis. | or's |
| | Establish monitoring checklist for contractor's employee's payment i.e., SOC contribution, etc. | CSO |
| | Conduct training on wage's requirement as per Minimum Wages Order 2 and payslip requirement to the contractor. | 022 |
| Assessment Conclusion: | The contractor has been instructed by the management to include the SOC deductions in their workers' payslips. Samples of Payslips for the month of A May and June 2023 were verified to have included the SOCSO deduction for sampled workers. The SOCSO Form 8A were also verified to show contribution being done for SOCSO for the mentioned workers. | pril, the |
| | The contactor has reimbursed the unpaid wages to his workers (Passport N C 817XXXX). Sighted the workers' Payslip for the Month of June to include reimbursement. | |
| | The management has appointed a person in-charge among estate staft monitor and review contractor's employee's payment, monthly basis. appointment letter dated 01/07/2023 undersigned by the estate manager available for verification. | The |
| | The estate has established a checklist entitled "Payslip Checklist" to monitor contractors workers' payslips to ensure complies with all legal requireme The checklist was available for verification. | |
| | A training on Workers Payslips has been conducted for the contractors 02/07/2023 with records available for verification. | on |

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| The implementation of the correction and corrective action plan was seen to be able to address the raised non-conformity. Therefore, the major non-conformity was closed on 06/09/2023. |
|---|
| |

| Non-Conformity Report | | | | | |
|--------------------------------|---|---|--------------------------------|--|--|
| NCR Ref #: | 2355071-202306-M3 | Issue Date: | 09/06/2023 | | |
| Due Date: | 07/09/2023 | Date of Closure: | 06/09/2023 | | |
| Area/Process: | Eldred & Bekoh Estate | te Clause & Category: (Major / Minor) MSPO 2530 Part 3: 4.4.4.1 Major | | | |
| Requirements: | An occupational safety a communicated and impl | · / · | all be documented, effectively | | |
| Statement of Nonconformity: | The OSH Plan and Safet | y Measures were not adequa | ately implemented. | | |
| Objective Evidence: | <u>Eldred Estate</u> 1. The NRA Report (Document Number: N087/2022 – 014) has recommended that the Tractor Driver, Mechanic, Carabao Driver and Grass Cutter to undergo Audiometric Test every year. There was no evidence of the audiometric test being conducted for the mentioned workers at the estate. 2. The Oxygen and Acetylene tanks used for welding works at the estate were not | | | | |
| | equipped with Flashback Arrestors. The risk associated to leakage were not adequately assessed in the HIRARC. <u>Bekoh Estate</u> 1. During the field visit at Bekoh Estate, it was sighted that there were 2 tractor | | | | |
| | drivers not wearing appropriate PPE (Safety Helmet) while driving the tractors. This was not in line with the HIRARC for Tractor Drivers. | | | | |
| Corrections: | <u>Eldred Estate</u> 1. Obtain quotation from certified clinic. Next, request for approval to appoint clinic to conduct the audiometric test. Then, immediately send workers for audiometric test at the certified clinic once the approval obtained. | | | | |
| | 2. Immediately install the Flashback Arrester and conduct reassessment for oxygen and acetylene associated to leakage. Next, review and update its HIRARC. | | | | |
| | Bekoh Estate | | | | |
| | 1. Conduct training to tractor drivers regarding safety and the requirement of wearing PPE. | | | | |
| | 2. Conduct daily monitoring of PPE. | | | | |
| Root cause analysis: | <u>Eldred Estate</u> There is no specialised NRA-trained staff at the estate. The person in charge (PIC) of legal was stationed at the head office and no monitoring on the implementation of NRA recommendation was done by the PIC as no feedback from the estate regarding the report. | | | | |
| | Flashback arrester was ordered on 02/06/2023; however, it had not yet been received on the day of the audit. Bekoh Estate | | | | |

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| | 1. Inconsistent monitoring by estate management due to frequent changes of PIC in previous 12 months in addition to personnel breaking estate instructions for PPE usage despite verbal warnings and training on safety requirements for PPE usage. | | |
|------------------------|--|--|--|
| Corrective Actions: | Eldred Estate | | |
| | Appoint person in-charge at the estate to monitor the implementation of the Noise Risk Assessment (NRA) recommendation and to feedback the implementation to the PIC legal at head office. Next, request SSD to conduct training pertaining to NRA Report. | | |
| | 2. Establish monitoring system for any goods purchased from supplier to ensure health and safety implementation for oxygen and acetylene tank were effective. | | |
| | Bekoh Estate | | |
| | 1. Conduct daily monitoring of PPE usage, weekly reminder during muster call for PPE wearing, and quarterly PPE training. | | |
| Assessment Conclusion: | Eldred Estate | | |
| | 1. A quotation for Audiometric Test was obtained dated 17/01/2023 and available for verification. On 08/07/2023, the estate has requested approval to conduct an audiometric test for 6 of its workers identified to be exposed to excessive noise with approval granted. The 6 workers were sent for audiometric test at Klinik Nur, Batu Pahat on 26/07/2023. The results were available for verification. | | |
| | 2. The Estate Technical Staff has been appointed as the PIC for Noise Risk Assessment at the estate to monitor the requirements of the NRA. The appointment letter dated 01/02/2023 was available for verification. Email requesting SSD to conduct training pertaining to NRA Report was available for verification. SSD has responded and will plan for the training to be conducted. | | |
| | 3. The Flashback Arrestor has been purchased and installed at the tanks accordingly. Pictorial evidence was available to support the evidence. The HIRARC has been updated to include the risks associated to the oxygen and acetylene tanks and was available for verification. | | |
| | 4. The Safety Monitoring at Workplace Checklist has been established to include monitoring of Flashback Arrestor at the Workshop – Welding Operation. The records dated 10/06/2023 were available for verification. | | |
| | Bekoh Estate | | |
| | 1. A Training on PPE was conducted for the Tractor and MTG Drivers on 10/07/2023 with records available for verification. | | |
| | A record book was established titled "Record – daily Monitoring of PPE Usage - Bekoh Estate" and available for verification. The monitoring for the month of July and August 2023 was available for verification. | | |
| | 3. Records of weekly briefing were available for verification. | | |
| | The implementation of the correction and corrective action plan was seen to be able to address the raised non-conformity. Therefore, the major non-conformity was closed on 06/09/2023. | | |
| | | | |

| Non-Conformity Report | | | |
|---|--|--|--|
| NCR Ref #: 2355071-202306-M4 Issue Date: 09/06/2023 | | | |

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| Due Date: | 07/09/2023 | Date of Closure: | 06/09/2023 | |
|--------------------------------|--|--|------------------------------------|--|
| Area/Process: | Eldred Estate and Bekoh Estate | Clause & Category: (Major / Minor) | MSPO 2530 Part 3: 4.5.3.3 Major | |
| 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. | | | |
| Statement of Nonconformity: | compliance with Envir | The inventory and storage of Scheduled Waste at the estates were not in compliance with Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974. | | |
| Objective Evidence: | The inventory and storage of Scheduled Waste at the estates were not in compliance with Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974, Evidence as below. <u>Eldred Estate and Bekoh Estate</u> 1. (9) Storage of Scheduled Waste - "Any person may store scheduled wastes generated by him for 180 days or less after its generation". It was verified that the estate has stored SW409, SW305 and SW410 exceeding the allowable timeline. 2. (11) A waste generator shall keep accurate and up-to-date inventory in accordance with the Fifth Schedule of the categories and quantities of scheduled wastes being generated, treated and disposed of and of materials or product recovered from such scheduled wastes for a period up to three years from the date the scheduled wastes were generated. It was verified that the estate did not maintain accurate inventory of its generated scheduled waste. | | | |
| Corrections: | <u>Eldred Estate</u> Scheduled wastes have been disposed on 06/06/2023. Notify the Department of Environment (DoE) for the inaccuracy figures of Schedule Waste Inventory in the eSWIS system. <u>Bekoh Estate</u> Immediately dispose the scheduled waste via Kualiti Alam and request extension for scheduled waste storage of more than 180 days, simultaneously. Update the scheduled waste inventory in eSWIS. | | | |
| Root cause analysis: | Eldred Estate 1. No dedicated staff to monitor the scheduled wastes disposal. 2. Estate have disposed scheduled wastes on 15/03/2023, however, the inventory record in the eSWIS system is inaccurate. Bekoh Estate 1. No dedicated staff to monitor the scheduled wastes disposal. 2. No dedicated staff to update the schedule waste inventory in eSWIS. | | | |
| Corrective Actions: | <u>Eldred Estate</u> Appoint person in-charge to monitor the scheduled wastes disposal. Update Scheduled Waste inventory monthly basis. In case of inaccuracy of inventory record, immediately notify Department of Environment for reconciliation of data. | | | |

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| | Bekoh Estate | | |
|------------------------|--|--|--|
| | 1. Appoint person in-charge to monitor scheduled waste disposal. | | |
| | 2. Appoint person in-charge to update scheduled waste inventory in eSWIS. | | |
| Assessment Conclusion: | Eldred Estate | | |
| | Scheduled wastes have been disposed on 19/06/2023. Records of disposal were available and sampled as below. | | |
| | SW102 – Used Battery; Consignment Note: 2023061916YC6ZO8; Date: 19/06/2023; Quantity: 0.0890 Mt; Disposed via Kualiti Alam Sdn Bhd. | | |
| | SW410 – Used Filter and Cotton Rags; Consignment Note: 2023061917K2G09R; Date: 19/06/2023; Quantity: 0.4970 Mt; Disposed via Kualiti Alam Sdn Bhd. | | |
| | SW305 – Used Lubricant Oil; Consignment Note: 2023061917SG4W2E; Date: 19/06/2023; Quantity: 0.1150 Mt; Disposed via Kualiti Alam Sdn Bhd. | | |
| | SW409 – Chemical Container; Consignment Note: 2023061917YUDIX0; Date: 19/06/2023; Quantity: 0.0700 Mt; Disposed via Kualiti Alam Sdn Bhd. | | |
| | 2. Department of Environment (DOE) Muar has been notified on the inaccuracy figures of Schedule Waste Inventory in the eSWIS system with document dated 15/08/2023 available for verification. | | |
| | 3. The estate management have appointed the Sustainability Staff to be responsible on Scheduled Waste Management at the estate, as stated in the appointment letter dated 01/02/2023, undersigned by the Estate Manager. | | |
| | Scheduled Waste Inventory has been updated via eSWIS System. Records of inventory were available for January 2023 – August 2023. | | |
| | Bekoh Estate | | |
| | Scheduled wastes have been disposed on 15/08/2023. Records of disposal were available and sampled as below. | | |
| | SW305 – Spent Lubricating Oil; Consignment Note: 2023081509VA3N2M; Date: 15/08/2023; Quantity: 2.0440 Mt; Disposed via Kualiti Alam Sdn Bhd. | | |
| | SW306 – Spent Hydraulic Oil; Consignment Note: 2023081509LSDAQH; Date: 15/08/2023; Quantity: 0.4180 Mt; Disposed via Kualiti Alam Sdn Bhd. | | |
| | SW409 – Chemical Container; Consignment Note: 2023081509GLKWY5; Date: 15/08/2023; Quantity: 0.0040 Mt; Disposed via Kualiti Alam Sdn Bhd. | | |
| | SW410 – Used Filter; Consignment Note: 20230822112WSK4J Date: 22/08/2023; Quantity: 0.0800 Mt; Disposed via Kualiti Alam Sdn Bhd. | | |
| | 2. The eSWIS Inventory has been updated with records of August 2023 available for verification. | | |
| | 3. The estate has appointed a PIC to be responsible for monitoring of scheduled waste disposal and waste inventory via eSWIS as stated in the appointment letter dated 01/07/2023, undersigned by the estate manager. | | |
| | The implementation of the correction and corrective action plan was seen to be able to address the raised non-conformity. Therefore, the major non-conformity was closed on 06/09/2023. | | |
| | | | |

| Non-Conformity Report | | | | |
|---|--|--|--|--|
| NCR Ref #: 2355071-202306-N1 Issue Date: 09/06/2023 | | | | |

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| Due Date: | Next Recertification Assessment | Date of Closure: | "Open" |
|--------------------------------|---|---------------------------------------|------------------------------------|
| Area/Process: | Eldred Estate | Clause & Category: (Major / Minor) | MSPO 2530 Part 3: 4.6.1.1 Minor |
| Requirements: | Standard operating procedures shall be appropriately documented and consistently implemented and monitored. | | |
| Statement of Nonconformity: | Monitoring of River Water Quality was not done in accordance with the procedures. | | |
| Objective Evidence: | Eldred Estate There was no evidence that the River Water Sampling was done by an accredited lab. This was not in line with the Boustead Plantations Berhad– Water Sampling Procedure; Issue: 1; Date: Jan 2019; 4.0 Procedure; c) Sampling Methods – And it shall be tested and analyze by accredited lab only. | | |
| Corrections: | Obtain quotations for water sampling analysis. Next, request approval for the quotation. Proceed for water sampling and analysis once the quotation to conduct water sampling from the accredited lab as mentioned in the procedure approved by the Head Office. | | |
| Root cause analysis: | Person in-charge was not well-verse with river water sampling analysis requirement. | | |
| Corrective Actions: | Conduct training to the person in-charge to enhance his/her awareness and knowledge pertaining to river water sampling requirement. | | |
| Assessment Conclusion: | The submitted CAP detailing on proposed actions to be taken to address the raised minor nonconformity, based on the root cause identified were reviewed and deemed to be appropriate. Thus, the effectiveness of the CAP will be verified during the next surveillance assessment. | | |

| Non-Conformity Report | | | | |
|--------------------------------|---|------------------------------------|------------|--|
| NCR Ref #: | 2355071-202306-N2 Issue Date: 0 | | 09/06/2023 | |
| Due Date: | Next Recertification Assessment | Date of Closure: | "Open" | |
| Area/Process: | Bekoh Estate | MSPO 2530 Part 3: 4.3.2.3 Minor | | |
| Requirements: | Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. | | | |
| Statement of Nonconformity: | Legal perimeter boundary markers were not clearly demarcated, maintained and monitored. | | | |
| Objective Evidence: | Bekoh Estate | | | |
| | During the site visit to the estate, the boundary markers could not be identified as the boundary markers were not clearly and visibly demarcated. There was no evidence of documented evidence of the boundary markers available. In addition, there were no evidence of regular monitoring being done at the boundary markers available for verification. | | | |
| Corrections: | 1. Mark the boundary stone location on estate map by including its coordinate. | | | |

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| | 2. Install peg i.e., iron rod, at the boundary stone point and paint the peg with red paint. |
|------------------------|--|
| Root cause analysis: | No person in-charge to monitor, update and maintain the documentations as well as implementation for boundary marker i.e., boundary stone, boundary signage/peg. |
| Corrective Actions: | Appoint person in-charge to monitor, update and maintain the documentations as well as implementation for boundary marker. |
| Assessment Conclusion: | The submitted CAP detailing on proposed actions to be taken to address the raised minor nonconformity, based on the root cause identified were reviewed and deemed to be appropriate. Thus, the effectiveness of the CAP will be verified during the next surveillance assessment. |

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

| Noteworthy Positive Comments | | | |
|------------------------------|--|--|--|
| PF 1 | Good document retrieval | | |
| PF 2 | Generally good application of GAP and Agronomic Practices at all estates. | | |
| PF 3 | Good implementation of Company's Procedures. | | |
| PF 4 | Generally good understanding on OSH and Environmental Conservations by workers and stakeholders. | | |

3.3 Status of Nonconformities Previously Identified and OFI

| Non-Conformity Report | | | | |
|--------------------------------|--|------------------------------------|------------|--|
| NCR Ref #: | 2181828-202203-M1 Issue Date: | | 250/3/2022 | |
| Due Date: | 26/06/2022 | Date of Closure: | 01/06/2022 | |
| Area/Process: | Bekoh Estate | MSPO 2530 Part 3: 4.5.3.3 Major | | |
| 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. | | | |
| Statement of Nonconformity: | Found the estate not proper and safe handling, storage and disposal as per Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974. | | | |
| Objective Evidence: | For Bekoh Estate, found the inventory of scheduled waste was not available. During site verification found the store of scheduled waste was not secure and not followed as per EQA Scheduled waste Regulation 2005 (Reg 9: Storage of Scheduled waste). There also found an empty container in workers housing area. | | | |

| Corrections: | Conduct awareness training on scheduled waste handling and storage. Update scheduled waste inventory as per EQA Scheduled Waste Regulation 2005 (Reg 9: Storage of Scheduled Waste). Repair and maintenance of existing temporary Scheduled Waste Store. | |
|-------------------------|---|--|
| | 4. Collect scheduled waste in workers housing. | |
| Root cause analysis: | No awareness and competency on scheduled waste handling, inventory and storage among workers and estate management personnel. | |
| Corrective Actions: | Include Scheduled waste awareness training in annual training plan and conduct the training annually as per plan. Request Scheduled Waste training from Sustainability & Safety Department for person in-charge Scheduled Waste. | |
| | 3. Upgrade Scheduled Waste storage facility. | |
| Assessment Conclusion: | CAP has been accepted and evidence verified off-site implementation as following:a. Records of scheduled waste training dated 30/3/2022 to workers and contractor workers. | |
| | b. Inventory of scheduled waste dated 30/3/2022. | |
| | c. Picture of Scheduled waste training and scheduled waste store | |
| | All the evidence reviewed found adequate and effectively implemented. Hence, the Major NC was closed on 15/6/2022. | |
| Verification Statement: | During site verification to both the estates, it was found that the store of scheduled waste was well secured and as per EQA Scheduled waste Regulation 2005 (Reg 9: Storage of Scheduled waste). The store was locked, and the Scheduled Waste items were well segregated with required labels. There was no evidence of Scheduled Waste being disposed at the housing | |
| | complex as verified during the visit to both estates housing complex. 3. Nevertheless, the inventory and storage of Scheduled Waste at the estates were not in compliance with Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974. It was verified that the estate did not maintain accurate inventory of its generated scheduled waste. Therefore, the major NC has been reissued due to reoccurrence of the same issue | |
| | under the same indicator. | |

| Non-Conformity Report | | | |
|-----------------------|---|---------------------------------------|------------------------------------|
| NCR Ref #: | 2181828-202203-M2 | Issue Date: | 25/03/2022 |
| Due Date: | 26/06/2022 | Date of Closure: | 01/06/2022 |
| Area/Process: | Eldred and Bekoh Estate | Clause & Category: (Major / Minor) | MSPO 2530 Part 3: 4.5.5.1 Major |
| Requirements: | The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: | | |
| | b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities. | | |

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| Statement of Nonconformity: | Found no monitoring of outgoing water which may have negative impact into natural waterways in Eldred and Bekoh Estate. | |
|--------------------------------|---|--|
| Objective Evidence: | From the HCV report by Malaysian Environmental Consultant dated September 2021, there are HCV for waterways and buffer zone in Bekoh Estate with total 37.58 ha. From the verification, the record of monitoring for outgoing water to natural waterways was not available during audit. | |
| | In Eldred Estate, HCV assessment record showed 43.25 ha for stream and buffer. The management plan 2021 stated that to ensure to conduct water sampling analysis for river in Eldred however no monitoring record for outgoing water (water sampling) which have impact to natural waterways. | |
| Corrections: | Revise and update HCV Management plan on buffer zone management. Obtain quotation for water analysis. Conduct water sampling and send it to be appointed laboratory for analysis to monitor the effect of agricultural activities. Results to be used as baseline value. | |
| Root cause analysis: | No awareness and competency on Water Management among workers and estate management personnel. | |
| Corrective Actions: | Conduct annual waterway monitoring at declared HCV area (waterways and buffer zone) and maintain the record. | |
| Assessment Conclusion: | CAP has been accepted and evidence verified off-site implementation as following: Records of quotation (2022/047/Bekoh Estate) for water analysis and record of and invoice after conducting the water analysis dated 17/4/2022 (Invoice no: TL2022/00082) and for Eldred Estate (Invoice no: Tl2022/0014) dated 22/05/2022. All the evidence reviewed found adequate and effectively implemented. Hence, the | |
| | Major NC was closed on 15/06/2022. | |
| Verification Statement: | The estates have monitored the river water quality of the river due to operations which may have negative impact into natural waterways. 1. <u>Bekoh Estate</u> | |
| | There were 2 water Sampling Points identified for River Water Quality Monitoring. Latest sampling was conducted on 30/03/2023. The assigned laboratory is in the midst of finalising the report. Previous report available was for the year 2022 for the samples taken on 12/04/2022. The Water Quality Analysis Results indicated the pH, COD and AN complied with respective NWQS class IIA and IIB. | |
| | <u>Eldred Estate</u> There were 2 water Sampling Points identified for River Water Quality Monitoring. Latest report available was 20/02/2023. The Water Quality Analysis Results indicated the pH, COD and AN complied with respective NWQS class IIA and IIB. The CAP has been verified to be implemented accordingly, this the major non- | |
| | conformity remains closed. | |

| Non-Conformity Report | | | |
|-----------------------|-------------------|------------------|------------|
| NCR Ref #: | 2181828-202203-N1 | Issue Date: | 25/03/2022 |
| Due Date: | 09/06/2023 | Date of Closure: | 09/06/2023 |

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| Area/Process: | Eldred and Bekoh Estate | Clause & Category: (Major / Minor) | MSPO 2530 Part 3:4.4.5.4 Minor |
|--------------------------------|---|---------------------------------------|-----------------------------------|
| Requirements: | Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. | | |
| Statement of Nonconformity: | Contractor workers ded to legal and industry min | | nt agencies was not according |
| Objective Evidence: | Based on the February 2022 pay slip for contractor workers (BXXXXXX PXXXXXXX EXXXXXX) employee ID number:1. 60XXXX-01-58XXThere was no evidence that contribution to EPF and SOCSO from employer has been made. | | |
| Corrections: | Contractor immediately makes contribution of EPF and SOCSO to that particular employee. (ID number:) 60XXXX-01-58XX. | | |
| Root cause analysis: | Lack of monitoring on contractor's workers' pay slip. | | |
| Corrective Actions: | Engage with contractors and explain MSPO requirement, especially on wages. Monitor EPF and SOCSO contribution by contractors to their workers monthly basis by keeping a copy of EPF and SOCSO contribution at estate office. Monthly basis cross checking of contractor's workers' pay slip with the contribution record provided by contractors. | | |
| Assessment Conclusion: | During document review on salary slips for sample contractors noted that the SOCSO contribution was not documented in the salary slips. Noted during salary slips review found 1 worker with underpaid salary for month of October 2022. Based on the evidence obtained during the assessment, it was verified that the CAP was not effectively implemented. Therefore, the minor non-conformity has been escalated to Major non-conformity under the same indicator. | | |

| Opportunity For Improvement | | | |
|-----------------------------|-----|---------|-----|
| Ref: | N/A | Clause: | N/A |
| Area/Process: | N/A | | |
| Objective Evidence: | N/A | | |
| Verification Statement: | N/A | | |

3.4 Summary of the Nonconformities and Status

| CAR Ref. | Clause & Category (Major / Minor) | Issued Date | Status & Date (Closure) |
|-------------------|--------------------------------------|-------------|-------------------------|
| 1711673-201811-M1 | Major Clause 4.4.4.2 | 24/11/2018 | Closed on 18/02/2019 |
| 1711673-201811-M2 | Major Clause 4.5.3.3 | 24/11/2018 | Closed on 18/02/2019 |
| 1711673-201811-M3 | Major Clause 4.5.6.1 | 24/11/2018 | Closed on 18/02/2019 |

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3.5 Issues Raised by Stakeholders

| IS # | Description | | |
|------|---|--|--|
| 1 | Feedbacks: Tok Batin, Kg. Tanah Gembor | | |
| | He informed that no land encroachment by the company at this moment. The village has good relationship with the management, and he are aware of the complaint procedure of the company. He informed that local communities in the villages are given job opportunities to work in the Bekoh Estate. | | |
| | The village communities used the estate road as passage to their village. He has issue grievances to the estate regarding bridge that have been damage. | | |
| | Management Responses: | | |
| | Noted on the positive comment. As for the bridge, it was not belonged to the estate as the bridge was built by Majlis Daerah Tangkak. The estate has notified the Majlis Daerah Tangkak regarding the issue. | | |
| | Audit Team Findings: | | |
| | Reviewed the complaint book. No further issues. | | |
| 2 | Feedbacks: Ketua Kampung, Kg. Bekoh | | |
| | He informed that no land encroachment by the company at this moment. He hopes to maintain the good relationship with the management. The estate continuously give contribution to the village when requested. | | |



| | He is aware of the complaint procedure of the company as have been brief during stakeholders' consultation meeting. He informed that local communities in the villages are given job opportunities to work in the Bekoh Estate. |
|---|---|
| | Management Responses: |
| | Noted on the positive comment. |
| | Audit Team Findings: |
| | Reviewed the stakeholder's consultation minutes meeting. No further issues. |
| 3 | Feedbacks: NUPW Representative |
| | They informed that they were elected by the workers through election. They have meeting with the management to discuss any issues related to workers. All the issues reported were taken action by the management and resolved accordingly. The workers can discuss with the management on any work related and social issue with the management freely. No issues of discrimination in the estate. The workers were assigned for jobs base on their skills. The workers are free to join the NUPW. |
| | Management Responses: |
| | Noted on the positive comment. |
| | Audit Team Findings: |
| | Reviewed the NUPW minutes meeting, SIA management plan. No further issues. |
| 4 | Feedbacks: Foreign Workers Representative (Estate) |
| | They informed that the management treated everyone equally without discrimination. Their wages are paid accordance to Employment Act 1955 and latest Minimum Wage Order. They have the rights to join any association. The estate conducted Social Dialogue Meeting biweekly. The workers can discuss with the management on any work related and social issue with the management freely. The workers were aware on the complaints and grievances channel. |
| | Management Responses: |
| | Noted on the positive comment. The management will ensure the compliance of regulations and respect the rights of workers. |
| | Audit Team Findings: |
| | Reviewed the payslips for all sampled workers found all the workers were paid as per the legal requirements. No further issues. |
| 5 | Feedbacks: Female Workers (Gender Committee) |
| | They informed that the management treated the female workers equally with male workers. No discrimination occurred. The female workers were given opportunity on promotion of work based on work performance and capability. They also informed that no case of sexual harassment and domestic violence reported. They are aware on the reporting channel if any case of sexual harassment and domestic violence occur in the estate. |
| | Management Responses: |
| | Noted on the positive comment. |
| | Audit Team Findings: |
| | Reviewed the payslips, employment contracts and records of meeting minutes of Gender Committee confirmed that no discrimination and sexual harassment reported. |
| 6 | Feedbacks: Contractors |
| | They informed that they have signed contract agreement with Boustead Plantations prior to provide services. They also have been briefed on the contracts and the code of business conducts prior to the |



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contract signing. The terms and conditions have clearly stated in the agreement included the payment term. The payment was made promptly. The estates continuously conducted due diligence monitoring to the contractors.

Management Responses:

Noted on the positive comment.

Audit Team Findings:

Reviewed the due diligence reports, contract agreements, signed and understand by the contractors. No further issues.

3.6 List of Stakeholders Contacted

| Government Officer: - | Community/neighbouring village: 1. Kg. Bekoh 2. Kg. Tanah Gembor |
|--|--|
| Suppliers/Contractors/Vendors: | Worker's Representative/Gender Committee: |
| 1. BXXXXXX PXXXXXXXX EXXXXXXXX | 1. Internal NUPW Representatives |
| 2. DXXXXX TXXXXXX AXX SXXXXXX SXX BXX. | 2. Gender Committee |
| 3. PXXXXXXXX YXXXX MXXXX | 3. Local worker |
| 4. SXXXXX AXXXXXXX | 4. Foreign worker |



Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings Based on the findings during the assessment Eldred Estate and Bekoh Estate Certification Unit complies with the

Based on the findings during the assessment Eldred Estate and Bekoh Estate Certification Unit complies with the MS 2530-3:2013. It is recommended that the certification of Eldred Estate and Bekoh Estate Certification Unit is approved and continued.

| Acknowledgement of Assessment Findings | Report Prepared by |
|--|---------------------------------|
| Name: | Name: |
| MITAH BINTI LIMPU | VIJAY KANNA PAKIRISAMY |
| Company name: | Company name: |
| BOUSTEAD PLANTATIONS BERHAD | BSI SERVICES (MALAYSIA) SDN BHD |
| Title: | Title: |
| SUSTAINABILITY EXECUTIVE | CLIENT MANAGER |
| Signature: | Signature: |
| limitin | ALEMMA |
| Date: 18/09/2023 | Date: 14/09/2023 |



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 | | | | |
| Criterio | n 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 - | Boustead Plantations Berhad has established the BPB Sustainability Policy dated 12/07/2021 signed by the Chief Executive Officer. The policy available in the company's website as per link as following: <u>https://www.bousteadplantations.com.my/wp-</u> <u>content/uploads/2022/06/BPB-Sustainability-Policy.pdf</u> The policy was communicated to the external stakeholders during meeting conducted at minimum of once a year. Reviewed the minutes meeting, PowerPoint slide presentation for meeting conducted 30/05/2023 (external) and 01/03/2023 (internal) for Bekoh Estate and 26/01/2023 (external) and 30/01/2023 (internal) for Eldred Estate. | Complied | |
| 4.1.1.2 | The policy shall also emphasize commitment to continual improvement. - Major compliance - | The policy emphasized the commitment of continuously improve the effectiveness of quality management system for company's traceability and transparency of supply chain. The policy also emphasized commitment of continuous stakeholder engagement that strive to continue to be an active supporter of the sustainability initiative and will work to strengthen MSPO standards and adherence to it. The policy is based on the following guiding principle. To certify our Business Unit with Sustainability associated certification. | Complied | |

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| | | - To comply with all applicable federal and state laws and codes of practice. | |
| | | - To adopt the Principle and Criteria of Sustainability associated certification as the foundations for our sustainability practices. | |
| | | - To implement sustainability standards laid out in this policy for environmental development and social impact, traceability, and transparency of supply chain, ensuring that all suppliers comply with our commitments as stated in this Sustainability Policy. | |
| Criterio | n 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 - | The MSPO internal audit was planned to be conducted annually, in accordance with the Internal Audit Procedure (Boustead Plantations – Internal Audit Procedure; Issue; 1; Date of Issue: July 2016; Revision Date: 24/05/2022; Revision: 2). Internal audit was conducted by Boustead Plantations Berhad HQ - Sustainability & Safety Department. Internal audit was conducted at both estates (Bekoh Estate and Eldred Estate) on 01-28 – 31/03/2023 with total of eleven (14) nonconformances raised. | Complied |
| 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 (Boustead Plantations – Internal Audit | Complied |



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Compliance **Criterion / Indicator Assessment Findings** of non-conformances, investigation result & root cause analysis, correction/corrective action, and corrective action plan. Report shall be made available to the management for their Complied 4.1.2.3 The Internal Audit Report were emailed to both estates by the review. Sustainability and Safety Department for their review. Verified the email dated 03/04/2023. Report of internal audit were reviewed in the - Major compliance -Management Review Meeting as per minutes of meeting records dated 31/03/2023. Criterion 4.1.3 – Management Review 4.1.3.1 The management shall periodically review the continuous The Management Review were guided by the Supply Chain and Complied suitability, adequacy and effectiveness of the requirements for Traceability Procedure (SOP Number: SSD/01/SCT-01; Dated effective implementation of MSPO and decide on any changes, 25/01/2022). The procedure states that the Management Review is to be held at planned internals (Once a Year). MSPO Management Review improvement and modification. was conducted simultaneously for Eldred Estate and Bekoh Estate on - Major compliance -31/03/2023. The management review minutes meeting was available for verification. The meeting mainly discussed on the Internal Audit that had just been conducted in both the estates. Among agenda discussed were: 1. MSPO Certification Status 2. MSPO Supply Chain Status 3. Results of Internal Audit 4. Customer Feedback 5. Preventive and Corrective Action Status 6. Recommendation for Improvement 7. Complain and Grievances 8. Resources Needed

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| | | 9. Any Other Business | |
| Criterio | 1 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 - | Eldred Estate and Bekoh Estate have developed a Continuous Improvement Plan, available in the Environmental management Programme (EMP) for the Year 2023 and Social Impact Mitigation Plan. Among the improvements that have been identified are: <u>Bekoh Estate</u> 1. To ensure the slope/ terracing area is minimum or free of facing soil erosion. 2. To ensure zero application of highly toxicity pesticide or herbicides. 3. To minimize soil destruction and reduce frequency of chemicals and fertilizer application. 4. To substitute chemical to cultural and biological practices. 5. Workers Housing - To repair and renovate those damaged doors. Windows and toilets. 6. Healthcare – to provide medical checkup once in 4 months for workers. <u>Eldred Estate</u> 1. To ensure no illegal hunting activities inside or outside the estate perimeter in line with the protection of Wildlife Act 1972. 2. To ensure good quality and healthy waterways by continuously establishing and enhancing the estate buffers. 3. To minimize erosion at slope and terrace areas by planting LCC and construction of silt pits. | Complied |

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| | | To ensure the slope/ terracing area is minimum or free of facing soil erosion. To ensure zero application of highly toxicity pesticide or herbicides. To minimize soil destruction and reduce frequency of chemicals and fertilizer application. | |
| | | 7. Estate house repairing and renovation programme to be carried out. | |
| 4.1.4.2 | The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption. - Major compliance - | This is being made upon confirmation of any new projects. Employees were briefed of any new development in basic understanding during the weekly briefings. The management team will be informed of such development during the monthly management meetings. Dissemination of information by the General Manager are transacted during the monthly Managers meetings and emails. | Complied |
| 4.1.4.3 | An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. - Major compliance - | Where introduction of new machines and new work method, all level of employees will be trained to handle /implement the new techniques and work changes. Monitoring is made by the Estate Managers and Assistants throughout the on-the-job training and familiarization. | Complied |
| 4.2 Prin | ciple 2: Transparency | | |
| Criterio | n 4.2.1 – Transparency of information and documents releva | nt 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. | Boustead Plantations Berhad has established BPB Sustainability Policy, dated 12/07/2021 that includes the transparency commitment. Internal and external stakeholder communication on policies were done based on request of information by any stakeholder. | Complied |

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| | - Major compliance - | Boustead Plantations Berhad has established Grievances Procedure, rev. 0 dated 01/03/2022. Refer doc. no. HR/2022/023/003. The procedure has outlined the communication procedure in the Flow Chart for Grievances Procedure. | |
| | | The consultation and communication were conducted through stakeholder meeting, dialogs, request letter, feedbacks letter phone call between the operating units and stakeholder (internal and external). Reviewed the minutes meeting, PowerPoint slide presentation for meeting conducted 30/05/2023 (external) and 01/03/2023 (internal) for Bekoh Estate and 26/01/2023 (external) and 30/01/2023 (internal) for Eldred Estate. | |
| 4.2.1.2 | Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. - Major compliance - | Both estates Unit holds copies of each of the management documents that are required to be publicly available. Copies of the document such as documents related to environmental and social issues, plans for pollution prevention, records of complaints and grievances were available upon request in the estates. All the policies such as Sustainability Policy, Quality Policy, Safety and Health Policy and Electrical Safety Policy were properly documented and publicly available in the company's website as well as other sustainability information practiced by the company. Refer: <u>https://www.bousteadplantations.com.my/sustainability-approach- policies/</u> | Complied |
| 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 - | Boustead Plantations Berhad has established Grievances Procedure, rev. 0 dated 01/03/2022. Refer doc. no. HR/2022/023/003. The | Complied |

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| Criterion / Indicator | | Assessment Findings | Compliance |
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| | | procedure has outlined the communication procedure in the Flow Chart for Grievances Procedure. | |
| | | The estates communicated the procedure to the internal and external stakeholders during Stakeholders Consultation Meetings conducted on annually basis. Reviewed the minutes meeting, PowerPoint slide presentation for meeting conducted 30/05/2023 (external) and 01/03/2023 (internal) for Bekoh Estate and 26/01/2023 (external) and 30/01/2023 (internal) for Eldred Estate. | |
| 4.2.2.2 | A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. - Minor compliance - | Bekoh EstateThe estate has established the Social and Communication Panel as per appointment letter dated 01/01/2023 signed by the Estate Manager.Eldred EstateThe estate has appointed the Sustainability Staff as person responsible for communication, consultation, and grievances as per appointment letter dated 15/01/2023 signed by the Estate Manager. | Complied |
| 4.2.2.3 | List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. - Major compliance - | The list of internal and external stakeholders maintained with | Complied |



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| 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 - | SOP on Traceability of FFB Production was detailed out in the Supply Chain and Traceability Procedure (SOP Number: SSD/01/SCT-01) which was established dated 25/01/2022. Eldred Estate and Bekoh Estate sends their FFB to Telok Sengat POM. Weighbridge tickets were available for verification and maintained for traceability of all FFBs sent to the mill. Weighbridge tickets were sampled for the estates. | |
| 4.2.3.2 | The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance - | Traceability Inspection was carried out on monthly basis by the Estate Management at the respective estates. The inspections are done to ensure the traceability system is well implemented. The inspection is documented in the "FFB Traceability Checklist – Manual Loading Conventional System". The details of the records show the traceability process being monitored from estate field to the mill. Sighted the traceability audit report for both estates dated for January 2023 – May 2023. | Complied |
| 4.2.3.3 | The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance - | Bekoh Estate and Eldred Estate have identified and appointed their employee to be responsible for the traceability of the FFB from the estate to the mill. <u>Bekoh Estate</u> The management has appointed Ms. Norazelah Binti Ahmad as the Traceability of FFB Representative for the estate as stated in the appointment letter dated 04/01/2023 undersigned by the Estate Manager. <u>Eldred Estate</u> The management has appointed Mr. Saiful Bin Amir as the Traceability of FFB Representative for the estate as stated in the appointment letter dated 21/01/2023 undersigned by the Estate Manager. | Complied |



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|----------|--|---|---|--|------------|
| 4.2.3.4 | A.3.4 Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance - Delivery of FFB from Eldred Estate and Bekoh Estate from field to Sengat POM was monitored closely by the estate manager Sighted the records of delivery or transportation of FFB. These records are maintained, and the documents are kept by the estates and the states and the state of the sta | | | / the estate management. tation of FFB. These records | Complied |
| | | <u>Estate</u> | Bekoh Estate | Eldred Estate | |
| | | <u>Date</u> | 03/05/2023 | 26/02/2023 | |
| | | Product | FFB | FFB | |
| | | Ticket Number | LB 5865 | S0004853/54 | |
| | | Nett Weight | 33,160 Kg | 41,000 Kg | |
| | | Vehicle Number | JPL 3227 | AMQ 7758 | |
| | | | | | Compliad |
| Criterio | All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. Major compliance - | requirements. Comp monitored by the ope | liance to each appli erating units and sus | • | Complied |
| | | The operating units had obtained and renewed license and permits required by the law. Among others the licenses/permit viewed were follows: | | | |
| | | Bekoh Estate | | | |
| | | Permit for Scheduled Controlled Goods, Diesel Purchase ar Storage permit no. MR/PD/SK-0380 @ SKS 89 valid t 11/06/2024. | | | |
| ł | | 2. MPOB License no | o. 616049002000 vali | d till 31/07/2023. | |
| | | 3. Worker's deduct 13/03/2019. | tion permit ref. no | o. TK(NJ) U – 25 dated | |

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| | | <u>Eldred Estate</u> MPOB License no. 504635402000 valid till 31/12/2023. Weighbridge calibration certificate no. B1904675 with safety sticker no. 1.4K Q014079 dated 08/11/2022. Salary deduction permit for electricity and water supply with approval letter ref. no. TK (NJ) U-24 dated 12/08/2018. Permit for Scheduled Controlled Goods, Diesel Purchase and Storage permit no. JH(SGT) 0042/99 PSK valid till 05/11/2023. | |
| 4.3.1.2 | The management shall list all laws applicable to their operations in a legal requirements register. - Major compliance - | All operating units have Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. Reviewed the latest Legal & Other Requirements Register (LORR) dated 06/01/2023. Among the latest update in the register as follow: 1. Occupational Safety and Health (Amendment) Act 2022 2. Employment Act (Amendment) Act 2022 3. Anti-Sexual Harassment Act 2022 | 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 - | Tracking system available to identify changes in the relevant regulations through head office, sustainability team, website information and the information are communicated from the Head Office (Sustainability Section). Boustead Plantations Berhad have centralized system for tracking any changes in the law and subscribe into Lawnet. | 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 - | Boustead Plantations Berhad has appointed the Manager from Sustainability and Safety Department to update the operating units for any changes on law and other requirement. Bekoh Estate and Eldred Estate has appointed the Sustainability Staffs as person responsible to update the legal and other requirements as | Complied |


Criterion / Indicator Assessment Findings Compliance per appointment letter dated 01/01/2023 and 29/01/2023 respectively signed by the Estates Manager. Criterion 4.3.2 – Lands use rights 4.3.2.1 The management shall ensure that their oil palm cultivation There was no evidence to show that oil palm cultivation activities at Complied the sampled estates had diminished the land use rights of others. activities do not diminish the land use rights of other users. Verified documents to show legal ownership of its land. - Major compliance -The management shall provide documents showing legal Verified the land titles shown that the legal ownership of the company. 4.3.2.2 Complied ownership or lease, history of land tenure and the actual use of Sample of land title as below: the land. Bekoh Estate - Major compliance -Title no. Lot no. 21XXXX Lot 208 The estate paid the guit rent on annually basis. Reviewed the latest payment FY 2023 as per receipt no. F0913746. Eldred Estate Title no. Lot no. 537 11XXXX 538 11XXXX 11XXXX 534 11XXXX 536 9XXXX 542 9XXXX 540 98XXXX 461 The estate paid the quit rent on annually basis. Reviewed the latest payment FY 2023 as per receipt no. G0010854, G0010855, G0010856, G0010857, G0010858, G0010859 and G0010860.

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| Criterio | on / Indicator | Assessment Findings | Compliance | |
|----------|---|--|------------------------|--|
| 4.3.2.3 | Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance - | | Minor Noncompliance | |
| 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 - | land belongs to Boustead Plantations and land ownership documents | NA | |
| Criterio | n 4.3.3 — Customary rights | | | |
| 4.3.3.1 | Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. | through interviewed with the smallholders and local communities. | NA | |
| | - Major compliance - | The estate legal boundary was clearly demarcated. The company has constructed trenches, wooden pegs and gates to differentiate the land | | |

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|-----------------------|--|---|------------|
| | | boundaries. No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during as of the time of audit. | Completion |
| 4.3.3.2 | Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance - | The estate lands are legally owned by the company. There is no customary land encumbrance in the estates at the time of audit verified through interviewed with the smallholders and local communities. The estate legal boundary was clearly demarcated. The company has constructed trenches, wooden pegs, and gates to differentiate the land boundaries. No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during as of the time of audit. | NA |
| 4.3.3.3 | Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance - | The estate lands are legally owned by the company. There is no customary land encumbrance in the estates at the time of audit verified through interviewed with the smallholders and local communities. The estate legal boundary was clearly demarcated. The company has constructed trenches, wooden pegs, and gates to differentiate the land boundaries. No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during as of the time of audit. | NA |
| 4.4 Prin | ciple 4: Social responsibility, health, safety and emplo | oyment condition | |
| Criterio | n 4.4.1: Social Impact Assessment (SIA) | | |
| 4.4.1.1 | Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance – | Social impact assessment for both sample estates has been conducted by Malaysian Environmental Consultants Sdn. Bhd. as per report entitled Social Impact Assessment, Boustead Plantations Berhad dated | Complied |



| Criterio | on / Indicator | Assessment Findings | Compliance |
|----------|--|--|------------|
| | | 29/06/2018. Base on the findings identified during the assessment and feedbacks | |
| Criterio | n 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 - | Boustead Plantations Berhad has established Grievances Procedure, rev. 0 dated 01/03/2022. Refer doc. no. HR/2022/023/003. The procedure has outlined the communication procedure in the Flow Chart for Grievances Procedure. | 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 - | The procedure has outlined the communication procedure in the Flow Chart for Grievances Procedure. In the flowchart established stated the timeline to resolve the complaints and grievances received. Noted during document review, most of the complaint and grievances were regarding housing and building repairs. The complaints and grievances we resolved in timely manners with acknowledgement from the complainants. Reviewed the sampled of complaints and grievances as follows: Housing repair request for house no. 58A and 58B dated 31/05/2023 and resolve on 06/06/2023. Building repair request for shops dated 17/05/2022 and resolve on 18/05/2023. Housing repair request for house no. 54B dated 18/05/2023 and resolve on 19/05/2023. Housing repair request for house no 30A dated 08/02/2023 and resolve on 11/02/2023 | Complied |



| Criterio | on / Indicator | Assessment Findings | Compliance |
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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 a complaint. - Minor compliance - | As per Grievances Procedure, rev. 0 dated 01/03/2022 in Appendix 1 Grievances Form. The form was available at the estate's office upon request by the stakeholders. The form is implemented to record any complaints from the stakeholders. The estates management has taken action to rectify the complaints and updated the actions taken in the form. The complainant has acknowledged on the complaint form after the issue has been resolved by the estate management. | 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 - | Employees were made aware on the complaints and grievances through various ways such as monthly meeting, periodical training, and daily/weekly briefing. The internal and external stakeholders were informed about the mechanism of complaints management through stakeholders' consultation meeting. Reviewed the minutes meeting, PowerPoint slide presentation for meeting conducted 30/05/2023 (external) and 01/03/2023 (internal) for Bekoh Estate and 26/01/2023 (external) and 30/01/2023 (internal) for Eldred Estate. | Complied |
| 4.4.2.5 | Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance - | Record review found that previous complaints and requests for the past 24 months were still available. | Complied |
| Criterio | n 4.4.3: Commitment to contribute to local sustainable devel | opment | |
| 4.4.3.1 | Growers should contribute to local development in consultation with the local communities Minor compliance - | The operating units continues contribute to the local communities. Among the contributions in FY 2022/23 as follows: <u>Bekoh Estate</u> 1. Contribution to workers and staff for Hari Raya dated 19/04/2023. | Complied |

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| | | Contribution for workers and staff affected by flood dated 04/03/2023. <u>Eldred Estate</u> Assist to grass cutting at surrounding area of Sekolah Agama Bekok dated March 2022. Gotong royong at Masjid dated May 2022. Monetary contribution to SJKT Bekok for activity and beautification program dated 20/03/2023. | |
| Criterio | n 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 - | Boustead Plantations Bhd has established Safety and Health Policy signed by the Chief Executive Officer (CEO) dated 12/07/2021. The policy states the company's commitment towards ensuring and promoting a safe work environment for the workers and operations. The policy was communicated through trainings, briefings and displayed on notice boards. The estates have established Occupational Safety and Health Action Plan 2023. The management plan includes the OSHA Meetings, | Major Non- compliance |
| | | Trainings, PPE Usage and Emergency Response Plans among others. <u>Eldred Estate</u> 1. The NRA Report (Document Number: N087/2022 – 014) has recommended that the Tractor Driver, Mechanic, Carabao Driver and Grass Cutter to undergo Audiometric Test every year. There was no evidence of the audiometric test being conducted for the | |
| | | 2. The Oxygen and Acetylene tanks used for welding works at the estate were not equipped with Flashback Arrestors. The risk | |

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| | | associated to leakage were not adequately assessed in the HIRARC. <u>Bekoh Estate</u> 1. During the field visit at Bekoh Estate, it was sighted that there were 2 tractor drivers not wearing appropriate PPE (Safety Helmet) while driving the tractors. This was not in line with the HIRARC for Tractor Drivers. Thus, Major Non-compliance were raised. | |
| 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. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety | The occupational safety and health plan cover the following: a. Boustead Plantations Bhd has established Safety and Health Policy signed by the CEO dated 12/07/2021. In the policy stated the company's commitment to ensure and promote the safety work environment for the workers and operations. The policy was communicated through training, briefing, and displayed on notice board. Latest Safety and Health Policy training was conducted on 20/02/2023 at Bekoh Estate. b. The procedure for HIRARC was established in the document Sustainability & Safety Department SOP – HIRARC Procedure; SOP Number: SSD/03/HRP – 02; Effective Date: 25/01/2023; Revision: 02. HIRARC was available for all operations within the estates to identify the hazards, assess and recommended control measures to minimize the risks. Among the HIRARC sampled were Harvesting, Spraying, Manuring and Creche. Chemical Health Risk Assessment (CHRA) was conducted in compliance with Occupational Safety and Health (USECHH) regulation 2000. | Complied |

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| Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. 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. 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. h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees. 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. j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals. Major compliance - | Bekoh Estate CHRA was conducted on 02/11/2018 by ENV Consultancy & Monitoring Services Sdn Bhd. The CHRA Report (Reference Number: HQ/04/ASS/00/193 – 2018/038) was available for verification. Eldred Estate CHRA was conducted on 02/11/2018 by ENV Consultancy & Monitoring Services Sdn Bhd. The CHRA Report (Reference Number: HQ/04/ASS/00/193 – 2018/079) was available for verification. Medical Surveillance was conducted to establish workers health status when they work in an environment where they are exposed to hazardous chemicals. Medical Surveillance was conducted for 20 workers in Bekoh Estate, deemed to be exposed to chemicals and fumes. The medical surveillance was conducted at UNI Klinik, Permas Jaya. The results indicated that all workers were fit to work with no occupational related concerns. Medical Surveillance was conducted for 12 workers in the estate, deemed to be exposed to chemicals and fumes. The medical surveillance was conducted for 12 workers in the estate, deemed to be exposed to chemicals and fumes. The medical surveillance was conducted for 12 workers in the estate, deemed to be exposed to chemicals and fumes. The medical surveillance was conducted in compliance with occupational related concerns. Moise Risk Assessment was conducted in compliance with Occupational Health and Safety Regulations (Noise) 2019. NRA was conducted by Handstech Solution Services Sdn Bhd on 10/02/2022 for Bekoh Estate. The Baseline Assessment Report (Document Number: N087/2022 – 013) was available for verification. | |

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| NRA was conducted by Handstech Solution Services Sdn Bhd on 12/02/2022 for Eldred Estate. The Baseline Assessment Report (Document Number: N087/2022 – 014) was available for verification. The estates have established a training and awareness program for employees exposed to chemicals used at the estate to ensure continuous awareness to the employees. The training was conducted by the Manager, Asst. Manager and representative form the chemical suppliers to the supervisors and operators. Bekoh Estate Chemical Handling and Management Training – 13/02/2023 Chemical Premixing and Chemical Handling Training – 28/04/2023 Eldred Estate Spraying Training – 18/05/2023 Chemical Premixing Training – 18/05/2023 P&D Spraying Training – 18/05/2023 Chemical Premixing Training – 18/05/2023 <l< th=""><th>Criterion / Indicator</th><th></th><th>Assessment Findings</th><th>Compliance</th></l<> | Criterion / Indicator | | Assessment Findings | Compliance |
|--|-----------------------|----|---|------------|
| for employees exposed to chemicals used at the estate to ensure continuous awareness to the employees. The training was conducted by the Manager, Asst. Manager and representative form the chemical suppliers to the supervisors and operators. <u>Bekoh Estate</u> - Chemical Handling and Management Training – 13/02/2023 - Chemical Premixing and Chemical Handling Training – 28/04/2023 <u>Eldred Estate</u> - Spraying Training – 18/05/2023 - Chemical Premixing rraining – 08/02/2023 (d. The estates have provided appropriate PPE to all workers according to the job type and requirements. The PPE given as per HIRAC requirements. Sighted the PPE issuace records documented in 'PPE Issuance Record' logbook. The PPE issuad recorded by workers and job designation. e. Procedures of chemical handling is presented in several documents, such as: - Chemical Handling Management; Issue: 01; Date of Issue: 11/10/2019. | | | NRA was conducted by Handstech Solution Services Sdn Bhd on 12/02/2022 for Eldred Estate. The Baseline Assessment Report (Document Number: N087/2022 – 014) was available | |
| Chemical Handling and Management Training – 13/02/2023 Chemical Premixing and Chemical Handling Training – 28/04/2023 Eldred Estate Spraying Training – 18/05/2023 P&D Spraying Training – 11/04/2023 Chemical Premixing Training – 08/02/2023 The estates have provided appropriate PPE to all workers according to the job type and requirements. The PPE given as per HIRARC requirements. Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation. Procedures of chemical handling is presented in several documents, such as: Chemical Handling Management; Issue: 01; Date of Issue: 11/10/2019. Date of Issue: 11/10/2019. | | c. | for employees exposed to chemicals used at the estate to ensure continuous awareness to the employees. The training was conducted by the Manager, Asst. Manager and representative form | |
| Chemical Premixing and Chemical Handling Training – 28/04/2023 Eldred Estate Spraying Training – 18/05/2023 P&D Spraying Training – 11/04/2023 Chemical Premixing Training – 08/02/2023 The estates have provided appropriate PPE to all workers according to the job type and requirements. The PPE given as per HIRARC requirements. Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation. Procedures of chemical handling is presented in several documents, such as: Chemical Handling Management; Issue: 01; Date of Issue: 11/10/2019. | | | Bekoh Estate | |
| 28/04/2023 Eldred Estate - Spraying Training – 18/05/2023 - P&D Spraying Training – 11/04/2023 - Chemical Premixing Training – 08/02/2023 d. The estates have provided appropriate PPE to all workers according to the job type and requirements. The PPE given as per HIRARC requirements. Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation. e. Procedures of chemical handling is presented in several documents, such as: - Chemical Handling Management; Issue: 01; Date of Issue: 11/10/2019. | | | Chemical Handling and Management Training – 13/02/2023 | |
| Spraying Training – 18/05/2023 P&D Spraying Training – 11/04/2023 Chemical Premixing Training – 08/02/2023 The estates have provided appropriate PPE to all workers according to the job type and requirements. The PPE given as per HIRARC requirements. Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation. Procedures of chemical handling is presented in several documents, such as: Chemical Handling Management; Issue: 01; Date of Issue: 11/10/2019. | | | | |
| P&D Spraying Training – 11/04/2023 Chemical Premixing Training – 08/02/2023 The estates have provided appropriate PPE to all workers according to the job type and requirements. The PPE given as per HIRARC requirements. Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation. Procedures of chemical handling is presented in several documents, such as: Chemical Handling Management; Issue: 01; Date of Issue: 11/10/2019. | | | Eldred Estate | |
| Chemical Premixing Training – 08/02/2023 d. The estates have provided appropriate PPE to all workers according to the job type and requirements. The PPE given as per HIRARC requirements. Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation. e. Procedures of chemical handling is presented in several documents, such as: Chemical Handling Management; Issue: 01; Date of Issue: 11/10/2019. | | | Spraying Training – 18/05/2023 | |
| d. The estates have provided appropriate PPE to all workers according to the job type and requirements. The PPE given as per HIRARC requirements. Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation. e. Procedures of chemical handling is presented in several documents, such as: Chemical Handling Management; Issue: 01; Date of Issue: 11/10/2019. | | | P&D Spraying Training – 11/04/2023 | |
| according to the job type and requirements. The PPE given as per HIRARC requirements. Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation. e. Procedures of chemical handling is presented in several documents, such as: Chemical Handling Management; Issue: 01; Date of Issue: 11/10/2019. | | | Chemical Premixing Training – 08/02/2023 | |
| documents, such as: – Chemical Handling Management; Issue: 01; Date of Issue: 11/10/2019. | | d. | according to the job type and requirements. The PPE given as per HIRARC requirements. Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued | |
| 11/10/2019. | | e. | - , | |
| – Prosedur Kerja Selamat – Campuran Bahan Kimia Berbahaya; | | | | |
| | | | – Prosedur Kerja Selamat – Campuran Bahan Kimia Berbahaya; | |

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| | | Document Date: 20/06/2019. – Prosedur Kerja Selamat – Meracun; Document Date: 12/03/2011. | |
| | f. | The Estate manager of the respective estates were appointed to be the Safety and Health Committee Chairman at the estates as stated in the appointment letters undersigned by the Head of Business Unit, Occupational Safety and Health Committee. Estate management has appointed Safety Committee Members consists of OSH Coordinator, Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate Manager. | |
| | g. | The Estate Management conducted regular OSH committee meetings on bimonthly basis and when necessary due to accidents that occur. In the meeting, discussed issue on employees' safety, health, and welfare such as estate safety and health achievement report, estate security, safety compliance by contractors, workplace inspection, legal compliance, safety, and health training. | |
| | | Bekoh Estate conducted regular Safety and Health Committee Meetings. Sighted the latest Meeting Minutes dated 01/06/2023, 01/03/2023, 18/11/2022 and 22/09/2022 available for verification. | |
| | | Eldred Estate conducted regular Safety and Health Committee Meetings. Sighted the latest Meeting Minutes dated 22/03/2023, 21/12/2022, 08/09/2022 and 25/06/2022 available for verification. | |
| | h. | Emergency Response Team has been established at both estates. The ERT Team organization chart were available for verification. | |

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| Criterion / Indicator | Assessment Findin | ngs Ca | Compliance |
|-----------------------|---|--|------------|
| Criterion / Indicator | Assessment Findin The ERP has been established to including pillage, Accident, first aid among others in the estate has established Emergency Restate Managers. Fire Drill Training was is below. Fire Drill and Awareness Training coord on 23/01/2023. Fire Drill and Awareness Training coord on 30/05/2023. Fire Drill and Awareness Training coord on 30/05/2023. First aiders were present at various operations/team assigned to them by the id box was recently replenished withonitoring available for verification. Bekoh Estate: There were 3 certified The first aiders underwent training Aid and Cardiopulmonary Resuscitate the certificate valid for 3 years. The F trained on the first aid box usage available date 06/04/2023. Eldred Estate: There were 6 certified The first aiders underwent training Aid and Cardiopulmonary Resuscitate the certificate valid for 3 years. The F trained on the first aid box usage available date 06/04/2023. | de Fire, Flood, Chemical s. esponse Team lead by the conducted at the estates onducted at Bekoh Estate onducted at Eldred Estate rations at the estate. The first aid box at each he management. The first ith records of monthly I first aiders at the estate. the Introduction to First tion on 14/12/2021 with First Aid Box Holders were with records of training I first aiders at the estate. the Introduction to First tion on 14/12/2021 with First Aid Box Holders were | Compliance |
| | ccident records are recorded and main liscussed during the bimonthly held JKK | | |

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| Criterio | on / Indicator | Assessment Findings | Compliance |
|----------|---|--|------------|
| | | Bekoh Estate reported no accident cases for the year 2022. The JKKP 8 Form for the year ending 2022 has been submitted to DOSH on 27/01/2023. As for the year 2023 there were 2 incidents with no lost days reported in the estate. There was no accident reported for the year 2022 in the estate. Sighted the JKKP 8 form submission to JKKP for the year 2022 as well. There were no injuries reported at the estates for the year 2023 as of to date. | |
| Criterio | n 4.4.5: Employment conditions | | |
| 4.4.5.1 | The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees. - Major compliance - | Boustead Plantations Berhad has established the BPB Sustainability Policy dated 12/07/2021 signed by the Chief Executive Officer. | Complied |
| | | Under section 2. Recognize the Right of All Employees, the policy stated the company commitment on: | |
| | | 2.1. No Exploitation of People | |
| | | 2.2. Respect Human Rights | |
| | | 2.3. Safety and Health | |
| | | The policy available in the company's website as per link as following: <u>https://www.bousteadplantations.com.my/wp-</u> <u>content/uploads/2022/06/BPB-Sustainability-Policy.pdf</u> | |
| 4.4.5.2 | The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment | the Chief Executive Officer. | Complied |
| | regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing | Under section 2. Recognize the Right of All Employees, the policy stated the company commitment on: | |
| | characteristics. - Major compliance - | 2.2.3. Provide fair and equal employment opportunities regardless race, nationality, religion, or gender, and practice no contract | |



| Criterio | n / Indicator | | Assessment Find | lings | Compliance |
|----------|--|---|--|-------|------------------------|
| | | based on business ne | substitution. Training and development opportunities are provided based on business need, job requirements and individual qualification to ensure that employees are able to utilize their full potential. | | |
| 4.4.5.3 | Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance - | conditions as per employment contract | | | |
| | | 1. 0624J 2. 0625G | General Workers 3. 0529D 4. 0530D 5. 0545B 6. 0594J 7. 0618E 8. 0621I | | |
| | | Eldred Estate | | | |
| | | Harvester 1. 0194 2. 0204 3. 0201 4. 0198 | General Workers 5. 0136 6. 0073 7. 0084 8. 0039 9. 0182 10. 0181 | | |
| 4.4.5.4 | Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. | All contractors' workers salary payments were monitored by the estates to ensure the contractors workers were paid based on legal or industry minimum standards. The contractors were required to submit all the worker's salary slips for review. | | | Major Noncompliance |

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| Criterio | n / Indicator | Assessment Findings | Compliance |
|----------|--|---|------------|
| | - Minor compliance - | <u>Bekoh Estate</u> Reviewed the employment agreement, attendance records and salary slip for the month of June 2022, October 2022 and March 2023 for the workers with C 817XXXX and C 817XXXX. 1. During document review on salary slips for sample contractor's workers with passport no. C 817XXXX and C 817XXXX for the month of June 2022, October 2022 and March 2023, noted that the SOCSO contribution was not documented in the salary slips. 2. Noted during salary slips review, 1 worker with underpaid salary for month of October 2022. Details as follows: Worker's passport no: C 817XXXX Working day: 25 days Salary that should be paid: RM 57.69 x 25 = RM 1,442.25 Actual Salary paid: RM 1415.22 Different: RM 27.03 | |
| | | Eldred Estate Reviewed the employment agreement, attendance records and salary slip for the month of June 2022, October 2022 and March 2023 for workers with passport no. C572XXXX, C572XXXX, EJ0611XXXX and EJ040XXXX. Noter that all salary slips, and payment were made as per legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. | |
| 4.4.5.5 | The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records | | Complied |



| Criterio | on / Indicator | Assessment Findings | Compliance |
|----------|---|---|------------|
| | should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. - Major compliance - | employment category, nationality, DOB, age, race and status in the payroll system. | |
| 4.4.5.6 | All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records. - Major compliance - | The management has established employment contract for all workers and contractors' workers. All the terms and conditions stated in the employment agreement were as per Labour Act 1955, latest MAPA/NUPW Agreement and Minimum Wage Order 2022 (amendment). The contract spells details as follows: 1. Duration of Employment 2. Workplace 3. Salary 4. Working hours 5. Medics 6. Accommodations 7. Compliance 8. Employment Disaster Scheme 9. Employment Cost 10. Transportation cost to and from origin country (foreign workers) 11. Income tax 12. Public holidays 13. Sick leave 14. Annual leave | Complied |
| | | 13. Sick leave | |

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| Criterion / Indicator | Assessment Findings | Compliance |
|-----------------------|--|------------|
| | 16. Workplace transportation | |
| | 17. Work equipment | |
| | 18. Termination of service | |
| | 19. Safety and health | |
| | 20. Passport keeping | |
| | 21. Movement | |
| | 22. Other terms and condition | |
| | The contact was agreed and signed by both employer and employee. | |
| | Reviewed the employment contract for workers with ID no. as follows: | |
| | Bekoh Estate | |
| | Harvester General Workers 1. 0624J 3. 0529D 2. 0625G 4. 0530D 5. 0545B 6. 0594J 7. 0618E 8. 0621I | |
| | Eldred Estate | |
| | Harvester General Workers 1. 0194 5. 0136 2. 0204 6. 0073 3. 0201 7. 0084 4. 0198 8. 0039 9. 0182 10. 0181 | |

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| Criterio | on / Indicator | | Assessment Find | ings | Compliance | |
|----------|---|--|--|--|------------|--|
| 4.4.5.7 | The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer. | | Management has established proper time recording system that makes working hours and overtime transparent for both employees and employer. | | | |
| | - Major compliance - | The estate managed through checkroll bo which is transparent shown in the payslip | | | | |
| | | | | orm and salary slip for June n 2023 for sampled workers | | |
| | | Bekoh Estate | | | | |
| | | Harvester 1. 0624J 2. 0625G | General Workers 3. 0529D 4. 0530D 5. 0545B 6. 0594J 7. 0618E 8. 0621I | | | |
| | | Eldred Estate | | | | |
| | | Harvester 1. 0194 2. 0204 3. 0201 4. 0198 | General Workers 5. 0136 6. 0073 7. 0084 8. 0039 9. 0182 10. 0181 | | | |



| Criterio | on / Indicator | | Assessment Find | lings | 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 overtime rate after 7.5 hours daily rated is: Process. | | | 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 - | deductions and net sa to workers on the da For daily rated worke the check-roll muste were recorded in the For piece-rated work roll books with record Reviewed the salary | alary of a worker. The y of payment. ers, wages and overt er attendance record overtime form. ers, wages were paid ds of daily piece-rated slips for the month o | tions of gross salary, all salary slips were distributed ime were paid according to s. Total hours of overtime d based on the daily check- d work achieved. of June 2022, October 2022 loyment ID. no. as follows: | Complied |

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| Criterio | n / Indicator | | Assessment Findings | Compliance |
|----------|--|---|--|-----------------------------|
| | | 2. 0625G | 4. 0530D 5. 0545B 6. 0594J 7. 0618E 8. 0621I | |
| | | Eldred Estate Harvester 1. 0194 2. 0204 3. 0201 4. 0198 | General Workers 5. 0136 6. 0073 7. 0084 8. 0039 9. 0182 10. 0181 | |
| 4.4.5.10 | Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions. - Minor compliance - | The social benefits f bonus, price bonus, medical care and he Water subsidy of 35 to each worker. | t, | |
| 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 - | temple, etc. were a dependents. Sundry compound. Worker's housing w water from taps, kin electricity supply wa Noted during intervi | found that playground, football field, mosque ar available and free access to all the workers ar y shop and crèche were available at housir as provided with adequate beds, clean runnir tchen and toilet facility. The housing water ar s from government source. ew with the workers, the housing condition were are any issues required housing repair, th | d Compliance g d e |

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| Criterio | n / Indicator | Assessment Findings | Compliance |
|----------|--|--|------------|
| | | workers will inform the management by filling form and the repair will be done in appropriate period. There was no complaint, and grievance related to housing standard. | |
| | | Bekoh Estate | |
| | | Sighted during site visit at the housing area, it was noted that the main drain and drain surrounding houses located in front of the temple were clogged with debris and garden waste. | |
| | | This was against the Workers' Minimum Standards of Housing and Amenities Regulations 1990 – Amendment 2021 which updated on 06/03/2021in section 23 (1)(b) stated. | |
| | | "The perimeter drains around each dwelling or block of dwellings including all outlet drains are kept in a good state of repair and clear of refuse or undergrowth to permit free flow of water" | |
| 4.4.5.12 | The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the | Addressed in the BPB Sustainability Policy dated 12/07/2021 signed by the Chief Executive Officer. | Complied |
| | workplace. - Major compliance - | Under section 2. Recognize the Right of All Employees, the policy stated the company commitment on: | |
| | | 2.3.2. Nurture safe and healthy working environment free from sexual harassment including educate women on their rights also awareness program to the workforce. | |
| | | Gender committee has been established in the estate. The participant was from the estate female staff, female workers and spouse. The meeting was conducted twice a year. Reviewed the latest minutes meeting conducted on 08/02/2023. | |
| 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 | | Complied |

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| Criterio | n / Indicator | Assessment Findings | Compliance |
|-----------|---|--|------------|
| | 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. | Under section 2. Recognize the Right of All Employees, the policy stated the company commitment on: 2.1.2. Respect the right to freedom of association/collective bargaining in organizations that are not against the laws of the Malaysian government. | |
| 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 exposed to hazardous working conditions. - Major compliance - | Addressed in the BPB Sustainability Policy dated 12/07/2021 signed by the Chief Executive Officer. Under section 2. Recognize the Right of All Employees, the policy stated the company commitment on: 2.1.4. Practice no child exploitation and comply with Child & Young Person (Employment) (Amendment) Act 2019, where young persons were employed, they are not allowed from carrying out tasks involving any hazardous work or any employment other than those specified in the act. Reviewed the workers master list confirmed there is no child or young person employed by the estates | |
| 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 - | Eldred Estate and Bekoh Estate have established a training program for all workers based on the training need analysis conducted on a yearly basis. The program was documented in the Occupational Safety and Health Action Plan 2023. Records of trainings were maintained by the estates as below: - Bekoh Estate | Complied |
| | | Training Date | |

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| Criterio | n / Indicator | Assessment Findings | | Compliance |
|----------|---|---|--|------------|
| | | Manuring, PPE and SDS Training Tractor and MTG Driver Training Harvesting Safety Training Checkpoint Security System Training Sexual Harassment Management at Workplace Training Scheduled Waste Training Hearing Conservation Training Zero Burning Policy and HCV Training Eldred Estate Training Nursery – Loading Seedling Training Security Training – AP and Security | 09/01/2023 06/03/2023 16/03/2023 14/12/2022 06/03/2023 30/03/2022 14/02/2023 30/03/2023 30/03/2023 | |
| | | Workshop Training Weighbridge Training Diesel Tank Training Salary Deduction Explanation Harvesting Training | 10/05/2023 25/04/2023 18/04/2023 01/04/2023 19/02/2023 | |
| 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 - | Eldred Estate and Bekoh Estate have conducted traini for all employees, management and contractors. Th analysis was conducted based on the job designat required by the job type and available for verification | ne training need ion and training | 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 | A training programme has been developed ar Occupational Safety and Health Training Plan 2023. Th | | Complied |



| Criterio | on / Indicator | Assessment Findings | Compliance |
|----------|--|--|------------|
| | training procedure Minor compliance - | sighted to have also included Gender Specific Training and involves staffs, workers and contractors. | |
| 4.5 Prin | ciple 5: Environment, natural resources, biodiversity | and ecosystem services | |
| Criterio | n 4.5.1: Environmental Management Plan | | |
| 4.5.1.1 | An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. - Major compliance - | Boustead Plantations Berhad has established Boustead Plantations Berhad - Sustainability Policy dated 12/07/2021 undersigned by the CEO. The policy states the company's commitments to ensure and promote clean environments for all its employees and operations. The policy was communicated to all workers through morning briefings and displayed on the notice boards. | Complied |
| 4.5.1.2 | The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations. - Major compliance - | The estates have established SOPs for Environmental Aspect Impact Evaluation and documented in Procedure Boustead Plantations Bhd – HSE Manual – Environmental Aspect/Impact Evaluation dated January 2018. The scoring and evaluation criteria were provided in the Manual. The estates have conducted the environmental aspects and impacts analysis documented in Environmental Aspects and Impacts Identification Form. The assessment was reviewed as and when there are new environment impacts identified. Latest review was conducted on 05/03/2023 at Bekoh Estate for New Construction of Workshop and 21/02/2023 at Eldred Estate for Store Cleaning. The management plan with mitigation measures has been established for each activity with significant impacts to the environment based on the Environmental Aspect and Impact Assessment and Environmental Monitoring Report. | Complied |



| Criterio | on / 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 estates have documented improvement plans to mitigate negative impacts and promote activities with positive impacts in the Environment Management Programme (EMP) for the year 2023. The improvement plans are further elaborated in the Water Management Plan, Pollution Prevention Plan and Waste Management Plan. Sighted sampled the implementation as follows: 1. To ensure the slope/ terracing area is minimum or free of facing soil erosion. | Complied |
| | | To ensure zero application of highly toxicity pesticide or herbicides. To minimize soil destruction and reduce frequency of chemicals and fertilizer application. To substitute chemical to cultural and biological practices. | |
| | | To upkeep natural waterways in the estates & comply to the JPS guideline on minimum width for river reserve. No chemical invention and manuring shall be carried out in the riparian reserved. Only manual slashing or weeding is allowed. | |
| | | Wo maintain/establish soft grasses in mature plantings at the interrow field & collection drains edges and roadside. To maintain sampling point at the river – incoming & outgoing. To | |
| 4.5.1.4 | A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance - | carry out water sampling on a yearly basis. The estate has established the Environment Management Programme (EMP) for the year 2023 based on the Environmental Aspect and Impact Evaluation. | Complied |
| 1 | | The estates continue to promote activities that gives positive impact to the environment by continuously providing awareness to the | |



| Criterio | on / Indicator | | Assessmer | nt Findings | | Compliance |
|----------|--|--|---|--------------------|-------------------|------------|
| | | employees which signages. | was communica | ted through train | ing, briefing and | |
| 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 - | on environmenta training plan esta Among the aware <u>Bekoh Estate</u> 1. Scheduled W 2. Zero Burning <u>Eldred Estate</u> | Scheduled Waste Training – 30/03/2022 Zero Burning and HCV Training – 30/03/2023 | | | |
| 4.5.1.6 | Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance - | Meeting held que encouraged to d Sighted the Envi | Environmental related matters were discussed during Environmental Meeting held quarterly. Workers interviews reveal that they are encouraged to discuss environmental issues with the management. Sighted the Environmental Meeting Minutes dated 31/03/2023 for Bekoh Estate and 22/03/2023 for Eldred Estate. | | | |
| Criterio | n 4.5.2: Efficiency of energy use and use of renewable energy | JY | | | | |
| 4.5.2.1 | Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should 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. | The monitoring of non-renewable energy usage is done monthly.Sighted the sampled monitoring records for diesel usage per FFB production for the review period as follows:Bekoh EstateMonthDiesel (Litres)Water (m³)Electricity (kWh)Jun 20222474 | | | Complied | |
| | · | Jun 2022 Jul 2022 | 2474 2180 | 4454.00 4626.00 | 15230 15744 | |

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| Criterion / Indicator | | Assessmen | t Findings | | Compliance |
|-----------------------|------------------------|-----------------|-------------------------|--------------|------------|
| | Aug 2022 | 2883 | 4273.00 | 14961 | |
| | Sep 2022 | 2371 | 4931.00 | 14962 | |
| | Oct 2022 | 2693 | 4328.00 | 15139 | |
| | Nov 2022 | 2297 | 4329.00 | 14613 | |
| | Dec 2022 | 2558 | 4781.00 | 14800 | |
| | Jan 2023 | 2257 | 5075.00 | 14150 | |
| | Feb 2023 | 2840 | 4950.00 | 14147 | |
| | Mar 2023 | 2075 | 4957.00 | 13337 | |
| | Apr 2023 | 2062 | 4418.00 | 14828 | |
| | May 2023 | 2662 | 4808.00 | 15760 | |
| | Eldred Estate Month | Diesel (Litres) | Water (m ³) | Electricity | |
| | 1 2022 | 2122 | 4405 | (kWh) | |
| | Jun 2022 | 2133 | 4405 | 4662 | |
| | Jul 2022 | 2184 | 4078 | 4383 | |
| | Aug 2022 | 2224 | 4042 | 4151 | |
| | Sep 2022 | 2071 | 4028 | 4556 4527 | |
| | Oct 2022 | 2266 | 3922 | | |
| | Nov 2022 | 2092 | 4361 | 4507 | |
| | Dec 2022 | 2341 | 4182 | 4238 | |
| | Jan 2023 | 1694 1626 | 3815 | 4238 4617 | |
| | Feb 2023 | | <u>3983</u> 3605 | 4822 | |
| | Mar 2023 | 1744 1498 | 3875 | 5723 | |
| | Apr 2023 May 2023 | 1498 | 4416 | 4638 | |



| Criterio | on / Indicator | | Asse | ssment F | indings | | | Compliance |
|----------|---|---|-----------------------|--|--------------------------|-----------|-----------------------|------------|
| 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 - | Fossil Fuel Consur Estate Bekoh Estate | itions in th | ne reduction Years was | n Fossil Fu | el Consum | | Complied |
| 4.5.2.3 | The use of renewable energy should be applied where possible. - Minor compliance - | No opportunity for | | | | | | Complied |
| Criterio | n 4.5.3: Waste management and disposal | | | | | | | |
| 4.5.3.1 | All waste products and sources of pollution shall be identified and documented. - Major compliance - | All waste produc documented in the identified as follow | e Waste Ma | | | | | Complied |
| | | Source Estate fields | Palm bio bags. | Ty omass, Ch | pes of Was nemical co | | Fertiliser | |
| | | Estate Nursery Store Chemicals Store fertilizers | Plastic po Chemica | olybags, No I containers s bags, Reo | s, Cardboa | rd Boxes | | |
| | | Workshop | | Lubricant, Scrap ir | | - | gloves, intainers, | |
| | | Linesite Office | | Greywater oles, Norma | , | | | |
| | | Clinic | Clinical v | vaste | | | | |

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| Criterio | on / Indicator | | Assessment Findings | Compliance |
|----------|---|--|---|------------------------|
| | | Creche, Shop, Canteen & Recreational Areas | Recyclables & Normal Bins. | |
| 4.5.3.2 | A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for: a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products - Major compliance - | waste identificatio Plan 2023. SOP for scheduled in the Sustainabili Procedure; Doc N Sighted the implet Estate and Bekoh a. Domestic was designated lat for 2023 for th b. The estate modestates and restates and restates | stes were collected 2 times a week and disposed at ndfill. Sighted the domestic waste collection records he estates. Donitors the Empty pesticide Container Records in the ecorded in the Daily Monitoring of Empty Chemical | Complied |
| 4.5.3.3 | The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. - Major compliance - | in the Sustainabili Procedure; Doc N The estates also h | d waste management was established and available ity and Safety Department SOP – Scheduled Wastes umber: SSD/02/SW-02; Effective Date: 03/01/2023. have a proper Scheduled Waste Store for storing use until time of disposal by DOE authorized waste | Major Noncompliance |

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| Criterion / Indicator | Assessment Findings | Compliance |
|-----------------------|---|------------|
| | disposal contractor. Disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment. | |
| | Sighted the sampled of Scheduled Waste Disposal as below: | |
| | Bekoh Estate | |
| | Scheduled Waste (SW 305); Empty Chemical Container; Date: 27/03/2023; Consignment Note: 2023032710FUSV74; Quantity: 1.5 Mt; Contractor: Kualiti Alam Sdn Bhd. | |
| | Eldred Estate | |
| | 1. Spent Filters (SW410); Disposal Date: 06/06/2023; Document Number: 0177695; Contractor: Kualiti Alam Sdn Bhd. | |
| | 2. Empty Chemical Containers (SW409); Disposal Date: 06/06/2023; Document Number: 0177696; Contractor: Kualiti Alam Sdn Bhd. | |
| | 3. Contaminated Cotton Rags (SW410); Disposal Date: 06/06/2023; Document Number: 0177697; Contractor: Kualiti Alam Sdn Bhd. | |
| | 4. Spent Lubricant (SW305); Disposal Date: 06/06/2023; Document Number: 0177693; Contractor: Kualiti Alam Sdn Bhd. | |
| | Used Battery (SW102); Disposal Date: 06/06/2023; Document Number: 0177694; Contractor: Kualiti Alam Sdn Bhd. | |
| | Nevertheless, the inventory and storage of Scheduled Waste at the estates were not in compliance with Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974, Evidence as below. | |
| | Eldred Estate and Bekoh Estate | |
| | 1. (9) Storage of Scheduled Waste - "Any person may store scheduled wastes generated by him for 180 days or less after its | |

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| Criterio | on / Indicator | Assessment Findings | Compliance |
|----------|--|---|------------|
| | | generation". It was verified that the estate has stored SW409, SW305 and SW410 exceeding the allowable timeline. 2. (11) A waste generator shall keep accurate and up-to-date inventory in accordance with the Fifth Schedule of the categories and quantities of scheduled wastes being generated, treated and disposed of and of materials or product recovered from such scheduled wastes for a period up to three years from the date the scheduled wastes was generated. It was verified that the estate did not maintain accurate inventory of its generated scheduled waste. Thus, Major Noncompliance was raised. | |
| 4.5.3.4 | Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers. - Major compliance - | Excess chemical containers that were not used for premixing was categorized under scheduled waste and disposed through scheduled waste contractor. The latest disposal of empty pesticide containers for the estates are as below. | Complied |
| 4.5.3.5 | Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses Minor compliance - | Bekoh Estate Domestic waste was collected 2 times week and disposed at designated landfill located far from housing area. The collection records for the year 2023 were available for verification for both | Complied |

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| Criterio | on / Indicator | Assessment Findings | Compliance |
|----------|--|---|------------|
| | | estates. Visit to the landfills at indicated that the landfill was well managed. There was no disposal of scheduled or recyclable waste at the landfill during the visit. | |
| | | Eldred Estate | |
| | | Domestic waste is disposed via local municipal council, Majlis Daerah Labis. The assigned contractor, SWM Environmental Sdn Bhd send their trucks to collect the domestic waste from the estate housing complex on a weekly basis. Records of collection were available for verification. | |
| Criterio | n 4.5.4: Reduction of pollution and emission | | |
| 4.5.4.1 | An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. | The established Environmental Management Plan has covered the plans for reduction of pollution and emission at the estates. It has been further detailed out in the Pollution Prevention Plan for 2023. | Complied |
| | - Major compliance - | The Environmental Aspect & Impact evaluation has been conducted to assess the impacts of the operations that contribute towards pollutions and emissions at the estates. The mitigation plans have then been established in the Pollution Prevention Plan for 2023. | |
| 4.5.4.2 | An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance - | Pollution Prevention Plan for 2023 included assessments of all polluting activities within the estate operation such as waste, air emissions and water discharges as mentioned in 4.5.1.3. | Complied |
| Critorio | · · · | | |
| Criterio | n 4.5.5: Natural water resources | | |
| 4.5.5.1 | The management shall establish a water management plan to maintain the quality and availability of natural water resources | Eldred Estate and Bekoh Estate have developed its Water Management Plan for 2023 and available for verification. It monitored water quality of incoming and outgoing waters to identify any adverse effect from the estate activities. The plan considers the efficient use of resources, | Complied |
| | | 1 · · · · · · · · | |

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| Criterion / Indicator | Assessment Findings | Compliance |
|---|---|------------|
| (surface and ground water). The water management plan may include:a. Assessment of water usage and sources of supply. | ensure amongst others that the use of water did not impact on other users and avoid contamination of ground and surface water. Sighted the implementation of the management plan as follows: | |
| b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities. | 1. The estates monitor the water consumption on monthly basis. Water consumption monitored include domestic usage and estate operation. The water consumption has been detailed out under indicator 4.5.2.1. | |
| 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 | 2. Adequate water for domestic use and consumption is available via government body Syarikat Air Johor. | |
| 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. | Interview with the sampled workers showed that the workers understand the restriction and the consequence of agrochemicals | |
| e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented. | application in the riparian zones. 4. The estates continuously monitor the river water quality. <u>Bekoh Estate</u> | |
| f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually. - Major compliance - | There were 2 water Sampling Points identified for River Water Quality Monitoring. Latest sampling was conducted on 30/03/2023. The results have not been provided by the assigned laboratory. Previous report available was for the year 2022 for the samples taken on 12/04/2022. The Water Quality Analysis Results indicated the pH, COD and AN complied with respective NWQS class IIA and IIB. | |
| | Eldred Estate | |
| | There were 2 water Sampling Points identified for River Water Quality Monitoring. Latest report available was 20/02/2023. The | |



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| Criterio | on / Indicator | Assessment Findings | Compliance |
|----------|--|---|------------|
| | | Water Quality Analysis Results indicated the pH, COD and AN complied with respective NWQS class IIA and IIB. | |
| 4.5.5.2 | No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance - | There were no construction of bunds, weirs and dams across main rivers or waterways passing through the estates. | Complied |
| 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 - | Water management plan includes rainwater harvesting, desilting of roadside drains and etc. For housing complex, the rainwater harvesting was used for cleaning housing and nursery compound. | Complied |
| Criterio | n 4.5.6: Status of rare, threatened, or endangered species a | nd 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 (<i>e.g.</i> The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities. - Major compliance - | Boustead Plantations Berhad has established the document HCV Assessment Report (Multi-Site), Johor (2018). A Supplementary Document entitled Supplementary Document - Mapping Upgrade for Boustead Johor Estates 2018 High Conservation Value Assessment Report dated September 2021 was available for verification conducted by Malaysian Environmental Consultants. HCV has been identified in the estates as below:EstateHCVDescriptionBekoh1, 3, 4 and 6Hindu Temple, Hindu Cemetery, Chinese | Complied |
| 4.5.6.2 | If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management | 5 , 5 5 5 | Complied |

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| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|---|------------|
| | planning and operations should include: a. Ensuring that any legal requirements relating to the protection of the species are met. b. Discouraging any illegal or inappropriate hunting, fishing, or collecting activities; and developing responsible measures to resolve human-wildlife conflicts. - Major compliance - | places in the estates such as entrance gates and boundary with local community. Interview with workers showed that they were aware of the restrictions. The estate's management records any sighting of wildlife in the estate premises in the RTE Record Book. | |
| 4.5.6.3 | A management plan to comply with Indicator 1 shall be established and effectively implemented, if required. - Major compliance - | The estate has established HCV Action Plan & Progress To Maintain HCV Sites FY 2023 dated 30/01/2023 as per recommendation by assessor. Sighted the implementation of the management plan as follows: 1. The estates have marked all designated HCVs with signages indicating the HCV area. 2. The estates conducted monitoring and patrolling at HCV and potential HCV area on monthly basis. 3. The estate recorded the wild animal sighted in the estate in RTE Records book. Reviewed the records FY 2021 and to-date FY 2023. 4. The estates conduct water quality monitoring for the rivers that flow through the estate by sampling of the incoming and outgoing water sent to accredited labs. 5. The estates have conducted regular awareness training on HCV and RTE to its workers. | Complied |



| Criterio | on / Indicator | Assessment Findings | Compliance |
|----------|---|--|------------|
| 4.5.7.1 | Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. - Major compliance - | Boustead Plantations Bhd has established Boustead Plantations Bhd - Sustainability Policy dated 12/07/2021 undersigned by the CEO. The policy states the company's commitments to ensure zero burning in all operations at all business units for the purpose of replanting, unless approved by the authority, in compliance with Environmental Quality Act 1974. | Complied |
| | | No open burning noted based on the records on the land clearing and felling for the replanting at the estate. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction. | |
| 4.5.7.2 | A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. - Major compliance - | No open burning noted based on the records on the land clearing and felling for the replanting at the estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction. | NA |
| 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 open burning noted based on the records on the land clearing and felling for the replanting at the estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction. | NA |
| 4.5.7.4 | Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance - | No open burning noted based on the records on the land clearing and felling for the replanting at the estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction. | Complied |



| Criterio | on / Indicator | Assessment Findings | Compliance | |
|----------------------------------|--|--|--------------------------|--|
| Criterion 4.6.1: Site Management | | | | |
| 4.6.1.1 | Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance - | Boustead Plantations Bhd has established the Agriculture Manual (Oil Palm Circular) covers felling and clearing, planting material, weeding, manuring, pest & disease, census & thinning out, drains, road & bridges, soil/water conservation, boundaries, fences & survey, supplying, pruning, collection (harvesting), external transport and etc. Nevertheless, the monitoring of River Water Quality was not done in accordance with the standard operating procedures. <u>Eldred Estate</u> There was no evidence that the River Water Sampling was done by an accredited lab. This was not in line with the Boustead Plantations – Water Sampling Procedure; Issue: 1; Date: Jan 2019; 4.0 Procedure; c) Sampling Methods – And it shall be tested and analyze by accredited lab only. | Minor Non- Compliance | |
| 4.6.1.2 | Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals. - Major compliance - | Boustead Plantations Berhad – <i>Polisi Kemampanan BPB</i> dated 12/07/2021 undersigned by the CEO. Based on the policy, there will | Complied | |
| 4.6.1.3 | A visual identification or reference system shall be established for each field. - Major compliance - | Visual identification has been established for each field and divided into division and blocks. Each block is named by road and visual identification (field marker) erected for reference. Cross checked with the records and the pictorial evidence provided found to be consistent. | Complied | |


| Criterio | on / Indicator | Assessment Findings Compliance |
|----------|--|---|
| Criterio | n 4.6.2: Economic and financial viability plan | |
| 4.6.2.1 | A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance - | Eldred Estate and Bekoh Estate have established 5 years business plan and BPB Final Budget – Financial Year 2023 as a guidance for daily estate operations. Sighted the Projection 2024 – 2028 available for verification. The business plan contains Mature Area Hectares (HA), Yield (Crops), Estate Costs (General Charges, Upkeep and Cultivation, Manuring, Roads & Bridges, External Transport and depreciation), Estate Other Expenditure (Replanting Area), Capex, Sundry Revenue and Planted Area Reconciliation. |
| 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 - | spanned over a 5-year period till 2028. As of now there are no plans |
| 4.6.2.3 | The business or management plan may contain: a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production: cost per tonne of FFB d) Price forecast e) Financial indicators: cost benefit, discounted cash flow, return on investment - Major compliance - | Eldred Estate and Bekoh Estate have established 5 years business plan and BPB Final Budget – Financial Year 2023 as a guidance for daily estate operations. Sighted the Projection 2024 – 2028 available for verification. The business plan contains Mature Area Hectares (HA), Yield (Crops), Estate Costs (General Charges, Upkeep and Cultivation, Manuring, Roads & Bridges, External Transport and depreciation), Estate Other Expenditure (Replanting Area), Capex, Sundry Revenue and Planted Area Reconciliation. |



Compliance Criterion / Indicator **Assessment Findings** 4.6.2.4 The management plan shall be effectively implemented and the The management plan was effectively implemented, and the Complied achievement of the goals and objectives shall be regularly achievement of the goals and objectives were regularly monitored, monitored, periodically reviewed and documented. documented and reviewed through Monthly Progress Reports, Monthly Accounts Reports, Annual Financial Reports, Agronomist Visit Reports - Major compliance and Internal Audit Report. Criterion 4.6.3: Transparent and fair price dealing 4.6.3.1 Pricing mechanisms for the products and other services shall The pricing mechanism was included contract agreement between the Complied be documented and effectively implemented. Boustead Plantations Berhad with the Contractors. Reviewed the contract agreement as follows: - Major compliance -Bekoh Estate 1. Memorandum of agreement between Boustead Plantations Berhad Bpe 02/2023 dated 01/02/2023 in Contract Harvesting Rate Schedule FY 2023 2. Memorandum of agreement between Boustead Plantations Berhad with SXX YXXXXXXXXXX KXXX EXXXXXXXX, contract no. Bkh-Syke 04/2023 and Bkh-Syke 05/2023 dated 01/02/2023 in in Contract Harvesting Rate Schedule FY 2023 and pruning rate of payments. Eldred Estate 1. Memorandum of agreement between Boustead Eldred Sdn. Bhd. with BXXXXXXX PXXXXXXXXX EXXXXXXXX, Contract no. E-BPE001/2023 and E-BPE002/2023 2. Memorandum of agreement between Boustead Eldred Sdn. Bhd. with PXXXXXXXX YXXXX MXXXX, Contract no. E-BV00618/2023 dated 01/04/2023

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|-----------|--|--|--|--|------------|
| 4.6.3.2 | All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance - | transparent and agreed included in the contract a | payments terms. T agreement. ade as per paymer | t that are fair, legal and he payment terms were nt terms agreed in the ntractors as follows: Payment Date 10/05/2023 07/06/2023 | Complied |
| Criterior | 4.6.4: Contractor | I | | | |
| 4.6.4.1 | Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance - | As stated in the contract agreement between the Boustead Plantations Berhad with the Contractors in section 8. OSHA, RSPO, and MSPO Compliance Additional Clause stated as follows: The contractor shall comply with MSPO requirement and accept MSPO approved auditors to very assessment through a physical inspection if required. the estates were also conducted briefing to the contractors on MSPO requirement during stakeholders' consultation. Reviewed the minutes meeting, PowerPoint slide presentation for meeting conducted 30/05/2023 (external) and 01/03/2023 (internal) for Bekoh Estate and 26/01/2023 (external) and 30/01/2023 (internal) for Eldred Estate. | | Complied | |
| 4.6.4.2 | The management shall provide evidence of agreed contracts with the contractor. | The contractors were pro transparent and agreed p | | that are fair, legal, and | Complied |

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|----------|---|---|------------|
| | - Major compliance - | Reviewed the contract agreement as follows: <u>Bekoh Estate</u> Memorandum of agreement between Boustead Plantations Berhad with BXXXXXX PXXXXXXXX EXXXXXXX, Contract no. Bkh- Bpe 02/2023 dated 01/02/2023 in Contract Harvesting Rate Schedule FY 2023 Memorandum of agreement between Boustead Plantations Berhad with SXX YXXXXXXXXXX KXXX EXXXXXXX, contract no. Bkh- Syke 04/2023 and Bkh-Syke 05/2023 dated d01/02/2023 in in Contract Harvesting Rate Schedule FY 2023 and pruning rate of payments | |
| | | <u>Eldred Estate</u> Memorandum of agreement between Boustead Eldred Sdn. Bhd. with BXXXXXX PXXXXXXXX EXXXXXXX, Contract no. E- BPE001/2023 and E-BPE002/2023 Memorandum of agreement between Boustead Eldred Sdn. Bhd. with PXXXXXXXX YXXXX MXXXX, Contract no. E-BV00618/2023 dated 01/04/2023 | |
| 4.6.4.3 | The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance - | As stated in the contract agreement between the Boustead Plantations Berhad with the Contractors in section 8. OSHA, RSPO, and MSPO Compliance Additional Clause stated as follows: The contractor shall comply with MSPO requirement and accept MSPO approved auditors to very assessment 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 | | Complied |

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Criterion / Indicator Compliance **Assessment Findings** contractor, by checking and signing the assessment of the contractor will report to the field supervisor. The field supervisor will contractor for each task and season contracted. check and verify the works and recoded in the costing book. At month end, the field supervisor will submit the records to the Asst. Manager - Major compliance for verification of payment and approved by the Estate Manager. 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 This indicator is not applicable as there were no new planting at Eldred NA value unless it is carried out in compliance with the National Estate and Bekoh Estate. and/or State Biodiversity Legislation. - Maior compliance -4.7.1.2 No conversion of Environmentally Sensitive Areas (ESAs) to oil This indicator is not applicable as there were no new planting at Eldred NA palm as required under Peninsular Malaysia's National Physical Estate and Bekoh Estate. 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 This indicator is not applicable as there were no new planting at Eldred NA implemented on peat land as per MPOB guidelines on peat land Estate and Bekoh Estate. development or industry best practice. - Major compliance -



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|----------|---|--|------------|--|
| Criterio | n 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. | This indicator is not applicable as there were no new planting at Eldred Estate and Bekoh Estate. | NA | |
| | - Major compliance - | | | |
| 4.7.3.2 | SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. | This indicator is not applicable as there were no new planting at Eldred Estate and Bekoh Estate. | NA | |
| | - Major compliance - | | | |
| 4.7.3.3 | The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. | This indicator is not applicable as there were no new planting at Eldred Estate and Bekoh Estate. | NA | |
| | - 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. | estates, the impacts and implications of Estate and Bekoh Estate. mall estate is to be managed should be an to manage the impacts developed, | | |
| | - Minor compliance - | | | |
| Criterio | n 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. | This indicator is not applicable as there were no new planting at Eldred Estate and Bekoh Estate. | NA | |



| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|---|--|------------|
| | - Major compliance - | | |
| 4.7.4.2 | Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. | | NA |
| | - Major compliance - | | |
| Criterio | n 4.7.5: Planting on steep terrain, marginal and fragile soils | | |
| 4.7.5.1 | Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. | This indicator is not applicable as there were no new planting at Eldred Estate and Bekoh Estate. | NA |
| | - Major compliance - | | |
| 4.7.5.2 | Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. - Major compliance - | This indicator is not applicable as there were no new planting at Eldred Estate and Bekoh Estate. | NA |
| 4.7.5.3 | Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance - | This indicator is not applicable as there were no new planting at Eldred Estate and Bekoh Estate. | NA |
| Criterio | n 4.7.6: Customary land | | |
| 4.7.6.1 | No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to | This indicator is not applicable as there were no new planting at Eldred Estate and Bekoh Estate. | NA |



| Criterio | n / Indicator | Assessment Findings | Compliance | |
|----------|--|--|------------|--|
| | express their views through their own representative institutions. - Major compliance - | | | |
| 4.7.6.2 | Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. | | NA | |
| 4.7.6.3 | - Minor compliance - Where recognized customary or legally owned lands have been | | NA | |
| | taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. | | | |
| | - Major compliance - | | | |
| 4.7.6.4 | The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement. | | NA | |
| | - Major compliance - | | | |
| 4.7.6.5 | Identification and assessment of legal and recognised customary rights shall be documented. | This indicator is not applicable as there were no new planting at Eldred Estate and Bekoh Estate. | NA | |
| | - Major compliance - | | | |
| 4.7.6.6 | A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. | This indicator is not applicable as there were no new planting at Eldred Estate and Bekoh Estate. | NA | |
| | - Major compliance - | | | |
| 4.7.6.7 | The process and outcome of any compensation claims shall be documented and made publicly available. | This indicator is not applicable as there were no new planting at Eldred Estate and Bekoh Estate. | NA | |

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| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|----------------------|---|------------|
| | - Major compliance - | | |
| 4.7.6.8 | | nities that have lost access and rights to land for on expansion should be given opportunities to benefit e plantation development. | |



Appendix B: Smallholder Member Details

| No. | Smallho | Smallholder Location of GPS Coordinates | | ordinates | Certified | Planted | |
|----------|---------|---|----------------------------|-----------|-----------|---------|-----------|
| | Name | MPOB License Number | Planted Area (District) | Latitude | Longitude | | Area (ha) |
| | Nil | | | | | | |
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Appendix C: Location and Field Map

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Appendix D: 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 |
| РК | Palm Kernel |
| РКО | 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 |
| | |