

MALAYSIAN SUSTAINABLE PALM OIL MSPO OPMC Public Summary Report Initial Assessment

☐ Annual Surveillance Assessment (Choose an item.)☒ Recertification Assessment (RA 1)

☐ Extension of Scope

JOHOR PLANTATIONS BERHAD

Client Company (HQ) Address: K.B. 705 Ulu Tiram 81900 Johor Bahru, Johor, Malaysia

Certification Unit:

Palong Cocoa Palm Oil Mill & Plantations: Palong Complex (Palong Estate, Mungka Estate, UMAC Estate & Labis Bahru Estate)

Date of Final Report: 28/11/2023

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

Report Number: 3717747

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



TABI	E of C	CONTENTS	Page No
	Section	on 1: Executive Summary	3
	1.1	Organizational Information and Contact Person	3
	1.2	Certification Information	3
	1.3	Other Certifications	4
	1.4	Location of Certification Unit	4
	1.5	Certified Area	5
	1.6	Plantings & Cycle	5
	1.7	Certified Tonnage of FFB	5
	1.8	Uncertified Tonnage of FFB	5
	1.9	Certified Tonnage	6
	1.10	Actual Sold Volume (CPO)	6
	1.11	Actual Sold Volume (PK)	6
	Section	on 2: Assessment Process	7
		2.1 BSI Assessment Team	8
		2.2 Impartiality and conflict of interest	11
		2.3 Accompanying Persons	11
		2.4 Assessment Plan	11
	Section	on 3: Assessment Findings	14
		3.1 Details of audit results	14
		3.2 Details of Nonconformities and Opportunity for improvement	
		3.3 Status of Nonconformities Previously Identified and OFI	
		3.4 Summary of the Nonconformities and Status	19
		3.5 Issues Raised by Stakeholders	
	_	3.6 List of Stakeholders Contacted	
		on 4: Assessment Conclusion and Recommendation	
		ndix A: Summary of the findings by Principles and Criteria	
	• •	ndix B: Smallholder Member Details	
		ndix C: Location and Field Map	
	Appe	ndix D: List of Abbreviations	142



Section 1: Executive Summary

1.1 Organizational Information and Contact Person					
Company Name	Johor Plantations Berhad				
Mill/Estate	Certification Unit	MPOB Lice	nse No.	Expiry Date	
	Palong Cocoa Palm Oil Mill	5783920040	000	30/11/2023	
	Palong Estate	5705850020	000	31/03/2024	
	Mungka Estate	621297002000		31/03/2024	
	UMAC Estate			30/09/2024	
	Labis Bahru Estate			30/09/2024	
Address	KB 705, Ulu Tiram, 80990 Johor	Bahru, Johor	, Malaysia		
Management Representative	Wan Adlin Wan Mahmood				
Website	www.johorplantations.com E-mail wanadlin@johorplantations.com				
Telephone	07-8611611	Facsimile	07-863108	4	

1.2 Certification Informa	1.2 Certification Information					
Certificate Number	Mill: MSPO 698010					
Date of First Certification	01/04/2019		Certificate Expiry Date	31/03/2029		
Scope of Certification			nable Palm Oil and Palm Oil I stainable Oil Palm Fruits	Products		
Visit Objectives	RC1 and look for porcertification and the addressed by the ordemonstrating the area and contractual requapplicable with regardents.	ositive requir rganiza bility bireme ard to achie ole to	sment was to conduct an Re- evidence to ensure that el- rements of the management ation's management system to support the achievement ents and the organization's the scope of the manage vement and applicability of the identify potential areas for	ements of the scope of standard are effectively and that the system is of statutory, regulatory specified objectives, as ement standard, and to the forward strategic plan		
Standard	☐ MSPO MS 2530-2:2013 – General Principles for Independent Smallholders					
	⊠ MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills					
Recertification Assessment Visit (RC) 1			16-19/10/2023			
Continuous Assessment Vis	it Date (CAV) 1_1	-	·	·		



Continuous Assessment Visit Date (CAV) 1_2	-
Continuous Assessment Visit Date (CAV) 1_3	-
Continuous Assessment Visit Date (CAV) 1_4	-

1.3 Other Certifications						
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date			
RSPO 613087	RSPO Principles & Criteria for Sustainable Palm Oil Production: 2018; Malaysian National Interpretation: 2019; with Identity Preserved Supply Chain Module	BSI Services Malaysia Sdn Bhd	22/01/2024			
EU-ISCC-Cert-DE119- 60236780	International Sustainability and Carbon Certification (EU)	ASG Cert	17/05/2024			
ISCC-PLUS-Cert- DE119-60236780	International Sustainability and Carbon Certification (EU) Plus	ASG Cert	17/05/2024			
HALAL A199300	MS 1500:2009	JAKIM	30/06/2025			
BVC-MSPO/SC-0031	MSPO Supply Chain Certification Standard (MSPO SCCS) 1 October 2018	Bureau Veritas (M) Sdn Bhd	10/03/2025			

1.4 Location of Certification Unit					
Name of the Certification Unit (Palm Oil Mill/ Estate/	Cito Address	GPS Reference of the site office			
Smallholder/ Independent Smallholder)	Site Address	Latitude	Longitude		
Palong Cocoa Palm Oil Mill	PTD 15677, HSD 52397, Mukim Buloh Kasap, Daerah Segamat, Johor, Malaysia	2° 42' 22.80" N	102° 47' 11.80" E		
Palong Estate	PTD 15677, HSD 52397, Mukim Buloh Kasap, Daerah Segamat, Johor, Malaysia	2° 44' 53.00" N	102° 45' 06.90" E		
Mungka Estate	PTD 15678, HSD 52398, Mukim Buloh Kasap, Daerah Segamat, Johor, Malaysia	2° 41' 10.90" N	102° 47' 15.00" E		
UMAC Estate	PTD 298, HSD 3746, Mukim Keratong, Daerah Rompin, Pahang, Malaysia	2° 53' 03.00" N	102° 54' 24.00" E		
Labis Bahru Estate	Lot 1265, Geran 38197, Mukim Pogoh, Daerah Segamat, Johor, Malaysia	2° 25' 48.00" N	102° 52' 27.00" E		



1.5 Certified Area							
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted		
Palong Estate	3,494.73	20.74	186.45	3,701.92	94.40		
Mungka Estate	2,646.42	80.79	171.06	2,898.27	91.31		
UMAC Estate	*1,555.90	0.84	59.59	1,616.33	96.26		
Labis Bharu Estate	1,947.24	14.53	146.39	2,108.16	92.37		
Total (ha)	9,644.29	116.9	563.49	10,324.68			

Notes:

^{*}UMAC Estate - Oil Palm planted decreased by 0.08 ha due to the resurvey of P21 area from the previous year (1,616.41 ha) due to the planted area became a field road.

1.6 Plantings & Cycle							
Estate	Age (Years)					Makuua	T
Estate	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30	Mature	Immature
Palong Estate	100.96	411.34	2,982.43	0	0	3,393.77	100.96
Mungka Estate	114.04	0	2,361.57	170.81	0	2,532.38	114.04
UMAC Estate	28.77	0	1,527.13	0	0	1,527.13	28.77
Labis Bharu Estate	479.25	247.69	988.24	232.06	0	1,467.99	479.25
Total (ha)	723.02	659.03	7,859.37	402.87	0	8,921.27	723.02

1.7 Certified Tonnage of FFB							
	Tonnage / year						
Estate	Estimated Actual		Forecast				
	(Mar 2023 - Feb 2024)	(Oct 2022 - Sept 2023)	(Mar 2024 - Feb 2025)				
Palong Estate	74,147.00	70,518.86	74,243.45				
Mungka Estate	59,699.00	42,139.42	56,997.68				
UMAC Estate	36,587.00	29,830.20	35,424.63				
Labis Bharu Estate	38,831.00	33,751.17	37,157.85				
Rengam	0.00	2,037.15	0.00				
Total (mt)	209,264.00	178,276.80	203,823.61				

1.8 Uncertified Tonnage of FFB					
	Tonnage / year				
Estate	Estimated	Actual	Forecast		
	(Mar 2023 - Feb 2024)	(Oct 2022 - Sept 2023)	(Mar 2024 - Feb 2025)		



Nil	N/A	N/A	N/A	
Total (mt)	N/A	N/A	N/A	
Note: No FFB purchase from outside crop, the mill is on segregation supply chain model.				

1.9 Certified Tonnage						
	Estimated	Estimated Actual				
	(Mar 2023 - Feb 2024)	(Oct 2022 - Sept 2023)	(Mar 2024 - Feb 2025)			
Mill Capacity:	FFB	FFB	FFB			
40 MT/hr	209,264.00	178,276.8	203,823.61			
SCC Model:	CPO (OER: 22.00%)	CPO (OER: 19.64%)	CPO (OER: 19.70%)			
SG	46,038.00	35,004.74	40,047.60			
	PK (KER: 5.45%)	PK (KER: 5.50%)	PK (KER: 5.15%)			
	11,405.00	9,807.98	10,463.93			

1.10 Actual Sold Volume (CPO)						
CDO (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total	
CPO (mt)	MSPO Certified	ISCC RSPO		Conventional	Total	
35,004.74	0.00	4,121.77	22,816.87	163.75	27,102.39	

1.11 Actual Sold Volume (PK)						
DV (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total	
PK (mt)	MSPO Certified	ISCC	ISCC RSPO Conventional			
9,807.98	0.00	0.00	6,245.66	0.00	6,245.66	



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 16-19/10/2023. The audit programme is included as Section 2.4. The approach to the audit was to treat the Palong Cocoa Palm Oil Mill together with Palong Estate, Mungka Estate, UMAC Estate, and Labis Bahru Estate as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities. 30 days prior to audit, public notification posted in the BSI website as per the following link:

https://www.bsigroup.com/globalassets/localfiles/en-my/mspo/Public%20Notification/2023/08-3-mspo-public-notification johor-plantations-berhad-palong-cocoa-palm-oil-mill english.pdf

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. MS 2530-3:2013 and MS 2530-4:2013 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The 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 reassessment are detailed in Section 4.2.

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 5-year cycle.

Assessment Program						
Name (Mill / Plantation / Group smallholders)	Year 1 (Recertification)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)	
Palong Cocoa Palm Oil Mill	√	√	√	√	√	
Palong Estate	√	-	√	-	√	
Mungka Estate	-	√	√	-	-	
UMAC Estate	-	√	-	√	-	
Labis Bharu Estate	√	-	-	√	√	

Tentative Date of Next Visit: October 14, 2024 - October 17, 2024

Total No. of Mandays: 11 Mandays

2.1 BSI Assessment Team

Team Member Name	Role	Qualifications
Nor Halis Abu Zar (NHA)	Team Leader	Education: Bachelor of Science, Plantation Technology and Management, graduated from UiTM in 2012 and Diploma in Plantation and Industry Management from UiTM in 2009.
		Work Experience:
		He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day-to-day plantation operations. In his career at Kulim Plantation. He had accumulated more than 6 years of sustainability implementation experience. He is a qualified Lead Auditor for MS 2530:2013 and RSPO Auditor for ENV and OSH and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.
		Training attended:
		He has completed RSPO P&C Lead Auditor Course in Oct 2020, Refresher RSPO P&C Lead Auditor Course in May 2022, RSPO ISH Standard 2019 in December 2021, RSPO SCC 2020 in September 2022, QMS 9001:2015 Lead Auditor Course in April 2019, OSH 45001:2018 Lead Auditor Course in June 2021, IMS (ISO 9001:2015 & ISO 14001:2015) Lead Auditor Course, HCV & HCS Training in August 2022, MSPO 2530:2013 Lead Auditor Course in February 2019, MSPO SCCS Auditor in February 2019 and also trained in SMETA Requirement Training on May 2021.



	1	
		Aspect covered in this audit:
		During the assessment he covered on Legal requirements, complaint, and grievances, social, workers welfare and contractors.
		Language proficiency:
		Fluent in both verbal/written Bahasa Malaysia and English Language.
Amir Bahari (AB)	Team Member	Education:
		He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996.
		Work Experience:
		He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment, he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 38 man-days in the auditing profession after ending career in the plantation industry.
		Training attended:
		ISO 9001, ISO 14001, OHSAS 18001 & also RSPO.
		Aspect covered in this audit:
		During the assessment he covered on traceability continuous improvement, environment, HCV and best practices.
		Language proficiency:
		Fluent in both verbal/written Bahasa Malaysia and English Language.
Hanafi	Team Member	Education:
Shufaat@Mohd (HSM)		He holds an Executive Master in Plantation Management from Asean E University and Diploma in Plantation Industry Management from Mara University of Technology.
		Work Experience:
		Has 17 years working experience at managerial level of oil palm in plantation industry in Malaysia and aboard. The last position was Senior Manager in Primula Gemilang Sdn Bhd, Sibu, Sarawak and responsible for 12,000 hectare of oil palm plantation.
		Training attended:
		Has successfully obtained competency of Quality Management system (ISO 9001:2015) and ISO Integrated Management system (ISO 9001:2015 and ISO 14001:2015) and MSPO SCCS auditor training in 2019 conducted by PSV Sdn Bhd. He has successfully obtained competency of Malaysia Sustainable Palm oil (MSPO) course for Malaysian Sustainable Palm Oil (MSPO).
		Aspect covered in this audit:
		During the assessment he covered on, occupational health and safety, GAP, training and best practices.
		Language proficiency:
		Fluent in both verbal/written Bahasa Malaysia and English Language.
Mohd Sabre	Peer Reviewer	Education:
Salim (MSS)		Master's in Business Administration (MBA) from UiTM in 2006 and Bachelor



-		
		Science Agribusiness from UPM in 1986.
		Work Experience:
		He gained his working exposure in the plantation sector, serving as an Plantation Manager with Hap Seng Plantation Berhad and currently as consultant, free-lance lecturer, and trainer at MDV Management Sdn Bhd. He has more than 50 MSPO report that has been reviewed.
		Training attended:
		He has completed Endorsed Lead Auditor Course and Endorsed MSPO Lead Auditor Course and MSPO Peer Review certificate by MPOCC. He has attended MSPO Peer Reviewer 1 - 2017 by MPOCC.
		Expertise:
		General management, leadership & financial management, occupational safety & health management, plantation (agriculture & agribusiness) management, Malaysian Sustainable Palm Oil (MSPO).
Dr. Suhaili Sahari	Peer Reviewer	Education:
(DSS)		Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato' Mohd Muda.
		Work Experience:
		Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.
		Training attended:
		He has attended MSPO Peer Reviewer Training 2 - 2017 by MPOCC.
		Expertise:
		General Management, Auditing, Environment and Plantation Management.



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
	N/A	

2.4 Assessment Plan

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

Date	Time	Subjects	(NHA)	(AB)	(HSM)
Sunday, 15/10/2023	-	Travelling from Kuala Lumpur to Segamat.	√	√	√
Monday, 16/10/2023 Labis Bahru Estate	08:30 - 09:00	 Opening Meeting Presentation by BSI Lead Auditor - introduction of team member and assessment agenda Confirmation of assessment scope and finalizing audit scope 	√	√	√
	09:00 - 12:30	Estate assessment: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√
	12:30 - 13:30	Lunch break	√	√	✓
	13:30 - 16:30	Continue: Document Review (MS 2530:2013 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices, P7: Development of New Planting	√	√	>
	16:30 - 17:00	Interim closing meeting	√	√	√
Tuesday, 17/10/2023 Labis Bahru Estate (NHA) & Palong	09:00 - 12:30	Estate assessment: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√



Date	Time	Subjects	(NHA)	(AB)	(HSM)
Estate (AB & HSM)	10:00 - 12:00	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) at Mill	√	-	-
	12:30 - 13:30	Lunch break	√	√	√
	13:30 - 16:30	Document Review (MS 2530:2013 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices, P7: Development of New Planting	\checkmark	√	√
	16:30 - 17:00	Interim closing meeting	√	√	√
Wednesday, 18/10/2023 Palong Estate (NHA & AB) & Palong Cocoa POM (HSM)	09:00 - 12:30	Continue: Document Review (MS 2530:2013 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices, P7: Development of New Planting Mill Assessment: Plant visit, FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	<	√	√
	12:30 - 13:30	Lunch break	√	√	√
	13:30 - 16:30	Document Review (MS 2530:2013 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices, P7: Development of New Planting Document review (MS 2530:2013 Part 4): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best	√	√	√
	16:30 -	practices. Interim closing meeting	√	√	√
	17:00		•	•	



Date	Time	Subjects	(NHA)	(AB)	(HSM)
Thursday, 19/10/2023 Palong Cocoa POM (NHA & AB)	09:00 - 12:30	Mill Assessment: Plant visit, FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	~	√	-
	12:30 - 13:30	Lunch break	√	√	-
	13:30 - 14.00	Document review (MS 2530:2013 Part 4): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices.	√	√	-
	14.00 - 15.00	Assessment team discussion and preparation and closing meeting	√	√	-



Section 3: Assessment Findings

3.1 Details of audit results

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

- ☐ MSPO MS 2530-2:2013 General Principles for Independent Smallholders
- MSPO MS 2530-3:2013 General Principles for Oil Palm Plantations and Organized Smallholders

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 zero (0) Major & one (1) Minor nonconformities and one (1) OFI raised. The Palong Cocoa Oil Mill and Supply Bases 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 below is the summary of the non-conformity raised during this assessment.

	Non-Confor	mity Report			
NCR Ref #:	2407208-202310-N1	Issue Date:	19/10/2023		
Due Date:	Next Assessment	Date of Closure:	Open		
Area/Process:	Palong Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.5.5.1 Minor		
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:				
	f) Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.				
Statement of Nonconformity:	Water Management Plan for Tube Well was not recorded.				
Objective Evidence:	During site visit at Palong Estate (Kemedak Division), it was confirmed the availability of Tube Well at P11 Block 2 however, there is no water management plan prepared for tube well and there was no record of ground water table measurement being made by the estate.				
Corrections:	Estate management has reviewed the Water Management Plan for the tube well.				
Root cause analysis:	Lack of awareness regarding the requirements of the water management plan for the tube well, which has not been used yet but serves the purpose of addressing drought season situations.				
Corrective Actions:	Palong Estate will review the Water Management Plan for the tube well annually.				
	2. The compliance repor	t wiii be reviewea quarter	ly to ensure inclusion of relevant		



	requirements.
Assessment Conclusion:	The CAP is accepted, further verification will be conducted in the next audit.

Opportunity For Improvement			
Ref:	2407208-202310-I1	Clause:	MSPO 2530 Part 3: 4.5.1.2
Area/Process:	Palong Estate		
Objective Evidence:	Palong Estate (Main Division) - There were traces of spillages in the fertilizer store during a site visit on 17/10/2023. The estate to enhance effort in managing such occurrences with prevention measures to avoid any environmental issues.		

	Noteworthy Positive Comments
1.	Good relationship being maintained with surrounding communities and stakeholders.
2.	Good commitment from the management on maintaining the certification.
3.	Good all-in round knowledge in handling the audit.

3.3 Status of Nonconformities Previously Identified and OFI

Non-Conformity Report			
NCR Ref #:	2263250-202210-M1 Issue Date:		20/10/2022
Due Date:	19/01/2023	Date of Closure:	16/01/2023
Area/Process:	Palong Estate & Sepang Loi Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.4.4.2(d)(e) Major
Requirements:	 d) The occupational safety and health plan shall cover the following: 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 Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. 		
Statement of Nonconformity:	Implementation of PPE usage and Handling of chemical procedures were not fully demonstrated.		
Objective Evidence:	During site visit ang Palong Estate Main Division and Sepang Loi Division, the following evidence were observed:		
	found two workers PPE. It was not in Meracun Mist Blow Section 3.1.7 Sema	who handle mist blower line with "Prosedur Pand ver, Reference No: KUI isa (i) Memakai alat kes	CKS Pump and Mist Blower, it was were not wearing earplug as their uan Kerja Selamat – Penyemburan IM/PKS-OSH-1 dated 01/03/2021 elamatan (PPE) yang lengkap iaitung, kasut but, apron, topi dan "ear



	 plug" semasa menjalankan kerja-kerja meracun. Field P07/01, Harvesting Operation, it was noticed that 2 Mechanical Buffalo (MB) Driver were wearing rubber shoes instead of safety shoes. Other than that, visit at Sepang Loi Division, Field P00/01, it was found that Tractor Kubota Driver was wearing Wellington Boots instead of safety shoes. It was not in line with "Prosedur Panduan Kerja Selamat – (6) Pemanduan Badang/Mechanical Buffalo (MB), Reference No: KULIM/PKS-OSH-1 dated 01/03/2021 Section 6.1.4, PPE (i) Topi Keselamatan, (ii) Kasut Keselamatan, (iii) Baju Pantul Cahaya, (iv) Cermin Mata keselamatan. And (b) Pemanduan Traktor Section 8.1.4 PPE (i) Topi Keselamatan, (ii) Kasut Keselamatan, (iii) Baju Pantul Cahaya, (iv) Cermin Mata keselamatan. Field P12/02, Circle Spraying Operation using CKS Pump and Mist Blower, Premix Chemical Supersate and Kelly was used. However, there were no SDS and Clean Water provided at the field for emergency purpose. It was not in line with "Prosedur Panduan Kerja Selamat – Meracun, Reference No: KULIM/PKS-OSH-1 dated 01/03/2021 Section 2.1.6 (iii) Mandur perlu sentiasa membawa peti pertolongan cemas dan Salinan SDS untuk kegunaan kecemasan and 3.1.6(viii) Pekerja Meracun di kehendaki membawa bersama sabun dan air bersih untuk kegunaan mencuci jika terkena racun. Kontainer yang digunakan hendaklah bertanda Air Bersih".
Corrections:	 Refresher training on safety spraying had been conducted which includes briefing on the importance of wearing personal protective equipment (PPE) and 'Prosedur Panduan Kerja Selamat' before and after spraying activity. Refresher training on 'Prosedur Panduan Kerja Selamat' pemanduan
	badang/tractor to all respective drives had been conducted on 21/10/2022.
	3. The training was included briefing on the importance of wearing personal protective equipment (PPE) and 'Prosedur Panduan Kerja Selamat' for respective vehicle drivers.
	4. Estate management had brief the mandore for the respective gang on requirement to bring a copy of SDS for respective chemical and Clean Water during spraying activities.
	5. Estate management has conducted refresher training for mandore as per requirement.
Root cause analysis:	1. Lack of monitoring by estate management on wearing PPE and inadequate of training on the importance of PPE usage among the sprayers.
	2. Lack of monitoring by estate management on wearing rubber shoes for Mechanical Buffalo (MB) Driver Tractor and Kubota Driver.
	3. Inadequate of training on the importance of PPE usage among the harvesters.
Corrective Actions:	1. Refresher training will be conducted in every 3 months interval for all workers as per training plan.
	2. Random weekly inspection by field staff in estate during working hours, and the respective workers without appropriate PPE will not be allowed to work as per checklist. The respective reluctant workers will be recorded to monitor their PPE usage compliance.
Assessment Conclusion:	The correction and CAP have been accepted. Evidence submitted was verified and found to be sufficient to close the NC on 16/01/2022. Continuous implementation will be further verified in the next assessment.



Verification Statement	From the visit 2 business unit Labis Bahru and Palong Estate, verified the refresher training plan as per in the corrective actions for the previous NC has been implemented.
	During site visit and interview session with harvesting gang at block P98 block 2, spraying gang at block P99 block 4, Labis Bahru Estate, harvesting at gang block P04 block 3, manuring gang at P12 block 6, Palong Estate, verified from each gang of the activities, the PPE wearing are as per in the SOP. For spraying gang verified the mandore has bring the SDS for Supershate 41 and G Met chemical in Labis Bahru Estate and also SDS for MOP fertilizer.
	From the sample check Palong Estate, the weekly inspection check by field staff on the PPE wearing during working hours also been implemented. Thus, major NC was remained closed.

Non-Conformity Report			
NCR Ref #:	2263250-202210-N1	Issue Date:	20/10/2022
Due Date:	19/10/2023	Date of Closure:	19/10/2023
Area/Process:	Palong Cocoa Palm Oil Mill	Clause & Category: (Major / Minor)	MSPO 2530 Part 4: 4.4.4.2 (a) Minor
Requirements:	The occupational safety and health plan should cover the following: a) A safety and health policy, which is communicated and implemented.		
Statement of Nonconformity:	The Safety and health pr	rocedure was not fully imp	plemented.
Objective Evidence:	During site visit at CPO despatch station, it was noticed that 1 Tanker driver with registration number JLR8698, climb up the tanker without wearing safety harness and safety shoes. Based on the interview with operator there, the unsafe act was done by the driver himself and refuse to follow normal safe work procedure. Based on interview, Normal practice was the Lab Operator will climb up the tanker with complete PPE for CPO filling process. It was not in line with SOP Pengisian CPO Dan Kernel (Makmal) PPPOM/SWP/13 dated 05/03/2020 Section 4 (a) Pekerja Makmal yang telah lengkap memakai PPE akan menurunkan jambatan yang menghubungkan tanker dan platform. Pemandu akan berada di platform yang di sediakan semasa kerja pengisian minyak di lakukan, and Section 6. PPE a) Topi Keselamatan, b) Kasut Keselamatan, c) Safety Harness and d) Sarung Tangan.		
Corrections:	SOP Pengisian CPO basis.	Dan Kernel and strict er	nker driver and Lab operator on forcement will be done on daily
	(Makmal) lakukan,	and Section 6. PPE a	SOP Pengisian CPO Dan Kernel) Topi Keselamatan, b) Kasut rung Tangan respective vehicle
Root cause analysis:	'	,	on safety on working at height. n PPE usage during CPO filing
Corrective Actions:	HIRARC for working at updated on 30/11/2022.	5 ,	nd CPO filling process had been



Assessment Conclusion:	The CAP is accepted, further verification will be done in the next audit.	
Verification Statement	During site visit to Palong Cocoa Palm Oil Mill, verified the HIRARC for working at height, CPO despatch and CPO filling has been updated on 30/11/2023. The HIRARC was review lead by the Assistant Mill Engineer, assist by 5 accessors from mill staffs,	
	Engine Driver	
	Mill Supervisor 1	
	Mill Supervisor 2	
	Chargeman	
	Grading Supervisor	
	The new HIRARC was include "Safety Harness" as a part of the PPE during the work activity. The HIRARC also been review on 27/03/2023 and approved and signed by the Mill Manager.	
	from the observation during site audit on the current progress of work for CPO illing for tanker number BGS 6927, verified the sample boy/lab operator are suit up with proper	
	Safety Helmet	
	Safety shoes	
	Safety Harness	
	Safety Glove (Leather)	
	Thus, Minor NC was effectively closed on 19/10/2023	

Non-Conformity Report			
NCR Ref #:	2263250-202210-N2	Issue Date:	20/10/2022
Due Date:	19/10/2023	Date of Closure:	19/10/2023
Area/Process:	Palong Cocoa Palm Oil Mill	Clause & Category: (Major / Minor)	MSPO 2530 Part 4: 4.6.3.2 Minor
Requirements:	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.		
Statement of Nonconformity:	The payment to the contractor was not made according with the agreed timeline.		
Objective Evidence:	During document review, it was noticed that payment made for the contractor (Kluang Practical Engineering, Date: 26/06/2022) were lapse by 9 days against the agreed timeline payment terms. Latest payment: Invoice No: 2209007 dated 13/09/2022, PV No: 22000883 dated 23/10/2022 (Term of payment: 30 days after issuance of Invoice). It was not according to Contract No: MPSB/C1/41/6(2022) dated 26/06/2022 Section 6.0 Term of Payment: MPSB Agrees to pay the company by progress payment in consideration of the company's undertaking of the said contract within thirty (30) days from the date of receipt of the undisputed invoices supported with the relevant and incidental documentary evidence that has been certified as completed and satisfactory by the Superintending Officer.		
Corrections:	Mill management will notify to CFD on each due date of the payment shall be made to contractor. Mill Management will ensure all data of respective contractor is send to CFD within 1 week on each instalment period.		



Root cause analysis:	Lack of monitoring and follow up with regards to process of remittance for contractor payment.	
Corrective Actions:	To discuss with Procurement department on this issue on payment terms duration.	
Assessment Conclusion:	The CAP is accepted, further verification will be conducted in the next audit.	
Verification Statement	Refer correspondence email between Head of department Sustainability with Head of finance department dated 06/12/2022 until 13/12/2022. Stated in the email the payment duration from 30 days have been revised to 45 days.	
	Sample 1 Contractory Voyage Entoyages Sdn Bhd	
	Contractor: Yexxxx Entexxxxxx Sdn Bhd	
	Job: CPO Transporter Validity: 01/06/2023 to 30/06/2024	
	Invoice date: 31/08/2023	
	Reference: YT23XX-000XX	
	Payment date: 25/09/2023	
	Sample 2	
	Contractor: Txx Txxx Kxxx Sdn Bhd	
	Job: CPO Transporter	
	Validity: 01/06/2023 to 30/06/2024	
	Invoice date: 31/08/2023	
	Reference: TV23XX00XX	
	Payment date: 24/09/2023	
	Thus, Minor NC was effectively closed on 19/10/2023.	

Opportunity For Improvement			
Ref:	N/A	Clause:	MSPO Part: 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)
2407208-202310-N1	4.5.5.1 Part 3 Minor	19/10/2023	Open

3.5 Issues Raised by Stakeholders

IS#	Description
1	Issues:
	School's Representative (SK Kemedak & SK Melayu Raya)



They informed that they have good relationship with the management. Assistance was provided by the management whenever requested. Donation has been made by the management upon request.

Management Responses:

Management will continue to maintain good relationship with the stakeholders.

Audit Team Findings:

No further issue.

2 Issues:

Contractors (LX EXXXXXXXXX, SXXXXXXXX EXXXXXXX, & NXXX BXXXXX EXXXXXXX)

Contractors has been given training related MSPO. Monitoring on implementation of Safety and Health elements has been made. They informed that the payment was made promptly. They are aware of the complaint procedure and so far, they have no issue with the management. There is no complaint recorded.

Management Responses:

The management will ensure the payment will be made accordingly.

Audit Team Findings:

No other issue.

3 Issues:

Workers' Representatives

Awareness on MSPO was in order. Workers has been provided a training related their job task. The workers are satisfied with the management, and they informed that their wages have achieved Minimum Wage Order 2022. They are aware of the complaint procedure. No discrimination from the management.

Gender Committee Representatives

WOW committee has been established in order to discuss any matters related female gender. No sexual harassment or violence case reported during the time of assessment. They are aware of the function of the committee and informed that no discrimination from the management regardless of gender.

Management Responses:

The management will ensure comply to legal requirements and respect all the workers without discrimination.

Audit Team Findings:

No other issue.

4 Issues:

Government Agencies (Jabatan Tenaga Kerja)

Interview has been made with JTK to get clear understanding on new regulation that coming into force. As document verification on the payslip and workers agreement, there is no issue found by JTK. JTK have good relationship with Palong Cocoa POM certification units.

Management Responses:

The management will ensure comply to legal requirements related labour Act and continue on good relationship with JTK.

Audit Team Findings:

No other issue.

5 Issues:



Workers' Representatives

The workers are satisfied with the management, and they informed that their wages have achieved Minimum Wage Order 2020. They are aware of the complaint procedure. No discrimination from the management.

Gender Committee Representatives

No sexual harassment or violence case reported during the time of assessment. They are aware of the function of the committee and informed that no discrimination from the management regardless of gender.

NUPW Representative

Management has supported the employee who want to join Union. Meeting has been conducted and any matters that required management involvement has been discussed. There is no restriction to employee to join Union.

Management Responses:

The management will ensure comply to legal requirements and respect all the workers without discrimination.

Audit Team Findings:

No other issue.

6 Issues:

Villagers Representative (JPKK Kampung Melayu Raya & JPKK Kampung Sepang Loi)

Community has good relationship with estates and mill. Donation and assistance have been given especially during flood season. Based on interview confirmed that there is no issue on land dispute. Stakeholders meeting was conducted in order to have two-way communication between mill and estate with community.

Management Responses:

The management will ensure good relationship maintained between both parties.

Audit Team Findings:

No other issue.

7 Issues:

Neighbouring Estate & Mill (PPNJ Bukit Bujang Mill and PPNJ Bukit Bujang Estate)

There is no issue on land dispute between neighbouring estate and mill. Management of PPNJ haven good relationship with Johor Plantations Berhad. They got assistance by Mill on the issue of weightage calibration using Mill Weighbridge for reconciliation.

Management Responses:

The management will ensure good relationship maintained between both parties.

Audit Team Findings:

No other issue.

8 Issues:

Canteen and Grocery Shop

Acceptable rent has been charged to them. Owner has complied all related requirement such as Permit and necessary matters. Price has been displayed at their shop and the difference with outside provider was acceptable. There is no complaint recorded to the management. Awareness on MSPO was acceptable.



Management Responses:
The management will ensure good relationship maintained between both parties.
Audit Team Findings:
No other issue.

3.6 List of Stakeholders Contacted

Government Officer:	Community/neighbouring village:
Jabatan Tenaga Kerja	JPKK Kampung Melayu Raya
SK Kemedak	JPKK Kampung Sepang Loi
SK Melayu Raya	PPNJ Bukit Bujang Estate
	PPNJ Bukit Bujang POM
Suppliers/Contractors/Vendors:	Worker's Representative/Gender Committee:
LX EXXXXXXXXX	Workers Representative
SXXXXXXX EXXXXXXXXX	Gender Committee Representative
NXXX BXXXXX EXXXXXXXX	NUPW Representative

Section 4: Assessment Conclusion and Recommendation

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

Based on the findings during the assessment *Johor Plantations Berhad – Palong Cocoa POM* Certification Unit complies with the *MS 2530-3:2013 and MS 2530-4:2013*. It is recommended that the certification of *Johor Plantations Berhad – Palong Cocoa POM* Certification Unit is continued.

Acknowledgement of Assessment Findings	Report Prepared by					
Name:	Name:					
WAN ADLIN WAN MAHMOOD	NOR HALIS ABU ZAR					
Company name:	Company name:					
JOHOR PLANTATIONS BERHAD	BSI SERVICES MALAYSIA SDN BHD					
Title:	Title:					
GENERAL MANAGER	CLIENT MANAGER					
Signature:	Signature:					
must albeit warm	to the second of					
Date: 26/11/2023	Date: 06/11/2023					



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

Criterio	n / Indicator	Assessment Findings	Compliance
4.1 Princ	ciple 1: Management commitment & responsibility		
Criterior	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 -	Policy for the implementation of MSPO has been established. Refer https://johorplantations.com/wp-content/uploads/2023/09/MSPO-policy.pdf Mentioned in the policy that the management is committed to implement all the requirement set out by the Malaysian Sustainable Palm Oil (MSPO) and cover all the element required. Policy briefing has been conducted: Labis Bharu Estate: 12/01/2023 Palong Estate: 07/07/2023	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	Mentioned also in the policy that the management of Johor Plantations Berhad is committed to achieve balance between people, planet and profit in all management decision and operation through continual program in line with the commitment to produce sustainable palm oil products.	Complied
Criterior	4.1.2 – Internal Audit		
determine the strong and weak points and potential area for "Inter		Internal audit procedure has been established in the document title "Internal audit" document number SQD/SMS/3.2 dated 01/08/2020 issuance number 01. Stated in the procedure that the internal audit	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	- Major compliance -	was planned to be conducted at the frequency at least once within 12 months (before the expiry of the certificate).	
		There is evidence that the internal audit has been conducted on annual basis. Notification for internal audit has been distributed to all operating units prior to the audit. Refer letter dated 31/05/2023 with reference number SID/SD/ADMIN/015/25: RSPO, MSPO, ISCC Internal Audit Schedule – Full Audit Certification by SID Dept 2023	
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 has been established in the document title "Internal audit" document number SQD/SMS/3.2 dated 01/08/2020 issuance number 01. The outcome of the audits has been compiled in the document title "Internal audit, non-conformance report". The audit results were signed accepted by the estate manager.	Complied
		There is evidence of the internal audit checklist which listed has list down of document requirement and status of each indicator for each operating unit and has been verified by the auditor.	
		Internal Audit has been conducted as below:	
		Labis Bahru Estate: 14/09/2023 = 2 NC	
		Palong Estate: 12/09/2023 = No Findings	
		Identification of root cause, Correction and Corrective action has been recorded for the NC Raised. All issue has been closed accordingly.	
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	There is evidence of the internal audit checklist which listed has list down of document requirement and status of each indicator for each operating unit and has been verified by the auditor.	Complied
		The outcome of the audits has been compiled in the document title "Internal audit, non-conformance report". The audit results have been signed accepted by the estate manager.	



Criterio	n / Indicator	Assessment Findings	Compliance
Criterior	4.1.3 – Management Review		
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	The management of Johor Plantations Berhad has established internal procedure for management review and has been document in the document number SQD/SMS/3.1 dated 01/08/2020 title "Management review". Mentioned in the procedure that management review needs to be conducted at least once a year. Management review meeting was conducted as below: Labis Bahru Estate: 15/09/2023 Palong Estate: 23/09/2023 Issues that have been discussed during the management review were: 1. Chairman remarks 2. Follow up actions from management review 3. Process performance and product conformity 4. Customer feedback 5. Changes that could affect management system 6. Result of internal audit 7. Results of external audit 8. Continuous improvement plan 9. Complaint and grievances 10. Updates and Other matters	Complied
Criterior	4.1.4 – Continual Improvement		
4.1.4.1	The action plan for continual improvement shall be based on	Both the 2 estates have established continual improvement plan	Complied



Criterion / Indicator		Compliance		
consideration of the main social and environmental impact and opportunities of the company.			30/04/2023 upon consideration of the social, nvironmental impacts. Among other efforts are:	
- Major compliance -	Program		Action /Initiatives	
	1	OSH Practices	Safety Signage - Installation pro base road	
			Workstation - Repainting floor and bind	
			Workshop - Repainting wall	
	2	Social	Housing - Repaint workers houses 20 units	
			Upgrade surau	
			Repair drainage at workers quarters	
	3	Environmenta	Biodiversity - Replace signage at hot spot	
			IPM - Beneficial planting at P12	
			Erosion control - Sand bag installation at bridge	
			P12	
	4	Labour ratio	Expansion of in-field FFB collection - grabber	
			Expand mechanization in manuring	
	5	Productivity	Fixing new culvert	
			Purchase 3-unit grabber	
	Def	tails of expend	liture are provided in respective estates under both	
	CA	PEX/OPEX. Inc	clusive are projects for improvement as described	
	bel	ow among oth	ers.	
		Sections	Description - Labis Bahru Estate	
	1	Facilities	Refurbishment workers Q - RM495 - 2023	
	2	Facilities	1 New surau toilet women - RM9.5K - 2023	
	3		Probase road 1 km housing complex - RM 88K - 2023	
	4		Water gate - replanting P 23 - RM60K -2023	
		Sections	Description - Palong Estate	



Criterio	on / Indicator	Assessment Findings	Compliance			
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 -	1 Facilities 1 new toilet - RM20.5K - 2023 2 Facilities Replace asbestos ceiling 10 units WQ - RM207K - 2023 3 Facilities Replace ceiling 10 units WQ - RM141K - 2023 4 Facilities Probase Road 0.5 km RM40K - 2023 5 Operation New machine 2 units c/w grabber - RM220 - 2023 This is being made upon confirmation of any new projects. Employees were briefed of any new development in basic understanding during the weekly briefings. a) The management team will be informed of such development during the monthly management meetings. b) Dissemination of information by the RC and Head Office transacted during the monthly Managers meetings and emails. c) The management continuously reviewed the estates performance and work method for a continual improvement to achieve better results yield and costings.	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. The issue being included in the estates monthly meeting.	Complied			
4.2 Princ	4.2 Principle 2: Transparency					
Criterion	n 4.2.1 – Transparency of information and documents relevan	at to MSPO requirements				
4.2.1.1	The management shall communicate the information requested	Procedure for Transparency has been established. Refer	Complied			



Criterio	on / Indicator	Assessment Findings	Compliance
	by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes. - Major compliance -	Transparency Procedure with reference number SQD/SMS/1.0 dated 01/08/2020. The management has conducted the stakeholder meeting for external stakeholder. The meeting was invited such as contractor, supplier, primary school, smallholder and NGO for communicate and discussion any issue related on the MSPO and RSPO. There is positive feedback from the stakeholder meeting. A combine stakeholder meeting for Palong Complex (Northern Region) was conducted on 09/10/2023 through physical meet at VIP Hotel, Segamat. The stakeholders that involved such as government authorities, contractors, suppliers, neighboring plantations, and local communities. Sighted minutes of meeting, attendance and photos.	
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 -	Refer Transparency Procedure with reference number SQD/SMS/1.0 dated 01/08/2020. Stated in the Section 4.0 This procedure will be in place to ensure that all relevant documents are available and kept up to date with regards to transparency. This will further identify all relevant information to be made available to demonstrate transparency. This documentation will be available in appropriate languages i.e. English and Bahasa Malaysia The operating units and respective department will ensure that the following documents are available if requested and they do not impinge on confidentiality and will not cause detrimental Sustainability or social outcomes.	Complied
		The management has display documents for public information and notification. There were sighted the some of document display at notice board for public information. Any stakeholder also can get information by reviewing the public documents.	
		It was sighted the following evidence displayed on the notice board: an OSH Management Plan, an Environment Management Plan, a Social Management Plan, a Company Policy, a Complaint Form, and a	



Criterio	on / Indicator	Assessment Findings	Compliance
		Complaint Procedure. Listed all the document/information that can be requested by the interested parties but not limited to such as: a. Land title/ user rights b. Occupational safety and health plan c. HCV documentation d. Detail of complaint or grievances. e. Details of complaints or grievances f. Continuous improvement plan g. HCS documentation	
Criterio	n 4.2.2 – Transparent method of communication and consulta	tion	
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	Procedure for consultation and communication has been established. Refer Consultation and Communication Procedure with Doc. No.: SQD/SMS/1.1 dated 01/08/2020 to ensure management has an open and transparent communication methods with local communities and otherinternal & external stakeholders. Modes of the communication are such as muster, meetings, campaigns, suggestion boxes, letter, email, social media, face to face communication and etc.	Complied
4.2.2.2	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. - Minor compliance -	Assistant Manager for Labis Bharu Estate and Palong Estate has been appointed as Social Person In-charge and appointment letter dated January 2023 was sighted.	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.	List of stakeholders has been established. Updated on list has been made on 15/10/2023 for Labis Bahru Estate and 30/09/2023 at Palong Estate. Listing has been included has included Government Department, Buyers Company, Association, Union, Corporation,	Complied



Criterio	on / Indicator	Assessment Findings	Compliance				
	- Major compliance - Contractors, Suppliers, Service company, Utilities company, Shopkeepers, Hospital / Clinic, Bank Institution, Courier services, school, Inter estate, other community. A combine stakeholder meeting for Palong Complex (Northern Region) was conducted on 09/10/2023 through physical meet at VIP Hotel, Segamat. The stakeholders that involved such as government authorities, contractors, suppliers, neighboring plantations, and local communities. Sighted minutes of meeting, attendance and photos. There is no issue raised during the stakeholder meeting session.						
Criterio	1 4.2.3 – Traceability						
4.2.3.1	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). - Major compliance -	 An SOP has been established with ref no SQD/SMS/2.1, dated 17/02/2022, issue 1, rev.06. Therein describing information of; a) Person in charge is the respective Estate Managers at time of tenure appointed via letter dated 08/09/2023 issued by the Head of Sustainability and Innovation Division. b) FFB flow chart from estate harvesting designated block to mill weighbridge (tickets). The mill processing records the total FFB processed for the day and the storage tank no being stored. The records include opening FFB balances in ramp and cages plus the FFB intake from the estates for the day less the closing FFB balances will provide the total processed. 	Complied				
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	The estates maintained daily production records as described in 4.2.3.1 above in compliance to the procedure FFB flow chart from estate harvesting designated block to mill weighbridge (tickets). The mill processing records the total FFB processed for the day and the storage tank no being stored. The records include opening FFB balances in ramp and cages plus the FFB intake from the estates for	Complied				



Criterion / Indicator			Assessment Findings							Compliance
		All red	cords		ntained i	n both	estates		al processed. summarized	
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	08/09 Division	The Managers of respective estates were appointed via letter dated 08/09/2023 issued by the Head of Sustainability and Innovation Division as the PIC for traceability. The appointment letters were sighted and verified.						Complied	
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	transa inform a) W b) De c) De d) Gi	actionnation leighl - Da - To espat - Se eliver - Da radin	n to the non. bridge tick te / D/O tal Bunch tch chit rial no / f ry Note ite/ weigh g report	nill. The ket no / Qua nes / Qua field no /	set of antity / ality / find of a fidge of the constant of the	w/bridge eld no bunches / perator / I signment	operator naive tractor no. Yence if any Vehicle No BEB8419 BEB8419 BEB8419		Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4.2 Point	ainle 2. Compliance to local very increase.	Palong Estate Date D/O Type Qty/mt Vehicle No Mill 1 29/3/23 06606 FFB 10.970 LP 014 PCPOM 2 03/6/23 07107 FFB 12.900 LP 014 PCPOM 3 16/9/23 70401 FFB 10.770 LP 014 PCPOM 4 26/8/23 70055 FFB 9.530 LP 014 PCPOM 5 8/10/23 70739 FFB 10.669 LP 014 PCPOM	
	n 4.3.1 – Regulatory requirements		
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. - Major compliance -	Estates has documented all Licence, permit and applicable Law and Regulations to ensure compliance towards all applicable local, national and ratified international laws and regulations. The compliances is guided by the document Sustainable Management System; Compliance To Legal Requirement; Document Number: SQD/SMS/2.0; Document Date: 01/08/2020; Issue: 01. Among permit and license sampled were: Labis Bahru Estate 1. MPOB Licence # 621313002000 valid from 12/09/2023 until 30/09/2023 2. Diesel Licence #JH(SGT)0286/22 PSK valid from 19/09/2023 until 30/11/2025 3. Deduction Permit for Khairat #PP3/29/051/2009 dated 12/09/2023 4. Deduction permit for Masjid/Surau/Masyarakat/Sukan	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		#PP3/29/005/2009 dated 12/09/2023	
		5. Firearm Permit #A168941 valid from 12/09/2023 until 28/05/2024	
		6. Air compressor #JH PMT 18012 valid until 10/12/2024	
		7. Weighbridge calibration #B2166462 inspected by De Metrology dated 01/08/2023	
		8. Petrol Licence #SKK/11-20/B(12) valid from 12/07/2023 until 11/07/2024	
		Palong Estate	
		1. MPOB Licence #570585002000 valid from 11/05/2023 until 31/03/2024	
		2. Diesel permit #JH(SGT)0012/88/PSK valid from 25/08/2022 until 24/08/2025	
		3. Air Receiver #JH PMT 94868 valid until 03/07/2024	
		4. Water Abstraction Licence #BAKAJ/334/430/2/6/3/2 valid until 31/12/2023	
		5. Deduction permit for electricity #TK(NJ)U-24 dated 12/08/2018	
		6. Fire Arm Permit #A170101 valid until 15/05/2024	
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register. - Major compliance -	Certification unit continued to implement and maintain their established documented system for identifying, accessing, tracking updates and monitoring of compliance with the legal requirements that are applicable to the CU's operation.	Complied
		Each office of the operating unit (estates) has its own legal requirements register (LRR) and were being evaluated individually from time to time for compliance mainly through internal audit. Among the applicable legal laws registered are EQA, OSHA, Factory &	



Criterion / Indicator		Assessment Findings	Compliance
		Machinery Act, Employment Act, and Workers' Minimum Standard of Housing and Amenities Act. Latest updated has been done on 31/08/2023 with updating Of Minimum wages Order 2022, Employees Provident Fund (Amendment No. 2) Rules 2022, Employees Provident Fund (Amendment Of Eight Schedule) Order 2022 and Prevention And Control Of Infectious Disease (Measures Within Infected Local Areas) (National Recovery Plan) (Transition Phase To Endemic) 2022.	
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 -	Monitoring on the compliance towards the requirement register has been done by Executive Regional Controller. Refer Kulim Group Compliance Framework dated 30/09/2023. Among the medium used in updating the legal register were websites, subscription to legal information provider and mass media.	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 -	The Executive Regional Controller of Northern Region has been appointed as the person in-charged, (ref.: appointment letter (25) RMC/COM/GM/2022/25, dated 21/07/2022) to be the person responsible to monitor compliance and to track and update the changes in regulatory requirements. The letter was from the Head of Governance Division of KMB.	Complied
Criterio	n 4.3.2 – Lands use rights		
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. - Major compliance -	Management has ensured that their oil palm cultivation do not diminish the land user rights of other users. It was confirmed during site visit and interview with relevant stakeholder during the audit. The legitimacy of ownership of the estate belong to Kulim (M) Bhd group.	Complied
4.3.2.2	The management shall provide documents showing legal	Management has provided documents showing the legal ownership	Complied



Criterion / Indicator	Assessment Findings	Compliance
ownership or lease, history of land tenure and the actual use of	of their land. Sighted evidence of list of land title and quit rent	
the land.	payment evidence.	
- Major compliance -	Labis Bharu Estate has total of 20 land titles. Sample verified as below:	
	Sample 1	
	District: Segamat	
	Grant No: GM 2XX	
	Lot No: Lot 608	
	Sample 2	
	District: Segamat	
	Grant No: GM 2XX	
	Lot No: Lot 623	
	Sample 2	
	District: Segamat	
	Grant No: GM 2XX	
	Lot No: Lot 623	
	Palong Estate has total of 4 land titles. Sample verified as below:	
	Sample 1	
	District: Segamat	
	Grant No: HSD 52XXX	
	Lot No: PTD 15680	
	Sample 2	
	District: Segamat	
	Grant No: HSD 52XXX	



Criterio	n / Indicator	Assessment Findings	Compliance
		Lot No: PTD 15679	
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	that have been physically located and marked. Inspection of boundary stones/markers/trenching at the 2 estates, during the field inspection confirmed that they were clearly marked and maintained.	Complied
		Estate Field Neighbouring properties 1 Labis Bahru P 23 IOI Segamat	
		2 Labis Bahru P 08 - B1 Kg Melayu Raya	
		3 Labis Bahru P 03 - B3 FELCRA Pogoh	
		D Lable Ballia 1 00 Bb Lebit (1 dgell	
		1 Palong P13 - B1 PPNJ Bukit Buyong	
		2 Palong P12 - B1 PPNJ Bukit Buyong	
		3 Palong P08 - B3 Kg Balai Badang	
		4 Palong P06 - B1 Kg Puting	
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There is no land dispute in the Labis Bahru Estate, and Palong Estate at the time of audit. The land belongs to Kulim (Malaysia) Berhad and land ownership documents verified.	N/A
Criterion	4.3.3 – Customary rights		
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	There is no customary land or negotiated agreements within the Sungai Papan Estate, and REM Estate. Land area confirmed through document reviewed and interviewed with the communities.	N/A



Criterio	n / Indicator	Assessment Findings	Compliance
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	There is no customary land or negotiated agreements within the Sungai Papan Estate, and REM Estate. Land area confirmed through document reviewed and interviewed with the communities.	N/A
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	There is no customary land or negotiated agreements within the Sungai Papan Estate, and REM Estate. Land area confirmed through document reviewed and interviewed with the communities.	N/A
4.4 Prince	ciple 4: Social responsibility, health, safety and employ	yment condition	
Criterion	1 4.4.1: Social Impact Assessment (SIA)		
4.4.1.1	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	Sustainability & Quality Department has carried out Social Impact Assessment on 13/10/2022 as per the Standard Operating Procedure title Social Impact Assessment (Doc No; SQD/SMS/3.6, Date: 01/08/2020). The checklist has been sent to the estates management and filled in by the workers and the contractors. The social impact registeris developed based on the scoring of frequency, consequence and likelihood. Social Management Plan will be developed after the social impact register established. The last review of the social management plan was on 11/10/2023 promotion actions were taken accordingly to the impacts identified. The outline of the management plan as below: 1. Issue 2. Improvement Plan 3. Action taken 4. Person in charge 5. Observation	Complied



Criterio	on / Indicator	Assessment Findings	Compliance			
Criterion 4.4.2: Complaints and grievances						
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	The system to dealing with complaint and grievances has been established. Refer Grievance Procedure with Doc. No.: SQD/SMS/4.1 dated 01/08/2020 to ensure management has a documented system for dealing with complaints and grievances that is agreeable to all sides and accepted by all stakeholders. Besides, management has developed Grievance Policy dated 07/12/2021 to ensure that there is a transparent process for ensuring stakeholder's grievances and complaints are dealt with fairly, consistently, and promptly. Briefing of the grievance policy and procedure was conducted during	Complied			
		stakeholder meeting.				
timely and appropriate manner that is accepted by all parties. - Major compliance - El St		The system to dealing with complaint and grievances has been established. Refer Grievance Procedure with Doc. No.: SQD/SMS/4.1 dated 01/08/2020 to ensure management has a documented system for dealing with complaints and grievances. Labis Bahru Estate and Palong Estate has implemented Suggestion/ Complaint form & Enquiry Register Book to record any grievances from external stakeholders and Complaint Book for workers. Sample of complaint record as below:	Complied			
		Labis Bahru Estate Sample 1 Complainant: Date: 03/09/2023, House No 42, Issue: Toilet Problem, Issue has been solved on 05/09/2023 Sample 2 Complainant: Date: 24/05/2023, House No 80, Issue: Joint Valve Out				



Criterio	on / Indicator	Assessment Findings	Compliance
		Of Order, Issue has been solved on 28/05/2023 Palong Estate Sample 1 Complainant: Date: 09/10/2023, House No 89, Issue: Sink Problem, Issue has been solved on 09/10/2023 Sample 2 Complainant: Date: 08/08/2023, Post Guard, Issue: Request	-
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 -	Additional Lamp, Issue has been solved on 09/08/2023 Complaint/ Suggestion Box was available in front of the office and in front of the security post in Labis Bahru Estate and Palong Estate. The stakeholders and workers are aware of the complaint box as a method to lodge complaint.	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 -	Complaint/ Suggestion Box was available in front of the office and in front of the security post in Labis Bahru Estate and Palong Estate. The stakeholders and workers are aware of the complaint box as a method to lodge complaint.	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 -	Refer record "Buku Kerosakan & Pembaikan Perumahan" and Enquiry Register Record. Complaint/ Enquiry Register records since 2018 were maintained.	Complied
Criterion	1 4.4.3: Commitment to contribute to local sustainable develo	pment	
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - Minor compliance -	Estate has made contribution to local development in consultation with the local communities. Sighted record of CSR activities. <u>Labis Bahru Estate</u>	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		 Donation to PIBG SK Melayu Raya dated 25/01/2023 Donation for Sport Day MSSD Segamat dated 13/08/2023 Tractor Service on maintenance work for Kampung Genuang Baru dated 11/05/2023 Palong Estate Donation to SK Kemedak dated 05/10/2022 Van services for Sport Day – North Region dated 01/03/2023 	
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 -	Occupational Safety and Health Policy dated 01/10/2021 has been established which in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139). The policy was signed by the Managing Director of Kulim (Malaysia) Berhad. The new policy has just been emailed to every estate on 14/10/2023 but not yet finalized by the company. Among the method of communication are through morning muster briefing, training, and display on notice. Labis Bahru Estate planned to brief the OSH Policy on 17/10/2023, verified the announcement letter to the workers. For Palong Estate the briefing on the OSH Policy has been done on 10/03/2023 during muster at muster ground attend by 106 participants. The policy was signed by the Managing Director of Kulim Malaysia Berhad and can also be found at https://johorplantations.com/sustainability/	Complied
4.4.4.2	The occupational safety and health plan shall cover the following: a) A safety and health policy, which is communicated and	a) Occupational Safety and Health Policy dated 01/10/2021 has been established which in line with Occupational Safety and	Complied



Criterion / Indicator	Assessment Findings	Compliance
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 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.	Health Act 1994 and Factories and Machinery Act 1967 (Act 139). The policy was signed by the Managing Director of Kulim (Malaysia) Berhad. Labis Bahru Estate planned to brief the OSH Policy on 17/10/2023. For Palong Estate the briefing on the OSH Policy has been done on 10/03/2023 during muster at muster ground attend by 106 participants. Among the method of communication are through morning muster briefing, training, and display on notice boards. b) The assessment of risk is documented and recorded in HIRARC and CHRA. The sampled estates have made both documents available for verification. The HIRARC is reviewed from time to time depending on current situation such as occurrence of occupational safety & health incident or accident. Latest review was conducted on: Labis Bahru Estate: 14/09/2023 Palong Estate: 21/09/2023 Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. Labis Bahru Estate - The Chemical Health Risk Assessment Report (Ref. Number: JKKP HQ/03/ASS/00/154-2018/054) conducted by QMSPRO Sdn Bhd on 08/08/2 -13/08/2018 already expired. The new CHRA assessment was done in April to May 2023. The assessment for Labis Bahru Estate was set on 09/06/2023. The assessment was done by Kulim Safety Training and Services Sdn Bhd. From the email dated 27/09/2023 on	

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Criterion / Indicator	Assessment Findings	Compliance
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 -	updating the current situation and the Gantt Chart CHRA Kulim 2023. From the Gantt Chart the report will be completed on week 27. Submission to state DOSH is on week 29. Palong Estate - The Chemical Health Risk Assessment Report (Ref. Number: JKKP HQ/03/ASS/00/154-2018/050) conducted by QMSPRO Sdn Bhd on August 2018 and Supplementary CHRA Report dated February 2021 (Ref. Number: JKKP HQ/03/ASS/00/154-2021/009) was available for verification. The new CHRA assessment was done in April to May 2023. The assessment for Labis Bahru Estate was set on 09/06/2023. The assessment was done by Kulim Safety Training and Services Sdn Bhd. From the email dated 27/09/2023 on updating the current situation and the Gantt Chart CHRA Kulim 2023. From the Gantt Chart the report will be completed on week 27. Submission to state DOSH is on week 29. Medical Surveillance was conducted for workers exposed to chemicals and fertilizer in the estate as recommended in the CHRA. The medical surveillance was conducted to monitor the level of exposure on the workers towards the chemicals and fumes. Labis Bahru Estate - Medical Surveillance was conducted on 19/09/2023 at U.n.i Klinik Permas Jaya that involved 9 workers. Result indicates that all workers condition were fit to work. None of the works were unfit or requiring MRP. All workers exposed to pesticides had biological monitoring all of which were normal. None of the workers had occupational related diseases. Palong Estate - Medical Surveillance was conducted on	



Criterion / Indicator		Assessi	ment Findin	gs		Compliance
		02/08/2023 at U.n.i Klinik Permas Jaya that involved 55 workers. Result indicates that all workers condition were fit to work.				
	Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019 in the estates. The NRA Reports were available in the sampled estates as below. Labis Bahru Estate – Assessment conducted on 09/06/2023 by NRA Assessor with registration No: HQ/18/PEB/00/00014. The assessment report (Ref. No: HQ/18/PEB/00/00014-2023/012) was available for verification.					
	From the nois	se risk assessi	ment, the resu	Its as below:		
	Similar Comparison between Excessive Noise, Daily Noise Exposure Limit, Maximum SPL and Peak SPL. Group Excessive Daily Noise Maximum Excessive				ık SPL.	
	Field Fogging	(82dBA) Exceeded	(85dBA) Exceeded	(115BA) Not Exceeded	(82dBA) Not Exceeded	
	Field Mist Blower	Exceeded	Exceeded	Not Exceeded	Not Exceeded	
	Palong Estate – Assessment conducted on 07/06/2023 by NRA Assessor registration No: HQ/18/PEB/00/00014. The assessment report (Ref. No: HQ/18/PEB/00/00014-2023/010) was available for verification. Audiometric tests were conducted as per recommendation by the NRA Assessor.					



Criterion / Indicator			Assess	ment Find	lings		Compliance
		Similar Exposure Group		n between osure Limit, N			
		(SEG)	Excessive Noise (82dBA	Daily Noise Lomit (85dBA	Maximu m SPL (115BA	Excessive Noise (82dBA	
		Field Fogging	Exceeded	Exceeded	Not Exceeded	Not Exceeded	
		Field Mist Blower	Exceeded	Exceeded	Not Exceeded	Not Exceeded	
	Labis Bahru Estate – Audiometric test has been conducted or 08/10/2023 for 3 workers, and the result not yet come out. Palong Estate – Audiometric test was required as per NRA assessor. The program for Palong Estate were planned or 08/10/2023. The test has been completed; the report not yet come out. c) Training programme (SQD/SMS/3.7-F1) was established by the management. Evidence of adequate and appropriate training or safe working practices provided to workers was verified, for example:					ome out. d as per NRA e planned on	
						ate training on	
	_	abis Bahru E		ining on 00%	NE/2022		
		 Chemical ERP and 			•		
		3. First Aid	Fraining on (3/09/2023.			
		4. Safety Wo	ork at works	hop training	dated on 13/	/03/2023	



Criterion / Indicator	Assessment Findings	Compliance
	5. Safety work at fertilizer store training date on 21/08/2023.	
	6. Spill Containment – Training date 25/06/2023	,
	Palong Estate	
	1. Spraying Calibration dated 01/11/2023	
	2. Spray HC Buffer Zone – 11/01/2023	
	3. Schedule Waste date on 22/02/2023	
	4. Fertilizer handling – 08/03/2023	1
	5. Chemical handling (internal) date 19/04/2023	,
	6. Tractor Diver MB save driving – 12/07/2023	1
	7. Safety workshop at work and management – 16/08/2023	
	d) Issuance of PPE to employees is recorded in a standard form which has the information about name of employee, type of PPE, workstation, date of issuance and acknowledgment of receipt. Sample latest PPE issuance (safety boot) to worker with ID E1500001525 date 15/06/2023 for Labis Bahru Estate. Sample latest PPE issuance such as safety shoes (27/09/2023), to workers with ID number 810001579, workers with ID 810001333 received safety shoes on 27/09/2023.	
	e) SOP for handling chemical management was addressed in a few procedures such as:	
	i. Weed & Pest Usage and Application Control	
	ii. Fertilizer Usage & Application Control	i
	The procedures outline the handling of chemicals in accordance with the regulation. SDS were made available at the relevant workstations involved in chemical handling such as chemical stores and spraying area.	



Criterion / Indicator	Assessment Findings	Compliance
	<u>Labis Bahru Estate</u>	
	 Supershate 41 – SDS Issued on 13/07/2020 	
	Blocus Beta – SDS Issued on 15/09/2019	
	BM Tricalon – SDS Issued on 10/12/2019	
	 G Met – MSDS Issued on 02/11/2023 	
	BM Rat Gone – SDS Issued on 19/06/2019	
	 Ajib CRF – SDS Issued on 01/12/2020 	
	Palong Estate	
	 Supershate 41 – SDS Issued on 13/07/2020 	
	Blocus Beta – SDS Issued on 15/09/2019	
	BM Tricalon – SDS Issued on 10/12/2019	
	G Met – SDS Issued on 02/11/2023	
	Fertilizer MOP – SDS Issued on 01/01/2022	
	 Borate (Etibor 48) – SDS issued on01/02/2022 	
	 Compacted 10.8 – SDS issued on12/12/2019 	
	f) The respective Assistant Manager Labis Bahru Estate were appointed as the OSH Secretary of the committees based on a letter dated 08/03/2023 [ref.: LLB-20/OSH MEETING-7 from the OSH Chairman. Verified also the acknowledgement on the acceptance of the appointment sign by the new OSH Secretary.	
	The respective Assistant Manager Palong Estate were appointed as the OSH Secretary of the committees based on a letter dated 03/10/2021 [ref.: AJKKP/LP/2021 from the OSH Chairman. Verified also the acknowledgement on the acceptance of the appointment sign by the new OSH Secretary.	



Criterion / Indicator			Assessment F	indings	Compliance
	had bee	n held	I by the estate which	that quarterly OSH meetings the involved the employees and neetings are as follows:	
	OSH Me	eting	Labis Bahru Estate	Remarks	
	1 st Meet	ng	22/03/2023	Attend by 12 employer and 9 employees.	
	2 nd Mee	ing	21/06/2023	Attend by 12 employer and 9 employees.	
	3 rd Meet	ing	19/09/2023	Attend by 12 employer and 9 employees.	
	4 th Meet	ing	Planned on 17/12/2023		
	OSH Me	eting	Palong Estate	Remarks	
	1 st Meet	ng	06/03/2023	Attend by 9 employer and 12 employees.	
	2 nd Mee	ing	18/06/2023	Attend by 13 employer and 12 employees.	
	3 rd Meet	ing	19/09/2023	Attend by 13 employer and 12 employees.	
	4 th Meet	ing	Planned on 11/12/2023		
				emergency are addressed in /PKS/OSH-1, rev. 1, dated	



Criterion / Indicator		Assessment Findings	Compliance
		01/03/2021] and "Prosedur Kecemasan". Among the emergency situations identified are fire breakout, and flood. ERP Training has been conducted on:	
		Labis Bahru Estate: 08/08/2023. Attend by 3 executives, 4 technical staff and 109 workers.	
		Palong Estate: 07/06/2023. Attend by the 2 executives, 5 technical staff and 114 workers.	
	i)	First aid kit provided at various workstations at the estate such as workshop, store, harvesting gangs, maintenance gangs and office. Sample first aid kit from spraying gang and harvesting gang verified the contain are still valid and the number of the item list are adequate. Based on records, the last training on first aid was conducted on:	
		Labis Bahru Estate: 03/09/2023 – Attend by 10 participants. Sighted the attendance and the details on the training and also the training evaluation Training from, Doc. No: SQD/SMS/3.14-F.	
		Palong Estate: 07/06/2023. Attend by 1 technical staff and 7 first aid kit holder. Sighted the attendance and the details on the training and also the training evaluation Training from, Doc. No: SQD/SMS/3.7-F.	
	j)	All accidents are to be investigated and reported to Head Office. Accident was discussed in the Quarterly OSH meeting in order to review necessary SOP and HIRARC. The management has taken necessary action in term of reporting to the authority and addressing the accident causes based on investigation. JKKP 8 report was submitted on:	
		Labis Bahru Estate: JKKP8/133689/2022 submitted on 26/01/2023: 7 accidents with 64 TLA.	



Criterio	on / Indicator	Assessment Findings	Compliance
		Palong Estate: JKKP8/129192/2022 submitted on 16/01/2023:21 accident with 73 TLA.	
Criterio	n 4.4.5: Employment conditions		
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 -		Management has developed policy on good social practices policy. All related policies have been published in the company website under Policies Section. Refer https://johorplantations.com/corporate-governance/ Briefing of the policy was conducted on: Labis Bharu Estate: 12/01/2023 Palong Estate: 07/07/2023	Complied
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - Major compliance -	Management has developed policy on not engage in or support discriminatory practices policy. All related policies have been published in the company website under Policies Section. Refer https://johorplantations.com/corporate-governance/ Briefing of the policy was conducted on: Labis Bharu Estate: 12/01/2023 Palong Estate: 07/07/2023 Based on interview with internal and external stakeholders, management has provided equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.	Complied
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	Management has ensured that their employees pay, and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. Employment contract was signed by the workers. Pay and conditions are documented and above the	Complied



Criterion / Indicator	Assessment Findings	Compliance
on minimum wage Major compliance -	Minimum Wage Order 2022. Sampled of the employment contracts confirmed that terms and conditions are clearly outlined as per NUPW/ MAPA collective agreement and Minimum Wages Order 2022. Refer sample of work agreement and payslip of the month May and August 2023:	
	<u>Labis Bharu Estate</u>	
	1. Employee ID: E1500015XX	
	2. Employee ID: E150000XXX	
	3. Employee ID: E1500004XX	
	4. Employee ID: E1500001XX	
	5. Employee ID: E15000014X	
	6. Employee ID: E1500000XX	
	7. Employee ID: E15000018X	
	8. Employee ID: E1500001XX	
	9. Employee ID: E1500015XX	
	10. Employee ID: E150000X2X	
	Palong Estate	
	1. Employee ID: E8100012XX	
	2. Employee ID: E8100015XX	
	3. Employee ID: E8100021XX	
	4. Employee ID: E81000157X	
	5. Employee ID: E81000227X	
	6. Employee ID: E81000228X	
	7. Employee ID: E1800023XX	



Criterio	on / Indicator	Assessment Findings	Compliance
		8. Employee ID: E18000234X 9. Employee ID: E1800009XX 10. Employee ID: E1800024XX	
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. - Minor compliance -	Management has ensured employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. Estates has engaged contractors for activities such as harvesting of FFB and transporting of FFB. Sample taken as below and payslip of May and August 2023 as below: Labis Bahru Estate Sample 1 Contractor: NXXX BXXXXXXX EXXXXXXX Work: Harvesting FFB Validity: 01/01/2023 to 30/09/2024 Workers 1. Passport No: EA00844XX 2. Passport No: C24872XX Sample 2 Contractor: TXXX WXXX TXXXXXXX Work: FFB Transport to Mill Validity: 01/04/2023 to 30/06/2024 Workers 1. Passport No: EA00844XX	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
Gritario		2. Passport No: E07629XX 3. Passport No: C24872XX Palong Estate Sample 1 Contractor: PXXXXXXXX JXXX CXXXXXXXX Work: Loading and Transporting of FFB Validity: 01/01/2023 to 30/06/2024 Workers 1. Passport No: C87004XX 2. Passport No: C87006XX Sample 2 Contractor: JXXXXXXXXXX EXXXXXXXXX Work: Harvesting of FFB and In Field Collection by using Mini Tractor Scissor Lift Validity: 01/02/2021 to 31/01/2024	
4.4.5.5	The management shall establish records that provide an accurate account of all employees (including seasonal workers	Workers 1. Passport No: EJ0009XXX 2. Passport No: EG0083XXX All the estates have implemented I-Plantation System to record and maintain the everyions of ampleyons in Employee Master. Potails such	Complied
	accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. - Major compliance -	maintain the overview of employees in Employee Master. Details such as full name, gender, date of birth, date of entry, job description and type of wages was found in the system. Besides, a hardcopy of Registration Card/ Employee Card was implemented to fill in all the basic information of the workers.	



Criterio	n / Indicator	Assessment Findings	Compliance
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 employees that recruited by the estates are from local and foreign workers. They are either under direct employment to the management or contractor' workers. All of them have signed on the employment contract prior to work. Terms and conditions were according to MAPA/ NUPW Agreement. Sample workers as per 4.4.5.3.	Complied
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer. - Major compliance -	Estate management was using system K Plant for record all the daily attendance was recorded by checkroll attendance and scan barcode using K-PLANT system on daily basis and overtime was recorded in the Overtime Form. Sample as per 4.4.5.3.	Complied
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.	Interviewed with workers and document reviewed on the Overtime Form as well as payslip shown that the overtime payments are in accordance to law and workers are not forced to work overtime.	Complied
	- Major compliance -		
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.	Wages and overtime were paid according to the overtime form and attendance report. Total hours of overtime and daily attendance has recorded in Attendance report in the system. Sample as per 4.4.5.3.	Complied
	- Major compliance -		
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.	The company provided free medical facilities to all the workers. Subsidized of water and electricity were given to all the workers. Besides, free school uniforms to the children of workers and provide free transportation to send the children of workers to school.	Complied
	- Minor compliance -		
4.4.5.11	In cases where on-site living quarters are provided, these	The workers were provided with free housing facilities, free water	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
	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 -	supply and subsidized of electricity. Estate Hospital Assistant has carried out line site inspection on weekly basis in all sampled estates. Verified that management was in progress to provide new bed with mattress and also cupboard. Sighted evidence in the CAPEX and budget for refurbished the line site. Seen the record of line site inspection latest on October 2023. There was no issue raised during the inspection. The report of inspection will be verified and approved by the AssistarManager and Manager.	
4.4.5.12	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	Management has developed policy on Sexual Harassment and Core Labour Standard Policy. All related policies has been published in the company website under Policies Section. Refer https://johorplantations.com/corporate-governance/ A Women on Ward (WOW) committee was established in the Labis Bahru Estate and Palong Estate and seen the name list of complaint panel for WOW with contact number for the workers to report if there any complaint. Briefing of the function of WOW Panel was conducted during meeting. No issue was reported during the meeting. Interviewed with the female workers confirmed that they are aware of the complaint procedure and informed that no sexual harassment and violence case report so far. Latest meeting recorded on: Labis Bharu Estate: 27/09/2023 Palong Estate: 24/09/2023	Complied
4.4.5.13	The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the	Management has developed policy on respect the right of all employees to form union or join trade union. All related policies has been published in the company website under Policies Section. Refer https://johorplantations.com/corporate-governance/	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
	industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. - Major compliance -	Interviewed with the workers confirmed that they are free to join NUPW without any restriction from management. NUPW meeting between management and union committee was conducted and meeting minutes was sighted. Any concern was discussed during the meeting and action was taken on the issue raised. Latest meeting was sighted on: Labis Bharu Estate: 12/10/2023 Palong Estate: 26/09/2023	
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 and young persons is acceptable on family farms, under adult supervision, and when not interfering with their education. They shall not be exposed to hazardous working conditions. - Major compliance -	Management has developed policy on Children and young persons shall not be employed or exploited. All related policies have been published in the company website under Policies Section. Refer https://johorplantations.com/corporate-governance/ Verified the master list of the workers confirmed that the minimum age of workers employed are 18 years old.	Complied
Criterior	1 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.	Training programmes were available at all the sampled estates. Based on the documented programmes, generally the planned trainings cover the OHS, environmental and best practice aspects of all the operations in the field. Among the training records verified are as follows:	Complied
	- Major compliance -	Labis Bahru Estate:	
		No Training Date 1 Policy Briefing Training 09/01/2023	
		2 Harvesting Training 19/01/2023	
		3 Spraying Training 10/02/2023	



Criterio	n / Indicator		Assessment Finding	S	Compliance	
		4	PPE Training	11/06/2023		
		5	First Aid Training	03/09/2023		
		6	Environment Training	12/07/2023		
		7	Triple Rinsing Training	02/06/2023		
		8	Zero Burning Training	06/07/2023		
		9	Fire Drill Training	08/08/2023		
		10	HCV and Biodiversity Training	19/01/2023		
		11	Chemical Handling	06/10/2023		
		12	Spill Containment	21/05/2023		
		13	Schedule waste	13/06/2023		
		14	Water Sampling	05/02/2023		
		15	Manuring	11/05/2023		
		16	Safety at workshop	13/03/2023		
		17	Tractor Training	18/07/2023		
		Palong E	Estate			
		No	Training	Date		
		1	Policy Briefing Training	07/07/2023		
		2	Harvesting Training	18/01/2023		
		3	Spraying Training	05/04/2023		
		4	Spraying calibration	11/01/2023		
		5	PPE Training	12/04/2023		
		6	First Aid Training	08/06/2023		
		7	Fire Drill Training	06/07/2023		
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.	es form. The objective is to identify the appropriate training to be				
	an employees sused on their job description.		the training programme. Among the			



Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	the form is current job function, skill/knowledge required, present ability, job needed, training required, to name a few.	
implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the		Training programmes are established on annual basis based on training needs. Tt is subject for review from time to time if necessary. Refer Annual Training Programme (OSH Plan) for the year 2023 for both estate Labis Bahru and Palong Estate.	Complied
	- Minor compliance -		
4.5 Prin	ciple 5: Environment, natural resources, biodiversity a	nd 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 -	There is an Environmental Management Policy for the estates issued and endorsed in 01/10/2021 by the Managing Director. Therein the policy among others has stated that the Company is committed to protecting the environment and conserving biodiversity through sustainable development. This is policy is prominently displayed in the office along with other Company's Policies.	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 Environmental Management Policy is available with the objectives stated therein. The Environmental Improvement Plan dated 15/09/2023 has been summarized with the aspects and impacts evaluation covers the following areas/activities; a) Chemical storage/ issuance b) Gen-set / Power generation c) Fertilizer application d) Diesel storage / spillage e) Dust and smoke emission	OFI



Criterio	Criterion / Indicator				Compliance			
		f) EFB disposal in the fields						
		- /		te storage /disposal				
		h)	Chemical mixing	g /transportation				
				The Plan has also included the reduction of Pollution and Emission Management initiative and monitoring. There were traces of spillages in the fertilizer store during a site visit on 17/10/2023. The estate to enhance effort in managing such occurrences with prevention measures to avoid any environmental issues. Thus, OFI was raised.				
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. The mitigation measures to manage the significant impact were defined in the following documents: a) Pollution & Emission Plan reviewed 15/09/2023				t environmental	Complied		
	ay 1 states at 25/05/2025							
	- Major compliance -			ution Management Plan 20	023			
		c)	Environmental	Risk Assessment				
		Det	ails as provided	therein among others as	given be	low:		
			Emission	Source	F	requency		
		1	Dark smoke	Running vehicles	Daily			
		2	Noise	Diesel engine		onal hours		
				Running vehicles	Daily			
		3	Air pollution	Diesel engine		onal hours		
		1	Masta water	Running vehicles	•	onal hours		
		4	Waste water	PCD Septic tank spillage		led inspection inspection		
				Schuc rank shiilade	VVCCNIY	Пэресион		
			Emission	Action Dis-		PIC		
			Emission Dark smoke	Action Plan Inspection of vehicle con	ndition	Exec/staff		
		2		Scheduled maintenance		Exec/staff		



Criterio	on / Indicator			Assessment Find	lings		Compliance
		Receiving	cords of periodi	functional Adherence to SW guid Weekly line site inspection on the call reporting of each that the plans have be	condition CD for delines ction spillage of the ab	Exec/staff Exec/staff/ Exec/staff/ foreman	
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Im		as elaborated in for both short and long ssues.			Complied
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives. - Major compliance -	on Incoth a) b) c) d) The	a yearly basis of luded in this propers. Environmental Scheduled was Environmental HCV & Biodive		managemented to env	ent requirement. ironment among	Complied



Criterio	on / Indicator		Assessment Findings Compliance
		-	1 Manuring guidelines at buffer zone 10/3/2023 26/09/2023 2 Spraying guidelines at buffer zone 07/2/2023 25/06/2023 3 SW Management/Storage 27/2/2023 13/06/2023 4 ERP - Fire Drill/Flood/Spillages 20/7/2023 08/08/2023 5 Pollution Control Device Guidelines 21/1/2023 22/02/2023
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -		ne following forums are used by the estates in discussing concerns a environmental quality. Quarterly OSH meetings under agenda environmental Annual management review meeting. Discussion emphasized more on issues on water management plan, electricity use, diesel consumption, waste management, SIA plan, renewable energy, aspect/impact. Environmental Performance Monitoring Committee meeting Agenda among others as follows; i. Environmental Conservation Monitoring ii. Zero Burning Compliance iii. HCV/buffer zone compliance iv. Regulatory Requirement Compliance Status v. EIA / EIE status vi. Training /Internal Audit Report
			Estate



Criterio	on / Indicator		Compliance					
		Minute issues.	-	ed and adequ	ate ir	discussii	ng the environmental	
Criterio	n 4.5.2: Efficiency of energy use and use of renewable energy	,						
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period. - Major compliance -	for the over the is mean data is with a shown wastage a) To de b) Ti avec) Rod) Eco	estate's oper ne mt FFB pro isured by this s compiled for im of gradua in the ener ge among oth o ensure min esired FFA at mely servicin void leakages. egular servicin ducate employ	rations are recoduced (ratio) a ratio to indice comparison al reduction of gy managemers as follows imum balance the mill. If you wanted the good of gen-sets yees on fuel/eather the analysis wanted to be set on fuel/eather analysis wanted to indice the analysis wanted to indice the set of the se	durin cate i and co of die ent p ; e FFB to er	d. The quage the months level control for sel. There blan to remain the ramp bases are efficitly saving	practices.	Complied



Criterion / Indicator			Assessme	nt F	indings		Compliance
		Baseline 0.75			Т		
			T	1			
		Month	Kwh		Month	Kwh	
	1	Jan	55910	7	July	60659	
	2	Feb	57829	8	Aug	54958	
	3	Mac	53195	9	Sept	53186	
	4	April	50841	10	Oct	54169	
	5	May	56199	11	Nov	55852	
	6	Jun	53147	12	Dec	56307	
						Total 672252	
		Labis Bahru			1		
		Month	Diesel/FFB		Month	Diesel/FFB	
	1	Jan	0.60	7	July	0.48	
	2	Feb	0.68	8	Aug	0.36	
	3	Mac	0.73	9	Sept	0.34	
	4	April	0.51	10	Oct	0.36	
	5	May	0.52	11	Nov	0.36	
	6	Jun	0.44	12	Dec	0.30	
		B/line	0.59		Total	22981 L	
			1		, ,		
		Month	Kwh		Month	Kwh	
	1	Jan	23329	7	July	25466	
	2	Feb	26008	8	Aug	19731	
	3	Mac	24362	9	Sept	22416	
	4	April	24415	10	Oct	21914	
	5	May	21752	11	Nov	21772	
	6	Jun	22446	12	Dec	22165	

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Criterio	on / Indicator		As	ssessment Findings	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 -	non- use o contr recor mt F	monthly record on renewable sources of renewable energy rol for future imported from the meters. Graph is tabulual diesel and elected.	Complied	
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	proceestat	fibre and shell are ess system. Surplutes for multi purposestates for mulching	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 -	the \		sources and pollution has been identified in Plan 2023. It was reviewed on 04/02/2023 is	Complied
			Type of waste	Description	
		1	Domestic waste	Rubbish at estate complex	
		_		Fertilizer bags	
		2	Industrial waste	Scrap metal	
		3	Sewage waste	Disposed construction material Sewage	
		4	Scheduled	SW 404 Clinical waste	
		'	Waste	SW rags, plastics, filters	
			Waste	Spent lubricant & hydraulic oil	



Criterio	on / Indicator			Compliance		
				conta SW,	aminated with chemicals, pesticides,	
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:	esta			agement plan is described below; Both ru Estates both reviewed the plan on	Complied
	a) Identifying and monitoring sources of waste and pollution		Туре	Description	Action to be taken	
	o) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products	1	Domestic waste	Rubbish	Collection/disposal min 2x /week externally Establish collection SOP Establish collection schedule & PIC	
	- Major compliance -		Create awareness on hygiene Monitoring of line site			
		2	Industrial waste	Fertilizer bags	Inventory of bags, reuse for LF collection, sell to appointed contractor	
				Scrap metal	Inventory maintained, tender at zone level for sale to licensed contractor.	
				POME	Daily monitoring of application at designated fields a rate of 40mt/ha for mature areas.	
		3	Sewage waste	Sewage	To monitor during housing inspection and residents' complaints	
					Engagement with licensed contractor for sewage management.	
		4	Scheduled Waste	Clinical waste	Inventory maintained. Storage in sharp bin in clinic. Disposal to Kualiti Alam Waste Management	

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Criterio	n / Indicator		Compliance				
					SW rags, plastics, filters Spent lubricant & hydraulic oil	(licensed contractor) Inventory maintained. Storage in scheduled waste store. Disposal to Kualiti Alam registered with DOE Collection by licensed vendor. Inventory maintained. Disposal to Kualiti Alam registered with DOE	,
					Disposed containers, bags, equipment contaminat ed with chemicals, pesticides, SW,	Inventory maintained. Storage in SW store. All containers are labeled. Empty containers collected by authorized vendor. Kualiti Alam registered with DOE	
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 -	impoper level a) b) c) d) Am	plen erat els L L L L	mented. The tions are an of the doculevel 1 Interested 2 star are evel 3 worsevel 4 reco	e standard op vailable which umentation ide grated Manag ndard operating k instruction ords.	Vaste disposal is established and eration procedure for the estates / mill is prepared on Group basis. There are entified as follows; ement Manual g procedure/SPO OHS	Complied



Criterion / Indicator	Assessment Findings	Compliance
	Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The CU scheduled waste is disposed to the following vendors registered with DOE.	
	Palong Estate - Main Division Date SW409 SW307 SW109 SW305 SW110 SW306 SW410 31/7/23 0.091 0.180 0.038 0.375 0.025 0.105 0.170 06/3/23 0.214 0.060 0.107 0.102 0.041 0.210 0.058	
	Palong Estate - Kemedak Division Date SW409 SW307 SW109 SW305 SW110 SW408 SW410 27/7/23 0.129 0.189 0.003 0.129 0.002 0.080 0.009 01/2/23 0.030 0.209 0.004 0.208 0.005 0.021 0.128	
	Date SW 404 - Date SW404 11/5/23 Palong Main 0.006 - 08/12/22 0.002 11/5/23 Kemedak Div 0.002 - 08/12/22 0.002	
	Labis Bahru Estate Date SW409 SW408 SW109 SW305 SW110 SW307 SW410 13/8/23 0.625 - 0.110 0.983 0.006 - - 06/3/23 0.496 0.273 0.052 0.858 - 0.074 0.027 16/5/23 - SW404 0.0015 - - - -	
	The estates scheduled waste is disposed to the following vendors registered with DOE. Date SW Buyers/Vendor	



Criterio	on / Indicator		Assessment Findings							
		Palong Estate Labis Bahru Estate	30/04/20 30/04/20		ti Alam Sdn Bhd ti Alam Sdn Bhd					
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.	on the empty chemic containers in both es through approved lic Sxxxx Tekxxxxxx Er respectively Record or	al's containe states and m censed contr nterprise for	rs managemer ill were triple actor G-Plxxx Labis Bahru	griculture Department nt. All empty chemical rinsed, and disposed exx Sdn Bhd and SX and Palong Estate	Complied				
	- Major compliance -	Date 1 20 L pesticides of 2 4 L pesticides of 3 Storm – Rat Bair 4 Empty fertilizer Spraying Contain	ontainers t Boxes bags	L Bahru 20/9/2023 75 pcs 6 pcs 71 pcs -	Palong 20/7/2023 13 pcs 18 kg 743 pcs 1268 kg 27 kg					
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. - Minor compliance -	collection and dispose manages the same Collection 2 to 3 times Estate Palong Palong Kemedak Labis Bahru All the landfill sites w	al at the res landfill for s a week. Landfill sit P12 - B1 P11 - B3 P 08 - B1 rere visited a	te Collection Collection Collection Collection Collection Collection Collection Collection	made through the lastes. Palong Estate Cocoa Palm Oil Mill. Remarks 1 2/3 x week 1 2/3 x week 1 2/3 x week 1 compliance. Records in logbook. Both were	Complied				



Criterio	on / Indicator		Compliance	
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. - Major compliance -	Environmental Asp evaluated for the ii in the manageme Environmental Imp Areas of focus inc	civities are identified and documented in the ect & Impact Identification. From the EIA, it will be impact. The identified impact if any will be included ent plan. The evaluation is documented in the fact Evaluation. It was last reviewed on July 2023. Itude activities at the chemical store / workshop / waste / diesel tank / boiler house / effluent pond /	Complied
		monitored. This in emissions and effective environmental as activities. Environ (SM/5.2/EAI) and activities / operativities / operativities / operativities ources of pollutivities ources of pollutivities / operativities /	all polluting activities has been conducted and cluded the gaseous emissions, particulate / soot fluent. The CU has continued to maintain its pects/impacts register associated with their mental aspect and impact (EAI) records i.e. (SM/5.2/EIE) which covers estates and mill ration. 'Pollution Identification Environmental on Plan' is used to identify the waste products and on, was in place and is reviewed accordingly. significant environmental receptors for the estates is were:	
		Environmental Receptors	Source	
		1 Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).	
		2 Water	Water discharges – Cleaning water/run- off/process station waters (hydro	

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Criterio	n / Indicator			Assess	ment Finding	S		Compliance		
				down	boiler quenchi	ing water				
		3	Land	industrial	cheduled waste, / process wast from clinics.					
		to and	lution prevention identify the ward is being revies been taken by							
		a)	Scheduled wa	astes – were	disposed throug	h Kualiti A	lam Sdn Bhd			
		b)								
		c)	Full complian	ce to zero bu	ırning practices.					
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented.		e GHG emissio the palm GHG v		e operations is i	dentified a	and recorded	Complied		
	- Major compliance -	fer	The emission reduction plan for the estates includes reduction of fertilizer usage by embarking organic fertilizer and installation of biogas plan.							
			Issues & S	Strategies	Ac	tion Plan				
			l Reduce	diesel		_				
			consumption	at estates	To ensure		scheduled			
			operations		maintenance usage	optimum	gen set			
			2 Reduce smo	ke emission		V for all ve	ehicles			
			to the air							
		1	Reduce elect	ricity usage	Monitor usage	vs baselin	e			



Criterio	Criterion / Indicator		Assessment Findings Compliance
			Install capacitor at identified large power consumption motor Install LED bulb for the lighting system
Criterio	n 4.5.5: Natural water resources		
4.5.5.1	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities. c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate. e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented. f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.	ettlaab b c d b.T. s s M ttl	Minor Non- stablished. with latest review both made on 01/08/2023 for both he estates. The plan emphasized on the following areas. Water source Renewability of water source Avoidance of surface and ground water contamination he management monitors the water quality through water ampling: Monitoring of upstream, and downstream of water streams within he estates. Sighted and verified the following analysis for the espective estates. Date P06 P00 P05 P04 Standard L Bahru P N P N P N P N P N 1 15/01/23 0.12 0.37 0.09 0.47 0.05 0.71 0.16 0.30 0.2 7.0 2 14/05/23 0.05 1.23 0.02 0.23 0.07 1.56 0.02 0.12 0.2 7.0 3 12/07/23 0.19 2.28 0.01 0.47 0.15 1.74 0.09 0.29 0.2 7.0 4 05/10/23 0.05 0.18 0.05 0.05 0.05 0.05 0.16 0.05 0.01 0.2 7.0 Date P13/4 P13/7 P12/3 P07/1 Standard Palong P N



Criterion / Indicator		A	Assessm	ent Find	dings			Compliance
- Major compliance -	Drinki Dat 1 25/05 2 Stand	7.20 ard 6-9 therein are	upling - Kem urbidity 0.64 I	nedak Divis Al ND < 0.2 0.2	sion Cl 1.4 5	Coliform ND <10 Nil	E coli	
	1 Wash	ntingency place ea/incident eter ortage/ olonged dry eson	To obtain To train, to conse To seek To obtain	Action s n water fr /educate	steps rom SA staff/v r. e from water	NJ workers SAJ supply	PIC Executives / Staff	
	ро	vere water Ilution/ ntamination	To obtain To train to conse To seek To ob	n water fr n/educate	rom SA staff/ r. e from eated	J /workers	Executives / Staff	
d.Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Kulim Malaysia Berhad dated 01/11/2018). The buffer zones established are as following: River width Buffer Zone River width Buffer Zone River width River Zone River width River Zone River width River Zone River Width River Zone River Zone								



Criterio	on / Indicator			Compliance							
		f. 1	1								
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance -	int	This is in compliance by the estates. This requirement is also audited internally by the Sustainability Department personnel. During the field visit no construction of such was observed.								
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 -	co av ov ob	During the site visit practices of water harvesting are noted mainly constructed on flat areas in both estates. Roadside pits were also available at every 3 palm rows, to divert in event of water overflowing and also to benefit the nearest palm at the pit end to obtain additional moisture. This is part of the common practices introduced within the Group Agriculture Procedures.								
Criterio	n 4.5.6: Status of rare, threatened, or endangered species an	d hi	gh l	biodiversity v	/alue						
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	Co	The latest assessment conducted was in January 2008 for Palong Cocoa Complex Supply Base Estates respectively. The assessment was conducted by <i>A.J.F.M Dekker</i> . The assessment was made in relation to the Rapid Biodiversity Assessment. The report had							·	

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Criterion / Indicator	Assessment Findings Compliance
and threatened ecosystems, that could be significant affected by the grower(s) activities. b) Conservation status (e.g. The International Union of 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(stactivities). - Major compliance -	operating units. The reports detail the findings of a rapid appraisal of the biodiversity in the estates and address the RSPO P&C/MSPO relevant to biodiversity conservation and HCV. Therein being provided details relating to the following; a) General biodiversity issues



Criterion / Indicator	Asses	sment Finding	gs		Compliance
	1 Labis Black should crested serp purple heron, red wattled lapv	ent eagle, kingfishers,	ks, long taile	ed macaque	
	The HCV identified in both th	ne estates as sum	marized as	follows;	
	Labis Bahru Estate	Location	На	Туре	
	1 Pond & Buffer Zone	P08/03	5.02	HCV 4	
	2 Swamp (Plantable)	P03/03	3.12	HCV 4	
	3 Pocket Forest	P07/03	5.88	HCV 4	
	4 Swamp Total	P08/02	0.51 14.53	HCV 4	
	TOLAI		14.53		
	Palong Estate - Main	Location	На	Туре	
	1 Pond	P12/2, P12/3	1.19	HCV 4	
	2 Drains	P12/P08/P07	2.72	HCV 4	
	3 Boundary Drain	P13/7, P13/8	0.94	HCV 4	
	5 Pocket Forest	P07/01, P08/2	0.83	HCV 2	
	Total		5.68		
	Palong Estate /Kemedak	Location	На	Туре	
	1 River Buffer Zone	P10K/1	1.23	HCV 4	
	2 Pond	P10K/11K	11.01	HCV 4	
	3 Buffer Zone	P12K/1 - 3	1.47	HCV 4	
	4 Sanctuary	P12K/96B	1.05	HCV 2	
	5 Swamp	P12K/06B	0.30	11012	
	Total	7	15.06		
	There is also no wildlife	neither reported	nor obse	rved by the	



Criterio	on / Indicator	Assessment Findings	Compliance
		employees.	
4.5.6.2	If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management 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 -	There is no RTE or high biodiversity value at Palong Cocoa CU complex. The management and monitoring plan for HCV/Biodiversity areas was established and reviewed annually. There were displays of signage made at site i.e. a) No fishing, no manuring, b) no spraying, no slashing, no swimming There were programs held by the estates to all employees in pertaining to the awareness of HCV areas and RTE species. Interview with the employees concluded that training and briefing were made during the ad-hoc session and morning muster. This is also emphasized during the training held by the SID programs. Employees are aware of the following reminders; a) An offence to capture, harm, kills any wildlife. b) Disciplinary measures shall be taken if found violating company rules. c) Riparian buffer zone to be free from any chemicals application/pollution	Complied
		d) Relevant signs NO HUNTING NO FELLING ALLOWED	
4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required. - Major compliance -	The Biodiversity Improvement Plan 2023 had identified the plan. Among others consists of the following. It was reviewed annually recent being Kan 2023 for both Labis Bahru Estate and Palong Estate. a) To continue educating the workers regarding RTE. Workers interviewed confirmed that they are aware of no hunting is permitted in and within the estate.	Complied



Criterio	n / Indicator		Assessment F	indings		Compliance
		c) d) e) f) Traii show 1 2	Regular educating the employees about the need to protect the RTE Appropriate disciplinary measures of Information pertaining RTE and displayed at the display boards. Buffer zone establishment to mappegs. Encroachment control in HCV area ning in relation to the RTE/HCV moves below: Subject Biodiversity & IPM management Fertilizer application /buffer zone area Water sampling	via morning species. will be taken if relevant Classian and in and monitoring the relevant for the relevant	found violated. J policies were stall buffer zone	
		5	HCV/Biodiversity - weeding RTE protection/ penalty	09/2/2023 10/3/2023	18/08/2023	
Criterion	4.5.7: Zero burning practices			, , ,		
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 -	Sust (sigr Ope com	re is no land preparation by bustainability handbook has described to the	therein on Env include the a 1. The manag	ironmental Policy adoption of Zero gement endorsed	Complied
4.5.7.2	A special approval from the relevant authorities shall be sought	Ther	re is no land preparation by means	of burning at	both the estates.	N/A



Criterio	on / Indicator	Assessment Findings	Compliance
	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.	This is confirmed through observation during the field visits and interview with the workers.	
	- Major compliance -		
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws.	There is no land preparation by means of burning at both the estates. This is confirmed through observation during the field visits and interview with the workers.	N/A
	- Major compliance -		
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	The management strictly enforces the practice of Zero open burning as outlined in the Sustainability Policy. The operating units consistently adhere to this policy for any replanting activities. Field visits and interviews with workers confirmed that no open burning is being practiced in the estates. Additionally, the audit conducted on the estate revealed no instances of open burning activities.	Complied
4.6 Prin	ciple 6: Best Practices		
Criterio	n 4.6.1: Site Management		
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	Kulim (Malaysia) Berhad has established Standard Operating Procedure as guidance for daily operation for the mills and estates. The estates hold 3 SOPs as follows:	Complied
		1. Agriculture Manual updated 2019 (for Plantations).	
		2. Sustainable Management System dated 2020.	
		3. Safety Work Procedure dated 2009.	
		The management has established a system to monitor the mill operation such as Internal Audit, Operational Checklist, Workplace	



Criterio	on / Indicator	Assessment Findings	Compliance
		Inspection, Management Review Meeting and Mill/Estates Inspection Visit. As part of the monitoring process, the estate conducted daily monitoring on the work process besides receiving visitors from the agronomist, plantation advisor and internal audit department.	
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 -	Kulim (M) Berhad has established Agriculture Manual under topic Replanting: Terrance & Platform Construction. The manual limits the construction on hilly area at 25 slope degree. Areas with greater than 25-degree slope are not to be planted but be left for biodiversity purposes.	Complied
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	Both Estates visited had a visual identification/reference system for each established field/block and maps established. Field numbers and hectare was marked on palms and in some areas on concrete slaps. Sample for Labis Bahru Estate Field No: P06 Block 1 Hectarage: 33.42ha SPH: 138 Year of Planting: 2006 Material Seedlings: Kulim DXP Sample for Palong Estate Field No: P06 K Hectarage: 33.42ha SPH: 13 Year of Planting: 2006	Complied



Criterion / Indicator		Assessment Findings	Compliance
		Material Seedlings: EPA DXP	
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 -	The business or management plan for the estates were presented in the form of annual budget with 5 years projection. The annual budget contains the crop projection and the finance allocation for field operation & administrations and CAPEX. The management has their monthly progress report known as Expenditure Comment and regular meetings to monitor the expenditure to ensure the budget is not overrun.	Complied
4.6.2.2	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years. - Major compliance -	The estates have their replanting programme which have the projection until five years. The hectarage to be replanted based on the programme is as follows: Estate 2024 2025 2026 2027 2028 Labis Bharu 249.06 122.79 Palong 62.76	Complied
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 -	Business plan is reflected through the establishment of annual budget. The projection of 5 years was available at all the sampled estates. Among the information available in the business plan is crop budget, cost of production per Ha and per mt basis, price forecast and estimation of ROI.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4.6.2.4	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. - Major compliance -	The estates performance is recorded in the monthly progress report. Details of the actual vs budget of crop production, fixed and direct cost are shown therein. The management also provides variance report on the performance and reviewed monthly. The supervisory personnel maintained a daily cost for the field operations. Meetings which involved the Managers and the Regional Controller/Head Office Management for the performance review were also regularly conducted.	Complied
Criterio	n 4.6.3: Transparent and fair price dealing		
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	Pricing mechanism for all contractors has been clearly stated in the contract agreement with the estates. Refer section 6.0 Terms of payments. Sample of contractors has been taken and details as per below: Labis Bahru Estate Sample 1 Contractor: NXXX BXXXXXXX EXXXXXXX Work: Harvesting FFB Validity: 01/01/2023 to 30/09/2024 Sample 2 Contractor: TXXX WXXX TXXXXXXX Work: FFB Transport to Mill Validity: 01/04/2023 to 30/06/2024 Palong Estate Sample 1	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		Contractor: PXXXXXXXXX JXXX CXXXXXXXX Work: Loading and Transporting of FFB Validity: 01/01/2023 to 30/06/2024 Sample 2 Contractor: JXXXXXXXX EXXXXXXXX Work: Harvesting of FFB and In Field Collection by using Mini Tractor Scissor Lift Validity: 01/02/2021 to 31/01/2024	
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	All contract agreement were sign by both parties and payment term and condition were conducted as the agreements. Refer sample payment to the contractor as below: Labis Bahru Estate Sample 1 Contractor: NXXX BXXXXXXXX EXXXXXXX Work: Harvesting FFB Validity: 01/01/2023 to 30/09/2024 Invoice date: 30/09/2023 Payment made: 08/10/2023 Reference: 003XX Sample 2 Contractor: TXXX WXXX TXXXXXX Work: FFB Transport to Mill Validity: 01/04/2023 to 30/06/2024 Invoice date: 30/09/2023	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		Payment made: 08/10/2023 Reference: 10XX Palong Estate Sample 1 Contractor: PXXXXXXXXX JXXX CXXXXXXXX Work: Loading and Transporting of FFB Validity: 01/01/2023 to 30/06/2024 Invoice date: 31/03/2023 Payment made: 06/04/2023 Sample 2 Contractor: JXXXXXXXXX EXXXXXXXX Work: Harvesting of FFB and In Field Collection by using Mini Tractor Scissor Lift Validity: 01/02/2021 to 31/01/2024 Invoice date: 30/03/2023 Payment made: 31/03/2023	
Criterio	1 4.6.4: Contractor		
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	Contractors were briefed on MSPO matters and the requirement to comply with MSPO matters was stipulated in the contract agreement. This insertion of this Policy is to ensure contractors are aware and comply with local, national laws such as payment of minimum wage, ratified international laws, and also with MSPO standards. This was also acknowledged by the contractors and reiterated during the stakeholder meeting.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	There is evidence that all sample contracts have been made fair, legal and transparent and has been agreed by both parties. Sample of contract agreement as below: Labis Bahru Estate Sample 1 Contractor: NXXX BXXXXXXXX EXXXXXXXX Work: Harvesting FFB Validity: 01/01/2023 to 30/09/2024 Reference: JPB/LLB/169/52/2023/01(NFH) Sample 2 Contractor: TXXX WXXX TXXXXXXX Work: FFB Transport to Mill Validity: 01/04/2023 to 30/06/2024 Reference: ROC/LBE10/2023-01 Palong Estate Sample 1 Contractor: PXXXXXXXXX JXXX CXXXXXXXX Work: Loading and Transporting of FFB Validity: 01/01/2023 to 30/06/2024 Reference: MPSB/KEMEDAK5/2017 Sample 2	Complied
		Contractor: JXXXXXXXXX EXXXXXXXX Work: Harvesting of FFB and In Field Collection by using Mini Tractor Scissor Lift	



Criterio	on / Indicator	Assessment Findings	Compliance
		Validity: 01/02/2021 to 31/01/2024 Reference: MPSB/PALONG3/218/2020	
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	As per Agreement, Letter of Acceptance Section 6.0, All contract operation perform by any appointed contractors and sub-contractors in the certified mill and estates is subjected to any certification audit 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 contractor, by checking and signing the assessment of the contractor for each task and season contracted. - Major compliance -	The control points on all tasks performed by the contractors were monitored. The Payment Card and Payment Record Form were updated on monthly's basis in order to ensure all claims by contractors and payment made to them were in line with the term and condition of the contract agreement. While for other types of works observance of work done by the contractor has been monitored by the Mandore that in charge for respective works. Any issues will be highlighted to management for further action.	Complied
4.7 Prin	ciple 7: Development of new planting		
Criterio	n 4.7.1: High biodiversity value		
4.7.1.1	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.1.2	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia's National Physical Plan (NPP) and the Sabah Forest Management Unit under the	Not Applicable, there are no new planting available.	N/A



Criterio	on / Indicator	Assessment Findings	Compliance
	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	n 4.7.2: Peat Land		
4.7.2.1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - Major compliance -	Not Applicable, there are no new planting available.	N/A
Criterion	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. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. - Major compliance -	Not Applicable, there are no new planting available.	N/A

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Criterio	on / Indicator	Assessment Findings	Compliance
4.7.3.4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. - Minor compliance -	Not Applicable, there are no new planting available.	N/A
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. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - Major compliance -	Not Applicable, there are no new planting available.	N/A
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. - Major compliance -	Not Applicable, there are no new planting available.	N/A
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.	Not Applicable, there are no new planting available.	N/A



Criterio	on / Indicator	Assessment Findings	Compliance
	- Major compliance -		
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	Not Applicable, there are no new planting available.	N/A
Criterio	n 4.7.6: Customary land		
4.7.6.1	No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	Not Applicable, there are no new planting available.	N/A
4.7.6.3	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. - Major compliance -	Not Applicable, there are no new planting available.	N/A
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.	Not Applicable, there are no new planting available.	N/A



Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented.	Not Applicable, there are no new planting available.	N/A
	- Major compliance -		
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.6.8	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development.	Not Applicable, there are no new planting available.	N/A
	- Minor compliance -		



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

Criterio	on / 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	Policy for the implementation of MSPO shall be established. - Major compliance -	Policy for the implementation of MSPO has been established. Refer https://johorplantations.com/wp-content/uploads/2023/09/MSPO-policy.pdf Mentioned in the policy that the management is committed to implement all the requirement set out by the Malaysian Sustainable Palm Oil (MSPO) and cover all the element required. Policy briefing has been conducted: Palong Cocoa POM: 06/08/2023	Complied	
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - Major compliance -	Mentioned also in the policy that the management of Johor Plantations Berhad is committed to achieve balance between people, planet and profit in all management decision and operation through continual program in line with the commitment to produce sustainable palm oil products.	Complied	
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 -	Internal audit procedure has been established in the document title "Internal audit" document number SQD/SMS/3.2 dated 01/08/2020 issuance number 01. Stated in the procedure that the internal audit was planned to be conducted at the frequency at least once within 12 months (before the expiry of the certificate). There is evidence that the internal audit has been conducted on	Complied	



Criterio	n / Indicator	Assessment Findings	Compliance
		annual basis. Notification for internal audit has been distributed to all operating units prior to the audit. Refer letter dated 31/05/2023 with reference number SID/SD/ADMIN/015/25: RSPO, MSPO, ISCC Internal Audit Schedule – Full Audit Certification by SID Dept 2023.	
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 has been established in the document title "Internal audit" document number SQD/SMS/3.2 dated 01/08/2020 issuance number 01. Internal audit has been conducted on 10/09/2023. The outcome of the audits has been compiled in the document title "Internal audit, non-conformance report". The audit results have been signed accepted by the mill manager. There is evidence of the internal audit checklist which listed has list down of document requirement and status of each indicator for each operating unit and has been verified by the auditor. For Palong Cocoa POM, no non-conformance raised.	Complied
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	There is evidence of the internal audit checklist which listed has list down of document requirement and status of each indicator for each operating unit and has been verified by the auditor. The outcome of the audits has been compiled in the document title "Internal audit, non-conformance report". The audit results have been signed accepted by the estate manager	Complied
Criterior	4.1.3 – Management Review		
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.	The management of Johor Plantations Berhad has established internal procedure for management review and has been document in the document number SQD/SMS/3.1 dated 01/08/2020 title "Management review". Mentioned in the procedure that management	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
GIRCHIO	- Major compliance -	review needs to be conducted at least once a year. Management review meeting was conducted on 25/09/2023. Issues that has been discussed during the management review were: 1. Charman remarks 2. Confirmation of last meeting 3. Issue raised on previous meeting 4. Internal Audit Report 5. RSPO and MSPO Performance 6. Changes in the system 7. Complaint and grievances 8. Complaint from stakeholder 9. Customer feedback 10. Continuous Improvement 11. Social Issue 12. Environment 13. Productivity	
		14. Other matters	
Criterior	1 4.1.4 - Continual Improvement		
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. - Major compliance -	This has been established in the Continuous Improvement Plan 2023 updated annually. This compilation was made with subject to the consideration of the main social and environmental impacts. These include to continue engagement with relevant stakeholders (workers, surrounding communities, government agencies, agencies, suppliers and contractors. The management documents related to	Complied



Criterion / Indicator	Assessment I	Findings	Compliance
	environmental plans and impact asses	sments are:	
	(a) Environmental Aspect Identification (EIE) registers.		
	(b) Environmental Improvement Plan	2023	
	(c) Pollution Prevention Plan 2023		
	(d) Water Management Plan. 2023		
	(e) Waste Management Plan 2023		
	The Continuous Management Plan 20 among others include the following;	023 for the mill operations also	
	Description	Management Plan	
	OSHA		
	1 Chra 2023	To hire competent person	
	2 Ergonomic Risk Assessment	To train on implementation	
	Social		
	1 Refurbishment 46 workers Q	To supply furniture	
	2 Mill quarter O/H tank	Replace 1 unit tank	
	3 Installation of ATM machine	Facilities for employees	
	1 Environmental		
	2 Replace last discharge pump	Provision in CAPEX 2023	
	3 Repairing ESP	Major repair as per CAPEX	
	Productivity / Operations	T	
	1 Replacement of unit nut silo	Provision in CAPEX 2023	
	2 Replacement 1 sterilizer chamber	Provision in CAPEX 2023	
	3 Replacement 1 auto feeder	Provision in CAPEX 2023	
	4 Replacement shell hopper housing	Provision in CAPEX 2023	
	5 Replacement fiber cyclone	Provision in CAPEX 2023	



Criterio	on / Indicator	Assessment Findings	Compliance
		6 Replacement EFB Conveyor no 2 Provision in CAPEX 2023 7 Replacement 1 thresher drum no 1 Provision in CAPEX 2023	
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. - Major compliance -	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 RC and Head Office transacted during the monthly Managers meetings and emails.	Complied
4.2 Prin	ciple 2: Transparency		
Criterio	n 4.2.1 – Transparency of information and documents relevant	to MSPO requirements	
4.2.1.1	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms. - Major compliance -	Procedure for Transparency has been established. Refer Transparency Procedure with reference number SQD/SMS/1.0 dated 01/08/2020. The management has conducted the stakeholder meeting for external stakeholder. The meeting was invited such as contractor, supplier, primary school, smallholder and NGO for communicate and discussion any issue related on the MSPO and RSPO. There is positive feedback from the stakeholder meeting. A combine stakeholder meeting for Palong Complex (Northern Region) was conducted on 09/10/2023 through physical meet at VIP Hotel, Segamat. The stakeholders that involved such as government authorities, contractors, suppliers, neighboring plantations, and local communities. Sighted minutes of meeting, attendance and photos.	Complied
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	Refer Transparency Procedure with reference number SQD/SMS/1.0 dated 01/08/2020. Stated in the Section 4.0 This procedure will be in place to ensure that all relevant documents are available and kept up	Complied



Criterion / Indicator	Assessment Findings	Compliance
outcomes Major compliance -	to date with regards to transparency. This will further identify all relevant information to be made available to demonstrate transparency. This documentation will be available in appropriate languages i.e. English and Bahasa Malaysia The operating units and respective department will ensure that the following documents are available if requested and they do not impinge on confidentiality and will not cause detrimental Sustainability or social outcomes.	
	The management has display documents for public information and notification. There were sighted the some of document display at notice board for public information. Any stakeholder also can get information by reviewing the public documents.	
	It was sighted the following evidence displayed on the notice board: an OSH Management Plan, an Environment Management Plan, a Social Management Plan, a Company Policy, a Complaint Form, and a Complaint Procedure.	
	Listed all the document/information that can be requested by the interested parties but not limited to such as:	
	a. Land title/ user rights	
	b. Occupational safety and health plan	
	c. HCV documentation	
	d. Detail of complaint or grievances.	
	e. Details of complaints or grievances	
	f. Continuous improvement plan	
	g. HCS documentation	
Criterion 4.2.2 – Transparent method of communication and consultation	on	



Criterio	on / Indicator	Assessment Findings	Compliance
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	Procedure for consultation and communication has been established. Refer Consultation and Communication Procedure with Doc. No.: SQD/SMS/1.1 dated 01/08/2020 to ensure management has an open and transparent communication methods with local communities and other internal & external stakeholders. Modes of the communication are such as muster, meetings, campaigns, suggestion boxes, letter, email, social media, face to face communication and etc.	Complied
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . - Minor compliance -	Assistant Manager for Palong Cocoa POM has been appointed as Social Person In-charge and appointment letter dated January 2023 was sighted.	Complied
4.2.2.3	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. - Major compliance -	List of stakeholders has been established. Updated on list has been made on October 2023. Listing has included Government Department, Buyers Company, Association, Union, Corporation, Contractors, Suppliers, Service company, Utilities company, Shopkeepers, Hospital / Clinic, Bank Institution, Courier services, school, Inter estate, other community. A combine stakeholder meeting for Palong Complex (Northern Region) was conducted on 09/10/2023 through physical meet at VIP Hotel, Segamat. The stakeholders that involved such as government authorities, contractors, suppliers, neighbouring plantations, and local communities. Sighted minutes of meeting, attendance and photos. There is no issue raised during the stakeholder meeting session.	Complied
Criterio	n 4.2.3 – Traceability		
4.2.3.1	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability.	An SOP has been established with ref no SQD/SMS/1.2, dated 01/08/2020, issue 1, rev.05. Therein describing information of Person in charge is the respective Mill Manager in office at time of	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	- Major compliance -	tenure. All appointment is issued via letter dated 08/09/2023 by the Head Of Sustainability and Innovation Division. FFB flow chart from estate harvesting designated block to mill weighbridge (tickets). The mill processing records the total FFB processed for the day and the storage tank no being stored. The records include opening FFB balances in ramp and cages plus the FFB intake from the estates for the day less the closing FFB balances will provide the total processed. The despatch oil from the storage tank follows a similar formula opening stock plus production less the despatch volume will give a closing stock for the day record. All records of CPO tank sounding are recorded during the 2 shifts operations.	
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	The mill maintained daily production records as described in 4.2.3.1 above in compliance to the procedure established by the mill. FFB flow chart from estate harvesting designated block to mill weighbridge (tickets). The mill processing records the total FFB processed for the day and the storage tank no being stored. The records include opening FFB balances in ramp and cages plus the FFB intake from the estates for the day less the closing FFB balances will provide the total processed. The despatch oil from the storage tank follows a similar formula opening stock plus production less the despatch volume will give a closing stock for the day record. All records of CPO tank sounding are recorded during the 2 shifts operations. All records are maintained in the daily production report authorised by the Mill Manager.	Complied
4.2.3.3	The management shall identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	The Mill Manager was appointed via letter dated 08/09/2023 issued by the Head of Sustainability and Innovation Division as the PIC for traceability. The appointment letter was sighted and verified.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance - ciple 3: Compliance to legal requirements n 4.3.1 — Regulatory requirements	The FFB weighbridge ticket/despatch note is produced for all transaction to Palong Cocoa Mill. The set of document consists of the following information. Other dispatches of mill produce possess similar information. a) Weighbridge ticket - Date / D/O no / Quantity / w/bridge operator name - RSPO Certificate no - Serial no / FFA / ST no / Temperature. - MPOB Licence - Loading Note - Date / Lab results / ST no Bunker no / Transporter / Buyer / Contract No /Drivers name. Date Ticket no Type Qty/mt Vehicle No Buyer 1 18/10/23 C11156 CPO 41.520 BGH6927 ICT Specialty Fat 2 18/10/23 C11155 CPO 45.770 JTA9678 PGEO Edible Oil 3 18/10/23 C11154 CPO 44.210 JUN8698 ICT Specialty Fat 4 18/10/23 C11153 CPO 35.490 JSK2993 PGEO Edible Oil 1 17/10/23 K02885 CPK 40.770 MBR9599 Palmaju Edible 2 13/10/23 K02883 CPK 41.660 JNB1899 Palmaju Edible 3 16/10/23 K02884 CPK 43.570 BEW243 Palmaju Edible 4 12/10/23 K02882 CPK 43.420 JRF3222 PGEO Oil Mill	Complied
4.3.1.1	All operations shall be in compliance with applicable local, state,	Palong Cocoa POM has documented all Licence, permit and	Complied



Criterion / Indicator	Assessment Findings	Compliance
national and ratified international laws and regulations. - Major compliance -	applicable Law and Regulations to ensure compliance towards all applicable local, national and ratified international laws and regulations. The compliances is guided by the document Sustainable Management System; Compliance To Legal Requirement; Document Number: SQD/SMS/2.0; Document Date: 01/08/2020; Issue: 01.	
	Among permit and license sampled were: 1. MPOB License #578392004000 valid from 29/09/2023 until 30/11/2023	
	 DOE License #004720 valid from 01/07/2023 until 30/06/2024 Diesel Permit #JH(SGT)0143/08 PSK valid from 18/08/2021 until 17/08/2024 	
	4. Abstraction License #BAKAJ/334/300/5/6/8/9 valid until 31/12/2023	
	 5. Fire Certificate #340080 valid from 08/06/2023 until 07/06/2024 6. Weighbridge inspection #2.1KQ036911 by De Metrology inspected on 01/08/2023 	
	 Back Pressure Receiver #PMT60888 valid until 29/08/2024 Air Compressor No. 2 #JH PMT19028 valid until 29/08/2024 	
	9. Air Receiver #JH PMT 81139 valid until 31/10/202410. Competence person Steam Cert Grade 2 to Manager #020/2014 dated 24/02/2014	
	11. Competence person AGT #MOCA/AGTES/23-08/019/00 dated 30/08/2023	
	12. Competence person CePSWaM #CePSWam/00066 to Assistant Manager dated 05/09/2017	
	13. Competence person CePPOME #CePPOME/01886 dated	



Criterio	on / Indicator	Assessment Findings	Compliance
		31/05/2018	
4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirements register. - Major compliance -	Certification unit continued to implement and maintain their established documented system for identifying, accessing, tracking updates and monitoring of compliance with the legal requirements that are applicable to the CU's operation.	Complied
		Each office of the operating unit (mill) has its own legal requirements register (LRR) and were being evaluated individually from time to time for compliance mainly through internal audit. Among the applicable legal laws registered are EQA, OSHA, Factory & Machinery Act, Employment Act, and Workers' Minimum Standard of Housing and Amenities Act.	
		Latest updated has been done on 31/08/2023 with updating Of Minimum wages Order 2022, Employees Provident Fund (Amendment No. 2) Rules 2022, Employees Provident Fund (Amendment Of Eight Schedule) Order 2022 and Prevention And Control Of Infectious Disease (Measures Within Infected Local Areas) (National Recovery Plan) (Transition Phase To Endemic) 2022.	
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 -	Monitoring on the compliance towards the requirement register has been done by Executive Regional Controller. Refer Kulim Group Compliance Framework dated 30/09/2023. Among the medium used in updating the legal register were websites, subscription to legal information provider and mass media.	Complied
4.3.1.4	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements. - Minor compliance -	The Executive Regional Controller of Northern Region has been appointed as the person in-charged, (ref.: appointment letter (25) RMC/COM/GM/2022/25, dated 21/07/2022) to be the person responsible to monitor compliance and to track and update the changes in regulatory requirements. The letter was from the Head of	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		Governance Division of KMB.	
Criterio	n 4.3.2 – Lands use rights		
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. - Major compliance -	Management has ensured that their milling activities do not diminish the land user rights of other users. It was confirmed during site visit and interview with relevant stakeholder during the audit. The legitimacy of ownership of the estate belong to Kulim (M) Bhd group.	Complied
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. - Major compliance -	Management has provided the document showing legal ownership of their land. Refer detail below: District: Segamat No. H.S.D: 11071 No. P.T.D: 1354	Complied
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	Layout plan available indicated the whole mill area within Mungka Estate compound. Boundary map with other land-owners available at the estate. Sighted the mill was surrounded by fences.	Complied
4.3.2.4	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC).	There is no land dispute at Palong Cocoa POM at the time of audit. The land belongs to Kulim (M) Berhad and land ownership documents verified.	Complied
	- Minor compliance -		
Criterion 4.3.3 — Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not	There is no customary land or negotiated agreements within the Palong Cocoa POM Land area confirmed through document reviewed	N/A



Criterio	n / Indicator	Assessment Findings	Compliance
	being threatened or reduced Major compliance -	and interviewed with the communities.	
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	There is no customary land or negotiated agreements within the Palong Cocoa POM Land area confirmed through document reviewed and interviewed with the communities.	N/A
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	There is no customary land or negotiated agreements within the Palong Cocoa POM Land area confirmed through document reviewed and interviewed with the communities.	N/A
4.4 Princ	ciple 4: Social responsibility, health, safety and employn	nent condition	
Criterior	1 4.4.1: Social Impact Assessment (SIA)		
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	Sustainability & Quality Department has carried out Social Impact Assessment on 13/10/2022 as per the Standard Operating Procedure title Social Impact Assessment (Doc No; SQD/SMS/3.6, Date: 01/08/2020). The checklist has been sent to the estates management and filled in by the workers and the contractors. The social impact registeris developed based on the scoring of frequency, consequence and likelihood.	Complied
		Social Management Plan will be developed after the social impact register established. The last review of the social management plan was on 13/10/2022 with identification of negative and positive impacts. Mitigation and promotion actions were taken accordingly to the impacts identified.	
Criterior	1 4.4.2: Complaints and grievances		



Criterio	on / Indicator	Assessment Findings	Compliance
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	The system to dealing with complaint and grievances has been established. Refer Grievance Procedure with Doc. No.: SQD/SMS/4.1 dated 01/08/2020 to ensure management has a documented system for dealing with complaints and grievances that is agreeable to all sides and accepted by all stakeholders. Besides, management has developed Grievance Policy dated 07/12/2021 to ensure that there is a transparent process for ensuring stakeholder's grievances and complaints are dealt with fairly,consistently and promptly. Briefing of the grievance policy and procedure was conducted during stakeholder meeting.	Complied
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - Major compliance -	The system to dealing with complaint and grievances has been established. Refer Grievance Procedure with Doc. No.: SQD/SMS/4.1 dated 01/08/2020 to ensure management has a documented system for dealing with complaints and grievances. Labis Bahru Estate and Palong Estate has implemented Suggestion/ Complaint form & Enquiry Register Book to record any grievances from external stakeholders and Complaint Book for workers. Sample of complaint record as below:	Complied
		Palong Cocoa POM Sample 1	
		Complainant: XXXXX Date: 06/06/2023, House No 58, Issue: Toilet Problem, Issue has been solved on 08/10/2023	
		Sample 2	
		Complainant: XXXXX Date: 24/05/2023, House No 41, Issue: Naco Window Replacement, Issue has been solved on 08/06/2023	



Criterio	on / Indicator	Assessment Findings	Compliance
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - Minor compliance -	Complaint/ Suggestion Box was available in front of the office and in front of the security post in Palong Cocoa POM. Thestakeholders and workers are aware of the complaint box as a method b lodge complaint.	Complied
4.4.2.4	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. - Minor compliance -	Complaint/ Suggestion Box was available in front of the office and in front of the security post in Palong Cocoa POM. Thestakeholders and workers are aware of the complaint box as a method b lodge complaint.	Complied
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. - Major compliance -	Refer record "Laporan Kerosakan Perumahan" and Enquiry Register Record. Complaint/ Enquiry Register records since 2018 were maintained.	Complied
Criterio	n 4.4.3: Commitment to contribute to local sustainable developr	nent	
4.4.3.1	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation. - Minor compliance -	Palong Cocoa POM has made contribution to the local communities: Refer Donation to PIBG SK Kemedak for Maulidur Rasul Events dated 03/10/2023.	Complied
Criterio	n 4.4.4: Employees safety and health		
4.4.4.1	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.	Occupational Safety and Health Policy dated 01/10/2021 has been established which in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139). It was signed by the Managing Director of KMB. Among the method of	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
	- Major compliance -	communication is through morning muster briefing, training, and display on notice boards. The new policy has just been emailed to every estate and mill on 14/10/2023 but not yet finalized by the company. Among the method of communication are through morning muster briefing, training, and display on notice. For Palong Cocoa Palm Oil Mill the briefing on the OSH Policy has been done on 18/09/2023 during muster at muster ground attend by 102 participants. The policy was signed by the Managing Director of Kulim (Malaysia) Berhad and can also be found at http://www.kulim.com.my/ourpolicy.aspx?p_Id=0&c_Id=2097	
4.4.4.2	The occupational safety and health plan should cover the following: a) A safety and health policy, which is communicated and implemented. b) The risk of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: i. All employees involved are adequately trained on safe working practices; ii. All precautions attached to products should be properly observed and applied; d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as 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	 a) Occupational Safety and Health Policy dated 01/10/2021 has been established which in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139). It was signed by the Managing Director of KMB. For Palong Cocoa Palm Oil Mill the briefing on the OSH Policy has been done on 18/09/2023 during muster at muster ground attend by 102 participants. b) HIRARC was available in the mill to identify assess and provide controls for all the risks associated to the operations in the mill. Sighted the HIRARC for process and Maintenance has been reviewed on 16/07/2022. During site visit to Palong Cocoa Palm Oil Mill, verified the HIRARC for working at height, CPO dispatch and CPO filling has been updated on 30/11/2023. The HIRARC was review lead by the Assistant Mill Engineer, assist by 5 accessors from mill staffs, Engine Driver Mill Supervisor 1 Mill Supervisor 2 	Complied



Criterion / Indicator	Assessment Findings	Compliance
for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements. g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded. h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees. i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite. j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals. - Major compliance -	 Grading Supervisor The new HIRARC was include "Safety Harness" as a part of the PPE during the work activity. The HIRARC also been review on 27/03/2023 and approved and signed by the Mill Manager. From the observation during site audit on the current progress of work for CPO filling for tanker number BGS 6927, verified the sample boy/lab operator are suit up with proper. Safety Helmet Safety shoes Safety Harness 	

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Criterion / Indicator	Assessment Findings	Compliance
	indicates that all workers get satisfactory conditions. 5 workers have been exposed n-hexane, from the biological monitoring test the result showing normal parameter. The Medical Surveillance 2023 has done by JPG Terrasolutions Sdn Bhd by engaging OHD Dr no: HQ/11/DOC/00/235 from U.n.i Klinik Permas Jaya.	
	Noise Risk Assessment has been conducted at Palong Cocoa POM on 05/05/2020 by Noise Risk Assessor: (JKKP Registration No.: JKKPHIE127/5/3-1(No.169). The NRA Report (JKKPHIE127/5/3-1(No.169)-2020/003) was available for verification. From the assessment, the conclusion come with employees that exposed to excessive noise has been identified and noise source has been obtained. The objectives set out this noise monitoring exercise were accomplished.	
	Audiometric Test was conducted for workers exposed to excessive noise in the mill based on the NRA recommendations. The audiometric testing report date on 20/07/2023 by doctor with dosh no: HQ/15/DOC/00/395, report no: PAC/AMT/230710 by JPG Terrasolutions Sdn Bhd in collaboration with PAC testing & Consulting Sdn Bhd has done the audiometric test at Palong Cocoa Palm Oil Mill. The test is prepared by PAC Testing & Consulting Sd Bhd with ATC Registration no: JKKP/2022/11-04/00043. List of employees tested =15 workers. List of workers with Baseline Audiogram Readings: 1 worker, List of annual Audiogram reading= 14 workers, List of employees who have "Standard Threshold Shift" = 2 workers, List of who has hearing impairment =2 workers, List with NIHL=7 workers	
	The retest has been conducted on 12/10/2023 by BP Healthcare Group with ATC Registration no: JH/20/22/162954 and Report dated 12/10/2023. A total of 2 personal who has hearing	



Criterion / Indicator	Assessment Findings	Compliance
	impairment were retested and the results showed that the 2 workers:	
	Worker 1 - Right: Mild to moderate high frequency SNHL	
	Left: Mild High frequency SNHL	
	Worker 2 - Right: Mild to moderate high frequency SNHL	
	- High frequency SNHL	
	For both of them the results showing they need continue annual audiometry and provision of PHP.	
	c) Training record was review and sighted Chemical Handling. Training was conducted on	
	 PPE Training dated 23/08/2023 attend by 17 participants. 	
	 First Aid Box 25 Item Training dated 13/10/2023 attend by 17 participants. 	
	 LOTO & Permit to work training dated 09/06/2023 attend by 25 participants. 	
	 Working at Height & Confined Space dated 05/07/2023 attend by 18 participants. 	
	 ERP & CPR Training dated 19/08/2023 	
	 Safety Workshop at Workshop dated 02/09/2023 	
	d) Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators based on the PPE issuance forms. Verified the PPE issuance to Boiler Man a N95 respirator on 05/10/2023.	
	Mill has done the PPE training to all workshop workers, electrical workers and the supervisor on 23/08/2023. The training was	



Criterion / Indicator	Assessment Findings	Compliance
	attended by 17 participants. The contain on the training are include on PPE knowledge, PPE awareness, PPE in good conditions, Good Mill Practice on PPE wearing and also Mill Good Practices.	
	e) Management established the work instruction for chemical	
	handling as below:	
	Chemical Control (SDM/WI/17)	
	Handling of Schedule Waste (SDM/WI/5)	
	Handling of Chemical (SDM/WI/9)	
	Pesticides were found stored in the mill and all estate's Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the storekeeper was seen to unlock the padlock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety Data Sheet were available. The Chemical Registers for the mill was available for verification and reviewed yearly and as and when there are introductions of new chemicals in the operations. The register showed that only class III & IV pesticides were used at the mill.	
	f) The Manager and Assistant Engineer of the respective Operating Units are appointed as the Chairman for Safety and Health Committee at the estate as stated in the appointment letter dated 15/09/2021 undersigned by the Chairman, ESG Committee	



Criterion / Indicator			Assessment Fi	ndings	Compliance
	g)		neetings were cond nill to address all the	ducted at an interval of 3 e OSH related issues. Sighted	
		OSH Meeting 1 st Meeting	Palong Cocoa PO 12/03/2023	M Participants 10 participants from employee 11 participants from employee.	
		2 nd Meeting	16/05/2023	11 participants from employee 11 participants from employee.	
		3 rd Meeting	26/07/2023	5 participants from employee 9 participants from employee.	
		4 th Meeting	05/10/2023	9 participants from employee 10 participants from employee.	
	h)	Emergency resp and boiler dated the Emergency the chemical sp conducted Fire I			
	i)	and Chemical S	store. The first aid	ere available at Boiler Station kits were well equipped with t. All items were seen to be	



Criterio	on / Indicator	Assessment Findings	Compliance
		replenished at monitored regularly as per the monitoring checklist. The First Aid Kit holders were aware on how to use the items in case of an emergency. First Aid Training was conducted on 02/10/2022. j) Accident records were maintained and updated monthly at the mill. All the accident has been discussed in the OSH quarterly meeting. The JKKP 8 form have been submitted for the year ending 2022 on 25/01/2023 with reference number JKK P8/17052/2023. As for 2023 to date there were no accident cases with TLA in the mill.	
Criterio	n 4.4.5: Employment conditions		
4.4.5.1	The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees. - Major compliance -	Management has developed policy on good social practices policy. All related policies has been published in the company website under Policies Section. Refer https://johorplantations.com/corporate-governance/ Briefing of the policy was conducted on: Palong Cocoa POM: 06/08/2023	Complied
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - Major compliance -	Management has developed policy on not engage in or support discriminatory practices policy. All related policies has been published in the company website under Policies Section. Refer https://johorplantations.com/corporate-governance/ Briefing of the policy was conducted on: Palong Cocoa POM: 06/08/2023 Based on interview with internal and external stakeholders, management has provided equal opportunity and treatment regardless of race, colour, sex, religion, political opinion,	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		nationality, social origin or any other distinguishing characteristics.	
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance -	Management has ensured that their employees pay, and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. Employment contract was signed by the workers. Pay and conditions are documented and above the Minimum Wage Order 2022. Sampled of the employment contracts confirmed that terms and conditions are clearly outlined as per NUPW/ MAPA collective agreement and Minimum Wages Order 2022. Refer sample of work agreement and payslip of the month May and August 2023: Palong Cocoa POM 1. Employee ID: E84000018X 2. Employee ID: E84000015X 4. Employee ID: E84000015X 5. Employee ID: E84000023X 6. Employee ID: E84000023X 7. Employee ID: E84000028X 8. Employee ID: E84000031X 10. Employee ID: E8400003XX	Complied
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.	Palong Cocoa POM does not engage any contractor to work full time in the mill. Contractor for transporter was assigned by HQ and all document related was verified by the HQ level. Sample of transporter as below:	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		Sample 1 Contractor: YXXXXXX EXXXXXXX Sdn Bhd Job: CPO Transporter Validity: 01/06/2023 to 30/06/2024 Reference: JPB/CTD/77/29/2023/1(NFH) Sample 2 Contractor: TXX TXXX KXXXX Sdn Bhd Job: CPO Transporter Validity: 01/06/2023 to 30/06/2024 Reference: JPB/CTD/76/29/2023/1(NFH)	
4.4.5.5	The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. - Major compliance -	Palong Cocoa POM have listed all the employees details in the Employee Master. Details such as full name, gender, date of birth, date of entry, job description and type of wages was found in the system. Besides, a hardcopy of Registration Card/ Employee Card was implemented to fill in all the basic information of the workers.	Complied
4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records. - Major compliance -	The employees that recruited by the mill are from local and foreign workers. They are either under direct employment to the management σ contractor' workers. All of them have signed on the employment contract prior to work. Verified sample of employment contracts. Sample as per 4.4.5.3.	Complied
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. - Major compliance -	Mill management was using system K Plant for record all the daily attendance was recorded by checkroll attendance and scan barcode using K-PLANT system on daily basis and overtime was recorded in the Overtime Form. Sample as per 4.4.5.3.	Complied

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Criterion / Indicator		Assessment Findings	Compliance	
4.4.5.8	The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable. - Major compliance -	Interviewed with workers and document reviewed on the Overtime Form as well as payslip shown that the overtime payments are in accordance to law and workers are not forced to work overtime. Limit approved by JTK was 130 hours.	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 -	Wages and overtime were paid according to the overtime form and attendance report. Total hours of overtime and daily attendance has recorded in Attendance report in the system. Sample as per 4.4.5.3.	Complied	
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings.	The company provided free medical facilities to all the workers. Subsidized of water and electricity were given to all the workers. Besides, free school uniforms to the children of workers and provide free transportation to send the children of workers to school.	Complied	
	- Minor compliance -			
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities. - Major compliance -	The workers were provided with free housing facilities, free water supply and subsidized of electricity. Estate Hospital Assistant has carried out linesite inspection on weekly basis at Mills. Verified that management was in progress to provide new bed with mattress and also cupboard. Sighted evidence in the CAPEX and budget for refurbished the line site.	Complied	
		Seen the record of line site inspection latest on October 2023. There was no issue raised during the inspection. The report of inspection will be verified and approved by the AssistantManager and Manager.		
4.4.5.12	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	Management has developed policy on Sexual Harassment and Core Labour Standard Policy. All related policies has been published in the company website under Policies Section. Refer	Complied	



Criterio	n / Indicator	Assessment Findings	Compliance
		https://johorplantations.com/corporate-governance/ A Women on Ward (WOW) committee was established in the Palong POM and seen the name list of complaint panel for WOW with contact number for the workers to report if there any complaint. Briefing of the function of WOW Panel was conducted during meeting. No issue was reported during the meeting. Interviewed with the female workers confirmed that they are aware of the complaint procedure and informed that no sexual harassment and violence case report so far. Latest meeting recorded on: Palong POM: 09/10/2023	
4.4.5.13	The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. - Major compliance -	Management has developed policy on respect the right of all employees to form union or join trade union. All related policies has been published in the company website under Policies Section. Refer https://johorplantations.com/corporate-governance/ Interviewed with the workers confirmed that they are free to join NUPW without any restriction from management. NUPW meeting between management and union committee was conducted and meeting minutes was sighted. Any concern was discussed during the meeting and action was taken on the issue raised. Latest meeting was sighted on: Palong POM: 04/10/2023	Complied
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. - Major compliance -	Management has developed policy on Children and young persons shall not be employed or exploited. All related policies have been published in the company website under Policies Section. Refer https://johorplantations.com/corporate-governance/ Verified the master list of the workers confirmed that the minimum age of workers employed are 18 years old.	Complied



Criterion / Indicator			Assessment I	Findings	Compliance		
Criterio	n 4.4.6: Training and competency						
4.4.6.1	All employees and contractors shall be appropriately trained. training programme shall include regular assessment of trainin needs and documentation, including records of training.	recor	ing records are maintained by ds at Operating as follows: g Cocoa POM	Operating Unit. Sample some	Complied		
	- Major compliance -	No 1 2 3 4 5 6 7	Training Policy Briefing Training Waste Clearing and landfill Schedule waste Water treatment First Aid Training PPE usage Fire Drill Training	Date 16/07/2023 21/05/2023 17/07/2023 17/07/2023 26/06 & 13/10 2023 24/08/2023 PPE usage			
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes order to provide the specific skill and competency required to a employees based on their job description. - Major compliance -	Staff/	Training needs was done by issuance of 'Proposal for Executive/ Staff/ Workers Training" by the HOD and sighted documented proposal for conducted Refresh Training MSPO, Lab Procedure, MSPO Awareness etc.				
4.4.6.3	A continuous training programme shall be planned an implemented to ensure that all employees are well trained in the job function and responsibility in accordance to the documente training procedure. - Minor compliance -	r Staff/ d propo MSPC	Staff/ Workers Training" by the HOD and sighted documented				



Criterion / Indicator		Assessment Findings	Compliance
Criterio	n 4.5.1: Environmental Management Plan		
4.5.1.1	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented. - Major compliance -	There is an Environmental Policy for the mill issued and endorsed in 01/10/2021 by the Managing Director. Inside the policy among others has stated that the Company is committed to protecting the environment and conserving biodiversity through sustainable development. This is policy is prominently displayed in the office along with other Company's Policies.	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 Environmental Policy KMB is available with the objectives stated therein. The Policy is signed by the Managing Director dated 01/10/2021 The environmental improvement plan dated 15/09/2023 aspects and impact evaluation covers the following areas/activities; a) boiler operation b) power generation c) crude palm oil storage leakage and spillage d) effluent pond ruptured/spillage e) Dust emission /dark smoke f) EFB /SW disposal g) anaerobic process release of gas to atmosphere Inclusive is the reduction of pollution and emission management plan.	Complied
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored. - Major compliance -	This plan is available and updated for the FY 2023. The environmental issues for improvement outlined by Palong Cocoa Palm Oil Mill are shown below; Environmental issues Mitigating Measures	Complied



Criterio	on / Indicator		Asses	sment Findings	Compliance
		2	To comply with Clean Air Regulations 2014 Discharge of effluent	To improve boiler air emission through ESP installation. Control of BOD - installation of dewatering sludge screw press	
			spillage	Inspection of tank and machine condition Established ERP	
			Emission of dark smoke	To monitor CEMS, CCTV record of dark smoke	
		5	Disposal of EFB/waste/SW	Perimeter drain monitoring and education to employees	
		6	Waste water cleaning	PCD inspected regularly and samples analysis. Immediate action in event of overflow and spillage	
			actions are to be monitor e plan.	red on the indicated frequency shown in	
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Im		borated in indicator 4.5.1.3 above. both short and long terms are detailed es.	Complied
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives. - Major compliance -	A ton Income ma	Complied		
		2	Subject PCD Maintenance Waste Management RSPO /MSPO Awarenes Scheduled Waste mana		

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Criterio	on / Indicator		Assessment Fi	ndings	Compliance
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -		Water treatment plant Chemical Handling Biodiversity Awareness Fire Prevention / Drill forum used by the mill in discussing ity among others as shown below: Quarterly ESH meetings (sighted under item Biogas /effluent. Annual management review emphasized more on issues on electricity use, diesel consumption plan, renewable energy, aspect/imp. The Environmental Performance M to comply with the DOE required Regulation (GSR). The meeting performance within the POM. 15/6/2023, 19/3/2023 and 11/10 verified.	Complied	
Criterio	n 4.5.2: Efficiency of energy use and use of renewable energy				
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period - Major compliance -	The election generated communications also renerated for	Complied		



Criterion / Indicator			Assessr	nent	Findings		Compliance		
		diesel. Details of the data/records maintained by the mill were sighted;							
	-		nsumption & rat eline set at 0.23)		sel used /mt	FFB compiled for			
	b) E	lectricity	produced kWh a	nd ratio	o over mt FFI	В			
	Varia	tion of ra	tio in the analysis	s were	explained an	nd justified			
			nergy managem among others;	ent p	lan 2022 th	ne mill aimed for			
	- Edu	cate work	kers on fuel savir	ng prac	tice				
	- Avo	id leakag	es during vehicle	s main	tenance.				
		Month	Diesel/FFB		Month	Diesel/FFB			
	1	Jan	0.31	7	July	0.28			
	2	Feb	0.29	8	Aug	0.30			
	3	Mac	0.37	9	Sept	0.33			
	4		0.36	10	Oct	0.33			
	5		0.25	11	Nov	0.34			
	6	1	0.25	12	Dec	0.31			
		B/line	0.23		Total	66639			
		Month	Kwh		Month	Kwh			
	1	Jan	48269	7	July	27328			
	2	Feb	29812	8	Aug	23331			
	3	Mac	28562	9	Sept	19279			
	4	April	26298	10	Oct	19174			
	5	May	30766	11	Nov	16689			
	6	Jun	22890	12	Dec	18037			



Criterio	Criterion / Indicator		Assessment Findings					
4.5.2.2	Palm oil millers shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. - Major compliance -	The m the FF a) all (D b) fib In this mt oth	Complied					
			FFB Prod.	Fibre produced	Fibre %	Shell produced	Shell %	
		Jan	14655	2014	13.74	836	5.70	
		Feb	13592	1893	13.93	780	5.74	
		Mac	14922	2170	14.54	891	5.97	
		April	15477	2314	14.95	888	5.74	
		May	16164	2365	14.63	909	5.62	
		Jun	17313 17262	2531 2446	14.62	979 959	5.65 5.55	
		July Aug	19711	2897	14.17 14.70	1134	5.75	
		Sept	20239	3003	14.84	1177	5.82	
		Oct	21587	3262	15.11	1351	6.26	
		Nov	22559	3456	15.32	1399	6.20	
		Dec	20665	3133	15.16	1270	6.15	
		Total	214147	31484	14.70	12572	5.87	
		This ratio varies from one mill to another subject to the milling capacity and type of boiler /heating surface/boiler age. The estimate for the usage is provided in the mill applied budget.						
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	The fi	for the usage is provided in the mill annual budget. The fiber and shell are used in the boiler for fuel recycled in the process system. Surplus quantity of shell/fibre are delivered to estates for multi purposes or sold to outside buyers. EFB is used in					



Criterio	on / Indicator			Assessment Find	lings	Compliance
			e estates for ed in the mi			
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 -	Ма	nagement	pollution are identified and Plan 2023. The waste shown below;		Complied
		1	Waste Scheduled Waste	Item Spent lubricants /hydraulic oil Used batteries/ used rags /empty containers Hexane/spent chemicals/empty containers	Sources Workshop activities Workshop activities Laboratory and boiler station	
		2	Domestic Waste	Rubbish Sewage	Line site/office & mill complex Line site/office & mill complex	
		Th fro	m the boile tire operat	POME FR F mill pollution generated from the ions. These reports are reports. There was no major iss	Effluent Treatment Plant EFB station. rom the mill is the smoke stack emission during the eviewed by the mill and	
4.5.3.2	A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for: a) Identifying and monitoring sources of waste and pollution. b) Improving the efficiency and recycling potential of mill by-	list inc	ed the wa	nagement Plan 2023 is available ste generated from the mi 3.1 above. The management improvement are described Item Ac	Il operations as shown in t of the waste aimed for a	Complied



Criterio	on / Indicator		Compliance		
	products by converting them into value-added products. - Major compliance -	Scheduled waste	Spent lubricants / hydraulic oil Used batteries/ used rags / empty containers Hexane/spent chemicals/ empty containers	SOP on SW management Compliance to Environmental Quality Regulation 2005; Establishment & notification of SW Labeling & Coding of SW SW Inventory Disposal < 180 days & approved quantity/volume.	
		Domestic Waste Industrial Waste	Rubbish Sewage POME	Disposed together with the estate-to- estate landfill Disposal by local authority Monitoring of application & through operation of evaporators	
4.5.3.3	The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005 - Major compliance -	implement operations levels of the a) Level 2 c) Level 3 d) Level 4 Amendment issues/situ Among the including washed at out in co	ed. The standard of are available which he documentation of the documentation. The documentation of the documentat	Monitoring of application in the field. Waste disposal is established and operation procedure for the estates / mill ch is prepared on Group basis. There are identified as follows; gement Manual ng procedure/SPO OHS ald there be requirement to suit the local tes include empty chemical containers iters. Empty pesticides containers were prior to disposal. Disposals were carried elevant regulation of scheduled waste. documents verified for confirmation of	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		proper management and disposal. The disposed to Kualiti Alam Sdn Bhd. mill scheduled waste is scheduled waste is disposed to Kualiti Alam Sdn Bhd. Date SW429 SW409 SW410 SW305 SW102 SW110 SW408 20/9/23 0.0158 0.1619 0.1108 0.3332 0.0088 0.0052 0.0078 13/4/23 0.0876 0.1538 0.1190 0.2393 0.0374 0.0128 0.0150	
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. - Minor compliance -	Domestic waste disposal for the Palong Cocoa Mill are made to the Palong Estate (Kemedak Division) landfill at field no P12/K5. Collection 2 to 3 times a week.	Complied
Criterio	n 4.5.4: Reduction of pollution and emission including greenhou	ise gas	
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent. - Major compliance -		Complied



Criterion / Indicator		Assessment Findings					
	an	d mill operation					
		Environmental Receptors	S	ource			
	1	Air	Air emissions - from particulate), vehicle & gen GHG emission from anaer dumping).	erator (smok obic process	ke and gases). ses (ETP, EFB		
	2	Water	Water discharges – Clear station waters (h condensate/clarification water and blow down	ydro cy	clone/sterilizer		
	3	Land	Land – Scheduled wast industrial / process was generated from clinics.				
	boi als (CI fou onl DC	iler stack. Resion equipped in EMS). The audured to be in fulline to DOE's DE limit. Resul	Il conducted boiler stack ults were within the acce with a Continuous Emisit team has verified the conctional condition. Data froffice. Boiler smoke emisits dated 04/09/2023. Ar Bhd, Kuala Lumpur.	ptable limit ssion Moni ondition of om the stac ssion data	toring System the CEMS was ck is connected are within the		
		Paramete Stack gas	er	Result 53.80	Standard -		
	2	Particle m	nass flow rate	4.61 93-104	-		
	4	Average	particulate concentration	128 268	150 1000		
4.5.4.2 An action plan to reduce identified significant pollutants and	╁┶╴		ons due to the operations			Complied	



Criterio	on / Indicator		As	ssessm	ent Findii	ngs		Compliance
	emissions shall be established and implemented Major compliance -	and	he palm GHG versio estate includes re anic fertilizer and ins					
		2	consumption at operation Reduce smoke emiss the air	diesel 7 r r sion to 6 age 1 F	To effectively eliminate use Monitor usage Install capacit bower consur	hicle schedu optimum go implement of wet she e vs baselin tor at identi mption moto	uled en set usage the CEMS Il as fuel e ified large	
4.5.4.3	Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations. - Major compliance -	app repo 30/0 peri 1 2 3 4 5 6 7 8	COD A Nitrogen Total N Oil & Grease S Solids	state Muited to DC rly basis Among STD 5-9 2500	ngka Division DE (license states). Latest surporters the interpretation of the states	on P12. Sino 004720 bmission ndicators value	ghted quarterly 0) 01/07/2023 - for to DOE for were: 07/9/23 7.50 990 7726 381 576 0.00 3820 13364	Complied



Criterio	on / Indicator			Assessment Finding	S		Compliance
Criterio	n 4.5.5: Natural water resources						
4.5.5.1	The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: a) Assessment of water usage and sources. b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities. c) Ways to optimize water and nutrient usage and reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). - Major compliance -	wa	as last reviewe e the following Contingency Area/incident Water shortage/ prolonged dry season	To obtain water from SAJ To train/educate staff/workers water To seek assistance from SAJ To obtain treated water supply WTP To obtain water from SAJ To train/educate staff/workers water To seek assistance from SAJ To obtain treated water supply.	plan. Included and verification to conserve outsourced PIC Mill Engineer	PIC Mill Executives/ Staff Mill	Complied



Criterion / Indicator			Compliance			
		Identification & management of wastewater				
		Location	Wastewater produced	Treatment/ containment	Reuse/recycle/ disposal method	
	1	Processing stations	Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water	Oil recovery/ ETP	Recover into system	
	2	Boiler	Blow down, cleaning water	Sludge pit, ETP	Monsoon drain	
	3	Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain	
	4	Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank	Monsoon drain	
	5	Laboratory	Cleaning water	Process drain	Monsoon drain	
	6	Washroom	Toilet water, cleaning water	Septic tank	Supernatant to drains, sludge collected by licensed contractor.	
	res de Re	storing appo stailed in the eserve in Ku	and wetlands are pro ropriate riparian buff e River Reserve Mana Ilim Malaysia Berhad ned are as following:	fer zones. The agement (Mana	e guidelines are agement of River	
		1	River width (Meters) >40		one (Meters) 50	



Criterion / Indicator		Assessment Findings				
	2 20-40				40	
	3		10-20		20	
	4		5-10		10	
	5		<5		5	
	Water u	sage for 202	22 utilized fo	or processing as	shown below	
		Month	Water /		Water /FFB]
	1	Jan	19179		1.31	
	2	Feb	18013		1.33]
	3	Mac	23529		1.58]
	4	April	22366		1.45]
	5	May	21370		1.32]
	6	Jun	22764		1.31]
	7	July	22461		1.30]
	8	Aug	27272		1.38	1
	9	Sept	27483		1.36]
	10	Oct	25939		1.20	1
	11	Nov	24172		1.07	1
	12	Dec	26188		1.27	1
		Total	280736	5 214147	1.31]
				vater analysis at		
				DOE Jadual Pen		ement.
	Details a	as follows. A	ll units in m	ng/I except for pl	Ⅎ.	
		Parameter	STD	02/04/2023	04/07/2023	
			Hu	ulu Hilir	Hulu Hilir	
	1	pН	6-9 6	.9 6.0	7.2 6.7	
	2	BOD		10 <10	<10 <10	
	3	COD		<5 <5	14 7	
	4	A Nitrogen		25 0.20	0.27 0.23	
	5	DO		47 4.25	6.48 6.27	
	7	TD Solids	- 14	48 108	160 124	

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Criterio	on / Indicator	Assessment Findings	Compliance
		B Total N - 0.51 0.43 0.67 0.55 The mill relies on own water treatment. Samples were taken twice annually for domestic use standard. Results of analysis as shown below: Drinking water sampling	
4.5.5.2	Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations. - Major compliance -	Details of effluent treatment and report as per item 4.5.4.3 above. The effluent BOD limit is 2500 mg/L and land applied in Palong Cocoa Estate field no P12	Complied
4.6 Prin	ciple 6: Best Practices		
Criterio	n 4.6.1: Mill Management		
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	Palong Cocoa POM continued to implement the established procedure for mill. For Palong Cocoa POM, Standard Operating Procedure (SDPOM/QM), dated 1/2/2018 is referred to. 1. Reception Station 2. Fruit Handling 3. Sterilization 4. Threshing	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		 Empty Bunch Press Digestion and pressing Clarification Kernel Extraction Effluent Treatment & Waste Management Boiler House 	
4.6.1.2	All palm oil mills shall implement best practices. - Major compliance -	Mechanism to check consistent implementation of procedures are in place. Internal audit by SQD department conducted on annual basis to check and report compliance against company policy and procedure with regards to operation, safety, health and welfare requirements. For other to ensure consistency of SOP implementation was verification from Regional Controller Report and Plantation Inspectorate Report.	Complied
		Palong Cocoa POM 1. Inspectorate report visit 15-16/08/2023. Ref document: MKI/PCPOM 3_2023. 2. Internal audit report dated 10/09/2023 by SQD team. Crop received in year 2022: 214,147.32mt	
		Forecast in year 2023: 209,264mt Year todate as at July 2023: 78,102.80mt less by 29.12%. Compared to same period last year by 30,025.13mt. Crop process in July 2023 – 12,671.82mt less by 3,334.18mt or 20.83% against the estimate of 16,006mt.	
		The mill utilization for July 2023 is 82.50% with 24 processing days. As at Year todate 2023, the utilization is 74.41%, with 164 processing days. The utilization is low because of the mill receiving	



Criterio	on / Indicator		Assessment Findings					
		low crops.						
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 -	projection fo Sighted the 2026. In the 1. Mill intake 2. Productio 3. Productio 4. Total Palr	r 5 years prepannual budget 5 years busing - FFB input n of CPO	ared as guidan FY 2023 and ess plan includ n	2025 201,063mt 42,783mt 10,961mt 21.41% 5% RM73.83/mt	lanning. FY 2023 – FY	Complied	
Criterio	n 4.6.3: Transparent and fair price dealing							
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	6.0 of the required to s	Pricing and Term of payment of the work was stated in the Section 5.0 of the agreement. Prior to the payment, the contractor is required to submit invoices and payment of fees will be made within 15 days from the date of certification of the submitted invoices as					



Criterio	on / Indicator	Assessment Findings	Compliance
		stated in the agreement.	
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.	Sampled of the contract and payment records for contractors as below:	Complied
	- Major compliance -	Sample 1	
		Contractor: YXXXXXX EXXXXXXXX Sdn Bhd	
		Job: CPO Transporter	
		Validity: 01/06/2023 to 30/06/2024	
		Invoice date: 31/08/2023	
		Reference: YT23XX-000XX	
		Payment date: 25/09/2023	
		Sample 2	
		Contractor: TXX TXXX KXXX Sdn Bhd	
		Job: CPO Transporter	
		Validity: 01/06/2023 to 30/06/2024	
		Invoice date: 31/08/2023	
		Reference: TV23XX00XX	
		Payment date: 24/09/2023	
Criterio	n 4.6.4: Contractor		
4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.	The contractors have acknowledged on the terms and conditions for complying with all RSPO, ISCC, MSPO requirements related to the execution of the contract. The contractors have been briefed on the	Complied
	- Major compliance -	MSPO requirements prior to work and signed on the Permit to Work after being briefed.	



Criterion / Indicator		Assessment Findings	Compliance
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Mill Management has engaged contractors for varieties of works such as maintenance/ repair works and transporters. Sampled of the agreement as below: Sample 1 Contractor: YXXXXXXX EXXXXXXX Sdn Bhd Job: CPO Transporter Validity: 01/06/2023 to 30/06/2024 Reference: JPB/CTD/77/29/2023/1(NFH) Sample 2 Contractor: TXX TXXX KXXXX Sdn Bhd Job: CPO Transporter Validity: 01/06/2023 to 30/06/2024 Reference: JPB/CTD/76/29/2023/1(NFH)	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	The contractors have acknowledged that they are subject to any certification audit assessment through a physical inspection if required when agreement was signed. Refer Section 16.5 in the Contact Agreement stated "All contract operation perform by the Vendors is subjected to any certification audit assessment through a physical inspection if required".	Complied



Appendix B: Smallholder Member Details

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

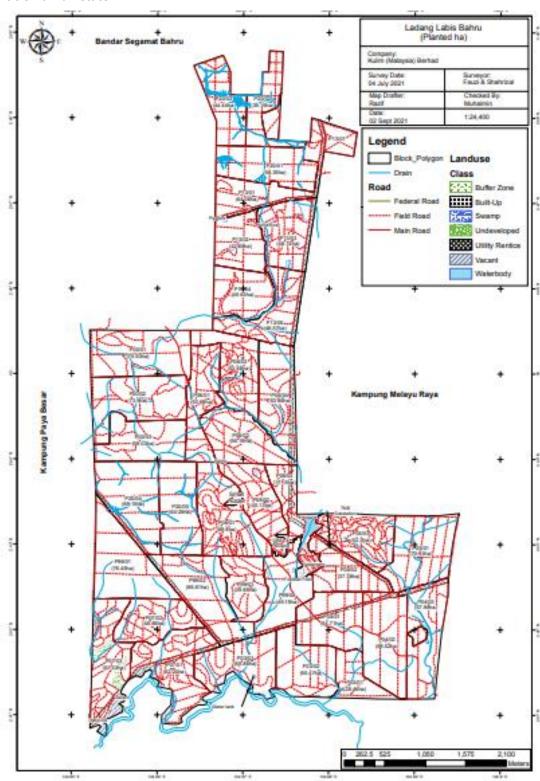


Appendix C: Location and Field Map



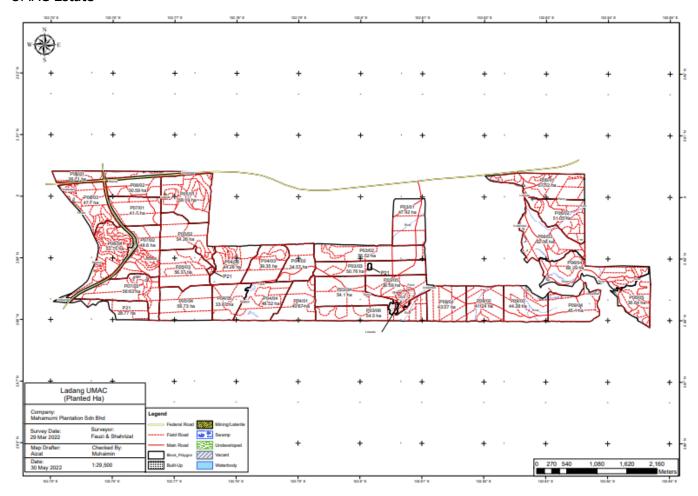


Labis Bahru Estate



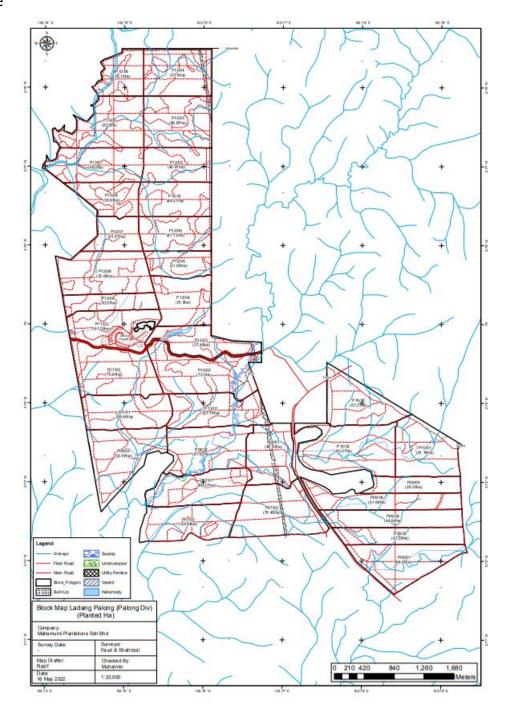


UMAC Estate

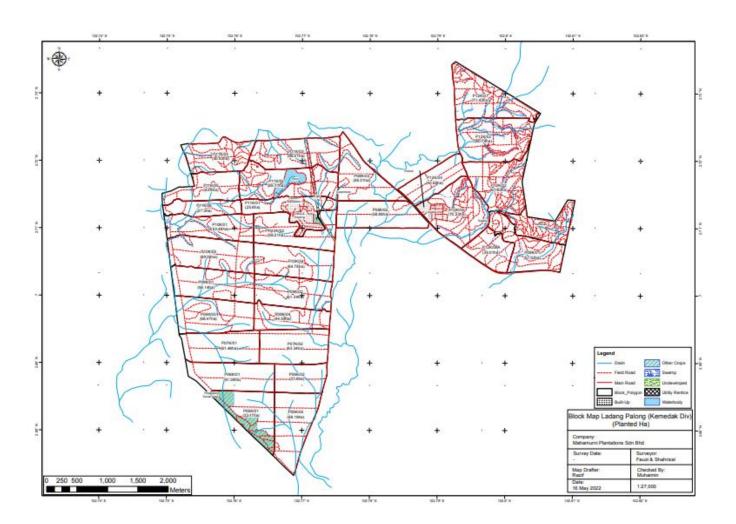




Palong Estate

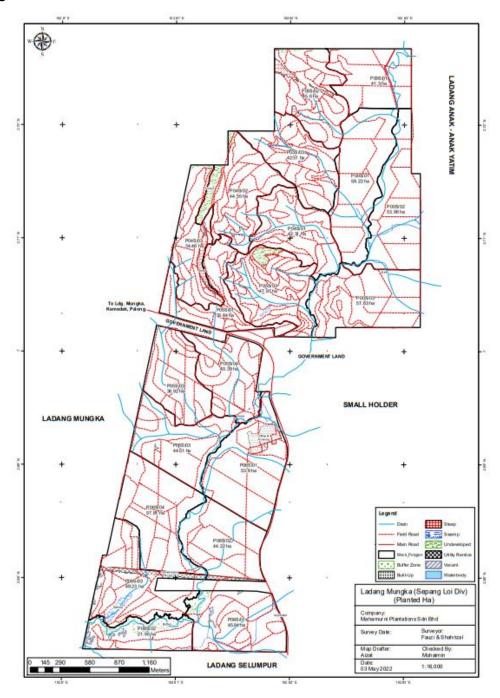




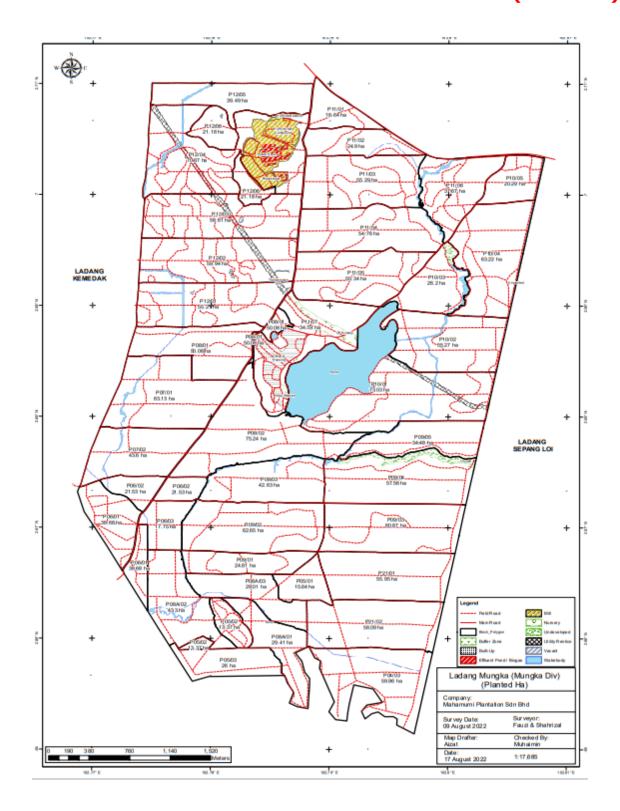




Mungka Estate









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

PK Palm Kernel
PKO Palm Kernel Oil
POM Palm Oil Mill

POME Palm Oil Mill Effluent

PPE Personal Protective Equipment

RTE Rare, Threatened or Endangered species
SEIA Social & Environmental Impact Assessment

SIA Social Impact Assessment SOP Standard Operating Procedure