

**RSPO PRINCIPLE AND CRITERIA –
1st Annual Surveillance Assessment (ASA1)
Public summary Report**

TSH Resources Berhad
Client company Address: Bangunan TSH, TB 9, KM 7, Apas Road 91000 Tawau Sabah, Malaysia
Certification Unit: Kunak Palm Oil Mill and supply base Location of Certification Unit: Mile 41, Tawau Kunak Road 91200 Tawau, Sabah, Malaysia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0173-14-000-00	Membership Approval Date	17/11/2014
Parent Company Name	TSH Resources Berhad		
Address	Bangunan TSH, TB 9, KM 7, Apas Road 9100 Tawau, Sabah, Malaysia		
Subsidiary (Certification Unit Name)	TSH Plantation Management Sdn Bhd – Kunak Palm Oil Mill		
Address	Mile 41, Tawau Kunak Road 91200 Tawau, Sabah, Malaysia		
Contact Name	Puan Rohana Parilla Binti Abdul Salam		
Website	http://www.tsh.com.my	E-mail	Rohana.SHO@tsh.com.my
Telephone	+6019 8331356	Facsimile	+6089 91300

2. Certification Information			
Certificate Number	RSPO 692556	Date of First Certification	23/08/2018
		Certificate Start Date	23/08/2018
		Certificate Expiry Date	22/08/2023
Scope of Certification	Palm oil and Palm Kernel Production		
Applicable Standards	RSPO P&C MYNI 2014; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module E)		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
Nil	n/a	n/a	n/a

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
TSH Plantation Management Sdn Bhd (Kunak Palm Oil Mill)	Mile 41, Tawau Kunak Road, Tawau, Sabah, Malaysia (#10126024 & #105392970)	04° 28' 03.05" N	118° 11' 06.57" E
TSH Kunak Plantation Management Sdn Bhd (Maju Sawit Estate)	Mile 41, Tawau Kunak Road, Tawau, Sabah, Malaysia (#10126024 & #105392970)	04° 27' 53.13" N	118° 10' 56.49" E

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LKSK Sdn Bhd (LKSK Estate)	Mile 38, Apas Balung, Ulu Kalumpang, Tawau, Sabah, Malaysia (#10125987)	04° 29' 38.02" N	118° 04' 09.06" E
Landquest Sdn Bhd (Landquest Estate)	KM 39, Semporna-Tawau Road, Sabah, Malaysia (#12125008)	04° 25' 46.36" N	118° 20' 13.11" E
Tan Soon Hong Holdings (Maju Sawit Estate - Wakuba Division)	Mile 16, Apas Road, Tawau, Sabah, Malaysia (CL105348945, CL105348954 & CL105351040)	04° 17' 13.25" N	118° 04' 17.54" E

5. Description of Supply Base

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Maju Sawit Estate	168.50	2.06	64.64	235.20	71.64
LKSK Estate	930.00	10.30	25.70	966.00	96.27
Landquest Estate	365.00	7.68	61.12	433.80	84.14
Maju Sawit Estate - Wakuba Division	15.00	-	1.00	16.00	93.75
Total	1,478.50	20.04	152.46	1,651.00	89.55

6. Plantings & Cycle

Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Maju Sawit Estate	66.00	11.00	-	91.50	-	102.50	66.00
LKSK Estate	58.00	-	764.00	108.00	-	872.00	58.00
Landquest Estate	219.00	-	60.00	86.00	-	146.00	219.00
Maju Sawit Estate -Wakuba Division	3.00	12.00	-	-	-	12.00	3.00
Total (ha)	346.00	23.00	824.00	285.50	-	1,132.50	346.00

7. Certified Tonnage of FFB (Own Certified Scope)

Estate	Tonnage / year		
	Estimated (Aug 2018 – Jul 2019)	Actual (May 2018 – May 2019)	Forecast (Aug 2019 – Jul 2020)
Maju Sawit Estate	3,050.00 mt	2,766.72 mt	3,050.00 mt
LKSK Estate	23,250.00 mt	21,765.06 mt	23,250.00 mt

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Landquest Estate	4,706.00 mt	4,269.94 mt	4,706.00 mt
Maju Sawit Estate - Wakuba Division	300.00 mt	409.42 mt	300.00 mt
Total (ha)	31,306.00 mt	29,211.14 mt	31,306.00 mt

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *

Estate	Tonnage / year		
	Estimated (Aug 2018 – Jul 2019)	Actual (May 2018 – May 2019)	Forecast (Aug 2019 – Jul 2020)
Nil	N/A	Nil	N/A
Total			

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable

Independent FFB Supplier	Tonnage / year		
	Estimated (Aug 2018 – Jul 2019)	Actual (May 2018 – May 2019)	Forecast (Aug 2019 – Jul 2020)
External suppliers	415,000.00 mt	445,767.80 mt	415,000.00 mt

10. Certified Tonnage

Mill Capacity: 75 MT/hr	Estimated (Aug 2018 – Jul 2019)	Actual (May 2018 – May 2019)	Forecast (Aug 2019 – Jul 2020)
	FFB*	FFB	FFB
	35,706.00 mt	29,211.14 mt	31,306.00 mt
SCC Model: MB	CPO* (OER: 20.50%)	CPO (OER: 21.03%)	CPO (OER: 20.5%)
	7,418.00 mt	6,142.65 mt	6,418.00 mt
	PK* (KER: 5.5%)	PK (KER: 5.32%)	PK (KER: 5.5%)
	2,122.00 mt	1,554.35 mt	1,722.00 mt

*including volume extension until 22/09/2019

11. Actual Sold Volume (CPO) (May 2018-May 2019)

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	4,199.36 mt	0	0	0	4,199.36 mt

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12. Actual Sold Volume (PK) (May 2018-May 2019)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	1,125.14 mt	0	0	0	1,125.14 mt

13. Actual Group certification Claims		
	Credit	Physical Volume (MT)
IS-CSP0	n/a	n/a
IS-CSPK0	n/a	n/a
IS-CSPKE	n/a	n/a

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29
The Garden North Tower
Mid Valley City
Lingkaran Syed Putra
59200 Kuala Lumpur
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BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The on-site 1st annual surveillance assessment was conducted from 17-21/06/2019. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criterias 2013 (MY-NI 2014) and RSPO Supply Chain Certification Standard 2017 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 approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base.

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (0.8\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula $(0.8\sqrt{y}) \times (z)$; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO 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.

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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 3.5.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment/annual surveillance assessment are detailed in Section 3.4.

This report is structured to provide a summary of assessment finding as attached in the Appendix A. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

For Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification Reviewer prior to certification 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 / Supply Base)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Kunak Palm Oil Mill	✓	✓	✓	✓	✓
LKSK Estate	✓	✓	✓	✓	✓
Landquest Estate	✓	✓	✓	✓	✓
Maju Sawit Estate (Including outlaying estate, Wakuba Estate)	-	✓	✓	✓	✓

Tentative Date of Next Visit: May 10, 2020 – May 13, 2020

Total No. of Mandays: 13.0 mandays (including 1.0 manday for supply chain)

2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Hafriazhar Mohd Mokhtar	Team Leader	Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and

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		Thailand. He has been trained in the RSPO P&C and SCCS standards and recently completed his RSPO P&C Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea and Solomon Islands. During assessment, he covered the mill and estate best practices, legal issues, social issues, workers consultation, stakeholder consultation, environmental and occupational safety & health. He is fluent in Bahasa Malaysia and English languages.
Mahzan Munap	Team Member	He holds a MBA from Ohio University and B Sc. in Petroleum Engineering from University of Missouri, USA. Collected over 370 days of auditing experience in OHSAS 18001 and MS 1722 OHSMS (72 days for palm oil milling and 8 days for oil palm plantation). CIMAH competent person with Malaysia Department of Occupational Safety and Health (DOSH) since 1997. An Occupational Safety and Health Trainer at INSTEP PETRONAS. Successfully completed RSPO Lead Assessor Course in 2008 and IRCA accredited Lead Assessor training for ISO 9001 and RABQSA/IRCA EMS Lead Assessor Course for ISO 14001 in 2008. During this assessment, he covered Mill & Estate Best Practices, Legal, OSH, Workers Consultation & etc.
Amir Bahari	Team Member	He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996. 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. During the assessment he covered mills and estates best practices, workers consultation and occupational safety & health. He is fluent in both verbal/written in Bahasa Malaysia and English.

Accompanying Persons:

No.	Name	Role
Nil	n/a	n/a

2.3 Assessment Plan

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

Date	Time	Subjects	HMM	MM	AB
Sunday 16/6/2019	1440 – 1730	Audit Team travel to Tawau via AK 9314 (KUL - TWU) & Check-in @ LA Hotel Tawau	✓	✓	✓
Monday 17/6/2019	0830 – 0900	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader • Confirmation of assessment scope and finalize • Audit plan (including stakeholder’s consultation) • Verification on previous audit findings 	✓	✓	✓

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Date	Time	Subjects	HMM	MM	AB
	0900 – 1230	Kunak Palm Oil Mill: Inspection of FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.	✓	✓	✓
	1230 – 1330	Lunch			
	1330 – 1630	Kunak Palm Oil Mill: Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities.	✓	✓	✓
	1630 – 1700	Interim Closing Briefing	✓	✓	✓
Tuesday 18/6/2019	0900 – 1230	Maju Sawit Estate: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant & etc.), agrochemical mixing area, schedule waste management, worker housing, clinic, landfill & etc.	✓	✓	✓
	1030 – 1230	Meeting with stakeholders	✓	-	-
	1230 – 1330	Lunch			
	1330 – 1630	Maju Sawit Estate: Document review P1 – P8: General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	✓	✓	✓
	1630 – 1700	Interim Closing Briefing	✓	✓	✓

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Date	Time	Subjects	HMM	MM	AB
Wednesday 19/6/2019	0900 – 1230	Landquest Estate: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant & etc.), agrochemical mixing area, schedule waste management, worker housing, clinic, landfill & etc.	✓	✓	✓
	1230 – 1330	Lunch			
	1330 – 1630	Landquest Estate: Document review P1 – P8: General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	✓	✓	✓
Thursday 20/6/2019	0900 – 1230	LKSK Estate: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant & etc.), agrochemical mixing area, schedule waste management, worker housing, clinic, landfill & etc.	✓	✓	✓
	1230 – 1330	Lunch			
	1330 – 1630	LKSK Estate: Document review P1 – P8: General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	✓	✓	✓
	1920 – 2210	Audit Team travel back to KL via AK 5741 (TWU – KUL)	-	✓	✓
Friday 21/6/2019	0830 – 1630	Kunak Palm Oil Mill: RSPO Supply Chain for CPO mill, weighbridge and storage area	✓	-	-
	1630 – 1700	Closing Meeting <ul style="list-style-type: none"> • Presentation of report by BSI Lead Auditor – briefing & discussion of findings • Acceptance & acknowledgement by Kunak Palm Oil Mill & Estates 	✓	-	-

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Date	Time	Subjects	HMM	MM	AB
	1920 – 2210	Audit Team travel back to KL via AK 5741 (TWU – KUL)	✓	-	-

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- TSH Resources Berhad Multiple Management Units / Time Bound Plan
- RSPO P&C 2013 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C GA-NIWG 2017
- RSPO P&C INA-NIWG 2016
- RSPO P&C MY-NIWG 2014
- RSPO P&C PNG-NIWG 2017

3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills?	The time bound plan includes all operating units in Malaysia and Indonesia. Since joining RSPO as processor and trader on 17/11/2014, TSH Resources Bhd. (hereinafter referred to as TSH) has developed its Sustainable Palm Policy as in the Roundtable of Sustainable Palm Oil (RSPO) Manual; Doc. no.: TSHR/RSPO; Rev. no.: 1; dated 12/6/2016. For Malaysia operations, the plan was to certify Lahad Datu operating unit which was in-line with certification audit conducted on November 2016. On 2017 onwards, the plan was to certify Sabahan complex and Kunak complex on annual basis. For Indonesia operations, one unit operation, PT Sarana Multi Niaga Palm Oil Mill, has been certified since May 2016. The plan was also to certify the rest of operating units complex in Indonesia on annual basis in 2017 onwards.	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	Certifications of all estates and mills within TSH group were in progress since obtaining of membership in November 2014.	Yes
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	No any new acquisitions since the last audit	Yes
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required.	No changes for the existing TBP as well as not applicable since no new acquisitions. This is consistent with the latest ACOP reporting i.e. RSPO Annual Communications of Progress 2017	Yes

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Is this consistent with the ACOP reporting?	report. 2018 report still on-going as of the date of audit.	
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No any isolated lapses in implementation of TBP so far.	Yes
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No any fundamental failure to proceed with the implementation of TBP so far.	Yes
Have there been any stakeholder comments?	No any stakeholder comments received except for sighted in records at site.	Yes
Un-Certified Units or Holdings		
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	Internal TSH competent personnel conducted Biodiversity assessment & HCV identification within Lahad Datu POM and estates landholdings. Report was prepared by the sustainability team; in-line with the report of EIA i.e. Proposed Replanting of 3007 Hectares Oil Palm Plantation at Ong Yah Ho Estate and Gomantong Estate on Land Title Nos. CL095327218 and CL095310731, in the District of Kinabatangan, Sabah. The objective of this assessment is having additional ground check on the existing identified HCV area done on 2007 in order to be detailed and accurate in database and mapping. Based on the report and evidence from on-site visit as of the audit date, no replacement were done after dates defined in Nis Criterion 7.3.	Yes
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No new plantings since 2005 except for replanting activity.	Yes
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6. The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker . The progress on the Liabilities shall be verified and reported.	As of the date of the report being produced, there is no any comment by stakeholder that could be taken action by TSH. Further details please refer to the RSPO Complaints Website: http://www.rspo.org/members/status-of-complaints?keywords=TSH TSH has been submitted a total of 11 LUCA for 11 management units with potential liability. 8 LUCA review ongoing, 1 requiring clarification, 1 passed and 9 requiring concept note as per tracker https://www.rspo.org/certification/remediation-and-compensation/racp-tracker .	Yes

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Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	Since the closure of previous findings, no stakeholder comments or complaints received.	Yes
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	None noted. No stakeholder comments or complaints received.	Yes
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Prior to the certification audit, Internal Audit for Kunak POM and supply base was conducted by Sustainability department, the latest internal audit was conducted on 24-26/9/2018 by QA Team for mill and both estates to cover the entire criterion stated in the standard. Periodical assessment were also planned and conducted for all operating units in both Malaysia and Indonesia. A positive assurance statement has been produced through this periodical assessment and internal audit.	Yes

3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment)

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Not applicable.	N/A

3.4 Details of findings

The nonconformity is listed below. The summary report of the assessment by criteria is listed in Appendix A.

During the Annual Surveillance Assessment there were 4 (four) Minor Nonconformities raised. The Kunak Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1791700-201904-N1	Clause & Category (Major / Minor)	Indicator 2.1.3 Minor
Date Issued	21/06/2019	Due Date	Next annual surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	1. The requirement as required by CHRA report as per OSH (USECHH) Reg. 2000 <ul style="list-style-type: none"> • Regulation 25: current SDS • Regulation 29: Warning Signs • Guidelines on Control of Chemicals Hazardous to Health 5.5. Safe Work System and Practices 5.5.1 Safe Work System b. SOP not followed and Regulation 16: use of approved PPE 2. SOP not followed and regulation 16: use of approval PPE		
Requirement Reference:	A mechanism for ensuring compliance shall be implemented		
Objective Evidence:	1. Found the recommendation by CHRA Assessor done on 11.10.2017 not actioned at the following areas: <ul style="list-style-type: none"> • Chemical store • Mixing bay • Diesel Storage Tank • No guarding at belting and no dust cover at grinder 2. See SOP Welding issued by TSHR SHO 30 November 2017 Workshop – Incorrect category of glove given instead of leather as stated in SOP		
Corrections:	1. Continues with the plan for CHRA implementation. 2. Repurchase the PPE following the standard given in the TSHR/OSH/WI02		
Root Cause Analysis:	1. The system are already in place as per the SOP, unfortunately continuous site implementation is with loopholes due to changes in PIC for site management. 2. Welding gloves purchased with wrong code during the PR Raised in April'2019.		
Corrective Actions:	1. Quarterly OSH Inspection checklist by Site Safety PIC to include the CHRA requirements. 2. PPE inspection form to specify the type of PPE required to be used at workstation for estates as per TSHR/OSH/WI02		
Assessment Conclusion:	CAP accepted. Evidence of effectiveness of CAP to be verified in next surveillance assessment.		

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1788381-201904-N2	Clause & Category (Major / Minor)	Indicator 4.1.2 Minor
Date Issued	21/06/2019	Due Date	Next annual surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"

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Statement of Nonconformity:	1. The field condition has not been satisfactorily maintained as per SOP 2. Housing area condition was not satisfactorily maintained
Requirement Reference:	A mechanism to check consistent implementation of procedures shall be in place
Objective Evidence:	1. During the site visit to Maju Sawit Estate PR field 2019 the palm circles and creepers has not been maintained. Field conditions were grassy and with spraying delayed 2. Following evidence found: i. Sighted "hanging concrete drain" in-front of mill housing # ML1B not being attended. ii. Cleanliness was not so well ensured with visible rubbish dumped nearby the drain iii. Verified the inspection form (Borang Pemeriksaan Perumahan, Dewan Komuniti Pusat Jagaan Kanak-kanak & Sekolah; Form # TSHR/CL/F14; Rev. # 1; Date: 1/8/2018) for Week 1, 2 & 4 of May 2019 in Kunak POM & Maju Sawit Estate housing area shown consistent comments by inspector with no improvement on the following: - Water found bit turbid - Stray dogs number kept on increased - Limited availability of dustbin in housing area
Corrections:	1. Revised the current schedule for weeding 2. As following: i. Repair the hanging drain ii. Refresher awareness program to be increased to 2X Annual to increase the awareness of domestic & recycled waste handling to Bio-Complex Housing occupants iii. As following: - Send water for testing to verify the turbidity come from housing pipe or supply tank and monitor the results for the scheduled frequency of 2X testing per annum. - Established a team to trap & transfer dogs from housing compound to acceptable area. - Purchase additional waste bin
Root Cause Analysis:	1. Insufficient headcount to conduct manual weeding for the immature area and heavy rain during these few months causing the weeding schedule has to be delayed and weeds grow faster than during dry season. 2. As following: i. The heavy rainfall since April 2019 causing the high land erosion under this concrete drain. ii. The rubbish from housing are collected daily by Mill's Facility department but maybe since 1 bin shared between 2 houses causing the waste overflow by the end of the day. iii. - Heavy rain in May causing water at catchment become cloudy and causing some the current chemical dosing insufficient during this wet season. - The dogs which are left by their owner when they resigned from TSH Group are multiplying without control and Occupants of TSH Bio-Complex also

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	<p>feeds these stray dogs causing them to stay at the complex.</p> <ul style="list-style-type: none"> - 50% of the waste bin provided to housing area are broken due to reached shelf life and not properly taken care by the occupants.
Corrective Actions:	<ol style="list-style-type: none"> 1. Current headcount for Maju Sawit workers only amount to 9 pax for 168.5 ha and 50% area has been replanted since 2018; already in progress since Mar'2019 to add an additional 6 workers for Maju Sawit. 2. As following: <ol style="list-style-type: none"> i. Drainage service & maintenance to be plan accordingly in 2~3 years. ii. Landsite inspection to monitor & report using the "Borang keluh kesah" to tracked the management action for each finding. iii. As following: <ul style="list-style-type: none"> - Conduct water sampling for 2X testing/annum until the results from the testing conducted and the feedback from Landsite inspection are in compliance. - Implement the tracking system for dogs at housing compound with tagging for those with owner, those without tagging will be send for transfer & Management come out with a memo to prohibit Bio-Complex occupants to feed stray dogs. - Refresher Awareness Program of domestic & recycle waste management to all housing occupant in Bio-Complex increase to 2X/ Annum and the MA are authorized to issue warning slip to any non-compliance's housing occupants.
Assessment Conclusion:	CAP accepted. Evidence of effectiveness of CAP to be verified in next surveillance assessment.

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1788381-201904-N3	Clause & Category (Major / Minor)	Indicator 4.6.10 Minor
Date Issued	21/06/2019	Due Date	Next annual surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	The understanding of person-in-charge on the land fill management is not sufficient		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated		
Objective Evidence:	During the site visit Maju Sawit and LKSK estates the staff concerned was unable to explain the guidelines of the landfill maintenance despite the condition of the pit looked unsatisfactory		
Corrections:	The refresher training for landfill management based on SOP conducted for utility department		
Root Cause Analysis:	The weekly landfill layering is not conducted according to SOP causing waste is ransacked by stray dogs and wild animals.		

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Corrective Actions:	The environment monitoring conducted will include the landfill inspection by site environmental PIC.
Assessment Conclusion:	CAP accepted. Evidence of effectiveness of CAP to be verified in next surveillance assessment.

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1788381-201904-N4	Clause & Category (Major / Minor)	Indicator 6.5.3 Minor
Date Issued	21/06/2019	Due Date	Next annual surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	Water supplies not adequate to the national standards or above		
Requirement Reference:	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible		
Objective Evidence:	<p>Drinking Water Quality Standard (DWQS) with reference to requirement of Water Quality Standard of National Standard for Drinking Water Quality, 2nd Version, January 2004 by Engineering Services Division, Ministry of Health, Malaysia. Analysis conducted by Dynakey Laboratories Sdn. Bhd.</p> <p>Kunak Mill & Maju Sawit Estate (Certificate of Analysis # 20190124-05B-0; Date: 19/2/2019): Colour: 17; DWQS Limit: 15 Alum 2.7 ; DWQS Limit: 0.2</p> <p>Landquest Estate (Certificate of Analysis # 20190124-07B-0; Date: 19/2/2019): Colour: 16; DWQS Limit: 15 Turbidity (NTU): 6.8; DWQS Limit: 5</p> <p>LKSK Estate (Certificate of Analysis # 20190124-06B-0; Date: 19/2/2019): Colour: 20; DWQS Limit: 10 Turbidity (NTU): 10; DWQS Limit: 5</p>		
Corrections:	To conduct drinking water sampling for confirmation of the results and continues with 2x a year to monitor these parameters.		
Root Cause Analysis:	The drinking water sampling previously conducted in 2018 shown that the results are in compliance. The sampling conducted in January are during wet season causing the turbidity of water exceeded the limit.		
Corrective Actions:	<ol style="list-style-type: none"> To study with the raw water consultant on dosing of water during wet season to prevent the occurrences of this issues. LQ to request water supply from the Jabatan Air Semporna as the water supplier (PEKAH) are bordering the LQ Estate. LKSK: to conduct study from the water sampling results & Sourcing for viable treatment. 		

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Assessment Conclusion:	CAP accepted. Evidence of effectiveness of CAP to be verified in next surveillance assessment.
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Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	Nil

1.4.1 Status of Nonconformities Previously Identified and Observations

Summary of Total Number of Nonconformity									
Nonconformity									
NCR Ref #	1633205-201804-M1	Clause & Category (Major/Minor)	RSPO SCCS 5.1.3 Major						
Closed (Yes/No)	Yes	Date of nonconformity closure	03/08/2018						
Statement of Nonconformity	Palmtrace system has yet to be registered for Kunak POM.								
Requirement Reference	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.								
Objective Evidence	No palm trace ID number for Kunak POM.								
Corrective Action	Submit the new registered number on 1/6/2018 Palm e-trace for TSH Plantation Management Sdn Bhd (Kunak Palm Oil Mill);- RSPO_PO1000007786								
Assessment Conclusion	Verification during ASA1: Company info available through RSPO IT Platform as following: <table border="1" data-bbox="491 1429 1465 1615"> <tr> <td>Member Name</td> <td>TSH Plantation Management Sdn Bhd (Kunak Palm Oil Mill)</td> </tr> <tr> <td>Member ID</td> <td>RSPO_PO1000007786</td> </tr> <tr> <td>RSPO Membership Number</td> <td>1-0173-14-000-00 (TSH Resources Berhad)</td> </tr> </table> Verification done during surveillance assessment found the evidence of corrective actions confirmed to be effective and no recurrence of issue. Hence, the Major NC remained closed.			Member Name	TSH Plantation Management Sdn Bhd (Kunak Palm Oil Mill)	Member ID	RSPO_PO1000007786	RSPO Membership Number	1-0173-14-000-00 (TSH Resources Berhad)
Member Name	TSH Plantation Management Sdn Bhd (Kunak Palm Oil Mill)								
Member ID	RSPO_PO1000007786								
RSPO Membership Number	1-0173-14-000-00 (TSH Resources Berhad)								

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1633205-201804-M2	Clause & Category (Major/Minor)	RSPO SCCS 5.3.2 Major
Closed (Yes/No)	Yes	Date of nonconformity closure	03/08/2018

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Statement of Nonconformity	The internal audit has yet to be conducted.
Requirement Reference	The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. ii) effectively implements and maintains the standard requirements within its organization
Objective Evidence	Kunak POM: No internal audit for supply chain was conducted
Corrective Action	Revised the current Audit Procedure (TSHR/AD/SOP03) to include the RSPO SC Internal audit as scope of audit. – 31/5/2018 Create new RSPO SC internal audit checklist. – 25/5/2018
Assessment Conclusion	Verification during ASA1: Audit conducted based on procedures as following: - Corrective & Preventive Action; Doc. # TSHR/QD/SOP05; Rev. # 1; Effective date: 30/11/2018 - Audit; Doc. # TSHR/QD/SOP03; Rev. # 2; Effective date: 31/05/2018 Records shown audit was conducted on 11-13/2/2019 as per sighted Audit Plan; Form # TSHR/QD/F06; Rev. # 1; Effective date: 23/3/2016 and Internal Audit Checklist (Based on RSPO Supply Chain Certification Standard); Form # TSHR/SUST/F05; Rev. # 0; Effective date: 30/5/2018. SCCS internal audit was conducted together with RSPO P&C and MSPO internal audit. Verification done during surveillance assessment found the evidence of corrective actions confirmed to be effective and no recurrence of issue. Hence, the Major NC remained closed.

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1633205-201804-M3	Clause & Category (Major/Minor)	RSPO 5.4.1 Major SCCS
Closed (Yes/No)	Yes	Date of nonconformity closure	03/08/2018
Statement of Nonconformity	The information of receiving FFB from own estate was not available		
Requirement Reference	The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form: <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; 		

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	<ul style="list-style-type: none"> • Supply Chain certificate number of the seller; • A unique identification number • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).
Objective Evidence	LKSK Estate: No record (eg: despatch note) available at Kunak POM since the transportation done by Bukit Tajam Collecting Centre.
Corrective Action	Revised BTCC WI (TSHP/OPE/WI05) to incorporate these requirements and arrangement of traceability – 31/5/2018
Assessment Conclusion	<p>Verification during ASA1: Implementation was based on FFB Purchase procedure; Doc. # TSHR/PR/SOP03; Rev. # 1; Effective Date: 19/2/2018. Sample internal certified FFB received:</p> <ul style="list-style-type: none"> - Supplier: Landquest Estate; W/bridge ticket # 354257; Date: 4/4/2019; GRN # 354204; Nett weight: 11,670kg; Vehicle # SS6005P - Supplier: Maju Sawit Estate; W/bridge ticket # 354225; Date: 4/4/2019; GRN # 354172; Nett weight: 4,600kg; Vehicle # ST3863N <p>Sample external uncertified FFB received:</p> <ul style="list-style-type: none"> - Supplier: TSH Bukit Tajam Collecting Centre; W/bridge ticket # 345167; Date: 12/1/2019; GRN # 345114; Nett weight: 25,990kg; Vehicle # ST9637M - Supplier: TSH Bukit Tajam Collecting Centre; W/bridge ticket # 345698; Date: 17/1/2019; GRN # 345645; Nett weight: 18,350kg; Vehicle # SS9496J <p>Verification done during surveillance assessment found the evidence of corrective actions confirmed to be effective and no recurrence of issue. Hence, the Major NC remained closed.</p>

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1633205-201804-M4	Clause & Category (Major/Minor)	RSPO 5.13.2 Major SCCS
Closed (Yes/No)	Yes	Date of nonconformity closure	03/08/2018
Statement of Nonconformity	The discussion on the input during management review was not adequate.		
Requirement Reference	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 		
Objective Evidence	The management review was conducted on 28/2/2018 where the meeting was chaired by Group Executive Director. All the input was discussed accordingly during management review meeting except Results of internal audits covering RSPO Supply Chain Certification Standard and Customer feedback.		

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Corrective Action	To come out with standard meeting invitation of MRM, Presentation Slides and format of Minutes of Meeting to include both RSPO supply Chain and RSPO P&C agenda.- 19/5/2018
Assessment Conclusion	<p>Verification during ASA1:</p> <p>Notice of Management Review Meeting was issued by Asst. Manager/Sustainability HOD on 21/2/2019 to hold the meeting on 1/3/2019 at TSH HQ Tawau Meeting Room. Records of minutes of meeting shown meeting was attended by Group Executive Director, General Manager, AGM, Sustainability HOD, Estate Managers and QA. Agenda included the following (Para 13. Supply Chain and Traceability):</p> <ul style="list-style-type: none"> - Results of internal audit – no findings on SCCS - Customer feedback – no complaints received - Preventive and corrective – no issues - Follow up – no issues <p>Verification done during surveillance assessment found the evidence of corrective actions confirmed to be effective and no recurrence of issue. Hence, the Major NC remained closed</p>

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1633205-201804-M5	Clause & Category (Major/Minor)	Indicator 5.3.2 Major
Closed (Yes/No)	Yes	Date of nonconformity closure	03/08/2018
Statement of Nonconformity	The disposal of empty chemical container was not fully implemented		
Requirement Reference	All chemicals and their containers shall be disposed of responsibly.		
Objective Evidence	The disposal of empty container was not fully implemented since it was sighted that the waste was disposed at the landfill area. For example: Landquest Estate and LKSK Estate – found empty chemical containers		
Corrective Action	Improved awareness of waste management system at both estates through training, campaign and brochure dissemination. – 23/5/2018		
Assessment Conclusion	<p>Verification during ASA1:</p> <p>All the landfill for all the estates and mill were checked and confirmed that there was no disposal of empty chemical containers made at the landfill. The landfill was equipped with signage showing date of opening and closure c/w safety signage of the area.</p> <p>All empty containers on surplus units are disposed to an authorised <i>vendor M/s New Gates Industries (Borneo Sdn Bhd)</i>. The recent despatch from Landquest Estate being on 17/4/19 of 40 kg.</p> <p>Training on awareness were provided to the employees for compliance through subject on the following;</p> <ol style="list-style-type: none"> a) SW handlings /triple rinse/SW labelling b) Environmental WTP c) OSH Self inspection SOP d) EIA/ EAIA / Domestic waste e) Safe Chemical Handlings 		

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	Verification done during surveillance assessment found the evidence of corrective actions confirmed to be effective and no recurrence of issue. Hence, the Major NC remained closed
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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1633205-201804-M6	Clause & Category (Major/Minor)	Indicator 4.6.2 Major
Closed (Yes/No)	Yes	Date of nonconformity closure	03/08/2018
Statement of Nonconformity	The a.i/ha was not established.		
Requirement Reference	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided.		
Objective Evidence	Both the estates LKSK and Landquest has not established the utilization of pesticides a.i. / ha. The existing data only shows the formulation of chemicals as per the manufacturer's recommendations.		
Corrective Action	Revised the current format used to include the calculation of actual A.I/Ha application per annum – 17/5/2018 Train respective PIC on using this format and formula of calculations – 7/6/2018		
Assessment Conclusion	<p>Verification during ASA1: Details of actual a.i/ha of each pesticide applied in the field as required by this criterion had been sighted at all estates captured by month. It is broken down into immature and mature fields.</p> <p>Verification done during surveillance assessment found the evidence of corrective actions confirmed to be effective and no recurrence of issue. Hence, the Major NC remained closed</p>		

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1633205-201804-M7	Clause & Category (Major/Minor)	Indicator 4.7.4
Closed (Yes/No)	Yes	Date of nonconformity closure	03/08/2018
Statement of Nonconformity	There was no proper agenda discussed in the safety meeting.		
Requirement Reference	The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.		
Objective Evidence	<p>Both estates and the mill have not adequately provided specific agendas for discussion on issues concerning safety and health. There was no salient subjects i.e.</p> <p>a) Workplace inspection b) Accident and incident report .</p>		

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<p>Corrective Action</p>	<p>Standard of OSH Minutes of Meeting format to be provided to the respective OSH Committee secretary for each unit mill or estate- 19/5/2018 Train the OSH Committee Secretary on writing complete and complied Minutes of Meeting. KPOM - 28/5/2018 LKSK – 28/6/2018 LQ – 27/6/2018</p>																																				
<p>Assessment Conclusion</p>	<p>Verification during ASA1: The respective Mill and Estate Manager appoint an Executive (Assistant Manager, Field Conductor) of theirs as the person in charge for safety and environment. The PIC role covers areas of responsibilities on safety, health and welfare of the staff/workers. The Mill and Estates Managers in turn are appointed as the Chairman for the S&H committee. His duties among others is to preside the S&H meetings, discharge the General Duties of Employers and make decision arising out of issues discussed for improvement to Safety, Health, Welfare and the Environment. Members of the committee comprised of equal representatives from Management and Workers covering key work station or areas.</p> <p>The committee met quarterly as tabulated below. Viewing the minutes of meeting, issues discussed include employees’ safety, health and welfare, accident statistic, workplace inspection and action taken from previous workplace inspection report, legal compliance, safety and health training, etc.</p> <p>The minutes of meeting were sighted and verified. The dates of meetings held are recorded below.</p> <table border="1" data-bbox="491 1084 1289 1594"> <thead> <tr> <th colspan="4">Kunak Palm Oil Mill jointly held meeting with Maju Estate</th> </tr> </thead> <tbody> <tr> <td>Meeting No. 1</td> <td>27.08.2018</td> <td>Meeting No 3</td> <td>26.02.2019</td> </tr> <tr> <td>Meeting No 2</td> <td>26.11.2018</td> <td>Meeting No 4</td> <td>22.05.2019</td> </tr> <tr> <th colspan="4">Landquest Estate</th> </tr> <tr> <td>Meeting No. 1</td> <td>21.09.18</td> <td>Meeting No 3</td> <td>26.03.19</td> </tr> <tr> <td>Meeting No 2</td> <td>18.12.18</td> <td>Meeting No 4</td> <td>12.06.19</td> </tr> <tr> <th colspan="4">LKSK Estate</th> </tr> <tr> <td>Meeting No. 1</td> <td>19.09.18</td> <td>Meeting No 3</td> <td>21.03.19</td> </tr> <tr> <td>Meeting No 2</td> <td>18.12.18</td> <td>Meeting No 4</td> <td>13.06.19</td> </tr> </tbody> </table> <p>Verification done during surveillance assessment found the evidence of corrective actions confirmed to be effective and no recurrence of issue. Hence, the Major NC remained closed.</p>	Kunak Palm Oil Mill jointly held meeting with Maju Estate				Meeting No. 1	27.08.2018	Meeting No 3	26.02.2019	Meeting No 2	26.11.2018	Meeting No 4	22.05.2019	Landquest Estate				Meeting No. 1	21.09.18	Meeting No 3	26.03.19	Meeting No 2	18.12.18	Meeting No 4	12.06.19	LKSK Estate				Meeting No. 1	19.09.18	Meeting No 3	21.03.19	Meeting No 2	18.12.18	Meeting No 4	13.06.19
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Meeting No 2	18.12.18	Meeting No 4	13.06.19																																		

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1633205-201804-M8	Clause & Category (Major/Minor)	Indicator 6.1.1
Closed (Yes/No)	Yes	Date of nonconformity closure	03/08/2018

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Statement of Nonconformity	SIA was not conducted for Kunak POM.
Requirement Reference	A social impact assessment (SIA) including records of meetings shall be documented.
Objective Evidence	SIA was not conducted for Kunak POM.
Corrective Action	Ensure all report are correctly verify with all relevant units and properly indicated with signature & date of the verifier. – 22/6/2018
Assessment Conclusion	<p>Verification during ASA1: KPOM, Maju Sawit & Wakuba Estate: Established in the Social Impact Assessment (SIA) for Oil Palm Plantation of 251 Hectares at Maju Sawit Estate, Wakuba Estate and Kunak Palm Oil Mill, District of Tawau, Sabah; report prepared by Kiwiheng Environmental Consultants Sdn Bhd; Ref.: KEC-(EV)/18/03; Dated May 2018.</p> <p>Latest stakeholder meeting was done as following: i) External Stakeholder Meeting; Dated 11/4/2019; Venue: EPP Meeting Room. The meeting amongst all was attended by vendor/supplier/service provider as well as local communities among neighbouring estate representative, village head, school teacher and local authorities. ii) Internal Stakeholder Meeting; Dated 1/4/2019; Venue: KPOM. Other internal stakeholder meeting done including Gender meeting KPOM & Maju Sawit conducted on 9/4/2019 and Welfare Committee (Workers Representative) meeting on 24/4/2019.</p> <p>Landquest Estate: Established in the Social Impact Assessment (SIA) for Oil Palm Plantation of 437.5 Hectares at Landquest Estate on CL 125319244, District of Semporna, Sabah; report prepared by Kiwiheng Environmental Consultants Sdn Bhd; Ref.: KEC-(EV)/18/04; Dated January 2018.</p> <p>Latest stakeholder meeting was done as following: i) External Stakeholder Meeting; Dated 11/4/2019; Venue: EPP Meeting Room. The meeting amongst all was attended by vendor/supplier/service provider as well as local communities among neighbouring estate representative, village head, school teacher and local authorities. ii) Internal Stakeholder Meeting; Dated 1/4/2019; Venue: Landquest Estate. Other internal stakeholder meeting done including Gender meeting Landquest Estate conducted on 18/3/2019 and Welfare Committee (Workers Representative) meeting on 19/3/2019.</p> <p>LKSK Estate: Established in the Social Impact Assessment (SIA) for Oil Palm Plantation of 966 Hectares at LKSK Estate, District of Tawau, Sabah; report prepared by Kiwiheng Environmental Consultants Sdn Bhd; Ref.: KEC-(EV)/18/05; Dated January 2018.</p> <p>Verification done during surveillance assessment found the evidence of corrective actions confirmed to be effective and no recurrence of issue. Hence, the Major NC remained closed.</p>

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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1633205-201804-M9	Clause & Category (Major/Minor)	Indicator 6.1.2
Closed (Yes/No)	Yes	Date of nonconformity closure	03/08/2018
Statement of Nonconformity	SIA was not conducted for Kunak POM and therefore, no evidence of the assessment has been conducted with participation of affected parties.		
Requirement Reference	There shall be evidence that the assessment has been done with the participation of affected parties.		
Objective Evidence	SIA was not conducted for Kunak POM and therefore, no evidence of the assessment has been conducted with participation of affected parties.		
Corrective Action	Ensure all report are correctly verify with all relevant units and properly indicated with signature & date of the verifier- 22/6/2018		
Assessment Conclusion	<p>Verification during ASA1: Assessment confirmed has been done with participation of affected parties as per evidence sighted including the following:</p> <ul style="list-style-type: none"> - Minutes of Meeting; External Stakeholder Meeting; Date: 11/4/2019 - Kunak POM & Maju Sawit Estate Internal Stakeholder Meeting Year 2019; Date: 1/4/2019 - Landquest Sawit Estate Internal Stakeholder Meeting Year 2019; Date: 4/4/2019 <p>Verification done during surveillance assessment found the evidence of corrective actions confirmed to be effective and no recurrence of issue. Hence, the Major NC remained closed.</p>		

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1633205-201804-M10	Clause & Category (Major/Minor)	Indicator 6.1.3 Major
Closed (Yes/No)	Yes	Date of nonconformity closure	03/08/2018
Statement of Nonconformity	Negative issues raised during SIA were not incorporated into the Social Continual Improvement Plan.		
Requirement Reference	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.		
Objective Evidence	Some of the negative issues reported during the assessment by stakeholders were not incorporated into the continual improvement plan in LKSK Estate and Landquest Estate. For eg: The workers in LKSK Estate reported that the power supply was insufficient and inadequate. They requested the company to extend the operating hour of the power generator.		
Corrective Action	SIA Plan format to include both positive and negative issue. 22/6/2018		
Assessment Conclusion	<p>Verification during ASA1: Social management action plan established as Social Continual Improvement Plan; Rev. # 2; Date: 8/4/2019; Operating Unit: KPOM, Maju Sawit, Wakuba, LKSK & Landquest. Among programs established including the following:</p>		

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	<ul style="list-style-type: none"> - To ensure the work & pay conditions are achieve minimum stanrard of Labour Law: Jan-19 - "Rumah Merah" at LKSK Estate: Feb-18 - Bus stop at entrance of Landquest Estate: Apr-18 <p>Recreation areas along Sungai Ulu Kalumpang and Sungai Mantri at LKSK: Apr-18</p> <p>Verification done during surveillance assessment found the evidence of corrective actions confirmed to be effective and no recurrence of issue. Hence, the Major NC remained closed.</p>
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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1633205-201804-M11	Clause & Category (Major/Minor)	Indicator 2.1.1 Major
Closed (Yes/No)	Yes	Date of nonconformity closure	03/08/2018
Statement of Nonconformity	Kunak POM's management did not comply with the Sabah Labour Ordinance (Sabah Cap. 67).		
Requirement Reference	Evidence of compliance with relevant legal requirements shall be available.		
Objective Evidence	<p>Document reviewed on the payslips, check-roll, thumb print attendance record and interviewed with the workers in Kunak POM found that they are not paid and treated according to Sabah Labour Ordinance (Sabah Cap. 67) as below:</p> <p>a. Sampled of workers below found have worked more than 8 hours per day without paying overtime. For eg: 10 hours, 11 hours, 12 hours, 14 hours and 16 hours. (Clause 104 Subsection (1))</p> <p>b. Sampled of workers below found worked for 7 days per week without any one day of rest day per week. (Clause 104B Subsection 1))</p> <p>Sampled of workers as below:</p> <p>i. Employee No.: 03-0294</p> <p>ii. Employee No.: 01-0345</p> <p>iii. Employee No.: 05-0904</p>		
Corrective Action	<p>Revised the current contract agreement to clearly indicated on these requirement; 1/6/2018</p> <p>a. 1 Off Day /week</p> <p>b. Working hours per day 9 hour with 1 hour break time</p> <p>c. OT rate as per Sabah Labour Ordinance</p> <p>d. Pay rate calculation / methods.</p>		
Assessment Conclusion	<p>Verification during ASA1: Working hours is 8 hours. From Monday to Saturday. Total monthly working hours is 208 hours. The overtime maximum is 104 hours according to the Sabah Labour Ordinance 2005.</p> <p>As at current status, there was none has crossed 80 hours of overtime. Verified the payslips, the payment and calculation of overt time well distributed.</p> <p>The overtime rate after 8 hours daily rated is: upkeeping</p> <ul style="list-style-type: none"> - Mon - Sat – daily rated / 8 hours x 1.5 - Sunday - daily rated / 8 hours x 2.0 - Public holiday – daily rated / 8 hours x 3.0 <p>The overtime rate after 8 hours piece rated is: harvesters</p>		

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	<ul style="list-style-type: none"> - Mon - Sat – flat rate - Sunday – flat rate x 2.0 <p>Public holiday – flat rate x 3.0</p> <p>Based on sampled documentations available as per following: Mill sample sighted as following:</p> <ul style="list-style-type: none"> - Employee # 03-0050; Work station: Shovel Driver; Agreement date: 1/12/1997; Nationality: Indonesia - Employee # 01-0345; Work station: Weighbridge Clerk; Agreement date: 14/5/2007; Nationality: Indonesia - Employee # 05-0138; Work station: General Worker; Agreement date: 11/6/2000; Nationality: Indonesia - Employee # 03-0370; Work station: Clarification; Agreement date: 1/12/2007; Nationality: Indonesia - Employee # 05-0859; Work station: Security guard; Agreement date: 1/4/2014; Nationality: Malaysia <p>Maju Sawit Estate sample sighted as following:</p> <ul style="list-style-type: none"> - Employee # 01-0470; Work station: Harvester; Agreement date: 2/10/2015; Nationality: Indonesia - Employee # 01-0029; Work station: Harvester; Agreement date: 7/10/1998; Nationality: Indonesia - Employee # 01-0166; Work station: Watchman; Agreement date: 15/3/2003; Nationality: Indonesia - Employee # 01-0199; Work station: Weeder; Agreement date: 21/5/2004; Nationality: Indonesia <p>Landquest Estate sample sighted as following:</p> <ul style="list-style-type: none"> - Employee # 02-0619; Work station: Harvester; Agreement date: 13/11/2010; Nationality: Indonesia - Employee # 01-0675; Work station: Harvester; Agreement date: 1/9/2015; Nationality: Indonesia - Employee # 02-0744; Work station: Sprayer; Agreement date: 22/5/2017; Nationality: Indonesia - Employee # 02-0637; Work station: Sprayer; Agreement date: 18/4/2011; Nationality: Indonesia - Employee # 01-0562; Work station: Creche Ayah; Agreement date: 1/7/2009; Nationality: Indonesia <p>LKSK Estate sample sighted as following:</p> <ul style="list-style-type: none"> - Employee # 11-0813; Work station: Loose Fruit Collector; Agreement date: 11/9/2007; Nationality: Indonesia - Employee # 11-1602; Work station: Loose Fruit Collector; Agreement date: 9/8/2016; Nationality: Indonesia - Employee # 06-1606; Work station: Harvester; Agreement date: 2/1/2019; Nationality: Indonesia - Employee # 03-1304; Work station: Sprayer; Agreement date: 15/3/2018; Nationality: Indonesia - Employee # 02-1558; Work station: Harvester; Agreement date: 29/8/2017; Nationality: Indonesia - <p>Verification done during surveillance assessment found the evidence of corrective actions confirmed to be effective and no recurrence of issue. Hence, the Major NC remained closed.</p>
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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1633205-201804-N1	Clause & Category (Major/Minor)	Indicator 6.2.3 Minor
Closed (Yes/No)	Yes	Date of nonconformity closure	21/06/2019
Statement of Nonconformity	Stakeholder list for Landquest Estate and LKSK Estate was incomplete.		
Requirement Reference	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained.		
Objective Evidence	Stakeholder list was developed in Landquest Estate and LKSK Estate. However, the list was incomplete where government authorities and NGO was not included in the list.		
Corrective Action	Update the stakeholder list of relevant NGOs and authorities – 8/6/2018		
Assessment Conclusion	<p>Verification during ASA1: List of stakeholders maintained updated as per following:</p> <ul style="list-style-type: none"> - Internal Stakeholder List; Rev. # 0; Date: 9/4/2019 - External Stakeholder List; Rev. # 0; Effective date: 23/5/2019 - <p>Records of communication maintained as per procedure for Information Request; Doc. # TSHR/SUST/SOP01; Rev. # 2; Date: 1/11/2017. Recorded in Stakeholder Registration Form; From Student of SMK Balung on Information Request for Pentaksiran Tingkatan 3 (PT3) Tahun 2018; Kajian Lapangan Pelbagai Instrumen Sejarah (Letter Ref. # SMKBT/3053/400-07/04/01; Date: 20/4/2018) Borang Komplek & Keluh Kesah (Employee Grievance Report; Rev. # 0; Date: 1/4/2019); as per sample grievance on Utility Supervisor by Utility Operator; dated 29/5/2019 and received by AGM on 10/6/2019 – resolved within 1 week as per procedure with feedback to complainant shown acceptance by complainant confirming issue resolved.</p>		

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1633205-201804-N2	Clause & Category (Major/Minor)	Indicator 6.9.3 Minor
Closed (Yes/No)	Yes	Date of nonconformity closure	17/06/2019
Statement of Nonconformity	Meeting was not conducted as per the frequency stated in Communication & Consultation Procedure (TSHR/SUST/SOP02, Rev. 2) in Landquest Estate and LKSK Estate.		
Requirement Reference	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce.		
Objective Evidence	The last meeting was conducted on 20/12/2017 in Landquest Estate and 14/12/2017 in LKSK Estate. However, the meeting was not conducted as per the frequency stated in Communication & Consultation Procedure (TSHR/SUST/SOP02, Rev. 2) where the frequency was at least 3 months once in Landquest Estate and LKSK Estate.		

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Corrective Action	To conduct meeting for Q2'18. Both Welfare and Gender Annual Meeting plan and minutes of meeting will be submitted to RSPO Team for verification.
Assessment Conclusion	<p>Verification during ASA1: TSH has developed a Procedure for Sexual Harassment, TSHR/HR/SOP05; Rev. 0 as guidance for gender committee. Method of complaint is in place and the Form-Sexual Harassment Action Form.</p> <p>Sites were headed by Gender Committee representatives and supported by the respective management at sites. Committees were known as Women Committee and were supported by the TSH management.</p> <p>Latest gender committee meeting was done as following: i) Gender meeting KPOM & Maju Sawit conducted on 9/4/2019 ii) Gender meeting Landquest & LKSK Estate conducted on 18/3/2019 No negative issues were highlighted during the meetings. Proposals for women improvements were discussed for benefits of families, children immunisation and housing environment.</p> <p>Verification done during surveillance assessment found the evidence of corrective actions confirmed to be effective and no recurrence of issue. Hence, the Minor NC closed on 17/6/2019.</p>

Opportunity for Improvement	
OFI#	Description
OFI 1	Nil

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1633205-201804-M1	Major	SC 5.1.3	16/05/2018	Closed on 03/08/2018
1633205-201804-M2	Major	SC 5.3.2	16/05/2018	Closed on 03/08/2018
1633205-201804-M3	Major	SC 5.4.1	16/05/2018	Closed on 03/08/2018
1633205-201804-M4	Major	SC 5.13.2	16/05/2018	Closed on 03/08/2018
1633205-201804-M5	Major	5.3.2	16/05/2018	Closed on 03/08/2018
1633205-201804-M6	Major	4.6.2	16/05/2018	Closed on 03/08/2018
1633205-201804-M7	Major	4.7.4	16/05/2018	Closed on 03/08/2018
1633205-201804-M8	Major	6.1.1	16/05/2018	Closed on 03/08/2018
1633205-201804-M9	Major	6.1.2	16/05/2018	Closed on 03/08/2018
1633205-201804-M10	Major	6.1.3	16/05/2018	Closed on 03/08/2018
1633205-201804-M11	Major	2.1.1	16/05/2018	Closed on 03/08/2018
1633205-201804-N1	Minor	6.2.3	16/05/2018	Closed on 21/06/2019
1633205-201804-N2	Minor	6.9.3	16/05/2018	Closed on 17/06/2019
1788381-201904-N1	Minor	2.1.3	21/06/2019	"Open"
1788381-201904-N2	Minor	4.1.2	21/06/2019	"Open"

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1788381-201904-N3	Minor	4.6.10	21/06/2019	"Open"
1788381-201904-N4	Minor	6.5.3	21/06/2019	"Open"

3.5. Stakeholders Consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Kunak Palm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO 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 later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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 below.

List of Stakeholders Contacted	
<p>Internal Stakeholders</p> <p>Mill & Estate managers & asst. managers Supervisors, Staff & Clerks Mill local & foreign workers (process, workshop, etc.) Estate local & foreign workers (harvesters, sprayers, etc.) Local workers representatives Foreign workers representatives Gender committee representative Crèche minder</p>	<p>Union/Contractors/Local Communities</p> <p>Kampung Check-Point Smallholders Estate replanting contractor Estate suppliers Mill suppliers</p>
<p>Government Departments</p> <p>MPOB Tawau</p>	<p>NGO</p> <p>Nil</p>

IS #	Description
1	<p>Feedbacks: Replanting contractor: long- time relationship with company, no any issue with replanting contract price and payment. Good support by management on work done.</p>
	<p>Management Responses: Positive comments noted.</p>
	<p>Audit Team Findings: No further issue.</p>
2	<p>Feedbacks: Kampung Check-Point smallholders. Been supplying FFB to TSH mill on and off base on prices. No issue FFB supply dealing. Received info by the mill on the requirement of MSPO certification for smallholders.</p>
	<p>Management Responses:</p>

	Information related to both RSPO and MSPO requirements were shared with all consulted stakeholders during the stakeholder meeting.
	Audit Team Findings: No further issue.
3	Feedbacks: Supplier: no issue with TSH management. Has long business relationship for more than 5 years. Pity that the other plant (pulp & paper) not in operation since it looks very highly potential
	Management Responses: TSH top management has plans with existing pulp & paper facility. However, non-operational of the plant does not affect the plantation operation
	Audit Team Findings: No further issue.
4	Feedbacks: MPOB Tawau: no FFB quality issue by mill and estate within TSH. Mill comply with requirement to have MPOB competent FFB grader. Seek help from company to control on their collection centre FFB quality. Some have black bunch issues.
	Management Responses: Company always monitored FFB quality whether own of external. Penalty was given to supplier with non-compliance FFB quality.
	Audit Team Findings: Records shown grading done well to ensure OER achievement maintained at > 20%.
5	Feedbacks: Crèche minder: good crèche facilities provided by company. Sufficient minder to take care of children.
	Management Responses: Facilities provided to ensure workers children wellbeing.
	Audit Team Findings: No further issue.

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Formal Signing-off of Assessment Conclusion and Recommendation	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Kunak Palm Oil Mill has complied with the RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Kunak Palm Oil Mill Certification Unit is approved.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Hafriazhar Mohd Mokhtar	Name: Suhaimi Suwiti
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: TSH Plantation Management Sdn. Bhd.
Title: Lead auditor	Title: AGM
Signature: 	Signature: <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p> 
Date: 15/8/2019	Date: 22/8/2019

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance
Principle 1: Commitment to Transparency		
Criterion 1.1: Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSP0 Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
1.1.1	<p>There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSP0 Criteria to relevant stakeholders for effective participation in decision making.</p> <p>- Minor compliance -</p> <p>TSHR continued to use website for disseminating public information which are available in the company’s website http://www.tsh.com.my Information among others in relation to the following; land titles, safety and health plans, pollution prevention plans and procedure for complaints and grievances. The procedures for responding to any communication are described in TSHR/SUST/SOP01 dated 01/11/17. Therein detailing the following among others;</p> <ul style="list-style-type: none"> a) Transparency policy – signed by Managing Director 16/10/15. b) Information request c) Communication participation and consultation d) Human rights and responsible business <p>The flow chart of the procedure was made available on notice boards in the Estates and Mill offices/muster grounds. Both Estates/Mill continued to maintain stakeholders list for contractors, vendors/suppliers, government agencies, schools, local communities, etc. Records on requests for information and documents related to the Safety and Environment criteria were maintained accordingly. The CU also has established mechanism to channel queries through regular meetings with employees. Various issues and complaints were heard by the management and decisions made for subsequent action.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance																																																																								
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	<p>Records of requests for information and the CU's responses are filed and maintained at the respective estate/mill offices. Sighted the following records among others as follows</p> <table border="1"> <thead> <tr> <th colspan="4">KPOM</th> </tr> <tr> <th></th> <th>Date</th> <th>Details</th> <th>Inquirer</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>27/4/18</td> <td>Survey - social/sport activities</td> <td>SMK Balung</td> </tr> <tr> <td>2</td> <td>22/5/19</td> <td>Annual Inspection</td> <td>DOSH</td> </tr> <tr> <td>3</td> <td>18/2/19</td> <td>Information on accident claim</td> <td>SOCSCO</td> </tr> <tr> <td>4</td> <td>28/6/18</td> <td>Suppliers tools</td> <td>Wilmar</td> </tr> <tr> <td>5</td> <td>27/2/19</td> <td>Annual Inspection</td> <td>DOSH</td> </tr> <tr> <td>6</td> <td>2/12/18</td> <td>House repair</td> <td>M/s Azmi</td> </tr> <tr> <td>7</td> <td>20/12/18</td> <td>House repair</td> <td>M/s Mobin</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="4">Landquest Estate</th> </tr> <tr> <th></th> <th>Date</th> <th>Details</th> <th>Inquirer</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>21/5/18</td> <td>Survey of workers</td> <td>KKM</td> </tr> <tr> <td>2</td> <td>01/6/19</td> <td>Request for streetlight</td> <td>Workers</td> </tr> <tr> <td>3</td> <td>8/4/19</td> <td>OSHA audit</td> <td>DOSH</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="4">LKSK Estate</th> </tr> <tr> <th></th> <th>Date</th> <th>Details</th> <th>Inquirer</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>20/4/19</td> <td>House repair</td> <td>M/s Tamrin</td> </tr> <tr> <td>2</td> <td>20/4/19</td> <td>House repair</td> <td>M/s Rosni</td> </tr> </tbody> </table>	KPOM					Date	Details	Inquirer	1	27/4/18	Survey - social/sport activities	SMK Balung	2	22/5/19	Annual Inspection	DOSH	3	18/2/19	Information on accident claim	SOCSCO	4	28/6/18	Suppliers tools	Wilmar	5	27/2/19	Annual Inspection	DOSH	6	2/12/18	House repair	M/s Azmi	7	20/12/18	House repair	M/s Mobin	Landquest Estate					Date	Details	Inquirer	1	21/5/18	Survey of workers	KKM	2	01/6/19	Request for streetlight	Workers	3	8/4/19	OSHA audit	DOSH	LKSK Estate					Date	Details	Inquirer	1	20/4/19	House repair	M/s Tamrin	2	20/4/19	House repair	M/s Rosni	Complied
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Criterion / Indicator	Assessment Findings	Compliance
Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.		

<p>1.2.1</p>	<p>Publicly available documents shall include, but are not necessary limited to:</p> <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). <p>- Major compliance –</p>	<p>Copies of land use titles of all audited units were maintained and filed.</p> <p>The Occupational Health & Safety Plan titled 'Occupational Safety & Health Plan 2019' has been established. Indicators set in the plan are being monitored. Among others the management set the following plan;</p> <ul style="list-style-type: none"> a) Compliance to all LORR b) Continuous improvement of OSH performance c) Reduce significant risks to ESH / LTI <p>The Social Environmental Impact Assessment for the mill and estates was prepared by the QESH Department effective Jan 2018 individually for each OU for a period of 2015-2020. The action plan being updated annually.</p> <p>Plans and impact assessments relating to environmental and social impacts has been established. All details are compiled in the following documents;</p> <ul style="list-style-type: none"> a) Environmental Continual Improvement Plan 2015-2020 b) Environment Impact Assessment EIA Mitigation Plan c) Estate significant impact 2015-2020 <p>The HCV documentation is maintained and mentioned in criteria 5.2 inclusive in this report. Details as provided therein. The presence and type of HCV are also provided in each respective report.</p> <p>The list of waste/pollution generated from estate and mill activities are maintained. All sources of pollution have been identified in the <i>Environmental Continual Improvement Plan 2015-2020</i>. Mitigation measure and action taken also made available. Among of activities</p>	<p>Complied</p>
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		<p>covered include nursery, growing, drainage, planting, fertilizing, SW management and mill operation.</p> <p>Details of complaints can be written in the Complaints Book and to be resolved in accordance with the <i>Complaint & Grievances Resolution Procedure</i>. Information among others in relation to the following; land titles, safety and health plans, pollution prevention plans and procedure for complaints and grievances. The procedures for responding to any communication are described in TSHR/SUST/SOP01 dated 01/11/17. Therein describing the following among others Transparency Policy – signed by Managing Director 16/10/15.</p> <p>The continual improvement plans were available established. They were being maintained and updated with the assistance and guide personnel from QESH Department. This has been provided in Environmental Continual Improvement Plan 2015-2020. The estates had no major changes in the operation method. The mill had pain to install the ESP structure for the improvement of the dust emission revised by DOE from 0.40 g/NM3 to 0.15 g/NM3. A grace period of 5 years has been provided by the authorities for the mills to initiate effort for the compliance.</p> <p>The Public summary is available in RSPO website and http://www.tsh.com.my Details as provided therein.</p> <p>The policy states among other things, that the business is to be carried out with a sense of humanity, ensuring they are socially beneficial and do not infringe on basic human rights. This has been made available and translated in the following statement and policies</p> <ul style="list-style-type: none"> a) Freedom of association b) Equal opportunity & discrimination c) Reproductive rights 	
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Criterion / Indicator		Assessment Findings	Compliance
		d) Special labour policy.	
Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.			
1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. -Minor compliance	<p>TSH Management established policy on Communication & Consultation and the embedment of Code of Ethics within the Group Human Resource Manual and practice covers all operations in the plantation operation. Policies displayed on the notice board and communicated to employees.</p> <p>Elements of ethical conducts and integrity were imbedded in all policies reviewed at operations sites.</p> <ol style="list-style-type: none"> 1. Transparency Policy Statement 2. Safety & Health Policy Statement 3. Equal Opportunity & Discrimination Policy Statement 4. Freedom of Association Policy Statement 5. Sexual Harassment Policy Statement 6. Reproductive Rights Policy Statement 7. Child Labour Policy Statement 8. Environment Policy Statement 9. Human Rights Responsible Business Policy Statement 10. Special Labour Policy; 25/4/2018 11. Sustainability Policy: Strategy & Implementation; 5/9/2017 <p>Interview with employees reveal that they are aware of the policies.</p> <p>Human Rights & Responsible Business Policy; Doc. no.: TSHR/POL/SOP09 Rev. 0 dated 16/10/2015 signed by MD. Communicated through internal stakeholder meeting and assembly.</p>	Complied
Principle 2: Compliance with applicable laws and regulations			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			

<p>2.1.1</p>	<p>Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p>	<p>The Kunak Palm Oil Mill and estates visited continued to comply with applicable legal requirements it has identified. The list of legal requirements has been registered in Legal Document Master List and kept as hard copy and soft copy. The list was last reviewed by the Mill on 4.12.2019, Maju Sawit Estate on xx/yy/2019, Landquest Estate on aa/cc/2019 and LKSK Estate on 15/01/2019.</p> <p>Compliance to each applicable law and regulation is monitored by each operating unit and the sustainability team. The Certification Unit had obtained and renewed license and permits as required by the law.</p> <p>The licenses/permit viewed among others were:</p> <p>a) Kunak Palm Oil Mill</p> <ol style="list-style-type: none"> 1. MPOB licence no.: 500040104000 for processing 288,000 ton FFB valid from 1.4.2019 to 31.3.2020. 2. Energy commission license serial #006273/2018, installation #ST (SJB) P/S/JHR/00128 for 3400 kW valid until 10/08/2018. 3. Fire Certificate No.: 3030638, No. JBPM: JH/7/695/2018 valid from 29.10.2018 – 28.10.2019 4. SPAN Water Services Industry (Licencing) Regulation 2007, No.: SPAN/JKSP/PT/800-4(2)/9/09 valid from 31.5.2018 – 30.5.2019 5. River water extraction (BAKAJ) license no.: 08/A/KLG/055 (validity period until 31/12/2018) by Director of Water Resources Johor for usage quantity of 1700m3/day 6. Diesel license ref #BPGK/JH (KLU)0273 SK for 18,000 liter dated 28/02/2019 until 27/02/2020. 7. Firearms Licence, Serial no.:231937, KLG/A/1677 registered in the name of Mill Manager, valid from 4.6.2018 – 3.6.2019. <p><u>Competence persons:</u></p>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> a. FFB Grader: 1x serial no. MPOB-KKMBS-SE-70-2017 b. Steam engineer: 1 x 2nd Grade: Cert. No. 155/2006 c. Steam engine and Boilerman certificate: 1st Grade – 2 Nos., (Cert. No.: H/ED/29/07 and SB/12/EIS/01/10 x 1 and 2nd Grade – 3 Nos. (Cert. No.: H/ED/204/92, SB/15/EIS/02/34 and SB/15/EIS/02/62). d. Internal Combustion Engine Driver, 2nd Grade – Nos. Cert. No. SB/14/EIS/02/52. e. Electrical charge man: 1x A1, Cert. No.: PJ-T-2-B-0365-2008 f. AESP 4 Nos. (Cert. no.: NW-NSBH-AE-0978-N, NW-NSDK-AE-R-0386-N, NW-NSBH-AE-0408-O and NW-NSBH-AE-R-0419-P valid until 17/08/2019, 21/08/2019, 02/07/2020 and 27/02/2021 respectively. g. AGT 2 Nos. (Cert. No.: HQ/19/AGTES/01/03472) valid until 19/03/2022 and (HQ/19/AGTES/01/03565 valid until 10/04/2022. h. CePSWaM – 1 Nos. Cert. No.: CePSWaM/185339 expired 15/11/2019. i. CePPOME - 1 Nos. Cert. No.: CEPPOME /16006 expired May 2019 	
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	Written information for Legal and other requirements, Document No TSHR/SUST/SOP04 Rev No 2. dated 01.11.2017 was available and maintained. It includes procedure for tracking changes, implementation of changes and evaluation of compliance. The tracking of the changes to legal requirements are conducted by the respective HOD (4 departments). The Legal Master List was last was evaluated from 11 th – 13 th February 2019 for mill and estates assessed.	Complied

<p>2.1.3</p>	<p>A mechanism for ensuring compliance shall be implemented. - Minor compliance -</p>	<p>The mechanism used to ensure compliance include assigning responsibility to Group Executive Director, General Manager, Operating Unit Division Manager, the respective Mill and Estate Manager, QESH/Sustainability HOD, PIC Environmental, PIC Safety and PIC Social at each operation site.</p> <p>All Estates and Mill maintain documented system for identifying, evaluating, reviewing and updating applicable regulations and other requirements. The legal register at all sites were updated on yearly basis / as and when needed for new updates or renewal of licenses. Details of implementation of regulations are recorded under evaluation of legal compliance audit, TSHR/SUST/F04 dated 11th – 13th February 2019.</p> <p>The Certification Unit also assigned specific individual from Sustainability Department to ensure their Legal and Other Requirement Register (LORR) at each Operating Unit are up to date and to assist in evaluation of compliance.</p> <p>The PIC for LORR are as follows:</p> <table border="1" data-bbox="1028 1038 1711 1307"> <thead> <tr> <th>Operating Unit</th> <th>PIC</th> <th>Last changes*</th> </tr> </thead> <tbody> <tr> <td>Kunak POM</td> <td>Anwar Alimudddin B</td> <td>15.01.2019</td> </tr> <tr> <td>Maju Sawit Estate</td> <td>Anwar Alimudddin B</td> <td>15.01.2019</td> </tr> <tr> <td>Landquest Estate</td> <td>Mohd Azman Mabaloh</td> <td>15.01.2019</td> </tr> <tr> <td>LKSK</td> <td>Mohd Ali B Salaman</td> <td>15.01.2019</td> </tr> </tbody> </table> <p>*includes Updating Minimum Wage Order 2018</p>	Operating Unit	PIC	Last changes*	Kunak POM	Anwar Alimudddin B	15.01.2019	Maju Sawit Estate	Anwar Alimudddin B	15.01.2019	Landquest Estate	Mohd Azman Mabaloh	15.01.2019	LKSK	Mohd Ali B Salaman	15.01.2019	<p>Minor nonconformance</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<p>Despite the mechanism to ensure compliance lapses at Maju Sawit, Landquest Estate to conform to Occupational Safety and Health_– Classification, Labelling and Safety Data Sheet of Hazardous Chemicals) Regulations 2013 was sighted. Thus a minor noncompliance was raised.</p> <p>The Safety and Data Sheets for Agrochemicals, Lubricant and Hydraulic oil found at the Agrochemicals store and Workshop did not have their valid SDS displayed. It is more than 5 years old.</p>	
2.1.4	<p>A system for tracking any changes in the law shall be implemented.</p> <p>- Minor compliance -</p>	<p>latest Minimum Wage Order 2018. HR was informed by <i>Jabatan Tenaga Kerja</i> and HR subsequently distribute and update the respective Operating Unit.</p>	Complied
<p>Criterion 2.2: The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.</p>			

<p>2.2.1</p>	<p>Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -</p>	<p>Land title documents sighted available as following: Maju Sawit Estate (including Wakuba division):</p> <ul style="list-style-type: none"> - Title no. Country Lease 105392989; Register memo no.: 30350966(15); dated 21/5/2002. Legal use condition: Cultivation of Oil Palm & Cocoa - Title no. Country Lease 105392998; Register memo no.: 30350965(15); dated 21/5/2002. Legal use condition: Cultivation of Oil Palm & Cocoa - Quit rent payment for year 2018; Cheque # 518360; Date: 17/5/2018 - Title no. Country Lease 105348954; Register memo no.: 30295792; dated 20/6/2002. Legal use condition: Cocoa, Coconut & Oil Palm - Title no. Country Lease 105351040; Register memo no.: 30295792; dated 20/6/2002. Legal use condition: Cocoa, Coconut & Oil Palm - Title no. Country Lease 105348945; Register memo no.: 30295792; dated 20/6/2002. Legal use condition: Cocoa, Coconut & Oil Palm <p>Landquest Estate:</p> <ul style="list-style-type: none"> - Title no. Country Lease 125319244; Register memo no.: 30282019(17); dated 20/7/2000. Legal use condition: Cultivation of Cocoa and/or Agricultural Crop of Economic Value - Quit rent payment for 2018; Sabah State Government Receipt # 10201805000626; Date: 21/5/2018 - 2019 payment cheque # DD559384; Date: 14/5/2019 <p>LKSK Estate:</p> <ul style="list-style-type: none"> - Title no. Country Lease 105365955; Register memo no.: 30240302(04); dated 29/6/1994. Legal use condition: Cultivation of Cocoa-Application letter made to Sabah Lands and Surveys 	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance																												
		Department Cawangan Tawau; Date: 17/5/2018 to "Request of Tambah Syarat (Pertanian) to Cultivation of Cocoa and/or Palm Oil and/or Coconut and/or Agricultural Crop of Economic Value" - Quit rent payment for 2018; Sabah State Government Receipt # 10201805000625; Date: 21/5/2018 - 2019 payment cheque # DD559385; Date: 4/6/2019																													
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	Boundary markers/stones were available and shown at the boundary areas of the estates along with the neighboring areas/estates. The visited sites were visited and verified. <table border="1" data-bbox="1025 719 1787 1118"> <thead> <tr> <th></th> <th>Estate /Mill</th> <th>Field no</th> <th>Neighboring areas</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>KPOM</td> <td>Mill fencing</td> <td>Mill fencing on the host estate–Maju Sawit</td> </tr> <tr> <td>2</td> <td>Maju Sawit</td> <td>P98E</td> <td>Forest Reserve</td> </tr> <tr> <td></td> <td></td> <td>Stone no 251/685</td> <td>Forest Reserve</td> </tr> <tr> <td>3</td> <td>LKSK</td> <td>P98</td> <td>Forest Reserve</td> </tr> <tr> <td>4</td> <td>Landquest</td> <td>Stone no 267/435</td> <td>KLK – Pinang Estate</td> </tr> <tr> <td></td> <td></td> <td>PR2019A</td> <td>Long Heng - Smallholder</td> </tr> </tbody> </table>		Estate /Mill	Field no	Neighboring areas	1	KPOM	Mill fencing	Mill fencing on the host estate–Maju Sawit	2	Maju Sawit	P98E	Forest Reserve			Stone no 251/685	Forest Reserve	3	LKSK	P98	Forest Reserve	4	Landquest	Stone no 267/435	KLK – Pinang Estate			PR2019A	Long Heng - Smallholder	Complied
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2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	Review on land ownership records and interview with relevant stakeholders confirmed there are no conflict or dispute over the land within legal boundary of TSH Kunak POM and estates.	Complied																												

Criterion / Indicator		Assessment Findings	Compliance
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	There is no land dispute within TSH Kunak POM and estates at the time of audit. The land belongs to TSH and land ownership documents verified.	Complied
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	There is no land dispute within TSH Kunak POM and estates at the time of audit. The land belongs to TSH and land ownership documents verified.	Complied
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	There is no land dispute within TSH Kunak POM and estates at the time of audit. The land belongs to TSH and land ownership documents verified.	Complied
Criterion 2.3:			
Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.			
2.3.1	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance -	There is no land dispute within TSH Kunak POM and estates at the time of audit. The land belongs to TSH and land ownership documents verified.	Complied

Criterion / Indicator	Assessment Findings	Compliance
2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. - Minor compliance -	Complied
2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	Complied
2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	Complied
Principle 3: Commitment to long-term economic and financial viability		

Criterion / Indicator	Assessment Findings	Compliance
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.		

Criterion / Indicator	Assessment Findings	Compliance
<p>3.1.1</p> <p>A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders.</p> <p>- Major compliance -</p>	<p>Annual Business management plan was sighted available for period January 2019 to December 2021 at all operating units of KPOM Certification Unit. This 3-year projection was prepared as guidance for future planning in document entitled, Long-term Project Development and Maintenance (3 year).</p> <p>In it items description (main headings) is set out as follows with costs budgeted / projected for the current year and the subsequent 2 years. Excerpt from the mill is as follows:</p> <ul style="list-style-type: none"> A. Fixed Asset <ul style="list-style-type: none"> 1. Building 2. Plant & machinery 3. Tools & Equipment 4. Office Equipment 5. Furniture & Fittings B1. Staff Salary & Related Costs B2. Labour Welfare Expenses B3. Administration & General Charges B4. Depreciation B5. Manufacturing Costs <p>At the estate the format of the Plan is generally the same as in the mill except the Manufacturing Cost is replaced with Palm: Mature – Upkeep & maintenance, Harvesting & Collection and Year of planting, age categories FFB Projection (Mt) and its corresponding Area Projections (Ha)</p> <p>KPOM and its supply bases have made progress towards achieving their performance production targets for the current financial year.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance																																			
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	<p>All the 4 estates had established a replanting program spanned over a 5 year period till 2024. All programs were sighted with details extracted as follows;</p> <table border="1"> <thead> <tr> <th>F Year</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> </tr> </thead> <tbody> <tr> <td>Maju Sawit</td> <td>17</td> <td>15</td> <td>15</td> <td>16</td> <td>16</td> <td>16</td> </tr> <tr> <td>LKSK</td> <td>100</td> <td>66</td> <td>100</td> <td>100</td> <td>100</td> <td>166</td> </tr> <tr> <td>Land quest</td> <td>41</td> <td>0</td> <td>35</td> <td>16</td> <td>35</td> <td>0</td> </tr> <tr> <td>Wakuba</td> <td>0</td> <td>0</td> <td>0</td> <td>12</td> <td>0</td> <td>0</td> </tr> </tbody> </table> <p>Sizes of fields identified for replanting varies subject to factors i.e. hilly, yield etc. All replanting program and planning in all the Group Estates are monitored by Head Office level for further approval from the Group Executive Director's office. Agronomist assistance and audit by the Head Office personnel are made at frequency of minimum x/year.</p>	F Year	2019	2020	2021	2022	2023	2024	Maju Sawit	17	15	15	16	16	16	LKSK	100	66	100	100	100	166	Land quest	41	0	35	16	35	0	Wakuba	0	0	0	12	0	0	Complied
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<p>Principle 4: Use of appropriate best practices by growers and millers</p> <p>Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.</p>																																						

<p>4.1.1</p>	<p>Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -</p>	<p>Both the estates and the mill had documented Standard Operating Procedures as a guidance for the day-to day operation. There are three 3 types/levels of documents adopted by the estates ;</p> <ul style="list-style-type: none"> a) Pest And Diseases Management (established in Oct 2009) b) Standard Operating Procedures (SOP). <i>TSHP/OPE/SOP 01-10</i> It covers the following work operations i.e. <ul style="list-style-type: none"> - Land clearing and preparation - Nursery/Cover crop - Planting & supplies / in filling - Weeding / Pruning & sanitation - FFB harvesting & dispatch - Fertilizer application - Ablation / replanting c) Work Instruction (WI) <i>TSHP/OPE/W0101-W103</i> <ul style="list-style-type: none"> - <i>Kerbau Mekanikal</i> (applicable in LKSK estate) - <i>Pengumpulan Biji Lerai</i> - <i>Penandaan Batu Sempadan</i> <p>Similarly the mill adopted a similar system of documentation as shown below;</p> <ul style="list-style-type: none"> a) Kunak POM SOP <i>ref no TSHPOM/ML/SOP1-18</i> effective 05/10/17 for all processing stations. <ul style="list-style-type: none"> - Reception / sterilisation / threshing - Pressing /clarification / kernel plant - Boiler / engine room - Effluent treatment plant - Water treatment / belt press station b) Work Instruction (WI) (<i>last reviewed on 26/9/2016</i>) c) Occupational Safety & Health Handbook For Palm Oil Mill (<i>last reviewed on 04/7/2016</i>) <p>All the mentioned documents were sighted and verified.</p>	<p>Complied</p>
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<p>4.1.2</p>	<p>A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -</p>	<p>All the audited estates had in place a mechanism to check consistent implementation of procedures. The estates monitored the good agricultural practices as per SOPs through on-site supervision, visits, inspections and discussions with relevant personnel. The estates Supervisors and Executives maintained the following document among others to monitor the estates daily operations;</p> <ul style="list-style-type: none"> a) Harvesting assessment record b) Circle and path assessment record c) Fertilizer application assessment record. d) Daily FFB production record – actual vs budget <p>There were also assessments and audits such as;</p> <ul style="list-style-type: none"> a) Field audits 6x /year b) PA visits and Agronomist performed once a year. <table border="1" data-bbox="1032 847 1395 948"> <thead> <tr> <th></th> <th>Estate</th> <th>PA visit</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Landquest</td> <td>29/6/18</td> </tr> <tr> <td>2</td> <td>LKSK</td> <td>28/6/18</td> </tr> </tbody> </table> <p>Random interview with the estate workers showed that they understood the requirement stated in the SOPs. During the site visit (LKSK OP 98E, OP98A, /Landquest (OP 19A & OP96C) /Sawit Maju OP98B) it was observed that harvesting standards and spraying procedure had been properly understood by the interviewed harvesters and workers respectively</p> <p>Similarly the mill adopted the following records for the day-to-day production among others</p> <ul style="list-style-type: none"> a) Monitoring sheet (Process station data/parameters/commentaries) b) Laboratory results c) Production report FFB receipt/CPO/CPK despatches 		Estate	PA visit	1	Landquest	29/6/18	2	LKSK	28/6/18	<p>Minor nonconformance</p>
	Estate	PA visit										
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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> d) Security report / Manpower report e) Total usage of power f) Monthly accounts / Annual report <p>There were also external assessments/checks by the Head Office personnel among others the following visits.</p> <ul style="list-style-type: none"> g) Process audit – EPP h) Accounts Dept audit <p>During the site visit to <i>Maju Sawit Estate PR field 2019</i> the palm circles and creepers has not been maintained. Field conditions were grassy and with spraying delayed. The field condition has not been satisfactorily maintained as per the SOP hence, a minor NC has been raised on the matter.</p>	
4.1.3	<p>Records of monitoring and any actions taken shall be maintained and available, as appropriate.</p> <p>- Minor compliance -</p>	<p>Records of monitoring and the actions taken by both estates were maintained and kept for a minimum of 12 months. Monthly Costing and Annual Reports on monitoring of all activities were made available. Among those records sighted at the estates</p> <ul style="list-style-type: none"> a) Harvesting assessment record b) Circle and path assessment record c) Fertilizer application assessment record. d) Daily FFB record – actual vs budget <p>Inclusive are also Work Program Sheets, Bin cards, Monthly Progress & Report Account, rainfall data, rat damage census, etc. Records on FFB quality control for individual harvesters, the action taken on them and corrective action records were sighted. Harvesting rounds were monitored using harvesting interval records</p>	Complied
4.1.4	<p>The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB).</p> <p>- Major compliance -</p>	<p>The mill recorded the origins of all FFB including own and external source of FFB supply totalling up to 434 suppliers as per External Stakeholder Contact Details; Rev. # 0; Effective date: 23/5/2019.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.		

<p>4.2.1</p>	<p>There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -</p>	<p>Fertiliser application for the estates is made through recommendation by the Agronomist. The recommendation was based on annual leaf analysis. The estates, soil fertility was maintained as per the SOPs through the management been managed by recycling of biomass like frond stacking, water management in low lying areas, maintenance of soft weeds, leguminous cover crops, and <i>nephrolepis biserrata</i> in the interline and terrace areas.</p> <p>Available for the estates operation information are also the soil analysis latest made in 2016/17. This is a 5 year cycle analysis. The analysis was made by an independent lab owned by "Borneo Samudra Sdn Bhd"</p> <table border="1" data-bbox="1032 815 1688 1150"> <thead> <tr> <th colspan="8">LKSK Estate (Sept 2017)</th> </tr> <tr> <th>ref</th> <th>Depth</th> <th>pH</th> <th>N</th> <th>C</th> <th>K</th> <th>Ca</th> <th>Mg</th> </tr> </thead> <tbody> <tr> <td rowspan="2">1521</td> <td rowspan="2">Top</td> <td>4.</td> <td>0.1</td> <td>0.3</td> <td>3.6</td> <td>9.07</td> <td>2.50</td> </tr> <tr> <td>4</td> <td>2</td> <td>2</td> <td>6</td> <td></td> <td></td> </tr> <tr> <td rowspan="2">1522</td> <td rowspan="2">Botto m</td> <td>4.</td> <td>0.1</td> <td>0.3</td> <td>2.3</td> <td>7.04</td> <td>1.65</td> </tr> <tr> <td>5</td> <td>2</td> <td>9</td> <td>2</td> <td></td> <td></td> </tr> <tr> <td rowspan="2">1523</td> <td rowspan="2">Top</td> <td>5.</td> <td>0.1</td> <td>0.4</td> <td>0.6</td> <td>9.44</td> <td>1.88</td> </tr> <tr> <td>0</td> <td>2</td> <td>5</td> <td>6</td> <td></td> <td></td> </tr> <tr> <td rowspan="2">1524</td> <td rowspan="2">bottom</td> <td>4.</td> <td>0.1</td> <td>0.3</td> <td>0.3</td> <td>8.98</td> <td>2.03</td> </tr> <tr> <td>8</td> <td>2</td> <td>9</td> <td>9</td> <td></td> <td></td> </tr> </tbody> </table> <table border="1" data-bbox="1032 1182 1688 1378"> <thead> <tr> <th colspan="8">Maju Sawit Estate (Oct 2017)</th> </tr> <tr> <th>ref</th> <th>Depth</th> <th>pH</th> <th>N</th> <th>C</th> <th>K</th> <th>Ca</th> <th>Mg</th> </tr> </thead> <tbody> <tr> <td rowspan="2">1525</td> <td rowspan="2">Top</td> <td>4.</td> <td>0.1</td> <td>0.6</td> <td>0.8</td> <td>3.23</td> <td>0.47</td> </tr> <tr> <td>5</td> <td>4</td> <td>5</td> <td>3</td> <td></td> <td></td> </tr> <tr> <td rowspan="2">1526</td> <td rowspan="2">Botto m</td> <td>4.</td> <td>0.0</td> <td>0.2</td> <td>0.8</td> <td>1.73</td> <td>0.60</td> </tr> <tr> <td>3</td> <td>9</td> <td>6</td> <td>9</td> <td></td> <td></td> </tr> </tbody> </table>	LKSK Estate (Sept 2017)								ref	Depth	pH	N	C	K	Ca	Mg	1521	Top	4.	0.1	0.3	3.6	9.07	2.50	4	2	2	6			1522	Botto m	4.	0.1	0.3	2.3	7.04	1.65	5	2	9	2			1523	Top	5.	0.1	0.4	0.6	9.44	1.88	0	2	5	6			1524	bottom	4.	0.1	0.3	0.3	8.98	2.03	8	2	9	9			Maju Sawit Estate (Oct 2017)								ref	Depth	pH	N	C	K	Ca	Mg	1525	Top	4.	0.1	0.6	0.8	3.23	0.47	5	4	5	3			1526	Botto m	4.	0.0	0.2	0.8	1.73	0.60	3	9	6	9			<p>Complied</p>
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1525	Top	4.	0.1	0.6	0.8	3.23	0.47																																																																																																																
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1526	Botto m	4.	0.0	0.2	0.8	1.73	0.60																																																																																																																
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**RSPO Public Summary Report
Revision 8 (Mar /2019)**

Criterion / Indicator		Assessment Findings								Compliance
		1527	Top	4.5	0.14	0.33	0.95	3.15	0.64	
		1528	bottom	4.3	0.11	0.82	1.06	2.97	1.06	
		Landquest Estate (Aug 2016)								
		ref	Depth	pH	N	C	K	Ca	Mg	
		3056	Top	5.1	0.11	0.54	1.53	4.10	1.44	
		3057	Bottom	4.6	0.09	0.39	1.04	3.20	1.12	
		3058	Top	4.4	0.10	0.59	0.64	1.57	0.52	
		3059	bottom	4.4	0.10	0.41	0.71	1.74	0.67	

<p>4.2.2</p>	<p>Records of fertiliser inputs shall be maintained. - Minor compliance -</p>	<p>Records of programs and applications of fertilisers were maintained and adopted for operation monitoring by all the estates. The fertilisers applied in the estates are; <i>SOA(Ammonium Sulphate) / MOP / MRP / Kieserite / GML / Borate.</i> The rate of application as per the Agronomist recommendations as sampled are shown below;</p> <table border="1" data-bbox="1032 587 1805 823"> <thead> <tr> <th colspan="6">Maju Sawit Estate</th> </tr> <tr> <th></th> <th>Fertiliser</th> <th>Program</th> <th>Field No</th> <th>Ha</th> <th>Dosage/palm</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>SOA</td> <td>Jan</td> <td>98B</td> <td>34.5</td> <td>0.80</td> </tr> <tr> <td>2</td> <td>MOP</td> <td>April</td> <td>98B</td> <td>34.5</td> <td>1.10</td> </tr> <tr> <td>3</td> <td>ERP</td> <td>July</td> <td>98B</td> <td>34.5</td> <td>0.40</td> </tr> <tr> <td>4</td> <td>SOA</td> <td>Jan</td> <td>98C</td> <td>6.0</td> <td>1.50</td> </tr> </tbody> </table> <table border="1" data-bbox="1032 855 1805 1091"> <thead> <tr> <th colspan="6">Landquest Estate</th> </tr> <tr> <th></th> <th>Fertiliser</th> <th>Program</th> <th>Field No</th> <th>Ha</th> <th>Dosage/palm</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>SOA</td> <td>Jan</td> <td>97</td> <td>35</td> <td>1.50</td> </tr> <tr> <td>2</td> <td>MOP</td> <td>April</td> <td>96</td> <td>35</td> <td>1.10</td> </tr> <tr> <td>3</td> <td>PRP</td> <td>July</td> <td>97</td> <td>16</td> <td>1.00</td> </tr> <tr> <td>4</td> <td>SOA</td> <td>July</td> <td>2000</td> <td>23</td> <td>1.60</td> </tr> </tbody> </table> <table border="1" data-bbox="1032 1123 1805 1359"> <thead> <tr> <th colspan="6">LKSK Estate</th> </tr> <tr> <th></th> <th>Fertiliser</th> <th>Program</th> <th>Field No</th> <th>Ha</th> <th>Dosage/palm</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>SOA</td> <td>Jan</td> <td>98A</td> <td>56</td> <td>1.40</td> </tr> <tr> <td>2</td> <td>MOP</td> <td>Jan</td> <td>98B</td> <td>53</td> <td>0.40</td> </tr> <tr> <td>3</td> <td>PRP</td> <td>April</td> <td>99G</td> <td>55</td> <td>1.00</td> </tr> <tr> <td>4</td> <td>SOA</td> <td>Jan</td> <td>98C</td> <td>57</td> <td>1.40</td> </tr> </tbody> </table>	Maju Sawit Estate							Fertiliser	Program	Field No	Ha	Dosage/palm	1	SOA	Jan	98B	34.5	0.80	2	MOP	April	98B	34.5	1.10	3	ERP	July	98B	34.5	0.40	4	SOA	Jan	98C	6.0	1.50	Landquest Estate							Fertiliser	Program	Field No	Ha	Dosage/palm	1	SOA	Jan	97	35	1.50	2	MOP	April	96	35	1.10	3	PRP	July	97	16	1.00	4	SOA	July	2000	23	1.60	LKSK Estate							Fertiliser	Program	Field No	Ha	Dosage/palm	1	SOA	Jan	98A	56	1.40	2	MOP	Jan	98B	53	0.40	3	PRP	April	99G	55	1.00	4	SOA	Jan	98C	57	1.40	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>Records of application were maintained. The methodology used is to repack into the dosage intended packing e.g. 1.5 kg from the 50 kg bags. All applied palm are displayed with the empty plastic small bags to indicate that the palm has been applied with fertiliser. Empty bags were thereafter reconciled and recorded.</p>	

Criterion / Indicator	Assessment Findings	Compliance																																																																																								
<p>4.2.3</p> <p>There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -</p>	<p>The agronomist performed the periodic foliar and soil sampling to monitor changes in nutrient status. The results of foliar sampling carried out in 2018 for the estates were sampled with details given below;</p> <table border="1" data-bbox="1032 555 1767 695"> <thead> <tr> <th colspan="8">Landquest Estate (Sept 2018)</th> </tr> <tr> <th>Sample ref.</th> <th>Ash</th> <th>N</th> <th>P</th> <th>K</th> <th>Ca</th> <th>Mg</th> <th>B</th> </tr> </thead> <tbody> <tr> <td>6579</td> <td>15.0</td> <td>2.54</td> <td>0.14</td> <td>0.83</td> <td>0.79</td> <td>0.19</td> <td>10</td> </tr> </tbody> </table> <table border="1" data-bbox="1032 727 1767 935"> <thead> <tr> <th colspan="8">Maju Sawit Estate (July 2018)</th> </tr> <tr> <th>Sample ref.</th> <th>Ash</th> <th>N</th> <th>P</th> <th>K</th> <th>Ca</th> <th>Mg</th> <th>B</th> </tr> </thead> <tbody> <tr> <td>5702</td> <td>10.6</td> <td>2.75</td> <td>0.16</td> <td>0.84</td> <td>0.57</td> <td>0.23</td> <td>17</td> </tr> <tr> <td>5189</td> <td>0.1</td> <td>2.59</td> <td>0.15</td> <td>0.82</td> <td>0.50</td> <td>0.22</td> <td>19</td> </tr> </tbody> </table> <table border="1" data-bbox="1032 967 1767 1174"> <thead> <tr> <th colspan="8">LKSK Estate (Sept 2018)</th> </tr> <tr> <th>Sample ref.</th> <th>Ash</th> <th>N</th> <th>P</th> <th>K</th> <th>Ca</th> <th>Mg</th> <th>B</th> </tr> </thead> <tbody> <tr> <td>6418</td> <td>8.50</td> <td>2.70</td> <td>0.16</td> <td>0.84</td> <td>0.54</td> <td>0.22</td> <td>13</td> </tr> <tr> <td>6424</td> <td>9.81</td> <td>2.61</td> <td>0.16</td> <td>0.85</td> <td>0.53</td> <td>0.20</td> <td>13</td> </tr> </tbody> </table> <p>Upon obtaining the foliar results the fertiliser type and dosage will be determined. Thereafter the management will place the fertiliser order and set the application program.</p>	Landquest Estate (Sept 2018)								Sample ref.	Ash	N	P	K	Ca	Mg	B	6579	15.0	2.54	0.14	0.83	0.79	0.19	10	Maju Sawit Estate (July 2018)								Sample ref.	Ash	N	P	K	Ca	Mg	B	5702	10.6	2.75	0.16	0.84	0.57	0.23	17	5189	0.1	2.59	0.15	0.82	0.50	0.22	19	LKSK Estate (Sept 2018)								Sample ref.	Ash	N	P	K	Ca	Mg	B	6418	8.50	2.70	0.16	0.84	0.54	0.22	13	6424	9.81	2.61	0.16	0.85	0.53	0.20	13	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -	All the estates had a nutrient recycling strategy in place. a) Palm fronds were stacked in the fields and left to decompose. b) There was no EFB applied in the fields as the entire stocks are processed in the power generation plant to produce electricity. c) There was no POME applied in other estates due to the distance from the mill. <i>Maju Sawit Estate</i> received the treated effluent using method of land application P98B.	Complied
Criterion 4.3: Practices minimise and control erosion and degradation of soils.			

Criterion / Indicator		Assessment Findings	Compliance																		
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	<p>There was no fragile/marginal soil at all three estates as sighted in their soil maps. The following soil series were present instead.</p> <table border="1"> <thead> <tr> <th>Maju Sawit</th> <th>LKSK</th> <th>Landquest</th> </tr> </thead> <tbody> <tr> <td>Brantian Alluvium</td> <td>Brantian Alluvium</td> <td>Kinabatangan Alluvium</td> </tr> <tr> <td>Kinabatangan Alluvium</td> <td>Apas/intermediate & acid igneous rocks</td> <td>Apas/intermediate & acid igneous rocks</td> </tr> <tr> <td>Sipit/Mudstone, sandstone & miscellaneous rocks</td> <td>Tinagat/intermediate & acid igneous rocks</td> <td>Tinagat/intermediate & acid igneous rocks</td> </tr> <tr> <td>Apas/intermediate & acid igneous rocks</td> <td>Wullerdorf/intermediate & acid igneous rocks</td> <td>Wullerdorf/intermediate & acid igneous rocks</td> </tr> <tr> <td>Wullerdorf/intermediate & acid igneous rocks</td> <td>Gumpal/sandstone, mudstone & miscellaneous rocks</td> <td></td> </tr> </tbody> </table>	Maju Sawit	LKSK	Landquest	Brantian Alluvium	Brantian Alluvium	Kinabatangan Alluvium	Kinabatangan Alluvium	Apas/intermediate & acid igneous rocks	Apas/intermediate & acid igneous rocks	Sipit/Mudstone, sandstone & miscellaneous rocks	Tinagat/intermediate & acid igneous rocks	Tinagat/intermediate & acid igneous rocks	Apas/intermediate & acid igneous rocks	Wullerdorf/intermediate & acid igneous rocks	Wullerdorf/intermediate & acid igneous rocks	Wullerdorf/intermediate & acid igneous rocks	Gumpal/sandstone, mudstone & miscellaneous rocks		Complied
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4.3.2	A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	<p>The management strategy for plantings on slopes is available in Land Clearing & Preparation SOP Doc No. TSHP/OPE/SOP01 Rev 0 Effective Date 01/07/2016. The SOP clearly stated:</p> <ol style="list-style-type: none"> No planting on areas with slope of more than 25 degrees. Soil erosion control by constructing terraces in all sloping areas with bund at regular interval of 20 meters to retain water. Slopes especially along some road side to be planted with LCC (<i>Mucuna bracteata</i>). 	Complied																		

Criterion / Indicator		Assessment Findings	Compliance
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	Road maintenance programme for 2019 is available. During the field visit, it was noted that road conditions were well maintained and accessibility were made possible by regular road maintenance programme that comprise of; a) road resurfacing, b) grading & compacting c) culvert maintenance. The maintenance programme have been included in the annual budget sighted. Roads at Landquest and LKSK estates were well paved with stone while at Maju Sawit estate holes patching using excess stone by roadside are being done monthly. Maju Sawit estate plan to conduct road grading and compaction of 15.3 km in July 2019.	Complied
4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -	Not applicable as there was no presence of peat soil at all estates visited.	Complied
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	Not applicable as there was no presence of peat soil at all estates visited.	Complied
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	Not applicable as there was no presence of peat soil at all estates visited.	Complied
Criterion 4.4: Practices maintain the quality and availability of surface and ground water.			

4.4.1	An implemented water management plan shall be in place. - Minor compliance -	<p>The management has established the Water Management Plan – captured under the <i>Environment Continual Improvement Plan 2015-2020</i>. Therein containing the following details;</p> <table border="1" data-bbox="1025 491 1841 1388"> <thead> <tr> <th></th> <th>Objective</th> <th>Target</th> <th>Program</th> <th>PIC</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Efficiency use of sources</td> <td>Continual practice</td> <td>Usage of flow meter rainfall data</td> <td>Mill QA/ Estate Exec</td> </tr> <tr> <td>2</td> <td>To ensure no adverse impacts within catchment area</td> <td>Continual practice</td> <td>Water quality sampling /analysis</td> <td>Mill QA</td> </tr> <tr> <td>3</td> <td>Avoid contamination of surface and ground water</td> <td>Continual practice</td> <td rowspan="2">Avoid contamination of POME & plantation activities at gazette area</td> <td>Mill Manager</td> </tr> <tr> <td>4</td> <td>To ensure no adverse impacts from plantation activities</td> <td>Continual practice</td> <td>Estate Exec</td> </tr> <tr> <td>5</td> <td>No construction of bunds/weirs/dams across main waterways</td> <td>Continual practice</td> <td>To demarcate river location on estate mapping & avoid construction of bund/weirs/dams</td> <td>Estate Exec</td> </tr> <tr> <td>6</td> <td>To ensure natural water</td> <td>Continual practice</td> <td>Monitoring of stream water</td> <td>Estate/ Mill Manager</td> </tr> </tbody> </table>		Objective	Target	Program	PIC	1	Efficiency use of sources	Continual practice	Usage of flow meter rainfall data	Mill QA/ Estate Exec	2	To ensure no adverse impacts within catchment area	Continual practice	Water quality sampling /analysis	Mill QA	3	Avoid contamination of surface and ground water	Continual practice	Avoid contamination of POME & plantation activities at gazette area	Mill Manager	4	To ensure no adverse impacts from plantation activities	Continual practice	Estate Exec	5	No construction of bunds/weirs/dams across main waterways	Continual practice	To demarcate river location on estate mapping & avoid construction of bund/weirs/dams	Estate Exec	6	To ensure natural water	Continual practice	Monitoring of stream water	Estate/ Mill Manager	Complied
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Criterion / Indicator		Assessment Findings				Compliance
			ways not affected by estate/mill activities		quality performed periodically	
		7	Water conservation plan to maximize water efficiency all type of water bodies to be conserved such as rain water, lake water, mineral water, river water	Continual practice	Conduct rain water harvesting for house and operation	Estate Manager
					Systematic drainage /bunds to remove excess water	Estate Manager
					Planting of LCC on terrace fringes. Construction of terraces , appropriate frond stacking methods	Estate Manager
		The management has conducted review on 25/4/19 with action to be taken indicated therein				

<p>4.4.2</p>	<p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -</p>	<p>The estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing TSHR policy to maintain the buffer by restricting agrochemicals application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the <i>River Reserve Management (Management of River Reserve in TSHR)</i>. The buffer zones established are as follows:</p> <table border="1" data-bbox="1106 683 1592 887"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>> 40 meters</td> <td>50 meters</td> </tr> <tr> <td>20- 40 meters</td> <td>40 meters</td> </tr> <tr> <td>10- 20 meters</td> <td>20 meters</td> </tr> <tr> <td>5 - 10 meters</td> <td>10 meters</td> </tr> <tr> <td>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>The signboards were displayed accordingly at the site where applicable. The guideline was issued by the QESH Department latest revision dated on 13/6/2011. During the field visit there was no spraying activities or signs left in such an area. During the field visit to all the estates it was observed that all the buffer zones and watercourses boundaries were maintained without noting any sign of spraying made in the identified areas.</p> <table border="1" data-bbox="1030 1193 1677 1356"> <thead> <tr> <th></th> <th>Estate</th> <th>Buffer zone visited</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Maju Sawit</td> <td>Field no P2018 – <i>Sg Pang Burong</i></td> </tr> <tr> <td>2</td> <td>LKSK</td> <td>Field no 98E, OP98A – natural water stream</td> </tr> </tbody> </table>	River width	Buffer zone	> 40 meters	50 meters	20- 40 meters	40 meters	10- 20 meters	20 meters	5 - 10 meters	10 meters	< 5 meters	5 meters		Estate	Buffer zone visited	1	Maju Sawit	Field no P2018 – <i>Sg Pang Burong</i>	2	LKSK	Field no 98E, OP98A – natural water stream	<p>Complied</p>
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Criterion / Indicator		Assessment Findings				Compliance																																																						
		3	Landquest	Field no P1997 – Water natural catchment																																																								
4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -	<p>The mill analyzed the effluent quality on monthly basis and submitted the results on a quarterly basis. Analysis as take at random as shown below.</p> <table border="1"> <thead> <tr> <th></th> <th>Parameters</th> <th>Standard</th> <th>8/1/19</th> <th>7/2/19</th> <th>6/3/19</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PH</td> <td>5.0-9.0</td> <td>8.21</td> <td>7.54</td> <td>7.82</td> </tr> <tr> <td>2</td> <td>BOD mg/l</td> <td>20.00</td> <td>6.30</td> <td>15.00</td> <td>19.00</td> </tr> <tr> <td>3</td> <td>COD</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>4</td> <td>Total solids</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>5</td> <td>SS</td> <td>200 mg/l</td> <td>62.0</td> <td>62.0</td> <td>16.0</td> </tr> <tr> <td>6</td> <td>Oil & Grease</td> <td>20 mg/l</td> <td>6.20</td> <td>11.00</td> <td>1.50</td> </tr> <tr> <td>7</td> <td>A Nitrogen</td> <td>150 mg/l</td> <td>0.20</td> <td>1.70</td> <td>0.20</td> </tr> <tr> <td>8</td> <td>Total N</td> <td>200 mg/l</td> <td>0.50</td> <td>4.20</td> <td>0.50</td> </tr> </tbody> </table> <p>All parameters in compliance with the DOE standards. COD and total solids are not indicated in the DOE <i>Jadual Pematuhan</i></p>					Parameters	Standard	8/1/19	7/2/19	6/3/19	1	PH	5.0-9.0	8.21	7.54	7.82	2	BOD mg/l	20.00	6.30	15.00	19.00	3	COD	-	-	-	-	4	Total solids	-	-	-	-	5	SS	200 mg/l	62.0	62.0	16.0	6	Oil & Grease	20 mg/l	6.20	11.00	1.50	7	A Nitrogen	150 mg/l	0.20	1.70	0.20	8	Total N	200 mg/l	0.50	4.20	0.50	Complied
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Criterion / Indicator		Assessment Findings	Compliance																																																								
4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	<p>The mill monitored the water consumption and tabulated performance in a graph. Results as sampled as shown below.</p> <table border="1"> <thead> <tr> <th>Month/19</th> <th>Water</th> <th>FFB /mt</th> <th>Water/FFB</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>17228</td><td>39633</td><td>0.43</td></tr> <tr><td>Feb</td><td>18270</td><td>36044</td><td>0.51</td></tr> <tr><td>Mac</td><td>17823</td><td>44994</td><td>0.40</td></tr> <tr><td>April</td><td>16020</td><td>41200</td><td>0.39</td></tr> <tr><td>May</td><td>13787</td><td>33061</td><td>0.42</td></tr> <tr><td>June</td><td>13470</td><td>29539</td><td>0.46</td></tr> <tr><td>July</td><td>13534</td><td>31504</td><td>0.43</td></tr> <tr><td>Aug</td><td>13058</td><td>33509</td><td>0.39</td></tr> <tr><td>Sept</td><td>13105</td><td>36112</td><td>0.36</td></tr> <tr><td>Oct</td><td>14732</td><td>42167</td><td>0.35</td></tr> <tr><td>Nov</td><td>15563</td><td>40114</td><td>0.39</td></tr> <tr><td>Dec</td><td>16658</td><td>41589</td><td>0.40</td></tr> <tr><td>Mean</td><td>15271</td><td>37456</td><td>0.41</td></tr> </tbody> </table> <p>The set target is 1.5 waterL/FFB mt The consumption is within the industry standard.</p>	Month/19	Water	FFB /mt	Water/FFB	Jan	17228	39633	0.43	Feb	18270	36044	0.51	Mac	17823	44994	0.40	April	16020	41200	0.39	May	13787	33061	0.42	June	13470	29539	0.46	July	13534	31504	0.43	Aug	13058	33509	0.39	Sept	13105	36112	0.36	Oct	14732	42167	0.35	Nov	15563	40114	0.39	Dec	16658	41589	0.40	Mean	15271	37456	0.41	Complied
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<p>Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.</p>																																																											

Criterion / Indicator		Assessment Findings	Compliance
4.5.1	<p>Implementation of Integrated Pest Management (IPM) plans shall be monitored.</p> <p>- Major compliance -</p>	<p>All three estates under Kunak POM Certification Unit continued to implement IPM as per;</p> <p>a) Company's Pest & Disease Management and b) The Plantation Operations SOP/Work Instructions.</p> <p>The estates continued to carry out monthly detection and observation of pest and disease through the daily supervision. It was also highlighted during Agronomist and PA visits. Records showed that there was no Pest & Disease outbreak had taken place. Monitoring of rat census had been carried out since beginning January 2019 at all estates. Results showed their population were well controlled – 0% at Lanquest, 0.71% to 3.15% at LKSK and Maju Sawit. Hence, no rat bait had been applied during this audit period.</p> <p>All the above estates maintained planting of beneficial plants in accordance to the guidelines as stipulated in the SOP; Beneficial plant ratio is 40 m: ha</p> <ul style="list-style-type: none"> - 8 m Antigonon - 8 m Tunera - 24 m Cassia 	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance												
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	<p>IPM training had been given at the estates as follows:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Date</th> <th>No of workers</th> </tr> </thead> <tbody> <tr> <td>Maju</td> <td>25.3.2019</td> <td>10</td> </tr> <tr> <td>Landquest</td> <td>25.3.2019</td> <td>4</td> </tr> <tr> <td>LKSK</td> <td>25.3.2019</td> <td>8</td> </tr> </tbody> </table> <p>The training include Safe Handling of Chemicals, Safety Data Sheet (SDS) and Use of PPE.</p>	Estate	Date	No of workers	Maju	25.3.2019	10	Landquest	25.3.2019	4	LKSK	25.3.2019	8	Complied
Estate	Date	No of workers													
Maju	25.3.2019	10													
Landquest	25.3.2019	4													
LKSK	25.3.2019	8													
<p>Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment</p>															

<p>4.6.1</p>	<p>Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance -</p>	<p>Justification for estates to continue use agrochemicals are based on the following manuals</p> <ul style="list-style-type: none"> a) Company's Pest & Disease Management b) IPM Plan and c) Plantation Operations SOP/Work Instructions. <p>A chemical register was sighted available that tabulates:</p> <ul style="list-style-type: none"> a) the purpose of usage (intended target), b) hazards signage, c) trade and generic names as well as the specific targets d) the correct dosage of agrochemicals to be used. <p>The use of pesticide is specific to the targeted pest, weed and disease. Justification takes consideration to minimize effect on non-target species.</p> <p>Sampled SOP Rat [P&D-SOP07-03, rev. 3, 1/2/2017]. Threshold level to initiate baiting is 5% fresh damage.</p> <p>SOP Weeding Doc. No. TSH/OPE/SOP05 REV 0. Effective Date 01/07/2016 is also used as described below:</p> <ul style="list-style-type: none"> A. Palm Circle depend on palm growth <ul style="list-style-type: none"> i. <u>Immature Palm</u> 0.6m radius (without Mucuna) and 1m radius (with Mucuna) use of suitable contact (non-hormonal) and maintain full ground cover in the inter-row to minimize useage of chemicals in weed control. ii. <u>Mature Palm</u> 3m from palm base iii. 13-24 months use glufosinate ammonium (15%) at rate 3.6l/ha and 25 months and above use glyphosate potassium (48.7%) at 2l/ha B. Selective Spraying depend on palm age 	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> i. <u>7-12 month</u> - 3 to 4 times per year ii. <u>12 month above</u> – 3 times per year <p>Any chemical, rate or round changes need Group Executive Director Approval.</p> <p>Woody shrubs: 1 part Triclopyr Butoxy Ethyl 32.1 % to 19 parts water. For Lallang eradication use Glyphosate isopropylamine 41 %</p> <p>All chemicals usage was based on the “need to do basis” to enhance field operations. It was found that no Class I & II chemicals had been used. The pesticides used were only for the control of weeds in the field upkeep.</p>	

<p>4.6.2</p>	<p>Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -</p>	<p>Pesticides used (including active ingredients used and area treated, amount of active ingredients applied per ha and number of applications) was monitored and recorded. It was last updated on 10th June 2019. Based on the records, the major pesticides used was glyphosate.</p> <p>Maju Sawit Estate</p> <table border="1"> <thead> <tr> <th rowspan="2">Active ingredients</th> <th colspan="4">a.i/ha (kg/ha)</th> </tr> <tr> <th colspan="2">2018</th> <th colspan="2">2019</th> </tr> </thead> <tbody> <tr> <td>Mature Area, ha</td> <td>104</td> <td></td> <td>87.5</td> <td></td> </tr> <tr> <td>Immature Area, ha</td> <td></td> <td>31.5</td> <td></td> <td>81.5</td> </tr> <tr> <td>2,4 D-dimethylammonium 48% (LD₅₀ rat 5 mg/kg)</td> <td>0.07 2rnd/yr</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Triclopyr butotyl 32.1% (LD₅₀ rat 2500 mg/kg)</td> <td>0.48 2rnd/yr</td> <td></td> <td>0.23 2rnd/yr</td> <td></td> </tr> <tr> <td>Metsulfuron methyl 20% (LD₅₀ rat 5000 mg/kg)</td> <td></td> <td></td> <td></td> <td>0.61 2rnd/yr</td> </tr> <tr> <td>Glyphosate Isoprpylamine 41% (LD₅₀ rat 5000 mg/kg)</td> <td>2.33 2rnd/yr</td> <td></td> <td>1.55 2rnd/yr</td> <td></td> </tr> <tr> <td>Gulfosinate ammonium 24.5% (LD₅₀ rat 2000 mg/kg)</td> <td></td> <td>0.09 6rnd/yr</td> <td>0.06 6rnd/yr</td> <td></td> </tr> <tr> <td>Polyether modified trisiloxane (LD₅₀ rat mg/kg)</td> <td></td> <td></td> <td></td> <td>0.92 weekly</td> </tr> <tr> <td>TOTAL</td> <td>2.88</td> <td>0.09</td> <td>1.85</td> <td>1.53</td> </tr> </tbody> </table> <p>Landquest Estate</p> <table border="1"> <thead> <tr> <th>Active ingredients</th> <th colspan="4">a.i/ha (kg/ha)</th> </tr> </thead> </table>	Active ingredients	a.i/ha (kg/ha)				2018		2019		Mature Area, ha	104		87.5		Immature Area, ha		31.5		81.5	2,4 D-dimethylammonium 48% (LD ₅₀ rat 5 mg/kg)	0.07 2rnd/yr				Triclopyr butotyl 32.1% (LD ₅₀ rat 2500 mg/kg)	0.48 2rnd/yr		0.23 2rnd/yr		Metsulfuron methyl 20% (LD ₅₀ rat 5000 mg/kg)				0.61 2rnd/yr	Glyphosate Isoprpylamine 41% (LD ₅₀ rat 5000 mg/kg)	2.33 2rnd/yr		1.55 2rnd/yr		Gulfosinate ammonium 24.5% (LD ₅₀ rat 2000 mg/kg)		0.09 6rnd/yr	0.06 6rnd/yr		Polyether modified trisiloxane (LD ₅₀ rat mg/kg)				0.92 weekly	TOTAL	2.88	0.09	1.85	1.53	Active ingredients	a.i/ha (kg/ha)				<p>Complied</p>
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		2018		2019	
Mature Area, ha		270		169	
Immature Area, ha			94.4		195.4
2,4 D- dimethylammonium 48% (LD ₅₀ rat 5 mg/kg)					
Triclopyr butotyl 32.1% (LD ₅₀ rat 2500 mg/kg)	0.25 2rnd/yr			0/08 2rnd/yr	
Metsulfuron methyl 20% (LD ₅₀ rat 5000 mg/kg)	0.04 2rnd/yr			0.01 2rnd/yr	0.01
Glyphosate Isoprpylamine 41% (LD ₅₀ rat 5000 mg/kg)	1.06 4rnd/yr			0.78 4rnd/yr	
Gulfosinate ammonium 24.5% (LD ₅₀ rat 2000 mg/kg)			0.18 6rnd/yr		0.01 6rnd/yr
Polyether modified trisiloxane (LD ₅₀ rat mg/kg)			0.03 weekly		
Non-ionic surfactant					0.41 2rnd/yr
TOTAL		1.35	0.21	0.86	0.42
LKSK Estate					
Active ingredients	a.i/ha (kg/ha)				
	2018		2019		
Mature Area, ha	968		904		
Immature Area, ha		0		58	
2,4 D- dimethylammonium 48% (LD ₅₀ rat 5 mg/kg)					

Criterion / Indicator		Assessment Findings					Compliance
		Triclopyr butotyl 32.1% (LD ₅₀ rat 2500 mg/kg)	0.25 2rnd/y r		0.04 2rnd/yr		
		Metsulfuron methyl 20% (LD ₅₀ rat 5000 mg/kg)			0.01 2rnd/yr		
		Glyphosate Isoprpylamine 41% (LD ₅₀ rat 5000 mg/kg)	0.98 4rnd/y r		0.52 4rnd/yr		
		Gulfosinate ammonium 24.5% (LD ₅₀ rat 2000 mg/kg)					
		9016-72-2 Propineb	0.01				
		Polyether modified trisiloxane (LD ₅₀ rat mg/kg)	0.01		0.01 weekly	0.01 weekly	
			1.25	0	0.58	0.01	
4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -	<p>The IPM implementations described in Indicator 4.5.1 are meant to minimise the use of pesticides. Rat bait, Warfarin was last used in 2017 at Maju Sawit Estate. To date FFB damage is minimal (below threshold value) and no application of Warfarin being initiated. There is no prophylactic use of pesticides at all estates visited.</p>					Complied

Criterion / Indicator	Assessment Findings	Compliance
4.6.4	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances.</p> <p>- Minor compliance -</p>	<p>Chemicals stores visit at all estates found no Paraquat nor used paraquat container present. Alternatives such as Glyphosate were used instead with the elimination of Paraquat.</p> <p>It was also noted that the visited estates had not use chemicals categorized as World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions. This is made evidence through the store issues, interviews of staff, sprayers and the procedures provided in the SOP.</p>

<p>4.6.5</p>	<p>Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance -</p>	<p>All estate workers involved in handling chemicals had completed the relevant training vis-à-vis among those sampled are listed below. In addition to formal training all precautions attached to the products and the need to correctly wear the PPE were again reminded during muster call.</p> <p>They understood the dangers of the chemicals and the reason why to don the required PPE was verified by the auditor in the field during the interviews with workers.</p> <p><u>Maju Estate</u></p> <table border="1"> <thead> <tr> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>20.3.2019</td> <td>Safe Chemical handling</td> <td>3</td> </tr> <tr> <td>18.3.2019</td> <td>Safe Chemical handling</td> <td>10</td> </tr> <tr> <td>9.3.2019</td> <td>SDS Awareness</td> <td>3</td> </tr> <tr> <td>15.4.2019</td> <td>Spraying SOP</td> <td>6</td> </tr> <tr> <td>7.6.2018</td> <td>Chemical a.i justification</td> <td>4</td> </tr> <tr> <td>12.2.2019</td> <td>PPE Adherence</td> <td>10</td> </tr> </tbody> </table> <p><u>Landquest Estate</u></p> <table border="1"> <thead> <tr> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>14.3.2019</td> <td>IPM Awareness</td> <td>4</td> </tr> <tr> <td>12.6.2019</td> <td>Safe Chemical handling</td> <td>9</td> </tr> <tr> <td>27.5.2019</td> <td>Chemical a.i justification</td> <td>2</td> </tr> <tr> <td>27.2.2019</td> <td>PPE Adherence</td> <td>All</td> </tr> </tbody> </table> <p><u>LKSK Estate</u></p>	Date	Subject	Attendees	20.3.2019	Safe Chemical handling	3	18.3.2019	Safe Chemical handling	10	9.3.2019	SDS Awareness	3	15.4.2019	Spraying SOP	6	7.6.2018	Chemical a.i justification	4	12.2.2019	PPE Adherence	10	Date	Subject	Attendees	14.3.2019	IPM Awareness	4	12.6.2019	Safe Chemical handling	9	27.5.2019	Chemical a.i justification	2	27.2.2019	PPE Adherence	All	<p>Complied</p>
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Criterion / Indicator		Assessment Findings			Compliance
		Date	Subject	Attendees	
		14.3.2019	IPM Awareness	8	
		29.4.2019	Safe Chemical handling	6	
		29.4.2019	SDS Awareness	5	
		12.2.2019	PPE - Spraying	8	
		16.4.2019	Spraying SOP	7	
		21.5.2019	PPE Adherence	8	

Criterion / Indicator	Assessment Findings	Compliance
<p>4.6.6 Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -</p>	<p>At all visited estates the storage of pesticides for use was in accordance with recognized best practices, namely, as per Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders and Pesticides Act 1974 (Act 149) and its Regulations.</p> <p>Their chemical stores were inspected and the following were noted.</p> <ul style="list-style-type: none"> • All stores were secured under lock and key with restricted access. • Provision of ventilation fan. • Display of Safety Pictorial poster, namely the required PPE • Pesticides were separated by class. • Concrete cemented floor, bund wall and provision of sump pond. • Store keeper was trained in the handling of all pesticides. • SDS leaflets were available at all pesticide stores. <p>With the exception of some 20-liter empty agrochemical containers being recycled for holding premixed pesticides for onward delivery to field, the rest of the empty chemical containers were triple rinsed, pierced and stored in dedicated store in accordance to procedure TSHR/ENV/W101 dated 1.11.2017. They were not use for other purpose. They were and being disposed to Newgate Industries (Borneo), a Ministry of Agriculture Registered Waste Collector for empty plastic containers.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	The quantity of agrochemicals required for various field conditions were documented and justified in the SOP. The field implementation was consistent with the SOP. Application of pesticides for Pest and Disease Management was per P&D SOP 01-00 to SOP14-01 and for spraying it was per Weeding SOP - Chemical recommendations/Manual weeding. For weeding activities, knapsack spray pump and low volume CDA spray were used for selective and circle spraying	Complied
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	There was no aerial spraying observed at the Maju, Landquest and LKSK estates.	Complied
4.6.9	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	The Kunak POM complex did not associate itself with smallholders. The Maju, Landquest and LKSK estates Store Clerk and Sprayers demonstrated knowledge and skills on pesticide handling. They understood the danger of these chemicals and were seen following the proper handling procedure, observing safety pictorial poster and PPE requirements, both at the agrochemical store and as sighted during application in the field. Kindly refer to Indicator 4.8.2 for dates and number of workers trained on Safe Handling of Chemical, PPE and SOP Spraying.	Complied

<p>4.6.10</p>	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -</p>	<p>The procedure TSHR/ENV/SOP03 dated 04/7/16 <i>Waste Management - Scheduled Wastes (Hazardous Waste) Management</i> has been established. Therein containing details relating to;</p> <ul style="list-style-type: none"> a) Waste identification / disposal plan b) Scheduled waste inventory/inspection checklist c) Return of emptied chemical container d) Environment monitoring records e) SW maintenance records <p>Collection is made by <i>M/s Lagenda Bumimas Sdn Bhd</i> a DOE licensed contractor. Details of recent collection as given below;</p> <table border="1" data-bbox="1028 732 1785 1203"> <thead> <tr> <th></th> <th>Estate/Mill</th> <th>SW disposed</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>KPOM</td> <td>SW 408 – 0.001 mt</td> <td>27/5/19</td> </tr> <tr> <td></td> <td></td> <td>SW 322 – 0.010 mt</td> <td>27/5/19</td> </tr> <tr> <td></td> <td></td> <td>SW 410 – 0.011 mt</td> <td>27/5/19</td> </tr> <tr> <td></td> <td></td> <td>SW 306 – 0.006 mt</td> <td>27/5/19</td> </tr> <tr> <td>2</td> <td>Maju Sawit</td> <td>Shared delivery with KPOM</td> <td></td> </tr> <tr> <td>3</td> <td>Landquest</td> <td>SW 102 – 0.075 mt</td> <td>27/5/19</td> </tr> <tr> <td></td> <td></td> <td>SW 305 – 0.081 mt</td> <td>27/5/19</td> </tr> <tr> <td></td> <td></td> <td>SW 408 – 0.006 mt</td> <td>27/5/19</td> </tr> <tr> <td></td> <td></td> <td>SW 410 – 0.010 mt</td> <td>27/5/19</td> </tr> <tr> <td>4</td> <td>LKSK</td> <td>SW410 – 0.007 mt</td> <td>27/5/19</td> </tr> <tr> <td></td> <td></td> <td>SW102 – 0.014 mt</td> <td>27/5/19</td> </tr> <tr> <td></td> <td></td> <td>SW 305 – 0.020</td> <td>27/5/19</td> </tr> </tbody> </table> <p>Training provided to employees via the following subjects and session</p> <ul style="list-style-type: none"> a) SW handling/tripe rinse/despatch b) Environmental Policy and Guidelines 		Estate/Mill	SW disposed	Date	1	KPOM	SW 408 – 0.001 mt	27/5/19			SW 322 – 0.010 mt	27/5/19			SW 410 – 0.011 mt	27/5/19			SW 306 – 0.006 mt	27/5/19	2	Maju Sawit	Shared delivery with KPOM		3	Landquest	SW 102 – 0.075 mt	27/5/19			SW 305 – 0.081 mt	27/5/19			SW 408 – 0.006 mt	27/5/19			SW 410 – 0.010 mt	27/5/19	4	LKSK	SW410 – 0.007 mt	27/5/19			SW102 – 0.014 mt	27/5/19			SW 305 – 0.020	27/5/19	<p>Minor nonconformance</p>
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Criterion / Indicator		Assessment Findings	Compliance																
		<p>c) Water treatment plants d) Management of buffer zone / riparian areas</p> <p>However, during the site visit Maju Sawit and LKSK estates the staff concerned was unable to explain the guidelines of the landfill maintenance despite the condition of the pit looked unsatisfactory. Furthermore, the understanding of person-in-charge on the land fill management is not sufficient upon interview. Hence, a minor NC has been raised on the matter.</p>																	
4.6.11	<p>Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -</p>	<p>Sampled annual medical surveillance had been conducted by DOSH Registered Occupational Health Doctor, Reg. No. JKPP HQ/18/DOC/00/0201 from DAB OH Sdn. Bhd at the CU as follows:</p> <table border="1"> <thead> <tr> <th>Estates</th> <th>Date</th> <th>Workers examined</th> <th>Results</th> </tr> </thead> <tbody> <tr> <td>Maju</td> <td>16.4.2019</td> <td>2 sprayers 1 Storekeeper</td> <td>All fit to work</td> </tr> <tr> <td>Landquest</td> <td>18.4.2019</td> <td>7 Sprayers 1 Storekeeper</td> <td>All fit to work</td> </tr> <tr> <td>LKSK</td> <td>17.4.2019</td> <td>2 Welders 6 Sprayers 2 Storekeeper</td> <td>All fit to work</td> </tr> </tbody> </table> <p>The result of the Medical Examinations showed all workers were fit to work and it was communicated accordingly to them.</p>	Estates	Date	Workers examined	Results	Maju	16.4.2019	2 sprayers 1 Storekeeper	All fit to work	Landquest	18.4.2019	7 Sprayers 1 Storekeeper	All fit to work	LKSK	17.4.2019	2 Welders 6 Sprayers 2 Storekeeper	All fit to work	Complied
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4.6.12	<p>No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -</p>	<p>Records of all 5 female sprayers showed they were not pregnant or are breast feeding women. Last pregnancy test undertaken was in April 2019</p>	Complied																

Criterion / Indicator	Assessment Findings	Compliance
Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:		

<p>4.7.1</p>	<p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. - Major compliance -</p>	<p>The established Occupational Safety & Health (OSH) Policy was sighted displayed at KPOM and estate offices. The policy dated 16.10.2015, signed by Dato’ Tan Aik Sim, Managing Director of TSH has been communicated to all employees via training, briefing such tool box at mill and morning muster at estates and hardcopy displayed at the mill and estates notice boards. In line with the established policy, OSH plan was verified at the visited mill and estates.</p> <p>The health and safety plan had been documented, implemented and monitored, among others, it included:</p> <ul style="list-style-type: none"> • establishing OSH Committee and ensure the functioning of the Committee that include Quarterly meeting and conduct Workplace Inspection. See Indicator 4.7.4; • establishing of OSH objectives and monitoring of Safety Performance; • HIRADC review, that is, all operations being risk assessed and control as per established SOP. See Indicator 4.7.2; • Establishing and updating OSH Legal and Other Requirement Register and annual evaluation of its compliance. See Indicator 2.1.1 and 2.1.3; • OSH training including yearly ERP exercise and drill. See Indicator 4.8.2; • Workplace accident notification, investigation and reporting. See 4.7.5; • Placement of Protective Personal Equipment (PPE) Posters and signages as well as Electrical Danger Signages and simplified SOP at work stations – see Indicator 4.7.3; • Annual Audiometric test; • Medical Surveillance; • Chemical Health and Risk Assessment; 	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>The plan effectiveness was monitored at various intervals, for example:</p> <ul style="list-style-type: none"> • daily for Shovel Inspection Checklist and wearing of PPE, • 3-monthly as in monitoring of OSH objectives, targets and programmes, OSH Committee meeting and Workplace Inspection, female sprayers' pregnancy test. • annually, in the case of Audiometric Surveillance, Medical Surveillance, evaluation of compliance to Legal and Other requirements. • 5-yearly renewal assessment for Chemical Health and Risk Assessment and recommendation by Assessor acted accordingly. 	

<p>4.7.2</p>	<p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. - Major compliance -</p>	<p>All operations where health and safety is an issue has been risk assessed, and procedures and actions were documented and implemented to address the identified issues. Refer Hazard Identification, Risk and Determining Control (HIRADC) doc. no. TSHR/OSH/SOP01 dated 1/9/2015.</p> <p>The end product a Risk Assessment Register using HIRADC form, TSHR/OSH/F01 was sighted available at the POM and estates visited. Example of HIRARC established were not limited to the following: At Kunak POM:</p> <ul style="list-style-type: none"> i. Maintenance and servicing – pump, press, screw conveyor, ii. Welding and oxy- cutting job, electrical works iii. Sterilizer – operation, cages handling, iv. Boiler house – confine space entry and maintenance, clinker raking activities, v. Engine room operation and maintenance, vi. Working at height. vii. CPO dispatch viii. Oil and effluent water sampling and analysis <p>At the estates</p> <ul style="list-style-type: none"> i. Pesticides spraying, ii. Manuring, iii. Harvesting, iv. Weeding v. FFB loading and collection at field, vi. Rat baiting, vii. Workshop operations, viii. Chemical, fertilizer, lubricant and Scheduled waste store 	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance																												
	<p>For every hazard recognized in the Risk Register their corresponding actions have been documented and implemented to address the identified issues.</p> <p>HIRARC Register was last updated as follows:</p> <table border="1" data-bbox="1028 555 1765 724"> <thead> <tr> <th></th> <th>Sites</th> <th>Date last update</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>KPOM</td> <td>12.4.2019</td> </tr> <tr> <td>2</td> <td>Maju Estate</td> <td>15.4.2019</td> </tr> <tr> <td>3</td> <td>Landquest Estate</td> <td>1.4.2019</td> </tr> <tr> <td>4</td> <td>LKSK Estate</td> <td>15.4.2019</td> </tr> </tbody> </table> <p>With respect to CHRA all reports produced by Assessor remained valid, that is, their validity period has not expired. All precautions recommended by the Assessor had been properly observed and applied to the workers. CHRA at the CU was conducted by DOSH Registered Assessor as follows:</p> <table border="1" data-bbox="1028 954 1785 1187"> <thead> <tr> <th>Sites</th> <th>Date assessed</th> <th>Assessor DOSH Reg. No.</th> </tr> </thead> <tbody> <tr> <td>KPOM</td> <td>16.6.2017</td> <td>JKKP HIE 127/171-2(290)</td> </tr> <tr> <td>Maju Estate</td> <td>9.10.2019</td> <td rowspan="3">HQ/11/ASS/00/298-2017/050</td> </tr> <tr> <td>Landquest Estate</td> <td>10.10.2017</td> </tr> <tr> <td>LKSK Estate</td> <td>11.10.2017</td> </tr> </tbody> </table>		Sites	Date last update	1	KPOM	12.4.2019	2	Maju Estate	15.4.2019	3	Landquest Estate	1.4.2019	4	LKSK Estate	15.4.2019	Sites	Date assessed	Assessor DOSH Reg. No.	KPOM	16.6.2017	JKKP HIE 127/171-2(290)	Maju Estate	9.10.2019	HQ/11/ASS/00/298-2017/050	Landquest Estate	10.10.2017	LKSK Estate	11.10.2017	
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<p>4.7.3</p>	<p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. - Minor compliance -</p>	<p>During field assessment, Sprayers and Harvesters were able to inform the assessment team about the fundamental of safety, the reason to work safely, the need to follow safe work practices and the consequence of deviation from procedures. For example, sprayers understood not to spray upwind as the spray drift could be blown to their body, face and work clothings and if these parts of the body were exposed to the drift mist they could be harmful to them. On long-term they inform they could get sick. It is, they said, not only to spray follow downwind but also the need to wear the PPE properly.</p> <p>Likewise, the Storekeeper at the mill was asked the danger of his work or workers under his supervision during unloading of diesel into skid tank. He said, among others:</p> <ul style="list-style-type: none"> • when climbing to the top of the tank (top filling tank) and opening the man-hole the worker could fall (down) as slippery surface may exist. • Likewise, the passing of the unloading hose to and from the Climber from Assistant at the bottom of the skid tank (before and after filling) could cause body ache (ergonomics) and fall. • The surrounding area is a No Smoking and No naked flame area he has to ensure no people smoke or hot work is conducted nearby. This is due to the combustible nature of diesel. • Proper PPE are required for the operation that is, dress uniform (long sleeve shirt and long pants), cotton gloves, goggles, face mask, hard hat and safety shoes. <p>All workers at the mill and estates have been found trained to read safety signages and safe working practices including SOP for donning PPE related to their job function. See Criteria 4.8 for sample of training given.</p>	<p>Complied</p>
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<p>4.7.4</p>	<p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. - Major compliance -</p>	<p>The respective Mill and Estate Manager appoint an Executive (Assistant Manager, Field Conductor) of theirs as the person in charge for safety and environment. The PIC role covers areas of responsibilities on safety, health and welfare of the staff/workers. The Mill and Estates Managers in turn are appointed as the Chairman for the S&H committee. His duties among others is to preside the S&H meetings, discharge the General Duties of Employers and make decision arising out of issues discussed for improvement to Safety, Health, Welfare and the Environment. Members of the committee comprised of equal representatives from Management and Workers covering key work station or areas.</p> <p>The committee met quarterly as tabulated below. Viewing the minutes of meeting, issues discussed include employees' safety, health and welfare, accident statistic, workplace inspection and action taken from previous workplace inspection report, legal compliance, safety and health training, etc.</p> <p>The minutes of meeting were sighted and verified. The dates of meetings held are recorded below.</p> <table border="1" data-bbox="1025 1054 1823 1393"> <thead> <tr> <th colspan="4">Kunak Palm Oil Mill jointly held meeting with Maju Estate</th> </tr> </thead> <tbody> <tr> <td>Meeting No. 1</td> <td>27.08.2018</td> <td>Meeting No 3</td> <td>26.02.2019</td> </tr> <tr> <td>Meeting No 2</td> <td>26.11.2018</td> <td>Meeting No 4</td> <td>22.05.2019</td> </tr> <tr> <th colspan="4">Landquest Estate</th> </tr> <tr> <td>Meeting No. 1</td> <td>21.09.18</td> <td>Meeting No 3</td> <td>26.03.19</td> </tr> <tr> <td>Meeting No 2</td> <td>18.12.18</td> <td>Meeting No 4</td> <td>12.06.19</td> </tr> </tbody> </table>	Kunak Palm Oil Mill jointly held meeting with Maju Estate				Meeting No. 1	27.08.2018	Meeting No 3	26.02.2019	Meeting No 2	26.11.2018	Meeting No 4	22.05.2019	Landquest Estate				Meeting No. 1	21.09.18	Meeting No 3	26.03.19	Meeting No 2	18.12.18	Meeting No 4	12.06.19	<p>Complied</p>
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Criterion / Indicator		Assessment Findings				Compliance
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		Meeting No 2	18.12.18	Meeting No 4	13.06.19	

<p>4.7.5</p>	<p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. - Minor compliance -</p>	<p>The certification unit continued to use the established Emergency Preparedness and Response Procedure, TSHR/OSH/SOP06 dated 4/7/2016. The procedure including accident reporting has been communicated to employees, contractors and visitors. Interviews with employees showed that they know who to contact during emergency. Emergency contact number were seen available at notice board of offices visited and also verified during interviews made known to employees at the POM and those working in the field.</p> <p>List of credible emergency scenarios foreseeable to occur at the mill and estates documented are as follows:</p> <ul style="list-style-type: none"> i) Accident/Incident involving human ii) Fire/Explosion Action Plan iii) Hazardous Material Spillage (chemical/Scheduled Wastes) iv) Effluent Overflow/Major Spillage v) CPO Spillage <table border="1" data-bbox="1028 943 1823 1214"> <thead> <tr> <th>Site</th> <th>Drill date</th> <th>Evacuation time, mins</th> <th>Type of drill</th> </tr> </thead> <tbody> <tr> <td>Landquest Estate</td> <td>4.4.2019</td> <td>5</td> <td rowspan="4">Building evacuation, Fire drill and use of Fire Extinguisher</td> </tr> <tr> <td>LKSK Estate</td> <td>4.4.2019</td> <td>11</td> </tr> <tr> <td>Maju Sawit</td> <td>1.4.2019</td> <td>2</td> </tr> <tr> <td>KPOM (combined)</td> <td></td> <td>9</td> </tr> </tbody> </table> <p>First aid box was sighted present at various places in the mill and with each mandore in the field. Assigned operatives were trained in First Aid. The latest training was on 28/03/2019 at KPOM, conducted by Cert Academy Sdn Bhd.</p>	Site	Drill date	Evacuation time, mins	Type of drill	Landquest Estate	4.4.2019	5	Building evacuation, Fire drill and use of Fire Extinguisher	LKSK Estate	4.4.2019	11	Maju Sawit	1.4.2019	2	KPOM (combined)		9	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>Records (forms JKPP 6, JKPP 7 and JKPP 8) of all accidents are kept and periodically reviewed. For annual accident statistic, JKPP 8 form for preceding year was submitted to DOSH timely.</p>	

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<p>4.7.6</p>	<p>All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -</p>	<p>All workers, local and foreign, were provided with medical care, and covered by SOCSO and accident insurance respectively. For local, Social Security contribution paid on month basis via form 8A, payment schedule. Verified payment for all workers as follows:</p> <table border="1" data-bbox="1028 523 1825 938"> <thead> <tr> <th>Operating unit</th> <th>No. workers covered</th> <th>Month contributed</th> <th>SOCSO receipt no.</th> </tr> </thead> <tbody> <tr> <td rowspan="2">KPOM</td> <td>88</td> <td>April 2019</td> <td>20190001842648</td> </tr> <tr> <td>88</td> <td>May 2019</td> <td>20190002253835</td> </tr> <tr> <td rowspan="2">Maju Sawit</td> <td>3</td> <td>April 2019</td> <td>2019000147400</td> </tr> <tr> <td>3</td> <td>May 2019</td> <td>20190001875440</td> </tr> <tr> <td rowspan="2">Landquest</td> <td>3</td> <td>April 2019</td> <td>20190001874966</td> </tr> <tr> <td>3</td> <td>May 2019</td> <td>20190002253809</td> </tr> <tr> <td rowspan="2">LKSK</td> <td>3</td> <td>April 2019</td> <td>20190001875406</td> </tr> <tr> <td>3</td> <td>May 2019</td> <td>20190001471925</td> </tr> </tbody> </table> <p>For foreign workers insurance they were covered under Allianz General Insurance, sampled at</p> <table border="1" data-bbox="1028 1034 1825 1393"> <thead> <tr> <th>Operating unit</th> <th>Policy No</th> <th>No. workers Insured</th> <th>Policy validity period</th> </tr> </thead> <tbody> <tr> <td>KPOM</td> <td>16WTW700105</td> <td>31</td> <td>20.6.2018 - 19.6.2019</td> </tr> <tr> <td>Maju Sawit</td> <td>18PTW5001559</td> <td>6</td> <td>14.9.2018 - 13.9.2019</td> </tr> <tr> <td>Landquest</td> <td>18PTW5000585/01</td> <td>3</td> <td>19.2.2019 - 18.2.2020</td> </tr> <tr> <td>LKSK</td> <td>18PTW5002167-00</td> <td>76</td> <td>30.12-2019 - 29.12.2020</td> </tr> </tbody> </table>	Operating unit	No. workers covered	Month contributed	SOCSO receipt no.	KPOM	88	April 2019	20190001842648	88	May 2019	20190002253835	Maju Sawit	3	April 2019	2019000147400	3	May 2019	20190001875440	Landquest	3	April 2019	20190001874966	3	May 2019	20190002253809	LKSK	3	April 2019	20190001875406	3	May 2019	20190001471925	Operating unit	Policy No	No. workers Insured	Policy validity period	KPOM	16WTW700105	31	20.6.2018 - 19.6.2019	Maju Sawit	18PTW5001559	6	14.9.2018 - 13.9.2019	Landquest	18PTW5000585/01	3	19.2.2019 - 18.2.2020	LKSK	18PTW5002167-00	76	30.12-2019 - 29.12.2020	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance															
4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	<p>All the injuries were recorded using the Total Accident/Incidents with and without lost days report. The statistics for 2019 year-to date is as follows:</p> <table border="1"> <thead> <tr> <th>Operating sites</th> <th>2018</th> <th>YTD 2019</th> </tr> </thead> <tbody> <tr> <td>KPOM</td> <td>1 case (58 LTI*)</td> <td>1 case (7 LTI*)</td> </tr> <tr> <td>Maju Estate</td> <td>0 case</td> <td>0 case</td> </tr> <tr> <td>Landquest Estate</td> <td>0 case</td> <td>0 case</td> </tr> <tr> <td>LKSK Estate</td> <td>0 case</td> <td>0 case</td> </tr> </tbody> </table> <p>*LTA/LTI is equivalent to lost mandays</p>	Operating sites	2018	YTD 2019	KPOM	1 case (58 LTI*)	1 case (7 LTI*)	Maju Estate	0 case	0 case	Landquest Estate	0 case	0 case	LKSK Estate	0 case	0 case	Complied
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Landquest Estate	0 case	0 case																
LKSK Estate	0 case	0 case																
<p>Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.</p>																		

<p>4.8.1</p>	<p>A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. - Major compliance -</p>	<p>The annual training program has been established and significantly covers all aspects of the RPSO requirements. There were also additional subjects including the mill operating procedures, parameters of mill produce, machinery maintenance etc. The training program also specified the target group of employees to be trained under the allocated subjects. The program mainly covers both requirement of the estates and mill in the CU. The subjects for the training are issued and assisted by the QESH personnel. The following topics included in the annual training program 2019 among others are extracted below;</p> <table border="1" data-bbox="1028 716 1789 1378"> <thead> <tr> <th></th> <th>Subjects</th> <th>Target Group</th> <th>Freq /Year</th> </tr> </thead> <tbody> <tr> <td></td> <td>Human Resource</td> <td></td> <td></td> </tr> <tr> <td>1</td> <td>Induction Program for employees</td> <td>All level</td> <td>1X</td> </tr> <tr> <td>2</td> <td>Sustainability awareness</td> <td>All level</td> <td>2X</td> </tr> <tr> <td>3</td> <td>Security Operations</td> <td>Exec</td> <td>2X</td> </tr> <tr> <td>4</td> <td>Grievances & Complaints</td> <td>All level</td> <td>2X</td> </tr> <tr> <td>5</td> <td>Violence & sexual harassment</td> <td>EX/NE</td> <td>2X</td> </tr> <tr> <td>6</td> <td>Human Resources/All Policies</td> <td>EX/NE/WK</td> <td>1X</td> </tr> <tr> <td>7</td> <td>Sabah Labour Ordinance</td> <td>EX/NE/WK</td> <td>1X</td> </tr> <tr> <td>8</td> <td>Employees Grievance / discipline</td> <td>EX/NE/WK</td> <td>1X</td> </tr> <tr> <td></td> <td>Environmental</td> <td></td> <td></td> </tr> <tr> <td>9</td> <td>Environmental awareness</td> <td>EX/NE/WK</td> <td>1X</td> </tr> <tr> <td>10</td> <td>SW management</td> <td>EX</td> <td>1X</td> </tr> <tr> <td>11</td> <td>EIA EAIA awareness</td> <td>MG/EX</td> <td>1X</td> </tr> <tr> <td>12</td> <td>HCV & Wildlife awareness</td> <td>MG/EX</td> <td>1X</td> </tr> </tbody> </table>		Subjects	Target Group	Freq /Year		Human Resource			1	Induction Program for employees	All level	1X	2	Sustainability awareness	All level	2X	3	Security Operations	Exec	2X	4	Grievances & Complaints	All level	2X	5	Violence & sexual harassment	EX/NE	2X	6	Human Resources/All Policies	EX/NE/WK	1X	7	Sabah Labour Ordinance	EX/NE/WK	1X	8	Employees Grievance / discipline	EX/NE/WK	1X		Environmental			9	Environmental awareness	EX/NE/WK	1X	10	SW management	EX	1X	11	EIA EAIA awareness	MG/EX	1X	12	HCV & Wildlife awareness	MG/EX	1X	<p>Complied</p>
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Criterion / Indicator		Assessment Findings				Compliance
			Quality			
		13	Parameters – Group & Industry	EX/NE/WK	2X	
		14	SOP	EX/NE/WK	3X	
			Mill Operations			
		15	Process station SOP	EX/NE/WK	3X	
		16	Parameters	EX/NE/WK	3X	
			Estate Operation			
		17	Operation SOP	EX/NE/WK	3X	
		18	Parameters and standards	EX/NE/WK	3X	
			Safety & Health			
		19	ESH plan and objectives	EX	1X	
		20	ESH quarterly meeting	Committee	4X	
		21	Roles of committees members	Committee	1X	
		22	Accident Investigation	Committee	4X	
			All Plant / Section			
		23	All mill process /WTP/ETP	EX/NE/WK	3X	
		24	All estates operation /WTP	EX/NE/WK	3X	
		25	IPM guidelines	EX/NE/WK	1X	

<p>4.8.2</p>	<p>Records of training for each employee shall be maintained. - Minor compliance -</p>	<p>Records of training has been maintained. This includes details i.e. subject, trainer, date and no of attendees. Training effectiveness were also made to access the level of understanding</p> <table border="1" data-bbox="1025 491 1805 1391"> <thead> <tr> <th colspan="4">KPOM</th> </tr> <tr> <th></th> <th>Date</th> <th>Topic</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>11/6/19</td> <td>Handling of hazardous chemical</td> <td>12</td> </tr> <tr> <td>2</td> <td>22/5/19</td> <td>Confined space SOP</td> <td>10</td> </tr> <tr> <td>3</td> <td>1/4/19</td> <td>ERP-Evacuation Drill</td> <td>Entire</td> </tr> <tr> <td>4</td> <td>28/3/19</td> <td>First Aid Box – Refresher</td> <td>8</td> </tr> <tr> <td>5</td> <td>19/1/19</td> <td>Safety SOP</td> <td>4</td> </tr> <tr> <td>6</td> <td>24/5/19</td> <td>Gen-Set Handling</td> <td>7</td> </tr> <tr> <td>7</td> <td>13/5/19</td> <td>Induction Program – New Worker</td> <td>1</td> </tr> <tr> <td>8</td> <td>13/5/19</td> <td>Store SOP</td> <td>3</td> </tr> <tr> <td>9</td> <td>2/5/19</td> <td>FFB Grading</td> <td>7</td> </tr> <tr> <td>10</td> <td>19/3/19</td> <td>Belt Press SOP</td> <td>4</td> </tr> <tr> <td>11</td> <td>25/1/19</td> <td>Induction Prog – New Worker</td> <td>2</td> </tr> <tr> <td>12</td> <td>25/5/19</td> <td>Return of empty container</td> <td>3</td> </tr> <tr> <td>13</td> <td>7/3/19</td> <td>Waste loading SOP</td> <td>1</td> </tr> <tr> <td>14</td> <td>20/2/19</td> <td>Environmental – Effluent WTP</td> <td>8</td> </tr> <tr> <td>15</td> <td>21/2/19</td> <td>SW handling</td> <td>5</td> </tr> <tr> <td>16</td> <td>14/2/19</td> <td>GHG calculation</td> <td>13</td> </tr> <tr> <td>17</td> <td>14/2/19</td> <td>GSR Guidelines</td> <td>13</td> </tr> <tr> <td>18</td> <td>14/2/19</td> <td>SW management</td> <td>13</td> </tr> <tr> <td>19</td> <td>28/3/19</td> <td>Document Retention Disposal</td> <td>5</td> </tr> </tbody> </table>	KPOM					Date	Topic	Attendees	1	11/6/19	Handling of hazardous chemical	12	2	22/5/19	Confined space SOP	10	3	1/4/19	ERP-Evacuation Drill	Entire	4	28/3/19	First Aid Box – Refresher	8	5	19/1/19	Safety SOP	4	6	24/5/19	Gen-Set Handling	7	7	13/5/19	Induction Program – New Worker	1	8	13/5/19	Store SOP	3	9	2/5/19	FFB Grading	7	10	19/3/19	Belt Press SOP	4	11	25/1/19	Induction Prog – New Worker	2	12	25/5/19	Return of empty container	3	13	7/3/19	Waste loading SOP	1	14	20/2/19	Environmental – Effluent WTP	8	15	21/2/19	SW handling	5	16	14/2/19	GHG calculation	13	17	14/2/19	GSR Guidelines	13	18	14/2/19	SW management	13	19	28/3/19	Document Retention Disposal	5	<p>Complied</p>
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		20	13/5/19	Biometric	3	
		21	01/4/19	Internal Stakeholder briefing	35	
		22	23/1/19	Policy briefings	2	
		23	19/1/19	Policy briefings	3	
		24	14/1/19	Internal Audit Procedure	5	
		25	27/3/19	Dust Analyzer – Handlings	4	
		26	25/3/19	Lubricants - Handlings	22	
		27	18/3/19	Health Screening	32	
		28	29/11/18	PPE Adherence	Entire	
		29	27/10/18	ERP – flood /Fire Drill	Entire	
		30	28/5/18	OSH committee roles	6	
		31	26/11/18	Process Consumables	3	
		32	27/9/18	Induction Program New FW	1	
		33	01/12/18	Biometric – New Workers	1	
		Maju Sawit Estate				
			Date	Topic	Attendees	
		1	01/4/19	Stakeholder briefing /Fire Drill	10	
		2	01/4/19	Riparian Zone / Zero Burning	10	
		3	01/4/19	HCV Wildlife monitoring	10	
		4	19/3/19	OSH Committee - Roles	10	
		5	19/3/19	OSH Self inspection SOP	10	
		6	13/3/19	EIA/ EAIA	2	
		7	8/1/19	Domestic waste	10	
		8	20/3/19	Safe Chemical Handlings	3	

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		9	20/3/19	ERP – Emergency equipment	3		
		10	18/3/19	Safe handling of chemical	10		
		11	9/3/19	SDS – Awareness	3		
		12	11/3/19	Accident Notification	2		
		13	6/3/19	PPE Adherence	2		
		14	4/3/19	Fire extinguisher inspection	2		
		15	18/2/19	Harvester safety	2		
		16	12/2/19	PPE adherence	10		
		17	15/4/19	Spraying SOP	6		
		18	13/4/19	Fertilizer application SOP	6		
		19	18/3/19	Accident / Health Screening	Entire		
		20	25/3/19	IPM awareness	10		
		21	8/1/19	Environmental Policy briefing	9		
		22	7/2/19	Scheduled waste-triple rinsing	10		
		23	7/1/19	Zero burning awareness	10		
		24	7/6/18	Chemical A.I justification	4		
		25	28/18	FFB grading - SOP	11		
		Landquest Estate					
			Date	Topic	Attendees		
		1	4/4/19	Stakeholder briefing /Fire Drill	44		
		2	26/3/19	Riparian Zone / Zero Burning	12		

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		3	7/3/19	HCV Wildlife monitoring	6	
		4	27/6/18	OSH Committee – Roles	1	
		5	12/6/19	OSH Self inspection SOP	9	
		6	22/3/19	EIA/ EAIA	2	
		7	21/3/19	Domestic waste 3R & Landfill	6	
		8	20/6/18	Gender committee – awareness	2	
		9	4/3/19	Road management - SOP	4	
		10	12/6/19	Safe handling of chemical	9	
		11	4/3/19	Road management - SOP	4	
		12	26/2/19	Accident Notification – First Aid usage	6	
		13	27/2/19	PPE Adherence - all activities	entire	
		14	4/4/19	Fire extinguisher inspection / fire dill	entire	
		15	28/2/19	Harvester safety	6	
		16	4/4/19	Company Policies– RSPO Awareness	entire	
		17	21/5/19	Spraying SOP – return of empty container	1	
		18	25/10/18	Fertilizer application SOP	7	
		19	18/3/19	Accident / Health Screening	entire	
		20	4/3/19	IPM awareness	4	

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21	26/3/19	Environmental Policy – buffer zone	12
22	26/3/19	Scheduled waste-triple rinsing	12
23	26/3/19	Zero burning awareness	12
24	27/5/19	Chemical A.I justification /mixing	2
25	28/4/18	FFB grading – SOP	11
26	22/4/19	Complaint & grievance – procedure	2
27	9/4/18	Workers Agreement & Salary deduction	Entire
28	20/6/18	Gender committee – awareness	2
29	4/3/19	Road management - SOP	4
LKSK Estate			
	Date	Topic	Attendees
1	11/4/19	Stakeholder briefing /Fire Drill	29
2	7/3/19	Riparian Zone / Zero Burning	8
3	29/4/19	HCV Wildlife monitoring	6
4	13/6/19	OSH Committee - Roles	6
5	25/4/19	OSH Self inspection SOP	7
6	6/3/19	EIA/ EAIA assessment	6
7	3/4/19	Domestic waste 3R Landfill management	8
8	29/4/19	Safe handling of chemical	6

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		9	29/4/19	SDS – Awareness	6
		10	18/3/19	Accident Notification	Entire
		11	21/5/19	PPE Adherence	8
		12	7/4/19	Fire extinguisher inspection	1
		13	12/2/19	PPE adherence – spraying	8
		14	16/4/18	Spraying SOP	7
		15	13/4/18	Fertilizer application SOP	8
		16	14/3/19	IPM awareness	8
		17	14/3/19	Environmental Policy briefing	8
		18	4/4/19	Scheduled waste-triple rinsing	6
		19	18/2/19	Zero burning awareness	7
		20	17/10/18	Supply chain - traceability	1
		21	28/4/18	FFB grading – SOP	11
		22	7/4/19	Quality awareness	6
		23	23/5/19	Return of empty container - SOP	1
		24	19/3/19	First Aid Kit – SOP	11
		25	5/3/19	Scheduled Waste & waste management	1
		26	5/3/19	Boundary markers/stone management	1
		27	7/3/19	Sexual harassment – Policy & guidelines	15

Criterion / Indicator		Assessment Findings				Compliance
		28	5/3/19	RSPO/MSPO awareness – record	3	
Principle 5: Environmental responsibility and conservation of natural resources and biodiversity						
Criterion 5.1: Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.						

<p>5.1.1</p>	<p>An environmental impact assessment (EIA) shall be documented. - Major compliance -</p>	<p>TSHR mill and estates has established its environmental aspects / impacts register associated with their activities. Estates having replanting program have prepared <i>Proposal For Mitigation Measures PMM</i> prior to commencement of replanting activities. Report for Landquest Estate was compiled by M/s <i>KiwiHeng Environmental Consultants Sdn Bhd</i> in October 2017 for proposed replanting of 370 ha. This for the submission to <i>Jabatan Perlindungan Alam Sekitar</i> (approved on 26/4/18) as required under the Sabah legislative requirement. The report therein comprised of the following elements;</p> <ul style="list-style-type: none"> a) General information <ul style="list-style-type: none"> - Project proponent - Scope of the PMM b) Project Description <ul style="list-style-type: none"> - Legal requirement - Project location and access - Project activities - Land status c) Existing Environment <ul style="list-style-type: none"> - Meteorology - Topography and hydrology - Geology / soil - Baseline water quality - Biological environment - Flora/fauna - Human environment d) Impact Prediction and Evaluation <ul style="list-style-type: none"> - Environmental impacts - Impact during development and operational stage - OSHA issues - Positive impacts e) Recommended Mitigation Measures 	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>The aspect and impact (EAI) which covers from upstream activities such as FFB reception until downstream processes was sighted during assessment. Identification and evaluation of environmental impact was completed for all activities and processes related to the mill operation. Among others the most significant environmental receptors are;</p> <ul style="list-style-type: none"> f) boiler stack emission which associated with air emission, palm oil mill effluent (POME) discharge g) land contamination which related to managing the schedule waste and general waste h) For the estate operation, all activities from harvesting, pest and disease, upkeep programme until delivery to mill has been identified. 	

<p>5.1.2</p>	<p>Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. - Minor compliance -</p>	<p>The management plan for the estate/mill significant impact has been illustrated in the <i>Environment Continual Improvement Plan 2015-2020</i>. Therein compiling the objectives, target, programs, PIC and timeline. Among others the management plan for the estates as shown below</p> <table border="1" data-bbox="1025 547 1823 1204"> <thead> <tr> <th></th> <th>Objective</th> <th>Target</th> <th>Program</th> <th>PIC</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>To minimise air pollution</td> <td>Continual</td> <td>Practice zero burning</td> <td>Mgr</td> </tr> <tr> <td rowspan="2">2</td> <td rowspan="2">To promote biodiversities safe from being poisoned/killed</td> <td>Continual</td> <td>To avoid banned chemical</td> <td></td> </tr> <tr> <td>Continual</td> <td>Implement IPM</td> <td>Mgr</td> </tr> <tr> <td>3</td> <td>To minimise land contamination through generation of SW</td> <td>Continual</td> <td>Manage and proper disposal to licensed buyer</td> <td>Mgr</td> </tr> <tr> <td>4</td> <td>Protect riparian zone /buffer zone</td> <td>Continual</td> <td>To avoid any activities at gazetted area</td> <td>Exec</td> </tr> <tr> <td>5</td> <td>Minimise erosion</td> <td>Continual</td> <td>Identify high slope area demarcate on map to exclude from any activities</td> <td>Mgr</td> </tr> </tbody> </table> <p>Similarly the mill adopted a management plan having details as shown below;</p> <table border="1" data-bbox="1025 1316 1823 1348"> <thead> <tr> <th></th> <th>Objective</th> <th>Target</th> <th>Program</th> <th>PIC</th> </tr> </thead> </table>		Objective	Target	Program	PIC	1	To minimise air pollution	Continual	Practice zero burning	Mgr	2	To promote biodiversities safe from being poisoned/killed	Continual	To avoid banned chemical		Continual	Implement IPM	Mgr	3	To minimise land contamination through generation of SW	Continual	Manage and proper disposal to licensed buyer	Mgr	4	Protect riparian zone /buffer zone	Continual	To avoid any activities at gazetted area	Exec	5	Minimise erosion	Continual	Identify high slope area demarcate on map to exclude from any activities	Mgr		Objective	Target	Program	PIC	<p>Complied</p>
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Criterion / Indicator		Assessment Findings				Compliance
		1	To reduce emission polluting the air	2019	Monitor boiler smoke density and upgrade boiler technology	Mgr
		2	To prevent CPO spillage contaminating the water drain	Continual	Identify and modify drainage flow	Mgr
		3	To improve management of SW & Domestic waste	Continual	To have competent person on SW management	Mgr
		4	To improve waste water treatment	Continual	To have competent officer in POME treatment	Exec
		5	Boundary noise to comply with DOE std	Continual	To measure boundary noise for compliances	Mgr
		6	Maintain GHG emission at below 400 mt CO2eq from processing power and outputs	2019	To spilt the monitoring energy use for process and domestic use.	Environ PIC
	Monitor rate of GHG release from the chimney.	Prod Engineer				

Criterion / Indicator	Assessment Findings	Compliance
<p>5.1.3</p>	<p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p> <p>- Minor compliance -</p> <p>KPOM – There was no changes made to the environmental aspects and impacts or current practices which require changes in the environmental action plans at the mill. Nevertheless, the existing environmental action plans had identified timeframes and responsible person at each operating unit assessed compiled in the <i>Environment Continual Improvement Plan 2015-2020</i> among others;</p> <ul style="list-style-type: none"> a) BOD final discharge b) Reduce water consumption. c) Reduce electricity consumption. <p>Estates - An environmental improvement plan was implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring protocol, which is adaptive to operational changes and is reviewed every year to reflect the results of monitoring operational changes that may have positive and negative environmental impacts. The <i>Environment Continual Improvement Plan 2015-2020</i> were reviewed on yearly basis and was verified at all visited operating units. Details of the management plan as per 5.1.2 above.</p>	<p>Complied</p>
<p>Criterion 5.2: The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and and operations managed to best ensure that they are maintained and/or enhanced.</p>		

<p>5.2.1</p>	<p>Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). - Major compliance -</p>	<p>The HCV assessment for the estates was conducted and compiled by <i>M/s Kiwiheng Environmental Consultants Sdn Bhd</i> K Kinabalu on Jan 2018 ref no KEC-(EV)/18/07, 18/08 and 18/09. The reports therein contained information relating to HCV identification and management. The details of the findings among others as summarised below.</p> <ul style="list-style-type: none"> a) Overview of HCV assessment b) Description of assessment area <ul style="list-style-type: none"> - Landscape context - biodiversity & conservation values - ecosystem service / social & cultural values c) HCV criteria & application to agriculture <ul style="list-style-type: none"> - Visual observation & supporting information - Wildlife in plantation - decision on HCV status d) HCV management / Monitoring. <p>The report is given in details to provide the existence of HCV, complete with photo and description The conservation and management of such identified areas are also detailed therein. The HCV areas presence as identified by the Estates within the CU are given below;</p> <table border="1" data-bbox="1025 1106 1809 1362"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">HC V</th> <th rowspan="2">Description</th> <th colspan="3">Estate</th> </tr> <tr> <th>Maju Sawit/ Wakuba</th> <th>Landquest</th> <th>LKSK</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>1.2</td> <td>Threatened & Endangered Species</td> <td>/</td> <td>/</td> <td>/</td> </tr> <tr> <td>2</td> <td>1.3</td> <td>Endemism</td> <td>/</td> <td>/</td> <td>/</td> </tr> </tbody> </table>		HC V	Description	Estate			Maju Sawit/ Wakuba	Landquest	LKSK	1	1.2	Threatened & Endangered Species	/	/	/	2	1.3	Endemism	/	/	/	<p>Complied</p>
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Criterion / Indicator		Assessment Findings				Compliance		
		3	4.2	Areas critical to soil erosion/sedimentation	/	/	/	
		4	4.3	Areas critical for fire prevention	/	/	/	
		5	5.0	Sites/resources local/ indigenous people	-	-	/	
		6	6.0	Cultural values critical to the traditional cultural identity of local community	-	-	/	
		<p>Note: LKSK estate have a shrine like structure called <i>Rumah Merah</i> where the community hold feast and offering of sort annually. The house is for everyone regardless of creed and ethnic or culture. Hence the HCV 6.0 has been declared.</p>						

5.2.2	<p>Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan. - Major compliance -</p>	<p>In records there is no RTE species except for <i>pygmy elephant discovered in P98A LKSK Estate field no P98E</i> observed/spotted within the member estates in CU. The HCVs areas are as per the listed in 5.2.1 above. Relevant action plans had been established and implemented as described in the management and monitoring of all the identified possible threat.</p> <table border="1" data-bbox="1025 587 1787 1342"> <thead> <tr> <th></th> <th>HCV area</th> <th>Possible threat</th> <th>Management & Monitoring</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Buffer zone</td> <td>Damage / erosion</td> <td>Provide a 10 meter buffer zone along the shared boundary</td> </tr> <tr> <td>2</td> <td>Riparian</td> <td>Damage /erosion</td> <td>Create riparian reserve on both sides of the river and its tributaries</td> </tr> <tr> <td>3</td> <td>Riparian</td> <td>Inadequate awareness</td> <td>Create awareness related to biodiversity conservation and environmental awareness annually</td> </tr> <tr> <td>4</td> <td>Flora/wildlife</td> <td>Inadequate information</td> <td>Record detection in log book and reviewed quarterly.</td> </tr> <tr> <td>5</td> <td>Riparian</td> <td>Damage /erosion</td> <td>Develop & implement management plan to reduce possible damage during replanting exercise</td> </tr> <tr> <td>6</td> <td>Riparian</td> <td>Inadequate detection</td> <td>Mapping boundaries of riparian zones</td> </tr> <tr> <td>7</td> <td>Riparian</td> <td>Fire risk</td> <td>Develop a plantation fire risk & control plan</td> </tr> </tbody> </table>		HCV area	Possible threat	Management & Monitoring	1	Buffer zone	Damage / erosion	Provide a 10 meter buffer zone along the shared boundary	2	Riparian	Damage /erosion	Create riparian reserve on both sides of the river and its tributaries	3	Riparian	Inadequate awareness	Create awareness related to biodiversity conservation and environmental awareness annually	4	Flora/wildlife	Inadequate information	Record detection in log book and reviewed quarterly.	5	Riparian	Damage /erosion	Develop & implement management plan to reduce possible damage during replanting exercise	6	Riparian	Inadequate detection	Mapping boundaries of riparian zones	7	Riparian	Fire risk	Develop a plantation fire risk & control plan	Complied
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Criterion / Indicator		Assessment Findings			Compliance	
		8	Riparian	Employees livelihood	Introduce development plans for workforce to elevate their standard of living	
		The entire above HCV conservation plan has been formalised in a management plan containing the time timeline and the PIC. This document has been sighted and verified.				
5.2.3	There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. - Minor compliance -	There were programs held by the estates /mill to all employees in pertaining to the awareness of HCV areas and RTE species. Interview with the employees concluded that training and briefing made during the ad hoc session and morning muster. This is also emphasized during the training held by QUESH programs. Employees are aware of the following measures;			Complied	
		<ul style="list-style-type: none"> 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 				
5.2.4	Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance -	There were programs held by the estates /mill to all employees in pertaining to the awareness of HCV areas and RTE species. Interview with the employees concluded that training and briefing made during the ad hoc session and morning muster. This is also emphasized during the training held by SQM programs. Employees are aware of the following measures;			Complied	
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Criterion / Indicator		Assessment Findings	Compliance
5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	There are no HCV set-asides with existing rights of local communities as observed and recorded from the interviews with the estates executives hence this indicator is not applicable.	Complied
Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.			

<p>5.3.1</p>	<p>All waste products and sources of pollution shall be identified and documented. - Major compliance -</p>	<p>All waste and pollution are identified and documented in the "<i>Waste Identification & Disposal Plan</i>" 2019 compiled by QESH Department. The waste and pollution generated from the mill operations as shown below;</p> <table border="1" data-bbox="1032 523 1733 820"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Scheduled waste</td> <td>Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries</td> </tr> <tr> <td>2</td> <td>Domestic waste</td> <td>rubbish from the mill complex and employees quarters</td> </tr> <tr> <td>3</td> <td>Industrial waste</td> <td>Fibre, palm kernel shell, boiler ash, scrap iron</td> </tr> </tbody> </table> <table border="1" data-bbox="1032 887 1733 1088"> <thead> <tr> <th></th> <th>Type of pollution</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Black smoke</td> <td>Emission from Boilers</td> </tr> <tr> <td>2</td> <td>Odour & gases</td> <td>Activities from the effluent treatment</td> </tr> <tr> <td>3</td> <td>Leakage of lubricant</td> <td>Storage & vehicle maintenance</td> </tr> </tbody> </table> <p>Similarly the estates have established and documented the waste sources and management in the "<i>Waste Identification & Disposal Plan</i>" 2019 compiled by QESH Department. Details as shown below;</p> <table border="1" data-bbox="1032 1251 1789 1313"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Location</th> <th>Management/Disposal Plan</th> </tr> </thead> <tbody> </tbody> </table>		Type of waste	Details	1	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries	2	Domestic waste	rubbish from the mill complex and employees quarters	3	Industrial waste	Fibre, palm kernel shell, boiler ash, scrap iron		Type of pollution	Details	1	Black smoke	Emission from Boilers	2	Odour & gases	Activities from the effluent treatment	3	Leakage of lubricant	Storage & vehicle maintenance		Type of waste	Location	Management/Disposal Plan	<p>Complied</p>
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Criterion / Indicator		Assessment Findings			Compliance	
		1	Domestic waste rubbish	Line sites, office, workshop, store,	Collection/disposal 2x/week handled by the respective estates using the internal rubbish disposal into a landfill.	
		2	Industrial waste-fertilizer bags	Empty bags store	Inventory of bags, reuse for LF collection, sell to appointed contractor	
		3	Scrap metal	workshop	Inventory maintained, tender at zone level for sale to licensed contractor.	
		4	SW 404 Clinical waste	clinic	Inventory maintained. Storage in sharp bin in clinic. Disposal through VMO clinic.	
		5	SW rags, plastics, filters	workshop	Inventory maintained. Storage in scheduled waste store. Disposal through licensed contractor.	
		6	Spent lubricant & hydraulic oil	workshop	Collection by SDI upon completion of maintenance.	
		7	Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW,	Scheduled waste store	Inventory maintained. Storage in SW store. All containers are labeled. Empty containers collected by authorized vendor..	

Criterion / Indicator	Assessment Findings	Compliance
5.3.2 All chemicals and their containers shall be disposed of responsibly. - Major compliance -	The scheduled waste store was assessed. The pesticide containers are disposed as scheduled waste. The scheduled waste collection consignment notes are reviewed to confirm the disposal of the pesticide containers are according to the best practice. Pesticide containers are also reused as premix containers. Any of the pesticide containers that are to be disposed are triple rinsed and punctured.	Complied

Criterion / Indicator		Assessment Findings	Compliance												
5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -	<p>The action plans to reduce the pollutions are shown below;</p> <table border="1"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Black smoke</td> <td>-To monitor the condition of dust cyclone every 3 months -To carry out boiler furnace cleaning every week -To ensure complete furnace combustion by using correct fuel ratio</td> </tr> <tr> <td>2</td> <td>Odour & gases</td> <td>-To maintain proper feeding into digestion process of effluent to prevent severe and unpleasant odour - Maintain 1:1 ratio of acidification process</td> </tr> <tr> <td>3</td> <td>Leakage of lubricant</td> <td>-Ensure SOP to be strictly followed -To place all lubricant oil drum on metal trays</td> </tr> </tbody> </table> <p>All efforts and action plans for the identified pollutants and emission above are adequate to comply with the requirement. All identified issues have significant impacts to the environment. The mill also monitored and maintained records on Palm GHG. This compilation is made at Head Office level and made for the entire SOU. Inclusive in the report are;</p> <ul style="list-style-type: none"> a) Plantation/field emission (%) <ul style="list-style-type: none"> - data from field emission and sinks (CO2/FFB) b) mill emission (%) <ul style="list-style-type: none"> - -data from mill emission and credits (CO2/FFB) 		Type of waste	Action Plan	1	Black smoke	-To monitor the condition of dust cyclone every 3 months -To carry out boiler furnace cleaning every week -To ensure complete furnace combustion by using correct fuel ratio	2	Odour & gases	-To maintain proper feeding into digestion process of effluent to prevent severe and unpleasant odour - Maintain 1:1 ratio of acidification process	3	Leakage of lubricant	-Ensure SOP to be strictly followed -To place all lubricant oil drum on metal trays	Complied
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<p>Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>															

Criterion / Indicator		Assessment Findings	Compliance																				
5.4.1	<p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored.</p> <p>- Minor compliance -</p>	<p>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. The use of energy in palm oil mill and line site was monitored monthly to compare the energy usage against the production of FFB. Diesel usage recorded according to transportation vehicles and operation vehicles. The following average consumption diesel/FFB mt for 2018 as shown below;</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>Diesel L</th> <th>FFB mt</th> <th>Diesel/FFB</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Maju sawit</td> <td>5686</td> <td>3106</td> <td>1.9</td> </tr> <tr> <td>2</td> <td>LKSK</td> <td>166515</td> <td>22104</td> <td>8.0</td> </tr> <tr> <td>3</td> <td>Landquest</td> <td>91000</td> <td>4337</td> <td>22.27</td> </tr> </tbody> </table> <p>Landquest Estate recorded higher ratio due to replanting program in progress and also overall the estates possessed gen-set for power generation. Both the mill and estates adopted the following practices for the optimization of the dieseline;</p> <ul style="list-style-type: none"> a) Tractors/Vehicles engine OFF when not in use b) All lights office electrical appliances OFF when not functioning c) All vehicles to follow the recommended preventive maintenance d) Leakages of machine/vehicles to be attended without delay. 		Estate	Diesel L	FFB mt	Diesel/FFB	1	Maju sawit	5686	3106	1.9	2	LKSK	166515	22104	8.0	3	Landquest	91000	4337	22.27	Complied
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<p>Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.</p>																							

Criterion / Indicator		Assessment Findings	Compliance
5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -	None observed at on-going replanting areas at Landquest and LKSK estate as the estate management observed the below established procedure. TSH Resources Bhd. has established Environmental Policy that covers prohibition of use of fire for clearing of land and open burnings (Zero Burning. Refer doc no. TSHR/POL/SPO08 rev no. 1 under clause 7B dated 1/11/2017.	Complied
5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -	None observed. See comments above in Indicator 5.5.1	Complied
Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			

<p>5.6.1</p>	<p>An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -</p>	<p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records dated 01/9/2015 which covers estates and mill activities / operation. 'Environment Continual Improvement Plan 2015-2020' – is used to identify the waste products and sources of pollution was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations were:</p> <ul style="list-style-type: none"> a) Air emissions –from boiler stack (smoke and particulate), vehicle and generator (smoke and gases), GHG emission from anaerobic processes (ETP, EFB dumping). b) Water discharges – Cleaning water / run-off / process station waters (hydrocyclone / sterilizer condensate/clarification waste) and boiler quenching water and blow down. c) Land – Scheduled waste, domestic waste and industrial/process waste. d) Clinical wastes – generated from clinics. <p>Kunak POM has conducted boiler stack sampling for each of the boiler stack. The monitoring was carried out by <i>REHPRO SCIENTIFC SDN BHD</i>. Results ref no 03/4/19 for boiler are as follows;</p> <ul style="list-style-type: none"> a) Boiler no 1 – 0.324g/NM3 b) Boiler no 2 – 0.340g/NM3 <p>Limit has been reduced to 0150g/NM3 under <i>PUB 2014 (Peraturan Udara Bersih)</i> and all millers were provided with a grace period of 5 years for compliance. The mill was also equipped with a Continuous Emission Monitoring System (CEMS). The Boiler has a minimum operation due to the steam supply being made by the Group Power Plant.</p>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> a) The audit team has verified the condition of the CEMS during the audit. b) The system was found to be in functional condition. 	
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	Kunak Mill and the estates within the CU had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation. <ul style="list-style-type: none"> a) The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adverse impact the environment. b) Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report 	Complied
5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -	Details of the GHG calculation as provided in the appendix K. The version of 3.0 is being used for the compilation.	Complied
Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.			
Criterion 6.1: Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.			

Criterion / Indicator		Assessment Findings	Compliance
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	Latest stakeholder meeting was done as following: i) External Stakeholder Meeting; Dated 11/4/2019; Venue: EPP Meeting Room. The meeting amongst all was attended by vendor/supplier/service provider as well as local communities among neighbouring estate representative, village head, school teacher and local authorities. ii) Internal Stakeholder Meeting; Dated 4/4/2019; Venue: LKSK Estate. Other internal stakeholder meeting done including Gender meeting LKSK Estate conducted on 13/6/2019 and Welfare Committee (Workers Representative) meeting on 13/6/2019.	Complied
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	Assessment confirmed has been done with participation of affected parties as per evidence sighted including the following: - Minutes of Meeting; External Stakeholder Meeting; Date: 11/4/2019 - Kunak POM & Maju Sawit Estate Internal Stakeholder Meeting Year 2019; Date: 1/4/2019 Landquest Sawit Estate Internal Stakeholder Meeting Year 2019; Date: 4/4/2019	Complied
6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -	Social management action plan established as Social Continual Improvement Plan; Rev. # 2; Date: 8/4/2019; Operating Unit: KPOM, Maju Sawit, Wakuba, LKSK & Landquest. Among programs established including the following: - To ensure the work & pay conditions are achieve minimum stanrard of Labour Law: Jan-19 - "Rumah Merah" at LKSK Estate: Feb-18 - Bus stop at entrance of Landquest Estate: Apr-18 Recreation areas along Sungai Ulu Kalumpang and Sungai Mantri at LKSK: Apr-18	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	The plan was being monitored periodically through stakeholder meeting and survey using the survey form (Internal Stakeholder List-Census; Rev. # 0; Date: 9/4/2019) also known. Sighted the latest survey was conducted on 9/4/2019.	Complied
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	No smallholder schemes included in TSH.	Not applicable
Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.			
6.2.1	Consultation and communication procedures shall be documented. - Major compliance -	Documented consultation and communication procedure is available in place, TSHR/RSPO/SOP02, Rev1. Sighted process flow for communication & consultation.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
6.2.2	<p>A management official responsible for these issues shall be nominated.</p> <p>- Minor compliance -</p>	<p>KPOM & Maju Sawit Estate:</p> <p>Appointment of Grace Gadung Baru (Quality Engineer) as per Letter of Appointment Social Officer; Date: 22/4/2019</p> <p>Landquest Estate:</p> <p>Appointment of Edy Aziz (Field Supervisor) as Social Officer as per Letter of Appointment Social Officer; Date: 7/3/2018</p> <p>LKSK Estate:</p> <p>Appointment of Rahman Beddu Rahim (Field Staff) as Social Officer as per Letter of Appointment Social Officer; Date: 7/3/2018</p>

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Criterion / Indicator	Assessment Findings	Compliance
<p>6.2.3 A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -</p>	<p>List of stakeholders maintained updated as per following: - Internal Stakeholder List; Rev. # 0; Date: 9/4/2019 - External Stakeholder List; Rev. # 0; Effective date: 23/5/2019</p> <p>Records of communication maintained as per procedure for Information Request; Doc. # TSHR/SUST/SOP01; Rev. # 2; Date: 1/11/2017. Recorded in Stakeholder Registration Form; From Student of SMK Balung on Information Request for Pentaksiran Tingkatan 3 (PT3) Tahun 2018; Kajian Lapangan Pelbagai Instrumen Sejarah (Letter Ref. # SMKBT/3053/400-07/04/01; Date: 20/4/2018) Borang Komplek & Keluh Kesah (Employee Grievance Report; Rev. # 0; Date: 1/4/2019); as per sample grievance on Utility Supervisor by Utility Operator; dated 29/5/2019 and received by AGM on 10/6/2019 – resolved within 1 week as per procedure with feedback to complainant shown acceptance by complainant confirming issue resolved.</p> <p>Also Utility Department Request Repair or Maintenance Form / Borang Permohonan Penyelenggaraan Pembaikan latest shown report on repair of long light at 2 rooms for house number ML-1; dated 2/12/2018</p> <p>Borang Komplek & Keluh Kesah by workers housing chief Haris Majid requesting electricity during Hari Raya Festive Season on 4/6/2019 5pm-12am; 5/5/2019 6am-11am, 2pm-5pm & 6pm-12am; 6/6/2019 2pm-5pm & 6pm-12am. Normal daily genset operating hours was 6pm-10pm & 4am-6am.</p>	<p>Complied</p>
<p>Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.</p>		

Criterion / Indicator		Assessment Findings	Compliance
6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance -	The system implemented based on following procedures: i) Information Request; TSHR/SUST/SOP01; Rev.: 2; Effective date: 1/11/2017 Employee grievance; TSHR/HR/SOP06; Rev.: 0; Effective date: 12/1/2016	Complied
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –	Based on procedures, sighted records of Stakeholder Registration Form that was used for Information Request by external stakeholders during external stakeholder meeting as per minutes of meeting. Sighted also records of Employee Grievance Report Form; TSH/GHR/1016/068 (Ver. 2) that was used for any complaints or grievance by mostly internal stakeholders sampled as following: Employee Grievance Report; TSH/GHR/1016/ 068 (Ver. 2) as per sample grievance on stray dogs within housing area issue; dated 12/7/2018 and resolved on 17/7/2018.	Complied
Criterion 6.4: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	Procedure to identify legal and customary rights also people entitled to compensation has been established- titled Legal, Customary Rights & Compensation, TSHR/RSPO/SOP03; Rev. 1. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders sighted at time of audit.	Complied

Criterion / Indicator	Assessment Findings	Compliance
6.4.2	<p>A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land.</p> <p>- Minor compliance -</p>	<p>Procedure to identify legal and customary rights also people entitled to compensation has been established- titled Legal, Customary Rights & Compensation, TSHR/RSPO/SOP03; Rev. 1. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders sighted at time of audit.</p>
6.4.3	<p>The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available.</p> <p>- Major compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders sighted at time of audit.</p>
<p>Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.</p>		

<p>6.5.1</p>	<p>Documentation of pay and conditions shall be available. - Major compliance -</p>	<p>Mill and estates have employed local and foreign workers. All the mill and estates workers are under direct and super's mandore employment. The role of super mandore is the contractor that supervise the workers who employed by TSH. The payslip has included basic pay, allowances, working days, deduction of salary and overtime. Payslip for June 2018, October 2018, January 2019</p> <p>All the sampled workers have achieved the Minimum Wage Order 2016 and Minimum Wage Order 2018.</p> <p>Documentations available as per following: Mill sample sighted as following: - Employee # 03-0050; Work station: Shovel Driver; Agreement date: 1/12/1997; Nationality: Indonesia - Employee # 01-0345; Work station: Weighbridge Clerk; Agreement date: 14/5/2007; Nationality: Indonesia - Employee # 05-0138; Work station: General Worker; Agreement date: 11/6/2000; Nationality: Indonesia - Employee # 03-0370; Work station: Clarification; Agreement date: 1/12/2007; Nationality: Indonesia - Employee # 05-0859; Work station: Security guard; Agreement date: 1/4/2014; Nationality: Malaysia Maju Sawit Estate sample sighted as following: - Employee # 01-0470; Work station: Harvester; Agreement date: 2/10/2015; Nationality: Indonesia - Employee # 01-0029; Work station: Harvester; Agreement date: 7/10/1998; Nationality: Indonesia - Employee # 01-0166; Work station: Watchman; Agreement date: 15/3/2003; Nationality: Indonesia - Employee # 01-0199; Work station: Weeder; Agreement date: 21/5/2004; Nationality: Indonesia Landquest Estate sample sighted as following:</p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - Employee # 02-0619; Work station: Harvester; Agreement date: 13/11/2010; Nationality: Indonesia - Employee # 01-0675; Work station: Harvester; Agreement date: 1/9/2015; Nationality: Indonesia - Employee # 02-0744; Work station: Sprayer; Agreement date: 22/5/2017; Nationality: Indonesia - Employee # 02-0637; Work station: Sprayer; Agreement date: 18/4/2011; Nationality: Indonesia <p>Employee # 01-0562; Work station: Creche Ayah; Agreement date: 1/7/2009; Nationality: Indonesia</p> <p>LKSK Estate sample sighted as following:</p> <ul style="list-style-type: none"> - Employee # 11-0813; Work station: Loose Fruit Collector; Agreement date: 11/9/2007; Nationality: Indonesia - Employee # 11-1602; Work station: Loose Fruit Collector; Agreement date: 9/8/2016; Nationality: Indonesia - Employee # 06-1606; Work station: Harvester; Agreement date: 2/1/2019; Nationality: Indonesia - Employee # 03-1304; Work station: Sprayer; Agreement date: 15/3/2018; Nationality: Indonesia - Employee # 02-1558; Work station: Harvester; Agreement date: 29/8/2017; Nationality: Indonesia 	

Criterion / Indicator	Assessment Findings	Compliance
<p>6.5.2</p>	<p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p>- Major compliance -</p> <p>Working hours is 8 hours. From Monday to Saturday. Total monthly working hours is 208 hours. The overtime maximum is 104 hours according to the Sabah Labour Ordinance 2005.</p> <p>As at current status, there was none has crossed 80 hours of overtime. Verified the payslips, the payment and calculation of overt time well distributed.</p> <p>The overtime rate after 8 hours daily rated is: upkeeping</p> <ul style="list-style-type: none"> - Mon - Sat – daily rated / 8 hours x 1.5 - Sunday - daily rated / 8 hours x 2.0 - Public holiday – daily rated / 8 hours x 3.0 <p>The overtime rate after 8 hours piece rated is: harvesters</p> <ul style="list-style-type: none"> - Mon - Sat – flat rate - Sunday – flat rate x 2.0 <p>Public holiday – flat rate x 3.0</p>	<p>Complied</p>

<p>6.5.3</p>	<p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. - Minor compliance –</p>	<p>The standard of housing provided for workers and their families meets the basic requirements of the government regulations, Act 446 Workers’ Minimum Standards Of Housing And Amenities Act 1990(as a guide). However, company need to demonstrate its stance related to any unauthorized permanent or temporary structure constructions and renovations or extension of existing company's houses whether allowed or not.</p> <p>Kunak Mill & Maju Sawit Estate: TSH Mill and estates has provided the minimum basic housing facilities. Electricity is subsidized and water is supplied at no charge. Water to housing was self-treated water where the treated water undergoes monitoring by the mill management. Housing area inspection conducted by Medical Assistant on weekly basis. Sighted the inspection form (Borang Pemeriksaan Perumahan, Dewan Komuniti Pusat Jagaan Kanak-kanak & Sekolah; Form # TSHR/CL/F14; Rev. # 1; Date: 1/8/2018) for Week 2 of May 2019 (11/5/2019) shown comment by MA on water cleanliness which found a bit turbid## other consistent comments on Week 1, 2 & 4 May 2019: - Water found bit turbid - Stray dogs number kept on increased - Limited availability of dustbin in housing area Drinking water sampling Certificate of Analysis # 20190124-05B-0; Date: 19/2/2019 by Dynakey Laboratories Sdn. Bhd. Shown colour results was at 17 and alum at 2.7 against Drinking Water Quality Standard of 15 and 0.2 respectively. Housing visit found “hanging concrete drain” in-front of mill housing # ML1B not being attended. Landquest Estate:</p>	<p>Minor nonconformance</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<p>Landquest estate has provided the minimum basic housing facilities. Electricity supplied through genset and water supplied from hill water. Drinking water sampling Certificate of Analysis # 20190124-07B-0; Date: 19/2/2019 by Dynakey Laboratories Sdn. Bhd. Shown colour results was at 16 and NTU at 6.8 against Drinking Water Quality Standard of 15 and 5 respectively. Latest weekly housing inspection done on 14/6/2019 and 7/6/2019.</p> <p>LKSK Estate: LKSK estate has provided the minimum basic housing facilities. Electricity supplied through genset and water supplied from hill water. Drinking water sampling Certificate of Analysis # 20190124-06B-0; Date: 19/2/2019 by Dynakey Laboratories Sdn. Bhd. Shown colour results was at 20 and NTU at 10 against Drinking Water Quality Standard of 15 and 5 respectively. Latest weekly housing inspection done on 14/6/2019 and 8/6/2019.</p> <p>#Water Quality Standard base on National Standard for Drinking Water Quality, 2nd Version, January 2004 by Engineering Services Division, Ministry of Health, Malaysia.</p> <p>Due to issues found above, a minor noncompliance has been raised.</p>	
6.5.4	<p>Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance –</p>	<p>Access to food for the workers are considered adequately and sufficiently provided through provision shops available in each estate and mill site. Sighted canteens/provision shops at estates and mill. Reviewed current prices monitored by the company on monthly basis and interview with local staff and foreign staff indicated that the services / food prices at the canteen and shops were convenient and affordable.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
Criterion 6.6: The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	Policy on Freedom of Association is in place dated 16/10/2015. Policy reflected the Work Act 1955. Procedure Equal Opportunity & Discrimination, TSH/POL/SOP03, Rev0 in place.	Complied
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	In absence of union representation, workers form a welfare committee and latest Welfare Meeting was conducted on 24/04/2019.	Complied
Criterion 6.7: Children are not employed or exploited.			
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	The minimum working age is 16 under the National Labour Law as well as Sabah Labour Ordinance. Company policy is to only hire persons over the age of 18. This is reflected in the Procedure Child Labour, TSHR/POL/SOP07; Rev. 0. Malaysian workers have to provide ID card - foreign workers provide passports. Inspection of employment records confirmed checks are made of staff and worker age before hiring. During field visit, children were not seen at any of the working place at both mill and estates. Interview with workers confirmed the understanding of company policy on children workers.	Complied
Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.			

Criterion / Indicator		Assessment Findings	Compliance
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	A policy on equal opportunity available and displayed at the offices along with the other policies. Policy is known as the Equal Opportunity & Discrimination. Policies were in dual language (English & Malay).	Complied
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	Foreign workers are with contracts on a 1 year review. Local workers are on a long term employment. There were no discrimination sighted at time of audit. Job opportunities and amenities such as free housing, water and electricity supplies, medical care are given to all employees without discrimination. All employees are aware of the grievance procedures / flow through the various Committees such as Gender Committee for women, foreign workers representation and worker’s leader (representative), Welfare Committee to highlight their concerns and grievances if any. No grievances were highlighted to the audit team by internal and external stakeholders. Issues raised were channelled through complaint forms submitted to the mill and estate management for further actions.	Complied
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	Recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. It was noted during the audit that there is no discrimination based on nationality, race, gender and age. Foreign workers were accepted upon completion of medical tests and positive results from FOMEMA.	Complied
Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.			

Criterion / Indicator		Assessment Findings	Compliance
6.9.1	Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	<p>Policy on protection against Sexual Harassment available and made aware to all the women representatives at the Gender Committee meetings.</p> <p>There is no any reported case of harassment in the operating units. A combined operating units Women Association Committee meeting was conducted on 9/4/2019 mainly as part of the implementation and communication medium on sexual harassment prevention among women employees. Awareness among the rest of employees also provided through Welfare Committee (Workers Representative) meeting on 24/04/2019.</p>	Complied
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	<p>Reproductive rights of the female workers are protected. Female employees are aware that they are entitled for two months paid maternity leave. Entitlement is same for both local and foreign workers.</p> <p>Revised policy on 21/3/2016 TSHR/POL/SOP06.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>6.9.3</p> <p>A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>TSH has developed a Procedure for Sexual Harassment, TSHR/HR/SOP05; Rev. 0 as guidance for gender committee. Method of complaint is in place and the Form- Sexual Harassment Action Form.</p> <p>Sites were headed by Gender Committee representatives and supported by the respective management at sites. Committees were known as Women Committee and were supported by the TSH management.</p> <p>Latest gender committee meeting was done as following: i) Gender meeting KPOM & Maju Sawit conducted on 9/4/2019 ii) Gender meeting Landquest & LKSK Estate conducted on 18/3/2019</p> <p>No negative issues were highlighted during the meetings. Proposals for women improvements were discussed for benefits of families, children immunisation and housing environment.</p>	<p>Complied</p>
<p>Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.</p>		
<p>6.10.1</p> <p>Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available.</p> <p>- Minor compliance -</p>	<p>Purchase of oil palm fruit from external parties is arranged by the TSH Management As per notification memo by Marketing Department displayed on weighbridge:</p> <p>- Memo date: 3/6/2019; May 2019 FFB trade price = RM 296/mt Memo date: 2/5/2019; April 2019 FFB trade price = RM 312/mt</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
6.10.2	<p>Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation).</p> <p>- Major compliance -</p>	Complied
6.10.3	<p>Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.</p> <p>- Minor compliance -</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	<p>Review on payment records found all payment was made in timely manner. This was further verified during interviews with the respective stakeholders that were contractors, re-planters, transportations, spare-parts, hardware.</p> <p>Evidence obtained during the review shown all payments were timely disperse through cheque payments and internet banking (whichever preferred by the service providers/vendors) as per following sample FFB Final Payment:</p> <ul style="list-style-type: none"> - FFB Supplier: Muis Melewar Plantations Sdn. Bhd.; P/I # PI32804; Date: 16/4/2019 - FFB Supplier: Onngiap Plantations Sdn. Bhd.; P/I # PI32787; Date: 10/4/2019 - FFB Supplier: Jinka Bharu Holdings Sdn. Bhd.; P/I # PI32722; Date: 12/4/2019 	Complied
Criterion 6.11:			
Growers and millers contribute to local sustainable development where appropriate.			
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	<p>LKSK Estate has developed Corporate Social Responsibility Gantt Chart dated 29/3/2018 to plan the CSR to be conducted throughout 5-years. For eg: donation to school, collaborate with MPOB to train local villagers and stakeholders on Good Agricultural Practice, friendly matches and health care campaign.</p> <p>Landquest Estate has provided free school bus to send the children to school outside the plantations. Both estates have provided free water and electricity supply to all the workers staying in the plantation.</p>	Complied
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	No scheme smallholders within TSH certification unit.	Not applicable

Criterion / Indicator		Assessment Findings	Compliance
Criterion 6.12: No forms of forced or trafficked labour are used.			
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	The company has recruited all the employees with legal identification for local and valid passport and work permit for foreign workers. Contract of employment was signed by the workers prior to work. Sampled of foreign workers with valid work permit as sighted as per indicator 6.5.1 above.	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	No any contract substitution occurred among TSH workers.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	A Special Labour Policy; Doc. # TSHR/POL/SOP10; Rev. # 2; Date: 26/11/2018 was established and implemented mainly for any foreign workers working under TSH Group in Sabah.	Complied
Criterion 6.13: Growers and millers respect human rights.			
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	The Human Rights & Responsible Business Policy; Doc. no.: TSHR/POL/SOP09 Rev. 0 dated 16/10/2015 was signed by MD and communicated through internal stakeholder meeting, assembly and etc.	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	TSH Management has set up the school facility (Community Learning Centre-CLC) within the estate's compound for foreign workers children. Contributions include tables/chairs, toilets, water supply, lights, fans and gated compound. An assistant teacher is allocated to the school to support the teacher from CLC.	Complied
Principle 7: Responsible development of new plantings (if applicable)			
Kunak Palm Oil Mill Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during the annual surveillance assessment. The immature areas are replanted area.			
Principle 8: Commitment to continual improvement in key areas of activity			
Criterion 8.1: Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.			
8.1.1	<p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); • Optimising the yield of the supply base. <p>- Major compliance -</p>	<p>Example of continuous improvement plan verified against budget at KPOM certification unit are:</p> <ul style="list-style-type: none"> • Reduce usage of pesticides by implementing IPM such as the increase in the planting of nectariferous beneficial plants. • Application of fertilizer as per Agronomist recommendation • Planned installation of Electrostatic Precipitator in 4 quarter 2019 	Complied

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Appendix B: Approved Time Bound Plan

RSPO Certification of TSH Mills and Supply bases						
Companies	2016	2017	2018	2019	2020	2021
Malaysia						
TSH Plantation Management Sdn Bhd			Kunak POM & Maju Sawit Estate	Sabahan POM		
TSH Resources Berhas		Gomantong Estate ¹				
TSH Palm Products Sdn Bhd		OYH Estate ¹				
TSH Holding Sdn Bhd			Wakuba Estate ²			
LKSK Sdn Bhd			LKSK Estate ²			
Landquest Sdn Bhd			Landquest Estate ²			
TSH Plantations Sdn Bhd		Lahad Datu POM ¹		Sabahan Estate ³		
RT Plantations Sdn Bhd				RT Estate ²		
Indonesia						
PT Andalas Agro Industri		AAI POM ⁵				
PT Laras Internusa		LIN Estate ⁵				
PT Andalas Wahana Berjaya						
PT Sarana Prima Multi Niaga	SPMN POM ⁴ & SPMN Estate ⁴					
PT Mitra Jaya Cemerlang					MJC Estate ⁴	
PT Farinda Bersaudara			FDB POM ⁶ & FDB Estate ⁶			
PT Teguh Swakarsa Sejahtera			TSS Estate ⁶			
PT Munte Waniq Jaya Perkasa				MWJP Estate ⁶		
PT Perkebunan Sentawar Membangun						PSM Estate ⁶
PT Bulungan Citra Agro Persada						BCAP POM* & BCAP Estate
PT Andalas Wahana Sukses						AWS POM* & AWS Estate
<p>Note: Superscript 1 supplies to Lahad Datu POM. Superscript 2 supplies to Kunak POM. Superscript 3 supplies to Sabahan POM. Superscript 4 supplies to SPMN POM. Superscript 5 supplies to AAI POM. Superscript 6 supplies to FDB POM. Note: * (Asterisk) Indicates POM not yet built. Note: This schedule may be subject to change but we will endeavour to keep the final schedule as close as possible to what appears here.</p>						

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2018 for Kunak Oil Mill and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

- i. Estates area planted data
- ii. Fuel consumed
- iii. Mill datas include CPO produced, PKO Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in 2018 for Kunak Palm Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	-0.28
PKO	0

Extraction	%
OER	19.37
KER	5.19

Production	t/yr
FFB Process	445,269.53
CPO Produced	86,256.79
PKO Produced	0

Land Use	Ha
OP Planted Area	1,478.50
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	20.04
Total	1,498.54

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	9431.21	0.32	0	0	0	0	9431.21	0.32
CO ₂ Emission from fertilizer	1640.32	0.06	0	0	0	0	1640.32	0.06
NO ₂ Emmision	2613.62	0.09	0	0	0	0	2613.62	0.09
Fuel Consumption	399.29	0.01	0	0	0	0	399.29	0.01
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-10457.05	-0.35	0	0	0	0	-10457.05	-0.35
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	3627.4	0.12	0	0	0	0	3627.4	0.12

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	11293.41	0.03
Fuel Consumption	235.78	0
Grid Electricity Utilisation	0	0
Credit		
Export of Grid Electricity	-2.43	0
Sales of PKS	-43910.24	-0.1
Sales of EFB	-2110.92	0
Total	-34494.4	-0.08

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
PK from own mill	-6524.66
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	0
Divert to methane captured (flaring) (%)	30
Divert to methane captured (energy generation) (%)	70

Appendix D: General Chain of Custody Requirements for the Supply Chain

Requirement		Evidence	Compliance (Yes/No/N/A)						
5.1 Applicability of the general chain of custody requirements for the supply chain									
5.1.1	The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.	Kunak POM has the physically handle the RSPO Certified Sustainable oil palm products. All trading, contract and sales are managed by Sales department at HQ.	Yes						
5.1.2	Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.	Kunak POM is not a trader or distributor.	Yes						
5.1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.	Company info available through RSPO IT Platform as following: <table border="1" data-bbox="1137 1002 1926 1157"> <tr> <td>Member Name</td> <td>TSH Plantation Management Sdn Bhd (Kunak Palm Oil Mill)</td> </tr> <tr> <td>Member ID</td> <td>RSPO_PO1000007786</td> </tr> <tr> <td>RSPO Membership Number</td> <td>1-0173-14-000-00 (TSH Resources Berhad)</td> </tr> </table>	Member Name	TSH Plantation Management Sdn Bhd (Kunak Palm Oil Mill)	Member ID	RSPO_PO1000007786	RSPO Membership Number	1-0173-14-000-00 (TSH Resources Berhad)	Yes
Member Name	TSH Plantation Management Sdn Bhd (Kunak Palm Oil Mill)								
Member ID	RSPO_PO1000007786								
RSPO Membership Number	1-0173-14-000-00 (TSH Resources Berhad)								
5.1.4	Processing aids do not need to be included within an organization's scope of certification.	No processing aids needed and included within Kunak POM scope of certification.	Yes						
5.2 Supply chain model -									

5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	The Palm Oil Mill receives and process both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified Products.	Yes
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Kunak Palm Oil Mill is certified with Mass Balance Module.	Yes
5.3. Documented Procedures			
5.3.1	The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: <ul style="list-style-type: none"> Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. 	Written documented procedures was established; Supply Chain; Doc. # TSHR/SUST/SOP05; Rev. # 2; dated 1/11/2018 with Mass Balance (MB) model covering all the RSPO Supply Chain Certification Standard and Traceability for handling certified and noncertified FFB.	Yes
	<ul style="list-style-type: none"> Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 	Records of Todate FFB Received 2017/2018 for FFB received from both certified and non-certified source sighted available. Other than own supplying estates (Maju Sawit, Landquest & LKSK), external suppliers including the sample sighted as following: <ul style="list-style-type: none"> - Sri Tanjung Mesra Sdn. Bhd. - Sabak Plantation Sdn. Bhd. - Rahmah binti Saying - Atur Jadi May 2018 – Apr 2019: Total FFB received: 442,124.01 mt Certified FFB: 18,820.81 mt Uncertified FFB: 415,159.88 mt Total FFB processed: 442,124.01 mt	Yes

		Total CPO produced: 84,395.77 mt Total PK produced: 23,544.39 mt Total CPO despatched: 84,316.06 mt Total PK despatched: 22,374.15 mt	
	<ul style="list-style-type: none"> Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization's procedures for the implementation of this standard. 	The Chief Clerk (Beche Sahibe) has been appointed as the Supply Chain Person In-Charge as per letter dated 14/3/2018. The MB model is used because certified and noncertified (OCP crop) FFB is received and processed at Kunak Palm Oil Mill.	Yes
5.3.2	The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.	<p>Audit conducted based on procedures as following:</p> <ul style="list-style-type: none"> - Corrective & Preventive Action; Doc. # TSHR/QD/SOP05; Rev. # 1; Effective date: 30/11/2018 - Audit; Doc. # TSHR/QD/SOP03; Rev. # 2; Effective date: 31/05/2018 <p>Records shown audit was conducted on 11-13/2/2019 as per sighted Audit Plan; Form # TSHR/QD/F06; Rev. # 1; Effective date: 23/3/2016 and Internal Audit Checklist (Based on RSPO Supply Chain Certification Standard); Form # TSHR/SUST/F05; Rev. # 0; Effective date: 30/5/2018. SCCS internal audit was conducted together with RSPO P&C and MSPO internal audit.</p>	Yes
	ii) Effectively implements and maintains the standard requirements within its organization.	No any findings raised under SCCS implementation except for RSPO P&C & MSPO only.	Yes
5.4. Purchasing and goods in –			
5.4.1	The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:	<p>Implementation was based on FFB Purchase procedure; Doc. # TSHR/PR/SOP03; Rev. # 1; Effective Date: 19/2/2018.</p> <p>Sample internal certified FFB received:</p>	Yes

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<ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number 	<ul style="list-style-type: none"> - Supplier: Landquest Estate; W/bridge ticket # 354257; Date: 4/4/2019; GRN # 354204; Nett weight: 11,670kg; Vehicle # SS6005P - Supplier: Maju Sawit Estate; W/bridge ticket # 354225; Date: 4/4/2019; GRN # 354172; Nett weight: 4,600kg; Vehicle # ST3863N <p>Sample external uncertified FFB received:</p> <ul style="list-style-type: none"> - Supplier: TSH Bukit Tajam Collecting Centre; W/bridge ticket # 345167; Date: 12/1/2019; GRN # 345114; Nett weight: 25,990kg; Vehicle # ST9637M - Supplier: TSH Bukit Tajam Collecting Centre; W/bridge ticket # 345698; Date: 17/1/2019; GRN # 345645; Nett weight: 18,350kg; Vehicle # SS9496J 	
<ul style="list-style-type: none"> • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). 	<p>The daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit.</p>	<p>Yes</p>
<ul style="list-style-type: none"> • The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance. 	<p>Based on Procedure and transaction records available, the site receiving RSPO certified oil palm products were ensured the RSPO certification status are verified. All transactions were confirmed through PalmTrace website.</p>	<p>Yes</p>
<ul style="list-style-type: none"> • A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked 	<p>Based on Procedure and transaction records available, the site receiving RSPO certified oil palm products were ensured the RSPO</p>	<p>Yes</p>

	via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements.	certification status were verified. All transactions were confirmed through PalmTrace website.	
	<ul style="list-style-type: none"> The validity of license for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements. 	Not applicable.	N/A
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	Mechanism in place for handling nonconforming oil palm products and/or documents was describe in the procedure available. No non-conforming products recorded since last audit.	Yes
5.5. Outsourcing activities –			
5.5.1	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p>	Outsource only involved transportation of products, i.e. CSPO and CSPK, subjected to the buyers’ contractual requirements either ex-mill or delivered. Mostly delivered contracts involved CSPO and and ex-mill involved CSPK. Implementation for CSPO was based on the procedure Crude Palm Oil (CPO); Doc. # TSHPOM/LB/SOP01; Rev. # 3; Effective date: 7/12/2017; Section D: CPO Dispatch – D1 (Before CPO Filling Process) & D2 (After CPO Filling Process).	Yes
5.5.2	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a. The site has legal ownership of all input material to be included in outsourced processes;</p>	The mill trades CSPO and CSPK with its buyers among refineries and/or oleochemical plants. Based on agreements, transporter has no ownership of transported products.	Yes

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	b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.	Sighted the recent contract for both CSPO and CSPK were delivered, hence requiring outsource process i.e. transportation. The recent outsourcing of CSPO and CSPK transport as per following: <ul style="list-style-type: none"> - Transportation Agreement; Transporter: HMK Transport Sdn. Bhd.; Commodity: CPO; Contract Addendum; Ref. # SUST/12/2017/01; Date: 28/12/2017 - Transportation Agreement; Transporter: Pengangkutan Sri Silam; Commodity: PK; Contract Addendum; Ref. # SUST/12/2017/01; Date: 28/12/2017 	Yes
	c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.	Written documented procedures was established; Supply Chain; Doc. # TSHR/SUST/SOP05; Rev. # 2; dated 1/11/2018 with Mass Balance (MB) model covering all the RSPO Supply Chain Certification Standard and Traceability for handling certified and noncertified FFB.	Yes
	d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.	Both CSPO and CSPK transporters agreed, as per agreement, to provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.	Yes
5.5.3	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	Names and contact details of transporters used for the physical handling of RSPO certified oil palm products were recorded and registered in the mill supplier database system.	Yes
5.5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	Names and contact details of any new transporter used for the physical handling of RSPO certified oil palm products to be informed by mill supply chain PIC upon available.	Yes
5.6. Sales and goods out –			

<p>5.6.1</p>	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number 	<p>Minimum information of RSPO certified products available in trading contract documents as per following sample contracts:</p> <ul style="list-style-type: none"> - Buyer: TSH-Wilmar Sdn. Bhd.; Contract # 4710007566; Sales order: 1000005251; Date: 29/3/2019; Commodity: TF00002 Crude Palm Oil (CPO) / RSPO MB; Quantity: 600mt - Buyer: TSH-Wilmar Sdn. Bhd.; Contract # 4710007637; Sales order: 1000005333; Date: 29/4/2018; Commodity: TF00002 Crude Palm Oil (CPO); Quantity: 1500mt - Buyer: Lahad Datu Edible Oils Sdn. Bhd.; Contract # 400002126; Sales order: 1000004957; Date: 27/9/2018; Commodity: TF00003 Palm Kernel (PK) / RSPO MB; Quantity: 160mt - Buyer: TSH-Wilmar Sdn. Bhd.; Contract # 400002269; Sales order: 1000005297; Date: 29/4/2019; Commodity: TF00003 Palm Kernel (PK); Quantity: 3,010mt 	<p>Yes</p>
	<ul style="list-style-type: none"> • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). 	<p>A complete and detail informations were presented in the transaction documents as per following:</p> <p>Sample dispatch of CSPO (Certified):</p> <ul style="list-style-type: none"> - Buyer: TSH Wilmar Sdn. Bhd.; W/bridge ticket # 64893; Date: 15/3/2019; DN # 43791; Nett weight: 28,210kg; Vehicle # ST1795J <p>Sample dispatch of CSPO (Conventional):</p> <ul style="list-style-type: none"> - Buyer: TSH Wilmar Sdn. Bhd.; W/bridge ticket # 64194; Date: 19/1/2019; DN # 43292; Nett weight: 29,080kg; Vehicle # ST1428J <p>Sample dispatch of CSPK (Certified):</p> <ul style="list-style-type: none"> - Buyer: Lahad Datu Sdn. Bhd.; W/bridge ticket # 30560; Date: 15/3/2019; DN # 43797; Nett weight: 30560kg; Vehicle # SAB6660V <p>Sample dispatch of CSPK (Conventional):</p>	<p>Yes</p>

		- Buyer: TSH-Wilmar Sdn. Bhd.; W/bridge ticket # 65081; Date: 27/3/2019; DN # 43923; Nett weight: 27,960kg; Vehicle # SS731J	
	<ul style="list-style-type: none"> For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance. 	Announcement registered in PalmTrace system by the HQ Sales Department personnel. Based on PalmTrace transaction report, there were multiple (as per appendix) shipping announcements of both CSPO and CSPK made since the last assessment.	Yes
5.7. Registration of transactions			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> Are mills, traders, crushers and refineries and; Take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. 	The registration of PalmTrace was carried out by the HQ Sales Department based in Tawau. All transactions were registered accordingly in the PalmTrace.	Yes
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. 	Based on the announcement summary, all the registrations were found to be in order.	Yes
	<ul style="list-style-type: none"> Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in 	Not applicable. Products are not sold beyond refinery.	n/a

	a consolidated way at least annually.		
	<ul style="list-style-type: none"> Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. 	Based on the accounting (Mass Balance Allocation Sheet), the removal of volumes was done correctly when the products were sold as conventional.	Yes
	<ul style="list-style-type: none"> Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 	Based on the announcement summary, all the confirmations were found to be in order.	Yes
5.8. Training			
5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.	Training plan on RSPO Supply Chain Standards requirements was established Established as TSH Training Matrix_Mill & Estate; Ref. 4.1.	Yes
5.8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.	- Records of Training Attendance Form; Form # TSHR/TD/F01; Effective date: 1/3/2016; Rev. # 1; Program Name: Supply Chain Certification Standard (SCCS) – For Weighbridge Clerk; Date: 29/10/2018; For Engineers, QA & Account Clerk; Date: 1/6/2018 Venue: Weighbridge Station KPOM; Trainer: Rohana Parilla	Yes
5.9. Record Keeping –			
5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	Kunak Palm Oil Mill has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.	Yes
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	All relevant records related to supply chain available since at least past 2 years. Current records shown positive stock was reported as of the record dated 20/6/2018 for CPO = 2,236.474 mt.	Yes
5.9.3	The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil	Based on the Mass Balance Sheet, the volume of CPO and PK has been allocated to both certified and noncertified products.	Yes

	palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.		
5.10. Conversion factors			
5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleo-chemicals and its Derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleo-chemical and personal care industries.	Conversion factor of CPO and PK production is depending on the actual OER and KER. Previous period under review's average were reported in earlier section of this report.	Yes
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Yes
5.11. Claims –			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Yes
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No "off-product" claim made made by TSH LDPOM in the industry public domain.	Yes
4.2	In corporate communications a member is allowed to: a. display its RSPO membership status	Not applicable.	N/A

	<p>b. display the RSPO web address (www.rspo.org)</p> <p>c. state that the member supports the work of the RSPO</p> <p>d. state the member’s history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO.</p> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at www.rspo.org’ where the link must lead to the member’s profile page.</p>		
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not applicable.	N/A
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	Not applicable.	N/A
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	Not applicable.	N/A
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to Business communication were made through the CSPO and CSPK trading contractual and transactions documentations between the mill and buyers. No further communications made by TSH for its raw products beyond its refinery and oleochemical plants buyers.	Yes
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the	Not applicable.	N/A

	supply chain model and certificate number under which the claim is being made.		
5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>A. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>B. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	Not applicable.	N/A
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	Not applicable.	N/A
Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm	Not applicable.	N/A

	products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.		
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	Not applicable.	N/A
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	Not applicable.	N/A
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Not applicable.	N/A
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	Not applicable.	N/A
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	Not applicable.	N/A
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	Not applicable.	N/A
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use	Not applicable.	N/A

	<p>of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p>		
<p>MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES</p>			
<p>Certified oil palm content (IP)</p>			
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p>	<p>Not applicable.</p>	<p>N/A</p>
<p>Labelling and trademark (IP)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> a. RSPO trademark which includes the tag 'CERTIFIED' or <ul style="list-style-type: none"> • RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. 	<p>Not applicable.</p>	<p>N/A</p>

Messaging (IP)			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	<p>Not applicable.</p>	<p>N/A</p>
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>Not applicable.</p>	<p>N/A</p>

Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 	<p>Not applicable.</p>	<p>N/A</p>
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil 	<p>Not applicable.</p>	<p>N/A</p>

	<p>produced by RSPO certified mills and plantations. In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p>		
	<p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	<p>Not applicable.</p>	<p>N/A</p>
<p>MODULE C – PARTIAL PRODUCT CLAIMS</p>			
	<p>To increase awareness among consumers of the availability of sustainable oil palm products and to help accelerate the uptake, it is permissible to make a claim on product when the percentage of the oil palm content is less than 95% certified, but only when the following conditions have been met:</p> <ul style="list-style-type: none"> The member making the claim is the end product manufacturer, is an RSPO member and is certified against the RSPO SCCS or is an RSPO retailer member authorized to use the trademark by the RSPO. At least 50% of the oil palm content has been supplied through an RSPO certified supply chain as IP, SG or MB. The remainder of the oil palm content that is not RSPO-certified is covered by the purchase of RSPO Credits to an equivalent volume. The product-specific claim is limited to only the following phrase: 'This product contributes to the production of certified sustainable palm oil'. The use of the RSPO label with this claim is mandatory and must include the tag '50% MIXED'. No other percentage is allowable within this claim. 	<p>Not applicable.</p>	<p>N/A</p>
<p>MODULE D – COMBINED SUPPLY CHAIN MODELS SPECIFIC RULES</p>			

	<p>Where a mixture of inputs supplied through different RSPO supply chain models are present in a product, the following applies:</p> <p>75% IP + 20% SG => 95% SG claim is made 65% SG + 30% MB => 95% MB claim is made 55% MB + 40% B&C => 95% partial product claim can be made 45% SG + 55% B&C < 50% B&C claim can be made</p>	Not applicable.	N/A
	<p>Where one supply chain model accounts for 95% of the oil palm content, the claim for this specific model may be made:</p> <p>95% IP + 5% MB => 95% IP IP claim can be made 95% SG + 5% MB => 95% SG SG claim can be made 95% MB + 5% C => 95% MB MB claim can be made</p>	Not applicable.	N/A
5.12. Complaints -			
5.12.1	<p>The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.</p>	<p>The system implemented based on following procedures:</p> <p>ii) Information Request; TSHR/SUST/SOP01; Rev.: 2; Effective date: 1/11/2017</p> <p>iii) Employee grievance; TSHR/HR/SOP06; Rev.: 0; Effective date: 12/1/2016</p> <p>No any stakeholder complaints received since last audit.</p>	Yes
5.13. Management Review			
5.13.1	<p>The organization is required to hold management reviews annually at planned intervals appropriate to the scale and nature of the activities undertaken</p>	<p>Based on procedure of Management Review Meeting; Doc. # TSHR/QD/SOP04; Rev. # 2; Effective date: 1/11/2017, review meeting was held annually for KPOM.</p>	Yes

5.13.2	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	<p>Notice of Management Review Meeting was issued by Asst. Manager/Sustainability HOD on 21/2/2019 to hold the meeting on 1/3/2019 at TSH HQ Tawau Meeting Room. Records of minutes of meeting shown meeting was attended by Group Executive Director, General Manager, AGM, Sustainability HOD, Estate Managers and QA. Agenda included the following (Para 13. Supply Chain and Traceability):</p> <ul style="list-style-type: none"> - Results of internal audit – no findings on SCCS - Customer feedback – no complaints received - Preventive and corrective – no issues - Follow up – no issues 	Yes
5.13.3	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes • Resource needs. 	<p>Output to management review has been included with all information required to be decided on action to be taken.</p>	Yes

Appendix E : CPO Mill Supply Chain Assessment Report (Module E - CPO Mills: Mass Balance)

Requirements	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)				
E.1 Definition						
<p>E.1.1 Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>The Palm Oil Mill receives and process both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified Products.</p>	<p>Yes</p>				
E.2 Explanation						
<p>E.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products shall be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>	<p>Yes</p>				
<p>E.2.2 The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).</p>	<p>Company info available through RSPO IT Platform as following:</p> <table border="1" data-bbox="1144 1235 1850 1358"> <tr> <td data-bbox="1144 1235 1364 1310">Member Name</td> <td data-bbox="1364 1235 1850 1310">TSH Plantation Management Sdn Bhd (Kunak Palm Oil Mill)</td> </tr> <tr> <td data-bbox="1144 1310 1364 1358">Member ID</td> <td data-bbox="1364 1310 1850 1358">RSPO_PO1000007786</td> </tr> </table>	Member Name	TSH Plantation Management Sdn Bhd (Kunak Palm Oil Mill)	Member ID	RSPO_PO1000007786	<p>Yes</p>
Member Name	TSH Plantation Management Sdn Bhd (Kunak Palm Oil Mill)					
Member ID	RSPO_PO1000007786					

	<table border="1"> <tr> <td data-bbox="1155 360 1368 432">RSPO Membership Number</td> <td data-bbox="1368 360 1850 432">1-0173-14-000-00 (TSH Resources Berhad)</td> </tr> </table>	RSPO Membership Number	1-0173-14-000-00 (TSH Resources Berhad)	
RSPO Membership Number	1-0173-14-000-00 (TSH Resources Berhad)			
E.3 Documented procedures				
<p>E.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</p>	<p>Written documented procedures was established; Supply Chain; Doc. # TSHR/SUST/SOP05; Rev. # 2; dated 1/11/2018 with Mass Balance (MB) model covering all the RSPO Supply Chain Certification Standard and Traceability for handling certified and noncertified FFB.</p>	<p>Yes</p>		
<p>b) The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.</p>	<p>The Chief Clerk (Beche Sahibe) has been appointed as the Supply Chain Person In-Charge as per letter dated 14/3/2018. The MB model is used because certified and noncertified (OCP crop) FFB is received and processed at Kunak Palm Oil Mill.</p>	<p>Yes</p>		
<p>E.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	<p>Implementation was based on FFB Purchase procedure; Doc. # TSHR/PR/SOP03; Rev. # 1; Effective Date: 19/2/2018.</p> <p>Sample internal certified FFB received:</p> <ul style="list-style-type: none"> - Supplier: Landquest Estate; W/bridge ticket # 354257; Date: 4/4/2019; GRN # 354204; Nett weight: 11,670kg; Vehicle # SS6005P - Supplier: Maju Sawit Estate; W/bridge ticket # 354225; Date: 4/4/2019; GRN # 354172; Nett weight: 4,600kg; Vehicle # ST3863N <p>Sample external uncertified FFB received:</p>	<p>Yes</p>		

	- Supplier: TSH Bukit Tajam Collecting Centre; W/bridge ticket # 345167; Date: 12/1/2019; GRN # 345114; Nett weight: 25,990kg; Vehicle # ST9637M Supplier: TSH Bukit Tajam Collecting Centre; W/bridge ticket # 345698; Date: 17/1/2019; GRN # 345645; Nett weight: 18,350kg; Vehicle # SS9496J	
E.4 Purchasing and goods in		
E.4.1 The site shall verify and document the volumes of certified and non-certified FFBs received.	Written documented procedures was established; Supply Chain; Doc. # TSHR/SUST/SOP05; Rev. # 2; dated 1/11/2018 with Mass Balance (MB) model covering all the RSPO Supply Chain Certification Standard and Traceability for handling certified and noncertified FFB.	Yes
E.4.2 The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	The facilities aware of the procedure to inform CB immediately as written in the documented procedure of Supply Chain; Doc. # TSHR/SUST/SOP05; Rev. # 2; dated 1/11/2018.	Yes
E.5 Record keeping		
E.5.1 a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and/ or three-monthly basis.	Records available but no balance of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a 3-monthly basis.	Yes
(b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.	Shipping Announcement records available as per Supply Chain Declaration.	Yes
c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)	All relevant records related to supply chain available since at least past 2 years. Current records shown positive stock was reported as of the record dated 20/6/2018 for CPO = 2,236.474 mt.	Yes

Supply Chain Declaration

A. Monthly Records of Certified and Uncertified FFB Received since the last audit (May 2018-May 2019)				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	May-18	2,336.59	30,724.96	33,061.55
2	Jun-18	1,532.36	28,006.65	29,539.01
3	Jul-18	2,301.81	29,202.69	31,504.50
4	Aug-18	2,082.98	31,426.25	33,509.23
5	Sep-18	2,499.42	33,612.71	36,112.13
6	Oct-18	2,753.05	39,413.82	42,166.87
7	Nov-18	2,618.48	37,495.93	40,114.41
8	Dec-18	2,696.12	38,892.87	41,588.99
9	Jan-19	2,477.27	37,376.57	39,853.84
10	Feb-19	1,902.68	32,555.06	34,457.74
11	Mar-19	1,696.31	37,166.41	38,862.72
12	Apr-19	2,067.06	35,604.05	37,671.11
13	May-19	2,247.01	34,289.83	36,536.84
	Total	29,211.14	445,767.80	474,978.94

B. Monthly Records of Certified CPO & PK since the last audit (May 2018-May 2019)			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	May-18	491.29	124.81
2	Jun-18	342.81	73.55
3	Jul-18	485.77	125.88
4	Aug-18	446.07	108.34
5	Sep-18	540.68	136.90
6	Oct-18	574.50	142.74
7	Nov-18	526.98	137.73
8	Dec-18	537.52	141.55
9	Jan-19	491.28	127.33
10	Feb-19	408.11	105.03
11	Mar-19	381.02	95.16
12	Apr-19	444.11	115.76
13	May-19	472.51	119.57

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Total	6,142.65	1,554.35
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C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any) (May 2018-May 2019)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	4710007566, 4710007613	TR-0bbdb4d7-a567	601.33	-
2	LDO/36P1903/0082L	TR-f76ce224-63ca	-	27.44
3	4710007566	TR-41df52ff-2b27	479.92	-
4	LDO/36P1812/0060L,1901/0098L,1902/0083L, 1903/0082L	TR-ebd92c28-a0d3	-	477.49
5	4710007522, 7476, 7523, 7566	TR-96b2c8f5-3edc	722.84	-
6	4710007415, 4710007476	TR-b473298e-ff9c	616.95	-
7	LDO/36P1811/0070L, LDO/36P1812/0060L	TR-62905c69-a2b1	-	115.23
8	4710007350, 4710007415	TR-58cac6ae-6564	583.31	-
9	LDO/36P1810/0052L, LDO/36P1811/0070L	TR-c5a63258-23c1	-	207.96
10	4710007349, 4710007350	TR-4b878b15-3561	596.85	-
11	LDO/36P1809/0070L, LDO/36P1810/0052L	TR-2891b88a-5b94	-	149.51
12	4710007285, 7237, 7286, 7350	TR-d81558dd-8553	598.16	-
13	LDO/36P1809/0070L	TR-e089eba1-ec86	-	147.51
Total			4,199.36	1,125.14

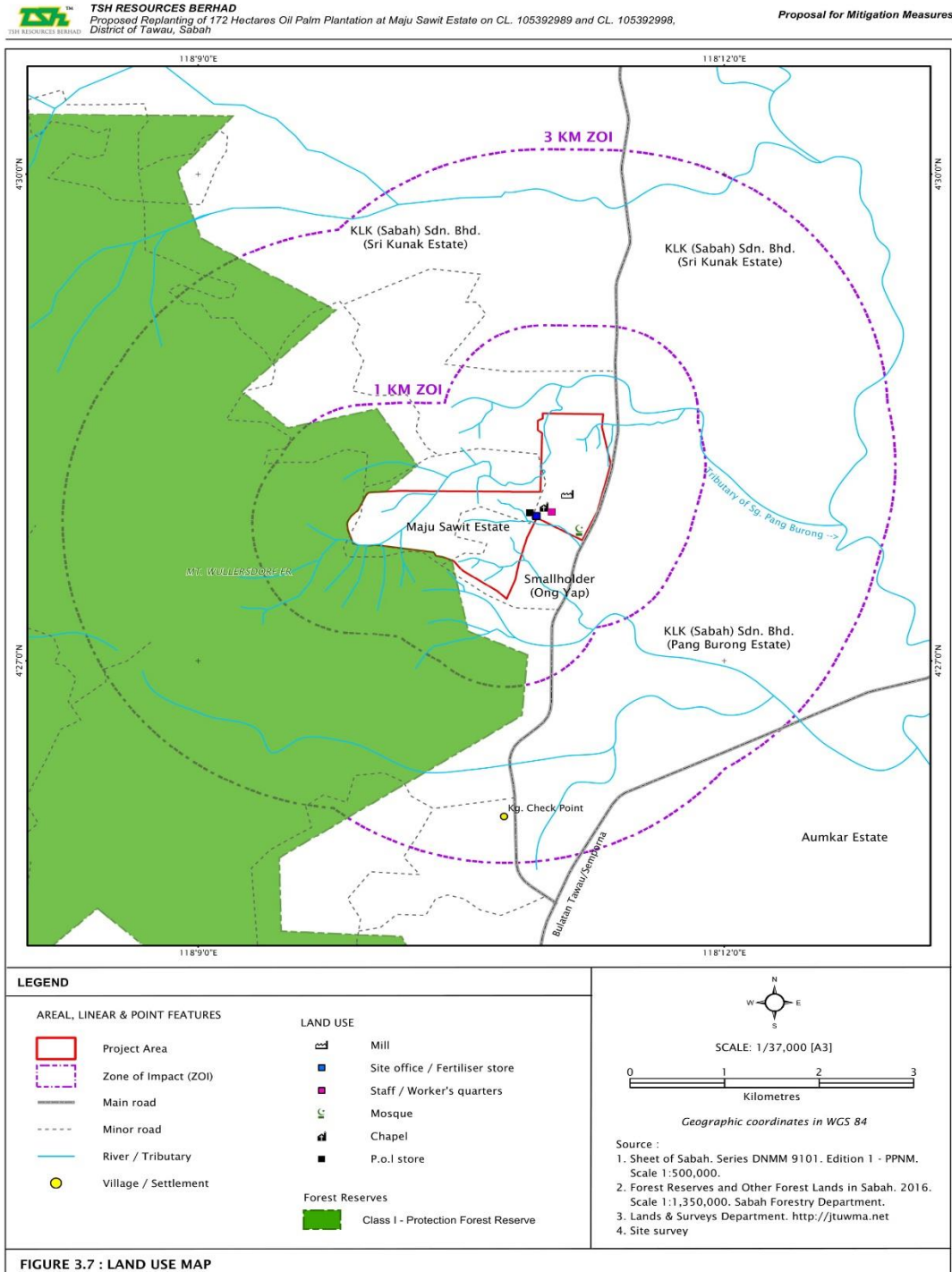
D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
Nil	n/a	n/a	n/a	n/a

E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any) (May 2018-May 2019)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	N/A		

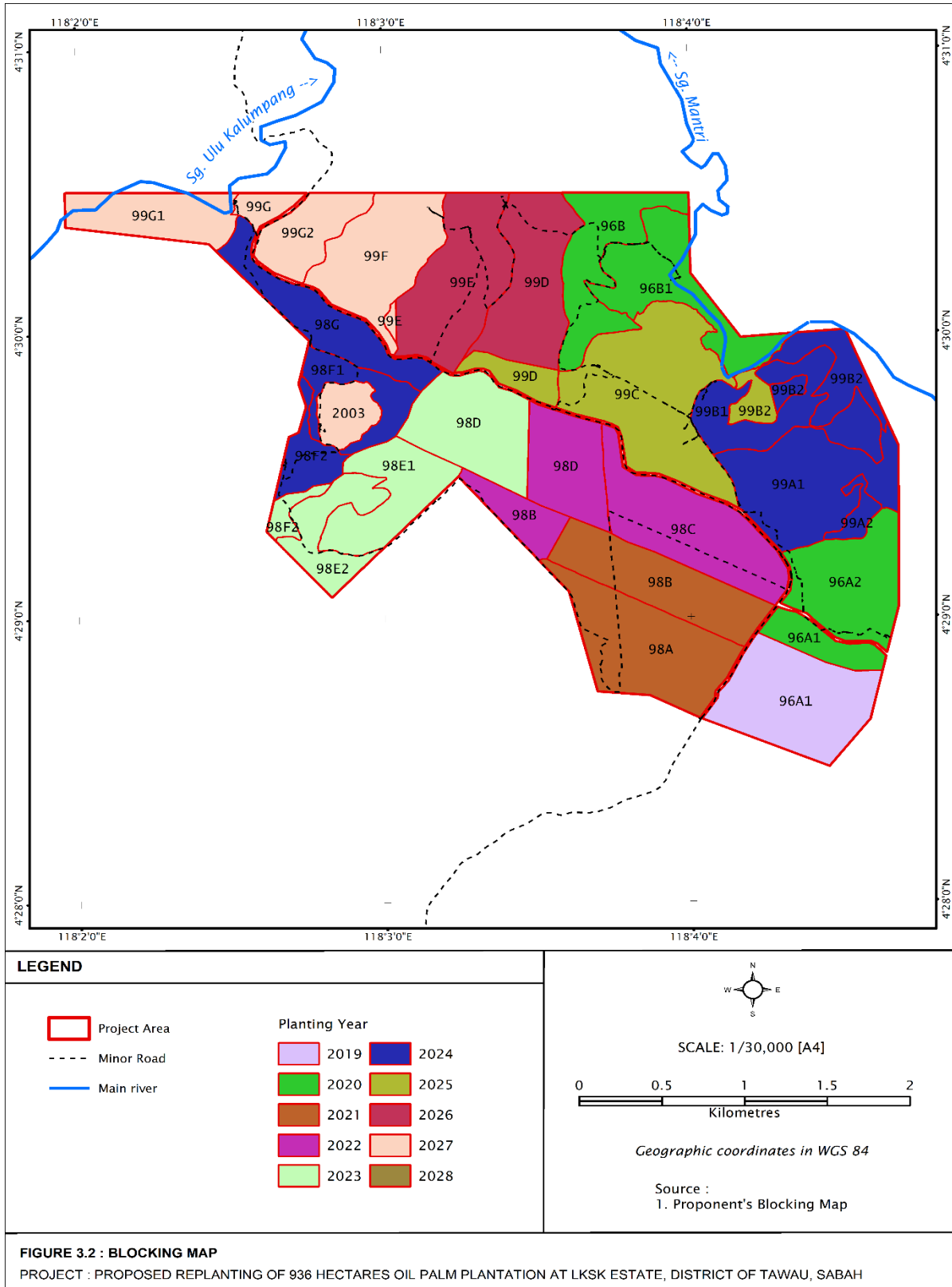
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F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any) (June 2018-May 2019)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
Nil	n/a	n/a	n/a

Appendix F: Location Map of Kunak Palm Oil Mill Certification Unit and Supply bases



Appendix G: LKSK Estate Field Map



Appendix H: Landquest Estate Field Map

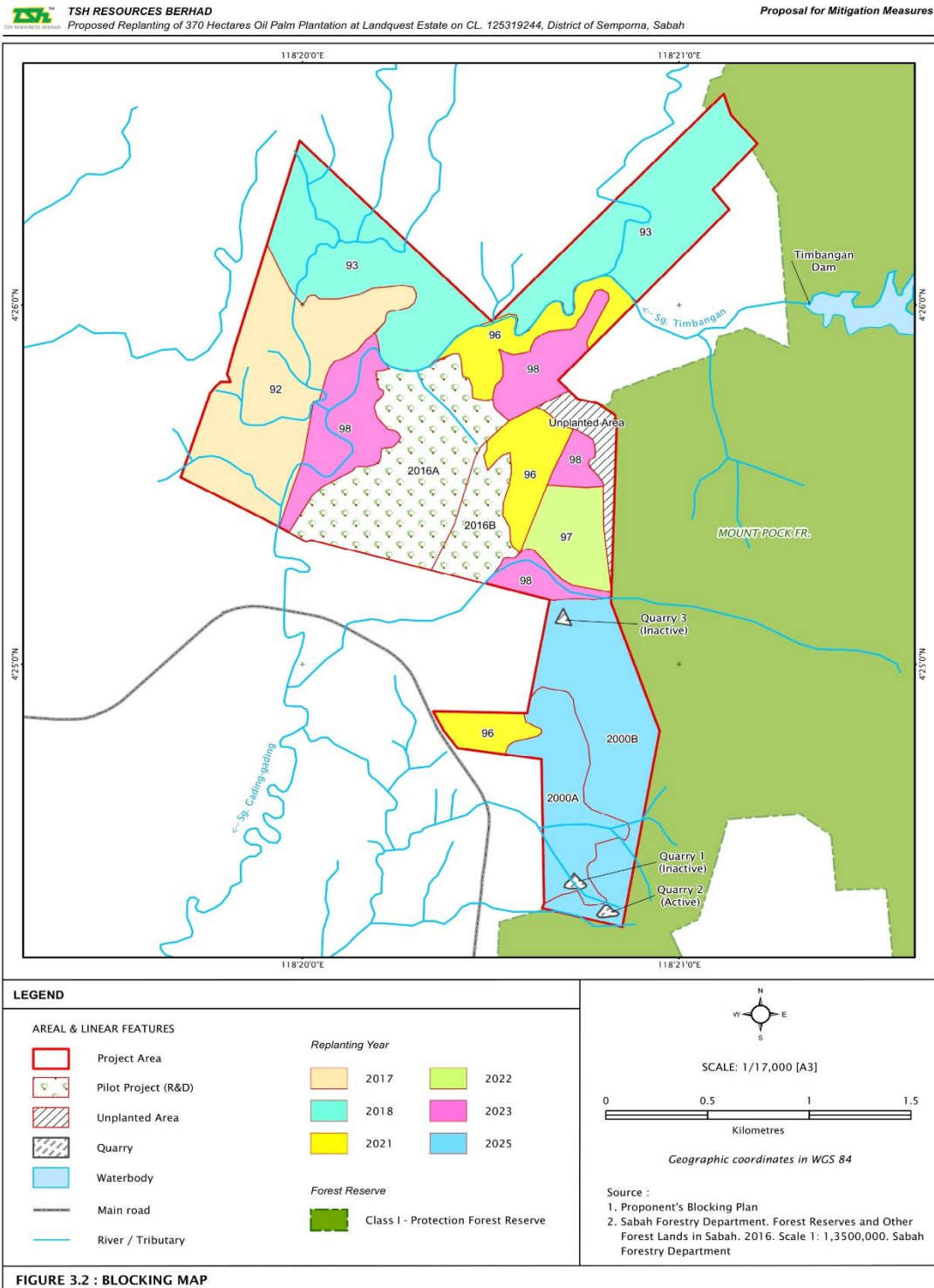
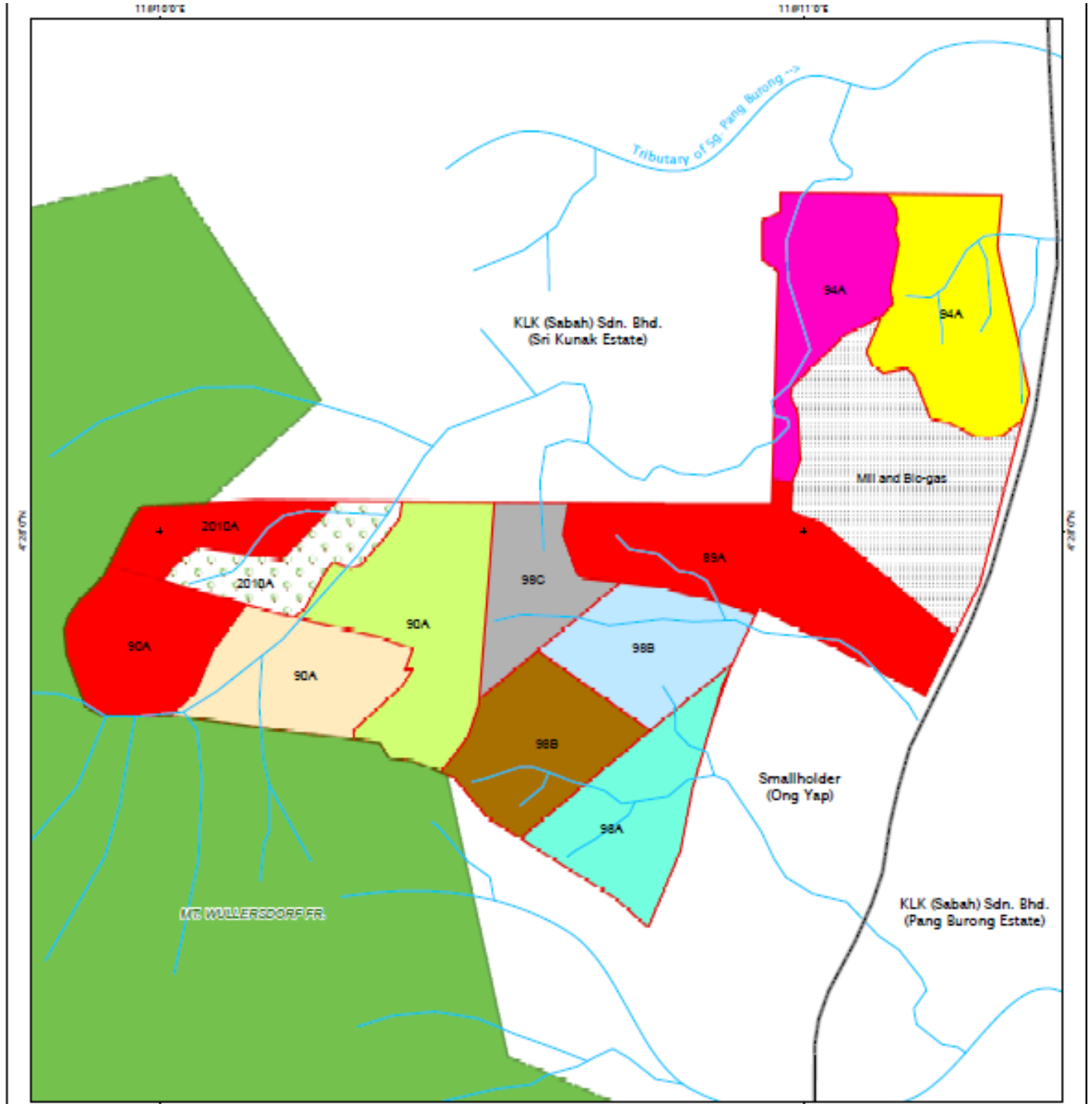
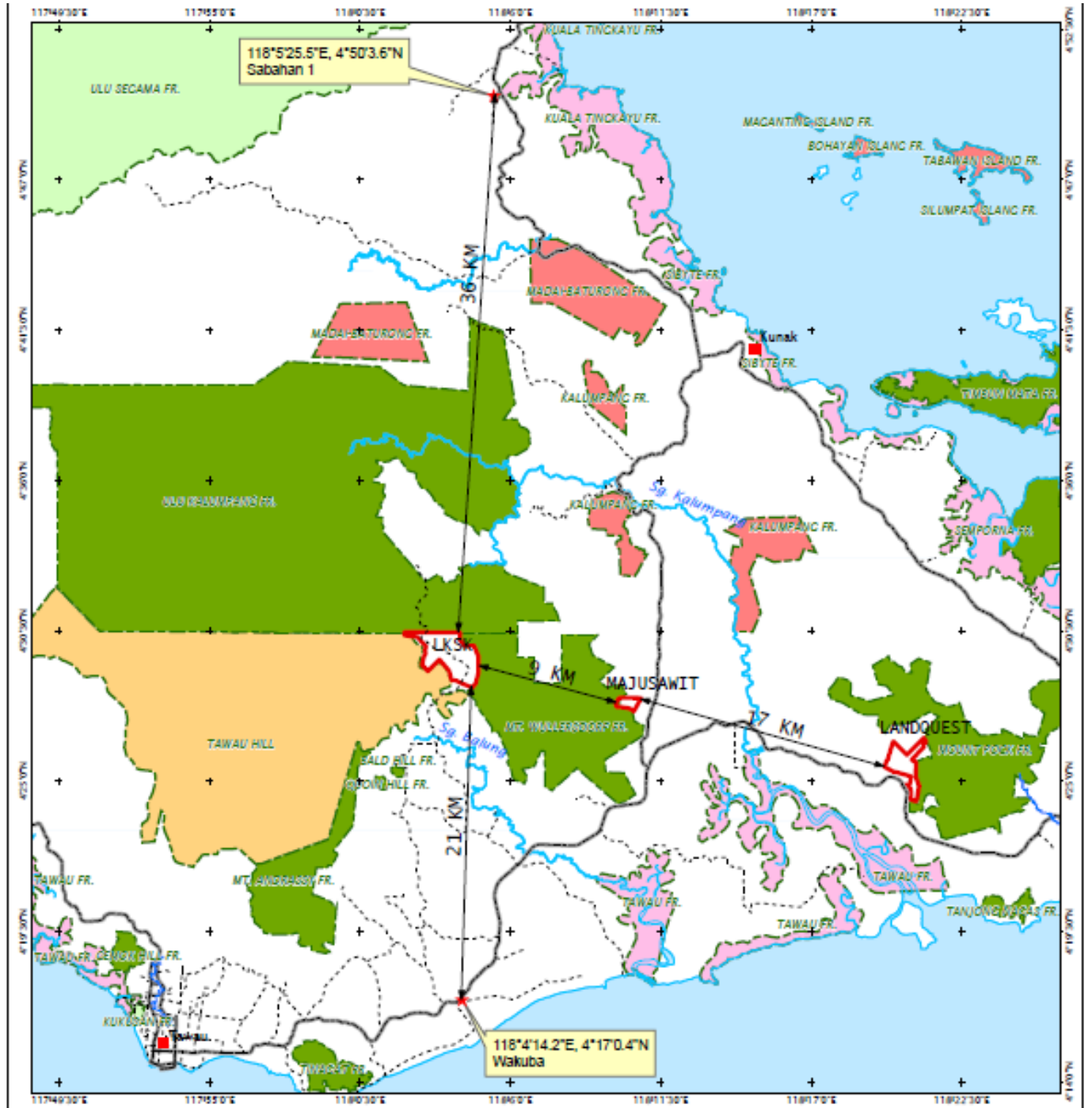


FIGURE 3.2 : BLOCKING MAP

Appendix I: Maju Sawit Estate Field Map



Appendix J : Wakuba Estate Field Map



Appendix K : List of Smallholder Sampled

Not applicable

Appendix L: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel 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
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MB	Mass Balance
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
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure