

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (1_4)
- Recertification Assessment (Choose an item.)
- Extension of Scope

Client Company name (Parent Company): Carotino/JC Chang Group
Client company Address: Unit 30-01, Level 30, Menara Landmark No. 12, Jalan Ngee Heng, 80000 Johor Bahru, Johor, Malaysia
Certification Unit: Asia Palm Oil Mill (Asia Production Unit)
Location of Certification Unit: KM 45, Off Jalan Lahad Datu – Sandakan, 91100 Lahad Datu, Sabah, Malaysia
Date of Final Report: 28/02/2022

TABLE of CONTENTS

Page No

Section 1: Scope of the Assessment.....	3
1. Company Details	3
2. Certification Information	3
3. Other Certifications.....	3
4. Location(s) of Mill & Supply Bases	4
5. Description of Supply Base	4
6. Plantings & Cycle.....	4
7. Summary of Certified Tonnage of FFB (Own Certified Scope)	5
8. Summary of Certified Tonnage of FFB (from other certified unit(s))	5
9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate).....	5
10. Summary of Certified Tonnage (not applicable for ISS)	6
11. Summary of Actual Volume sold	7
12. Independent Smallholders Certified Tonnage / Volume	9
13. Independent Smallholders Actual Sold Tonnage / Volume	9
Section 2: Assessment Process	10
2.1 Assessment Methodology, Programme, Site Visits.....	10
2.2 BSI Assessment Team	11
2.3 Assessment Plan.....	12
Section 3: Assessment Findings	16
3.1 Multiple Management Units and Time Bound Plan.....	16
3.2 Progress of scheme smallholders and/or outgrowers.....	18
3.3 Details of Nonconformities	21
3.3.1 Status of Nonconformities Previously Identified and Observations.....	23
3.3.2 Summary of the Nonconformities and Status	24
3.4 Stakeholders and previous land owner / user consultation.....	24
3.5 Impartiality and conflict of interest	26
Formal Signing-off of Assessment Conclusion and Recommendation	27
Appendix A: Summary of Findings	28
Appendix B: GHG Reporting Executive Summary	124
Appendix C: Location Map of Certification Unit and Supply bases.....	126
Appendix D: Estate Field Map.....	127
Appendix E: List of Smallholder Registered and sampled.....	129
Appendix F: List of Abbreviations	130

Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Carotino/JC Chang Group		
RSPO Membership Number	2-0029-06-000-00	Membership Approval Date	10/5/2006
Address	Unit 30-01, Level 30, Menara landmark No.12, Jalan Ngee Heng 80000 Johor Bahru, Johor, Malaysia.		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Asia Palm Oil Mill (Asia Production Unit)		
Location / Address	KM 45, Off Jalan Lahad Datu – Sandakan, 91100 Lahad Datu, Sabah, Malaysia		
Website	www.carotino.com		
Management Representative	Mr Seow Chee Chiang	E-mail	seowcc@jcc.com.my
Telephone	+607 223 1633 (Head Office) +6010 965 4828 (Mill)	Facsimile	+607 224 1546

2. Certification Information			
Certificate Number	RSPO 651278	Certificate Start Date	31/01/2018
Date of First Certification	31/01/2013	Certificate Expiry Date	30/01/2023
Scope of Certification	Production of Palm oil and Palm Kernel		
Visit Objectives	<ul style="list-style-type: none"> - Determination of the conformity of the client’s management system, or parts of it, with criteria. - Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 1_4) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	60 mt/hr
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

EU-ISCC-Cert-US201-70600891	ISCC EU (International Sustainability and Carbon Certification)	SCS Global Services	20/12/2021
50450981 MSPO3	MS2530-3 : 2013 General Principles For Oil Palm Plantations and Organised Smallholders	DQS Certification (M) Sdn Bhd	09/01/2026
50450207 MSPO4	MS2530-4 : 2013 General Principles for Palm Oil Mills	DQS Certification (M) Sdn Bhd	09/01/2026
50450207 MSPO SCCS	Malaysia Sustainable Palm Oil (MSPO)/ Supply Chain Certification	DQS Certification (M) Sdn Bhd	13/11/2025

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Asia Palm Oil Mill	KM 45, Off Jalan Lahad Datu – Sandakan, 91100 Lahad Datu, Sabah, Malaysia	5° 17' 34.01" N	118° 12' 24.54" E
Asia Oil Palm Estate Div. 2	KM 45, Off Jalan Lahad Datu – Sandakan, 91100 Lahad Datu, Sabah, Malaysia	5° 18' 16.63" N	118° 11' 56.53" E
Melewar Estate Div.2	KM45, Jalan Lahad Datu-Sandakan	5° 15' 58.70" N	118° 9' 35.99" E
Hwa Li Estate Div.3	KM45, Jalan Lahad Datu-Sandakan	5° 20' 41.59" N	118° 18' 19.32" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Melewar Estate Div.2	1,770.41	-	252.99	2,023.40	87.50
Asia Oil Palm Estate Div.2	2,720.72	-	303.28	3,024.00	89.97
Hwa Li Estate Div.3	3,953.24	-	435.47	4,388.71	90.08
Total	8,444.37	-	991.74	9,436.11	89.49

6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Melewar Estate Div. 2	360.72	-	-	1,409.69		1,409.69	360.72
Asia Oil Palm Estate Div.2	730.05	489.97	22.52	800.33	677.85	1,990.67	730.05
Hwa Li Estate Div.3	10.00			3,943.24		3,943.24	10.00
Total (ha)	1,100.77	489.97	22.52	6,153.26	677.85	7,343.60	1,100.77

7. Summary of Certified Tonnage of FFB (Own Certified Scope)

Estate / Smallholders	Tonnage / year			
	Estimated last year (Jan 2021 – Dec 2021)	Actual (March 2021 – Nov 2021)		Forecast (Jan 2022 – Dec 2022)
		Previous license period (Nil)	Current license period (Mar 2021 – Nov 2021)	
Asia Oil Palm Estate 2	42,659.92	-	25,351.87	38,700.00
Melewar Estate 2	26,749.92	-	18,473.08	21,239.00
Hwa Li Estate 3	83,277.91	-	50,926.70	62,596.00
Total	152,687.75		94,751.65	122,535.00

8. Summary of Certified Tonnage of FFB (from other certified unit(s))

Estate / Smallholders	Tonnage / year			
	Estimated last year (Jan 2021 – Dec 2021)	Actual (Mar 2021 – Nov 2021)		Forecast (Jan 2022 – Dec 2022)
		Previous license period (Nil)	Current license period (Mar 2021 – Nov 2021)	
Pahang Oil Palm Estate 2		-	13,683.82	
Pahang Oil Palm Estate 3		-	12,221.17	
Gerola Estate		-	651.250	
Tye Yang Plantation S/B		-	1,245.74	
Melewar Estate 1		-	780.65	
Total			28,582.63	

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

Out growers / smallholders	Tonnage / year		
	Estimated last year	Actual (Mar 2021 – Nov 2021)	Forecast

RSPO P&C Public Summary Report

Revision 12 (Jun 2021)

	(Jan 2021 – Dec 2021)			(Jan 2022 – Dec 2022)
		<i>Previous license period (Nil)</i>	<i>Current license period (Mar 2021 – Nov 2021)</i>	
Independent FFB Supplier / Outgrowers	NIL	-	15,066.88	NIL
Total	NIL	15,066.88		NIL

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Mar 2021	10107.690	1138.990	11,246.680
2	Apr 2021	12766.240	1279.570	14,045.810
3	May 2021	16138.650	1433.740	17,572.390
4	June 2021	15980.120	1585.760	17,565.880
5	July 2021	11110.870	1398.440	12,509.310
6	Aug 2021	14961.250	2044.190	17,005.440
7	Sep 2021	15512.890	2471.560	17,984.450
8	Oct 2021	12598.990	1857.810	14,456.800
9	Nov 2021	14157.580	1856.820	16014.400
TOTAL		123,334.30	15,066.88	138,401.2

Note: Period reporting is less than 12months: the previous onsite audit conducted on 29-31/3/2021 due to the Covid 19 pandemic and involved partial remote audit on 30/11/2020.

10. Summary of Certified Tonnage (not applicable for ISS)			
Estimated last year (Jan 2021 – Dec 2021)	Actual (Mar 2021 – Nov 2021)		Forecast (Jan 2022 – Dec 2022)
	<i>Previous license period (Nil)</i>	<i>Current license period (Mar 2021 – Nov 2021)</i>	
FFB	FFB		FFB
152,687.75		123,334.30	122,535.00
CPO (OER:19.94 %)	CPO (OER:20.81 %)		CPO (OER:18.55 %)
30,445.94		25,666.58	22,730.25
PK (KER:5.45%)	PK (KER:5.22%)		PK (KER:4.64%)
8,321.48		6,440.93	5,697.87

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Mar 2021	2,048.958	560.468
2	Apr 2021	2,632.154	748.040
3	May 2021	3,256.849	875.220
4	June 2021	3,378.702	836.646
5	July 2021	2,313.589	524.937
6	Aug 2021	3,155.936	743.983
7	Sep 2021	3,250.603	779.474
8	Oct 2021	2,682.124	657.195
9	Nov 2021	2,947.662	714.970
TOTAL		25,666.58	6,440.93

11. Summary of Actual Volume sold					
Current License period (Mar'21-Nov'21)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	10,589.22	4,618.26	-	10,333.10	25,540.58
PK (MT)	5,813.17	-	-	550.93	6,364.10
Credits					
Previous License period (Nil)					
CPO (MT)	-	-	-	-	-
PK (MT)	-	-	-	-	-
Credits	-	-	-	-	-
Note: CPO=171.92mt and PK=32.75mt :From the data verification during audit, the CPO and PK value was bring forward from previous license					

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	Lahad Datu Edible Oils Sdn.Bhd.	TR-212e23c4-f749	1,403.290	-
2	Lahad Datu Edible Oils Sdn.Bhd.	TR-f74bff5a-2968	29.440	-
3	Lahad Datu Edible Oils Sdn.Bhd.	TR-847253a2-86b3	2.29	-
4	Lahad Datu Edible Oils Sdn.Bhd.	TR-7fbece23-7e8e	3,093.210	-
5	Lahad Datu Edible Oils Sdn.Bhd.	TR-0e3e55ea-febf	1,406.790	-

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

6	Lahad Datu Edible Oils Sdn.Bhd.	TR-6d94d960-06f7	930.640	-
7	Lahad Datu Edible Oils Sdn.Bhd.	TR-0816290d-b18b	1,369.360	-
8	Lahad Datu Edible Oils Sdn.Bhd.	TR-cff20069-1c52	747.660	-
9	Lahad Datu Edible Oils Sdn.Bhd.	TR-7f708773-75b4	1,606.540	-
10	Lahad Datu Edible Oils Sdn.Bhd.	TR-11b8e8c-cd0e	-	348.920
11	Lahad Datu Edible Oils Sdn.Bhd.	TR-d8c6220d-d9e7	-	21.600
12	Lahad Datu Edible Oils Sdn.Bhd.	TR-dafddb38-2a15	-	552.450
13	Lahad Datu Edible Oils Sdn.Bhd.	TR-f6d844c5-4dc7	-	97.550
14	Lahad Datu Edible Oils Sdn.Bhd.	TR-3508ff47-328e	-	704.900
15	Lahad Datu Edible Oils Sdn.Bhd.	TR-beca3daf-dc1e	-	419.550
16	Lahad Datu Edible Oils Sdn.Bhd.	TR-a49bec49-8f60	-	145.100
17	Lahad Datu Edible Oils Sdn.Bhd.	TR-389cc372-22eb	-	550.490
18	Lahad Datu Edible Oils Sdn.Bhd.	TR-1a1bc6fc-2255	-	179.960
19	Lahad Datu Edible Oils Sdn.Bhd.	TR-de266b56-ab64	-	500.000
20	Lahad Datu Edible Oils Sdn.Bhd.	TR-16b7224f-0617	-	149.440
21	Lahad Datu Edible Oils Sdn.Bhd.	TR-e0a1fd5e-d1c1	-	592.650
22	Lahad Datu Edible Oils Sdn.Bhd.	TR-7deb8bf1-fb0e	-	22.730
23	Lahad Datu Edible Oils Sdn.Bhd.	TR-667120e8-34fa	-	0.56
24	Lahad Datu Edible Oils Sdn.Bhd.	TR-74790930-ffd7	-	941.660
25	Lahad Datu Edible Oils Sdn.Bhd.	TR-a32f4c03-9e42	-	8.340
26	Lahad Datu Edible Oils Sdn.Bhd.	TR-e5a8c065-ef6e	-	577.270
TOTAL			10,589.22	5,813.17

11B. Records of CPO & PK Sold under other schemes since the last audit (if any)

No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	Lahad Datu Edible Oils Sdn.Bhd	ISCC	4,618.260	-
TOTAL			4,618.26	-

11C. Records of CPO & PK Sold as conventional since the last audit (if any)

No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	Lahad Datu Edible Oils Sdn.Bhd.	10,333.097	550.927
TOTAL		10,333.097	550.927

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
	N/A	N/A	N/A
TOTAL			N/A

12. Independent Smallholders Certified Tonnage / Volume									
Phase	Estimated last year (N/A)			Actual (N/A)			Forecast (N/A)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB									
IS-CSPO									
IS-CSPKO									
IS-CSPKE									

13. Independent Smallholders Actual Sold Tonnage / Volume						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
Current License period (March 2021 – Nov 2021)						
Credits				Nil	Nil	Nil
Physical	Nil	Nil	Nil			

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639
Representative: Nicholas Cheong (Nicholas.Cheong@bsigroup.com)
Website: www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI 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.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **6-9/12/2021**. The audit programme is included as Section 2.3. The approach to the audit was to treat the mill and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety.

The Critical NC close out on-site assessment was conducted on **14/1/2021**. The audit programs are included in Section 2.3.

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. Malaysia National Interpretation 2019 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment. While, the sampling of smallholders were based on the formula $(\sqrt{y}) \times (z)$; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E.

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.

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 3.4.

The non-conformities for this audit are detailed in Section 3.3 and unless it is stated in this section, all previous nonconformities including minor nonconformities are remains closed.

This report is structured to provide a summary of assessment finding as provided in Appendix A. The assessment was conducted based on risk based approach sampling and therefore nonconformities may exist.

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer 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_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
Asia Oil Palm Estate 2	√	√	√	√	√
Melewar Estate 2	√	√	√	√	√
Hwa Li Estate 3	√	√	√	√	√
Asia Palm Oil Mill	√	√	√	√	√

Tentative Date of Next Visit: December 5, 2022 - December 9, 2022

Total Number of Mandays: 12

2.2 BSI Assessment Team

Name	Role	Competency
Muhamad Naqiuddin Mazeli (MNM)	Team Leader	<p>Education: Bachelor Science Horticulture, UPM</p> <p>Work Experience: 11 years working experience in oil palm plantation industry as sustainability team. Joining the sustainability team, managed, implement and monitors the RSPO, ISCC, MSPO and ISO9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training related to RSPO, MSPO and other certifications where applicable to the operations during previous company.</p> <p>Training attended: ISO 9001: 2015 LA Training(2019), ISO 14001: 2015 LA Training (2018), ISO 45001: 2018 LA Training (2018), HCV & HCS Training (2019), RSPO P&C LA Training(2018), MSPO LA Training (2018), SMETA Training (2021)</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, Smallholders inclusion, legal requirements, environment, RSPO supply chain and HCV.</p> <p>Language proficiency: Able to communicate in Bahasa Malaysia and English.</p>
Rahayu Zulkifli (RZU)	Team Member	<p>Education: Law Degree from John Moores University, Liverpool, United Kingdom in 1988.</p> <p>Work Experience: She was a practicing lawyer before she joined several public listed companies as Head of Legal Department. In 2003 she joined an environmental NGO as a turtle conservationist, and in 2014 joined RSPO as Dispute Settlement Facility Manager. Rahayu is now a freelance auditor</p>

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>specializing in social aspects of the RSPO and MSPO standards, with audit experiences in Malaysia, Indonesia and Ghana.</p> <p>Training attended: RSPO-endorsed Lead Auditor course in 2014, ISO 14001 Lead Auditor course in 2016, the MSPO Awareness Training in 2016, and RSPO-endorsed Lead Auditor Refresher course in 2018. Additionally, Rahayu also assists in HCV assessments (in particular HCV 5 & 6), as well as carry out Social Impact Assessments. Rahayu is also a trained and certified Mediator.</p> <p>Aspect covered in this audit: During this assessment, she assessed on the aspects of legal, social and stakeholder engagement.</p> <p>Language proficiency: Able to communicate in Bahasa Malaysia and English.</p>
Vijay Kanna Pakirisamy (VKP)	Team Member	<p>Education: Bachelor Degree in Agribusiness Science Management, University Utara Malaysia</p> <p>Work Experience: He gained his working exposure in the plantation sector, serving as an Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad. Throughout his 10 year tenure in the oil palm industry, he has been part of the operations team that implements standards within the estate such as RSPO, MSPO, ISCC and FINWATCH.</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in November 2019, endorsed RSPO P&C Lead Auditor Course in October 2019 and endorsed MSPO Lead Auditor Course in November 2019</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of Occupational, Health & Safety and estate best practises</p> <p>Language proficiency: Able to communicate in Bahasa Malaysia and English.</p>

Accompanying Persons:

Name	Role
Nil	

1.3 Assessment Plan

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

Date	Time	Subjects	MNM	RZU	VKP
Monday, 6/12/2021		Travel from KL to Lahad Datu.	√	√	√
Monday, 6/12/2021	0800-0900	Travel from Lahad Datu to Melewar estate Div 2	√	√	√
Melewar Estate Div 2	0900-0930	Opening Meeting: • Opening Presentation by Audit Team Leader	√	√	√

Date	Time	Subjects	MNM	RZU	VKP
		<ul style="list-style-type: none"> Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation). 			
	0930 - 1230	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√
	1230 - 1330	Lunch	√	√	√
	1330 - 1630	Document review P1 – P7: (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	√	√	√
Tuesday, 7/12/2021 Hwa Li Estate Div. 3	9.00 - 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√
	1230 - 1330	Lunch	√	√	√
	1330 - 1630	Document review P1 – P7: (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	√	√	√
Wednesday 8/12/2021 Asia POM	9.00 - 12.30	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, Lab, weighbridge and palm product storage area, etc.	√	√	√

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Date	Time	Subjects	MNM	RZU	VKP
	1230 - 1330	Lunch	√	√	√
	1330 - 1630	Document Review P1 – P7: SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation. RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records	√	√	√
	1630 - 1700	Interim Closing Briefing	√	√	√
Thursday 9/12/2021 Asia Oil Palm Estate Div. 2	0900 - 1000	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√
	1230 - 1330	Lunch	√	√	√
	1330 - 1600	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	1600 - 1630	Auditors discussion & closing preparation	√	√	√
	1630 - 1700	Closing Meeting	√	√	√

Major NC Close Out verification plan for – Asia Palm Oil Mill and Supply Base Estates (Asia Production Unit)

Date	Time	Subjects	MNM
Thursday, 13/1/2022		Travel from KL to Lahad Datu and check in Hotel.	√
	0800-0900	Travelling from Lahad Datu to Estate	√

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Date	Time	Subjects	MMN
Friday, 14/1/2022	0900-0930	Asia Oil Palm Estate Div. 2 Estate: 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/workers consultation). 	√
	0930–1130	Asia Oil Palm Estate Div. 2 estate: Verification on previous Major NC. Site observation ,workers interview (individual and group session) if necessary Document review – implemented evidence	√
	1130–1230	Closing	√
	1230-1700	Travelling back to Kuala Lumpur	√

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Yes	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	Yes. The Group has achieved 100% RSPO certification for all Operating Units under the management of JC Chang Group at ended year of 2019. The last Production Unit namely Takon Production Unit have undergone RSPO main assessment on 28/10 to 1/11/19 with a positive result and the CB have recommended Takon Production Unit for RSPO certification, but the certification was on hold due to unsettlement of RaCP. On Feb 2021, Takon Palm Oil Mill was sold to non-RSPO member and followed by Takon Estate on July 2021. RaCP concept note have approved by RSPO and the Group have restructure Takon Production Unit to include the remaining Operation Units from Takon Production Unit namely Muis Melewar Plantation 1, Muis Melewar Plantation 2 and Pelita Estate to Melewar Production Unit. These Operating Units had finished 30% of RSPO remote audit on 17-18/06/2021. The remaining 70% of RSPO site audit will be held on 06-10/12/2021 together with the existing Melewar Production Unit.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.	Yes. The land has been certified during previous assessment during previous owner Smart Foremost Sdn Bhd.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	No	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Changes involved the restructure of Takon Production Unit due to selling of Takon Palm Oil Mill to non-RSPO member on 22/1/2021 and followed by Takon Estate on July 2021. Yes this consistent with ACOP 2020 .	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No isolated lapses in implementation of the plan	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to	No fundamental failure in implementation of the plan	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

proceed with implementation of the plan? If yes a Major non-compliance shall be raised		
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	No replacement after dates defined in RSPO P & C MYNI 2019	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No new development since January 1 st 2010.	Complied
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 4.4, 4.5, 4.6, 4.7 and 4.8.	No land conflict as per interview with stakeholder and document verification. RaCP concept note have approved by RSPO and the Group have restructure Takon Production Unit to include the remaining Operation Units from Takon Production Unit namely Muis Melewar Plantation 1, Muis Melewar Plantation 2 and Pelita Estate to Melewar Production Unit.	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	No labour dispute reported as per verification.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance reported and found during the onsite audit.	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Yes. Internal audit conducted with findings highlighted for site further improvement. Pelita estate – 17-19/8/2021 Muis Melewar Plantation 1– 23-25/8/2021 Muis Melewar Planation 2 – 7-9/9/2021 This audit by Internal Control Team as per record verification.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No as per internal audit record verification.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Yes refer as per indicator 1.1.4 for details	Complied

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>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.</p>	Not Applicable	Complied

Approved Time Bound Plan

SUSTAINABILITY ASSESSMENT PROGRAMME (TIME BOUND PLAN) FOR FINACIAL YEAR 2021/22.

Production Unit	Type of Certification Obtained	Type of Sustainability Assessment / Date Planned For Audit		
<u>Carotino Production Unit</u> Carotino Palm Oil Mill Asia Oil Palm Estate 1 Pahang Oil Palm Estate 1 Maran Estate Hwa Li Estate 1 Hwa Li Estate 2	RSPO, ISCC, MSPO	RSPO	ISCC	MSPO
		19-21/01/2022	15-19/08/2022	08-12/08/2022
<u>Asia Production Unit</u> Asia Palm Oil Mill Asia Oil Palm Estate 2 Melewar Estate 2 Hwa Li Estate 3	RSPO, ISCC, MSPO	RSPO	ISCC	MSPO
		06-10/12/2021	15-18/08/2022	08-12/08/2022
	RSPO, ISCC, MSPO	RSPO	ISCC	MSPO

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

<p>Melewar Production Unit</p> <p>Melewar Palm Oil Mill Gerola Estate Tye Yang Estate Melewar Estate 1 Pahang Oil Palm Estate 2 Pahang Oil Palm Estate 3 Pelita Estate Muis Melewar Plantation 1 Muis Melewar Plantation 2</p>		06-10/12/2021	07-11/03/2022	08-11/03/2022
---	--	---------------	---------------	---------------

Remarks,

The Group has achieved 100% RSPO certification for all Operating Units under the management of JC Chang Group at ended year of 2019. The last Production Unit namely Takon Production Unit have undergone RSPO main assessment on 28/10 to 1/11/19 with a positive result and the CB have recommended Takon Production Unit for RSPO certification, but the certification was on hold due to unsettlement of RaCP. On Feb 2021, Takon Palm Oil Mill was sold to non-RSPO member and followed by Takon Estate on July 2021. RaCP concept note have approved by RSPO and the Group have restructure Takon Production Unit to include the remaining Operation Units from Takon Production Unit namely Muis Melewar Plantation 1, Muis Melewar Plantation 2 and Pelita Estate to Melewar Production Unit. These Operating Units had finished 30% of RSPO remote audit on 17-18/06/2021. The remaining 70% of RSPO site audit will be held on 06-10/12/2021 together with the existing Melewar Production Unit.

3.3 Details of Nonconformities

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

During this Assessment there were *One* (1) Critical; *No* Minor nonconformities and *one* Opportunity For Improvement raised. The *Asia Production Unit* 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 Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2140837-202112-M1	Date Issued	9/12/2021
Due Date	08/03/2022	Date of nonconformity Closure	14/1/2022
Clause & Category (Critical / Minor)	6.2.1 (C)		
Statement of Nonconformity:	Asia Oil Palm Sdn Bhd (Asia 2 Estate) had not adequately explained to workers Clause 11 of the employment contract which states that medical costs would be fully borne by the company.		
Requirement Reference:	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.		
Objective Evidence:	Asia 2 Estate had not adequately explained clause 11 of the employment contract dated 1 June 2020 to Worker No. AE200768 that medical costs would be fully borne by the Estate. This had resulted in a deduction of RM85 from the worker's salary in May 2021 for the medical treatment for sinus bradycardia he received at Klinik Mabello (Paris), Kota Kinabatangan on 29 March 2021.		
Corrections:	Worker to be briefed thoroughly on Foreign Worker Contract Agreement and explain Clause 11 where medical costs would be fully borne by the Estate. Worker No. AE200768 were called to the Estate office and had been briefed thoroughly by Estate Management pertaining on the Foreign Worker Contract Agreement especially on Clause 11 and revised version. The amount of RM85 deducted from the worker's salary on May 2021 was refund to the worker.		
Root Cause Analysis:	Wrong interpretation by the company the contents of the employment contract (Clause 11) on the responsibility to pay a worker's medical costs where the contract stated that medical cost would be fully borne by the company.		
Corrective Actions:	The Clause 11 in the Foreign Worker Contract Agreement was revised to ensure it would adequately explained that only medical cost related to occupational would be borne by the company and the revised contract agreement was agreed by both parties.		
Assessment Conclusion:	From the on site verification;- The management already pay back the workers, the payment voucher (CV1221-01) with total RM 85 dated 22/12/2021 to Benhaimar Kalinggalan Dorongan was verified during assessment.		

	<p>After this cases, the management conducted the training/briefing record dated 22/12/2021 regarding to clause 11 under employment contract with Mr. Benhaimar Kalinggalan Dorongan</p> <p>From the verification on employment contract, the new employment contract been revise by Carotino Asia under clause 11 regarding <i>Cuti Sakit dan Perubatan</i> stated "<i>Majikan akan melantik pakar -pakar perubatan atau klinik untuk perubatan pekerja dengan perbelanjaan perubatan ditanggung sepenuhnya oleh Majikan sekiranya sakit akibat pekerjaan sahaja. Jika Pekerja sakit dan harus diwadkan, Majikan akan memberikan fasiliti kelas maksima 60 hari , pembayaran perubatan akan ditanggung sepenuhnya oleh Majikan sekiranya sakit akibat pekerjaan sahaja .</i>"This employment contract revise on 22/12/2021.</p> <p>Due to this changes of employment contract the management establish the Guidelines on workers employment terms and conditions for Sabah estate workers (Doc. Ref. No. E/009-08/2021) established dated 22/12/2021.</p> <p>Verified as per sampling 5 other workers on their revised employment contract Sampling on employment contract as per below:- ATO0828 AE200768 ATO0680 ATO0613 AE200498</p> <p>The contract already amend by the company to the sampling workers on clause 11 dated 22/12/2021 verified as per record. From the interview with the workers, they aware regarding amended clause 11. Therefore the Major NC was closed on 14/1/2022.</p>
--	--

Opportunity for Improvements	
OFI #	Description
OFI 1	<p>Indicator 6.2.4</p> <p>The Certification Unit is already providing adequate welfare, housing and various amenities to all workers. Even if the Employees’ Minimum Standard of Accommodation and Amenities Act 1990 is not applicable to Sabah, as an opportunity for improvement, guidance provided by the Employees’ Minimum Standard of Accommodation and Amenities Act 1990 should be followed with regards to:</p> <ul style="list-style-type: none"> - Fortnightly visits by the VMO (as opposed to the current fortnightly visits) as this would enable the VMO to attend to patients more frequently at the estate/mill clinics; - Provision of milk at the creche as this would provide appropriate nutrition to children below 1 year, and from 1 - 6 years. <p>This is also in tandem with the RSPO MYNI (Revised April 2021) Annex 2 Guidance for Indicator 6.2.4. which states that “for Sabah & Sarawak, in the absence of any State enactment/ ordinance, the Unit of certification should be guided by the provision under the Workers’ Minimum Housing & Amenities Act”.</p>

Positive Findings	
PF #	Description
PF 1	Good commitment and corporation from the management.
PF 2	Well maintained labour quarters at the mill and all estates.
PF 3	Positive feedbacks from internal and external stakeholders.

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2036145-202103-M1	Date Issued	31/3/2021
Due Date	29/6/2021	Date of nonconformity Closure	30/4/2021
Clause & Category (Critical / Minor)	3.4.3 (Critical/Major)		
Statement of Nonconformity:	The environmental management plan was not effectively implemented		
Requirement Reference:	The social and environmental management and monitoring plan is implemented reviewed and updated regularly in a participatory way.		
Objective Evidence:	<p>Melewar estate Div 2 and Asia POM:</p> <p>The operating units has established environmental management plan. Under section pollution stated oil trap to be build and maintain appropriate internal to prevent oil spillage reach second compartment of the trap.</p> <p>Sighted at the engine room in Melewar estate Division 2, there is evidence of oil in all 3 compartment and flow into the drain.</p> <p>Sighted in Asia palm Oil Mill, there is evidence of residue from the oil trap around the drain and oil trap.</p>		
Corrections:	<p>The management has held an emergency meeting on 02/04/2021 (Attachment#1) to take action to address this problem, which has appointed a mill supervisor to ensure cleaning can be done in accordance with SOPs and representative from the management to monitor and control the situation from recurrence. In addition, the oil trap cleaning scheduled has also been made on a monthly basis and the provision of re-training and briefing to the operators on duty to unde stand the requirement of the work directed.</p>		
Root Cause Analysis:	Asia Palm Oil Mill, there evidence of residue from cleaned oil traps being placed on the ground/ grass surface around drains and oil traps.		
Corrective Actions:	<p>-Appointment of PIC who responsible for monitoring of oils trap in mill area as following:</p> <ol style="list-style-type: none"> 1) Mr. Samsi Bin Laipan (Management) 2) Mr. Wahid Bin Suddin (Mill Supervisor) 3) Mr. Zakaria Bin Osman (Mill Supervisor) <p>-Development and implementation of monthly maintenance scheduled and inspection checklist for oil trap</p>		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<p>-Review the aspect and impact of the in house SEIA improvement plan to improve and make additions to the shortcomings found in. (Attachment#4)</p> <p>-Re-training and briefing to be given to personnel in charge and operator of oil trap maintenance is properly done as per guidelines and standards.</p>
Assessment Conclusion:	<p>ASA1_4</p> <p>The monitoring plans are updated every two years, and other actions that require actions are carried out immediately. The latest review at Melewar 2 Estate was carried out on 24 Aug 2021, with inputs provided by stakeholders during JCC and gender committee meetings, and complaints/feedbacks received. The monitoring plans contain impacts identified, action plan, action taken, timeframe, further action/review, person in charge, and timeframe for implementation.</p> <p>On the verification of appointment letter dated 2/4/2021 and disposal of scheduled waste in accordance to environmental recommendation dated 21/9/2021, from the observation no recurrence issue has been sighted during assessment thus the Major NC remained closed.</p>

Opportunity for Improvement	
OFI#	Description
OFI 1	<p>OFI Statement: Nil</p> <p>Verification / Follow-up actions:</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1554102-201709-M1	Major	5.3.3	9/11/2017	Closed on 8/1/2018
1554102-201709-N1	Minor	4.1.3	9/11/2017	Closed on 16/11/2018
1706395-201811-M1	Major	2.1.1	16/11/2018	Closed on 8/2/2019
1706395-201811-N1	Minor	2.1.2	16/11/2018	Closed on 7/11/2019
1845883-201911-N1	Minor	4.7.5	7/11/2019	Closed on 30/11/2020
1993690-202011-M1	Critical	2.3.1	1/12/2020	Closed on 29/1/2021
2036145-202103-M1	Critical	3.4.3	31/3/2021	Closed on 30/4/2021
2140837-202112-M1	Critical	6.2.1	9/12/2021	Closed on 14/1/2022

3.4 Stakeholders and previous land owner / user 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 *Asia Production Unit*. 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

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

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.

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Communities	Kedai Ching Hui Min	face to face interview
Communities	Klinik Mabelo	face to face interview
External	Hardware supplier	phone interview
External	Recruitment Agent	phone interview

Stakeholders comment	
1	<p>Feedbacks: Grocery shop Kedai Ching Hui Min at Hwa Li 3 Estate confirms that monthly price monitoring is being done by the Hwa Li 3 management team. The shop also was requested to ensure supplies are adequate especially during the Covid-19 pandemic where movements are restricted.</p> <p>Audit Team verification and response: Sighted price lists of goods sold at the shop which is used by Hwa Li 3 management for purposes of price monitoring. No further issue of concern.</p>
2	<p>Feedbacks: VMO from Klinik Mabelo (branch clinic is situated in Kg Paris). Workers are sometimes referred to the clinic if the illnesses could not be managed by the estate health assistants. Among the work of the VMO would be to attend to patients during his visits to the estates and mill, visit linesites, creches, etc.</p> <p>The VMO agrees that under Act 466:</p> <p>a. The creche should be supplying playthings and milk. The VMO suggested that if the certification unit were to supply milk, then Langkah 1 (for 0 – 1 year) and Langkah 2 (1 – 6 years) be supplied so that children of various ages can benefit. Condensed milk is to be avoided.</p> <p>b. The VMO is required to visit the mill and estate clinics once a fortnight. Currently, the visits to the mill and all estates within the certification unit are only carried out once a month. If required, the VMO is able to increase the frequency to one a fortnight.</p> <p>Audit Team verification and response: Although Act 466 is not applicable to Sabah, the RSPO MYNI Annex 2 Guidance (Revised April 2021) for Indicator 6.2.4 at page 120 states that in the absence of any State enactment/ordinance, the unit of certification should be guided by the provision under the Workers’ Minimum Housing & Amenities Act.</p>

3	Feedbacks: Hardware supplier interviewed confirmed that dealings are done in a fair and transparent manner with the issuance of formal purchase orders, and that payments are received in a timely manner. There are no grievances against the certification unit. There is a good business relationship with the certification unit.
	Audit Team verification and response: No further issues.
4	Feedbacks: Recruitment agents explained the process of passport and permit renewals for workers and their dependents. The recruitment agents will contact the certification unit to inform when the programme for passport application/renewal is open. The certification unit would then submit details of the workers and their dependents together with the supporting documents for the agents' submission to the Indonesian consulate, and thereafter to the Immigration Department. The Indonesian consulate would also visit the estates to help with the regularisation process. However, since the Indonesian consulate could only visit on weekends, there would be a long wait due to the long queue. The passport renewal process for dependents can take anytime between 1 month (if all documents are complete) to 6 months (if documents are not available). The recruitment agents confirmed that the Mill and Estates have submitted their list of workers' dependants for passport applications/renewals. These application have been proceed and now pending approval from the authorities.
	Audit Team verification and response: Sighted the list of dependents who have already been issued with passports, and those whose names have been submitted to the agents for processing.

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Nil					
Land that are have undergone second replanting					

Previous land owner / user comment	
	Feedbacks: Nil
	Audit Team verification and response:


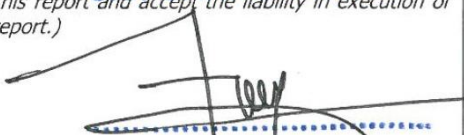
3.5 Impartiality and conflict of interest

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

**RSPO P&C Public Summary Report
Revision 12 (Jun 2021)**

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Asia Palm Oil Mill and supply base has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Asia Palm Oil Mill and supply base is certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Muhamad Naquiuddin Mazeli	Name: Seow Chee Chiang
Company Name: BSI Services (M) Sdn Bhd	Company Name: Carotim / J. C. Chang Group
Title: Lead Auditor	Title: Sr. Manager.
Signature: 	Signature: <i>(I the undersigned, being the 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>  Seow Chee Chiang Senior Manager
Date: 24/1/2022	Date: 28/01/2022

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Among the documents available for public review include the following policies on environment, equal opportunities, safety and health, sexual harassment, social and human rights, corruption prevention, child protection. Additionally, these documents are also available at the estate and mill offices for review. Other documents available for public review are documents related to OSH, social impact and improvement, consultation and communication procedure, details of complaints and grievances, negotiation procedures, records of contributions and donations to local communities, joint consultative committee and gender committee meeting minutes, estate map and boundary, licenses and permits, continuous improvement plan, public summary of certification assessment report, etc.</p> <p>Documents for the group are available at the website http://www.carotino.com/group-mission-and-management-plan.aspx</p>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Information is provided in both English and Bahasa Malaysia and are accessible to relevant stakeholders. Examples were as follows:</p> <p>a. Information required during the visit to the Mill by Department of Occupational Safety and Health (Sandakan branch) on 2 December 2021 was made available in Bahasa Malaysia and English.</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		b. DOE Sandakan’s request to the Mill via letter dated 18 Nov 2021 on competent person to maintain and handle POME treatment system, and the Mill’s response on 23 Nov in Bahasa Malaysia (APOM/JAS/2021/11-01).	
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	Evidence is available that records of request for information and the responses are maintained. Sighted during the audit were the following: a. Request for information dated 24 Sept 2021 received from the estate shop Mahee Trading on the issue of Covid-19 SOP and Melewar 2’s estate management’s response were sighted. b. Requests from workers at Hwa Li 3 to withdraw their ‘buffalo savings’ dated 1 & 13 Nov 2021 as well as management’s response confirming the withdrawal were also available and sighted during the audit. c. Mill worker’s request for information if he could bring his family members to visit during Covid 19 and management’s response were maintained and sighted.	Complied
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -	Consultation and communication procedures are documented under SOP on Mechanisms for Communications and Consultation Ref E/004-8/2019 dated 12 Aug 2019. This SOP was explained to stakeholders during previous annual stakeholder meetings. However, no external stakeholder meetings could be held due to the Covid-19 restriction movements. This was evidenced by letters sent by the Estates and Mill to their respective stakeholders on 20 September 2021 (Melewar 2 Estate), 3 August 2021 (Hwa Li 3 Estate) and on 23 August 2021 (Mill) explaining the same to their stakeholders. Attached with the email to stakeholders were also the Complaints and Grievance Procedures.	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		Despite the movement restrictions, all stakeholders were given the opportunity to consult and communicate using stakeholders' response form which they can email, WhatsApp or telephone to the Estates and Mill. Among the response received was from a neighboring plantation which confirmed that water quality samples taken near Simpang Putih flowing from nearby areas satisfactory had no signs of pollution, good communication and relationship between estates on sustainability issues, sharing of information and the absence of any negative impacts. Another response was received from a supplier confirming good existing relationship and communication.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	Each operation units within Asia Palm Oil Mill and supply base estates have their own list of stakeholders. The stakeholders comprise relevant government agencies such as the Labour Department, Immigration Department, Department of Environment, Department of Safety and Health, Philippines Embassy and Indonesian Consulate offices. Also included are neighboring estates and smallholders, neighboring villages, schools, canteen/shop operators, suppliers and contractors, etc. Contact details for each stakeholder and their nominated representatives are also available. Melewar and Asia Oil Palm Estate 2 Estates updated their stakeholder lists on 25 Sept 2021 and 1 September 2021, respectively.	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	A policy for ethical conduct is available in JC Chang's Corruption Prevention Policy dated 4 Sept 2015. This Policy prevents corruption and applies to all entities within the company including contracted third parties and consultants in relation to their work with/for the group. This Policy was signed by the Mill Director on 4 September 2015 and is available in English and Malay language. Awareness on	Complied

		<p>this Policy are being held for all newly-recruited employees where they acknowledged their understanding of the briefing my appending their thumbprints on the documents. Records of these were available and verified at all the Estates and Mill. Additionally, workers are also given refresher trainings during morning muster.</p> <p>Contractors were also required to comply with this Policy as evidenced by the crude palm oil Transportation Agreement between the Mill and Pengangkutan Tera Sdn Bhd which is valid until 30 June 2023 where the transporter signed a Sustainability Compliance Contract undertaking compliance with ethical conduct and corruption prevention.</p>	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>Among the system in place include:</p> <ul style="list-style-type: none"> a. Annual internal audits; b. Signing of Sustainability Compliance Contract by the contractors. Sighted were the contracts between Melewar 2 Estate and Agensi Pekerjaan Hollywood Sdn Bhd dated 17 July 2020 and with Agensi Pekerjaan MNK Sdn Bhd dated 17 March 2021. c. Purchase authority limits where cheques need to be signed by 2 people, and that any purchases exceeding RM30,000 require the approval at HQ level. <p>Awareness training for this Policy was given at the Mill on 1 Feb 2021. Interviews with employees also confirmed their understanding of this Policy.</p>	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The Unit of Certification complies with legal requirements	Asia Production Unit have continued to comply with all applicable legal requirements as per indicator. Compliance towards all	Complied

	<p>- Critical (Major) compliance -</p>	<p>applicable law and regulations are monitored by the operating units and sustainability team. Asia Production Unit have obtained and renewed licenses and permits as required by the law. Sample of license and permits viewed are as follows.</p> <p><u>Asia Palm Oil Mill</u></p> <ol style="list-style-type: none"> 1. MPOB License; MPOB License Number: 500143104000; License validity Period: 01/12/2021 – 30/11/2022; Processing Capacity: 330, 000 mt a year. 2. DOE License – License to Occupy and Use of Premise; License Number; 003557; License Expiry Date: 30/06/2022 3. License to Employ Non-Residential Workers; License Number; JTK.H.KBN.600-4/1/10401/0063; License validity period; 04/01/2021 – 03/01/2022. 4. Permit Barang Kawalan Berjadual; Serial Number: P(S005393); Reference Number: PPDNKK.SDK.07/2018(SK); Description: Diesel; Storage Capacity: 24,000 Litres; License Validity Period: 25/10/2021 – 24/10/2024. <p><u>Asia Oil Palm Estate Div. 2</u></p> <ol style="list-style-type: none"> 1. MPOB License; License Number: 502330302000; License Validity Period: 01/07/2021 – 30/06/2022. 2. MPOB License (Nursery); License Number: 618070011000; License Validity Period: 01/04/2021 – 31/03/2022. 3. Permit Barang Kawalan Berjadual; Serial Number: PK (S002646); Reference Number: KPDPNHEP.LDT.600.5/4 (37/2021) PK; Description: Petrol; Storage Quantity: 200 Litres/Week; License Validity Period: 28/07.2021 – 27/01/2022. 	
--	--	---	--

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p><u>Melewar Estate Div. 2</u></p> <ol style="list-style-type: none"> 1. MPOB License (FFB); License Number; 502932802000; Estate Area: 2023.4 Hectare; License Validity Period: 01/10/2021 – 30/09/2022 2. MPOB License (Nursery); License Number: 618072011000; License Validity Period: 01/04/2021 – 31/03/2022. 3. Permit Barang Kawalan Berjadual; Reference Number: KPDNHEP/LTD/600.4/4(22/2009)P; Serial Number: P(S002757); Description: Diesel; Storage Capacity: 18,000 Litres; License Validity Period: 01/03/2021 – 01/03/2022. 4. Energy Commission – Private Installation License; License Number: 2021/01564; Serial Number: 50660; Installation Capacity Not Exceeding 125 kW; License Validity Period: 08/08/2021 – 07/08/2022. <p><u>Hwa Li Estate Div. 3</u></p> <ol style="list-style-type: none"> 1. MPOB License (FFB); License Number: 503266302000; License Validity Period: 01/12/2021 – 30/11/2022. 2. MPOB License (Nursery); License Number: 618629011000; License Validity Period: 01/08/2021 – 31/07/2022. 3. Permit Barang Kawalan Berjadual; Reference Number: KPDNHEP.LDT.600-4/4(17/2004) P; Serial Number: P (Q 00006 LDT); Description: Diesel; Storage Quantity: 40,000 Litres; License Validity Period: 19/01/2021 – 18/01/2024. 4. License to Employ Non-residential Workers; license Number: JTK.H.KBN.600-4/1/1/01261/0067; License Validity Period: 04/12/2021 – 03/12/2022. 	
--	--	---	--

		5. Energy Commission – Private Installation License; License Number: 2021/01281; Serial Number: 50058; License Validity Period: 25/05/2021 – 24/05/2022.	
2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations. - Minor compliance -	<p>Identification and documentation of applicable legal requirements is guided by the documented procedure titled SOP on Mechanism to Trace Changes in Legal Requirements (Doc Ref Number: E/005-07/2017); Doc Date: 06/01/2017.</p> <p>Register of law changes were available for verification in the operating units. The register has info about Legal and Other Requirements, (News Flash/ Subject), Source and Date. Melewar Estate Div. 2 have reviewed the changes in law on 09/07/2021. Hwa Li Estate Div. 3 has reviewed the legal register on March 2021.</p> <p>Tracking system to identify changes in the relevant regulations were available through the head office, website information and is communicated from the Group Head Office. Sighted the latest review to include new updates for Employees Minimum Standards of Housing, Accommodation and Amenities (Regulations 2021) and Akta Pencegahan dan Pengawalan Penyakit Berjangkit 1988.</p> <p>On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operation. Tracking system on any changes in the law had been well implemented.</p>	Complied
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance -	<p>Guidelines on Legal or Authorised Boundaries are guided by the documented procedure Guidelines on Field Blocking and Boundary Maintenance; Doc Ref Number: B/003-04/2017; Doc Date: 07/07/2017.</p> <p>Legal boundaries were clearly demarcated at the estate via a few methods such as planting of teak trees, boundary trenching, marking of trees and using GI pipes painted with white and red</p>	Complied

		stripes. This was verified during the field visits at the estate’s boundaries with its adjacent stakeholders.	
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is maintained. - Minor compliance -	A list of contracted parties, stakeholders and suppliers were maintained by all operating units which was updated on a yearly basis and as and when there are new additions to be included in the list. The list was available for verification at all operating units.	Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -	Contractor’s Contract Agreements were sampled and were confirmed to include specific clauses on meeting applicable legal requirements. Reviewed contract agreements as follows. 1. <u>Asia Palm Oil Mill</u> - Pengangkutan Dagang Tera Sdn Bhd; Transportation Agreement; Date: 01/07/2021. 2. <u>Melewar Estate Div 2.</u> - Agensi Pekerjaan Hollywood; Compliance Clause: E023-01/2019; Date: 12/08/2019.	Complied
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection. - Minor compliance -	Contractor’s Contract Agreements were sampled and were confirmed to include clauses disallowing child, forced and trafficked labour. Reviewed contract agreements as follows. 1. <u>Asia Palm Oil Mill</u> - Pengangkutan Dagang Tera Sdn Bhd; Sustainability Compliance Contract with Operation Unit; Date: 28/07/2020. 2. <u>Melewar Estate Div 2.</u> - Agensi Pekerjaan Hollywood; Compliance Clause: E023-01/2019; Date: 12/08/2019.	Complied

Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>Asia Palm Oil Mill receives certified and non-certified FFB to be processed in the mill. The mill receives RSPO Certified FFB from 3 of its own supply base estates and diverted FFB certified FFB from its sister mill (Melewar Palm Oil Mill). The mill also receives non-certified FFB from 3rd party Outgrowers and Estates. There was a total of 6 3rd party suppliers that provide the non-certified FFB to the mill.</p> <p>Information on geo-location of FFB origins, evidence of land ownership, documents of claims (weighbridge tickets and Delivery Chits) and valid MPOB licenses were available for verification. Sampled the documents as below.</p> <ol style="list-style-type: none"> 1. <u>KJS Resources Sdn Bhd</u> <ul style="list-style-type: none"> - MPOB License; License Number: 544397002000; Estate Area: 931.46 Ha; License Validity Period: 01/12/2022 – 30/11/2022. - Sampled Land Title; Country Lease Number: 095329294. 2. <u>Meran Sdn Bhd</u> <ul style="list-style-type: none"> - MPOB License; License Number: 522051002000; Estate Area: 858.2 Ha; License Validity Period: 01/07/2021 – 30/06/2022. - Sampled Land Title; Country Lease Number: 095311881. 3. <u>Kebaco Sdn Bhd</u> <ul style="list-style-type: none"> - MPOB License; License Number: 522052002000; Estate Area: 737.32 Ha; License Validity Period: 01/07/2021 – 30/06/2022. - Sampled Land Title; Country Lease Number: 095311872 4. <u>Tapak Jutamaju Sdn Bhd</u> <ul style="list-style-type: none"> - MPOB License; License Number: 548575002000; Estate Area: 189.28; License validity Period: 01/04/2021 – 31/03/2022. 	Complied

		<ul style="list-style-type: none"> - Sampled Land Title; Country Lease Number: 095324959. 5. <u>Sentrabayu Industries Sdn Bhd</u> - MPOB License; License Number: 503662602000; License Validity Period: 01/04/2021 – 31/03/2022. - Sampled Land Title; Country Lease Number: 095325876. 6. <u>Benar Waris Sdn Bhd</u> - MPOB License; License Number: 502523302000; License Validity Period: 01/07/2021 – 30/06/2022. - Sampled Land Title; Country Lease Number; 115360346 & 095311416. 	
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>The mill only receives FFB from its own supply base estates, its sister properties and external estates and out growers. There were no FFB traders or indirectly resourced FFB received by Asia Palm Oil Mill. Therefore, this indicator is not applicable.</p>	Not Applicable
<p>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</p>			
<p>Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>Asia production unit has continued its commitment to long term sustainability and improvement through a capital expenditure programme. The management has forecasted 3 years business plan from FY 2021/22 until 2023/24. In the 3 year business plan include items as follows:-</p> <ol style="list-style-type: none"> 1. FFB and Yield/Ha, OER and KER 2. Mature upkeep and cultivation cost 3. Mature Harvesting Collection Cost 4. Immature Cost 5. General Charges and others. 	Complied

3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>Long ranges replanting programme was established for JC Chang Group estate, 25 years plan until 2041. The group has updated the guidelines on group Long term replanting planning, Replanting programme as per below:-</p> <table border="1" data-bbox="1137 507 1930 738"> <thead> <tr> <th>Estate</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>Melewar Estate 2</td> <td>155</td> <td>237</td> <td>202</td> <td>172</td> <td>150</td> </tr> <tr> <td>Asia oil palm Estate 2</td> <td>269</td> <td>209</td> <td>196</td> <td>221</td> <td>209</td> </tr> <tr> <td>Hwa Li Estate 3</td> <td>270</td> <td>325</td> <td>355</td> <td>274</td> <td>395</td> </tr> </tbody> </table>	Estate	2022	2023	2024	2025	2026	Melewar Estate 2	155	237	202	172	150	Asia oil palm Estate 2	269	209	196	221	209	Hwa Li Estate 3	270	325	355	274	395	Complied
Estate	2022	2023	2024	2025	2026																						
Melewar Estate 2	155	237	202	172	150																						
Asia oil palm Estate 2	269	209	196	221	209																						
Hwa Li Estate 3	270	325	355	274	395																						
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>Asia production unit conducted the management review meeting (MRM) on annually basis. Latest MRM was conducted on 26/07/2021. Among agenda discuss during the meeting as follows:-</p> <ul style="list-style-type: none"> • Previous minutes meeting • Outstanding issues/follow up from previous MRM • Result of external assessment for APU • Result of internal assessment for APU • Process performance and product conformity • Customer/stakeholder feedback • Changes could affect the management system • Complaint and Grievances • And Improvement of effectiveness of Management system 	Complied																								

Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.

<p>3.2.1</p>	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>The action plan for continuous improvement is taken based on the social assessment done. At Melewar 2 Estate, the review done on 24 August 2021 has identified and implemented the following issues for continuous improvement</p> <p>a. Immigration status of workers' dependants' and available amenities for them. Continuous action taken include identifying newly born children and arrange for legalisation. Required amenities include education facilities at the Community Learning Centre (CLC) located at Asia Oil Palm 2 Estate.</p> <p>b. Illegal access via estate boundary by unidentified third parties: Continuous action taken include routine inspections by staff and mandore along the boundary, communication to all surrounding stakeholders during stakeholder meeting, and the destruction of foot bridges and illegal paths leading to the Estate.</p> <p>c. Drug abuse. Continuous action taken is periodical urine tests and reminders made during muster.</p> <p>d. Continuous improvement of workers' linesite is also ongoing. Sighted at Asia Palm Oil Mill and Asia Oil Palm 2 Estate the approved FY2021-2024 budget for accommodation upkeep, maintenance, medical, employee welfare, and repairs.</p>	<p>Complied</p>
<p>3.2.2</p>	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE: The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p>	<p>The RSPO metrics for Asia Palm Oil Certification Unit was completed using version 2.1. The data records were sampled and verified against data collected at the site such as worker records, accident records and grievance records. All records were found to be accurately reported.</p>	<p>Complied</p>

	<p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>		
<p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
<p>3.3.1</p>	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Estates and Oil Mill have maintained and revised if required, the Documented Standard Operating Procedures file that contains both the safe operating procedures and the procedures to implement the various major field operations. For example, among others, the Estate SOP Manual has procedures category for the following operations:</p> <ul style="list-style-type: none"> • Road and Terrace construction for New Planting and Replanting (A/005-01/2008) • Nursery Establishment and Practices (A/006-01/2008) • Field planting (A/007-02/2011) • Pruning and Frond stacking (B/001-01/2008) • Weeding Regime & Practices ((B/004-01/2008) • Riparian Buffer Zone (C/001-02/2009) • Justifications for Pesticide Usage under IPM (Insecticide, Fungicide & Rodenticide) (B/008-14/2016) • Justifications for Pesticide Usage under IPM (Weedicides) (B/009- 10/2015) • FFB Evacuation with MTG (D/003-01/2008) • FFB Harvesting and Evacuation (D/004-04/2015) • Fertiliser receipts, management and application (H/001-03/2016) • Integrated Pest & Disease Management (L/001-05/2014) • Rat control and baiting (L/002-07/2016) 	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<ul style="list-style-type: none"> • Buffalo management – SOP on buffaloes assisted harvesting (BAH) (K/002/01/2018) <p>Standard Operation Procedure (SOP) for Asia POM contains the procedures for all activities as below:</p> <ul style="list-style-type: none"> • Reception Station (Q/019-05/2019) • Grading Station (Q/019-05/2019) • Threshing Station (Q/020-04/2019) • Press Station (Q/021-03/2016) • Clarification Station (Q/022-04/2019) • Depericarper Station (Q/023-04/2017) • Nut & Kernel Station (Q/024-04/2019) • Boiler Station (Q/025-04/2016) • Engine Room Station (Q/026-04/2016) • Water Treatment Plant (Q/027-04/2019) • Solvent Plant (CCP/08-02/2019-SP) • Compost Plant (CCP/08/02/2019-CP) • Biogas SOP (section 1-7) (AOM-SOP-V2-15-RSPO.doc, version:2 dated 21/6/15) 	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>There are few mechanism to check a consistency such as Internal Control Assessment dated 8-10/7/2021 by Ms Hasirah Tahir in Melewar estate Div 2 . Another implementation was Estate Report by manager Mr Dulmi Mullar dated Oct 2021 for Financial 2020/21, this report to ensure implementation of SOP in estate based on Budget as per verification. In Asia POM, the visit will be conducted on 13 - 17/12/2021 by Mr Selva Nathan (Mill Controller).</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	The operating unit visited maintain all visit report for General Manager, Internal Control Team and Monthly performance report and action taken for the reports. Reviewed the visit reports as follows:- Internal Control Assessment dated 8-10/7/2021 by Internal Control Team in Melewar estate Div 2. Internal Control Assessment dated 16-18/7/2021 by Internal Control Team in Asia.	Complied
Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -	There are no new plantings or new operations within the certification unit. The initial Social and Environmental Impact Assessment carried out by Wild Asia in a participatory manner involving stakeholders has been documented in document dated 26 May 2011.	Complied
3.4.2	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders. - Minor Compliance -	Social and environmental management and monitoring plans have been developed with participation of affected parties, i.e., internal and external stakeholders and inputs obtained during JCC and Gender Committee meetings. Among them include social impacts identified at Melewar 2 Estate were foreign worker permit issue, delay in the renewal of immigration documents and dependents' pass due to Covid-19 restrictions. The agreed management and monitoring plan was to liaise with the recruitment agents, consulates and Immigration Department for permit and passport renewals/issuance. At the Mill, the issue of workers' increased expenditure during Covid-19 lockdown was also identified. The agreed management	Complied

		<p>and monitoring plan is to have a meeting with the grocery shop owner to ensure sufficient supplies and stock at reasonable prices.</p> <p>Based on the above, there is evidence that the social monitoring plans were developed with participation of affected stakeholders.</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The monitoring plans are updated every two years, and other actions that require actions are carried out immediately. The latest review at Melewar 2 Estate was carried out on 24 Aug 2021, with inputs provided by stakeholders during JCC and gender committee meetings, and complaints/feedbacks received. The monitoring plans contain impacts identified, action plan, action taken, timeframe, further action/review, person in charge, and timeframe for implementation.</p> <p>Among the most recent social impacts identified at Melewar 2 Estate were foreign workers' permit issue, delay in the renewal of immigration documents and dependents' pass due to Covid-19 restrictions. At the Mill, the issue of workers' increased expenditure during Covid-19 lockdown and difficulty in finding cheaper options.</p> <p>Evidence was available that the social management and monitoring plan was implemented when these impacts were immediately addressed by having a meeting with the grocery shop owner, Mr Chin Kui Hui where it was agreed that a monthly price list be submitted to the Mill management for price comparison and monitoring on 26 Nov 2021.</p>	Complied
<p>Criterion 3.5: A system for managing human resources is in place.</p>			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>The procedures for recruitment, selection, hiring, promotion, retirement and termination are documented under Procedure of Recruitment Selection, Hiring, Promotion, Retirement and Termination, Doc Ref No. E020-01/2019 dated 12 August 2019.</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		This procedure is available and briefed to works periodically during muster.	
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	Employment procedures are implemented and all relevant records duly maintained. This was evidenced from the sampled employment files of workers. Each file contains job application forms, relevant certificates if available, personal details, copies of passports or NRICs, medical reports, assessment form, employment contract, training records, etc.	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -	<u>Asia Palm Oil Mill</u> 1. HIRAC was available to address all the risks and hazards associated to the operations in the estate. The HIRARC was reviewed on 24/02/2021. 2. Chemical Health Risk Assessment was conducted in the mill in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000. CHRA Report Reference Number: HQ/15/ASS/00/364-2020/12; CHRA Assessor: Anthony Astral Chan (HQ/15/ASS/00/364); Date of Assessment: 27/06/2020. 3. Medical Surveillance Programme has been performed successfully for the year 2021 for the mill workers exposed to hazardous chemicals and fumes. A total of 8 workers have been examined on 04/08/2021 at Klinik Mabello (Paris) Sdn Bhd and the results indicated that there were no workers with abnormal results. 4. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. Noise Risk Assessment (NRA) has been conducted by Sherman Services & Supply, Mr. Gabriel Sherman Zabela (MyKKP)	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>Registration Number: HQ/14/PEB/00/125) on 06 - 07/10/2019. NRA Report (Report Number: SSS/NOISE-0164/19) available for verification. The recommendation stated by the assessor have been affectively addressed as verified.</p> <p>5. An audiometric testing was done on 04/08/2021 for 79 mill employees deemed to be exposed to excessive noise in the mill. The test was conducted by Klinik Mabello (Paris) Sdn Bhd. The report indicated that 51 workers had normal hearing, 25 workers with hearing loss and 2 workers with Standard threshold shift. The workers with STS have been plaed for a retest in January 2022. The rest of the workers with hearing loss.</p> <p><u>Asia Complex Estates</u></p> <p>a. HIRARC was available to address all risk and hazards associated to the operations in the estates. Verified the HIRARC for Ramp, Manuring, Harvesting Spraying, Workshop and Genset Operation. Verification done on the documentations and operations indicated that all the risk controls were adhered to.</p> <p>b. Chemical Health Risk Assessment was conducted in the estates in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000. The CHRA Report were available for the estates visited as follows.</p> <p>- <u>Asia Oil Palm Estate 2</u> CHRA Report Reference Number: HQ/15/ASS/00/364-2020/7; CHRA Assessor: Anthony Astral Chan (DOSH Registration</p>	
--	--	--	--

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>Number: HQ/15/ASS/00/364; Date of Assessment: 25/06/2020.</p> <ul style="list-style-type: none"> - <u>Melewar Estate Div 2</u> CHRA Report Reference Number: JKKP KIM127/453/6 (30) - 2018/021; CHRA Assessor: Mohd Amin Bin Adrah (JKKP KIM127/453/6(30); Date of Assessment: 27/08/2018; Date of Report Submission: 17/10/2018. - <u>Hwa Li Estate Div 3</u> CHRA Report Reference Number: JKKP KIM127/453/6 (30) – 2018/022; CHRA Assessor: Mohd Amin Bin Adrah (JKKP KIM127/453/6(30); Date of Assessment: 27/08/2018; Date of Report Submission: 18/10/2018. <p>c. Medical Surveillance were conducted in the estates based on the recommendation of the CHRA for workers exposed to hazardous chemicals. Results of annual medical surveillance were available in the estates for verification as follows.</p> <ul style="list-style-type: none"> - <u>Asia Oil Palm Estate 2</u> The medical surveillance programme for they year 2021 has been performed on 14/03/2021 at Mabello Group of Clinics for 43 workers identified to be exposed to hazardous chemicals in the estate. The results indicated that all workers were fit to work. - <u>Melewar Estate Div 2</u> The medical surveillance programme for the year 2021 has been performed on 05/08/2021 for 33 employees at Klinik Mabello (Paris) Sdn Bhd. The results indicated all workers were certified fit to work with no occupational related medical conditions. 	
--	--	--	--

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<ul style="list-style-type: none"> - <u>Hwa Li Estate Div 3</u> The medical surveillance programme for the year 2021 has been performed on 12/08/2021 for 55 employees at Klinik Mabello (Paris) Sdn Bhd. The results indicated all workers were certified fit to work with no occupational related medical conditions. d. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. The NRA Report were available for verification at all the sampled sites. The recommendation stated by the assessor have been affectively addressed as verified. - <u>Asia Oil Palm Estate 2</u> Noise Risk Assessment (NRA) has been conducted by Sherman Services & Supply, Mr. Gabriel Sherman Zabela (MyKKP Registration Number: HQ/14/PEB/00/125) on 08/10/2019. NRA Report (Report Number: SSS/NOISE-0166/19) was available for verification. - <u>Melewar Estate Div. 2</u> Noise Risk Assessment (NRA) has been conducted by Sherman Services & Supply, Mr. Gabriel Sherman Zabela (MyKKP Registration Number: HQ/14/PEB/00/125) on 10/10/2019. NRA Report (Report Number: SSS/NOISE-0168/19) available for verification. - <u>Hwa Li Estate Div 3</u> Noise Risk Assessment (NRA) has been conducted by Sherman Services and Supply, Mr. Gabriel Sherman Zabela (MyKKP Registration Number: HQ/14/PEB/00/125) on 09/10/2019. 	
--	--	--	--

**RSPO P&C Public Summary Report
Revision 12 (Jun 2021)**

		<p>NRA Report (Report Number: SSS/NOISE-0167/19) was available for verification.</p> <p>e. Audiometric Testing was done in the estates based on the recommendation provided in the Noise Risk Assessment in compliance with OSHA 1994 – OSH (NOISE Exposure) Regulations 2019. Reports for the annual audiometric test was available for verification.</p> <p>a. <u>Asia Oil Palm Estate 2</u> Audiometric Test was done on 07/03/2021 for 24 workers deemed to be exposed to excessive noise in the estate. The results indicated that 14 workers had normal hearing and 11 workers had hearing loss including 1 worker with STS. The worker with STS has been retested on 02/07/2021. The rest of the workers have been referred to OHD on 16/05/2021. All results were available for verification.</p> <p>b. <u>Melewar Estate Div. 2</u> Audiometric Test was done on April 2021 for 8 employees deemed to be exposed to excessive noise by Klinik Mabello (Paris). The results indicated that 3 workers have normal hearing and 5 workers had hearing loss. Out of the 5 workers, 1 worker was categorised with Standard Threshold Shift and required to undergo a retest within 3 months. The retest has been conducted for the mentioned worker on 04/07/2021 and results available for verification. The recommendations provided have been addressed by the estate accordingly.</p> <p>c. <u>Hwa Li Estate Div 3</u> Audiometric Test was done on April 2021 for 40 employees deemed to be exposed to excessive noise by Klinik Mabello (Paris). The results indicated that 23 workers have normal</p>	
--	--	---	--

		hearing and 16 workers had hearing loss. Out of the 16 workers, 3 workers were categorised with Standard Threshold Shift and required to undergo retest within 3 months. The workers were referred to OHD on 05/06/2021 and the audiometric retest was conducted on 02/07/2021 for 2 workers as recommended by the OHD.					
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	The effectiveness of the H&S is monitored through the checklists available in the estates and mills via the Work Site Inspection (WSI). The findings of the WSI is submitted on a quarterly basis to the Head Quarters and also discussed at the quarterly OSH Meetings in the estates and mill for the attention of the management and further improvements. The estate and mills also have checklist to monitor the usage of PPE. OSH Training Programme are in place to ensure regular trainings are conducted in line with the HIRARC requirement.	Complied				
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>							
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>A training programme has been developed and available in the Training and Safety Briefing Plan for Year 2021. The trainings were sighted to have included Gender Specific Training and involves staffs and workers.</p> <p>Covid-19 training and briefings were sighted at the mill and estates. Interview with the workers and staff indicated that they were aware on the SOP during the current pandemic such as social distancing, regular sanitization and use of PPE (Face Mask).</p>	Complied				
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Records of trainings were maintained by the Mill and all estates as below:</p> <p><u>Asia Palm Oil Mill</u></p> <table border="1" data-bbox="1144 1326 1926 1375"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Training	Date			Complied
Training	Date						

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		Weighbridge Reception Training	25/05/2021	
		Boiler Station Training	19/07/2021	
		Ramp Station Training	25/03/2021	
		Workshop Training	11/06/2021	
		Noise Conservation Program	12/07/2021	
		HCV & Open Burning Training	14/06/2021	
		Sexual Harassment Training	28/07/2021	
		Chemical Handling Training	09/08/2021	
		<u>Asia Oil Palm Estate 2</u>		
		Training	Date	
		Workshop Training	10/06/2021	
		Spraying Training	19/07/2021	
		Water Sampling Training	19/04/2021	
		Sexual Harassment Training	14/07/2021	
		Zero Burning Training	07/04/2021	
		HCV, Environment and Safety Training	07/04/2021	
		Scheduled Waste Training	09/08/2021	
		<u>Melewar Estate Div 2.</u>		
		Training	Date	

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<table border="1"> <tr><td>Tractor Driver Training</td><td>10/09/2021</td></tr> <tr><td>Harvesting Training</td><td>03/12/2021</td></tr> <tr><td>Safe Work at Ramp Training</td><td>16/11/2021</td></tr> <tr><td>Working at Height Training</td><td>08/11/2021</td></tr> <tr><td>IPM Training</td><td>07/09/2021</td></tr> <tr><td>Water Sampling Training</td><td>29/09/2021</td></tr> <tr><td>Buffalo Management Training</td><td>10/08/2021</td></tr> </table> <p><u>Hwa Li Estate Div 3</u></p> <table border="1"> <thead> <tr><th>Training</th><th>Date</th></tr> </thead> <tbody> <tr><td>Sprayer Training</td><td>15/03/2021</td></tr> <tr><td>Driver & Loader Training</td><td>18/03/2021</td></tr> <tr><td>Ramp Training</td><td>15/03/2021</td></tr> <tr><td>Workshop Training</td><td>06/03/2021</td></tr> <tr><td>Noise Exposure Training</td><td>18/03/2021</td></tr> <tr><td>Riparian Zone Training</td><td>24/02/2021</td></tr> <tr><td>Company Policy and Sustainability Training</td><td>25/11/2021</td></tr> </tbody> </table>	Tractor Driver Training	10/09/2021	Harvesting Training	03/12/2021	Safe Work at Ramp Training	16/11/2021	Working at Height Training	08/11/2021	IPM Training	07/09/2021	Water Sampling Training	29/09/2021	Buffalo Management Training	10/08/2021	Training	Date	Sprayer Training	15/03/2021	Driver & Loader Training	18/03/2021	Ramp Training	15/03/2021	Workshop Training	06/03/2021	Noise Exposure Training	18/03/2021	Riparian Zone Training	24/02/2021	Company Policy and Sustainability Training	25/11/2021	
Tractor Driver Training	10/09/2021																																
Harvesting Training	03/12/2021																																
Safe Work at Ramp Training	16/11/2021																																
Working at Height Training	08/11/2021																																
IPM Training	07/09/2021																																
Water Sampling Training	29/09/2021																																
Buffalo Management Training	10/08/2021																																
Training	Date																																
Sprayer Training	15/03/2021																																
Driver & Loader Training	18/03/2021																																
Ramp Training	15/03/2021																																
Workshop Training	06/03/2021																																
Noise Exposure Training	18/03/2021																																
Riparian Zone Training	24/02/2021																																
Company Policy and Sustainability Training	25/11/2021																																
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>Asia Oil Palm Mill has conducted Supply Chain Trainings for all critical points identified in the Supply Chain Process. The stations identified under the critical points were weighbridge, grading, extraction, clarification, nut & kernel plant, laboratory, despatch,</p>	Complied																														

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>waste management and transporter. The training records were available for verification. Sampled the training records as below.</p> <table border="1" data-bbox="1160 435 1937 735"> <thead> <tr> <th>SCCS Critical Control Point - Station</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Weighbridge Station</td> <td>25/05/2021</td> </tr> <tr> <td>Grading Station</td> <td>12/02/2021</td> </tr> <tr> <td>Laboratory Station</td> <td>12/04/2021</td> </tr> <tr> <td>Despatch Station</td> <td>13/07/2021</td> </tr> <tr> <td>Transporter</td> <td>09/07/2021</td> </tr> </tbody> </table>	SCCS Critical Control Point - Station	Date	Weighbridge Station	25/05/2021	Grading Station	12/02/2021	Laboratory Station	12/04/2021	Despatch Station	13/07/2021	Transporter	09/07/2021	
SCCS Critical Control Point - Station	Date														
Weighbridge Station	25/05/2021														
Grading Station	12/02/2021														
Laboratory Station	12/04/2021														
Despatch Station	13/07/2021														
Transporter	09/07/2021														
<p>Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C). However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>															
3.8.1	<p>Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Asia POM receives and process both certified and non-certified FFB. In Asia POM they using Mass balance supply chain system module. During this assessment the audit team verified the volume and sources of certified and non-certified FFB entering the mill, the implementation of processing control and volume sales of the RSPO product.</p>	Not Applicable												
3.8.2	<p>Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. 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</p>	<p>Asia POM receives and process both certified and non-certified FFB. In Asia POM they using Mass balance supply chain system module. During this assessment the audit team verified the volume and sources of certified and non-certified FFB entering the mill,</p>	Complied												

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	only the volume of oil palm products produced from processing of the certified FFB as MB.	the implementation of processing control and volume sales of the RSPO product.											
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification 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.	Asia POM receives certified FFB and uncertified FFB, therefore, qualifies for the Mass Balance Supply Chain System and module. During the RSPO assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.	Complied										
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	Asia POM already registered with the pal trace system and meet all registration and reporting requirement for MB supply chain through the RSPO IT platform.	Complied										
3.8.5	<p>Documented procedures</p> <p>The mill 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:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) 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 mill's procedures for the implementation of this standard. 	<p>Written procedures establish as Asia Palm Oil Mill Standard Operation Procedure for SCCS – Standard Operation Procedure for SCC Standard Mass Balance Calculator; Doc Ref; SC/MBC-05/2019-AOM; Doc. Date 15/4/2019. No changes from previous report.</p> <p>The data records all was up to date and reported accordingly and its showed the demonstrate the compliance with the supply chain model requirement as per sample training record on SCCS as per below:-</p> <table border="1" style="width: 100%;"> <thead> <tr> <th>SCCS Critical Control Point - Station</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Weighbridge Station</td> <td>25/05/2021</td> </tr> <tr> <td>Grading Station</td> <td>12/02/2021</td> </tr> <tr> <td>Laboratory Station</td> <td>12/04/2021</td> </tr> <tr> <td>Despatch Station</td> <td>13/07/2021</td> </tr> </tbody> </table>	SCCS Critical Control Point - Station	Date	Weighbridge Station	25/05/2021	Grading Station	12/02/2021	Laboratory Station	12/04/2021	Despatch Station	13/07/2021	Complied
SCCS Critical Control Point - Station	Date												
Weighbridge Station	25/05/2021												
Grading Station	12/02/2021												
Laboratory Station	12/04/2021												
Despatch Station	13/07/2021												

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<table border="1"> <tr> <td data-bbox="1153 360 1635 411">Transporter</td> <td data-bbox="1646 360 1926 411">09/07/2021</td> </tr> </table>	Transporter	09/07/2021	<p>The person in charge on SCCS was available at site and verified as per appointment letter dated 2/9/2019 for En Mohd Faisal. As for documented procedures for receiving and processing certified and non-certified FFBs was available under documented procedure of Mechanism for Handling Non-Conforming Oil Pal Product and Document Ref SC/MEC-06/2020-AOM dated 6/10/2020.</p>
Transporter	09/07/2021				
<p>3.8.6</p>	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>		<p>Complied</p>		
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>		<p>Complied</p>		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>also the ticket weighbridge were stamped and ticket its category of either sustainable or not. Sighted the sample as per below:- Certified FFB ticket: FFB21012185W; Date: 30/8/2021; Supplier: Melewar Estate 2; Net Weight: 14.33mt Certified FFB ticket: FFB21012149W; Date: 30/8/2021; Supplier: Hwa Li Div 3; Net Weight: 36.40mt Certified FFB ticket: FFB21012159W; Date: 30/8/2021; Supplier: Asia Oil Palm Estate; Net Weight: 4.66mt Non-certified ticket: FFB21011966W; 28/8/2021; Supplier: Meran Sdn Bhd; Net Weight: 14.58mt</p>	
<p>3.8.8</p>	<p>Sales and Goods Out The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The 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> <ol 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; RSPO certificate number; A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; 	<p>Asia POM ensured all minimum information for RSPO certified products is made available in set of documents of all products deliveries as per sample sighted as below:- The contract of palm kernel (AOP/2456/10/21) dated 24/9/2021 Quantity: 200mt. Address of Buyer: Lahad Datu Edible Oils Sdn Bhd (LDEO) Address of Seller: Asia Oil Palm Sdn Bhd Delivery date: 31/10/2021 Document date: 31/10/2021 RSPO Cert No: 651278 Product Code: Palm Kernel RSPO MB Quantity: 29.04 mt Seal no: 221221-28/221240 Ticket no: PKRS21000535W</p> <p>The contract of CPO (AOP/A0462/06/21) dated 25/5/2021</p>	<p>Complied</p>

	<p>i) A unique identification number.</p>	<p>Quantity:4500mt Address of Buyer: Lahad Datu Edible Oils Sdn Bhd (LDEO) Address of Seller: Asia Oil Palm Sdn Bhd Delivery date: 15/7/2021 Document date: 15/7/2021 RSPO Cert No: 651278 Product Code: Crude oil palm RSPO MB Quantity: 32.66 mt Seal no: 215814-215824 Ticket no: CPORS21000276W</p>	
<p>3.8.9</p>	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill 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 mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p>	<p>The outsource in Asia POM was involved only for transportation of products CSPO and CSPK. This implementation was based on the procedure; Doc Ref; SC/07-06/2019-AOM; Critical control point 7: CPO and PK despatch and Transportation dated 30/9/2019. Sighted the recent contract for both CSPO and CSPK were delivered hence requiring outsource process; transportation. Sighted as per below record:-</p> <p>CPO transportation agreement between Asia Oil Palm Sdn Bhd and Pengangkutan Dagang Tera Sdn Bhd; Dated 1/7/2017 and valid until 30/6/2023. The extension can refer to letter AOP/P6(AOM)/25/NKW dated 20/5/2020</p> <p>Palm Kernel Transportation Agreement between Asia Oil Palm Sdn Bhd and Pengangkutan Dagang Tera Sdn Bhd; 1/7/2017 and renew valid until 30/6/2023 (letter: AOP/P6(AOM)/26/NKW dated 20/5/2020)</p>	<p>Complied</p>

	<p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill 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 all information, when this is announced in advance.</p>		
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Names and contact details of transporters that physically handle certified oil palm products were recorded and available for verification in the Stakeholder List – Contractor which was last updated on 27/01/2021.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the 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 to be informed by mill supply chain PIC upon available.	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p>	<p>Asia POM have kept records such as Supply Chain Procedures, SCCS Internal Audits, SCCS Trainings, Mass Balance Records and Despatch Notes that were available for verification.</p> <p>The records are kept for 7 years as per own SOP, Standard Operation Procedure for SCC Standard Mass Balance Calculation; Record Keeping. Doc Ref No: SC/MBC-07/2021-AOM; Document Date: 13/08/2021. Verified records as below:</p> <p>d. Sales of CPO/RSPO MB; Contract LDO/01P1901/007IL; Weighbridge Ticket Number: 83050110192631 R; Date: 16/04/2019; Net Weight: 32, 610 kg.</p> <p>Asia Palm Oil Mill receives and processes both certified and non-certified FFB. Hence it uses the Mass Balance Module.</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<ul style="list-style-type: none"> a) 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. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock). 	<ul style="list-style-type: none"> a. The mill has recorded and balanced all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on three monthly basis. The records were available in the Quarterly Mass Balance 2021. b. Quarterly Mass balance 2021 was reviewed. All the certified CPO and PK products sold were deducted from the accounting system. Sales of Certified products as ISCC or downgraded as conventional products have been deducted from the accounting system. c. Quarterly Mass balance 2021 was reviewed. All sales of certified CPO and PK were from positive stocks. 													
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The OER and KER are measured daily and reported on a daily, weekly and summarized on a monthly and yearly basis through the mill production report. The OER and KER is derived on an actual CPO and PK production against the FFB received.</p> <table border="1" data-bbox="1151 887 1921 1085"> <thead> <tr> <th>Month</th> <th>OER %</th> <th>KER %</th> </tr> </thead> <tbody> <tr> <td>September</td> <td>20.81</td> <td>4.92</td> </tr> <tr> <td>October</td> <td>21.17</td> <td>5.12</td> </tr> <tr> <td>November</td> <td>20.70</td> <td>4.96</td> </tr> </tbody> </table>	Month	OER %	KER %	September	20.81	4.92	October	21.17	5.12	November	20.70	4.96	Complied
Month	OER %	KER %													
September	20.81	4.92													
October	21.17	5.12													
November	20.70	4.96													
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The facility is using the actual extraction rate and therefore updating of rates is not necessary.</p>	Complied												
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Not applicable as Asia Palm Oil Mill is opted for Mass Balance module.</p>	Not Applicable												

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>Shipping Announcement in the RSPO IT was carried out by the mills upon sale of RSPO certified products not more than three months after dispatch. Sampled the shipping announcement as below:</p> <p>e. Product Name: CSPO; Transaction ID: TR-7f708773-75b4, last delivery on 30/11/2021, created on 03/12/2021 and confirmed on 03/12/2021</p> <p>f. Product Name: CSPK; transaction ID: TR-74790930-ffd7; Last Delivery on 29/09/2021, Created on 06/10/2021 and confirmed on 14/10/2021.</p> <p>RSPO certified volumes sold under ISCC scheme and as conventional were removed in the RSPO IT platform.</p>	Complied
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>There had been no claim made using RSPO logo & trademark by the mill.</p>	Complied
General corporate communications			
4.1	<p>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.</p>	<p>Asia POM was not made any claims for its sustainable products. Hence this requirement is not applicable.</p>	Not Applicable
4.2	<p>In corporate communications a member is allowed to:</p> <p>a. Display its RSPO membership status</p> <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>Asia POM was not made any claims for its sustainable products. Hence this requirement is not applicable.</p>	Not Applicable

	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.		
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.	Asia POM was not made any claims for its sustainable products. Hence this requirement is not applicable.	Not Applicable
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.	Asia POM was not made any claims for its sustainable products. Hence this requirement is not applicable.	Not Applicable
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.	Asia POM was not made any claims for its sustainable products. Hence this requirement is not applicable.	Not Applicable
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.	Asia POM was not made any claims for its sustainable products. Hence this requirement is not applicable.	Not Applicable
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 supply chain model and certificate number under which the claim is being made.	Asia POM was not made any claims for its sustainable products. Hence this requirement is not applicable.	Not Applicable
5.3	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: 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	Asia POM was not made any claims for its sustainable products. Hence this requirement is not applicable.	Not Applicable

	<p>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>		
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 products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	Asia POM was not made any claims for its sustainable products. Hence this requirement is not applicable.	Not Applicable
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.	Asia POM was not made any claims for its sustainable products. Hence this requirement is not applicable.	Not Applicable
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.	Asia POM was not made any claims for its sustainable products. Hence this requirement is not applicable.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Asia POM was not made any claims for its sustainable products. Hence this requirement is not applicable.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Asia POM was not made any claims for its sustainable products. Hence this requirement is not applicable.	Not Applicable
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.	Asia POM was not made any claims for its sustainable products. Hence this requirement is not applicable.	Not Applicable
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.	Asia POM was not made any claims for its sustainable products. Hence this requirement is not applicable.	Not Applicable

6.8	<p>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 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.rsपो.org.</p>	<p>Asia POM was not made any claims for its sustainable products. Hence this requirement is not applicable.</p>	<p>Not Applicable</p>
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>The CSPO and CSPK produced in Asia palm Oil Mill is 100% RSPO MB Certified.</p>	<p>Complied</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 non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>The CSPO and CSPK produced in Asia palm Oil Mill is 100% RSPO MB Certified.</p>	<p>Complied</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'. 	<p>There had been no claim made using RSPO logo & trademark by the mill.</p>	<p>Complied</p>

	<ul style="list-style-type: none"> • 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. 		
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 produced by RSPO certified mills and plantations. <p>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>There had been no claim made using RSPO logo & trademark by the mill.</p>	<p>Not Applicable</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. 		
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>A Policy to respect human rights, including prohibition against retaliation towards HRDs is documented in JC Chang’s Social and Human Rights Policy dated 14 Nov 2019 signed by the Plantation Director. This Policy is communicated to workers during Policy trainings on 1 Feb 2021 (Asia 2 POM), 25 August 2021 (Melewar 2 Estate) and 10 March 2021 (Hwa Li 3 Estate).</p>	Complied
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>There is no evidence of any use of violence or the instigation of violence within Asia Palm Oil Mill and its supply base estates. This was further verified during interviews held with external stakeholders and security personnel.</p>	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>The certification unit has its own complaints and grievance procedure. The grievance/complaint procedure is a 4-step procedure with each step having its own number of days for responding. For example, the first step requires the supervisor or person-in-charge to meet the complainant within 7 working days of complaint, and to respond within 10 days of receipt of complaint/grievance. If the complainant is unsatisfied with step 1, the complaint/grievance to the Senior Assistant Manager in writing where a meeting must be held with the complainant within 5 working days of receipt of the written request. The Assistant</p>	Complied

		<p>Manager has to respond within 7 working days of receipt of grievance, so on and so forth.</p> <p>JC Chang’s Social and Human Rights Policy dated 14 November 2019 signed by the Plantation and Mill Director respectively, contains a provision on retaliation against human rights defenders.</p>	
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>The SOP on Mechanism for Complaints and Grievances Doc Ref No. E/001-07/2019 dated 12 Aug 2019 contains a provision that in briefings given to illiterate parties, the confirmation on understanding should be performed using their understood language after briefing, and management should ensure that the stakeholders truly the briefings given. Sighted during the audit were acknowledgements by workers after social policy briefing was given on 1 Feb 2021 at the Asia 2 POM.</p>	Complied
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>There were no complaints in the Complaints and Grievance books. The last recorded complaint was received on 23 Oct 2019. Complaints on housing defects are identified during weekly housing inspections and rectified as soon as possible.</p>	Complied
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>The SOP on Mechanism for Complaints and Grievances Doc Ref No. E/001-07/2019 dated 12 Aug 2019 contains a provision that parties have the option of referring the unresolved complaint/grievance to an independent arbitrator, and the option to access to technical and legal advice, and the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as a third-party mediator.</p>	Complied
<p>Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p>	<p>Among the contributions to community development include the following:</p> <ul style="list-style-type: none"> - Providing job opportunities to suitable local communities 	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<p>- Minor compliance -</p>	<ul style="list-style-type: none"> - Providing infrastructure facilities and maintenance for the CLC school for migrant workers' children and accommodation for the teachers - Providing transport for workers' children going to SK Sandau dan SK Paris - Providing education aid to staff and workers' children RM300 (secondary) RM200 (primary) to purchase school needs. - Construct and upkeep roads leading to smallholders' farms - Contribution of bottled water and rice for SPM students of SMK Paris, Kinabatangan who were stranded because of Covid movement restrictions. 													
<p>Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>															
<p>4.4.1</p>	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>The latest land statement for Hwa Li Div 3 estate was 4388.71 ha and previously was 4277.60 ha. The management already acquired land from Smart Foremost Sdn Bhd around 111.11 ha. Verification on Land title transfer from Smart Foremost Sdn Bhd to Asia Ecogreen Sdn Bhd dated 23/10/2019. The detail land title as per below:-</p> <table border="1" data-bbox="1137 976 1926 1289"> <thead> <tr> <th>Company Name</th> <th>Lot No.</th> <th>Hectarage</th> <th>Land Term used</th> </tr> </thead> <tbody> <tr> <td>Asia Ecogreen Sdn Bhd</td> <td>P.T 91090903</td> <td>101.1 (valid until 31/12/2093)</td> <td>For agriculture</td> </tr> <tr> <td>Asia Ecogreen Sdn Bhd</td> <td>P.T 95090394</td> <td>10.01 (Valid until 31/12/2094)</td> <td>For agriculture</td> </tr> </tbody> </table>	Company Name	Lot No.	Hectarage	Land Term used	Asia Ecogreen Sdn Bhd	P.T 91090903	101.1 (valid until 31/12/2093)	For agriculture	Asia Ecogreen Sdn Bhd	P.T 95090394	10.01 (Valid until 31/12/2094)	For agriculture	<p>Complied</p>
Company Name	Lot No.	Hectarage	Land Term used												
Asia Ecogreen Sdn Bhd	P.T 91090903	101.1 (valid until 31/12/2093)	For agriculture												
Asia Ecogreen Sdn Bhd	P.T 95090394	10.01 (Valid until 31/12/2094)	For agriculture												

		<p>The following are the details of the land ownership or lease, based on sampled documents:</p> <p>a. Melewar Oil Palm Estate Division 2 Lease document: CL 095311201. Lessee: Melewar Properties Sdn Bhd Area: 2,023.4 ha Lease period: 1 Jan 1979 to 31 December 2077.</p> <p>b. Hwa Li Estate Division 3 Lease document: CL 095324502. Lessee: Syarikat Keratong Sdn Bhd Area: 4,047 ha Lease period: 1 Jan 1994 to 31 December 2092.</p> <p>c. Asia Oil Palm Estate Division 2 & Palm Oil Mill Lease document: CL 095317383. Lessee: Asia Oil Palm Sdn Bhd Area: 3,024 ha Lease period: 1 Jan 1990 to 31 December 2088.</p> <p>d. Hwa Li Estate 3 also had acquired 111.11 ha piece of land on 23 October 2019. Details are as follows:</p> <p>i. CL 095324600 dated 16 January 1995 between Directors of Lands and Survey and Abdul Agas, Maimuna Emik, Jinah Jappar, Jarinah Buangkan, Daud Agas ("original lessees"). Lease period: 1 January 1995 to 31 December 2093.</p>	
--	--	---	--

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>Land use purpose: For cultivation of agricultural crop of economic value. PT 91090903 registered on 20 Dec 1995. Area: 101.1 ha On 13 Nov 1998, the original lessees transferred to Kumarasamy a/l Suppiah. On 25 August 2006, Kumarasamy a/l Suppiah transferred to Smart Foremost Sdn Bhd. Via memo MC1910090018 dated 25 October 2019, Smart Foremost Sdn Bhd transferred to Asia Ecogreen Sdn Bhd.</p> <p>ii. CL 095326104 registered on 11 November 1997 between Directors of Lands and Survey and Jailah bt Agas ("original lessee"). Lease period: 1 January 1996 to 31 December 2094. Land use purpose: For cultivation of agricultural crop of economic value. PT 95090394 registered on 11 November 1997. Area: 10.1 ha On 9 April 1995, original lessee transferred to Kumarasamy a/l Suppiah. On 25 August 2006, Kumarasamy a/l Suppiah transferred to Smart Foremost Sdn Bhd. Via memo MC1910090013 dated 23 October 2019, Smart Foremost Sdn Bhd transferred the land to Asia Ecogreen Sdn Bhd.</p>	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	There is no evidence of any use local community land that requires negotiations or agreements detailing FPIC processes. Details of the	Complied

		land historical ownership are as per Indicator 4.4.1 above. Therefore, this indicator is not applicable.	
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	There is no evidence of any local community land that requires discussions or with affected community groups. Details of the land historical ownership are as per Indicator 4.4.1 above. Therefore, this indicator is not applicable.	Complied
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	There is no evidence of any local community land that requires discussions or involve consents of affected community groups. Details of the land historical ownership are as per Indicator 4.4.1 above. Therefore, this indicator is not applicable.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of 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 unit of certification's title, concession or lease on the land. - Minor compliance -	There is no evidence of any local community land that requires local communities' acceptance. Details of the land historical ownership are as per Indicator 4.4.1 above. Therefore, this indicator is not applicable.	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	There is no evidence of any local community land that requires maps of appropriate scale showing extent of recognized legal, customary or user rights affected local communities. Therefore, this indicator is not applicable.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	All available relevant documents are as per details in Indicator 4.4.1 above. There is no land conflict involved and no proposed benefit sharing nor legal arrangements. Therefore, this indicator is not applicable.	Complied

4.4.5	<p>(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	There is no evidence of any local community land involved and so this indicator is not applicable.	Complied
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	There is no evidence of any local community land involved and so this indicator is not applicable.	Complied
<p>Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	Evidence of rightful and legal land ownership are as per Indicator 4.4.1 above. No other legal, customary or user rights is available.	Complied
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	There is no new planting within Asia 2 certification unit and therefore, this Indicator is not applicable.	Not Applicable
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p>	There is no new planting within Asia 2 certification unit and therefore, this Indicator is not applicable.	Not Applicable

	- Minor compliance -		
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -	There is no new planting within Asia 2 certification unit and therefore, this Indicator is not applicable.	Not Applicable
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	There is no new planting within Asia 2 certification unit and therefore, this Indicator is not applicable.	Not Applicable
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	There is no new planting within Asia 2 certification unit and therefore, this Indicator is not applicable.	Not Applicable
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	There is no new planting within Asia 2 certification unit and therefore, this Indicator is not applicable.	Not Applicable
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	There is no new planting within Asia 2 certification unit and therefore, this Indicator is not applicable.	Not Applicable
Criterion 4.6: 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.			

4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>The SOP is available for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation (Ref No. E/002-03/2015) dated 8 September 2015. FPIC Procedure is available in Doc Ref No: E/004-07/2015 dated 9 September 2015 as well as Resolution and Compensation Procedure Ref. E/002-02/2012 dated 11 September 2012.</p>	Complied
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>The SOP is available for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation (Ref No. E/002-03/2015) dated 8 September 2015. FPIC Procedure is available in Doc Ref No: E/004-07/2015 dated 9 September 2015 as well as Resolution and Compensation Procedure Ref. E/002-02/2012 dated 11 September 2012.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	<p>Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute. Therefore, this Indicator is not applicable.</p>	Complied
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	<p>Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute. Therefore, this Indicator is not applicable.</p>	Complied
<p>Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>The SOP is available for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation (Ref No. E/002-03/2015) dated 8 September 2015. FPIC Procedure is available in Doc Ref No: E/004-07/2015 dated 9 September 2015 as well as Resolution and Compensation Procedure Ref. E/002-02/2012 dated 11 September 2012.</p>	Complied

4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>The SOP is available for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation (Ref No. E/002-03/2015) dated 8 September 2015. FPIC Procedure is available in Doc Ref No: E/004-07/2015 dated 9 September 2015 as well as Resolution and Compensation Procedure Ref. E/002-02/2012 dated 11 September 2012.</p> <p>There is no evaluation done as there is no evidence of any local people having legal, customary or user rights.</p>	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute. Therefore, this Indicator is not applicable.</p>	Complied
<p>Criterion 4.8: 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>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	<p>Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute. Therefore, this Indicator is not applicable.</p>	Complied
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p>	<p>Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute. Therefore, this Indicator is not applicable.</p>	Complied

	- Critical (Major) compliance -																														
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	Based on documentation review and interviews conducted with local communities, there is no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations. Therefore, this Indicator is not applicable.	Complied																												
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	Based on documentation review and interviews conducted with local communities, there is no evidence of any land dispute. Therefore, this Indicator is not applicable.	Complied																												
Principle 5: Support smallholder inclusion																															
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.																															
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Asia POM displayed the current and previous period prices paid for FFB in front the weighbridge counter on a white board. Sighted the records of current and previous FFB prices for December 2021 displayed as following. <table border="1" data-bbox="1137 1023 1928 1366"> <thead> <tr> <th>Date</th> <th>1% OER</th> <th>% OER</th> <th>Price</th> </tr> </thead> <tbody> <tr> <td>01/12/2021</td> <td>53.52</td> <td>20</td> <td>RM 1070.40</td> </tr> <tr> <td>02/12/2021</td> <td>53.11</td> <td>20</td> <td>RM 1062.20</td> </tr> <tr> <td>03/12/2021</td> <td>52.88</td> <td>20</td> <td>RM 1057.60</td> </tr> <tr> <td>04/12/2021</td> <td colspan="3">No Trade</td> </tr> <tr> <td>05/12/2021</td> <td colspan="3">Public Holiday</td> </tr> <tr> <td>06/12/2021</td> <td>53.13</td> <td>20</td> <td>RM 1066.60</td> </tr> </tbody> </table>	Date	1% OER	% OER	Price	01/12/2021	53.52	20	RM 1070.40	02/12/2021	53.11	20	RM 1062.20	03/12/2021	52.88	20	RM 1057.60	04/12/2021	No Trade			05/12/2021	Public Holiday			06/12/2021	53.13	20	RM 1066.60	Complied
Date	1% OER	% OER	Price																												
01/12/2021	53.52	20	RM 1070.40																												
02/12/2021	53.11	20	RM 1062.20																												
03/12/2021	52.88	20	RM 1057.60																												
04/12/2021	No Trade																														
05/12/2021	Public Holiday																														
06/12/2021	53.13	20	RM 1066.60																												

		07/12/2021	53.73	20	Rm 1074.60	
5.1.2	<p>(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).</p> <p>- Critical (Major) compliance -</p>	<p>Asia Palm Oil Mill have explained the FFB pricing to its FFB suppliers via the Fresh Fruit Bunches Sales and Purchase Agreement. Sighted the FFB Sales and Purchase Agreement for Benar Warisan Sdn Bhd (Agreement Date: 11/02/2021), Sentrabayu Industries Sdn Bhd (Agreement Date: 11/02/2021) and Kebaco Sdn Bhd (Agreement Date: 11/02/2021). Sustainability Meeting and FFB Sales and Purchase Agreement was conducted on 21/01/2019 together with the FFB suppliers to explain the FFB pricing among others.</p>				Complied
5.1.3	<p>(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>Asia Palm Oil Mill provides the FFB price for all external FFB Suppliers based on the MPOB – Daily FFB Reference Price Summary by Region (Mill Gate) (RM1% OER).</p>				Complied
5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>There are no smallholders supplying FFB to Asia Palm Oil Mill. All FFB suppliers are estates and outgrowers. Sales and Purchase agreements were available and mutually agreed between both parties which states the quantity, quality, weights, FFB price calculations, payments, warranty and duration among others. The agreements have been undersigned by both parties and available for verification.</p>				Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Fresh Fruit Bunches Sales and Purchase Agreement 2021 were available for all external FFB suppliers. Sighted the FFB Sales and Purchase Agreement for Benar Warisan Sdn Bhd (Agreement Date: 11/02/2021), Sentrabayu Industries Sdn Bhd (Agreement Date: 11/02/2021) and Kebaco Sdn Bhd (Agreement Date: 11/02/2021). The agreement details out that <i>'Full payment shall be made by buyer to seller for the whole month's deliveries not later than 10 working days after the official announcement of the MPOB Crude Palm Oil and kernel prices.'</i></p>				Complied

5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>The Fresh Fruit Bunches Sales and Purchase Agreement 2021 details out that <i>'Full payment shall be made by buyer to seller for the whole month's deliveries not later than 10 working days after the official announcement of the MPOB Crude Palm Oil and kernel prices.'</i> Records shown that all FFB payments to FFB suppliers were made in a timely manner within the agreed period.</p>	Complied
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>Asia POM have annually calibrated the weighbridge as per mandatory requirements of Weight and Measures Act 1972. The weighbridge calibration certificates were available for verification as below.</p> <ol style="list-style-type: none"> <u>Weighbridge I</u> Weighbridge Serial Number: 191950202; Safety Stamping Number: 2.1K – Q022395; Model: 60, 000 kg Avery STW ATK 007242; Calibration Date: 01/02/2021. <u>Weighbridge II</u> Weighbridge Serial Number: 180250282; Safety Stamping Number: 2.1K – Q030304; Model: 60, 000 kg Avery JM 305 STW ATK 018441; Calibration Date: 25/11/2021. 	Complied
5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.</p> <p>- Minor compliance -</p>	<p>There are no Independent Smallholders within the certification unit. Therefore, this indicator is not applicable.</p>	Not Applicable
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>Asia POM have established its own Complaint Grievance Procedure based on the company's documented SOP on Mechanisms for Communication and Consultation, Doc Ref. No: E/004-08/2019; Date: 12/08/2019. Grievance from internal and external stakeholder were available in the</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		Sustainability/Complain/Suggestion/Grievance Monitoring Book. There was no grievance recorded since the last audit from external FFB suppliers.	
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	There are no smallholders that supply FFB to Asia Palm Oil Mill therefore this indicator is not applicable.	Not Applicable
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	There are no smallholders that supply FFB to Asia Palm Oil Mill therefore this indicator is not applicable.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	There are no smallholders that supply FFB to Asia Palm Oil Mill therefore this indicator is not applicable.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	There are no smallholders that supply FFB to Asia Palm Oil Mill therefore this indicator is not applicable.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	There are no smallholders that supply FFB to Asia Palm Oil Mill therefore this indicator is not applicable.	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			

6.1.1	<p>(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>A Policy entitled Equal Opportunities Policy dated 12 August 2019 signed by the Plantation Director is available. This Policy prevents all forms of discrimination and is publicly available and displayed at the main notice boards. Interviews with various levels of employees and workers confirmed that no discrimination is practiced and that equal opportunities are provided to all employees.</p>	Complied
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>Based on interviews with workers at Melewar 2, Hwa Li 3 and Asia Oil Palm Estates and Asia 2 Mill, documents sighted and observations made, there is no evidence that there has been any form of discrimination against any local or foreign employees. Review of pay checks and employment contracts also confirm that all workers irrespective of nationalities, gender, religion, etc are accorded the same employment terms and receive the same wages for the same scope of work.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>Asia Palm Oil Mill and its supply base estates were able to demonstrate that the recruitment selection, hiring and access to training were based on skills, capabilities and medical fitness. Each worker filled up a job application form attaching copies of NRIC, qualification and previous work experience and medical fitness. The Manager then assessed their respective suitability to the job vacancies. Sighted during the audit were recruitment records of the following workers:</p> <ul style="list-style-type: none"> - Asia Palm Oil Mill: 1 fireman, 1 weighbridge operator, 1 lab assistant, 1 sweeper, 1 tractor driver. - Asia Oil Palm Estate 2: 1 general worker, 1 crane driver, 2 harvesters, 1 loosefruit picker. - Melewar 2 Estate: 2 tractor drivers, 1 harvester, 1 loosefruit picker, 2 manurers. 	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		- Hwa Li 3 Estate: 1 loosefruit mandore, 1 manuring mandore, 1 harvester, 2 manurers.	
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	There was no evidence that pregnancy tests are being conducted as a discriminatory measure. As confirmed by records and interviews conducted with estate health assistants, pregnancy tests were done monthly on female workers who handle chemicals such as sprayers and manurers. This is to avoid harmful chemical exposure to their foetus. Once a worker is confirmed pregnant, she would be reassigned to another job which is not chemical-related.	Complied
6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance -	Each operating unit has its own gender committee. Minutes of meetings reviewed and interviews were conducted with the gender committee chairpersons, gender committee members, and female workers. Based on the above, evidence was available that awareness were given on issues of concern for the female workers. Activities carried out included awareness briefings on sexual harassment held for 30 gender committee members on 25 Aug 2021. Tests were also given to gauge their levels of understanding. Other topics covered included equal opportunities for women, reproductive rights, domestic violence, complaints procedures and confidentiality of complaints. Among the meeting minutes reviewed was at Asia Estate 2 Estate dated 23 Aug 2021 where discussions were held on sexual harassment, domestic violence, health issues related to Covid-19, child abuse, reproductive rights, needs of new mothers, availability of nursing place, transport needed for medical check-ups, counselling needs on child rearing/nursing, etc.	Complied
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	All operating units were able to demonstrate evidence of equal pay for the same work scope. This was verified through reviews of sampled payslips and employment contracts of workers doing	Complied

		<p>similar work which showed that they received equal pay for equal work. Among the sampled workers were as follows:</p> <p>a. Hwa Li 3 Estate: Worker No. 300242 (female, Filipino, manurer), Worker No. 00278 (female, Indonesian, manurer).</p> <p>b. Asia Palm Oil Mill: Worker No. 3 (male, Malaysian, lab sampling) and Worker No. 18 (female, Indonesian, lab sampling).</p> <p>c. Asia Oil Palm Estate 2: Worker No. 45 (Filipino, male, weeder) and Worker No. 39 (female, Indonesian, weeder).</p> <p>d. Melewar Estate 2: Worker No. 5 (male, Indonesian, tractor driver) and Worker No. 9 (male, Indonesian, tractor driver).</p>	
<p>Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
<p>6.2.1</p>	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Applicable labour laws and documentation of pay and conditions are available to the workers in the form of employment contracts. These documents were prepared in Bahasa Malaysia, i.e., the language workers understand. Briefings were also given to the workers on the contents of the employment contract, prior to signing. A copy is given to each worker for record and safe keeping. The sampled employment contracts were signed, renewed accordingly and are still valid.</p> <p>The documentation of pay is in the form of monthly pay slips which are also written in Bahasa. Interviews conducted with the workers confirmed their understanding of the terms of the employment contract and their monthly pay slips. Number of samples taken are determined based on the formula of $\sqrt{n} \times 0.8$ (n= total number of workers)</p> <p>Employment contracts and payslips of the following workers were sighted during the audit:</p>	<p>Non-compliance</p>

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		Estate/ Mill	Workers No.	Date of employment contract	Payslips	
		Melewar 2	1483	Renewed on 10 Jan 21	April, May, July 2021	
			1537	Renewed on 30 Mac 21	April, May, July 2021	
			1551	Renewed on 10 Jan 21	April, May, July 2021	
			1271	Renewed on 10 April 16	April, May, July 2021	
			1256	Renewed on 7 Feb 16	April, May, July 2021	
			1652	3 Nov 21	April, May, July 2021	
			1627	Renewed 16 June 21	April, May, July 2021	
			1354	Renewed on 29 Mac 20	April, May, July 2021	
			1566	29 Jan 18	April, May, July 2021	
			1498	26 Aug 21	April, May, July 2021	
		Hwa Li 3	301588	1 Sept 20	June, July, Sept 21	
			301256	Renewed on 1 Nov 19	June, July, Sept 21	
			300600	Renewed on 10 Mac 19	June, July, Sept 21	
			00170	Renewed on 29 Mac 19	June, July, Sept 21	
			00278	Renewed on 15 Sept 17	June, July, Sept 21	
			00171	Renewed on 15 Sept 17	June, July, Sept 21	
			300241	1 March 21	June, July, Sept 21	
			00700	Renewed on 10 Mac 2019	June, July, Sept 21	
			300116	1 Sept 20	June, July, Sept 21	
			301705	1 Oct 20	June, July, Sept 21	
			300513	12 Feb 20	June, July, Sept 21	
		301290	Renewed on 20 Apr 20	June, July, Sept 21		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		301180	1 Sept 20	June, July, Sept 21
		01333	Renewed on 15 Sept 17	June, July, Sept 21
		00505	Renewed on 15 Sept 19	June, July, Sept 21
		301422	1 Sept 20	June, July, Sept 21
	Asia 2	AT00243	Renewed on 1 July 18	June, July, Oct 21
		AE200542	1 Mac 20	June, July, Oct 21
		AE200773	1 Feb 21	June, July, Oct 21
		AE200679	1 Mac 20	June, July, Oct 21
		C200588	Renewed on 1 July 18	June, July, Oct 21
		ATO0015	Renewed on 1 June 19	June, July, Oct 21
		ATO0813	Renewed on 1 July 18	June, July, Oct 21
		ATO0579	Renewed on 1 Apr 2019	June, July, Oct 21
		AE200414	Renewed on 15 Dec 19	June, July, Oct 21
		AJ200768	1 June 20	June, July, Oct 21
	Asia POM	G335	Renewed on 6 Aug 21	June, July, Oct 21
		G328	Renewed on 15 ug 20	June, July, Oct 21
		G134	11 Sept 2015	June, July, Oct 21
		G291	12 Feb 17	June, July, Oct 21
		G112	Renewed on 17 Aug 18	June, July, Oct 21
		G363	15 Aug 21	June, July, Oct 21
		G349	21 Sept 18	June, July, Oct 21
		G359	Renewed on 15 July 21	June, July, Oct 21
		G011	Renewed on 2 May 19	June, July, Oct 21
		G323	Renewed on 15 Aug 20	June, July, Oct 21

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		G167	Renewed on 5 June 19	June, July, Oct 21	
		<p>However, Asia Oil Palm Sdn Bhd (Asia 2 Estate) had not adequately explained clause 11 of the employment contract dated 1 June 2020 to Worker No. AE200768 that medical costs would be fully borne by the Estate. This had resulted in a deduction of RM85 from the worker's salary in May 2021 for the medical treatment for sinus bradycardia he received at Klinik Mabello (Paris), Kota Kinabatangan on 29 March 2021.</p> <p>Therefore, a Major Non-Compliance was raised.</p>			
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>The employment contracts signed with the workers detail out terms of employment and payment. These include regular working hours, statutory deductions, duration of employment, wages payable, working hours, medical benefits including medical leave entitlement, annual leave entitlement, mutual termination of service, etc. All the contracts sampled were still current.</p> <p>The payroll document (payslips) give accurate information on compensation for all work performed. It contains the following information: employee name, IC/passport, month of pay, pay description, (basic, price bonus, productivity incentive, allowances, deductions for SOCSO, EIS, KSWP, total income for the month, total deductions, net pay. None of the workers have family members working to help them with their work.</p> <p>The list of sampled workers' payslips and employment contracts are as per those indicated under Indicator 6.2.1 above.</p>			Complied
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p>	<p>There is evidence that workers observe regular working hours including overtime hours within the legal confines of the Sabah Labour Ordinance. Workers with medical certificates are given a paid medical leave, entitled to annual leave. Female employees are</p>			Complied

	<p>- Critical (Major) compliance -</p>	<p>entitled to 2 months’ paid maternity leave. This was verified from the workers’ employment contracts, payslips, punch cards and interviews with the workers themselves.</p> <p>There is no evidence of termination, and so compliance with reasons for dismissal and period of notice could not be verified during this audit.</p> <p>Salary deductions are made for statutory deductions such as SOCSO, EPF, and EIS.</p> <p>Non-statutory deductions are made for the following:</p> <ul style="list-style-type: none"> - New passports and passport for dependents - Medical costs for dependants - Purchase of buffalos - Surau or church contributions - Sports and recreation membership - Buffalo safety charge <p>Such non-statutory deductions were made upon receipt of written permits from the Labour Office as follows:</p> <ul style="list-style-type: none"> - Melewar 2 Estate: Permit dated 30 Sept 2020 valid form 30 Sept 2020 to 29 Sept 2022. No Siri: 600-1/2/13/138 (11/KBN/2020-0328) - Hwa Li 3 Estate: Permit dated 14 July 2020 valid form 14 July 2020 to 12 July 2022. No Siri: 600-1/2/13/136(11/KBN/2020-0191). - Asia 2 POM: Permit dated 12 June 2020 – 11 June 2022 No. Siri 600-1/2/13/13/(11/KBN/2020-0161). - Asia Oil Palm Estate 2: Permit dated 14 July 2020 valid from 14 July 2020 to 13 July 2022 No siri: 600-1/2/13(11/KBN/2020-0190). 	
--	--	--	--

<p>6.2.4</p>	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>All operating units provide adequate housing to all its workers for free. All houses have its own sanitation facilities, electricity and water supplies. Treated water is supplied to all other estates from its own source and own generated electricity. Water and electricity are provided free of charge. Other welfare amenities available at the workers’ housing include CLC schools, playing fields, futsal court, creche, grocery shops and places of worship (surau and chapels). Domestic water quality sampling was also carried out. Sampled was the water quality sampling at Melewar 2 Estate carried out 31 March 2021 Lab Ref W210309/01 total coliform and E.coli were absent.</p> <p>Medical facilities are provided at all estates and managed by Estate Health Assistants (EHA). Treatment available are for cough and cold, minor cuts and injuries. Records of monthly visits by the visiting medical officer (VMO) from Klinik Mabello, Kg Paris were also sighted. Even if the Employees’ Minimum Standard of Accommodation and Amenities Act 1990 is not applicable to Sabah, as an opportunity for improvement, guidance provided by the Employees’ Minimum Standard of Accommodation and Amenities Act 1990 should be followed with regards to:</p> <ul style="list-style-type: none"> - Fortnightly visits by the VMO (as opposed to the current fortnightly visits) as this would enable the VMO to attend to patients more frequently at the estate/mill clinics; - Provision of milk at the creche as this would provide appropriate nutrition to children below 1 year, and from 1 - 6 years. <p>This is also in tandem with the RSPO MYNI (Revised April 2021) Annex 2 Guidance for Indicator 6.2.4. which states that “for Sabah & Sarawak, in the absence of any State enactment/ ordinance, the</p>	<p>Complied</p>
--------------	--	---	-----------------

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>Unit of certification should be guided by the provision under the Workers' Minimum Housing & Amenities Act".</p> <p>Also sighted during the audit were weekly linesite inspection reports carried out by the respective health assistants as follows:</p> <ul style="list-style-type: none"> - 3 Dec, 8 Nov, 7 Oct 2021 (Melewar 2 Estate) - 3 Nov, 12 Nov, 26 Nov, 4 Dec 2021 (Asia 2 POM). - Asia Estate 1 Nov, 8 Nov, 15 Nov 2021 <p>The linesite inspections monitor cleanliness, lights, toilet, drainage, rubbish collection, signs of open burning, water tank conditions, scheduled waste etc.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>All operating units were able to demonstrate that efforts have been made to improve workers' access to adequate, sufficient and affordable food by allowing food canteen sundry shops to operate near the workers' housing. Workers are also allowed an area to plant vegetables to supplement their diet.</p> <p>Also sighted during the audit were price list of items sold at Melewar 2 Estate grocery shop Mahee Trading dated 5 Dec 2021. Also sighted was price inspection report dated 15 Nov 2021 where prices of controlled items were recorded. Kedai Runcit Chin Kui Min also sent its price lists for October and November 2021 to the management of Asia 2 Estate and Asia 2 POM for monitoring purposes. Also reviewed during the audit was the meeting minutes between the estate management with Kedai Chin Kui Min on 8 July 2021 where price of items sold was discussed.</p>	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p>	<p>For the certification units, calculation of DLW took into account housing, medical, transportation and education. The amount is calculated as RM1,519.93 which consists of:</p>	Complied

<p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits 	<p>Actual wages: RM1280.85 plus actual benefits-in-kind of RM239.08.</p>	
---	--	--

	<ul style="list-style-type: none"> • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>All the estates and mill employ full-time employees, and based on records reviewed and interviews conducted, there are no casual, temporary and day labour employed within all the certification units.</p>	Complied
<p>Criterion 6.3: The unit of Certification 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.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The statement recognising freedom of association and the right to collective bargaining is available in JC Chang’s Social and Human Rights Policy dated 14 November 2019. This Policy is available on the website and displayed at main notice boards throughout the certification unit. The Policy is also explained to workers as follows:</p> <p>Asia 2 Estate: 26 July 2021 and 14 October 2021 Asia 2 POM: 1 February 2021 Hwa Li 3 Estate: 10 March 2021 Melewar 2 Estate: 25 August 2021.</p> <p>This Policy has been demonstrably implemented based on records and observations as detailed out under Indicator 6.3.2 below.</p>	Complied

<p>6.3.2</p>	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Workers are allowed to appoint their own representatives and form a Joint Consultative Committee (JCC). JCC meetings comprise workers and management representatives. Minutes of meetings were prepared in Bahasa Malaysia. Sighted were minutes of the following JCC meetings:</p> <p>At Melewar 2 Estate – meetings dated 18 August 2021 and 4 October 2021 which was attended by management and worker representatives, Mahee Trading (estate sundry shop), as well as CLC representatives. Among the issues discussed were matters related to workers’ safety and welfare such as electricity supply, repair of leaking water tank, price monitoring at Mahee Trading and supply of sufficient food item Covid-19 during lockdown, minimum wage, etc. Copies of the meeting minutes were distributed to the committee members including the workers as evidenced by acknowledgement dated 11 Oct 2021.</p> <p>At the Asia 2 POM – minutes of JCC meetings dated 21 May 2021, 13 Aug 2021, 12 Nov 2021 discussed issues related to housing amenities, overtime, price monitoring of goods sold at the estate sundry shop, and workers facing increased expenditure during covid.</p> <p>At Asia Oil Palm Estate 2: minutes of JCC meetings dated 10 March 2021, 9 June 2021 and 10 Sept 2021 discussed issues related to sale of adequate food at the shop, CLC, water usage at the workers’ linesite, Covid-19 infections, etc.</p>	<p>Complied</p>
<p>6.3.3</p>	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Workers are free to elect their own representatives to sit in the JCC. Evidence was available to show that the workers’ representatives have been freely chosen by the workers themselves via an election process and they represent their respective nationalities.</p>	<p>Complied</p>

		<p>At Melewar 2 Estate, records showed that election to choose representatives was held on 10 May 2017 and there has been no change in representatives since.</p> <p>At Asia 2 POM, documents were available to show that election was held on 10 September 2020.</p> <p>At Asia 2 Estate, records showed that the election was held on 14 April 2021.</p> <p>Interviews held with workers also confirmed that the elections were held free from any management interference.</p>	
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>The Policy for the protection of children, including the prohibition against child labour is available in Child Protection Policy dated 20 February 2020 approved by Plantation Director. Evidence was available that Sustainability Compliance documents were signed with contractors on meeting applicable legal requirements and disallowing child, forced and trafficked labour. Sighted during the audit was contract signed between JC Chang Group and Agensi Pekerjaan Hollywood dated 17 July 2020.</p>	Complied
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>Based on interviews, documentation review and observations in the field, evidence is available that minimum age requirements of 18 years old are met throughout the certification unit.</p> <p>Personnel files contain copies of the workers' NRIC (for Malaysians) and passports (for non-Malaysians). These documents were used to screen age of the workers when they applied for the job. Visit to the linesite and field also did not reveal any persons under 18 years old working.</p>	Complied

6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance -</p>	<p>There was no evidence that any young persons were employed at the certification unit as evidenced from documentation review, field observations and interviews.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -</p>	<p>The Child Protection Policy dated 20 February 2020 which was approved by Plantation Director is being displayed at main notice boards. Briefings were also conducted as follows: Asia 2 Estate: 26 July 2021 and 14 October 2021 Asia 2 POM: 1 February 2021 Hwa Li 3 Estate: 10 March 2021 Melewar 2 Estate: 25 August 2021.</p>	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -</p>	<p>A Policy to prevent sexual and other forms of harassment is contained in Sexual Harassment Policy dated 1 Jul 2012 signed by the Plantation Director. This Policy is displayed at the main notice boards and briefings were given as follows: Asia 2 Estate: 26 July 2021 and 14 October 2021 Asia 2 POM: 1 February 2021 Hwa Li 3 Estate: 10 March 2021 Melewar 2 Estate: 25 August 2021.</p>	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -</p>	<p>A Policy to protect reproductive rights of all, especially of women JC Chang's Social and Human Rights Policy dated 14 Nov 2019 signed by the Plantation Director. This Policy is displayed at the main notice boards and briefings were given as follows: Asia 2 Estate: 26 July 2021 and 14 October 2021 Asia 2 POM: 1 February 2021 Hwa Li 3 Estate: 10 March 2021</p>	Complied

		<p>Melewar 2 Estate: 25 August 2021.</p> <p>Interviews with workers and gender committee members confirm that the reproductive rights policy is being implemented where they are not prevented from planning their family and mothers given 2 months paid maternity leave.</p>	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>Management is aware of the requirement to assess the needs of new mothers. Two employees at Asia 2 POM gave birth approximately 2 weeks prior to the audit and during the audit, were still on maternity leave in their respective hometowns and therefore were not able yet for assessment.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>The SOP on Mechanism for Complaints and Grievances is available in Doc Ref No. E/001-07/2019 dated 12 Aug 2019. It respects anonymity and protects complainants when requested. This SOP is displayed at the main notice boards and briefings were given as follows:</p> <p>Asia 2 Estate: 26 July 2021 and 14 October 2021 Asia 2 POM: 1 February 2021 Hwa Li 3 Estate: 10 March 2021 Melewar 2 Estate: 25 August 2021.</p> <p>There was no record of any complaint since the last audit. However, interviews with workers confirmed their understanding.</p>	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. 	<p>Based on interviews with the workers, and observations made, the following were found:</p> <p>a. Retention of documents: All workers are free to keep their own passports. There is no retention of identity documents or passports unless these are needed for passport/work permit renewal. Those who wish to keep their passports at the office have signed a letter</p>	Complied

	<ul style="list-style-type: none"> • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>to that effect. Sighted during the audit were letters from Hwa Li 3 Estate (Workers No. 00700, 301290, 300660, 00278, 00171, 300241, 301588).</p> <p>b. Charging of recruitment fee: Workers are not charged any recruitment fees. Workers employed by the certification unit are directly hired with no recruitment agents as intermediaries.</p> <p>c. Involuntary overtime: Based on interviews conducted with the workers, all overtime work were carried out on a voluntary basis. Workers are free decline any offers for overtime work.</p> <p>d. Lack of freedom to resign: Workers are free to resign as per stated in their employment contracts.</p> <p>e. Debt bondage: There is no evidence of any incidence of debt bondage.</p> <p>f. Withholding of wages: There is no evidence of withholding of wages.</p> <p>g. Contract substitution: There was no evidence of contract substitution. All workers were directly hired and knew what type of job they would be doing prior to signing their contracts.</p>	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The certification unit employ migrant workers from Philippines and Indonesia. Established was the Guidelines on Terms and Conditions of Employment for Sabah Estate Workers (Doc E/009-06/2018) dated 16 Nov 2018. This document covers legalization of foreign workers, no contract substitution, no discrimination, payment of minimum wages, provision of post-arrival orientation on language, safety, laws, regulations.</p>	Complied
<p>Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			

<p>6.7.1</p>	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>All operating units have formed an OSH Committee in the respective mill and estate to address all issues associated to Health and Safety in the operating units.</p> <p>a. <u>Asia Palm Oil Mill</u> The Mill Manager, Mr. Chan Chor Laup has been appointed as the Chairman of the OSH committee in the mill as stated in the appointment letter dated 02/01/2021 undersigned by the Mill Director.</p> <p>b. <u>Asia Oil Palm Estate 2</u> The Estate Manager, Mr. Kiu Hieng Seng has been appointed as the Chairman of the OSH Committee in the state as stated in the appointment letter dated 01/07/2021 undersigned by te Plantation Director.</p> <p>c. <u>Melewar Estate Div. 2</u> The Estate Manager, Mr. Dulmi Hj. Mullar has been appointed as the OSH Chairman in the estate as stated in the appointment letter dated 25/07/2018 undersigned by the Plantation Director.</p> <p>d. <u>Hwa Li Estate Div. 3</u> The Estate Manager Mr. Paul Chong Boon Piu has been appointed as the OSH Chairman in the estate as stated in the appointment letter dated 08/08/2018 undersigned by the General Manager.</p> <p>OSH Committee of the respective operating units conducts regular OSH Meetings to address all issues related to OSH in the operating units.</p>	<p>Complied</p>
--------------	--	--	-----------------

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<ul style="list-style-type: none"> a. Asia Palm Oil Mill have conducted regular OSH Meetings in the mill. The meeting minutes were available for verification dated 12/11/2021, 13/08/2021 and 21/05/2021. b. Asia Oil Palm Estate conducted regular OSH Meetings in the estate. The meeting minutes were available for verification dated 19/03/2021 (01-2021), 21/06/2021 (02-2021) and 18/09/2021 (03-2021). c. Melewar Estate Div. 2 have conducted regular OSH meetings in the estate. The meeting minutes were available for verification dated 04/10/2021 (03-2021), 19/08/2021 (02-2021) and 04/04/2021 (01-2021). d. Hwa Li Estate Div. 3 have conducted quarterly OSH meetings in the estate. The meeting minutes were available for verification dated 20/09/2021 (JKK-78), 19/07/2021 (JKK-77) and 15/03/2021 (JKK-76). 	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Emergency Response Plans and Procedures were available in the estates and mills to address potential emergencies such as Flood, Fire, Chemical Spillage, Poisoning, Earthquake/landslide, Accidents, Storm and Wild/ Poisonous Animal Attacks. The plans have been posted at notice boards in the mills and estates and communicated to the workers. Emergency contact numbers have been posted at the notice boards and provided to the workers as well. Interview with the workers such as mandores and store attendants indicated that the workers are aware on the available emergency response plans. Trainings were conducted in the mill and estates to provide awareness to the workers on emergency responses. The trainings were sighted as below.</p> <ol style="list-style-type: none"> 1. <u>Asia Palm Oil Mill</u> <ul style="list-style-type: none"> - ERP & Fire Drill conducted on 23/03/2021 	Complied

		<ul style="list-style-type: none"> - ERP – Flood Training conducted on 27/08/2021 <ol style="list-style-type: none"> 2. <u>Asia Oil Palm Estate</u> <ul style="list-style-type: none"> - Fire Extinguisher Training and Fire Drill on 23/02/2021 3. <u>Melewar Estate Div. 2</u> <ul style="list-style-type: none"> - Emergency Response Training – 25/09/2021 - Fire Drill Briefing – 28/04/2021 4. <u>Hwa Li Estate Div 3.</u> <ul style="list-style-type: none"> - Fire Fighting Training – 15/09/2021 <p>First aiders were present in the operating units. They have been trained and obtained certificates as the PIC to address first aid in the operating units. Visit to the mill and estates indicated each station and gangs were equipped with first aid kits. Interview with the respective first aid holders indicated that they were well aware on the methods to use the items in the first aid boxes. The boxes are regularly monitored by the mill and estate Hospital Assistants to replenish the used items and replace expired items. Records of items used were also maintained and available in the boxes.</p> <ol style="list-style-type: none"> 1. <u>Asia Palm Oil Mill</u> <ul style="list-style-type: none"> - The First Aid Training was conducted on 17/09/2021. - There were 6 First Aiders present in the mill that have completed the knowledge and skill evaluations for basic Occupational First Aid, CPR & AED Training on 30 & 31 January 2019 conducted by Certified Emergency Response Training Academy. 2. <u>Asia Oil Palm Estate</u> <ul style="list-style-type: none"> - First Aid and Eye Wash Training was conducted on 20/03/2021 and 21/10/2021. 	
--	--	--	--

		<p>3. <u>Melewar Estate Div. 2</u></p> <ul style="list-style-type: none"> - The first aid box in the estate was last checked by the HA on 03/12/2021 to replenish used items and replace expired items. - First Aiders were present in the estate that have completed the knowledge and skill evaluations for basic Occupational First Aid, CPR & AED Training on 30 & 31 January 2019 conducted by Certified Emergency Response Training Academy. - First Aid Kit Training have been conducted for all holders on 24/02/2021 and 05/03/2021. <p>4. <u>Hwa Li Estate Div. 3</u></p> <ul style="list-style-type: none"> - First Aid Training was conducted for all workers on 30/11/2021. - First Aiders were present in the estate that have completed the knowledge and skill evaluations for basic Occupational First Aid, CPR & AED Training on 30 & 31 January 2019 conducted by Certified Emergency Response Training Academy. <p>Accident records were maintained in the estate and available for verification.</p> <p>1. <u>Asia Palm Oil Mill</u></p> <p>For the year 2020 there were 1 accident case reported at the mill. The accident investigation report was available for verification. The JKKP 8 Form for the year ending 2020 have been submitted to DOSH on 29/01/2021 and available for verification. As for the year 2021 there were no accidents reported in the estate as of to date.</p>	
--	--	--	--

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>2. <u>Asia Oil Palm Estate</u> For the year 2020 there were 1 minor accident reported for the year. The JKKP 8 form have been submitted to DOSH and available for verification. For the year 2021 there were 1 minor accident as well not involving any loss of mandays.</p> <p>3. <u>Melewar Estate Div. 2</u> For the year 2020 there were 2 accidents reported in the estate due to harvesting operations. The necessary accident investigations were conducted, and JKKP 6 forms have been submitted to DOSH accordingly. The JKKP 8 form for the year ending 2020 have been submitted to DOSH via MyKKP on 08/01/2021 (Reference Number: JKKP 8/55971/2020) and was available for verification. As for the year 2021, as of November 2021 there were 2 minor (first aid) accidents reported in the estate involving harvesting works.</p> <p>4. <u>Hwa Li Estate Div. 3</u> For the year 2020, there were 3 accident cases reported for the year in the estate. 1 of the case involved lost of 14 mandays. The JKKP 6 form have been submitted to DOSH and available for verification. The JKKP 6 for the year ending 2020 has been submitted to DOSH on 12/01/2021. There were accident cases reported for the year 2021 in the estate.</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang and Manuring Gang and visit to the stores of the respective estates and mill, it was sighted that all required appropriate PPEs were worn by the personals.</p> <p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>showers were all in good working condition. Interview with workers indicated that they were all well aware that they have to sanitise themselves before returning home due to the hazard that the chemical residues could cause.</p>																																
<p>6.7.4</p>	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>All workers are provided with medical care which is borne by the operating units management. Each operating unit has its own dispensary managed by a certified Hospital Assistant. There are no restrictions for workers to obtain medical aid from the dispensary. In case of major injuries or health issues, workers are referred to private clinics or hospitals which is totally borne by the management as well.</p> <p>All workers are protected via insurance in accordance with Malaysian Law via SOCSO contribution. The monthly contribution was evident via the PERKESO Monthly Salary Contribution (Form 8A) for the workers as following.</p> <table border="1" data-bbox="1137 879 1926 1361"> <thead> <tr> <th>Operating Units</th> <th>Month</th> <th>Total Workers</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Asian Palm Oil Mill</td> <td>Aug 2021</td> <td>127</td> <td>RM 4,301.90</td> </tr> <tr> <td>Sept 2021</td> <td>128</td> <td>RM 4,224.30</td> </tr> <tr> <td>Oct 2021</td> <td>124</td> <td>RM 4,158.30</td> </tr> <tr> <td rowspan="3">Melewar Estate Div. 2</td> <td>Aug 2021</td> <td>143</td> <td>RM 2,801.40</td> </tr> <tr> <td>Sept 2021</td> <td>144</td> <td>RM 2,915.40</td> </tr> <tr> <td>Oct 2021</td> <td>141</td> <td>RM 2,711.60</td> </tr> <tr> <td rowspan="2">Hwa Li Estate Div. 3</td> <td>Aug 2021</td> <td>310</td> <td>RM 5,950.40</td> </tr> <tr> <td>Sept 2021</td> <td>310</td> <td>RM 6,323.80</td> </tr> </tbody> </table>	Operating Units	Month	Total Workers	Amount	Asian Palm Oil Mill	Aug 2021	127	RM 4,301.90	Sept 2021	128	RM 4,224.30	Oct 2021	124	RM 4,158.30	Melewar Estate Div. 2	Aug 2021	143	RM 2,801.40	Sept 2021	144	RM 2,915.40	Oct 2021	141	RM 2,711.60	Hwa Li Estate Div. 3	Aug 2021	310	RM 5,950.40	Sept 2021	310	RM 6,323.80	<p>Complied</p>
Operating Units	Month	Total Workers	Amount																															
Asian Palm Oil Mill	Aug 2021	127	RM 4,301.90																															
	Sept 2021	128	RM 4,224.30																															
	Oct 2021	124	RM 4,158.30																															
Melewar Estate Div. 2	Aug 2021	143	RM 2,801.40																															
	Sept 2021	144	RM 2,915.40																															
	Oct 2021	141	RM 2,711.60																															
Hwa Li Estate Div. 3	Aug 2021	310	RM 5,950.40																															
	Sept 2021	310	RM 6,323.80																															

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

			Oct 2021	303	RM 6,156.00																															
		Asia Oil Palm Estate Div. 2	Aug 2021	213	RM 3,929.30																															
			Sept 2021	201	Rm 4,084.60																															
			Oct 2021	197	RM 4,261.60																															
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -		All accidents incidents are reviewed during the quarterly held safety meetings in the operating units. Records on Lost Time Accident (LTA) are maintained and presented during the meetings. Accident records were updated and available for verification. JKPP 8 have been submitted to DOSH accordingly and available for verification. The LTA for each operating unit has been recorded (year to date November 2021) and available as below.	<table border="1"> <thead> <tr> <th rowspan="2">Operating Units</th> <th colspan="2">2020</th> <th colspan="2">2021</th> </tr> <tr> <th>Cases</th> <th>Days</th> <th>Cases</th> <th>Days</th> </tr> </thead> <tbody> <tr> <td>Asia Palm Oil Mill</td> <td>1</td> <td>3</td> <td>0</td> <td>0</td> </tr> <tr> <td>Melewar Div 2</td> <td>2</td> <td>7</td> <td>2</td> <td>0</td> </tr> <tr> <td>Asia Oil Palm Div 2</td> <td>1</td> <td>0</td> <td>1</td> <td>0</td> </tr> <tr> <td>Hwa Li Est Div 3</td> <td>3</td> <td>14</td> <td>0</td> <td>0</td> </tr> </tbody> </table>				Operating Units	2020		2021		Cases	Days	Cases	Days	Asia Palm Oil Mill	1	3	0	0	Melewar Div 2	2	7	2	0	Asia Oil Palm Div 2	1	0	1	0	Hwa Li Est Div 3	3	14	0	0
Operating Units	2020		2021																																	
	Cases	Days	Cases	Days																																
Asia Palm Oil Mill	1	3	0	0																																
Melewar Div 2	2	7	2	0																																
Asia Oil Palm Div 2	1	0	1	0																																
Hwa Li Est Div 3	3	14	0	0																																
Principle 7: Protect, conserve and enhance ecosystems and the environment																																				
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.																																				
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	The estate visited has established IPM List and Treatment management plan dated 30/6/2021 and also Guidelines on Integrated and Disease Management of Oil Palm (L/001-07/2019) dated 13/8/2019. The plan is reviewed on annually basis. The plan covers on possible pest outbreaks such as;-					Complied																													

		<ul style="list-style-type: none"> • Rat attack • Leaf eating caterpillar • Leaf eating insect • Ganoderma • And Rhinoceros Beetle <p>The plan covers on census, planting of beneficial plant and chemical treatment. Reviewed the implementation of the beneficial plant planted such as Tunera subulate and Antigonan leptopus. Another verification on rat census dated 1/7/2021 showed that the damage was 13.45% in PM95B01. For Ganoderma census in Field PM95D5 dated 21/6/202, record showed 15.97%. The action taken to soil mounding been carried out yearly basis where the result above 20% for Ganoderma infection cases.</p>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>Plan to prevent and monitor the spread of species reference in the Global Invasive Species Database and CABI.org. This is not practiced in the sampling estate. None of species were referenced in the Global Invasive Species Database are used in the management of IPM.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>No evidence and record showed using fire for pest control in all estate. Asia production unit has committed to Zero Burning compliance as spelt out in the JC Chang Group Environmental Policy dated 1/1/2008.</p>	Complied
<p>Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>Estate have maintained and revised if required, the documented standard operating procedures file that contain in the safe operating procedure and to implement the various major field operations. For example, among others the following operations: -</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<ul style="list-style-type: none"> Justification for Pesticide Usage under IPM (Insecticide, Fungicide and Rodenticide) (B/008-14/2016) Justifications for pesticide usage under IPM (B/009-10/2015) 														
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>The record of pesticide usage was available including active ingredient used and area treated, amount of active ingredient applied per Ha and number of applicants. The record as per below:-</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Type of chemical</th> <th>a.I per Ha</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Melewar Div 2 Estate</td> <td>Triclopyr 2 butoxy ethyl ester</td> <td>0.182</td> </tr> <tr> <td>antracol</td> <td>0.019</td> </tr> <tr> <td rowspan="2">Hwa Li Div 3</td> <td>Glyphosate</td> <td>0.005</td> </tr> <tr> <td>Metsulfuron methyl</td> <td>0.001</td> </tr> </tbody> </table>	Estate	Type of chemical	a.I per Ha	Melewar Div 2 Estate	Triclopyr 2 butoxy ethyl ester	0.182	antracol	0.019	Hwa Li Div 3	Glyphosate	0.005	Metsulfuron methyl	0.001	Complied
Estate	Type of chemical	a.I per Ha														
Melewar Div 2 Estate	Triclopyr 2 butoxy ethyl ester	0.182														
	antracol	0.019														
Hwa Li Div 3	Glyphosate	0.005														
	Metsulfuron methyl	0.001														
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The management also establish the procedure to ensure minimised on pesticide usage such as ;-</p> <p>The quantity of agrochemicals required for various field conditions are documented and justified under Guidelines on Integrated Pest and Disease Management of Oil Palm (Doc Ref. No L/001-07/2019 dated 13/8/2019)</p>	Complied													
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>No evidence of prophylactic use of pesticides in the estates visited as per Register of Chemicals Hazardous to Health for all estates visited.</p>	Complied													
7.2.5	<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, unless in exceptional circumstances, as validated</p>	<p>There are no Class 1A and Class1B at the Asia Production Unit's estates during this assessment. The used of Paraquat was totally banned and replaced with systemic chemical.</p>	Complied													

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<p>by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<table border="1"> <thead> <tr> <th>Estate</th> <th>Register date (Since)</th> </tr> </thead> <tbody> <tr> <td>Hwa Li Div.3 estate</td> <td>10/8/19 (only chemical class III and IV used)</td> </tr> <tr> <td>Asia Oil Palm Estate Div.2</td> <td>1/3/19 (only class III and IV used)</td> </tr> <tr> <td>Melewar Div 3 estate</td> <td>1/11/19 (only chemical class III and IV used)</td> </tr> </tbody> </table>	Estate	Register date (Since)	Hwa Li Div.3 estate	10/8/19 (only chemical class III and IV used)	Asia Oil Palm Estate Div.2	1/3/19 (only class III and IV used)	Melewar Div 3 estate	1/11/19 (only chemical class III and IV used)	
Estate	Register date (Since)										
Hwa Li Div.3 estate	10/8/19 (only chemical class III and IV used)										
Asia Oil Palm Estate Div.2	1/3/19 (only class III and IV used)										
Melewar Div 3 estate	1/11/19 (only chemical class III and IV used)										
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were handled, used or applied by trained workers applied in accordance with the product label. Latest training for pesticides handler was conducted on 19/07/2021. Appropriate safety and application equipment were provided and used, i.e 3M 3200/3200F, anti-fog goggles, apron and wellington boots based on CHRA assessor’s recommendation.</p> <p>All precautions attached to the products (SDS, notice board etc) were properly observed, applied, and understood by workers based on the interview with staff and workers at visited estates.</p>	Complied								
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation. Based on CHRA assessor’s store assessment recommendation, the below action was taken for improvement as such;</p> <ul style="list-style-type: none"> i) Ventilation system for adequate air flow 	Complied								

		<p>ii) No workstation placed in the chemical storage</p> <p>iii) DOSH approved PPE is recommended.</p>	
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Empty pesticides containers in Hwa Li estate were triple rinsed, its bottom perforated to render it useless, inventoried and stored. This empty chemical container was been store at estate and disposed as Recycle waste and certain dispose as scheduled waste. Sampling as per below;-</p> <p>Melewar Div 2 Estate</p> <p>Recycle waste for empty chemical container, disposed at Newgates Industries (Borneo) Sdn Bhd refer ME2/H110/2020/2021/13/DM/nm dated 4/12/2021 with total 500 empty container.</p> <p>Hwa Li Div 3 Estate</p> <p>SW 409(Disposal container contaminated with SW) consignment note 2021093016COEBD4 dated 30/9/2021 with total 0.54 mt at Legenda Bumimas Sdn Bhd.</p>	Complied
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>No aerial spray was carried out at Asia Production Unit.</p>	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Medical Surveillance were conducted in the estates based on the recommendation of the CHRA for workers exposed to hazardous chemicals. Results of annual medical surveillance were available in the estates for verification as follows.</p> <p>- <u>Asia Oil Palm Estate Div2</u></p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>The medical surveillance programme for the year 2021 has been performed on 14/03/2021 at Mabello Group of Clinics for 43 workers identified to be exposed to hazardous chemicals in the estate. The results indicated that all workers were fit to work.</p> <ul style="list-style-type: none"> - <u>Melewar Estate Div 2</u> <p>The medical surveillance programme for the year 2021 has been performed on 05/08/2021 for 33 employees at Klinik Mabello (Paris) Sdn Bhd. The results indicated all workers were certified fit to work with no occupational related medical conditions.</p> <ul style="list-style-type: none"> - <u>Hwa Li Estate Div 3</u> <p>The medical surveillance programme for the year 2021 has been performed on 12/08/2021 for 55 employees at Klinik Mabello (Paris) Sdn Bhd. The results indicated all workers were certified fit to work with no occupational related medical conditions.</p>	
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>There are women works with pesticides at all visited estates. For those who were still within reproductive age, urine pregnancy test (UPT) was conducted by EHA to confirm and check the pregnancy status for those who exposed to chemical i.e store keeper, chemical mixer and sprayer etc. All result showed negative and as per master list of workers and interview with the management no record of workers under the 18 in all sampling estate.</p>	Complied
<p>Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>Melewar Div 2 Estate Recycle waste for empty chemical container, disposed at Newgates Industries (Borneo) Sdn Bhd refer</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>ME2/H110/2020/2021/13/DM/nm dated 4/12/2021 with total 500 empty container.</p> <p>Schedules waste in Melewar Div 2 estate</p> <p>Type SW: SW 306,305, 410, 110, 409, 418, 417. Inventory ASSH/TWU(B)95/130/100/273 dated November 2021</p> <p>Last disposal was on 21/9/2021 to Lagenda Bumimas Sdn Bhd reviewed as per below document:-</p> <p>SW 409 (lubricant container):- consignment note 20210921165YI2B4 with total 0.002 mt.</p> <p>SW 305(Mineral oil):- Consignment note 20210921162XALQM with total 1.4 mt</p> <p>SW 410(Oil filter):- Consignment note 2021092116AQURYE with total 0.15 mt</p> <p>Hwa Li Div 3 Estate</p> <p>Inventory of SW: ASSH/SDK(B)95/130/100/279 dated Nov 2021</p> <p>Type of SW: SW 102,109, 305, 409, 410</p> <p>Last disposal record available as per below:-</p> <p>SW 109 (waste containing mercury) consignment note 2021093016ACBDM1 dated 27/9/2021 with total 0.013mt</p> <p>SW 409(Disposal container contaminated with SW) consignment note 2021093016COEBD4 dated 30/9/2021 with total 0.54 mt</p> <p>Asia POM</p> <p>Inventory of SW: ASSH/SDK(B)31/152/000/054 dated Nov 2021</p> <p>Type of SW: SW 102, 110, 305, 306, 409, 410, 429.</p> <p>Last disposal record available as per below verification:</p>	
--	--	---	--

		SW 429 (Discard chemical) consignment note 21/9/2021 with total 0.0018 mt. SW 409 (Gelen Plastic) consignment note 21/9/2021 with total 0.1350 mt. Disposed at Legenda Bumimas Sdn Bhd.	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	Training on Scheduled waste on 12/7/2021 conducted by Mr. Tony Tiwon. Sampling in Asia, disposal for recycle waste to Newgates Industries dated 4/12/2021 referred weighbridge ticket PTC21000015W with total 0.30 mt and PTC21000014W with total 0.43 mt.	Complied
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	During site verification no evidence of fire been using for waste disposal I housing area and field. Domestic waste were disposed twice a week at the designated landfill. All workers are aware regarding to no open burning policy.	Complied
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	JC Chang Group has established SOPs of good agricultural practices to manage soil fertility to optimise yield and minimise environmental impacts documented in Guideline on Soil and Water Conservation, refer document no. C/002-01/2008 dated on 10/11/2018 and Fertiliser recommendation, refer document no. B/015-01/2013 dated on 19/7/2013. This guideline has outlines the method to ensure palm oil produce optimal and sustained yield. The agronomist latest recommendation was on 9/10/2021. The implementation was verified as per document fertiliser usage record July 2020 – June 2021.	Complied
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	JC Chang Group has established Guideline on Guideline for Foliar Sampling, Doc. Ref. No. C/026-01/2017 dated on 31st May 2017. The objective of this guideline is to determine the nutritional status of leaflets of frond no. 9 on immature palms and frond no. 17 on	Complied

		mature palms to assist with the preparation of annual fertilizer program Leaf and soil nutrient analysis are commonly used in the diagnosis of fertilizer requirements in oil palms. The frequency for soil analysis and leaf sampling is conducted annually. The foliar sampling and soil analysis reports by the company's agronomist were available at the estates. The latest agronomist recommendation for fertiliser was on 21/11/2021 by Mr Yong Kian Keong (Senior Agronomist).	
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance -	JC Chang Group has established Guideline Semi-Decomposed EFB Application, Doc. Ref. No. B/023-01/2016 dated on 28th October 2016 and Guideline for Compost Application, Doc. Ref. No. B/022-01/2016 dated on 28th October 2016. EFB application is in practice as part of nutrient recycling strategy as per company guideline. All EFB were sourced from compost plant of Asia POM, where the EFB had been mixed with POME to produce compost. The record of EFB and Compost application were available for verification as per below:- EFB application Melewar Div 2 Estate PM95D01 – 7-15/10/2021 with total 123 mt Asia Oil Palm Estate Div. 2 PR20A – 1 -30/9/2021 with total 526.37mt	Complied
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	Fertilizers were applied as per agronomist recommendation. The records have the information about application date, filed number, dosage applied per palm, type of fertilizer and number of applicators. Types of fertilizer applied were of straight and mixture. Sampling as per below;- Melewar Div 2 Estate	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>Review on Impact Special OP 1 and compound fertiliser (Ekot) Field PR19B6 Programme: December 2020 Date: 24/12/2020 Bag: 20 bag (1000kg) Type: Impact Special OP 1</p> <p>Nursery Programme: May 2021 Date: 3 & 4/5/2021 Bag: 8 bag Type: Ekot</p> <p>Asia Oil Palm Estate Div. 2 Programme: June 2021 Date: 25-30/6/2021 Bag: 538 bag Type: Bayovar RP</p>	
Criterion 7.5: Practices minimise and control erosion and degradation of soils.			
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -</p>	<p>Soil maps for each estates were available for verification, which source from British Government’s Overseas Development Administration (Land Resources Division) United Kingdom, 1974, for the Sabah Governments. The maps of Soil in Hwa li was available for reviewed, referred report Hwa Li 3 estate by Param Agriculture Soil Survey (M) Sdn Bhd dated revise 2004. No fragile soil in Hwa Li estate and major soil series in estate was</p>	Complied

		Kinabatangan series, Sapi series, Lungmanis series, Rumidi Series and Kretam Sories.	
7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance -	JC Chang Group has established Guideline Managing Steep Areas Planted with Oil Palms, Doc. Ref. No. C/005-01/2008 dated on 26th December 2008. In order to minimize erosion from planting activities in slopes, the estates practice were to construct terraces and establishment of cover crop such as Mucuna sp. This was sighted during the field visit at all the sampled estates.	Complied
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	As per site visit verification in field PM 98B no extensive replanting of oil palm on steep terrain. The highest hill only less than 15 degree around 40% of total estate. For Melewar estate Div 2 in Field PR 00, verified no extensive replanting of Oil Palm.	Complied
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	The maps of Soil in Hwa li was available for reviewed, referred report Hwa Li 3 estate by Param Agriculture Soil Survey (M) Sdn Bhd dated revise 2004. No fragile soil in Hwa Li estate and major soil series in estate was Kinabatangan series, Sapi series, Lungmanis series, Rumidi Series and Kretam Sories. In Melewar 2 estate was available for reviewed, referred report R19/3/48 by KDC Laboratory dated 27/2/2019. No fragile soil in Melewar estate	Complied
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	Based on soil maps for each estates were available for verification, which source from British Government's Overseas Development Administration (Land Resources Division) United Kingdom, 1974, for the Sabah Governments no fragile soil in sampling estate. The sample was same and no changes from the previous report.	Complied

<p>7.6.3</p>	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -</p>	<p>The soil survey and topographic information was available in estate verification on the data as per below:- Hwa Li Div 3 Estate</p> <table border="1"> <thead> <tr> <th>Area</th> <th>Ha</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Flat area</td> <td>1204.14</td> <td>28.15</td> </tr> <tr> <td>Very low hill</td> <td>209.61</td> <td>4.90</td> </tr> <tr> <td>Low hill</td> <td>1487.32</td> <td>34.77</td> </tr> <tr> <td>Moderate hill</td> <td>1376.53</td> <td>32.18</td> </tr> </tbody> </table> <p>Asia Oil Palm Estate Div. 2</p> <table border="1"> <thead> <tr> <th>Area</th> <th>Ha</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Flat area</td> <td>866.07</td> <td>28.64</td> </tr> <tr> <td>Low hill</td> <td>1246.19</td> <td>41.21</td> </tr> <tr> <td>Moderate hill</td> <td>911.74</td> <td>30.15</td> </tr> </tbody> </table> <p>Melewar estate Div 2</p> <table border="1"> <thead> <tr> <th>Area</th> <th>Ha</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Very low Hill (0-15)</td> <td>922.67</td> <td>45.6</td> </tr> <tr> <td>Low Hills and Minor valley</td> <td>80.94</td> <td>4</td> </tr> </tbody> </table>	Area	Ha	%	Flat area	1204.14	28.15	Very low hill	209.61	4.90	Low hill	1487.32	34.77	Moderate hill	1376.53	32.18	Area	Ha	%	Flat area	866.07	28.64	Low hill	1246.19	41.21	Moderate hill	911.74	30.15	Area	Ha	%	Very low Hill (0-15)	922.67	45.6	Low Hills and Minor valley	80.94	4	<p>Complied</p>
Area	Ha	%																																					
Flat area	1204.14	28.15																																					
Very low hill	209.61	4.90																																					
Low hill	1487.32	34.77																																					
Moderate hill	1376.53	32.18																																					
Area	Ha	%																																					
Flat area	866.07	28.64																																					
Low hill	1246.19	41.21																																					
Moderate hill	911.74	30.15																																					
Area	Ha	%																																					
Very low Hill (0-15)	922.67	45.6																																					
Low Hills and Minor valley	80.94	4																																					

		Moderate Hills (0-20)	823.52	40.7	
		Mountain and Hill	135.57	6.7	
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.					
7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	<p>There are no peat soil in sampling estate. In Hwa Li estate, there are Sapi soil series (Alluvium type) at field 00A4. The management already verified that organic matter was less than 60% organic matter. This analysis been conducted by KDC Laboratory from KL-Kepong (Sabah) Sdn Bhd, the result showed 15.66% to 21.46% referred report R21/4/319 dated 4/5/2021 thus no peat soil in Hwa Li estate as per mention in RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat</p>			Complied
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE:</p> <p>Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	<p>No peat soil in sampling estate as per verification thus not applicable for this management unit.</p>			Complied
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	<p>No peat soil in sampling estate as per verification thus not applicable for this management unit.</p>			Complied
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	<p>No peat soil in sampling estate as per verification thus not applicable for this management unit.</p>			Complied
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting.</p>	<p>No peat soil in sampling estate as per verification thus not applicable for this management unit.</p>			Not Applicable

	<p>The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>		
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	No peat soil in sampling estate as per verification thus not applicable for this management unit.	Not Applicable
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	No peat soil in sampling estate as per verification thus not applicable for this management unit.	Not Applicable
<p>Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.</p>			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p>	JC Chang Group has established Guideline on Water Management Plan - Sabah, Doc. Ref. No. C/004-01/2008 dated on 12th November 2008. The objective of this guideline is to aim for better	Complied

	<p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>water conservation, utilization and control of water pollution in the estate. SOP of Water Management Plan – Sabah covers;</p> <ol style="list-style-type: none"> 1. Riparian Buffer Zone 2. Demarcation of Wetland Area 3. Soil and Water Conservation Measures 4. No Construction of Bunds / Weirs / Dams Across Main Rivers 5. Monitoring of Water in Main River 6. Monitoring of Water for Household Consumption <p>Latest Water Management Plan is incorporated with Environmental and Social Improvement Plan – Sabah. The plan and implementation record are kept in the respective estates for reference. Sampling on implementation as per below:-</p> <p>Clean water analysis conducted for Domestic usage in Hwa Li Div 2 estate. DYNAKEY Laboratories Sdn Bhd (Lab ref; W210924/02 dated 27/8/2021 available and result showed as per below:-</p> <table border="1" data-bbox="1137 919 1664 1070"> <thead> <tr> <th>Item</th> <th>Result</th> </tr> </thead> <tbody> <tr> <td>Total coliform</td> <td>ND</td> </tr> <tr> <td><i>Escherichia coli</i></td> <td>ND</td> </tr> </tbody> </table> <p>In Asia POM, the water domestic used been analysis by 6monthly basis. The latest assessment was on 26/8/2021 (report no: W200612/03) and previously was conducted on 19/3/2021 (report no:W210319/018). The result showed that water was save for usage as per below:-</p> <table border="1" data-bbox="1137 1289 1664 1383"> <thead> <tr> <th>Item</th> <th>Result</th> </tr> </thead> <tbody> <tr> <td>Total coliform</td> <td>ND</td> </tr> </tbody> </table>	Item	Result	Total coliform	ND	<i>Escherichia coli</i>	ND	Item	Result	Total coliform	ND	
Item	Result												
Total coliform	ND												
<i>Escherichia coli</i>	ND												
Item	Result												
Total coliform	ND												

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<i>Escherichia coli</i>	ND																						
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>JC Chang Group has established Guideline on Water Management Plan - Sabah, Doc. Ref. No. C/004-01/2008 dated on 12th November 2008. The objective of this guideline is to aim for better water conservation, utilization and control of water pollution in the estate.</p> <p><u>Melewar Div 2 Estate</u></p> <p>Water analysis (report no: R21/7/262 from KDC Laboratory) dated 28/7/2021 for River (Sg. Loyong Pisut) showed as per below result:-</p> <table border="1" data-bbox="1137 703 1928 1246"> <thead> <tr> <th>Sample reference</th> <th>Point A</th> <th>Point B</th> <th>Point C</th> </tr> </thead> <tbody> <tr> <td>Chemical Oxygen Demand (COD) mg/l</td> <td>43</td> <td>46</td> <td>46</td> </tr> <tr> <td>Biological Oxygen Demand (BOD) mg/l</td> <td>2</td> <td>2</td> <td>3</td> </tr> <tr> <td>Ammoniacal Nitrogen mg/l</td> <td>ND</td> <td>ND</td> <td>ND</td> </tr> <tr> <td>Water Quality Index</td> <td>88</td> <td>84</td> <td>86</td> </tr> </tbody> </table> <p><u>Hwa Li Div 3 Estate</u></p> <p>The management already established the Guidelines on establishment of Riparian Buffer Zone (C001-03/2019) dated 27/4/2019. From the guidelines riparian zone, the management</p>			Sample reference	Point A	Point B	Point C	Chemical Oxygen Demand (COD) mg/l	43	46	46	Biological Oxygen Demand (BOD) mg/l	2	2	3	Ammoniacal Nitrogen mg/l	ND	ND	ND	Water Quality Index	88	84	86	Complied
Sample reference	Point A	Point B	Point C																						
Chemical Oxygen Demand (COD) mg/l	43	46	46																						
Biological Oxygen Demand (BOD) mg/l	2	2	3																						
Ammoniacal Nitrogen mg/l	ND	ND	ND																						
Water Quality Index	88	84	86																						

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

plan must be established and review yearly basis. Verification on management plan dated 1/9/2021 available in estate, verification on implementation of Annual Inspection conducted by management dated 26/9/2021.

Water analysis for river also been conducted by the management, referred standard operating procedure Guidelines on water management plan-Sabah (C/011-01/2010) dated 4/2/2010. Latest analysis conducted R21/9/287 dated 29/9/2021, from the result showed positive outcome.

Asia Oil Palm Estate Div. 2

In this estate there are 2 river available, Sg Tenegang and Sg Manggis. The management conducted the water analysis for this 2 river. The result (Report No R21/3/315 dated 23/3/2021) as per below;-

Sample reference	Point A	Point C	Point F
Chemical Oxygen Demand (COD) mg/l	47	55	55
Biological Oxygen Demand (BOD) mg/l	3	4	4
Ammoniacal Nitrogen mg/l	ND	ND	ND

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<table border="1"> <tr> <td>Water Quality Index</td> <td>85</td> <td>73</td> <td>75</td> </tr> </table>	Water Quality Index	85	73	75															
Water Quality Index	85	73	75																		
		<p>From the result showed slightly polluted in point C & D, the management already investigate and discuss in Joint Consultative Committee and Environmental Meeting dated 9/6/2021. On 5 May 2021, the environment consultant (North Borneo Environment Services Sdn Bhd) recheck the water sampling at same river and the result (RS/CH/2021/0293 dated 25/5/2021) showed as per below:-</p>																			
		<table border="1"> <thead> <tr> <th>Sample reference</th> <th>Point A</th> <th>Point C</th> <th>Point F</th> </tr> </thead> <tbody> <tr> <td>Chemical Oxygen Demand (COD) mg/l</td> <td>17</td> <td>5.6</td> <td>17</td> </tr> <tr> <td>Biological Oxygen Demand (BOD) mg/l</td> <td>3</td> <td>2.8</td> <td>3.1</td> </tr> <tr> <td>Ammoniacal Nitrogen mg/l</td> <td>ND</td> <td>ND</td> <td>ND</td> </tr> </tbody> </table>			Sample reference	Point A	Point C	Point F	Chemical Oxygen Demand (COD) mg/l	17	5.6	17	Biological Oxygen Demand (BOD) mg/l	3	2.8	3.1	Ammoniacal Nitrogen mg/l	ND	ND	ND	
Sample reference	Point A	Point C	Point F																		
Chemical Oxygen Demand (COD) mg/l	17	5.6	17																		
Biological Oxygen Demand (BOD) mg/l	3	2.8	3.1																		
Ammoniacal Nitrogen mg/l	ND	ND	ND																		
<p>7.8.3</p>	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance -</p>	<p>The Mill applies the biological system equipped with ponds in series for its treatment of effluent. The quality of discharged effluent was analysed every month. This can referred Online Environmental Report (OER) and latest record as per below:-</p>			<p>Complied</p>																

		Month	Parameter	Result	
		July	BOD at 30C	16.5	
			Suspended Solid	11	
			Oil & Grease	0	
		August	BOD at 30C	18.6	
			Suspended Solid	51	
			Oil & Grease	0	
		September	BOD at 30C	9.3	
			Suspended Solid	33	
			Oil & Grease	0	
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	Mill has maintained monitoring of water usage for processing FFB which recorded every month. Water for processing is abstracted from water pond. Reviewed the water monitoring record as follows:		Complied	
		Financial Year	Water consumption/FFB		
		FY 2019/2020	1.39		
		FY 2020/2021	1.46		
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised					
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimize use of renewable energy. Data is being compiled for comparison and control for future improvement.			Complied

		<p>Diesel usage total 126,817 liter per FFB (28611mt). Rate diesel per FFB was 4.43liter/mt.</p> <p>Diesel usage for 639,025 liter per FFB (83,396.76mt). rate diesel per FFB 8.03liter/mt.</p> <p>Diesel usage for Mill was 405691.96 liter diesel with rate 11.5 liters/CPO. Generally the fossil fuel consumption in current financial year 2020/2021 for all estate are higher than last financial year 2019/2020 is contributed from the estate work activities such as replanting works, crop evacuation and road work repair. However for POM, the consumption is lower than last financial year due to efficiency of operational of Biogas Plant and Gas engine</p>	
<p>Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			
7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>Identification of significant pollutants and greenhouse gas (GHG) emissions has been done e.g. POME, methane gas, diesel / fuel and fertilizer. Their usage have been recorded and documented at each of the operating units. Approved GHG calculator, Palm GHG was used for the calculation during implementation period. A bio-gas plant which was commissioned in 2015 has been contributing in reducing the GHG emission</p>	Complied
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>The Mill and estates had reviewed the environmental impact assessment on potential pollution to water, gaseous emissions to air and contamination on land. Monitoring of mill gas emissions is being done online using the Continuous Emissions Monitoring System (CEMS) and supported by the Ringelman Smoke Chart. POME treatment, monitoring and land application is monitored, maintained and adhered to DOE regulations.</p>	Complied

7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. - Critical (Major) compliance -</p>	<p>Monitoring of the GHG quantity was done through RSPO approved calculator Palm GHG. Annual quantification of all GHG sources was input into the calculator. These calculations were done in HQ level where GHG calculations were done as per certification unit basics. Stack emission monitoring In Asia POM was done 6 monthly basis. The latest record was on September 2021 (Boiler no.2) and June 2021(Boiler no.1) the result as per below:-</p> <table border="1" data-bbox="1137 603 1930 817"> <thead> <tr> <th>Description</th> <th>Average Emission @12CO2</th> <th>Dust mg/m3</th> <th>Limit matter</th> <th>Particulate</th> </tr> </thead> <tbody> <tr> <td>Boiler No. 2</td> <td>111.3</td> <td></td> <td>150</td> <td></td> </tr> <tr> <td>Boiler No.1</td> <td>129.0</td> <td></td> <td>150</td> <td></td> </tr> </tbody> </table>	Description	Average Emission @12CO2	Dust mg/m3	Limit matter	Particulate	Boiler No. 2	111.3		150		Boiler No.1	129.0		150		Complied
Description	Average Emission @12CO2	Dust mg/m3	Limit matter	Particulate														
Boiler No. 2	111.3		150															
Boiler No.1	129.0		150															
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area																		
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -</p>	<p>JC Chang Group has established Guidelines on Group Long Term Replanting Planning. Refer document No A/016-07/2020, stated the company prohibited the form of replanting by using fire as part of field preparation. All old palm that will be replanting will be felled, chipped, staked and decomposed naturally.</p>	Complied															
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -</p>	<p>JC Chang Group has established Guidelines on Fire Prevention Control and stakeholder engagement as per document no M/017-03/2020 dated 17/10/2020. This guidelines included of selection, placement, use, maintenance and inspection of fire extinguisher, fire drill to reduce the fire risks to minimal level.</p>	Complied															
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -</p>	<p>JC Chang Group has established Guidelines on Fire Prevention, Control and stakeholder engagement. The Fire prevention briefing been given to stakeholder was on 22/4/2021. Give guidelines on</p>	Complied															

		fire prevention, control and stakeholder engagement (M/017-03/2020) dated 17/1/2020.	
Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	Not applicable since there is no land clearing after 15 Nov 2018.	Not Applicable
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>Asia Production Unit conducted the HCV assessment report conducted on 03-10/4/2011 and 7-8/6/2011 as per social & environmental assessment including a preliminary management review, JC Chang groups Asia and Melewar production units Sabah, Malaysia dated 13/7/2011. No HCV been identified within Asia Production.</p> <p>The latest HCV assessment conducted for new acquired land in Hwa Li Div 3 Estate available, report dated 23/7/2020 assess by Mr Seow Chee Chiang. No HCV in the new acquired land as per report verification.</p>	Complied
7.12.3	<i>Indicator is not applicable in Malaysia context</i>		Not Applicable

7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). - Critical (Major) compliance -</p>	<p>Not applicable since there is no land clearing after 15 Nov 2018. However, the management plan been reviewed yearly basis by management team. Among the plan such as ;-</p> <ul style="list-style-type: none"> • To educate the workers regarding to HCV and RTE • To communicate to the stakeholder to increase their their awareness regarding to impact on illegal hunting and RTE protection. • To implement the IPM for reduce the pollution that impact to environment • To ensure all signage for HCV, no hunting and No fishing in estate in good condition. • To monitor the fauna or any RTE species in estate 	Complied
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. - Minor compliance -</p>	<p>Not applicable since there is no land clearing after 15 Nov 2018. No grievances or land claim by the stakeholder verified as per interview and site verification.</p>	Complied
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. - Minor compliance -</p>	<p>The Asia Production unit conducted the HCV assessment on 3-10/04/2011 and 7-8/6/2011 as per Social &Environment assessment including a preliminary Management review. The latest HCV assessment conducted for new acquired land in Hwa Li Div 3 Estate available, report dated 23/7/2020 assess by Mr Seow Chee Chiang. No HCV in the new acquired land as per report verification. No rare, threatened or endangered (RTE) species are identified within Asia Production Unit as per assessment conducted. The monitoring was done periodically by management to ensure no hunting, capture, harm, collect, trade, possess or kill any fauna that</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		been identified in the estate. The monitoring record referred indicator 7.12.7.	
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. - Minor compliance -	<p>Melewar Div 2 Estate</p> <p>Monitoring record done quarterly by management and latest record was on 7/9/2021 and previously record was on 30/6/2021. Last monitoring for RTE record was on 7/9/2021 at Field PM 95C2. Training on HCV for no hunting and no fishing dated 20/8/2021. Training on riparian dated 10/3/2021</p> <p>Hwa Li Div 3 Estate</p> <p>Monitoring record done quarterly by management and latest record was on 4/10/2021. Last monitoring for RTE record was on 14/10/2021 at Field PM 96B6. Training on HCV for no hunting and no fishing dated 10/2/2021.</p>	Complied
7.12.8	(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies. - Critical (Major) compliance -	No land clearing since November 2005 without prior HCV assessment, or without prior HCV-HCSA assessment since 15 November 2018 within Asia Production unit, thus this indicator not applicable	Complied

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2021** for **Asia POM** and supply base was calculated using the PalmGHG Calculator version 4. 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 **2021** for **Asia POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.97
PKO	0

Extraction	%
OER	19.47
KER	5.40

Production	t/yr
FFB Process	187,812.15
CPO Produced	36571.77
PKO Produced	10145.135

Land Use	Ha
OP Planted Area	13119.58
OP Planted on peat	109.40
Conservation (forested)	0.00
Conservation (non-forested)	417.00
Total	13645.98

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	68520.32	0.48	11410.95	0.44	0.00	0.00	79931.27	0.92
CO ₂ Emission from fertilizer	5406.77	0.04	1303.66	0.05	0.00	0.00	6710.42	0.09
NO ₂ Emission	4051.30	0.03	1056.91	0.04	0.00	0.00	5108.21	0.07
Fuel Consumption	2153.20	0.01	476.96	0.02	0.00	0.00	2630.16	0.01
Peat Oxidation	0.00	0.00	1267.68	0.05	0.00	0.00	1267.68	0.05
Sink								
Crop Sequestration	-51757.40	-0.36	-6125.06	-0.24	0.00	0.00	-57882.46	-0.60
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	28374.18	0.20	9391.10	0.37	0.00	0.00	39600.95	0.57

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	4545.18	0.02
Fuel Consumption	1255.96	0.01
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	5801.14	0.03

Summary of Kernel Crusher Emission and Credit (if applicable)

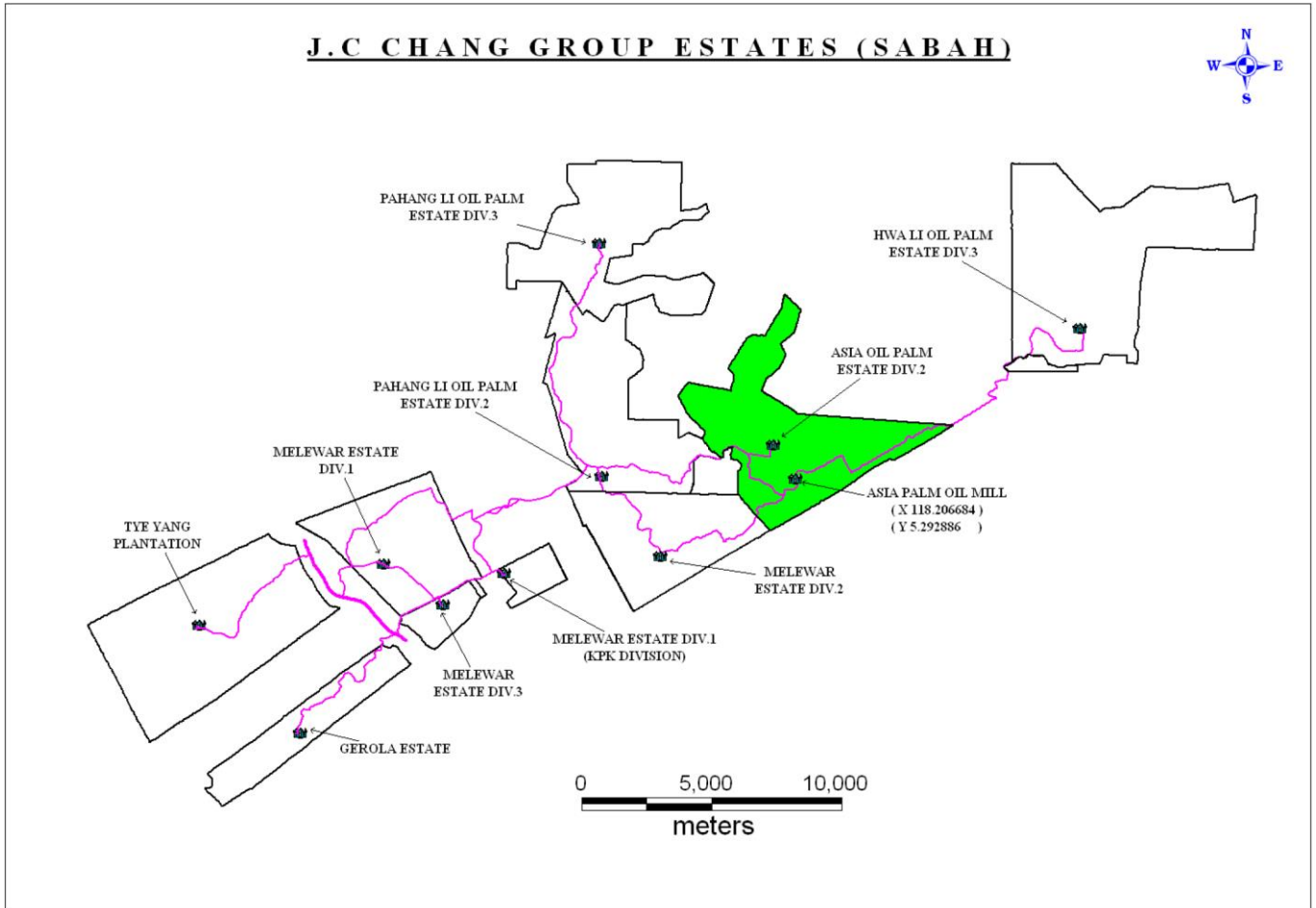
Emissions	tCO₂e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

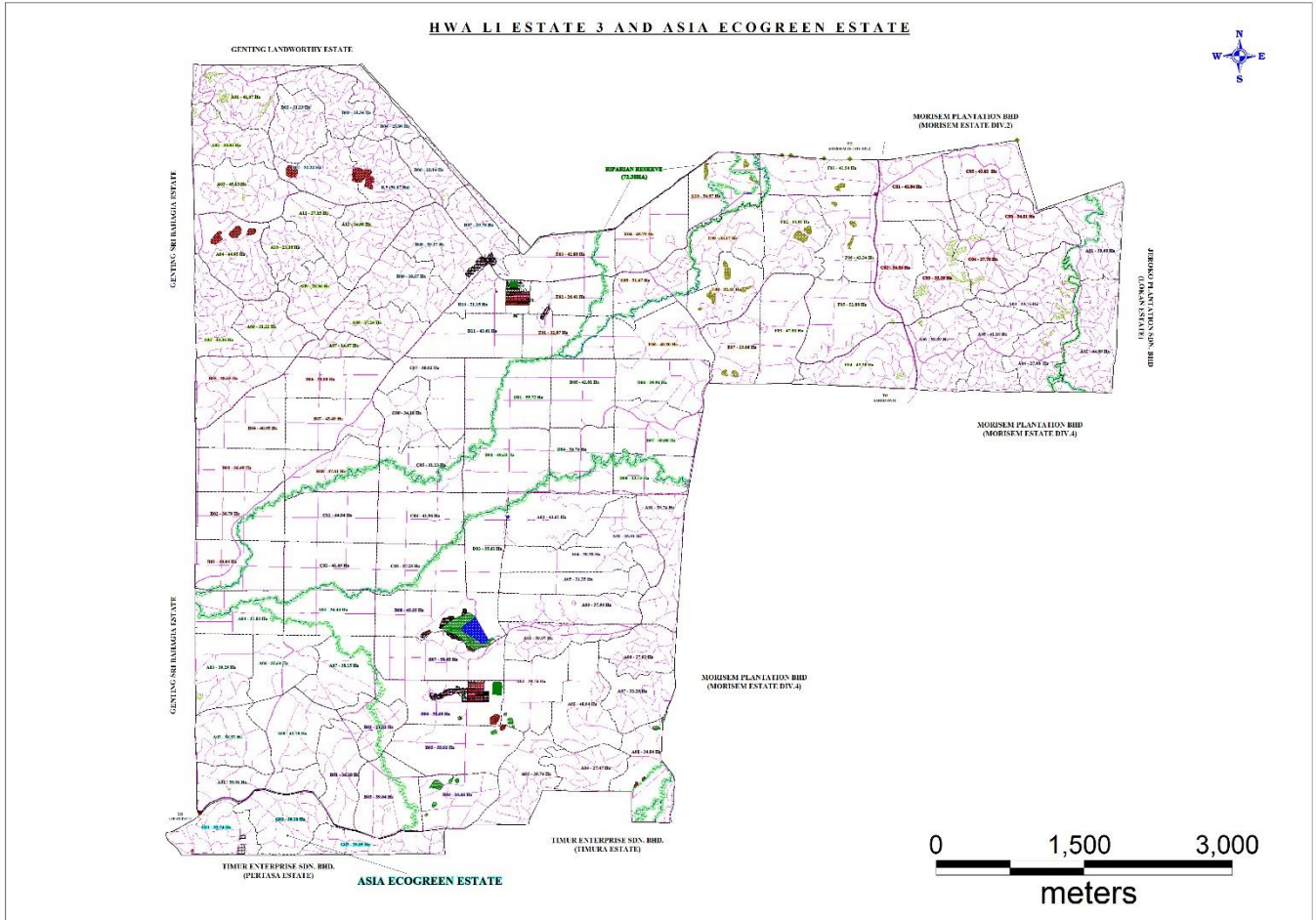
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	0
Divert to methane captured (flaring) (%)	5
Divert to methane captured (energy generation) (%)	95

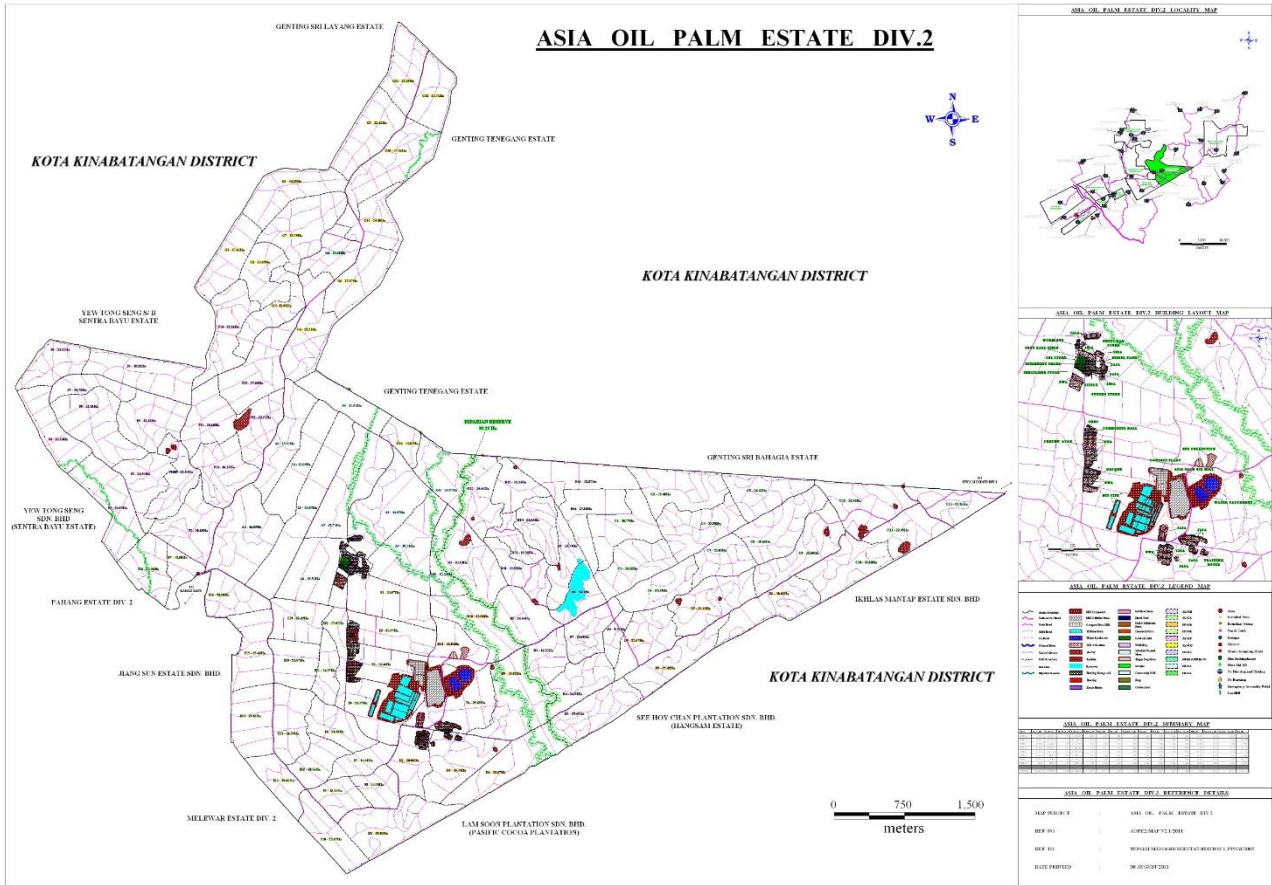
Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map



RSPO P&C Public Summary Report
Revision 12 (Jun 2021)



RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Appendix E: List of Smallholder Registered and sampled

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
	Nil								
Total									
Note: * are smallholders sampled in this audit.									

Appendix F: 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
ISS	Independent Smallholder Standard
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
VMO	Visiting Medical Officer