

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (2\_3)
- Recertification Assessment (Choose an item.)
- Extension of Scope

<b>Client Company name (Parent Company):</b> <b>Johor Corporation</b>
Client company Address: Level 16, Menara Komtar, Johor Bahru City Centre, 80000 Johor Bahru, Johor, Malaysia.
Certification Unit: <b>Kulim (Malaysia) Berhad – Sindora Palm Oil Mill</b>
Location of Certification Unit: KM 23 Jalan Kota Tinggi - Kluang, 86000 Kluang, Johor, Malaysia
Date of Final Report: 25/07/2022

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### Section 1: Scope of the Assessment

1. Company Details			
<b>Parent Company</b>	Johor Corporation		
<b>RSPO Membership Number</b>	1-0080-09-000-00	<b>Membership Approval Date</b>	15/06/2009
<b>Address</b>	Level 16, Menara Komtar, Johor Bahru City Centre, 80000 Johor Bahru, Johor, Malaysia.		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	Kulim (Malaysia) Berhad – Sindora Palm Oil Mill		
<b>Location / Address</b>	KM 23 Jalan Kota Tinggi - Kluang, 86000 Kluang, Johor, Malaysia		
<b>Website</b>	<a href="http://www.kulim.com.my">www.kulim.com.my</a>		
<b>Management Representative</b>	Salasah Elias	<b>E-mail</b>	<a href="mailto:salasah@kulim.com.my">salasah@kulim.com.my</a>
<b>Telephone</b>	+607-8611611	<b>Facsimile</b>	+607-8631084

2. Certification Information			
<b>Certificate Number</b>	RSPO 612392	<b>Certificate Start Date</b>	23/01/2019
<b>Date of First Certification</b>	23/01/2009	<b>Certificate Expiry Date</b>	22/01/2024
<b>Scope of Certification</b>	Production of Palm Oil and Palm Kernel		
<b>Visit Objectives</b>	<ul style="list-style-type: none"> <li>• Determination of the conformity of the client's management system, or parts of it, with audit criteria</li> <li>• Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements</li> <li>• 70% onsite assessment as continuation to 30% remote assessment</li> </ul>		
<b>Assessment Cycle</b>	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_3) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
<b>Applicable Standards / Normative Reference</b>	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		
<b>Supply Chain Module</b>	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	<b>Mill Capacity</b>	60 mt/hr
<b>ISH certification Phase</b>	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

<b>3. Other Certifications</b>			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
MSPO 697951	MS 2530-4:2013	BSI Services (M) Sdn Bhd	29/03/2024
EU-ISCC-cert-PL214-20240221	ISCC EU	Bureau Veritas Certification	26/04/2022
ISCC-PLUS-cert-PL214-20240221	ISCC PLUS	Bureau Veritas Certification	26/04/2022
A158822	MS 1500:2009	JAKIM	15/09/2023

<b>4. Location(s) of Mill &amp; Supply Bases</b>			
<b>Name (Mill / Supply Base / Group Manager / Smallholders)</b>	<b>Location</b>	<b>GPS Coordinates</b>	
		<b>Latitude</b>	<b>Longitude</b>
Sindora POM	KM 23, Jalan Kota Tinggi – Kluang, 86000 Kluang, Johor Malaysia	1° 59' 07.34" N	103° 27' 44.32" E
Sindora Estate	KM 23, Jalan Kota Tinggi – Kluang, 86000 Kluang, Johor Malaysia	1° 57' 47.47" N	103° 27' 59.62" E
REM Estate	KM 36 Johor Bahru, 81909 Kota Tinggi, Johor Malaysia	1°42' 12.43"N	103° 52' 54.96"E
Sg Papan Estate	KM 59 Kota Tinggi, Jalan Belungkor, 81606 Pengerang Johor, Malaysia	1° 31' 01.25"N	104° 6' 21.81"E
Basir Ismail Estate	Lot 1419, Geran 22664, Mukim Sg. Tiram, Daerah Johor Bahru, Johor Darul Takzim	1° 37' 47.84" N	103° 54' 52.07" E

<b>5. Description of Supply Base</b>					
<b>New Planting Development</b>	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
<b>Estate / Smallholders</b>	<b>Total Planted (Mature + Immature) (ha)</b>	<b>HCV (ha)</b>	<b>Infrastructure &amp; Other (ha)</b>	<b>Total Area (ha)</b>	<b>% of Planted</b>
Sindora Estate	3,655.04	20.21	243.81	3,919.06	93.26
REM Estate (including Ulu Tiram Estate)	2,344.21	44.86	510.53	2,899.6	80.86
Sg Papan Estate	2,834.42	11.49	149.94	2,995.85	94.61
Basir Ismail Estate	2,906.77	50.69	239.17	3,196.63	90.93
<b>Total</b>	<b>11,740.44</b>	<b>127.25</b>	<b>1,143.45</b>	<b>13,011.14</b>	

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**Notes:** 2 of the estates to be merged into 1 estate, i.e. Ulu Tiram and REM Estate. One additional estate to be added into the certification scope; Basir Ismail Estate and audited during 70% remaining onsite audit.

6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Sindora Estate	385.69	2307.19	962.16	0	0	3,269.35	385.69
REM Estate (including Ulu Tiram Estate)	481.92	1193.46	288.87	28.38	351.58	1,862.29	481.92
Sg Papan Estate	0	966.8	1867.62	0	0	2,834.42	0
Basir Ismail Estate	377.27	1247.9	999.92	281.68	0	2,529.5	377.27
<b>Total (ha)</b>	<b>1,244.88</b>	<b>5,715.35</b>	<b>4,118.57</b>	<b>310.06</b>	<b>351.58</b>	<b>10,495.56</b>	<b>1,244.88</b>

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Jan 21-Dec 21)	Actual (Oct 2020 - Sept 2021)		Forecast (Jan 22-Dec 22)
		Previous license period (Oct 20 - Jan 21)	Current license period (Feb 21 - Sept 21)	
Sindora Estate	64,584.00	16,854.10	42,164.68	72,285
REM Estate	27,254.00	7,721.63	19,071.13	51032
Sg Papan Estate	78,909.00	2,0058.53	13,898.11	80,532
Basir Ismail Estate	0	0	0	61,703
<b>Total</b>	<b>170,747</b>	<b>119,768.18</b>		<b>265,552</b>

**Note:** Basir Ismail Estate is still under Sedenak POM certification unit.  
Volume extension for FFB = 27,272.73 mt

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Jan 21-Dec 21)	Actual (Oct 2020 - Sept 2021)		Forecast (Jan 22-Dec 22)
		Previous license period (Oct 20 - Jan 21)	Previous license period (Feb 21 - Sept 21)	
Eng Lee Heng		3,701.01	0	
Siang Estate		0	261.90	

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Mutiara Estate		0	3,133.31	
Selai Estate		0	1,358.89	
Enggang Estate		0	1,632.20	
Tawing Estate		0	1,809.40	
Tereh Selatan Estate		0	1,737.44	
Tereh Utara Estate		0	1,637.43	
<b>Total</b>			<b>15,271.58</b>	

<b>9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)</b>				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Jan 21-Dec 21)	Actual (Oct 2020 - Sept 2021)		Forecast (Jan 22-Dec 22)
		Previous license period (Oct 20 – Jan 21)	Previous license period (Feb 21 – Sept 21)	
3 <sup>rd</sup> party FFB supplier		28,374.67	78,763.49	
<b>Total</b>		<b>107,138.16</b>		

**Note:** No uncertified crop received since 31/12/21. Thus, mass balance module is no more applicable for Sindora POM.

<b>9A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Oct 20	14,910.430	6,838.22	21,748.65
2	Nov 20	14,643.150	6,932.16	21,575.31
3	Dec 20	13,874.040	6,890.31	20,764.35
4	Jan 21	4,907.650	7,381.82	12,289.47
5	Feb 21	4,420.140	9,897.32	14,317.46
6	Mar 21	8,484.360	12,117.17	20,601.53
7	Apr 21	6,848.780	11,948.98	18,797.76
8	May 21	9,090.610	11,028.30	20,118.91
9	June 21	22,295.28	5,598.12	27,893.40
10	July 21	17,091.700	6,925.23	24,016.93
11	Aug 21	8,559.220	8,921.99	17,481.21
12	Sept 21	9,914.400	12,658.54	22,572.94

<b>TOTAL</b>	135,039.76	107,138.16	242,177.92
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<b>10. Summary of Certified Tonnage (not applicable for ISS)</b>			
<b>Estimated last year (Jan 21-Dec 21)</b>	<b>Actual (Oct 2020 - Sept 2021)</b>		<b>Forecast (Jan 22-Dec 22)</b>
	Previous license period (Oct 20 – Jan 21)	Previous license period (Feb 21 – Sept 21)	
<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
198,019.73 mt	48,335.27 mt	86,704.49 mt	265,552 mt
	135,039.76 mt		
<b>CPO (OER: 22.99 %)</b>	<b>CPO (OER: 20.66 %)</b>		<b>CPO (OER: 21.99.00%)</b>
43,529.98 mt	9,004.82 mt	18,899.71 mt	58,421 mt
	27,904.53 mt		
<b>PK (KER: 4.99 %)</b>	<b>PK (KER: 5.11 %)</b>		<b>PK (KER: 4.49%)</b>
9,898.30 mt	2,237.76 mt	4,662.10 mt	11,949 mt
	6,899.86 mt		

<b>10A. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	Oct 20	3,166.57	793.35
2	Nov 20	3,014.93	738.43
3	Dec 20	2,823.32	705.98
4	Jan 21	960.86	247.26
5	Feb 21	943.56	229.73
6	Mar 21	1,765.55	447.30
7	Apr 21	1,392.29	375.99
8	May 21	1,885.95	455.07
9	June 21	4,681.38	1,059.36
10	July 21	3,467.83	849.52
11	Aug 21	1,753.13	458.09
12	Sept 21	2,049.16	539.78
	<b>TOTAL</b>	<b>27,904.53</b>	<b>6,899.86</b>

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<b>11. Summary of Actual Volume sold</b>					
<b>Current License period (Jan 2021-Sept 2021)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>CPO (MT)</b>	1,554.21	0	0	11,643.02	13,197.23
<b>PK (MT)</b>	4,624.37	0	0	25.12	4,649.49
<b>Credits</b>	4,000	0	0	0	4,000
<b>Previous License period (Oct 2020 – Dec 2020)</b>					
<b>CPO (MT)</b>	153.25	0	0	7,729.43	7,882.68
<b>PK (MT)</b>	2,050.10	0	0	58.11	2,108.21
<b>Credits</b>	0	0	0	0	0

**Note:** Conventional is RSPO certified material but sold as non-RSPO

<b>11A. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any) (Dec 2020-Nov 2021)</b>				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	ABC	NA	1,707.46	-
2	XYZ	NA	-	6,674.47
<b>TOTAL</b>			<b>1,707.46</b>	<b>6,674.47</b>

<b>11B. Records of CPO &amp; PK Sold under other schemes since the last audit (if any) (Dec 2020-Nov 2021)</b>				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
	Nil			
<b>TOTAL</b>				

<b>11C. Records of CPO &amp; PK Sold as conventional since the last audit (if any) (Dec 2020-Nov 2021)</b>				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1	UVW	19,372.45	-	
2	FGH	-	82.33	
<b>TOTAL</b>		<b>19,372.45</b>	<b>83.23</b>	



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<b>11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any) (Dec 2020-Nov 2021)</b>			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
1	DEF	-	4,000
<b>TOTAL</b>			<b>4,000</b>

<b>12. Independent Smallholders Certified Tonnage / Volume - NA</b>									
Phase	Estimated last year (key in period)			Actual (key in period)			Forecast (key in period)		
	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									

<b>13. Independent Smallholders Actual Sold Tonnage / Volume -NA</b>						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
<b>Current License period (key in period)</b>						
Credits						
Physical						

## 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  
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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 21-22/2/2022 and 5-7/4/2022. The first onsite assessment (21-22/2/2022) was prematurely terminated due to current outbreak in the estate. The audit programme is included as Section 2.3. Due to the COVID-19 pandemic, this assessment involved a partial remote audit as allowed by RSPO Secretariat – RSPO P&C On-site & Remote Audits dated 24<sup>th</sup> March 2020. The remote audit was conducted on 25-26/10/2021.

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 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. This assessment is also to complete the remaining 70% assessment after 30% of it was completed in Apr 2022. Apart from that, the client has also applied 2 of the estates to be merged into 1 estate, i.e. Ulu Tiram and REM Estate. One additional estate to be added into the certification scope; Basir Ismail Estate and audited during 70% remaining onsite audit.

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.

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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.

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 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)
Sindora Palm Oil Mill	✓	✓	✓	✓	✓
Sindora Estate	✓	✓	✓	✓	✓
REM Estate	✓	✓	✓	✓ (Ulu Tiram Estate)	✓
Sg Papan Estate	✓	✓	✓	✓	✓
Basir Ismail Estate	Previously under different certification unit.			✓	✓

**Tentative Date of Next Visit: October 23, 2022 - October 27, 2022**

**Total Number of Mandays: 15**

**2.2 BSI Assessment Team**

Name	Role	Competency
Mohd Hidhir Zainal Abidin (MHZ)	Team Leader	<p><b>Education:</b> Bachelor Degree in Chemical Engineering, National University of Malaysia</p> <p><b>Work Experience:</b></p> <ol style="list-style-type: none"> <li>7 years working experience in palm oil industry specifically on palm oil milling for 5 years</li> <li>Auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO since 2012</li> </ol> <p><b>Training attended:</b></p> <ol style="list-style-type: none"> <li>ISO 9001 Lead Auditor Course</li> <li>ISO 14001 Lead Auditor Course</li> <li>OHSAS 18001 Lead Auditor Course in 2012</li> <li>Endorsed RSPO P&amp;C Lead Auditor Course in 2013</li> <li>MSPO Awareness Training in 2014</li> <li>Endorsed RSPO SCCS Lead Auditor Course</li> </ol>

		<p>7) SMETA Auditor training</p> <p><b>Aspect covered in this audit:</b>  Legal requirements, policies and commitment, social aspects, contract agreement, human rights, land use rights, workers' welfare, and supply chain.</p> <p><b>Language proficiency:</b>  English and Bahasa Malaysia</p>
Valence Shem (VSH)	Team Leader	<p><b>Education:</b>  BTech (Hons) Bachelor Degree in Industrial Technology, University of Science Malaysia</p> <p><b>Work Experience:</b></p> <ol style="list-style-type: none"> <li>1) 9 years working experience in oil palm plantation industry</li> <li>2) Management system auditing since 2009 for various standards such as ISO 140001, RSPO P&amp;C, RSPO SCCS, MSPO and SMETA</li> </ol> <p><b>Training attended:</b></p> <ol style="list-style-type: none"> <li>1) ISO 14001 Lead Auditor Course</li> <li>2) ISO 9001 Lead Auditor Course</li> <li>3) Endorsed RSPO P&amp;C Lead Auditor Course</li> <li>4) Endorsed RSPO SCCS Lead Assessor Course</li> <li>5) MSPO Awareness Training</li> <li>6) ISO 45000 Lead Auditor Course</li> <li>7) SMETA Auditor training</li> <li>8) HCV-HCS training</li> <li>9) RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course</li> </ol> <p><b>Aspect covered in this audit:</b>  Legal requirements, natural and HCV conservation, water &amp; wastes management, environmental aspects, occupational health and safety, GAP, mill best practices, training, economic management plan and supply chain.</p> <p><b>Language proficiency:</b>  English and Bahasa Malaysia</p>
Nor Halis Abu Zar (NHA)	Team Member	<p><b>Education:</b>  Bachelor of Science, Plantation Technology and Management, Universiti Teknologi Mara</p> <p><b>Work Experience:</b></p> <ol style="list-style-type: none"> <li>1) 6 years working experience in palm oil industry</li> <li>2) Auditor for several standards including MSPO and RSPO since 2019</li> </ol> <p><b>Training attended:</b></p> <ol style="list-style-type: none"> <li>1) ISO 9001 Lead Auditor Course in January 2019</li> <li>2) 14001 Lead Auditor Course in January 2019</li> <li>3) MSPO 2530:2013 Lead Auditor Course in February 2019</li> <li>4) RSPO Lead Auditor Course in October 2020</li> </ol>

		<p>5) SMETA Auditor training</p> <p><b>Aspect covered in this audit:</b>            Legal requirements, natural and HCV conservation, water &amp; wastes management, environmental aspects, training, and economic management plan.</p> <p><b>Language proficiency:</b>            English and Bahasa Malaysia</p>
Dr Suhaili Sahari	Peer reviewer	<p><b>Education:</b> Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato’ Mohd Muda.</p> <p><b>Work Experience:</b> Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p><b>Training attended:</b></p> <ol style="list-style-type: none"> <li>1. ISO 9001:2015 Lead Auditor and Internal Auditor</li> <li>2. ASI Peer Reviewer training</li> <li>3. Safety and health</li> <li>4. ISO 14001:2015 Standard</li> <li>5. RSPO Standards: RSPO P&amp;C 2018 MY-NI 2019</li> <li>6. MSPO Standards : MS 2530 : 2013 part 1, 2 , 3 and 4</li> <li>7. Problem Solving Technique : 8 D, ICC, QCC, Systematic PS</li> <li>8. HACCP MS 1480:2019</li> <li>9. GAP Standard : Global GAP, Euru GAP</li> </ol>

**Accompanying Persons:**

Name	Role
Nil	

**1.3 Assessment Plan**

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

**Remote assessment plan (30%)**

Date	Time	Subjects	MH	VS	ICT Planned
Wednesday, 20/10/2021	1000 – 1100	Proposed preparatory/test call between client and BSI auditor. Communication on document preparation for remote/ICT audit.	√	√	MS team, WhatsApp, Teleconference, Skype, Webex, Telecon, Face-time, email
Monday, 25/10/2021  <b>Sindora POM estate &amp;</b>	0900 – 0930	Opening Meeting: <ul style="list-style-type: none"> <li>Opening Presentation by Audit team leader.</li> <li>Confirmation of assessment scope and finalize Audit plan</li> </ul>	√	√	MS team, WhatsApp, Teleconference, Skype, Webex, Telecon, Face-time, email
	0930 – 1230	Assessment and documentation review on: <ul style="list-style-type: none"> <li>Good agriculture practice, legal requirements, environment and HCV</li> <li>Legal requirements, OHS and continual improvement</li> </ul>	-	√	MS team, WhatsApp, Teleconference, Skype, Webex, Telecon, Face-time, email
	1300 – 1400	Lunch break	√	√	
	1400 – 1630	Assessment and documentation review on: <ul style="list-style-type: none"> <li>RSPO SCCS components and RSPO Rules on Market Communication and Claim</li> </ul>	√	√	MS team, WhatsApp, Teleconference, Skype, Webex, Telecon, Face-time, email
		Assessment and documentation review on: <ul style="list-style-type: none"> <li>Good milling practice, legal requirements, environment and waste management</li> <li>Legal requirements, OHS and continual improvement</li> <li>Social aspects, legal requirements, employees' welfare and stakeholder management</li> </ul>	√	√	MS team, WhatsApp, Teleconference, Skype, Webex, Telecon, Face-time, email
		Assessment and documentation review on: <ul style="list-style-type: none"> <li>Social aspects, legal requirements, employees' welfare and stakeholder management</li> </ul>	√	√	MS team, WhatsApp, Teleconference, Skype, Webex, Telecon, Face-time, email
	1630 – 1700	Interim closing – daily wrap-up	√	√	MS team, WhatsApp, Teleconference, Skype, Webex, Telecon, Face-time, email

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Date	Time	Subjects	MH	VS	ICT Planned
Tuesday, 26/10/2021  <b>REM and Sg Papan Estate</b>	0900 - 1300	Assessment and documentation review on: <ul style="list-style-type: none"> <li>• Good agriculture practice, legal requirements, environment and HCV</li> <li>• Legal requirements, OHS and continual improvement</li> </ul>	-	√	MS team, WhatsApp, Teleconference, Skype, Webex, Telecon, Face-time, email
		Assessment and documentation review on: <ul style="list-style-type: none"> <li>• Social aspects, legal requirements, employees' welfare and stakeholder management</li> </ul>	√	-	MS team, WhatsApp, Teleconference, Skype, Webex, Telecon, Face-time, email
	1300 - 1400	Lunch break	√	√	
	1400 - 1630	Continue with unfinished elements	√	√	MS team, WhatsApp, Teleconference, Skype, Webex, Telecon, Face-time, email
	1630 - 1700	Closing meeting	√	√	MS team, WhatsApp, Teleconference, Skype, Webex, Telecon, Face-time, email

**On-site assessment plan (70%)**

Date	Time	Subjects	MH	VS	NH
Sunday 20/2/2022	PM	Audit team travel to Johor Bahru. Check in at Holiday Villa, Johor Bahru	√	√	√
Monday 21/02/2022  <b>Basir Ismail Estate</b>	0730	Audit team travel to Basir Ismail Estate	√	√	√
	0830 - 0900	Opening Meeting: <ul style="list-style-type: none"> <li>• Opening Presentation by Audit team leader.</li> <li>• Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation).</li> <li>• Verification on previous audit findings</li> </ul>			
	0900 - 1300	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc	√	√	√
	1030 - 1230	Meeting with stakeholders (Government, village rep, smallholders, workers representative, contractor etc.)	√	-	-
	1300 - 1400	Lunch	√	√	√
	1400 - 1630	<b>Basir Ismail Estate</b> 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 22/02/2022  <b>REM Estate &amp; Ulu Tiram Estate</b>	0730	Audit team travel to <b>REM &amp; Ulu Tiram Estate</b>	√	√	√
	0830 - 1300	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.			
	1000 - 1230	Meeting with stakeholders (Government, village rep, smallholders, workers representative, contractor etc.)	√	-	-
	1300 - 1400	Lunch break	√	√	√
1400 - 1630	<b>REM &amp; Ulu Tiram Estate</b> Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM	√	√	√	



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		& HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).			
	1630 - 1700	Interim Closing Briefing	√	√	√

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*\*Audit was prematurely terminated due to COVID19 outbreak at Sg Papan and Sindora Estate.*

Date	Time	Subjects	MH	VS	NH
Monday 4/4/2022	PM	Audit team travel to Johor Bahru. Check in at Holiday Villa, Johor Bahru	√	√	√
Tuesday 5/4/2022  <b>Sg Papan Estate</b>	0730 - 0830	Travel to <b>Sg Papan Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	√	√	√
	1000 - 1230	Meeting with stakeholders (Government, village rep, smallholders, workers representative, contractor etc.)	√	-	-
	1300 - 1400	Lunch break	√	√	√
	1400 - 1630	<b>Sg Papan Estate</b> 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 6/4/2022  <b>Sindora POM &amp; Estate</b>	0730 - 0830	Travel to <b>Sindora POM and Estate</b> <b>Sindora POM</b> Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc. Visit to laboratory, weighbridge and palm product storage area.  <b>Sindora Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	√	√
1000 - 1230		Meeting with stakeholders (Government, village rep, smallholders, workers representative, contractor etc.)	√	-	-
1300 - 1400		Lunch break	√	√	√
1400 - 1630		<b>Sindora POM and estate</b> Document Review P1 – P7: SOPs. Review of wage records,	√	√	√

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		employee data, training records, legal permits, mill inspection and internal monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives CIP & implementation etc			
	1630 - 1700	Presentation of finding and closing meeting	√	√	√
Thursday 7/4/2022  <b>Sindora POM</b>	0730	Auditor travel to Sindora POM	√	-	-
	0830 - 1200	Opening meeting for SCC module upgrading RSPO Supply chain requirements for mill (upgrading of MB to IP) - Identity Preserved Module - Internal Audit - Outsourcing activities - Purchasing and Goods In - Sales and Goods Out - Outsourcing Activities - Record keeping - Extraction Rate - Processing - Registration of transaction - Claims			
	1200-1230	Closing meeting – conclusion and recommendation	√	-	-
	1300	End of audit	√	-	-

### 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, the plan includes all current subsidiaries, estates and mills that is under management control.	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	Yes, all the estates and mills have been certified within 5 years after obtaining RSPO membership except Palm Oil Plantations Asset at Indonesia (SUMSEL) following resolutions by Board of Director of Kulim to disposal of Palm Oil Plantations Asset at Indonesia (SUMSEL) on 2021.	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.	There have not been any new acquisitions.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	There have no any deviations from the maximum periods requires approval by the RSPO Secretariat.	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?	There has no any changes to the time-bound plan since the last audit. This is consistent with the latest ACOP2020 reporting.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	There is no isolated lapse in Time Bound Plan except for smallholder proposed certification program that halted due to unstable supply to mill.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised	There has been no fundamental failure to proceed with the implementation of the plan.	Complied
<b>Un-Certified Units or Holdings</b>		
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.	There is no new plantings that replace primary forest.	Complied
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	There are no new plantings since January 1 <sup>st</sup> 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,	There is No land conflict under all certification units as verified in the RSPO RaCP Tracker, updated 01/02/2022.	Complied

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4.6, 4.7 and 4.8.		
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	There is no labour dispute.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	There is No legal non-compliance.	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.	No internal audit have been conducted for uncertified estates in Indonesia following resolutions by Board of Director of Kulim to disposal of Palm Oil Plantations Asset at Indonesia (SUMSEL).	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?	N/A	Complied
Have there been any stakeholder (including NGO) consultation conducted?	N/A	Complied

**3.2 Progress of scheme smallholders and/or outgrowers**

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Not applicable as there is no smallholder scheme under Sindora Certification Unit.	Complied

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**Approved Time Bound Plan**

Project	Estate	Plan
Indonesia	PT RAJ	Kulim Malaysia Berhad had completed the acquisition in 2016. The rehabilitation was done for 3 years and completed in 2019. Kulim Malaysia Berhad has agreed to proceed with Sales and Purchase Agreement ("SPA") to dispose two oil palm plantation assets in South Sumatera, Indonesia during special BOD meeting held on 20 <sup>th</sup> October 2021. RSPO certification Time Bound Plan (TBP) was initially scheduled for completion in 2023 - application to revise the TBP from 2023 to 2025 been submitted for approval by RSPO on March 27, 2022.
	PT TPR	
Kulim Estate	Bukit Layang Estate	Certified RSPO in 2020
Trader	Eng Lee Heng	Certified RSPO in 2020 under Wild Asia Sdn. Bhd (Wild Asia Group Scheme)

**List of Estate Managed by KULIM**

Mill Base	Estate	Estate	Status	Remarks
Tereh Mill	Kulim Estate	TEREH SELATAN	Certified RSPO in March 2009	<p>The total number of our Operating Units are now been reduced to 21 due to merger exercise between the following estates marked * that took effect from 01 January 2021.</p> <ol style="list-style-type: none"> <li>Selai &amp; Enggang under the name of Selai Estate</li> <li>Mutiara &amp; Sg Sembrong under the name of Mutiara Estate</li> <li>REM &amp; Ulu Tiram under the name of REM Estate</li> <li>Mungka &amp; Sepang Loi under the name of Mungka Estate</li> <li>Palong &amp; Kemedak under the name of Palong Estate</li> <li>Pasir Panjang &amp; Bukit Payung under the name of Pasir Panjang Estate</li> </ol> <p>**The SINDORA POM supply bases been changed, to add in the following supply bases :</p> <ol style="list-style-type: none"> <li>Basir Ismail Estate</li> <li>Ulu Tiram Estate</li> </ol>
		TEREH UTARA		
		SG. TAWING		
		RENGAM		
		*SELAI		
		*ENGGANG		
		*MUTIARA		
*SG. SEMBRONG				
Sindora Mill		SINDORA		
		SUNGAI PAPAN		
		**BASIR ISMAIL		
Sedenak Mill		*REM		
		* **ULU TIRAM		
		SEDENAK		
Palong Mill	KUALA KABONG			
	UMAC			
	LABIS BAHRU			
	*MUNGKA			
	*SEPANG LOI			
	*PALONG			
	*KEMEDAK			
*PASIR PANJANG				

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Pasir Panjang Mill		*BUKIT PAYUNG	Certified RSPO in March 2017	
		SIANG		
		BUKIT KELOMPOK		
		TUNJUK LAUT		
		PASIR LOGOK		

### 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 2 (two) Critical; 0 (zero) Minor nonconformities and 0 (zero) Opportunity For Improvement raised. The *Sindora Palm Oil Mill* Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the 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			
<b>NCR Ref #</b>	2186605-202204-M1	<b>Date Issued</b>	7/4/2022
<b>Due Date</b>	6/7/2022	<b>Date of nonconformity Closure</b>	20/5/2022
<b>Clause &amp; Category (Critical / Minor)</b>	6.7.3 (Critical)		
<b>Statement of Nonconformity:</b>	Workers were found not wearing appropriate PPE during work		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	At Sungai Papan Estate, it was found that a mechanical buffalo driver and FFB ramp attendant were not wearing safety shoes during work as what required in the company's Safe Operating Procedure (SOP). Apart from that, at Sindora Estate, it was found that the workshop foreman was not provided with personal hearing protection (PHP) with at least NRR 30 dB, as recommended in the Noise Risk Assessment report [HQ/18/PEB/00/00014-2021/019], received on 17/02/2022.		
<b>Corrections:</b>	<p>Sg Papan Estate                      Estate Management has been conducted refresher on PPE to all MB Driver and Ramp Attendant on 6 April 2022.</p> <p>Sindora Estate                      Estate Management immediately had purchased the earplug and provide to workshop operator on 10/4/2022</p>		
<b>Root Cause Analysis:</b>	<p>Sungai Papan Estate                      Negligence by MB Driver of the important to wear personal protective equipment (PPE) for workers i.e. safety shoes.</p> <p>Sindora Estate</p>		



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	Management of Change (MOC) process was not effectively implemented by Estate Management i.e. personal hearing protection (PHP) with at least NRR 30 dB, as recommended in the Noise Risk Assessment report
<b>Corrective Actions:</b>	<p>Sg Papan Estate</p> <ol style="list-style-type: none"> <li>1. Refresher training will be conducted regularly for all workers as per training plan.</li> <li>2. Inspection on PPE will be conducted before the workers start working as per checklist.</li> </ol> <p>Sindora Estate</p> <ol style="list-style-type: none"> <li>1. Estate Management will revise and implement any changes of process or legal requirement as per Standard Operating Procedure (SOP). The implementation will be initiated through MOC process on the implementation of action.</li> <li>2. Inspection on PPE will be conducted before the workers start working as per checklist.</li> </ol>
<b>Assessment Conclusion:</b>	<p>Major NC close out verification:</p> <ol style="list-style-type: none"> <li>1. Refresher training for MB driver and ramp attendance was carried out on 6/4/2022 and 10/4/2022 at each respective estate. Evidence of training (attendance, training materials and post training evaluation) available for verification. Interview session with ramp attendance has confirmed on the understanding of PPE compliance and OSH related issues while doing work at FFB ramp and as MB driver. Daily monitoring of PPE compliance was also done by prior to work by supervisor.</li> <li>2. Annual training plan, doc. reference SQD/SMS/3.14-F1 dated 15/4/22 was verified. Training on PPE usage has been incorporated in the revised plan and approved by the management.</li> <li>3. PPE compliance monitoring/inspection for (MB driver/ramp attendant/foreman) was done on daily basis prior to start work. Records of inspection for April and May 2022 were verified. Based on the report, PPE compliance was satisfactory implemented.</li> <li>4. Changes of processes/laws and regulations were addressed using management of change procedure (MOC). MOC has been initiated for the NRA recommendation and monitored by the management. Refer to MOC form dated 12/4/2022, MOC no. 01/2022.</li> </ol> <p>Implementation of correction and corrective action was found to be sufficient to close the Major NC on 20/5/2022. Continuous implementation will be further verified in the next assessment.</p>

<b>Non-conformity</b>			
<b>NCR Ref #</b>	2186605-202204-M2	<b>Date Issued</b>	7/4/2022
<b>Due Date</b>	6/7/2022	<b>Date of nonconformity Closure</b>	20/5/2022

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<b>Clause &amp; Category (Critical / Minor)</b>	2.2.2 (Critical)
<b>Statement of Nonconformity:</b>	The effectiveness of the legal due diligence of the contracted third parties was not satisfactorily demonstrated.
<b>Requirement Reference:</b>	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
<b>Objective Evidence:</b>	At Sungai Papan Estate, four out of six FFB trucks (i.e. reg. no.: MAR 9939, JPQ 4249, MAF 9982, BJJ 4713) own by the FFB transport contractor (Perusahaan Insan Permai) have no valid PUSPAKOM certificates at the point of audit inspection at the FFB ramp.
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>Estate Management has sent a letter to ceased operation for lorry under registration number MAR 9939, JPQ 4249, MAF 9982, BJJ 4713 until the contractor get the approval from PUSPAKOM.</li> <li>Contractor has made appointment with PUSPAKOM latest on 30 April 2022 for inspection and renew the license for MAR 9939, JPQ 4249, MAF 9982 and BJJ 4713.</li> </ol>
<b>Root Cause Analysis:</b>	Insufficient monitoring over PUSPAKOM inspection by contractor.
<b>Corrective Actions:</b>	1. Estate Management will establish the checklist of monitoring for all FFB and workers transport that in and out of the estate.
<b>Assessment Conclusion:</b>	<p>Major NC close out verification:</p> <ol style="list-style-type: none"> <li>Warning/reminder letter issued to the contractor, Perniagaan Insan Permai dated 7/4/2022 was verified. The contractor has replied that 3 out of 4 lorries were inspected and 1 lorry is still under repair.</li> <li>Evidence of PUSPAKOM inspection was verified as per the following; <ul style="list-style-type: none"> <li>MAR 9939 - inspection report ref. 5512784, valid until 5/11/2022</li> <li>JPQ 4249 - inspection report ref. 5511453, valid until 21/10/2022</li> <li>BJJ4713 - inspection report ref. 5512995, valid until 8/11/2022</li> <li>MAF9982 - reschedule for inspection on 29/5/2022, appointment no. LRDX1YLL</li> </ul> </li> <li>Checklist of lorries/fleet under Perniagaan Insan Permai was verified. Date of inspection and expiry date were monitored to ensure that only PUSPAKOM approved lorries were used by estate. Implementation of correction and corrective action was found to be sufficient to close the Major NC on 20/5/2022. Continuous implementation will be further verified in the next assessment</li> </ol>

<b>Opportunity for Improvements</b>	
<b>OFI #</b>	<b>Description</b>
Nil	

Positive Findings	
PF #	Description
PF 1	Very good cooperation and hospitality by management team/staff/sustainability team
PF 2	Good awareness on sustainability aspects among the workers and stakeholders

### 3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
<b>NCR Ref #</b>	1968123-202010-M1	<b>Date Issued</b>	22/10/2020
<b>Due Date</b>	20/01/2021	<b>Date of nonconformity Closure</b>	14/01/2021
<b>Clause &amp; Category (Critical / Minor)</b>	Critical		
<b>Statement of Nonconformity:</b>	Employment contracts 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) were not outlined accordingly.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	<p><u>Sungai Papan Estate:</u>            9 employment contracts signed by the contractor’s workers (Passport No.: B5356944, C2150443, C3814674, B572100, C2150442, C5722849, B9965016, B9965021, C3816201) were sampled and found that terms and conditions below were not stated accordingly and correctly.</p> <ul style="list-style-type: none"> <li>i. Rest day on Sunday whereas actual rest day was Saturday</li> <li>ii. Period of notice from workers</li> <li>iii. Clause 21 (d) where workers need to pay the balance of levy to the employer if they terminate the contract before the end of 2 years’ contract. Job title as General Worker whereas actual was Harvester</li> </ul>		
<b>Corrections:</b>	The said contractor had been given refresher 23rd October 2020 about Employment contracts with proper term & condition 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) as per outlined accordingly in sampled Employment Contract used by KULIM.		
<b>Root Cause Analysis:</b>	The said contractor is from Melaka that observe Sunday not Saturday as rest day for the workers.		

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	The terms and condition of the workers Employment Contract was copied and paste from their Company copy not as per KULIM' sample of Employment Contract that has all TOR stated.
<b>Corrective Actions:</b>	KULIM has conducted Contractors' engagement for all Operating Units on 15 October 2020. Estate to brief relevant Contractors on Employment Contract Guidelines communicated on 15 October 2020 by Plantation Div. Estate will assign PIC to in-charge of monitoring all matters pertaining to Contract' Workers from the list of worker assigned to the estate, employment letter, work permit and the payments that involved this group.
<b>Assessment Conclusion:</b>	<p>The contractor has revised the employment contract for his workers to include the notice period and revised the rest day to Saturday and job title as harvester. Besides, the clause for the levy payment was eliminated from the contract. Sampled of the employment contracts as below:</p> <ul style="list-style-type: none"> <li>i. Passport No.: B9965021</li> <li>ii. Passport No.: C3814674</li> <li>iii. Passport No.: B5356944</li> </ul> <p>Besides, a meeting with contractors on workers' wages was conducted on 15/10/2020. Seen the meeting materials and attendance list of the meeting. Responsibilities of contractors, Employment Act 1955 and Addendum Contract Agreements were briefed during the meeting. In additional, Senior Manager of Sungai Papan Estate has appointed Assistant Manager as a person in charge to monitor matters pertaining contract workers and appointment letter dated 01/11/2020 was sighted. Roles and responsibilities of the person in charge was outlined in the appointment letter.</p>
<b>ASA2_3 verification</b>	Sample of contractor's workers under Agro Sakthi Enterprise were checked for the employment details (employment contract, palyslip etc). None of the previous issues were found based on the employment details checked. Thus, the previous major NC is remained closed.

Non-conformity			
<b>NCR Ref #</b>	1968123-202010-N1	<b>Date Issued</b>	22/10/2020
<b>Due Date</b>	ASA2_3	<b>Date of nonconformity Closure</b>	Not effectively closed and upgraded to major NC
<b>Clause &amp; Category (Critical / Minor)</b>	Minor (2.2.2)		
<b>Statement of Nonconformity:</b>	The contractors engaged by the company were not able to demonstrate the compliance of legal requirements as stated in the agreement.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	<b>Sungai Papan Estate:</b> a) Sampled the payslips for contractor's workers found that they worked on paid		

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	<p>public holiday without paid twice the ordinary rate per piece as verified through the Workers Attendance Card by the contractor as below:</p> <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>I/C No.:</th> <th>Work on Public Holiday</th> </tr> </thead> <tbody> <tr> <td>690316-01-52XX</td> <td>21/08/2020</td> </tr> <tr> <td>731122-01-50XX</td> <td>31/08/2020</td> </tr> <tr> <td>631110-71-58XX</td> <td>16/09/2020</td> </tr> <tr> <td>990417-01-79XX</td> <td>24/09/2020</td> </tr> <tr> <td>940610-01-50XX</td> <td></td> </tr> <tr> <td>750428-01-73XX</td> <td></td> </tr> </tbody> </table> <p>a) Besides, there was only 1 day paid holiday paid to the workers above for August 2020 and September 2020 whereas there were 2 days of paid holiday on the respective months.</p> <p>PPE compliance among the outsourced FFB harvesting contractor workers at P12/B2 was not adequately complied. During the outsourced FFB harvesting field activity visit at P12/B2, noticed 2 harvesting workers wearing short pants and 4 harvesting workers not wearing safety rubber boots during at work.</p>	I/C No.:	Work on Public Holiday	690316-01-52XX	21/08/2020	731122-01-50XX	31/08/2020	631110-71-58XX	16/09/2020	990417-01-79XX	24/09/2020	940610-01-50XX		750428-01-73XX	
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631110-71-58XX	16/09/2020														
990417-01-79XX	24/09/2020														
940610-01-50XX															
750428-01-73XX															
<b>Corrections:</b>	<p>a) Arrears will be paid for the underpaid public holiday for the month of August and September.</p> <p>b) The arrears will appear in October pay (pay slip needed) slips of the said worker.</p> <p>c) Refresher training had been given to them on 23rd October 2020 about the importance of wearing the right PPE.</p> <p>d) The estate will perform checking of each contract harvester to ensure they received the PPE during muster roll call.</p>														
<b>Root Cause Analysis:</b>	<p>The contractor was not adequately brief on legal requirement by estate management.</p>														
<b>Corrective Actions:</b>	<p>a) Estate to provide and brief relevant Contractors on legal requirement on Guideline for payment of Contractors Workers communicated on 15 October 2020 by Plantation Div.</p> <p>b) Estate will assign PIC to in-charge of monitoring all matters pertaining to Contract' Workers from the list of worker assigned to the estate, employment letter, work permit and the payments that involved this group.</p> <p>c) Monthly pay slip will be given to the operating unit for monitoring purposes to ensure fully compliance of the contractor.</p> <p>d) Estate to include muster/roll-call for Contractors workers effective immediately in order to have better understanding and communication of information given by the management to comply with company OSH policy and legal requirement as per stated in contract agreement.</p> <p>Estate to establish checklist on PPE checking before workers start their daily work.</p>														
<b>Assessment Conclusion:</b>	<p>The corrective action plan is accepted. Implementation of the corrective action will be verified during the next assessment.</p>														

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<b>ASA2_3 verification</b>	Recurrence of minor NC in the same indicator and escalated to major NC based on RSPO P&C System Nov 2020.
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Non-conformity			
<b>NCR Ref #</b>	1968123-202010-N2	<b>Date Issued</b>	3.3.2
<b>Due Date</b>	ASA2_3	<b>Date of nonconformity Closure</b>	7/4/2022
<b>Clause &amp; Category (Critical / Minor)</b>	Minor (3.3.2)		
<b>Statement of Nonconformity:</b>	Mechanism to check implementation of procedures was not consistent.		
<b>Requirement Reference:</b>	A mechanism to check consistent implementation of procedures is in place.		
<b>Objective Evidence:</b>	<u>Sindora Estate:</u> 1 unit of first aid kit containing first aid materials including expired oral medications and expired eye wash solution was found kept alongside with 1 unit of latest inspected & valid content first aid kit in the school bus.		
<b>Corrections:</b>	The expired oral medications and expired eye wash solution had been removed. MA had conducted the refresher 1st aid training for the bus driver and his co-driver on 21/10/20 at 4.00pm-5.30 pm		
<b>Root Cause Analysis:</b>	MA was not following the procedure to regularly check the first aid kit as per stated in Work Instruction/ Procedure (by monthly basis)		
<b>Corrective Actions:</b>	The bus driver is a 1st aider. Monthly refresher training on Work Instruction / Procedure which includes first aid treatment, inspection, refilling and returning process will be conducted by MA involving all 1st aider on 21.10.2020. MA will establish checklist to monitor all 1st aid box submitted by 1st Aider by monthly.		
<b>Assessment Conclusion:</b>	The corrective action plan is accepted. Implementation of the corrective action will be verified during the next assessment.		
<b>ASA2_3 verification</b>	The following evidence was verified: <ol style="list-style-type: none"> <li>1) Pictorial report that shows the expired medicines have been removed from the first aid kit box.</li> <li>2) A checklist entitled "First Aid Box Inspection for Year 2021" that shows the MA is monitoring all 1st aid box submitted by 1st Aider on monthly basis. The checklist has the information about               <ul style="list-style-type: none"> <li>First aid box No.</li> <li>Person in-charge name</li> <li>First aid items &amp; quantity</li> <li>Month of checking</li> <li>Expiry dates on the items</li> </ul> </li> <li>3) Training records dated 21/10//202 that shows the bus driver and conductor have been trained on basic first aid and identifying the first aid items. The training was conducted by the Medical Assistant.</li> </ol>		

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	The evidence of correction and corrective action was found to be adequate and therefore the Minor NCR is closed on 7/4/2022. Continuous effective implementation of the corrective action shall be verified in the next assessment visit.
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<b>Opportunity for Improvement</b>	
<b>OFI#</b>	<b>Description</b>
<b>OFI 1</b>	<b>OFI Statement: N/A</b> <b>Verification / Follow-up actions: N/A</b>

**3.3.2 Summary of the Nonconformities and Status**

<b>CAR Ref.</b>	<b>Category (Critical / Minor)</b>	<b>P&amp;C Indicator</b>	<b>Issued Date</b>	<b>Status &amp; Date (Closure)</b>
1692268-201809-M1	Major	5.3.1	05/10/2018	Closed out on 02/01/2019
1692268-201809-M2	Major	5.4.2	05/10/2018	Closed out on 02/01/2019
1692268-201809-M3	Major	2.1.1	05/10/2018	Closed out on 02/01/2019
1692268-201809-N1	Minor	4.7.5	05/10/2018	Closed out on 08/10/2019
1692268-201809-N1	Minor	4.1.3	05/10/2018	Closed out on 08/10/2019
1968123-202010-M1	Critical	6.2.2	22/10/2020	Closed out on 14/01/2021
1968123-202010-N1	Minor	2.2.2	22/10/2020	Previous minor NC was not effectively closed and upgrade to major NC
1968123-202010-N2	Minor	3.3.2	22/10/2020	Closed out on 7/4/2022
2186605-202204-M1	Critical	6.7.3	7/4/2022	Closed out on 20/5/2022
2186605-202204-M2	Critical	2.2.2	7/4/2022	Closed out on 20/5/2022

### 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 Sindora Palm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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

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)
Union representative	NUPW representative	Face to face interview
Internal stakeholder	Gender committee	Face to face interview
Supplier/Contractor	Estate contractors (Agro Sakthi Enterprise)	Face to face interview
Supplier/Contractor	Sundry shop owners	Face to face interview
Internal stakeholder	Estates' foreign workers' representative	Face to face interview
Government Department	Head Master, SJK (T) Ladang Sungai Papan	Face to face interview

Stakeholders comment	
1	<b>Feedbacks:</b> Sundry shop – Reasonable rental fee charged and contracted for 1 (one) year. Frequent price monitoring was done by the management to check if there is any price hike to ensure affordable price of goods to all workers.
	<b>Audit Team verification and response:</b> No further issue
2	<b>Feedbacks:</b> NUPW Representatives – They informed that no pending issue at the time of audit. They will discuss with the management if there is any issue reported
	<b>Audit Team verification and response:</b> No further issue.
3	<b>Feedbacks:</b> Gender Committee Representatives & female workers – They informed that no sexual harassment and violence case reported since last audit. The female workers understand the function of Gender committee and aware of the complaint mechanism if there is any issues. They were treated equally without any discrimination by the management.



	<b>Audit Team verification and response:</b> The management will respect the rights of female employees and monitor if there is any case of sexual harassment and violence happen. No further issue.
<b>4</b>	<p><b>Feedbacks:</b> Foreign workers – They did not pay any recruitment fee for getting a job in Kulim (M) Berhad. They have been briefed on the terms and conditions and working environment in the plantations while they were in home country. No contract substitution occurred. Their wages are paid according to Minimum Wage Order 2020 and overtime was offered to them on voluntary basis.</p> <p><b>Audit Team verification and response:</b> Positive comments highlighted by worker’s representative. No further comment.</p>
<b>5</b>	<p><b>Feedbacks:</b> Contractor/vendor/supplier – Any project/task/job offered by Kulim is based on long term or short-term contract. For one off job, either local work order or purchase order will be issued to the supplier or vendor. No pending @ outstanding payment so far and payment was promptly done in timely manner</p> <p><b>Audit Team verification and response:</b> No negative comments raised by contractors.</p>
<b>6</b>	<p><b>Feedbacks:</b> Head Master, SJK(T) Ladang Sungai Papan – Good cooperation given to the school in terms of monetary contribution and also manpower assistance. Estate will try to assist in their capacity for any written request from school.</p> <p><b>Audit Team verification and response:</b> No further issue.</p>

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
Not applicable as the company has acquired and planted since Year 1968.					



Previous land owner / user comment – NA	
	<b>Feedbacks:</b>
	<b>Audit Team verification and response:</b>

### 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.

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**Formal Signing-off of Assessment Conclusion and Recommendation**

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Sindora POM certification unit has complied with the Malaysia National Interpretation 2019 of the RSPO P&amp;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 Sindora POM certification unit is remain certified.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name: Mohamed Hidhir Bin Zainal Abidin</b>	<b>Name: Salasah Elias</b>
<b>Company Name: BSI Services (M) Sdn Bhd</b>	<b>Company Name: Kulim Malaysia Berhad</b>
<b>Title: Lead Auditor</b>	<b>Title: Deputy General Manager</b>
<p><b>Signature:</b></p> 	<p><b>Signature:</b>  <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p> 
<b>Date: 12<sup>th</sup> July 2022</b>	<b>Date: 15<sup>th</sup> July 2022</b>

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<b>Principle 1: Behave ethically and transparently</b>			
<b>Criterion 1.1:</b> 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><b>(C)</b> Documents that are specified in the RSPO P&amp;C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Sindora Palm Oil Mill and its supply base make available documents specified in the RSPO P&amp;C to the public. These documents are either available via the Company's website <a href="http://www.kulim.com.my">http://www.kulim.com.my</a> or available at the office, or can be accessible at each operating unit:</p> <ul style="list-style-type: none"> <li>- Land titles/user rights</li> <li>- Occupational health and safety plans</li> <li>- Plans and impact assessments relating to environmental and social impacts</li> <li>- HCV documentation</li> <li>- Pollution prevention and reduction plans</li> <li>- Details of complaints and grievances</li> <li>- Continuous improvement plans</li> <li>- Public summary of certification assessment report</li> <li>- Human Rights Policy</li> <li>- Summary report of contributions to community development</li> </ul> <p>Stakeholders were also informed of the availability of these documents during stakeholder meeting for all units on 12th October 2021.</p>	Complied
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	The information is provided in either English or Bahasa Malaysia, or both. This was evidenced from the documents itself, and also during stakeholder	Complied

	- Minor compliance -	meeting held on 12th October 2021 attended by relevant stakeholders. The briefing was conducted in Bahasa Malaysia by the Environmental Officer, Kulim (Malaysia) Sdn Bhd	
1.1.3	<b>(C)</b> Records of requests for information and responses are maintained. - Critical (Major) compliance -	The information is provided in either English or Bahasa Malaysia, or both. This was evidenced from the documents itself, and also during stakeholder meeting held on 12 <sup>th</sup> October 2021.	Complied
1.1.4	<b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -	Kulim (M) Berhad continuous to implement the SOP entitled, Communication and Consultation Procedure, SQD/SMS/1.1, issue:1 ,rev: 0 dated 1 <sup>st</sup> August 2020.	Complied
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	Current stakeholder lists for Sindora POM complex were sighted. This list contains all relevant stakeholders and details of their nominated representatives. These stakeholders include suppliers, contractors, service providers, transporters, list of CPO and PK buyers, government agencies such as Dept of Safety and Health, Indonesian Consulate, Labour Department, surrounding villages such nearby schools, clinics, etc.	Complied
<b>Criterion 1.2:</b> 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 -	Kulim (Malaysia) Berhad has developed an Ethics Policy signed by the Executive Director on 1 May 2018. Additionally, there is also the No Gift and Entertainment Policy also signed by its Executive Director on 1 May 2018. A review of the stakeholder meeting minutes confirmed that these Policies were communicated to all external stakeholders during stakeholder meetings.  An addendum to contractors' letter of acceptance also included a provision which requires the contractor to comply with all of Kulim's relevant business policies, where failure to comply may result in termination of the contract. Sighted were the contract Addendum signed by Semai Setia Transport, SBK Logostic Sdn Bhd and Selama (Masai) Sdn Bhd. During stakeholder	Complied

		<p>consultations held with auditors, the transporters, contractors and service providers also confirmed their awareness, compliance and implementation of the Policies.</p> <p>The Ethics Policy is also imposed on recruitment agents. Sighted was the contract dated 13 February 2020 for Indonesian manpower supply between Kulim (Malaysia) Berhad and PT Hamparan Karya Insani. This contract contains the contractor's undertaking that it complies with all applicable laws and codes relating to anti-bribery, fraud and corruption, and undertakes not to offer or accept bribe or any improper advantage from anyone in Kulim (Malaysia) Berhad.</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>The system in place to monitor compliance and implementation of the No Gift and Entertainment Policy, Ethics Policy and overall business practice include:</p> <ul style="list-style-type: none"> <li>a. Anti-Bribery Management System audit at Sindora POM (27/10/20), Sindora Estate (25/10/20) and Sg Papan Estate (28/10/20)</li> <li>b. Contracts Administration Guidelines &amp; Procedures for Kulim Malaysia Bhd (Head Office/Estates/Mill) updated August 2019. This guideline imposes a limit on the value of transaction for each management level;</li> <li>c. Integrity ethics declaration signed by all levels of employees (management, workers).</li> <li>d. Conflict of Interest Declaration forms signed by all levels of employees.</li> </ul>	Complied
<b>Principle 2: Operate legally and respect rights</b>			
<b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p><b>(C)</b> The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>Sindora POM Certification Unit is committed to comply with all applicable local, national and ratified international laws and regulations. Licences and permits checked as per the following:</p>	Complied

		<p><u>Sindora POM</u>  Salary deduction approval from Labour Department verified as per the following:</p> <ol style="list-style-type: none"> <li>1) Water and electricity deduction, ref: TK(NJ) U-23 dated 23/12/2008.</li> <li>2) Salary deduction approval from Labour Department ref: TK (NJ) U – 23 dated 31 March 2019 for <i>Pembayaran Skim Khairat Keluarga Perbadanan Johor sebanyak RM5.00 sebulan dan bayaran premium mengikut pakej tidak melebihi RM37.50.</i></li> <li>3) MPOB license, #500263204000, valid until 30/06/2022</li> <li>4) DOE license, #004718, valid until 30/06/2022</li> <li>5) EC Private Installation permit, #2020/02441, valid until 05/10/2021</li> <li>6) Permit to store diesel, #KLU000002, valid until 26/01/2022</li> <li>7) Permit for working more than overtime regulated limit, #BHG.PU/9/134 Jld 35 (16), valid until 31/12/2021</li> <li>8) Permit to deduct wages, #JTK/KG/10103/04292, approval date 24/11/2015 – no expiry date</li> <li>9) Weighbridge calibration, #JKL-ATK 110780 &amp; #JKL-ATK 008755, valid until 28/04/2022 &amp; 02/09/2022 respectively</li> <li>10) CF Boiler, PMD-JH/21 138744, valid until 24/06/2022</li> <li>11) CF Air receiver tank, #PMT-JH/21 138754, 24/06/2022</li> <li>12) CF Back pressure receiver, #PMT-JH/21 137611, valid until 24/06/2022</li> <li>13) CF Shell length air receiver, #PMT-JH/21 138750, valid until 24/06/2022</li> <li>14) CF Air compressor, #PMT-JH/21 138751, valid until 24/06/2022</li> <li>15) CF Sterilisers, #PMT-JH/21 138752/3/5, valid until 24/06/2022</li> </ol>	
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		<p><u>Sindora estate</u></p> <p>1) Salary deduction approval from Labour Department, ref (1) dlm. JTK/KG/1010305035 dated 24/11/2014 for <i>surau</i>, SAJ Holdings, Tenaga Nasional Berhad, MAA Takaful Berhad, Great Eastern Life Assurance (M) Bhd, National Union Of Plantation Workers (NUPW), Kasih Rakyat (M) Sdn Bhd, Zurich Insurance Malaysia Berhad, Lembaga Tabung Haji, MAAKL Mutual Berhad, AIA international Insurance dan Amanah Saham Berhad.</p> <p>2) Salary deduction approval from Labour Department ref: TK (NJ) U – 23 dated 31 March 2019 for <i>Pembayaran Skim Khairat Keluarga Perbadanan Johor sebanyak RM5.00 sebulan dan bayaran premium mengikut pakej tidak melebihi RM37.50.</i></p> <p>3) MPOB License, #501863602000, valid until 31/03/2022</p> <p>4) Air compressor CF, #PMT-JH/20 129319, valid until 29/03/2022</p> <p>5) Permit to store diesel, #J002085, valid until 23/04/2023</p> <p>6) Miscellaneous permits to deduct workers' wages from Labour Department – no expiry date</p> <p>7) CF labour quarters, #K.16/2009, approval date 01/07/2010</p> <p><u>Sg Papan Estate</u></p> <p>1) Salary deduction approval from Labour Department ref: TK (NJ) U – 21 dated 31 March 2019 for <i>Pembayaran Skim Khairat Keluarga Perbadanan Johor sebanyak RM5.00 sebulan dan bayaran premium mengikut pakej tidak melebihi RM37.50</i></p> <p>2) MPOB license, #570243002000, valid until 28/02/2022</p> <p>3) Permit to store diesel, #J 001289, valid until 21/02/2022</p> <p>4) Medical Assistant license, #KKM 19709, valid until 31/12/2021</p>	
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		<p>5) Miscellaneous permits to deduct workers' wages from Labour Department – no expiry date</p> <p><u>REM Estate</u></p> <p>1) Salary deduction approval from Labour Department ref: PP3/29/110/2004 (Surau and temple deduction) effective from 10/4/2021</p> <p>2) Salary deduction approval from Labour Department ref: PP3/29/108/2004 (TNB/electric bill deduction)</p> <p>3) Salary deduction approval from Labour Department ref: TK (NJ) U – 21 dated 31 March 2019 for <i>Pembayaran Skim Khairat Keluarga Perbadanan Johor sebanyak RM5.00 sebulan dan bayaran premium mengikut pakej tidak melebihi RM37.50</i></p> <p>4) MPOB license, #501259002000, valid until 31/03/2022</p> <p>5) Permit to store diesel (REM Div.), #KPDN KK.J.KTG/PERMIT0040(PD), valid until 13/07/2022</p> <p>6) Permit to store diesel (Pasak Div.), #KPDN KK.J.KTG/PERMIT0038(PD), valid until 13/07/2022</p> <p>7) Air compressor CF, #JH PMT 17786, valid until 29/03/2022</p> <p>8) Miscellaneous permits to deduct workers' wages from Labour Department – no expiry date</p> <p><u>Basir Ismail Estate</u></p> <p>1. MPOB License, #501258102000, valid until 31/03/2022</p> <p>2. Permit to store diesel, #KPDNKK.J.KTG/PERMIT 0153 (PD), valid until 29/12/2022.</p> <p>3. Air Compressor CF, #PMT-JH/19 80375 valid until 29/03/2022.</p>	
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		<p>4. Akta Levi Luar Biasa 1998, #J31-20080000091, #JB(101)009/20/BS/01/91 by Jabatan Kastam Diraja Malaysia dated 07/08/2008</p> <p>5. Oil Palm Nursery, #620410011000, valid until 31/08/2022</p> <p>6. Weighbridge licence, #B1550909, valid until 07/12/2022</p> <p><u>Ulu Tiram Estate</u></p> <p>1. MPOB License, #501257302000, valid until 31/03/2022</p> <p>2. Permit to store diesel, #KPDNKK.J-JB/26/5A/11/811 (P/D) (P13), valid until 09/10/2024.</p> <p>3. Air Compressor CF, #JH PMT 2283, valid until 29/03/2022.</p> <p>4. Akta Levi Luar Biasa 1998, #J31-20080000091, #J31-2008000001891 by Jabatan Kastam Diraja Malaysia dated 12/08/2008</p>	
<p>2.1.2</p>	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>Sindora POM certification unit continued to implement and maintain their established documented system for identifying, accessing, tracking updates and monitoring of compliance with the legal requirements that are applicable to the CU's operation.</p> <p>Each office of the operating unit (mill and estate) has its own legal requirements register (LRR) and were being evaluated individually from time to time for compliance mainly through internal audit.</p> <p>Among the applicable legal laws registered are EQA, OSHA, Factory &amp; Machinery Act, Employment Act, Workers' Minimum Standard of Housing and Amenities Act, Minimum Wages order 2020 to name a few. Other related legal for COVID19 pandemic under Prevention and Control of Infectious Diseases (Measure Within the Infected Local Areas) Regulation 2020 was also has been identified.</p>	<p>Complied</p>

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		<p>Tracking system available to identify changes in the relevant regulations through head office, sustainability team, website information and the information are communicated from the Head Office. Kulim (Malaysia) Berhad have centralised system for tracking any changes in the law.</p> <p>The tracking law person in-charge is Ms Normaliza Mohd Taib who will maintain the changes in laws and updated the Legal and other requirement in Sindora Complex.</p>	
<p>2.1.3</p>	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>Whenever the land boundaries are adjacent with third party (smallholders, villages, other oil palm companies, etc.) the normal practice of sample estate to indicate the legal boundaries are through construction of trenches and parameter road. This was confirmed through the field visit REM Estate, Basir Ismail Estate and Ulu Tiram Estate. Apart from that, erection of concrete slab with GPS coordinate along the boundaries was also commonly practiced and clearly visible.</p> <p><u>Basir Ismail Estate</u></p> <p>Verified boundary peg at P03/01 (No.50) and P13/02 (No. 54), Neighbouring to Johor River and Kg Ayer Putih. Other sample was at boundary peg at P04R (No.53), Neighbouring to Pocket Jungle and Johor River. Verified that there is no planting beyond these legal or authorised boundaries.</p> <p><u>Ulu Tiram Estate</u></p> <p>Verified boundary peg at P12/1 (No.48) Neighbouring to Government road. Verified that there is no planting beyond these legal or authorised boundaries.</p> <p><u>REM Estate</u></p> <p>Verified boundary peg at P17/4 (No.12 &amp; No.13) Neighbouring to Felda Pasak. Verified that there is no planting beyond these legal or authorised boundaries.</p> <p><u>Sg. Papan Estate</u></p>	<p>Complied</p>

		Verified boundary peg at P16/2 (No.91) Neighbouring to Pocket Jungle. Other than that at P16/1 (No.92). Verified that there is no planting beyond these legal or authorised boundaries.	
<b>Criterion 2.2:</b> 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 -	List of contracted parties maintained under stakeholder list for each operating units. The contractors included for activities such as transportation (FFB, CPO and PK), road maintenance, harvesting and others.	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 -	All contracts (short and long term), contain specific clauses on meeting applicable legal requirements were spelled out in the contract. <ul style="list-style-type: none"> <li>- Contract ref: MPSB/SINPOM 2/68/2021, contractor: Wil-Key International Sdn Bhd (Repair of Biogas Reactor Pond) at Sindora POM, Kluang, Johor.</li> <li>- Contract ref: MPSB/LSA 3/2017 – VO:1/2021, Agro-Sakthi Enterprise (loading and transporting FFB in filed P10, P14, P15A, P15B at Ladang Sindora, Kluang Johor)</li> <li>- Contract ref: KMB/REM 4/2017 – VO:06/2020, Pengangkutan Sempurna Sdn Bhd (loading and transporting FFB from ramp to Sindora/Sedenak POM, Kota Tinggi, Johor)</li> <li>- Contract ref: MPSB/LSPN 3/2018 – VO:05/2021, Sg Rezeki Sdn Bhd (Harvesting of FFB in P03 (246.41 ha), P04 (197.81 ha) and P10 (203.24 ha) by using scissor lift at Sg Papan Estate.</li> </ul> Evidence of due diligence is demonstrated via declaration between contactor based on letter for Kulim (M) Berhad’s General Manager, Procurement and Contract Department. Each addendum contract signed attached with the employee data and employment practice checklist for self-declaration for compliance. For example addendum contract signed and self-declared form for harvesting contractor, Agro-Sakthi Enterprise, contract ref.: : MPSB/LSA 3/2017 – 1/2021 (loading and transporting FFB in filed P10, P14, P15A, P15B	Non-compliance

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		<p>at Ladang Sindora, Kluang Johor). Addendum contract signed dated 19/1/21 available for verification.</p> <p><u>Extension of scope</u></p> <p>All contracts (short and long term), contain specific clauses on meeting applicable legal requirements were spelled out in the contract.</p> <p><u>Basir Ismail Estate</u></p> <ul style="list-style-type: none"> <li>- Contract ref: KMB/LBI 3/91/2021 – Temasek Estate Contractor Sdn Bhd (Replanting of P21 (322.21ha) at Ladang Basir Ismail, Sungai Tiram Johor.</li> <li>- Contract ref: KMB/LBI 2/81/2019, Chahyono Contractor (Maintenance of 68,794 m2 probase road system at Ladang Basir Ismail, Sungai Tiram, Johor.</li> <li>- Contract ref: KMB/LBI 1/2016, Sri Thilakkumar Enterprise, Harvesting of FFB in P11 (239.22 ha) and P12 (252.28 ha) using scissor lifts at Ladang Basir Ismail, Sungai Tiram, Johor.</li> </ul> <p>At Sungai Papan Estate, four out of six FFB trucks (i.e. reg. no.: MAR 9939, JPQ 4249, MAF 9982, BJJ 4713) own by the FFB transport contractor (Perusahaan Insan Permai) have no valid PUSPAKOM certificates at the point of audit inspection at the FFB ramp. Thus, a critical NC was issued.</p>	
2.2.3	<p>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.</p> <p>- Minor compliance -</p>	<p>All contracts included with the addendums;</p> <p>“The contractors represent and warrant that the Contractor shall comply with applicable labour and employment laws regarding; and prohibit any form of child labour, forced and trafficked labour. Any eligible your labour will be employed only in accordance with Children and Young Person (Employment) 1966.”</p>	Complied

Addendum agreement signed on 19/1/20 for Agro-Sakthi Enterprise and 9/9/2021 for Wil-Key International Sdn Bhd.

**Criterion 2.3:** All FFB supplies from outside the unit of certification are from legal sources.

2.3.1	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>• Information on geo-location of FFB origins</li> <li>• Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>• One or more supporting documents for claims</li> <li>• Valid MPOB license</li> </ul> <p>- Critical (Major) compliance -</p>	<p>Sindora POM processed own estate crops and FFB sourced from third party trader suppliers. The mill ensures all FFB supplies from all directly sourced FFB by obtaining the valid MPOB license from the FFB suppliers as stipulated in the Marketing Guideline Procedure Fresh Fruit Bunch (FFB) Supply, Doc. No. KMB/MKTG/MGP-03, Rev. 0, Date: 01/09/2020. Sampled following MPOB license for the FFB directly sourced suppliers:</p> <p>a) Sindora Berhad (Reg. No. 13418-K) – Ladang Sindora Selatan, MPOB license No. 501863602000 valid until 30/11/2021</p> <p>b) Kulim (Malaysia) Berhad (Reg. No. 501259002000) – Ladang R.E.M, MPOB license No. 501259002000 valid until 31/03/2022</p> <p>c) Mahamurni Plantations Sdn Bhd (Reg. No. 38290-V) – Sungai Papan, MPOB license No. 570243002000 valid until 28/02/2022 All directly sourced FFB are from Kulim (M) Berhad’s own estates. Information of each estates detailed out under table 4 &amp; 5 of the report.</p>	Complied
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>Sindora POM processed own estate crops and FFB sourced from third party trader suppliers. The mill ensures all FFB supplies from outside the unit of certification are from legal sources. Method to ensure this compliance is by obtaining the valid MPOB license from the FFB trader suppliers as stipulated in the Marketing Guideline Procedure Fresh Fruit Bunch (FFB) Supply, Doc. No. KMB/MKTG/MGP-03, Rev. 0, Date: 1/09/2020. Sampled following MPOB license for the FFB trader suppliers:</p> <p>a) Eng Lee Heng Trading Sdn Bhd (Reg. No. 790072-D), MPOB license No. 538454015000 valid until 31/3/2022.</p> <p>b) Perniagaan MD. Sangidi (Reg. No. JM 0356901-V), MPOB license No. 5064620150000 valid until 31/03/2022.</p>	Not Applicable

<b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b>																																																			
<b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.																																																			
3.1.1	<p><b>(C)</b> 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>The business plan for the mill is presented in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains production CPO, OER, and KER, operational &amp; maintenance cost and CAPEX.</p> <p>The business or management plan for the estates were presented in the form of annual budget with 5 years projection. The annual budget contains the crop projection and the finance allocation for field operation &amp; administrations and CAPEX.</p> <p>The management has their monthly progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.</p>	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>The estates have their replanting programme which have the projection until five years. The hectarage to be replanted based on the programme is as follows:</p> <table border="1"> <thead> <tr> <th rowspan="2">Estates</th> <th colspan="6">Year</th> </tr> <tr> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>Sindora</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>REM</td> <td>0</td> <td>0</td> <td>116.91</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Sungai Papan</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Basir Ismail</td> <td>0</td> <td>171.28</td> <td>0</td> <td>114.99</td> <td>0</td> <td>0</td> </tr> <tr> <td>Ulu Tiram</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> </tbody> </table>	Estates	Year						2021	2022	2023	2024	2025	2026	Sindora	0	0	0	0	0	0	REM	0	0	116.91	0	0	0	Sungai Papan	0	0	0	0	0	0	Basir Ismail	0	171.28	0	114.99	0	0	Ulu Tiram	0	0	0	0	0	0	Complied
Estates	Year																																																		
	2021	2022	2023	2024	2025	2026																																													
Sindora	0	0	0	0	0	0																																													
REM	0	0	116.91	0	0	0																																													
Sungai Papan	0	0	0	0	0	0																																													
Basir Ismail	0	171.28	0	114.99	0	0																																													
Ulu Tiram	0	0	0	0	0	0																																													
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>The latest management review meetings were carried out on 17/09/2021 (Sindora POM), 20/09/2021 (Sindora Estate), 09/08/2021 (REM Estate), 09/09/2021 (Sungai Papan Estate), 08/11/2021 (Basir Ismail Estate) and 25/11/2021 (Ulu Tiram Estate). They were chaired by the respective</p>	Complied																																																

		<p>operating unit's managers and attended by key personnel. Among the agenda discussed were:</p> <ul style="list-style-type: none"> <li>- Follow-up action from previous management review</li> <li>- Process conformance &amp; product conformity</li> <li>- Customer feedback</li> <li>- Internal audit</li> <li>- External audit</li> <li>- Changes that could affect management system</li> <li>- Recommendation for improvement</li> <li>- Complaints and grievances</li> <li>- Other matters</li> </ul>	
<p><b>Criterion 3.2:</b> 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><b>(C)</b> 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>Continuous Improvement Plans to address the Social, Environmental, Productivity and OSH aspects were available in Sindora POM and its supply bases for verification. Generally, the aspects covered in the CIP are occupational safety, environment and social. Among the information available in the CIP is objectives, action to be taken, timeframe and responsible persons in-charge.</p>	Complied
3.2.2	<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><b>PROCEDURAL NOTE:</b>            The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.            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>RSPO metric template version 2.1 is used for the reporting of Sindora POM certification unit's metrics (economic, social and environment). Data reporting period is Jan to Dec 2020 for (social and environment metrics) and economic metrics from Aug 2020 – Jul 2021 (counting back from audit month). Based on verification with input data, no discrepancies of data reported in the metrics for the period under review for all the operating units.</p>	Complied

	- Minor Compliance -		
<b>Criterion 3.3:</b> Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>The Mill operations are guided by the following documents:</p> <ul style="list-style-type: none"> <li>- Quality Manual (PCPOM/QM) document no PCPOM/QM.4.0</li> <li>- Standards Operating Procedure (PCPOM/SOP)</li> </ul> <p>Kulim (M) Berhad Agricultural Manual has established covers Replanting, roads drains Bridges culverts and fences, construction of estate building, manuring including POME and Bio compost, harvesting, pruning and ablation, soil conservation, justification of chemical use, weed management, integrated pest management and plant diseases. There are 19 SOPs and 18 WI's covering all aspects of oil palm management including composting site operation.</p>	Complied
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>Apart from daily routine supervision, the sampled management units have their mechanism to monitor the implementation of their procedures, among others through Internal Audit, Mill Inspector visit, Estate Inspector visit, and workplace inspection by Safety Officer.</p>	Complied
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>Records of monitoring with regards to EHS and RSPO implementation are maintained and available for verification. Apart from routine field supervision, among other mechanisms used to monitor the implementation of the manual are as follows:</p> <ul style="list-style-type: none"> <li>• Plantation Inspectorate visit</li> <li>• Visit from Audit, Risk Management &amp; Compliance Dept.</li> <li>• Agronomist visit</li> </ul>	Complied
<b>Criterion 3.4:</b> 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.			



<p>3.4.1</p>	<p><b>(C)</b> 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 -</p>	<p>There are no new plantings or new operations within Sindora Mill and its supply base. Nevertheless, each unit has its own Social Impact Assessments done which have been prepared internally by the Company's Sustainable Palm Oil team. Details of the Social Impact Assessment are contained in Indicator 3.4.2 below.</p> <p>Environmental aspects and impacts analysis were done through utilization of Environmental Risk Assessment form [e.g. for Sindora Estate, form no.: KULIM-LS-2021]. The last review of the analysis was done in August 2021. The evaluation form has the information about aspect/impact identified, risk assessment and risk control.</p>	<p>Complied</p>
<p>3.4.2</p>	<p>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 -</p>	<p>Social Impact Assessment (SIA) as well as the Social Management Plans for the Sindora POM and its supply base are available. The SIA has been prepared with participation of affected stakeholders via interviews and feedback received, NUPW and WOW meeting minutes. Latest SIA register dated 15/9/21 was sighted for all operating units.</p> <p>Each the Social Management Plan has identified the positive and negative issues for the unit, and recommendations for social improvement, action, person in charge and monitoring.</p> <p>Potentially negative impact identified includes:</p> <p>Sindora POM: Delay in the process of VISA/permit renewal.</p> <p>Sindora Estate: "Sample on the payslips for contractor's Lai Brothers Development workers found that payment made for SOCSO Employment injury Scheme (EIS) contribution for workers is not according to Jadual Caruman Oleh Majikan – Lampiran 2 as below:</p> <p>i- Mohd Zam Zam Arsat – (810310-01-5481) for month of June 2021 (Total income RM 3,230.12 – Employers contribution (RM 34.90 instead of RM 56.85) &amp; Employees contribution (RM 6.20 instead of RM 16.25)</p>	<p>Complied</p>

		<p>ii- Muhammad Rizzuan Manan – (990721-08-7317) for month of June 2021 (Total income RM 1,708.20 – Employers contribution (RM 34.90 instead of RM 30.65) &amp; Employees contribution (RM 6.20 instead of RM 8.75)) Thus, compliance with the Employees’ Social Security Act 1969 was not effectively demonstrated. ”</p> <p><u>Basir Ismail Estate – 7/9/2021</u> <u>Negative issue</u> Monitoring of price list of groceries – 3 months once, comparing price difference with other grocery store. Action – continuous monitoring Late renewal of worker’s permit/VISA – renewal process 3 month before expiry.</p> <p><u>Ulu Tiram Estate (15/10/2021)</u> <u>Negative issue</u> Increase price of goods at sundry store – Frequent monitoring, comparing price difference with other grocery store. Action – continuous monitoring Late renewal of worker’s permit/VISA – renewal process 3 month before expiry. PIC social for compliance grievance – appointment of person in charge. REM Estate – Monitoring of the price list of groceries given by the shopkeeper, should be done periodically (at least once every 3 months or in case there is a complaint from employees). These monitoring activities need to be recorded and documented. Action plan for the above negative issues has been detailed out in the management plan with related action and person in-charge for continuous monitoring Mitigation measures are registered in “Continuous Improvement Plan Monitoring Sheet”. The objective is to mitigate and monitor the identified</p>	
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		significant activities that give impacts on environment. Specific persons in-charged have been identified to do the monitoring to ensure the plan is effectively implemented	
3.4.3	<p><b>(C)</b> 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>Evidence is available that the Management Action Plans are being updated on a yearly basis. Based on minutes of meetings, evidence is available that the reviews were done in a participatory way as evidenced from minutes of discussions, written feedbacks/responses from stakeholders.</p> <p>The environmental management plan for the mill was developed and documented based on the environmental impact assessment (EPA-FM-1). Whereas for the estates, the environmental management plan was documented in a form #XX-EMP 01 (where XX is the estate's code). The monitoring of implementation was reported, and status of progress was then updated.</p>	Complied
<b>Criterion 3.5:</b> A system for managing human resources is in place.			
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>Reviewed and verified during the audit were the following SOPs:</p> <ul style="list-style-type: none"> <li>a. Recruitment of New Foreign Workers Rev. No. 1 Issue No. 1 dated 1 Jan 2019. It was observed that this SOP does not contain procedures related to termination, promotion and retirement of foreign workers. Nevertheless, it was noted that termination is clearly stipulated under workers' employment contracts. And although the procedure for promotion is not available in the SOP for foreign worker, evidence is available that this is being practiced at the Mill via letter dated 29 December 2019 issued to Worker No. 637128 which confirmed his change from General Worker to Kernel Plant operator.</li> <li>b. Recruitment of Local Workers for Operating Units Rev No. 00 Issue No. 01 dated 1 October 2020. This SOP contains procedures for recruitment, promotion, retirement, and termination.</li> </ul>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p>	<p>Sindora POM certification unit has published advertisement of job vacancy and displayed in the food stalls in nearby town and circulated the job vacancy</p>	Complied

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	<p>- Minor Compliance -</p>	<p>in the social media to the internal staffs and workers. The estates have made a public interview session in neighbouring Felda community to recruit the local communities. Besides, KULIM has published job vacancy in Facebook page of KULIM as verified through interviewed with the recently joined staff in Sindora Estate. Sindora POM and Sindora Estate has recruited local workers recently and seen the records of recruitment such as application form, identification card, medical examination records and offer letter.</p> <p><u>Sg Papan Estate</u>          New workers (induction – 15/3/22), general workers</p>									
<p><b>Criterion 3.6:</b> An occupational health and safety (H&amp;S) plan is documented, effectively communicated and implemented.</p>											
<p>3.6.1</p>	<p><b>(C)</b> All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The mill and estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following:</p> <ul style="list-style-type: none"> <li>- Change in work process</li> <li>- Revision/changes in legislative requirement</li> <li>- Occurrence of accidents</li> </ul> <p>Appropriate risk control measures were determined and implemented for the respective activities and operation</p> <p>CHRA was last conducted at the sampled management unit as follows:</p> <table border="1" data-bbox="1041 1141 1937 1364"> <thead> <tr> <th>Estates/Mill</th> <th>Date of assessment</th> <th>Report ref. No.</th> <th>Assessor Reg. No.</th> </tr> </thead> <tbody> <tr> <td>Basir Ismail</td> <td>26/02/2018 &amp; 02/2021 (supplementary)</td> <td>JKKP HQ/03/ASS/00/154-2018/061 &amp;</td> <td>HQ/03/ASS/00/154</td> </tr> </tbody> </table>	Estates/Mill	Date of assessment	Report ref. No.	Assessor Reg. No.	Basir Ismail	26/02/2018 & 02/2021 (supplementary)	JKKP HQ/03/ASS/00/154-2018/061 &	HQ/03/ASS/00/154	<p>Complied</p>
Estates/Mill	Date of assessment	Report ref. No.	Assessor Reg. No.								
Basir Ismail	26/02/2018 & 02/2021 (supplementary)	JKKP HQ/03/ASS/00/154-2018/061 &	HQ/03/ASS/00/154								

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				JKKP HQ/03/ASS/00/154-2021/002 (supplementary)		
		REM	26/02/2018	HQ/03/ASS/00/154-2018/029	HQ/03/ASS/00/154	
		Sg Papan	27/2-13/8/2018	HQ/03/ASS/00/154-2018/030	HQ/03/ASS/00/154	
		Sindora	26/3-13/8/2018 & 22/12/2020-31/1/2021 (supplementary)	HQ/03/ASS/00/154-2018/034 & JKKP HQ/03/ASS/00/154-2021/020 (supplementary)	HQ/03/ASS/00/154	
		Sindora POM	26/3-13/8/2018	HQ/03/ASS/00/154-2018/056	HQ/03/ASS/00/154	
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Kulim (Malaysia) Berhad has maintained an approved Health and Safety Policy dated 01/10/2021 that is displayed prominently on notice boards in English/Bahasa Malaysia. It was signed by the Kulim (Malaysia) Bhd’s Managing Director. Safety &amp; Health Management Plan was available accordingly for year 2022. Apart from daily routine supervision, among the methods to monitor the effectiveness of the H&amp;S plan are SHO Workplace Inspection, internal audits, establishment of CHRA Improvement Plan, safety committee meetings, medical surveillance, and audiometric test. Records of monitoring were made available for verification by the sampled management units.</p>				Complied
<p><b>Criterion 3.7:</b> All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>						

<p>3.7.1</p>	<p><b>(C)</b> 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&amp;C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The annual training program has been established and covered all aspects of the RSPO elements. There were also additional subjects including the estate operating procedures, parameters, vehicles maintenance etc. The training program also specified the target group of employees to be trained under the allocated subjects. The program mainly covers both requirement of the estates and mill in the CU. The subjects for the training are issued and assisted by the SQD personnel.</p> <p>The Certification Unit has established the Sustainable Management System; Training and Competency; Doc Number: SQD/SMS/3.7; Issue No: 01; Date: 01 August 2020. The Annual Training Program 2021 was established that covers mainly Health and Safety but extends to include all aspects of RSPO P&amp;C and Supply Chain Certification Standard (SCCS).</p> <p>Means implemented by Kulim Plantation to assess understanding of participants include:</p> <ul style="list-style-type: none"> <li>• Participants completing post-training evaluation/feedback form and give suggestions;</li> <li>• Learners engagement such as interactive quizzes;</li> <li>• Knowledge acquisition and behavioural application rated by immediate supervisor at workplace post training attended.</li> </ul>	<p>Complied</p>																						
<p>3.7.2</p>	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Records of training were maintained by the mill and estates and made available for verification. Among the records verified are as follows:</p> <table border="1" data-bbox="1039 1155 1821 1369"> <thead> <tr> <th rowspan="2">No</th> <th rowspan="2">Trainings</th> <th colspan="4">Date</th> </tr> <tr> <th>SPOM</th> <th>Sindora</th> <th>REM</th> <th>Sg Papan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Manuring-manual</td> <td></td> <td>10/06/21</td> <td>15/09/20</td> <td>02/03/21</td> </tr> <tr> <td>2</td> <td>Harvesting</td> <td></td> <td>08/07/21</td> <td>10/02/21</td> <td>18/02/21</td> </tr> </tbody> </table>	No	Trainings	Date				SPOM	Sindora	REM	Sg Papan	1	Manuring-manual		10/06/21	15/09/20	02/03/21	2	Harvesting		08/07/21	10/02/21	18/02/21	<p>Complied</p>
No	Trainings	Date																							
		SPOM	Sindora	REM	Sg Papan																				
1	Manuring-manual		10/06/21	15/09/20	02/03/21																				
2	Harvesting		08/07/21	10/02/21	18/02/21																				

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		3	Spraying		02/07/21	22/02/21	15/07/21		
		4	Chemical handling	01/02/21	18/03/21	13/03/20	06/06/21		
		5	Emergency response plan	03/10/21	18/10/21	11/10/20	18/08/21		
		6	Fire drill	03/10/21	18/10/21	11/10/20	18/08/21		
		7	First aid	11/03/21	11/03/21	14/10/20	05/02/21		
		8	Tractor/lorry safe driving	-	15/10/21	07/20/20	04/03/21		
		9	Triple rinsing	-	09/03/21	04/01/21	06/06/21		
		10	PPE usage	29/09/21	11/07/21	10/09/20	19/04/21		
		11	Rat baiting		04/07/21	06/10/20	08/02/21		
		12	FFB loading/Ramp		14/07/21	15/07/21	11/08/21		
		13	QMS/EMS/RS PO/MSPO refresher	03/10/21					
		14	SW management	21/02/21	17/09/21	18/08/21	20/05/21		
		15	Confined space	04/10/21					
		16	Spill containment	02/07/21					
		17	Safety training	13/10/21					
		18	Bund rupture	24/01/21					

		19	Supply chain	27/09/21					
Basir Ismail Estate									
Training								Date	
PPE Usage Training								10/10/2021	
Harvesting Training								06/10/2021	
Spraying – HCV & Buffer Zone Training								02/08/2021	
Spill Containment Training								15/11/2021	
Scheduled Waste Training								22/09/2021	
Triple Rinsing Training								31/10/2021	
Manuring Training								12/04/2021	
Chemical handling Training								31/10/2021	
Safety Work at Diesel Tank								23/09/2021	
Rat Baiting Training								19/09/2021	
Weighbridge Training								18/08/2021	
Ulu Tiram Estate									
Training								Date	



		Harvesting Training	06/04/2021		
		Scheduled Waste Training	20/08/2021		
		Water Sampling Training	25/02/2021		
		Rat Baiting Training	03/02/2021		
		PCD Cleaning Training	25/08/2021		
		Manuring	11/03/2021		
		Chemical handling Training	08/11/2021		
		First Aid Training	21/10/2021		
		PPE Training	08/11/2021		
		ERP Training	17/10/2021		
		Fogging Training	08/10/2021		
3.7.3	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. - Minor Compliance -	Training on supply chain was last conducted by the mill on 14/02/2022. It was attended by personnel from various department such as administration, weighbridge, laboratory, and security. Record of attendance was made available for verification.			Complied
<b>Criterion 3.8: Supply chain requirement for mills</b>					
3.8.1	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	Sindora POM is deemed to be Identity Preserved (IP) where the FFB processed by the mill are sourced from plantations/estates that are certified			Complied

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	<p>against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p> <p>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>against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p> <p>3 supplying estates namely (Sg Papan, REM and Sindora estate) and inclusion of Basir Ismail and Ulu Tiram estate as part of REM estate's division.</p>	
3.8.2	<p>Mass Balance Module</p> <p>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 only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>No uncertified crop received since 31/12/21. Thus, mass balance module is no more applicable for Sindora POM</p>	Not Applicable
3.8.3	<p>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&amp;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.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. Summary of CPO and PK deliver in a year (from the last audit date) reported under table 10.</p>	Complied
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization, PalmTrace.</p> <p>The registration of PalmTrace will be carried out by the Marketing Department in HQ. Company has registered in PalmTrace system as follows:  Members ID: RSPO_PO1000001264  License valid until 22/01/2022</p>	Complied

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		Member category: Oil Mill	
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"> <li>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>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.</li> <li>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill.</li> </ul>	<p>Kulim (Malaysia) Berhad has developed Traceability Procedure (Doc. No.: SQD/SMS/1.2, Issue No. 1, Rev. No.: 05 dated 1/8/20) and RSPO Supply Chain Procedure (Doc. No.: MKD/001, Rev. 01 dated 9/10/2018). On the marketing side, Procedure title: RSPO Supply Chain; Procedure # MKD/001; Date: 9/10/2018 is referred to.</p> <p>Seen the records that included in the procedure are as below:</p> <ul style="list-style-type: none"> <li>i. Weighbridge tickets</li> <li>ii. Training records</li> <li>iii. Internal audit report</li> <li>iv. Invoice and contracts</li> <li>v. Delivery and storage records</li> <li>vi. Daily Production Report</li> </ul> <p>Training records for RSPO Supply Chain &amp; Stamping was sighted where the training was conducted on 4/2/2022 for the critical control point responsible person such as Weighbridge Operators and Security Guards. Seen the attendance list and interviewed with the attendees confirmed that they are understand the procedure.</p> <p>c) Head of each operating unit has automatically appointed as person responsible for all certification inclusive of RSPO SCCS. Responsibility of the person-in-charge has clearly stated in the appointment letter dated 22/9/2019.</p> <p>d) Kulim (Malaysia) Berhad has developed Traceability Procedure (Doc. No.: SQD/SMS/1.2, Issue No. 1, Rev. No.: 05 dated 1/8/20) and RSPO Supply Chain Procedure (Doc. No.: MKD/001, Rev. 01 dated 9/10/2018) which has covered the process of incoming of FFB and ensuring no contamination in the IP mill.</p>	Complied
3.8.6	Internal Audit	Kulim (Malaysia) Berhad has developed Internal Audit Procedure (Doc. No.: SQD/SMS/5/0, Issue No.: 1, Rev. No.: 0 dated 1/7/2018) where the	Complied

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	<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>objective is to ensure that the implementation of company's RSPO, ISCC and MSPO management system is in line with the policies, procedures and other requirements. The frequency of the internal audit to be carried out is at least once within 12 months (before expiry of the certificate). The latest internal audit was carried out on 11/7-8/8/21 by SQD team. There was 1 (one) non-conformance was raised based on Internal Audit Report. All the clauses in RSPO SCCS and RSPO Market Communications and Claims were covered during the audit.</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>When FFB delivered to the mill from the estate, the transporters presented FFB despatch report to the mill weighbridge clerk in order the FFB to be received by the mill.</p> <p>E.g. of information available in the FFB despatch report is as follows:</p> <ul style="list-style-type: none"> <li>• FFB despatch no.: DB A No. XXXX</li> <li>• Estate's name: Ladang Sindora/REM/Sungai Papan</li> <li>• Date of delivery: dd/mm/yyyy</li> <li>• Field No.: PXX/Y</li> <li>• Lorry no.</li> <li>• FFB Weight in mt</li> <li>• WB ticket: XXXXXX</li> <li>• Traceability Identification: RSPO certified FFB (RSPO 612392)</li> </ul> <p>For the third party non-certified supplier, the following examples of information is available in their Delivery Note:</p> <ul style="list-style-type: none"> <li>• FFB despatch no.: XXXXX</li> <li>• Estate's name: Eng Lee Heng Trading Sdn Bhd</li> <li>• Date of delivery: dd/mm/yyyy</li> </ul>	<p>Complied</p>

		<ul style="list-style-type: none"> <li>• Lorry no.</li> <li>• FFB Weight in mt</li> </ul>	
3.8.8	<p><b>Sales and Goods Out</b></p> <p>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"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ol>	<p>Based on verification of dispatch document of CPO and PK for the sampled contract #CPOMB MXXXX, all the required information by the standard was available in various documents such as weighbridge tickets, delivery notes, and collection order.</p>	Complied
3.8.9	<p><b>Outsourcing Activities</b></p> <ol style="list-style-type: none"> <li>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</li> </ol>	<p>The production of CPO and PK is carried out in-house in SPOM without any outsourced facility. Only the transportation of CPO is outsourced to contractors. Transportation of PK was assigned by the buyers. For CPO, contract agreements with a few contractors were verified as follows:</p>	Complied

	<p>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>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>	<p>1) Yewtan Enterprise, MPSB/CPO 1/2016 (YEW TAN), refer to LOA, MPSB/G1/6/2(2020) dated 15/06/2020. Date commencement: 01/06/2020, completion date: 31/05/2023.</p> <p>Under clause 6 on the contract:</p> <p><i>For contract operation in RSPO, ISCC and MSPO certified mills or estates, the contractor is required to comply with all RSPO, ISCC and MSPO requirements related to the execution of the contract.</i></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 all contractors used for the physical handling of CSPO is listed under the contractors list dated 25/10/2021.	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.	No change of names and contract details of transporter for the physical handling of RSPO certified oil palm products.	Complied
3.8.12	Record keeping	i) The mill has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these Sustainability Management System as follows:	Complied

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	<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>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.</p> <p>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.</p> <p>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).</p>	<ul style="list-style-type: none"> <li>- Dispatch of CPO/PK delivery order</li> <li>- Daily Production Report</li> <li>- FFB Despatch Report from supplying estate</li> <li>- Training records</li> <li>- FFB Transaction records</li> </ul> <p>ii) Traceability Procedure (Doc. No.: SQD/SMS/1.2, Issue No. 1, Rev. No.: 02 dated 28/02/2019), the records retention for all RSPO Supply Chain related records to be retained for a minimum of 5 years' period</p> <p>iii) Records of balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK available for varication. No uncertified FFB received since 31/12/2021 and Sindora POM is preparing for Identify Preserved module upgrading.</p> <p>iv) Mass balance module is no longer applicable.</p>	
3.8.13	<p><b>Extraction Rate</b></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>Conversion factor of CPO and PK production is depending on the actual OER and KER.</p>	Complied
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

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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>Sindora POM has prepared for the production identity preserved of CPO and PK since 31/12/2021. No more uncertified crop received since then. Tank preparation has started and completed with 2 available IP tank production once the arrangement of identity preserved product starts.</p>	Complied
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 PalmTrace platform is carried out by the mill when RSPO certified products are sold as certified to buyers.</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>Kulim (Malaysia) Berhad has obtained Trademark License from RSPO and the license, # 1-0080-09-100-00 which valid from 13/08/2021 – 12/08/2023, was made available for verification. The facility is aware with the requirements of the RSPO Rules on Market Communications and Claims although no trademark logo was used.</p>	Complied
<b>General corporate communications</b>			
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>Kulim (Malaysia) Berhad has stated the member's history with regard to RSPO in the company's website and annual report 2020 without the use of trademark logo.</p>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <p>a. Display its RSPO membership status</p>	<p>Kulim (Malaysia) Berhad has stated the member's history with regard to RSPO in the company's website and annual report 2020 without the use of trademark logo.</p>	Complied



	<p>b. Display the RSPO web address (www.rspo.org)</p> <p>c. State that the member supports the work of the RSPO</p> <p>d. State the member’s history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO.</p> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at www.rspo.org’ where the link must lead to the member’s profile page.</p>		
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	The company does not make any statement that may misleading to the consumers to believe that RSPO membership by itself implies that selling of RSPO-certified oil palm products by verified through the website	Complied
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.	The communication that made via website is consistent, clear and does not mislead the consumer and stakeholders as to the certified content of oil palm products in their own products.	Complied
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.	There was no RSPO corporate logo has been used verified through website, notice board, business card, shipping documentation and procurement/purchasing document.	Complied
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer. Verified the weighbridge tickets to buyer where claim of CSPO (Identity Preserved) was stamped on the tickets.	Complied

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.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that the product is CSPO (Identity Preserved) with RSPO certificate number: RSPO 612392	Complied
5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	Sindora Palm Oil Mill is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable
<b>Business to consumer communication</b>			
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.	No business to consumer communication on product specific claim made by Sindora Palm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	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.	No business to consumer communication on product specific claim made by Sindora Palm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	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.	No business to consumer communication on product specific claim made by Sindora Palm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	No business to consumer communication on product specific claim made by Sindora Palm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	No business to consumer communication on product specific claim made by Sindora Palm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	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.	No business to consumer communication on product specific claim made by Sindora Palm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	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.	No business to consumer communication on product specific claim made by Sindora Palm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use 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	No business to consumer communication on product specific claim made by Sindora Palm Oil Mill and only produce crude and unfinished product. This is not applicable for POM.	Not Applicable

	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 <a href="http://www.rsपो.org">www.rsपो.org</a> .		
<b>MODULE A – IDENTITY PRESERVED &amp; SEGREGATED SPECIFIC RULES</b>			
<b>Certified oil palm content (IP)</b>			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	Oil palm content is 100% CPO and claim as RSPO IP-certified.	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	No SG claim was made.	Not Applicable
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	Oil palm content is 100% CPO and claim as RSPO IP-certified. All infeed material (FFB) is RSPO certified.	Complied
<b>Labelling and trademark (IP)</b>			
	Members are allowed to use the RSPO label in one of the following ways: <ul style="list-style-type: none"> <li>• RSPO trademark which includes the tag 'CERTIFIED' or</li> <li>• RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</li> </ul>	As to date, no RSPO trademark used on the RSPO products. Kulim (Malaysia) Berhad has stated the member's history with regard to RSPO in the company's website and annual report 2020 without the trademark logo used.	Complied

<b>Messaging (IP)</b>			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> <li>• The oil palm products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.</li> </ul>	<p>As to date, no RSPO trademark used on the RSPO products. Kulim (Malaysia) Berhad has stated the member’s history with regard to RSPO in the company’s website and annual report 2020 without the trademark logo used.</p>	<p>Complied</p>
<b>MODULE B – MASS BALANCE SPECIFIC RULES</b>			
<b>Minimum Mass Balance content</b>			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>NA</p>	<p>Not Applicable</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,</p>	<p>NA</p>	<p>Not Applicable</p>

	the non-certified volume must be covered by equivalent volume of RSPO Credits.		
<b>Labelling and trademark (MB)</b>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• Surrounded by the text: 'Certified sustainable palm oil'.</li> <li>• 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.</li> <li>• The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'.</li> <li>• 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).</li> <li>• 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 &amp; Claims document.</li> </ul>	NA	Not Applicable
<b>Messaging (MB)</b>			
	Messaging ALLOWED in storytelling in product-related communications includes:	NA	Not Applicable

	<ul style="list-style-type: none"> <li>• [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.</li> <li>• 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.</li> </ul> <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>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> <li>• Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</li> </ul>						
<p><b>Principle 4: Respect community and human rights and deliver benefits</b></p>							
<p><b>Criterion 4.1:</b> The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>							
<p>4.1.1</p>	<p><b>(C)</b> 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>Kulim (Malaysia) Berhad has a Sustainability Policy which signed by the new Managing Director on 1<sup>st</sup> October 2020. The policy which among others, states it commitment to respect, support and protect international human rights against violence, threats, all forms of retaliation, and effective elimination of all forms of violation of human rights which include against HRD, whistle-blowers, complainants and community spokespersons. For example, training/briefing held at respective OUs summarized as per the following:</p> <table border="1" data-bbox="1039 1264 1615 1361"> <thead> <tr> <th>Estate/Mill</th> <th>Date of briefing/training</th> </tr> </thead> <tbody> <tr> <td>Sindora POM</td> <td>3/10/2021</td> </tr> </tbody> </table>	Estate/Mill	Date of briefing/training	Sindora POM	3/10/2021	<p>Complied</p>
Estate/Mill	Date of briefing/training						
Sindora POM	3/10/2021						

		Sindora Estate	25/5/2021		
		Sg Papan Estate	4/6/2021		
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	KULIM (M) Berhad ensure all personnel are treated fairly and protected from any form of discrimination that would constitute a violation of their human rights. Interviewed with the workers confirmed that no harassment by the management.			Complied
<b>Criterion 4.2:</b> 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	<b>(C)</b> 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 whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	KULIM (M) Berhad has developed Sustainability Policy dated 01/10/2020 where KULIM will respect, support and protect international human rights against violence, threats, all forms of retaliation and contribute to the effective elimination of all forms of violations of human rights and fundamental freedoms of individuals and peoples which includes Environmental Human Rights Defenders, whistle-blowers, complainants and community spokesperson.			Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	Briefings on grievance procedures are given to ensure that the system is understood by affected parties. To ensure understanding by illiterate parties, the briefings were given verbally, and when necessary, translators from among the workers (usually a worker representatives) are sought to translate documents including procedures for dealing with complaints and grievances. This was duly confirmed by the workers interviewed.			Complied
4.2.3	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. - Minor compliance -	Based on complaints book sighted, aggrieved parties were informed of the progress of their grievance, and the outcome was communicated and acknowledged by the complainant.			Complied
4.2.4	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	Clause 5.5 of Grievance Mechanism Doc. No. SQD/SMS/4.1 Issue No. 1 dated 1 August 2020 gives the option to engage independent legal, technical advice and third-party mediator.			Complied



	and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -										
<b>Criterion 4.3:</b> The unit of Certification contributes to local sustainable development as agreed by local communities.											
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	Sindora POM certification has made contribution to the local communities such as donation to the events from school and mosque. Seen the petty cash vouchers for the donation made for COVID19 food ration and school donation. Among estate’s contributions sample as per below: <u>Basir Ismail Estate</u> i) Food claim for COVID-19 ii) SK Nam Heng (beautification of classroom) <u>Sg Papan Estate</u> i) School donation – Sekolah Agama Tanjung Serindit and SJKT Ladang Sg Papan	Complied								
<b>Criterion 4.4:</b> 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.											
4.4.1	<b>(C)</b> 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. - Critical (Major) compliance -	Land title was available and reviewed by the assessor. Kulim (M) Berhad has the legal ownership/lease which stated in the land title. Documents showing legal ownership sighted available as following: <table border="1" data-bbox="1037 1082 1832 1262"> <thead> <tr> <th>Land title</th> <th>Land ownership/ history of land tenure</th> <th>Land use type</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Land title	Land ownership/ history of land tenure	Land use type	Estate					Complied
Land title	Land ownership/ history of land tenure	Land use type	Estate								

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**Revision 12 (Jun 2021)**

		<p>Sample: GRN 49875, lot 4399, Mukim: Kota Tinggi, District: Kota Tinggi</p> <p>Land area: 532.5 ha</p> <p>Total land titles: 14 (2,231.4916 ha)</p>	Freehold	No specific term	REM Estate		
		<p>Sample: HS(D) 13179, lot 356, Mukim: Tanjung Surat, District: Kota Tinggi</p> <p>Land area: 2,028.6892 ha</p> <p>Total titles: 17 (2,995.8526 ha)</p>	Leasehold for 99 years (expired on 22/9/2090)	Agriculture	Sg Papan Estate		
		<p>Sample: HSD 17660, PTD 4435, Mukim: Rengam, District: Kluang</p> <p>Land area: 2,800.5108 ha</p>	Leasehold for 99 years (expired on 22/9/2090)	Oil palm cultivation	Sindora Estate		

		<p>Total titles: 4 (3,919.0638 ha)</p> <p>Sample: HSD 22664, Lot 1419, Mukim Sungai Tiram, Land area: 1,061.49 ha</p> <p>Total titles: 29</p> <p>Sample: HSD 354247, Lot 1419, Mukim Tebrau, Land area: 118.687 ha</p> <p>Total titles: 28</p>	Freehold	No specific term	Basir Ismail Estate		
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	There is no land dispute recorded. This was verified through stakeholders' consultation. In case of any arising land dispute (if applicable), the process will be based on Land Encroachment procedure (Doc. No.: PROP/MP/5 dated 09/06/2020, Rev. No. 4).				Complied	
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 land dispute recorded. This was verified through stakeholders' consultation. In case of any arising land dispute (if applicable), the process will be based on Land Encroachment procedure (Doc. No.: PROP/MP/5 dated 09/06/2020, Rev. No. 4). Thus, this indicator is not applicable.				Not Applicable	

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 land dispute recorded. This was verified through stakeholders' consultation. In case of any arising land dispute (if applicable), the process will be based on Land Encroachment procedure (Doc. No.: PROP/MP/5 dated 09/06/2020, Rev. No. 4). Thus, this indicator is not applicable.	Not Applicable
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 land dispute recorded. This was verified through stakeholders' consultation. In case of any arising land dispute (if applicable), the process will be based on Land Encroachment procedure (Doc. No.: PROP/MP/5 dated 09/06/2020, Rev. No. 4). Thus, this indicator is not applicable.	Not Applicable
4.4.3	<b>(C)</b> 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 land dispute recorded. This was verified through stakeholders' consultation. In case of any arising land dispute (if applicable), the process will be based on Land Encroachment procedure (Doc. No.: PROP/MP/5 dated 09/06/2020, Rev. No. 4). Thus, this indicator is not applicable.	Not Applicable
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 -	There is no land dispute recorded. This was verified through stakeholders' consultation. In case of any arising land dispute (if applicable), the process will be based on Land Encroachment procedure (Doc. No.: PROP/MP/5 dated 09/06/2020, Rev. No. 4). Thus, this indicator is not applicable.	Not Applicable
4.4.5	<b>(C)</b> 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. - Critical (Major) compliance -	There is no land dispute recorded. This was verified through stakeholders' consultation. In case of any arising land dispute (if applicable), the process will be based on Land Encroachment procedure (Doc. No.: PROP/MP/5 dated 09/06/2020, Rev. No. 4). Thus, this indicator is not applicable.	Not Applicable
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	There is no land dispute recorded. This was verified through stakeholders' consultation. In case of any arising land dispute (if applicable), the process will be based on Land Encroachment procedure (Doc. No.: PROP/MP/5 dated 09/06/2020, Rev. No. 4). Thus, this indicator is not applicable.	Not Applicable

	- Minor compliance -	will be based on Land Encroachment procedure (Doc. No.: PROP/MP/5 dated 09/06/2020, Rev. No. 4). Thus, this indicator is not applicable.	
<b>Criterion 4.5:</b> 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.			
4.5.1	<b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. Therefore, this indicator is not applicable.	Not Applicable
4.5.2	<b>(C)</b> 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. - Critical (Major) compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. Therefore, this indicator is not applicable	Not Applicable
4.5.3	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. - Minor compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. Therefore, this indicator is not applicable	Not Applicable
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	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. Therefore, this indicator is not applicable	Not Applicable

	options are considered. There is transparency of the land allocation process. - Minor compliance -		
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 -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. 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 -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. 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 -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. Therefore, this indicator is not applicable	Not Applicable
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. Therefore, this indicator is not applicable	Not Applicable
<b>Criterion 4.6:</b> 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	<b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	Procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation is in place and is contained in the SPO Negotiations Concerning Compensation Program dated 4 September	Complied

	- Critical (Major) compliance -	2007. This procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly.	
4.6.2	<b>(C)</b> 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. - Critical (Major) compliance -	An SOP known as Negotiations Concerning Compensation Program dated 4 September 2007 was established by Kulim (Malaysia) Berhad to identify legal and customary rights as well as people entitled to compensation as per procedure in place and is contained in the SPO Negotiations Concerning Compensation Program dated 4 September 2007. The procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly.	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	There was no dispute that involved compensation in Sindora Complex. Therefore, this indicator is not applicable	Not Applicable
4.6.4	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. - Minor compliance -	There was no dispute that involved compensation in Sindora Complex. Therefore, this indicator is not applicable	Not Applicable
<b>Criterion 4.7:</b> 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.			
4.7.1	<b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	KULIM (M) Berhad has developed Land Encroachment procedure (Doc. No.: PROP/MP/5 dated 09/06/2020, Rev. No. 4). The objective is to establish and maintain the procedures on handling properties encroachment cases. Flow chart of handling the land encroachment by the company and local communities was developed. Besides, compensation calculation (based on situation and management approval) was described in the procedure as well.	Complied
4.7.2	<b>(C)</b> 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	SOP as per indicator 4.6.1.	Complied

	<p>participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>		
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>There was no community that have lost access and rights to land for plantation since there was no expansion by the company during the time of audit. However, the company has provided job opportunity to the local communities as this has verified through the master list of employees.</p>	Complied
<p><b>Criterion 4.8:</b> 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>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land. Therefore, this indicator is not applicable</p>	Not Applicable
4.8.2	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land. Therefore, this indicator is not applicable</p>	Not Applicable
4.8.3	<p>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</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and</p>	Not Applicable



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	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 -	trenches were available to demarcate the boundary of land. Therefore, this indicator is not applicable	
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 -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land. Therefore, this indicator is not applicable	Not Applicable
<b>Principle 5: Support smallholder inclusion</b>			
<b>Criterion 5.1:</b> 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 -	Sindora POM is a Mass Balance Mill as evidenced by Certificate No. RSPO 612391 which is valid from 23 January 2019 to 22 January 2024. Starting from 31/12/2021, the mill has stopped receiving 3 <sup>rd</sup> party crop (independent/scheme smallholders and out growers) to prepare for Identify Preserved production.	Complied
5.1.2	<b>(C)</b> 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). - Critical (Major) compliance -	Sindora POM is a Mass Balance Mill as evidenced by Certificate No. RSPO 612391 which is valid from 23 January 2019 to 22 January 2024. Starting from 31/12/2021, the mill has stopped receiving 3 <sup>rd</sup> party crop (independent/scheme smallholders and out growers) to prepare for Identify Preserved production. Thus, this indicator is not applicable.	Not Applicable
5.1.3	<b>(C)</b> Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	Sindora POM is a Mass Balance Mill as evidenced by Certificate No. RSPO 612391 which is valid from 23 January 2019 to 22 January 2024. Starting from 31/12/2021, the mill has stopped receiving 3 <sup>rd</sup> party crop (independent/scheme smallholders and out growers) to prepare for Identify Preserved production. Thus, this indicator is not applicable..	Not Applicable
5.1.4	<b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders	Sindora POM is a Mass Balance Mill as evidenced by Certificate No. RSPO 612391 which is valid from 23 January 2019 to 22 January 2024. Starting	Not Applicable

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	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. - Critical (Major) compliance -	from 31/12/2021, the mill has stopped receiving 3 <sup>rd</sup> party crop (independent/scheme smallholders and out growers) to prepare for Identify Preserved production. Thus, this indicator is not applicable.									
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Sindora POM is a Mass Balance Mill as evidenced by Certificate No. RSPO 612391 which is valid from 23 January 2019 to 22 January 2024. Starting from 31/12/2021, the mill has stopped receiving 3 <sup>rd</sup> party crop (independent/scheme smallholders and out growers) to prepare for Identify Preserved production. Thus, this indicator is not applicable.	Not Applicable								
5.1.6	<b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	Sindora POM is a Mass Balance Mill as evidenced by Certificate No. RSPO 612391 which is valid from 23 January 2019 to 22 January 2024. Starting from 31/12/2021, the mill has stopped receiving 3 <sup>rd</sup> party crop (independent/scheme smallholders and out growers) to prepare for Identify Preserved production. Thus, this indicator is not applicable.	Not Applicable								
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	Even though no external crop/smallholder crop received at Sindora POM, records of weighing equipment stamping was maintained on annual basis at visited operating units even though there is no smallholder within Sindora POM certification unit. Summary of stamping records as follows: <table border="1" data-bbox="1037 1042 1832 1316"> <thead> <tr> <th>Weighing equipment</th> <th>Model/capacity</th> <th>Date of stamping, certificate no.</th> <th>Operating Unit</th> </tr> </thead> <tbody> <tr> <td>Serial no. B1219429</td> <td>ATK (E) BDI-2001, 80,0000 kg</td> <td>3/8/2021, JW-ATK 069848</td> <td>Sindora POM</td> </tr> </tbody> </table>	Weighing equipment	Model/capacity	Date of stamping, certificate no.	Operating Unit	Serial no. B1219429	ATK (E) BDI-2001, 80,0000 kg	3/8/2021, JW-ATK 069848	Sindora POM	Complied
Weighing equipment	Model/capacity	Date of stamping, certificate no.	Operating Unit								
Serial no. B1219429	ATK (E) BDI-2001, 80,0000 kg	3/8/2021, JW-ATK 069848	Sindora POM								

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		Serial no. 26699	ATK (E) GSE-350 60,000 kg	3/8/2021, JMU-ATK 000368		
5.1.8	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. - Minor compliance -	Sindora POM is a Mass Balance Mill as evidenced by Certificate No. RSPO 612391 which is valid from 23 January 2019 to 22 January 2024. Starting from 31/12/2021, the mill has stopped receiving 3 <sup>rd</sup> party crop (independent/scheme smallholders and out growers) to prepare for Identify Preserved production. Thus, this indicator is not applicable				Not Applicable
5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	Sindora POM is a Mass Balance Mill as evidenced by Certificate No. RSPO 612391 which is valid from 23 January 2019 to 22 January 2024. Starting from 31/12/2021, the mill has stopped receiving 3 <sup>rd</sup> party crop (independent/scheme smallholders and out growers) to prepare for Identify Preserved production. Thus, this indicator is not applicable				Not Applicable
<b>Criterion 5.2:</b> 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 -	Sindora POM is a Mass Balance Mill as evidenced by Certificate No. RSPO 612391 which is valid from 23 January 2019 to 22 January 2024. Starting from 31/12/2021, the mill has stopped receiving 3 <sup>rd</sup> party crop (independent/scheme smallholders and out growers) to prepare for Identify Preserved production. Thus, 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 -	Sindora POM is a Mass Balance Mill as evidenced by Certificate No. RSPO 612391 which is valid from 23 January 2019 to 22 January 2024. Starting from 31/12/2021, the mill has stopped receiving 3 <sup>rd</sup> party crop (independent/scheme smallholders and out growers) to prepare for Identify Preserved production. Thus, 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 -	Sindora POM is a Mass Balance Mill as evidenced by Certificate No. RSPO 612391 which is valid from 23 January 2019 to 22 January 2024. Starting from 31/12/2021, the mill has stopped receiving 3 <sup>rd</sup> party crop (independent/scheme smallholders and out growers) to prepare for Identify Preserved production. Thus, this indicator is not applicable	Not Applicable
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Sindora POM is a Mass Balance Mill as evidenced by Certificate No. RSPO 612391 which is valid from 23 January 2019 to 22 January 2024. Starting from 31/12/2021, the mill has stopped receiving 3 <sup>rd</sup> party crop (independent/scheme smallholders and out growers) to prepare for Identify Preserved production. Thus, 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 -	Sindora POM is a Mass Balance Mill as evidenced by Certificate No. RSPO 612391 which is valid from 23 January 2019 to 22 January 2024. Starting from 31/12/2021, the mill has stopped receiving 3 <sup>rd</sup> party crop (independent/scheme smallholders and out growers) to prepare for Identify Preserved production. Thus, this indicator is not applicable	Not Applicable
<b>Principle 6: Respect workers' rights and conditions</b>			
<b>Criterion 6.1:</b> Any form of discrimination is prohibited.			
6.1.1	<b>(C)</b> 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. - Critical (Major) compliance -	The Policies that have been developed by Kulim (Malaysia) Berhad to deal with equal opportunity and non-discrimination are: <ul style="list-style-type: none"> <li>a. Business Policy</li> <li>b. Core Labour Standard</li> <li>c. People Policy</li> </ul> where fairness and equal opportunities for relevant group such as all employees, including foreign and local are embedded. These Policies prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	Complied

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6.1.2	<p><b>(C)</b> 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 verification through interview, documentation review such as employment contract and pay slips, there was no evidence of discrimination of any forms. The recruitment fees were also not charged to any workers.</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>Reviewed during the audit was contract dated 13 February 2020 between Kulim (Malaysia) Berhad and PT Hamparan Karya Insani for manpower supply from Indonesia. The agreement states among others that cost of workers' transportation to the respective estates/mill will be borne by Kulim. The Demand Letter issued by Indonesian consulate dated 17 Feb 2020 also specifies that levy and PLKS fees are to be borne by employer. No recruitment fees are imposed on any of the foreign workers, and this was further confirmed by foreign workers interviewed.</p>	Complied								
6.1.4	<p>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.</p> <p>- Minor compliance -</p>	<p>Interviewed with the female workers confirmed that no pregnancy testing is conducted by the company as a measure for recruitment. Hospital Assistant will be informed if they are pregnant for any job transfer if related to chemical handling.</p>	Complied								
6.1.5	<p><b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>In place at the Sindora POM and its supply base is Women OnWards (WOW) committee which is a women employee outreach programme endorsed and funded by the Company. Its members comprise female employees and wives of workers. WOW promotes gender equality and empower women's knowledge and skills. Summary of meetings carried out at respective OUs:</p> <table border="1" data-bbox="1039 1158 1825 1350"> <thead> <tr> <th>Estate/mill</th> <th>Date of meeting</th> </tr> </thead> <tbody> <tr> <td>Sindora POM</td> <td>7/4/2021</td> </tr> <tr> <td>Sindora Estate</td> <td>8/1/2021</td> </tr> <tr> <td>REM Estate</td> <td>19/8/2021</td> </tr> </tbody> </table>	Estate/mill	Date of meeting	Sindora POM	7/4/2021	Sindora Estate	8/1/2021	REM Estate	19/8/2021	Complied
Estate/mill	Date of meeting										
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		<table border="1"> <tr> <td>Sg Papan Estate</td> <td>21/9/2021</td> </tr> <tr> <td>Ulu Tiram Estate</td> <td>20/10/2021</td> </tr> <tr> <td>Basir Ismail</td> <td>16/1/2022</td> </tr> </table> <p>Based on minutes sighted, committee members were briefed on sexual harassment, domestic violence, how to make complaints if there was a case, reproductive rights, the new census for new mothers, and briefings on Company policies.</p>	Sg Papan Estate	21/9/2021	Ulu Tiram Estate	20/10/2021	Basir Ismail	16/1/2022	
Sg Papan Estate	21/9/2021								
Ulu Tiram Estate	20/10/2021								
Basir Ismail	16/1/2022								
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	From payslips reviewed, evidence was available that workers receive equal pay for the same work scope.	Complied						
<b>Criterion 6.2:</b> 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).									
6.2.1	<b>(C)</b> 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. - Critical (Major) compliance -	<p>Kulim (Malaysia) Berhad is a member of the Malaysian Agricultural Producers Association (MAPA) and is therefore subjected to the agreement between MAPA and the National Union of Plantation Workers (NUPW). Applicable labour laws related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc are contained in workers' employment contracts. Sampled were employment contracts for Malaysian and Indonesian workers which have been prepared in Bahasa Malaysia. For Bangladeshi workers, the contracts were in the workers' language, i.e. Bengali. For Bangladeshi workers whose contracts were in Bahasa Malaysia, they were briefed on the contents. Interviews conducted with the workers confirmed their understanding.</p> <p>Clause 9 of the employment contract also specifically states that unless otherwise stated, all terms and conditions of contract are subjected to the Employment Act 1955 and SOCSO Act 1969, and the current MAPA/NUPW contract.</p>	Complied						

		Also confirmed via sampled payslips that wages were paid in accordance with the relevant laws. Salary deductions and overtime were in accordance with the relevant laws (SOCSO, EPF, EIS) and Labour Office permits.	
6.2.2	<p><b>(C)</b> 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>Details of payments and conditions of employment are stated and documented in the employment contracts given to all workers. The contract contains terms related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc. The terms are in compliance with the Employment Act 1955, Minimum Wages Order 2020, SOCSO Act 1969, EPF Act 1991, EIS Act 2017, and the MAPA/NUPW agreement.</p> <p>Payroll documents, namely the payslip, also give accurate information on compensation for all work done. This includes those who receive daily-rated wages, piece rated wages, payment for any overtime work done, and public holiday pay. Also confirmed via sampled payslips that wages were paid in compliance with national legal requirements. Salary deductions and overtime were in accordance with the relevant laws (SOCSO, EPF, EIS) and Labour Office permits. None of the sampled workers had any family members performing work.</p>	Complied
6.2.3	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>Based on review of punch cards, workers' employment contracts and payslips, evidence was available that Sindora POM and its supply base were able to demonstrate compliance with Employment Contracts 1955 related to regular working hours, overtime, sickness and holiday entitlement, maternity leave, etc. This includes statutory deductions (SOCSO, EPF, EIS) and non-statutory deductions (e.g. mosque funds, electricity bills, etc) in accordance with Labour Office permits. These permits are as detailed out under Indicator 2.1.1 above.</p> <p>Sampled during the audit were the following workers' employment contracts and payslips for the month of Feb 2021 (low crop), Dec 2020 (normal crop) and July 2021 (peak crop).</p> <p><u>Sindora POM (7 workers sampled out of 78 workers)</u></p>	Complied

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		<p>Workers No. 623187, 623224, 623222, 623201, 623134, 623218, 623165. <u>Sindora Estate (13 workers sampled out of 282 workers)</u> Workers No. 622474, 622617, 622054, 680727, 680598, 680095, 680648, 680653, 680619, 680715, 680658, 680798, 680801. <u>REM Estate (12 workers sampled)</u> Workers No. 618784, 618785, 618707, 618761, 618758, 618822, 618795, 951780, 618012, 618773, 618487, 618815 <u>Sg Papan Estate (12 workers sampled)</u> Workers No. 618784, 618785, 618707, 618761, 618758, 618822, 618795, 951780, 618012, 618773, 618487, 618815 <u>Extension of scope</u> Sampled during the audit were the following workers' employment contracts and payslips for the month of January 2022 (low crop), September 2021 (normal crop) and August 2021 (peak crop). <u>Basir Ismail Estate (12 workers sampled out of 230 workers)</u> Workers no. 603060, 603206, 603112, 603311, 603101, 603080, 603218, 603179, 602616, 602385, 603397, 603428. <u>Ulu Tiram (8 workers sampled out of 97 workers)</u> Workers 601590, 601107, 601546, 601607, 601304, 601587, 601597, 601512.</p>	
6.2.4	<p><b>(C)</b> 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</p>	<p>Hospital Assistant has carried out linesite inspection on weekly basis and once a month using the Linesite Management Guidelines checklist. The inspection will be cross-checked by the Assistant Managers of the estate. Line site visit during audit found that no issue was sighted. <u>Ulu Tiram Estate</u></p>	Complied



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	<p>of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Line site inspection (weekly) – 16/2/22, 9/2/22,  <u>REM Estate</u>  VMO: 9/2/22, 20/1/22 (fortnightly)  Line site: 13/2, 18/2  <u>Sg Papan Estate</u>  VMO: 8/3/22, 22/3/22 (fortnightly)  Line site: 4/3, 11/3, 18/3  <u>Sindora Estate</u>  Line site inspection: 27/3/22, 20/3/22, 13/3/22, 6/3/22  VMO: 30/3/22, 14/3/22</p> <p>Water and electricity were supplied by government and subsidized by the management. Clinic was available in the estates and the workers were provided with free medical facilities. Other welfare such as football field, mosque, temple, creche were available in the estates.</p>	
<p>6.2.5</p>	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Interviewed with the workers confirmed that they are easily access to adequate, sufficient and affordable foods where sundry shops are available inside the estates. Besides, some of the estates are located nearby to the town which easily accessible by the worker's.</p>	<p>Complied</p>
<p>6.2.6</p>	<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><b>PROCEDURAL NOTE:</b>  STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE  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</p>	<p>Based on pay slips sighted, all sampled workers who complete the number of days offered in a month receive at least minimum wages applicable, which is RM1,100-1,200 per month (depending on area), or more.</p> <p>Sindora POM and its supply base have also carried out the calculation of prevailing wages and in-kind benefits. The calculation took into account housing, electricity, water, education and healthcare. The breakdown of the prevailing wage calculation is therefore as follows:</p>	<p>Complied</p>

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<p>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"> <li>• Updated assessment on prevailing wages and in-kind benefits</li> </ul>	<table border="1" data-bbox="1039 368 1818 654"> <thead> <tr> <th>Mill/Estate</th> <th>In-kind benefits</th> <th>Average take-home pay</th> <th>Prevailing wage</th> </tr> </thead> <tbody> <tr> <td>Sindora POM</td> <td>RM 712.09.00</td> <td>RM1,703.00</td> <td>RM2,415.09</td> </tr> <tr> <td>Sindora Estate</td> <td>RM 459.67</td> <td>RM2,185.39</td> <td>RM2,645.06</td> </tr> <tr> <td>REM Estate</td> <td>RM 517.50</td> <td>RM1,100</td> <td>RM1,617.50</td> </tr> <tr> <td>Sg Papan Estate</td> <td>RM 611.91</td> <td>RM1,100</td> <td>RM1,711.91</td> </tr> </tbody> </table> <p>Based on the breakdown given, the calculation of prevailing wages including in-kind benefits is reasonable.</p>	Mill/Estate	In-kind benefits	Average take-home pay	Prevailing wage	Sindora POM	RM 712.09.00	RM1,703.00	RM2,415.09	Sindora Estate	RM 459.67	RM2,185.39	RM2,645.06	REM Estate	RM 517.50	RM1,100	RM1,617.50	Sg Papan Estate	RM 611.91	RM1,100	RM1,711.91
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	<ul style="list-style-type: none"> <li>• There is annual progress on the implementation of living wages</li> <li>• 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</li> <li>• 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.</li> </ul> <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 core works are performed by permanent and full-time employees in Sindora Complex. There were contractors' workers working for harvesting in the estates permanently. There were no casual or temporary workers used in the company.</p>	Complied
<p><b>Criterion 6.3:</b> 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><b>(C)</b> 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>A published statement on freedom of association is available and displayed at the main notice boards within the Sindora Mill and its supply base. Also sighted were:</p> <ul style="list-style-type: none"> <li>- Paragraph 2 of the Employees' Guide Book which confirms and respects workers' rights to join a union recognized by the Kulim (Malaysia) Berhad.</li> </ul> <p>Kulim (Malaysia) Berhad's Core Labour Standards on Rights of Employees which states that Kulim recognises and respects the rights of employees to form and/or join trade unions of their choice which are given due recognition by KULIM.</p>	Complied
6.3.2	<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>Sindora POM has established NUPW committee and meeting was conducted which involved the participation of NUPW representatives, AMESU representative and management representative. The last meeting was conducted on 05/10/2020 and meeting minutes was sighted. There were</p>	Complied

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		<p>issues raised during the meeting and the management has developed the action plan for the issues raised. Date of meeting verified as per the following:</p> <p><u>Basir Ismail Estate</u></p> <p>The latest meeting was carried out on 22/9/2021. Issues related to cleanliness of housing complex and fences for surau were discussed. So far no pending issue reported in the minutes of meeting.</p> <p>Ulu Tiram Estate –10/6/21</p> <p>Sg Papan Estate – 19/9/21</p> <p>Sindora Estate – 10/9/21</p> <p>Sindora POM – 3/10/21</p>	
6.3.3	<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>Based on interviews held with NUPW representatives, review of minutes of meeting between NUPW representatives, evidence was available that management does not interfere with the formation or operation of the NUPW. Workers’ representatives were chosen from among the workers as confirmed by the workers during interview.</p>	Complied
<b>Criterion 6.4:</b> 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>Kulim (Malaysia) Berhad has established Core Labour Standard Policy dated 1 May 2018 where they are not engage in or support the use of Child Labour and will provide adequate support to enable children of its employees to attend and remain in school until no longer a child. The minimum age of workers to recruit is 18 years old. This requirement is also included in all agreements with its contractors via Addendum to the Agreement. Sighted were the addendums signed by Semai Setia Transport, SBK Sdn Bhd and harvesting contractor, Agro-Sakthi Enterprise</p>	Complied
6.4.2	<p><b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national</p>	<p>Documentary evidence is available that minimum age requirements are met. This is based on workers’ check roll list and copies of their passport/NRIC</p>	Complied

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	<p>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>details. Based on workers' NRIC and passports, all workers were at least 18 years old when employed.</p>	
6.4.3	<p><b>(C)</b> Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the workers list of all Sindora Palm Oil Mill and its supply base, interviews conducted, and observations made, there is no evidence that young persons are being employed.</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.</p> <p>- Minor compliance -</p>	<p>Kulim (Malaysia) Berhad has established Core Labour Standard Policy dated 1 May 2018 where they are not engage in or support the use of Child Labour and will provide adequate support to enable children of its employees to attend and remain in school until no longer a child. This Policy is displayed on main notice boards. This Policy was also communicated during stakeholder meeting held on 12<sup>th</sup> October 2021. Further, an Addendum to agreements signed with contractors also contains a provision which states that the contractor shall comply with applicable labour and employment laws regarding and prohibit any form of child labour, forced or trafficked labour. Interviews held with contractors and suppliers also confirmed their understanding of this obligation.</p>	Complied
<p><b>Criterion 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p><b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>A Policy to prevent sexual and other forms of harassment are available in Sexual Harassment Policy dated 1 May 2018 signed by Executive Director.</p>	Complied
6.5.2	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Kulim (Malaysia) Berhad's Core Labour Standard dated 1 May 2018 signed by Executive Director provides protection of reproductive rights of all workers. The Labour Standard specifies that the Company recognizes the rights of employees to reproduction and reproductive health, including the right to make decision on reproduction. Based on interviews with the workers, there</p>	Complied

		is evidence that this Standard is being implemented where female workers are entitled to 60 days paid maternity leave, and pregnant women are given light work to do.	
6.5.3	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. - Minor compliance -	Assessment of new mothers' needs were done via a census form. The census form assessed the mothers' needs for creche/childcare, antenatal, vaccination, maternity and paternity, postpartum care, prenatal check-up, breastfeeding facilities, awareness and counselling. Also the assessment was also discussed during gender committee meetings as respective operating units.	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	Available and reviewed during the audit was Grievance mechanism Doc. No. SQD/SMS/4.1 Issue No. 1 dated 1 Aug 2020. The aim of this mechanism is to have a documented system for dealing with complaints and grievances that is agreeable and accepted by all stakeholders. The scope covers all parties who deal with Kulim (Malaysia) Berhad who may have complaints or grievances. Clause 5.8 states that anonymity of complainants will be respected and protected if requested.	Complied
<b>Criterion 6.6:</b> No forms of forced or trafficked labour are used.			
6.6.1	<b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited: <ul style="list-style-type: none"> <li>Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>Charging the workers for recruitment fees.</li> <li>Contract substitution</li> <li>Involuntary overtime</li> <li>Lack of freedom of workers to resign</li> <li>Penalty for termination of employment</li> <li>Debt bondage</li> </ul>	<p>Sindora Mill and its supply base are able to demonstrate that all workers have entered into employment voluntarily. This was further confirmed from interviews conducted with the workers themselves.</p> <p><b>Passports:</b> Workers are given the option of either keeping their own passports, or to keep their passports at the management office for safety reasons. Sighted during the audit, letters from workers confirming their preference to keep their passports at the office for safety reasons.</p> <p><b>Recruitment fees:</b> Reviewed was contract dated 13 February 2020 between Kulim (Malaysia) Berhad and PT Hamparan Karya Insani for manpower supply from Indonesia. The agreement states among others, that cost of transportation to the</p>	Complied

	<ul style="list-style-type: none"> <li>• Withholding of wages</li> <li>- Critical (Major) compliance -</li> </ul>	<p>respective estates/mill will be borne by Kulim. The Demand Letter issued by Indonesian consulate dated 17 Feb 2020 also specifies that levy and PLKS fees are to be borne by employer. No recruitment fees are imposed on any of the foreign workers. This was further confirmed in interviews held with the workers from Indonesia and Bangladesh.</p> <p><b>Contract substitution:</b>  Employment contracts with workers, recruitment agent contracts with PT Hamparan Karya Insani and PT Wira Karitas, and interviews held with the workers from Indonesia and Bangladesh confirmed that no contract substitution has occurred within the Sindora Mill and its supply base.</p> <p><b>Involuntary overtime:</b>  Based on documents signed by workers on overtime, and based on interviews conducted, there is no evidence of involuntary overtime within the Sindora Mill and its supply base.</p> <p><b>Lack of freedom of workers to resign &amp; penalty for termination of employment:</b>  Clause 5 of employment contracts allow for early termination of contract by giving of 2 months’ notice (upon confirmation) and 2 weeks’ notice (on probation). There is no mention of any penalty payable.</p> <p><b>Debt bondage &amp; withholding of wages:</b>  Based on payslips sighted and interview with workers, there was no evidence of any debt bondage and withholding of wages.</p>	
6.6.2	<p><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <ul style="list-style-type: none"> <li>- Critical (Major) compliance -</li> </ul>	<p>A special labour policy and procedures have been established under the Kulim (Malaysia) Berhad Core Labour Standard signed by Executive Director dated 1 May 2018. This Policy:</p> <ul style="list-style-type: none"> <li>- prohibits the employment of children and young persons, forced and bonded labour</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>- provides for signing of written employment contracts in a language they understand with clear remuneration and description of duties</li> <li>- workers' entitlement to housing and basic amenities which are at par with statutory requirements</li> <li>- free of discrimination, coercion or violence</li> <li>- rights of employees to join trade unions</li> <li>- accessibility to grievance procedure</li> <li>- entitled to one day off per week.</li> </ul> <p>Based on pay slips, employment contracts, punch cards reviewed, and interviews conducted with workers, Sindora Mill and its supply base are able to demonstrate the implementation of this Policy.</p>	
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**Criterion 6.7:** The unit of certification ensures that the working environment under its control is safe and without undue risk to health.

<p>6.7.1</p> <p><b>(C)</b> The responsible person(s) for H&amp;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>The estates and mill management have conducted the regulated quarterly safety committee meeting with the participation of workers representative. Minutes of meetings were made available for verification which dated as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">OU</th> <th colspan="4">Quarter and dates</th> </tr> <tr> <th>03/2021</th> <th>02/2021</th> <th>01/2021</th> <th>04/2020</th> </tr> </thead> <tbody> <tr> <td>S POM</td> <td>13/10</td> <td>13/06</td> <td>25/03</td> <td>27/11</td> </tr> <tr> <td>Sindora</td> <td>06/09</td> <td>07/06</td> <td>16/05</td> <td>18/12</td> </tr> <tr> <td>REM</td> <td>14/10</td> <td>25/08</td> <td>28/04</td> <td>25/12</td> </tr> <tr> <td>Sg Papan</td> <td>09/09</td> <td>10/06</td> <td>10/03</td> <td>30/12</td> </tr> </tbody> </table> <p>Generally, among the agenda discussed in the meetings are:</p> <ul style="list-style-type: none"> <li>• Confirmation of minutes previous meeting</li> <li>• Workplace inspection report</li> <li>• Accident report</li> <li>• General Safety</li> </ul>	OU	Quarter and dates				03/2021	02/2021	01/2021	04/2020	S POM	13/10	13/06	25/03	27/11	Sindora	06/09	07/06	16/05	18/12	REM	14/10	25/08	28/04	25/12	Sg Papan	09/09	10/06	10/03	30/12	<p>Complied</p>
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		<ul style="list-style-type: none"> <li>Complaint from Employee/External Party</li> <li>Other matters</li> </ul> <p>Workplace inspections were made prior to the committee meeting. The respective operating units' managers were appointed as the chairman of the committees based on a letter dated 15/09/2021 [ref.: SQD/ADMIN/020/021] from the Kulim's ESG Committee (Occupational Safety &amp; Health) Chairman.</p>	
<p>6.7.2</p>	<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>The procedures for accident and emergencies have been established. There is formation of ERP Team &amp; ERP for all the identified incidences. In addition, the procedures have been summarized in a chart flow form and displayed for information of all employees in the estates/mill. They include emergencies relating fire, chemical spillage, flood and accident at work place.</p> <p>a) <i>Ahli J/Kuasa Pasukan Bertindak Kecemasan 2021 headed by the Estate/Mill Manager</i>  b) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Kebakaran</i>  c) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Banjir</i>  d) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Tumpahan Kimia</i></p> <p>The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures and guidelines were issued by SQD and amended to tailor to the situation differences in the estates and mill.</p> <p>ERT members have been provided with training on emergency procedures appropriate to their respective workplace and level of risk. The trainings were conducted by an accredited or qualified organization who can demonstrate their suitability to provide training.</p> <p>The trained personnel for the First Aid were among the employees working as field staff/mandores. The first aid boxes were available at various points in the estate office, workshop, and store. The estate distributed the first aid box to the mandores and brought along to the field during operations.</p> <p>Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA (Lost Man day MC). Records of accidents were</p>	<p>OFI</p>

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		summarized in the JKPP 8 form annually and submitted to the authority (Dept. of Safety & Health) as regulated. Records are kept for a minimum 10 years in the office.	
6.7.3	<p><b>(C)</b> 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>The management provides appropriate PPE to the employees in accordance to HIRARC and Standard Operating Procedure. PPE issuance records were well maintained and made available for verification. Among the information available in the record was name of employee, type of PPE (i.e. apron, safety shoes, rubber boots, N95 mask, respirator, cartridge, helmet, goggle, cotton gloves, nitrile gloves, etc.), date of PPE received and receipt acknowledgement by the recipient. On site verification and interview with workers showed that the appropriate PPE was provided for free and worn accordingly.</p> <p>Sanitation facilities such as shower room, PPE washing area, personal clothing locker for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing were provided and well maintained.</p> <p>At Sungai Papan Estate, it was found that a mechanical buffalo driver and FFB ramp attendant were not wearing safety shoes during work as what required in the company's Safe Operating Procedure (SOP). Apart from that, at Sindora Estate, it was found that the workshop foreman was not provided with personal hearing protection (PHP) with at least NRR 30 dB, as recommended in the Noise Risk Assessment report [HQ/18/PEB/00/00014-2021/019], received on 17/02/2022. Thus, a major NC was issued.</p>	Non-compliance
6.7.4	<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>Should there be any medical care needed by the employees, clinics with certified Medical or Hospital Assistants in-charge were provided at all the sampled management units. Based on site visits, all the clinics were well maintained and managed. Records of medical inventory, VMO visits and patients treated were made available for verification.</p>	Complied

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		<p>The sampled estates and mill are subscribing to SOCSO to cover the accident insurance for all their workers. Latest monthly contributions were verified and confirmed the following details:</p> <table border="1" data-bbox="1039 475 1937 810"> <thead> <tr> <th>Estates/mill</th> <th>Transaction date</th> <th>Payment voucher Ref. No.</th> <th>No. of employees covered</th> <th>Ammount (RM)</th> </tr> </thead> <tbody> <tr> <td>Basir Ismail</td> <td>06/02/2022</td> <td>22000119</td> <td>267</td> <td>10,345.50</td> </tr> <tr> <td>REM</td> <td>07/02/2022</td> <td>22000113</td> <td>160</td> <td>5,674.00</td> </tr> <tr> <td>Sg Papan</td> <td>10/03/2022</td> <td>22000442</td> <td>162</td> <td>5,293.50</td> </tr> <tr> <td>Sindora Est.</td> <td>04/03/2022</td> <td>22000154</td> <td>306</td> <td>10,627.30</td> </tr> <tr> <td>Sindora POM</td> <td>04/03/2022</td> <td>11000253</td> <td>101</td> <td>4,448.10</td> </tr> </tbody> </table>	Estates/mill	Transaction date	Payment voucher Ref. No.	No. of employees covered	Ammount (RM)	Basir Ismail	06/02/2022	22000119	267	10,345.50	REM	07/02/2022	22000113	160	5,674.00	Sg Papan	10/03/2022	22000442	162	5,293.50	Sindora Est.	04/03/2022	22000154	306	10,627.30	Sindora POM	04/03/2022	11000253	101	4,448.10	
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6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>The RSPO's Lost Time Injury Frequency Rate (LTIFR) metrics was used to record the number of lost time injuries and total hours worked for the period of Jan - Dec of 2020. Verification against the certification unit's other records such as JKPP 8 found the data to be accurate.</p>	Complied																														
<p><b>Principle 7: Protect, conserve and enhance ecosystems and the environment</b></p>																																	
<p><b>Criterion 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>																																	
7.1.1	<p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>The sampled estates continued to monitor the Implementation of Integrated Pest Management (IPM) plans.</p> <ul style="list-style-type: none"> <li>- The estates had in place the documented IPM plan which covered the monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides. The plan was guided by ARM Section J01-J10.</li> <li>- To minimize use of insecticides on leaf-eating pest, the estates planted beneficial plants such as Turnera subulata, Cassia cobanensis, Antigonon leptopus, Euphorbia heterophylla, along the roadsides and</li> </ul>	Complied																														

		<p>designated points in the fields and also within the nursery perimeter.</p> <ul style="list-style-type: none"> <li>- The plan also advocated single layer compost mulching in order to prevent the breeding of rhinoceros beetles. Monthly detection and observation of leaf eating pests, mammalian pests and diseases had been continued. These monthly detection and observations were carried by staff.</li> <li>- Census records for Ganoderma affected palms were verified. All the estates carried census on rat damage and diseases like Ganoderma.</li> <li>- Rat baiting was by calendar baiting at 2 campaigns per year where recommended by the PI /Agronomist. Baiting are continued until bait acceptance threshold level</li> </ul>	
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>The was no evidence that species referenced in the Global Invasive Species Database and CABI.org are being used in all the sampled estates.</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>There was no evidence that use of fire for pest control at all the sampled estates.</p>	Complied
<p><b>Criterion 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
7.2.1	<p><b>(C)</b> 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>The justification of all pesticides used in the estate were documented in Kulim (M) Bhd Agricultural Manual (dated 01/07/2013), Section H, Justification of Chemical Use. The manual provides the guideline on type of agrochemical use, target pest/weed/disease, weed situation, recommended chemical brand name, application rate, and method of application. Verification of chemical register, chemical issuance records, and site visits showed that the pesticides used were in accordance to the justification in the manual.</p>	Complied

7.2.2	<p><b>(C)</b> 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>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate. Based on the records, the total a.i. per ha for 2021 at all the sampled estates was less than 1 lt a.i./ha for both matured and immature areas.</p>	Complied
7.2.3	<p><b>(C)</b> 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 quantity of agrochemicals required for various field conditions is documented and justified in Kulim (M) Bhd Agricultural Manual (dated 01/07/2013), Section H, Justification of Chemical Use. The manual provides the guideline on type of agrochemical use, target pest/weed/disease, weed situation, recommended chemical brand name, application rate, and method of application. Verification of chemical register, chemical issuance records, and site visits showed that the pesticides used were in accordance to the justification in the manual.</p> <p>The implementation in the field is consistent with the SOP established. Class I herbicide is no longer in used by all the sampled estates.</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>There was no evidence of prophylactic use of pesticide at all the sampled estates.</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 by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ol style="list-style-type: none"> <li>Judgment of the threat and verify why this is a major threat</li> <li>Why there is no other alternative which can be used</li> <li>Which process was applied to verify why there is no other less hazardous alternative</li> </ol>	<p>The sampled estates in the confined usage of pesticides which are were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000.</p> <ol style="list-style-type: none"> <li>The review of the chemical register concluded that all pesticides used were of class II, III &amp; class IV. The use of paraquat had been prohibited in all Kulim's estates.</li> <li>There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions has been used.</li> <li>Verified from records and interviews with workers, staff and estate assistants, concluded that trainings were held with all precautions being taken and all legal requirements met.</li> </ol>	Complied

	<p>d) What is the process to limit the negative impacts of the application</p> <p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</p>	<p>d) Based on the regulated chemical register, among the chemical used in the estates are as follows:</p> <table border="1" data-bbox="1120 427 1832 662"> <thead> <tr> <th>No.</th> <th>Chemical name</th> <th>Class</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Glyphosate Isopropylamine</td> <td>III</td> </tr> <tr> <td>2</td> <td>2,4-Dichzopher noxyacedic dimethylamen</td> <td>II</td> </tr> <tr> <td>3</td> <td>Glufosinate ammonium</td> <td>III</td> </tr> <tr> <td>4</td> <td>Triclopyr butoxy ethylester</td> <td>III</td> </tr> <tr> <td>5</td> <td>Flocoumafen</td> <td>IV</td> </tr> <tr> <td>6</td> <td>Metsulfuron methyl</td> <td>IV</td> </tr> </tbody> </table> <p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak are guided by Kulim (M) Bhd Agricultural Manual (dated 01/07/2013), Section I, Weeds Management and Section J, integrated Pest Management. The Sections cover the frequency &amp; timing to apply chemical and steps to be taken to detect level of pest attack such as carrying out pest census.</p>	No.	Chemical name	Class	1	Glyphosate Isopropylamine	III	2	2,4-Dichzopher noxyacedic dimethylamen	II	3	Glufosinate ammonium	III	4	Triclopyr butoxy ethylester	III	5	Flocoumafen	IV	6	Metsulfuron methyl	IV	
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5	Flocoumafen	IV																						
6	Metsulfuron methyl	IV																						
7.2.6	<p><b>(C)</b> 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>Trainings on safe handling of chemical and right method of spraying were given to the relevant employees which include the storekeeper, pre-mixers, and herbicides sprayers. This is also in-line with the recommendation by the CHRA assessor. Various methods of training such as briefing, practical training and on-the-job supervisions were used to ensure effective delivery of knowledge. Records of training were well maintained for verification.</p>	Complied																					
7.2.7	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in all estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the store keeper was seen to unlock the pad-lock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage</p>	Complied																					

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		<p>with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety Data Sheet were available.</p>	
<p>7.2.8</p>	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.          - Minor compliance -</p>	<p>Excess chemical containers that were not used for premixing have been triple rinsed and punctured was categorized under scheduled waste and disposed through waste contractors.</p> <p><u>Sindora POM</u></p> <ul style="list-style-type: none"> <li>- 0.2742 Mt of Plastic Pesticide Containers were disposed on 29/09/2021 to Kualiti Alam Sdn. Bhd. Verified the Consignment Note Number: 2021092918VI1X5S.</li> </ul> <p><u>Sungai Papan Estate</u></p> <ul style="list-style-type: none"> <li>- Triple Rinsing Training was conducted for the PIC on 04/01/2021 and 02/07/2021.</li> <li>- Disposal of Chemical Containers; 20 Litres: 60 units; 4 Litres: 126 Units; 500g Containers: 56 Units; Disposed Date: 21/11/2021; Disposed to SS Setia Teknologi Enterprise.</li> </ul> <p><u>REM Estate</u></p> <ul style="list-style-type: none"> <li>- Triple Rinsing Training was conducted for the PIC on 03/01/2021 at the estate premix area.</li> <li>- Disposal of Chemical Containers; 20 Litres: 365 units; Plastic (): 30kg Disposed Date: 24/10/2021; Disposed to SS Setia Teknologi Enterprise.</li> </ul> <p><u>Ulu Tiram Estate</u></p> <ul style="list-style-type: none"> <li>- Triple Rinsing Training was conducted for the PIC on 03/01/2021 at the estate premix area.</li> <li>- Chemical Containers were triple rinsed, punctured and stored at the store as sighted during the visit.</li> </ul>	<p>Complied</p>

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		<p><u>Basir Ismail Estate</u></p> <ul style="list-style-type: none"> <li>- Triple Rinsing Training was conducted for the PIC on 05/05/2021 at the estate premix area.</li> </ul> <p>Plastic Pesticide Containers - 20 Litres: 116 Units, 500 gram: 116 Units; 1 Litres: 100 Units, 4 Litres: 30 Units, ; Disposal Date; 19/02/2022; Disposed to G-Planter Sdn Bhd.</p>																					
7.2.9	<p><b>(C)</b> 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>	Aerial spraying of pesticides is not practiced in the sampled estates.	Complied																				
7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Annual medical surveillances for pesticide operators were last conducted with the following details:</p> <table border="1"> <thead> <tr> <th>Estates &amp; Dates</th> <th>No. of operators</th> <th>Results</th> <th>OHD Reg. No.</th> </tr> </thead> <tbody> <tr> <td>Basir Ismail-10/11/2021</td> <td>41</td> <td>All fit</td> <td>HQ/11/DOC/00/235</td> </tr> <tr> <td>REM-14/11/2021</td> <td>39</td> <td>1 unfit</td> <td>HQ/11/DOC/00/235</td> </tr> <tr> <td>Ulu Tiram-9/11/2021</td> <td>11</td> <td>All fit</td> <td>HQ/11/DOC/00/235</td> </tr> <tr> <td>Sindora-7/11/2021</td> <td>8</td> <td>All fit</td> <td>HQ/11/DOC/00/235</td> </tr> </tbody> </table>	Estates & Dates	No. of operators	Results	OHD Reg. No.	Basir Ismail-10/11/2021	41	All fit	HQ/11/DOC/00/235	REM-14/11/2021	39	1 unfit	HQ/11/DOC/00/235	Ulu Tiram-9/11/2021	11	All fit	HQ/11/DOC/00/235	Sindora-7/11/2021	8	All fit	HQ/11/DOC/00/235	Complied
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7.2.11	<p><b>(C)</b> 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> <p>- Critical (Major) compliance -</p>	Based on site observation and verification of employee master list and interviews at the sampled estates, there is no evidence that work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions.	Complied																				
<p><b>Criterion 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>																							



<p>7.3.1</p>	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Sindora POM and the estates had identified all wastes and sources of pollution. The Waste Management Action Plan 2021 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estates and mill operations were:</p> <table border="1" data-bbox="1041 507 1825 1268"> <thead> <tr> <th>Waste type</th> <th>Source</th> </tr> </thead> <tbody> <tr> <td>Empty pesticide container (SW409)</td> <td>Chemical store</td> </tr> <tr> <td>Empty pesticide packaging (SW409)</td> <td>Chemical store</td> </tr> <tr> <td>Empty Hydrocarbon containers (SW409)</td> <td>Workshop</td> </tr> <tr> <td>Batteries (SW102)</td> <td>Workshop</td> </tr> <tr> <td>Spent oil (SW305)</td> <td>Workshop</td> </tr> <tr> <td>Contaminated Rags / sacks (SW410)</td> <td>Fertilizer store, Chemical store</td> </tr> <tr> <td>Hydrocarbon / pesticide spillages (SW408)</td> <td>Workshop</td> </tr> <tr> <td>Contaminated soil (SW409)</td> <td>Workshop</td> </tr> <tr> <td>Medical Waste</td> <td>Clinic</td> </tr> <tr> <td>Effluent Discharge (Mill)</td> <td>Furrow</td> </tr> <tr> <td>POME (Mill)</td> <td>Extraction of CPO</td> </tr> </tbody> </table> <p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2021. The waste generated from the mill/estates operations as shown below. This CU</p>	Waste type	Source	Empty pesticide container (SW409)	Chemical store	Empty pesticide packaging (SW409)	Chemical store	Empty Hydrocarbon containers (SW409)	Workshop	Batteries (SW102)	Workshop	Spent oil (SW305)	Workshop	Contaminated Rags / sacks (SW410)	Fertilizer store, Chemical store	Hydrocarbon / pesticide spillages (SW408)	Workshop	Contaminated soil (SW409)	Workshop	Medical Waste	Clinic	Effluent Discharge (Mill)	Furrow	POME (Mill)	Extraction of CPO	<p>OFI</p>
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		<p>has identified all waste products and its source of pollution and documented in Types of Waste Products and Method of Disposal. The waste identified as follows:</p> <table border="1" data-bbox="1048 488 1827 815"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Scheduled waste</td> <td>SW409, SW102, SW305, SW410, SW408, SW409, SW307, SW410, SW422, SW430, SW307, SW404, SW110, SW110/109</td> </tr> <tr> <td>2</td> <td>Non-Schedule waste</td> <td>Domestic waste, Plastic, Garden waste, Kitchen waste, Scrap Iron, Empty Bags, Empty Pesticide containers, palm by product, Liquid waste, Office waste, Rubber materials, POME, Black Smoke etc.</td> </tr> </tbody> </table>		Type of waste	Details	1	Scheduled waste	SW409, SW102, SW305, SW410, SW408, SW409, SW307, SW410, SW422, SW430, SW307, SW404, SW110, SW110/109	2	Non-Schedule waste	Domestic waste, Plastic, Garden waste, Kitchen waste, Scrap Iron, Empty Bags, Empty Pesticide containers, palm by product, Liquid waste, Office waste, Rubber materials, POME, Black Smoke etc.	
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7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Procedure of Schedule waste management has been established. Refer Labelling, Handling, Storage and Disposal of Schedule waste dated 18/10/2018 document number SDM/WI/5.</p> <p>Sighted Record of Inventory of Schedule Waste and Disposal Record:  <u>Basir Ismail Estate</u>  <u>Inventory</u></p> <ul style="list-style-type: none"> <li>• File reference Number: AS(B)J11/123/000/053</li> <li>• Date Reporting: 29/01/2022</li> <li>• Waste Generated: SW110, SW 305, SW307, SW408, SW409, SW410</li> </ul> <p><u>Disposal</u></p> <ul style="list-style-type: none"> <li>• Disposal consignment note: 2022021811M7SEFC</li> <li>• Date Disposal: 18/02/2022</li> <li>• SW404 Pathogenic wastes, clinical waste or quarantined material: 0.0007 MT by Kualiti Alam Sdn Bhd</li> </ul>	Complied									

		<p><u>Ulu Tiram Estate</u></p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> <li>• File reference Number: AS(B)J11/123/000/053</li> <li>• Date Reporting: 21/02/2022</li> <li>• Waste Generated: SW110, SW 305, SW307, SW408, SW409, SW410</li> </ul> <p><u>Disposal</u></p> <ul style="list-style-type: none"> <li>• Disposal consignment note: 2022022113LVXMAJ</li> <li>• Date Disposal: 08/02/2022</li> <li>• SW110: E-Waste: 1.335 MT by Kualiti Alam Sdn Bhd</li> </ul> <p><u>REM Estate</u></p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> <li>• File reference Number: AS(B)J11/123/000/179</li> <li>• Date Reporting: 28/02/2022</li> <li>• Waste Generated: SW102, SW110, SW 305, SW 306, SW307, SW408, SW409, SW410</li> </ul> <p><u>Disposal</u></p> <ul style="list-style-type: none"> <li>• Disposal consignment note: 2022021217HJ3FSE</li> <li>• Date Disposal: 13/02/2022</li> <li>• SW305: Spent lubricating oil: 0.0150 MT by Kualiti Alam Sdn Bhd</li> </ul> <p><u>Sg Papan Estate</u></p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> <li>• File reference Number: AS(B)J11/123/000/157</li> <li>• Date Reporting: 22/02/2022</li> <li>• Waste Generated: SW102, SW110, SW 305, SW 306, SW307, SW408, SW409, SW410</li> </ul> <p><u>Disposal</u></p>	
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		<ul style="list-style-type: none"> <li>• Disposal consignment note: 0164300</li> <li>• Date Disposal: 22/02/2022</li> <li>• SW408: Spent lubricating oil: 0.15 MT by Kualiti Alam Sdn Bhd</li> </ul> <p><u>Sindora Estate</u></p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> <li>• File reference Number: AS(B)J11/123/000/157</li> <li>• Date Reporting: 22/02/2022</li> <li>• Waste Generated: SW102, SW110, SW 305, SW 306, SW307, SW408, SW409, SW410</li> </ul> <p><u>Disposal</u></p> <ul style="list-style-type: none"> <li>• Disposal consignment note: 090875-001</li> <li>• Date Disposal: 25/01/2022</li> <li>• SW409: Pesticide container: 0.72 MT by Kualiti Alam Sdn Bhd</li> </ul> <p>At the Sindora POM the following procedures are used to identify, record, segregate and dispose wastes:</p> <ol style="list-style-type: none"> <li>1. Labelling, Handling, Storage and Disposal of Scheduled Waste Doc. No. SDM/WI/5 dated 18.10.2018 Rev.01</li> <li>2. Waste Management (Boiler Ash and Decanter Cake) Doc. No. SDM/WI/8 DATED 1.7.2007 Rev.00</li> <li>3. Handling, Storage and Disposal of Metal waste (scrap Iron) Doc. No. SDM/WI/7 dated 1.7.2007 Rev.00 Similar to the mill, the estates use the below document:</li> <li>4. Scheduled Waste Management Guidelines issue no.1, dated 15.5.2007</li> <li>5. *Non-Scheduled Waste Guidelines issue no.1, dated 15.5.2007 * domestic wastes and general office</li> </ol> <p><u>Sindora POM</u></p>	
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		<p><u>Inventory</u></p> <ul style="list-style-type: none"> <li>File reference Number: ASJ(B)J/31/152/000/075</li> <li>Date Reporting: 07/03/2022</li> <li>Waste Generated: SW102, SW110, SW 305, SW 306, SW307, SW408, SW409, SW410</li> </ul> <p><u>Disposal</u></p> <ul style="list-style-type: none"> <li>Disposal consignment note: 2021102711FKWAYG</li> <li>Date Disposal: 25/10/2021</li> <li>SW305: Spent Lubricating Oil: 2.28 MT by Kualiti Alam Sdn Bhd</li> </ul> <p><u>Disposal</u></p> <ul style="list-style-type: none"> <li>Disposal consignment note: 2021102711QUELOV</li> <li>Date Disposal: 22/10/2021</li> </ul> <p>SW410: Rags, Plastic: 0.069 MT by Kualiti Alam Sdn Bhd</p>																												
7.3.3	<p>The unit of certification does not use open fire for waste disposal.          - Minor compliance -</p>	<p>Disposal for domestic and non-hazardous waste is through landfilling at designated area within estate. Segregation of non-degradable and degradable waste was done at site and dumping of waste only allowed for degradable waste. Verified at sampled estates as below:</p> <table border="1" data-bbox="1039 1027 1827 1380"> <thead> <tr> <th rowspan="2">Estate/POM</th> <th colspan="3">Landfill</th> </tr> <tr> <th>Block No</th> <th>Pit No</th> <th>Date Open/Closed</th> </tr> </thead> <tbody> <tr> <td>Basir Ismail</td> <td>P13/1</td> <td>35</td> <td>14/02/2022</td> </tr> <tr> <td>Ulu Tiram</td> <td>P86</td> <td>50</td> <td>11/02/2021</td> </tr> <tr> <td>REM</td> <td>P10/3</td> <td>57</td> <td>29/12/2021</td> </tr> <tr> <td>Sg Papan</td> <td>P03/1</td> <td>L91</td> <td>01/04/2022</td> </tr> <tr> <td>Sindora</td> <td>P06/1</td> <td>48</td> <td>01/04/2022</td> </tr> </tbody> </table>	Estate/POM	Landfill			Block No	Pit No	Date Open/Closed	Basir Ismail	P13/1	35	14/02/2022	Ulu Tiram	P86	50	11/02/2021	REM	P10/3	57	29/12/2021	Sg Papan	P03/1	L91	01/04/2022	Sindora	P06/1	48	01/04/2022	Complied
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<b>Criterion 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.															
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>Kulim (M) Berhad Agriculture Manual has been established to cover Replanting, roads drains Bridges culverts and fences, construction of estate building, manuring, harvesting, pruning and ablation, soil conservation, justification of chemical use, weed management, integrated pest management and plant diseases. There are 19 SOPs and 18 WI's covering all aspects of oil palm management. The related SOP namely Leaf and Soil Sampling Notes procedure was verified. New revised Agriculture Manual dated 31/10/17 was sighted under A07-02-Planting Terrace and A20 – Standard Operating Guidelines for Conversion of Oil Crop Other Than Oil Palm to Oil.</p> <p>All estates operate in accordance with the Agriculture Manual and standard operating procedures. The practices consistently monitored by estate operation management and estate inspectorate. The recommendations for improvements are given to maintain the sustainable practices.</p>	Complied												
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Foliar and soil sampling was carried out by Internal Agronomist from Agronomy Advisory and Services Department prior to the fertilizer recommendation for the next financial year. Leaf and soil nutrient analysis are commonly used in the diagnosis of fertilizer requirements in oil palms. The frequency for leaf sampling must be conducted every year while for soil analysis, the frequency is once in 4 years. The last soil analysis reports verified are as follows:</p> <table border="1" data-bbox="1039 1107 1879 1345"> <thead> <tr> <th>Estates</th> <th>Leaf sampling</th> <th>Soil analysis</th> </tr> </thead> <tbody> <tr> <td>Sindora</td> <td>08/11/2020 Report #FI/2020/11/37</td> <td>20/12/2018 Report #SI/1812/0306-0309</td> </tr> <tr> <td>REM</td> <td>24/01/2020 Report #LI/2001/PSK/0033-0036</td> <td>06/01/2021 Report #SI/2021/01/7</td> </tr> <tr> <td>Sg Papan</td> <td>07/09/2020 Report #FOLIAR/1/2020</td> <td>01/10/2019 Report #SI/1910/0329-0332</td> </tr> </tbody> </table>	Estates	Leaf sampling	Soil analysis	Sindora	08/11/2020 Report #FI/2020/11/37	20/12/2018 Report #SI/1812/0306-0309	REM	24/01/2020 Report #LI/2001/PSK/0033-0036	06/01/2021 Report #SI/2021/01/7	Sg Papan	07/09/2020 Report #FOLIAR/1/2020	01/10/2019 Report #SI/1910/0329-0332	Complied
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		Basir Ismail	07/03/2021 Report #FI/2021/03/36	11/03/2021 Report #SI/2021/03/06																																																									
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 -	EFB, POME and bio-compost were applied as per agricultural manual: 1) D05: EFB Utilization at rate 50mt/ha. 2) D08: Bio-compost application at the rate of 7mt/ha or 50kg/palm on selected area.  Records of application were maintained by the estates and made available for verification. Among the information available in the records is field number, quantity of EFB being applied (mt) and date of application.				Complied																																																							
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	Records of fertiliser input were well maintained in various documents such as store issuance record, bin cards and month end account to name a few. Among the information available in the records was type of fertiliser, quantity and field number applied including date of application. Based on sampled fields, the amount of fertilisers issued out (i.e. applied) from the store according to J.D. Edwards software system was tally with the recommendations by agronomist, for all the sampled estates.				Complied																																																							
<b>Criterion 7.5:</b> Practices minimise and control erosion and degradation of soils.																																																													
7.5.1	<b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	The main soil series (in %) in the estates based on the soil maps which were sourced from the Department of Agriculture, are as follows: <table border="1" data-bbox="1034 1034 1944 1396"> <thead> <tr> <th>Soil series</th> <th>Sindora</th> <th>REM</th> <th>Sg Papan</th> <th>Basir Ismail</th> </tr> </thead> <tbody> <tr> <td>Kompleks Aluvium Setempat</td> <td></td> <td>4.16</td> <td>2.01</td> <td></td> </tr> <tr> <td>Kompleks Aluvium Sungai</td> <td>4.48</td> <td>6.99</td> <td></td> <td></td> </tr> <tr> <td>Kompleks Lempung Organik</td> <td></td> <td>14.85</td> <td></td> <td></td> </tr> <tr> <td>Harimau</td> <td></td> <td>27.06</td> <td></td> <td>4.97</td> </tr> <tr> <td>Holyrood</td> <td></td> <td>17.64</td> <td>1.34</td> <td>1.97</td> </tr> <tr> <td>Lunas</td> <td></td> <td>11.10</td> <td></td> <td></td> </tr> <tr> <td>Rengam</td> <td>93.20</td> <td>11.94</td> <td>18.52</td> <td>15.23</td> </tr> <tr> <td>Tampoi</td> <td></td> <td>6.26</td> <td></td> <td></td> </tr> <tr> <td>Batu Lapan</td> <td></td> <td></td> <td>2.11</td> <td></td> </tr> <tr> <td>Bungor</td> <td></td> <td></td> <td>46.57</td> <td>1.34</td> </tr> </tbody> </table>			Soil series	Sindora	REM	Sg Papan	Basir Ismail	Kompleks Aluvium Setempat		4.16	2.01		Kompleks Aluvium Sungai	4.48	6.99			Kompleks Lempung Organik		14.85			Harimau		27.06		4.97	Holyrood		17.64	1.34	1.97	Lunas		11.10			Rengam	93.20	11.94	18.52	15.23	Tampoi		6.26			Batu Lapan			2.11		Bungor			46.57	1.34		Complied
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		<table border="1"> <tbody> <tr><td>Keranji</td><td></td><td></td><td>1.12</td><td>4.08</td></tr> <tr><td>Lanchang</td><td></td><td></td><td>5.71</td><td></td></tr> <tr><td>Pelepah</td><td></td><td></td><td>2.14</td><td></td></tr> <tr><td>Sabrang</td><td></td><td></td><td>1.54</td><td></td></tr> <tr><td>Tai Tak</td><td></td><td></td><td>18.22</td><td>6.77</td></tr> <tr><td>Rengam-Bungor</td><td></td><td></td><td></td><td>45.71</td></tr> <tr><td>Batang Merbau</td><td></td><td></td><td></td><td>1.98</td></tr> <tr><td>Lintang</td><td></td><td></td><td></td><td>1.33</td></tr> <tr><td>Medang</td><td></td><td></td><td></td><td>1.17</td></tr> <tr><td>Tawar</td><td></td><td></td><td></td><td>6.08</td></tr> <tr><td>Tebok</td><td></td><td></td><td></td><td>2.20</td></tr> <tr><td>Tok Yong</td><td></td><td></td><td></td><td>1.57</td></tr> <tr><td>Ulu Tiram</td><td></td><td></td><td></td><td>2.90</td></tr> </tbody> </table>	Keranji			1.12	4.08	Lanchang			5.71		Pelepah			2.14		Sabrang			1.54		Tai Tak			18.22	6.77	Rengam-Bungor				45.71	Batang Merbau				1.98	Lintang				1.33	Medang				1.17	Tawar				6.08	Tebok				2.20	Tok Yong				1.57	Ulu Tiram				2.90	
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		There were no problematic or marginal soils in the sampled estates.																																																																		
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 -	Based on site visits and verification of slope maps, there was no evidence of replanting on slope area greater than 25°.			Complied																																																															
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No new planting at all the sampled estates.			Complied																																																															
<b>Criterion 7.6:</b> 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	<b>(C)</b> 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 -	Soil surveys are made and available in a soil map for all the estates. Topographic contour maps are also available which are both used to manage the drainage and road works in the estates. All the sampled estates in the CU have no new planting since the last visit.			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 the soil map and agronomist report, there is no soil categorised as marginal and fragile soils at all the sampled estates.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil surveys and topographic information was available in soil analysis report, soil maps and topography map. Should there be any planning of construction of drainage and irrigation systems, roads and other infrastructure, the information will be used as part of the guidance.	Complied
<b>Criterion 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil in all sampled estates. There was also no new planting in the estates. Thus, this indicator is not applicable.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. <b>PROCEDURAL NOTE:</b> 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). - Minor compliance -	There is no peat soil or soil categorized as marginal or fragile soil in all sampled estates. There was also no new planting in the estates. Thus, this indicator is not applicable.	Not Applicable
7.7.3	<b>(C)</b> Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil in all sampled estates. There was also no new planting in the estates. Thus, this indicator is not applicable.	Not Applicable
7.7.4	<b>(C)</b> A documented water and ground cover management programme is in place. - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil in all sampled estates. There was also no new planting in the estates. Thus, this indicator is not applicable.	Not Applicable

<p>7.7.5</p>	<p><b>(C)</b> 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. 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>	<p>There is no peat soil or soil categorized as marginal or fragile soil in all sampled estates. There was also no new planting in the estates. Thus, this indicator is not applicable.</p>	<p>Not Applicable</p>
<p>7.7.6</p>	<p><b>(C)</b> 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>	<p>There is no peat soil or soil categorized as marginal or fragile soil in all sampled estates. There was also no new planting in the estates. Thus, this indicator is not applicable.</p>	<p>Not Applicable</p>
<p>7.7.7</p>	<p><b>(C)</b> 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>There is no peat soil or soil categorized as marginal or fragile soil in all sampled estates. There was also no new planting in the estates. Thus, this indicator is not applicable.</p>	<p>Not Applicable</p>

	- Critical (Major) compliance -				
<b>Criterion 7.8:</b> Practices maintain the quality and availability of surface and groundwater.					
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> <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 management and action plans at all the sampled estates and mill for year 2021 were available. Among the objectives of the management plan are:</p> <p>i) Pollution prevention of surface and underground water sources</p> <p>ii) Maintain the availability of water source especially during draught season</p> <p>The mill collected water samples for the domestic water consumption collected by SPAN twice a year. All results were made available for verification. The analysis was conducted by an accredited laboratory (SMM No. 146). Based on the reports, the results were within the standard limits under the Drinking Water Quality Standard, MOH 2010.</p> <p>The water quality of outgoing waters to identify any adverse effect from the mill and estate activities were monitored. The mill and estate water management plans have been established with the recent review made on 01/08/2021. Field operation covered: Spraying &amp; Manuring, Drain Maintenance, cleaning process, Replanting and nursery, Line site.</p>	Complied		
7.8.2	<p><b>(C)</b> 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>Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. Riparian buffer zones have been identified and demarcated. White and blue stripe marker poles were erected. No chemicals and fertilizer application observed been used in their maintenance. In some areas Guatemala grass were planted along the riverbanks. The guidelines are detailed in the SOP No A17: Protection of Natural of Water Course. The buffer zones established are as follows: -</p> <table border="1" data-bbox="1041 1241 1803 1348"> <tr> <td>River width (meter)</td> <td>Minimum width for river reserve (m) for peninsular Malaysia and Sarawak</td> </tr> </table>	River width (meter)	Minimum width for river reserve (m) for peninsular Malaysia and Sarawak	Complied
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		<table border="1"> <tr> <td>1-5</td> <td>5</td> </tr> <tr> <td>5-10</td> <td>10</td> </tr> <tr> <td>10-20</td> <td>20</td> </tr> <tr> <td>20-40</td> <td>40</td> </tr> <tr> <td>&gt;40</td> <td>50</td> </tr> </table> <p>All estates monitored river water entering and exiting their property. Water sampling for Nitrate Nitrogen and Phosphate was done in months when fertilisers were applied. Analysis was assigned to UTCL Laboratory, Kota Tinggi.</p> <p><u>Basir Ismail Estate</u></p> <ul style="list-style-type: none"> <li>• Date of report: 10/01/2022</li> <li>• Report No: W1/2022/01/015</li> <li>• Date Tested; 23/12/2021 to 03/01/2022</li> <li>• Sample point: W1-1421-Inlet Sg Redan, W1-1422-Outlet Sg Redan, W1-1423-Inlet Sg Serai, W1-1424-Outlet Sg Serai, W1-1425-Outlet Sg Air Putih</li> </ul> <p><u>Ulu Tiram Estate</u></p> <ul style="list-style-type: none"> <li>• Date of report: 21/10/2021</li> <li>• Report No: W1/2021/10/497</li> <li>• Date Tested; 11/10/2021 to 18/10/2021</li> <li>• Sample point: W1-1505 A In let, WI-1506 B Outlet</li> </ul> <p><u>REM Estate</u></p> <ul style="list-style-type: none"> <li>• Date of report: 03/11/2021</li> <li>• Report No: W1/2021/11/532</li> <li>• Date Tested; 01/11/2021 to 02/11/2021</li> </ul>	1-5	5	5-10	10	10-20	20	20-40	40	>40	50	
1-5	5												
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		<ul style="list-style-type: none"> <li>• Sample point: W1-1608 In let, WI-1609 Outlet</li> </ul> <p><u>Sg Papan Estate</u></p> <ul style="list-style-type: none"> <li>• Date of report: 20/03/2022</li> <li>• Report No: W1/2022/03/085</li> <li>• Date Tested; 17/03/2022 to 02/11/2021</li> <li>• Sample point: W1-1608 In let, WI-1609 Outlet</li> </ul> <p><u>Sindora Estate</u></p> <ul style="list-style-type: none"> <li>• Date of report: 21/01/2022</li> <li>• Report No: W1/2022/01/34</li> <li>• Date Tested; 19/01/20222 to 20/01/2022</li> <li>• Sample point: W1-0075 In let, WI-0076 Outlet</li> </ul> <p>For Mill, sighted Water Test Report. Refer Report Number WI/2021/08/396 dated 24/08/2021, WI/2021/09/431 dated 16/09/2021 and WI/2021/10/493 dated 12/10/2021.</p>	
7.8.3	<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.</p> <p>- Minor compliance -</p>	<p>The mill applies the biological system with ponds in series for its treatment of effluent. The mill is disposing its effluent to land application and compost. The quality of discharged effluent was analysed every month an accredited laboratory (SAMM No. 307) and the parameters are T, pH, BOD, COD, TS, SS, O&amp;G, AN and TN. The last 12 months results were verified where all the BOD results were within the regulated limit.</p> <p>The effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No overflow was observed, and flow meter reading was recorded daily.</p> <p>Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. Effluent Analysis conducted by accredited laboratory, Mahamurni Plantations Sdn Bhd and submitted to DOE every 3</p>	Complied

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		<p>months through OER (Online Environmental Report) and in compliance with mill's compliance schedule for quarterly submission. Refer to the latest report for dated January 2022. Monthly analysis was done for final discharge point. Total of 8 parameters (pH, BOD3, COD, TS, SS, TN, AN and O&amp;G) were tested. Latest analysis report for October, November and December 2021 were verified. Sample of 4<sup>th</sup> Quarter 2021 sample were verified:</p> <table border="1" data-bbox="1039 564 1818 788"> <thead> <tr> <th>Report Date</th> <th>Report No.</th> <th>BOD (Limit=100mg/L)</th> </tr> </thead> <tbody> <tr> <td>20/12/2021</td> <td>EI/2021/12/224</td> <td>23</td> </tr> <tr> <td>29/11/2021</td> <td>EI/2021/11/208</td> <td>27</td> </tr> <tr> <td>20/10/2021</td> <td>EI/2021/10/189</td> <td>13</td> </tr> </tbody> </table> <p>Environmental Compliance Audit from 3<sup>rd</sup> party has been conducted on 20/01/2022 by Shahrul Rizal Bin Abdul Rahman, Auditor EA0103/CESSWI4063). Report reference number AS(B)J31/152/000/075-09/2022.</p>	Report Date	Report No.	BOD (Limit=100mg/L)	20/12/2021	EI/2021/12/224	23	29/11/2021	EI/2021/11/208	27	20/10/2021	EI/2021/10/189	13	
Report Date	Report No.	BOD (Limit=100mg/L)													
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20/10/2021	EI/2021/10/189	13													
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.                      - Minor compliance -</p>	<p>The mill processing water is obtained from a water catchment adjacent to the mill complex. The water usage monitoring is made monthly. Based on the records, the water consumption of the mill is as follows:</p> <ul style="list-style-type: none"> <li>- Year 2021: 0.89 m3/mt FFB processed as at September</li> <li>- Year 2020: 0.32 m3/mt FFB processed</li> </ul> <p>Mill has maintained monitoring of water usage for processing FFB which are recorded monthly. Water for processing is abstracted from water catchment by using pump. The trend of water usage is tandem with volume of FFB process. Refer Water Usage Record Sindora POM. Average data as below:</p> <table border="1" data-bbox="1039 1286 1818 1362"> <thead> <tr> <th>Year</th> <th>FFB Processed</th> <th>Water/L</th> <th>Water/FFB</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Year	FFB Processed	Water/L	Water/FFB					Complied				
Year	FFB Processed	Water/L	Water/FFB												

		Year 2021	234,100.05	200,432.00	0.86																																									
<b>Criterion 7.9:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised																																														
7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2021. The document was reviewed/updated on Jan 2021. The estates and mill record and monitor the diesel utilization over the running hours of generator set and other vehicles running. Performance variation in view of several factors i.e.</p> <ul style="list-style-type: none"> <li>- Infrastructure of estates</li> <li>- Community size/no of gen-sets</li> <li>- No. of vehicles/age of machine</li> <li>- Weather interference/crop production volume</li> </ul> <p>The utilisation of fibre and shell by the mill as biofuel for boiler operation is consistently implemented to generate electricity through turbines. This helps to reduce the dependency to fossil fuel.</p> <p>The diesel utilisation for the mill and estates is provided in the below table.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="4">Year 2021</th> </tr> <tr> <th>Site</th> <th>Diesel/L</th> <th>FFB Processed, MT</th> <th>Diesel/FFB</th> </tr> </thead> <tbody> <tr> <td>Sindora POM</td> <td>187640</td> <td>234,100.05</td> <td>0.80</td> </tr> </tbody> </table> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="4">Year 2021</th> </tr> <tr> <th>Estate</th> <th>Diesel</th> <th>FFB</th> <th>Diesel/FFB</th> </tr> </thead> <tbody> <tr> <td>Basir Ismail</td> <td>153,500.74</td> <td>63,595.94</td> <td>2.41</td> </tr> <tr> <td>Ulu Tiram</td> <td>6,236.00</td> <td>9,641.54</td> <td>0.65</td> </tr> <tr> <td>REM</td> <td>74,404.00</td> <td>28,877.55</td> <td>2.58</td> </tr> <tr> <td>Sg Papan</td> <td>46,552.00</td> <td>68,193.20</td> <td>0.68</td> </tr> <tr> <td>Sindora</td> <td>69630.00</td> <td>65,941.65</td> <td>1.57</td> </tr> </tbody> </table>				Year 2021				Site	Diesel/L	FFB Processed, MT	Diesel/FFB	Sindora POM	187640	234,100.05	0.80	Year 2021				Estate	Diesel	FFB	Diesel/FFB	Basir Ismail	153,500.74	63,595.94	2.41	Ulu Tiram	6,236.00	9,641.54	0.65	REM	74,404.00	28,877.55	2.58	Sg Papan	46,552.00	68,193.20	0.68	Sindora	69630.00	65,941.65	1.57	Complied
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		<p>Renewable energy was sighted on the usage of fibre and shell for boiler operation to generate steam for operation.</p> <table border="1"> <thead> <tr> <th></th> <th colspan="3">Jan – Dec 2021</th> </tr> <tr> <th></th> <th>Produce</th> <th>FFB Processed</th> <th>% Fiber to FFB</th> </tr> </thead> <tbody> <tr> <td>Shell</td> <td>15,420.60</td> <td>234,100.05</td> <td>6.59</td> </tr> <tr> <td>Fibre</td> <td>30,988.71</td> <td>234,100.05</td> <td>13.24</td> </tr> </tbody> </table>		Jan – Dec 2021				Produce	FFB Processed	% Fiber to FFB	Shell	15,420.60	234,100.05	6.59	Fibre	30,988.71	234,100.05	13.24	
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<p><b>Criterion 7.10:</b> 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><b>(C)</b> 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>Main sources of GHG emission identified were methane (CH) emission through POME treatment and boiler stack from the mill. Other less significant GHG emissions identified including CO, SOx and NOx from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities.</p> <p>The emission value is recorded and calculated through the utilisation of RSPO’s Palm GHG Calculator ver. 4.</p> <p>Based on verification of various records such as store issuance records and computerised accounting system, all the data was found to be accurate.</p>	Complied																
7.10.2	<p><b>(C)</b> 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>NA as there is no new development after 2014 by the certification unit.</p>	Not Applicable																
7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p>	<p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate/soot emissions and effluent. The CU has continued to maintain its environmental aspect &amp; impact register</p>	Complied																



	<p>- Critical (Major) compliance -</p>	<p>associated with their activities. Environmental aspect and impact (EAI) records i.e. which covers estates and mill activities/operation. 'Pollution Identification Environmental Improvement Action Plan' is established to identify the waste products and sources of pollution and outlined the action to be taken in order to minimise the risk of pollution.</p> <p>Assessment of all polluting activities was conducted under Environmental Risk Assessment for identifying activities that contributes significant impact to environment including gaseous emission.</p> <p>As prescribed under DOE's Compliance Schedule, the mill is obliged to conduct stack sampling minimum. Continuous Emissions Monitoring System (CEMS) which link to the DOE on real time base were in used for Dark smoke emissions monitoring process.</p> <p>Sighted Ambient Air Quality Monitoring Report as below:</p> <p><u>2<sup>nd</sup> half 2021</u></p> <ul style="list-style-type: none"> <li>• Boiler No: 4</li> <li>• Report no.: PAC-AE-220118</li> <li>• Report date: 25/01/2022</li> <li>• Result: Dust: 80 mg/m3 (B5) vs limit 150, CO: 964 mg/m3 vs limit 1000 @ 12% CO2</li> </ul> <p><u>1<sup>st</sup> half 2021</u></p> <ul style="list-style-type: none"> <li>• Boiler No: 4</li> <li>• Report no.: PAC-AE-210513</li> <li>• Report date: 19/05/2021</li> <li>• Result: Dust: 130 mg/m3 (B5) vs limit 150, CO: 843 mg/m3 vs limit 1000 @ 12% CO2</li> </ul> <p>Continuous Emissions Monitoring System (CEMS) which link to the DOE on real time base were in used for Dark smoke emissions monitoring process.</p>	
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		Sighted Online Environmental Reporting (OER) has been submitted to DOE on quarterly basis. The result within parameter as per Jadwal Pematuhan AS(B)J31/152/000/075 with licence number 004718.	
<b>Criterion 7.11:</b> Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<b>(C)</b> Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	There was no new planting and replanting which prepared by burning and in lined with Sustainability handbook has described therein on Environmental Policy (signed by the Executive Director) to include the adoption of Zero Open Burning Policy dated January 2008.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	Procedure on fire prevention has been established. Refer Prosedur Kerja Selamat – Prosedur Pencegahan Dan Kawalan Kebakaran dated 01/08/2020. Fire prevention team was established. Awareness training on ERP has been conducted.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	Management has communicated on fire prevention and control measures with their stakeholders during various channel which is stakeholder meeting, training, and campaign. For Basir Ismail Estate, the communication with stakeholders through stakeholder meeting dated 20/10/2021. For Ulu Tiram Estate, engagement with adjacent stakeholders was done during Online Stakeholder Meeting dated 27/10/2021. For REM Estate, engagement with adjacent stakeholders was done during Online Stakeholder Meeting dated 18/10/2021. For Sindora Estate, engagement with adjacent stakeholders was done during Online Stakeholder Meeting dated 12/10/2021.	Complied
<b>Criterion 7.12:</b> 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	<b>(C)</b> 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.	NA as no new development within Sindora POM certification unit.	Not Applicable

	<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>		
<p>7.12.2</p>	<p><b>(C)</b> 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><b>PROCEDURAL NOTE:</b>          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>The latest assessment conducted was in January 2008 reviewed in Feb 2013 for Sindora Complex Supply Base Estates respectively. The assessment was conducted by A.J.F.M Dekker. Exception for Sindora Estate for which the assessment was reviewed in August 2016 by M/s Malaysian Environmental Consultant Sdn Bhd. Sg Papan Estate HCV assessment was made in July 2009. Both the assessments were made in relation to the Rapid Biodiversity Assessment. Both the reports have identified the list of natural habitats that is possible present in the operating units. The reports detail the findings of a rapid appraisal of the biodiversity in the estates and address the RSPO P&amp;C relevant to biodiversity conservation and HCV. Therein being provided details relating to the following:</p> <ul style="list-style-type: none"> <li>• General biodiversity issues</li> <li>• Watercourses and drainage</li> <li>• Habitats natural and man-made</li> <li>• Wildlife</li> <li>• Ponds and reservoirs</li> <li>• Wetlands /watercourses</li> <li>• Legal aspects</li> <li>• Immediate and long-term effect.</li> </ul> <p>In all the estates within the Sindora Complex Supply Base there is HCV habitat within and outside the estates. There is no primary forest present at any of the estates.</p> <p>The recent HCV assessment methodology is through site observation, interviews, stakeholder’s consultation and desktop review on available secondary data. The assessment among others covers the following areas:</p>	<p>Complied</p>

		<p>a) Overview of HCV assessment.          b) Description of assessment areas.          c) Finding and discussion</p> <ul style="list-style-type: none"> <li>- landscape context</li> <li>- HCV criteria and application to agriculture</li> <li>- HCV monitoring and management</li> </ul> <p>The Rapid Biodiversity Assessment of Fifteen Oil Palm Plantations of Kulim (M) Berhad Final Report February 2013 (Compiled from unchanged draft of January 2008) dated 28/02/2013. HCV was conducted by A.J.F.M Dekker (RSPO Assessor, HCV/Biodiversity) was available for verification.</p> <p>For Ulu Tiram Estate, HCV assessment conducted by Malaysian Environmental Consultant Sdn Bhd (Expertise in Natural Resource Management &amp; Sustainability) dated August 2016.</p> <p>Sample of Biodiversity Improvement Plan 2021 for Sindora Estate:</p> <p>Immediate Action</p> <ul style="list-style-type: none"> <li>• To record animal sighting into animal sighting record and to be sent to SPOD monthly.</li> <li>• To record elephant movement in the field, water catchment areas (BAKAJ) and estate boundary.</li> <li>• SPO department will organized Bird survey at the respective operating unit.</li> <li>• Targeted hunting of bird species by estate workers or local community for food &amp; reaction.</li> </ul> <p>Long term strategies</p> <ul style="list-style-type: none"> <li>• To maintain buffer zone peg at buffer zone areas</li> <li>• To have erosion prevention and road maintenance program</li> <li>• To map the bare area, Guatemala planting, vertivar planting, road maintenance, culvert and road side drain maintenance program.</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Ensure SOP to minimise threat from estate activities – spraying, manuring</li> <li>• To record treats, fire, flood and disturbance for monitoring.</li> <li>• Wildlife roadkill to adequate training and supervision of drivers for road safety.</li> </ul>	
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	NA	Not Applicable
7.12.4	<p><b>(C)</b> 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).</p> <p>- Critical (Major) compliance -</p>	<p>The recent HCV assessment methodology is through site observation, interviews, stakeholder’s consultation and desktop review on available secondary data. The assessment among others covers the following areas:</p> <ol style="list-style-type: none"> <li>Overview of HCV assessment.</li> <li>Description of assessment areas.</li> <li>Finding and discussion               <ul style="list-style-type: none"> <li>- landscape context</li> <li>- HCV criteria and application to agriculture</li> </ul> </li> <li>HCV monitoring and management</li> </ol> <p>Monitoring of the HVC areas is done through daily field supervision by the field staff, apart from visits by the PI/GM and the SQD unit. Records of monitoring were made available for verification by the sampled estates.</p> <p>Based on the report, there was no HCV or RTE presence in the plantation. Nonetheless, Sindora complex estate has its own self-declared conservation areas.</p> <p>Biodiversity Improvement Plan has been established at each sample estates. The management plan has included short-term and long-term plan. Among details in the plan as below:</p> <p>Short Term Plan</p> <ol style="list-style-type: none"> <li>1. RTE Species sighting record and training</li> <li>2. Erosion control and risk checking</li> <li>3. SQD Department to organize Bird Survey at respective unit</li> </ol>	Complied

		<p>Long Term Plan</p> <ol style="list-style-type: none"> <li>1. Buffer zone establishment and training</li> <li>2. Restore the natural vegetation from monitoring and training</li> <li>3. Wildlife and Habitats protection of flora and fauna.</li> </ol> <p>Regular security patrol and sighting within the estate was carried out and finding/issue recorded by the respective estate personal/security to monitor the conservation / buffer zone areas. Monitoring and control of any illegal hunting, fishing or collecting activities was also implemented. Signage that prohibit hunting and water polluting activities were verified on-site found to be satisfactorily maintained.</p>	
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.</p> <p>- Minor compliance -</p>	<p>No local communities have been identified in self-declared HCV areas within sampling Estate.</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.</p> <p>- Minor compliance -</p>	<p>There is evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities. Signage as well as routine patrolling activities were carried out as part of the efforts to create awareness among employees about biodiversity. Apart from that, briefing during muster was also carried out from time to time.</p> <p>Although there is no RTE species identified at Sample Estates, there is evidence to continuously prevent and discourage illegal or hunting, fishing, or collecting activities. Signage as well as routine patrolling activities were carried out as part of the efforts to create awareness among employees about biodiversity.</p> <p>Sighted evidence of prohibiting of illegal hunting signage at sample estates. Verified through interview of workers found they have good awareness on it.</p>	Complied

		<p>HCV and Biodiversity Training has been conducted</p> <p>Basir Ismail Estate: 14/01/2021</p> <p>Ulu Tiram Estate: 10/08/2021</p> <p>REM Estate: 05/07/2021</p> <p>Animal sighting has been recorded at sampled estates. Latest record on December 2021 was available for verification.</p>	
7.12.7	<p>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.</p> <p>- Minor compliance -</p>	<p>The HCV management plan is developed based on recommendation given by the assessor dated 01/08/2021 based on email date. The plan includes monitoring of buffer zone area and conservation area in the estate and surrounding area.</p> <p>Monitoring of action plan was carried out at appropriate frequency as a mechanism to ensure effectiveness of implementation. Report of the monitoring was adequately recorded by the person in-charge on daily basis. Based on the report, no RTE sighted and no evidence of encroachment/trespasses at the identified HCV and conservation area. Management plan as per 7.12.4.</p> <p>Checked daily patrolling and sighting reports confirm that there was no RTE species and illegal activities reported.</p>	Complied
7.12.8	<p><b>(C)</b> 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.</p> <p>- Critical (Major) compliance -</p>	<p>NA as no new development within Sindora POM certification unit.</p> <p>Verified that there is no land clearing without prior HCV assessment since November 2005 occurred at Sindora Complex.</p>	Not Applicable

**Appendix B: GHG Reporting Executive Summary**

The GHG emissions that were produced in 2020 for Sindora Palm Oil Mill 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 data 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 2020 for Sindora Palm Oil Mill and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	1.12
PKO	1.12

Extraction	%
OER	20.85
KER	5.11

Production	t/yr
FFB Processed	263,670.50
CPO Produced	54,970.83
PKO Produced	13,471.66

Land Use	Ha
OP Planted Area	18,293.33
OP Planted on peat	-
Conservation (forested)	14.01
Conservation (non-forested)	53.55
<b>Total</b>	<b>18,360.89</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	81,377.49	0.48	361.45	0.64	29,554.20	-	111,248.14	1.02
CO <sub>2</sub> Emission from fertilizer	6,306.48	0.04	26.51	0.05	1,460.77	-	7,793.76	0.09
NO <sub>2</sub> Emission from Peat	-	-	-	-	-	-	-	-
NO <sub>2</sub> Emission from Fertiliser	5,652.58	0.03	19.11	0.04	901.16	1.82	6,572.85	1.89
Fuel Consumption	932.64	0.01	4.67	0.01	248.83	-	1,186.15	0.02
Peat Oxidation	-	-	-	-	-	-	-	-
<b>Sink</b>								
Crop Sequestration	-76,753.35	-0.45	-299.95	-0.61	-19,859.76	-	-96,913.06	-1.06
Conservation Sequestration	-14.23	-	-1.56	-	-	-	-15.79	-
<b>Total</b>	<b>17,501.61</b>	<b>0.10</b>	<b>65.22</b>	<b>0.13</b>	<b>12,305.21</b>	0.00	29,872.05	0.23

\*Note: Includes both estates and smallholders



**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	49,602.38	0.19
Fuel Consumption	756.17	0
Grid Electricity Utilization	0	0
<b>Credit</b>		
Export of Grid Electricity	0	0
Sales of PKS	-3,776.23	-0.01
Sales of EFB	0	0
<b>Total</b>	<b>46,582.32</b>	<b>0.18</b>

**Summary of Kernel Crusher Emission and Credit (if applicable)**

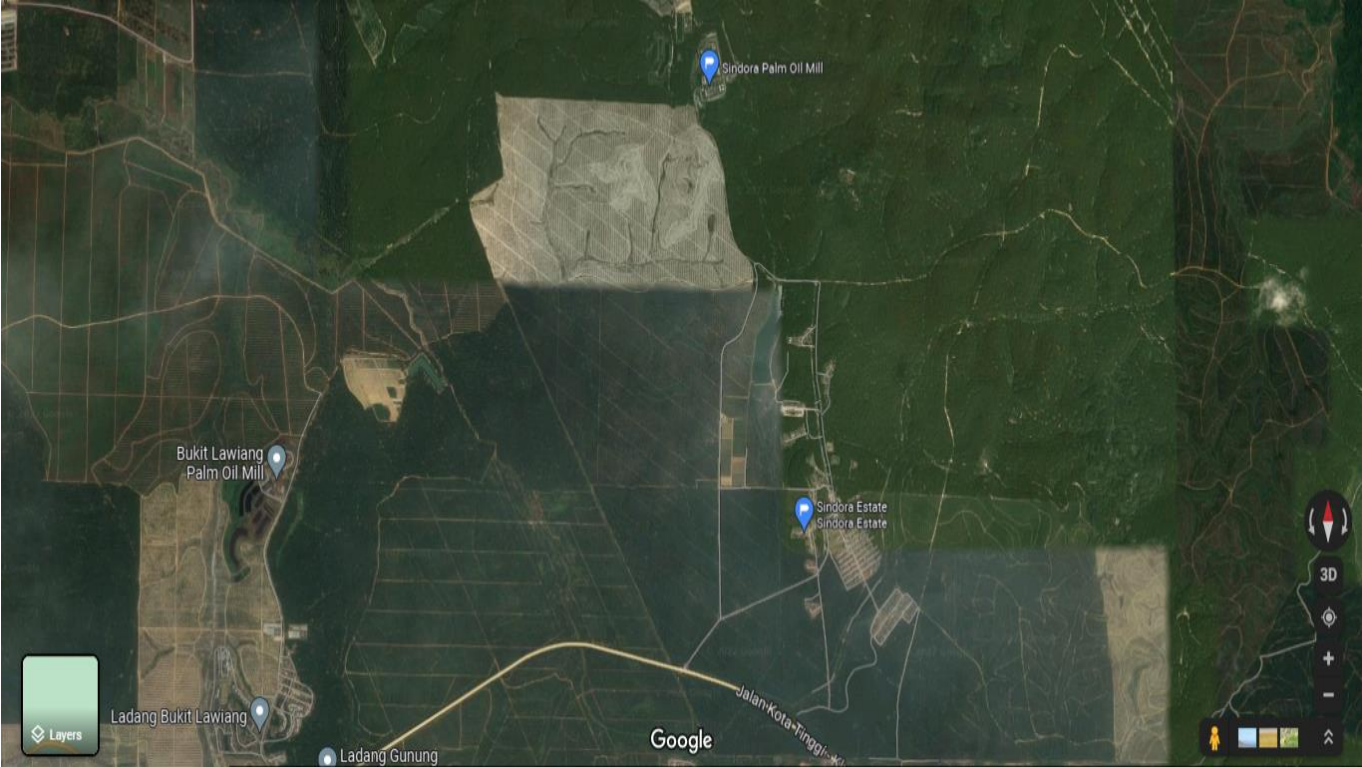
Emissions	tCO <sub>2</sub> e
PK from own mill	0
PK from other source	0
Fuel Consumptions	0
<b>Total Crusher emissions</b>	<b>0</b>

\*This mill has no kernel crusher operation.

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

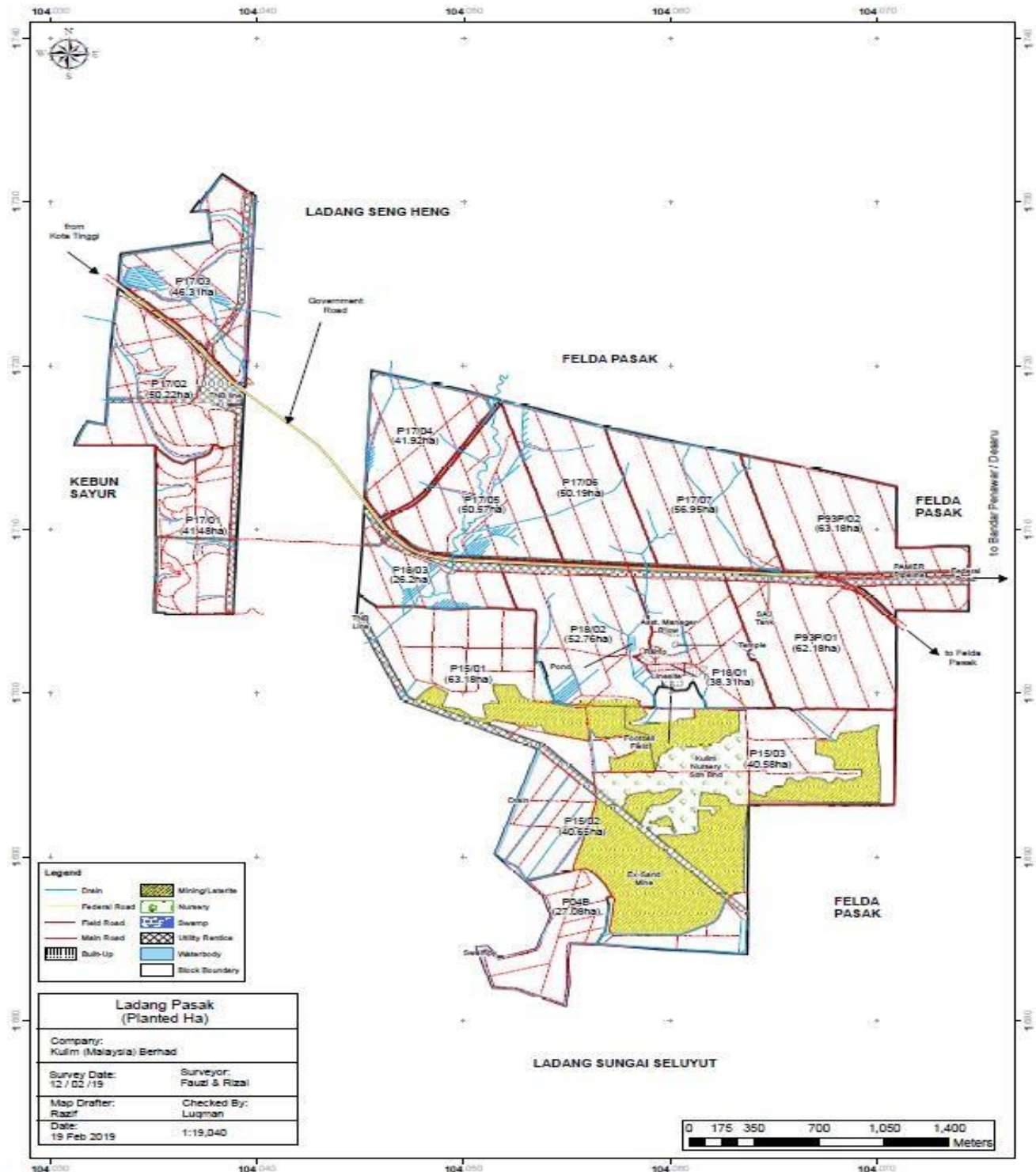
<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	-
Divert to methane captured (energy generation) (%)	-

**Appendix C: Location Map of Certification Unit and Supply bases**

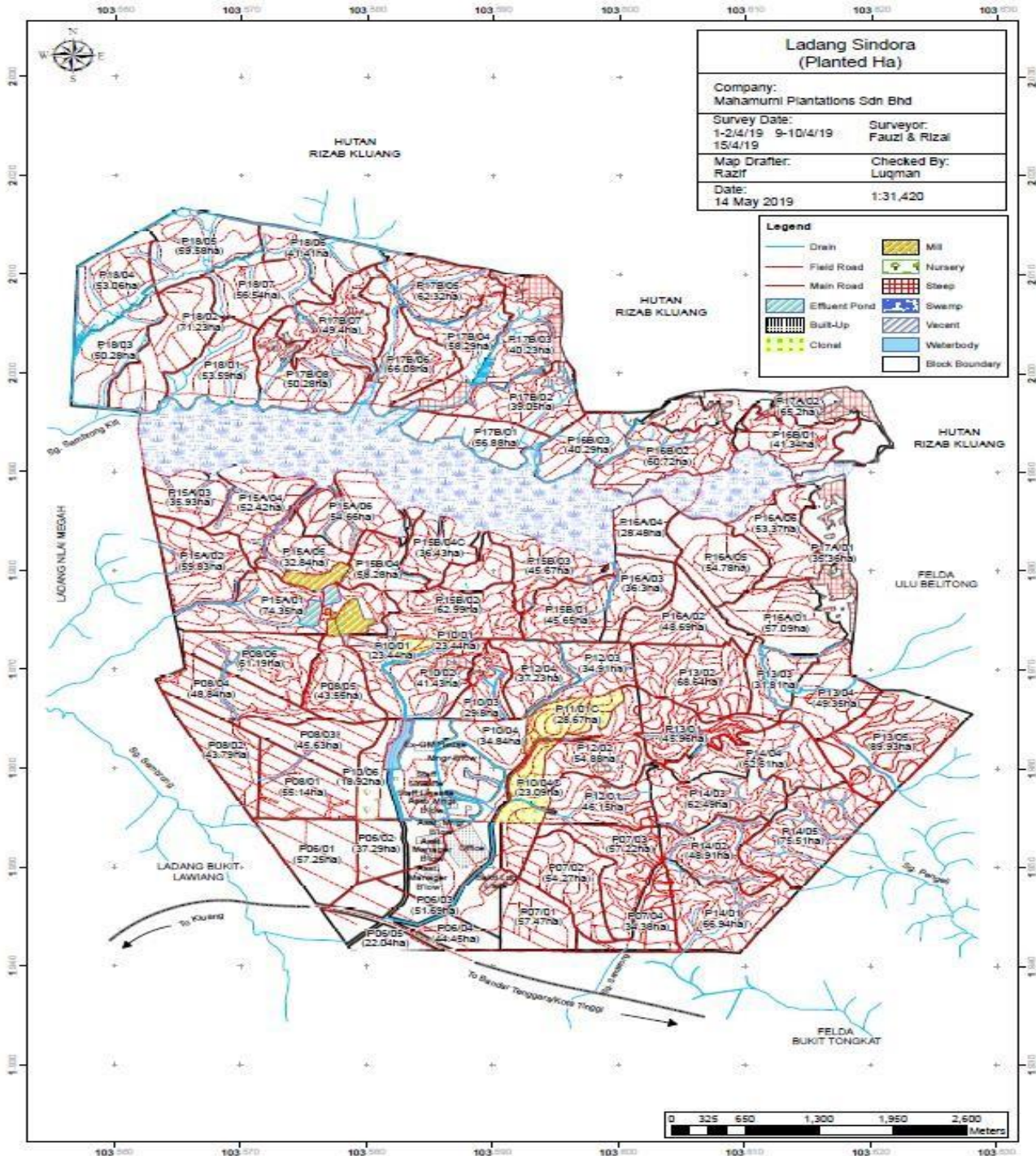


**Appendix D: Estate Field Map**

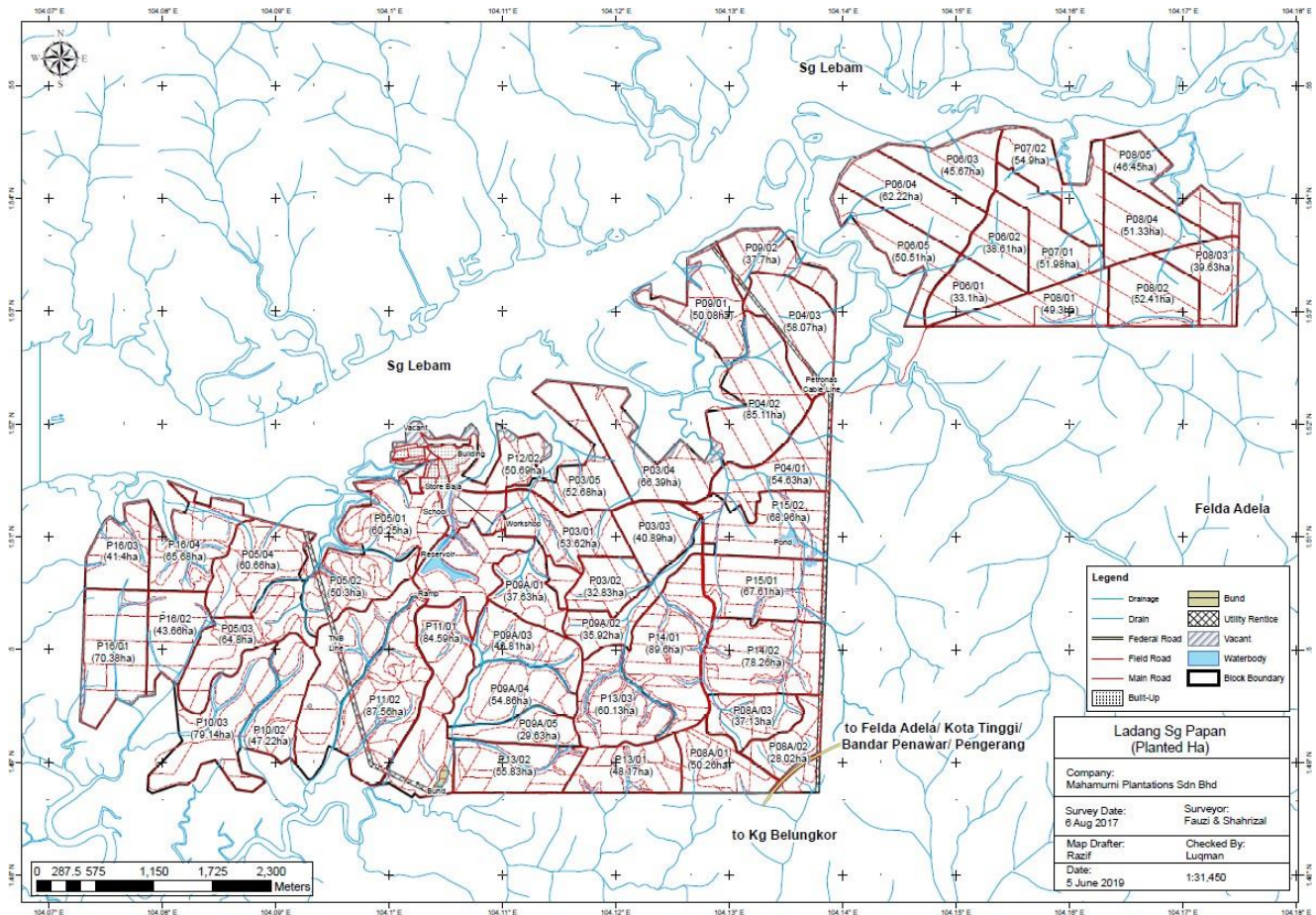
**REM Estate**



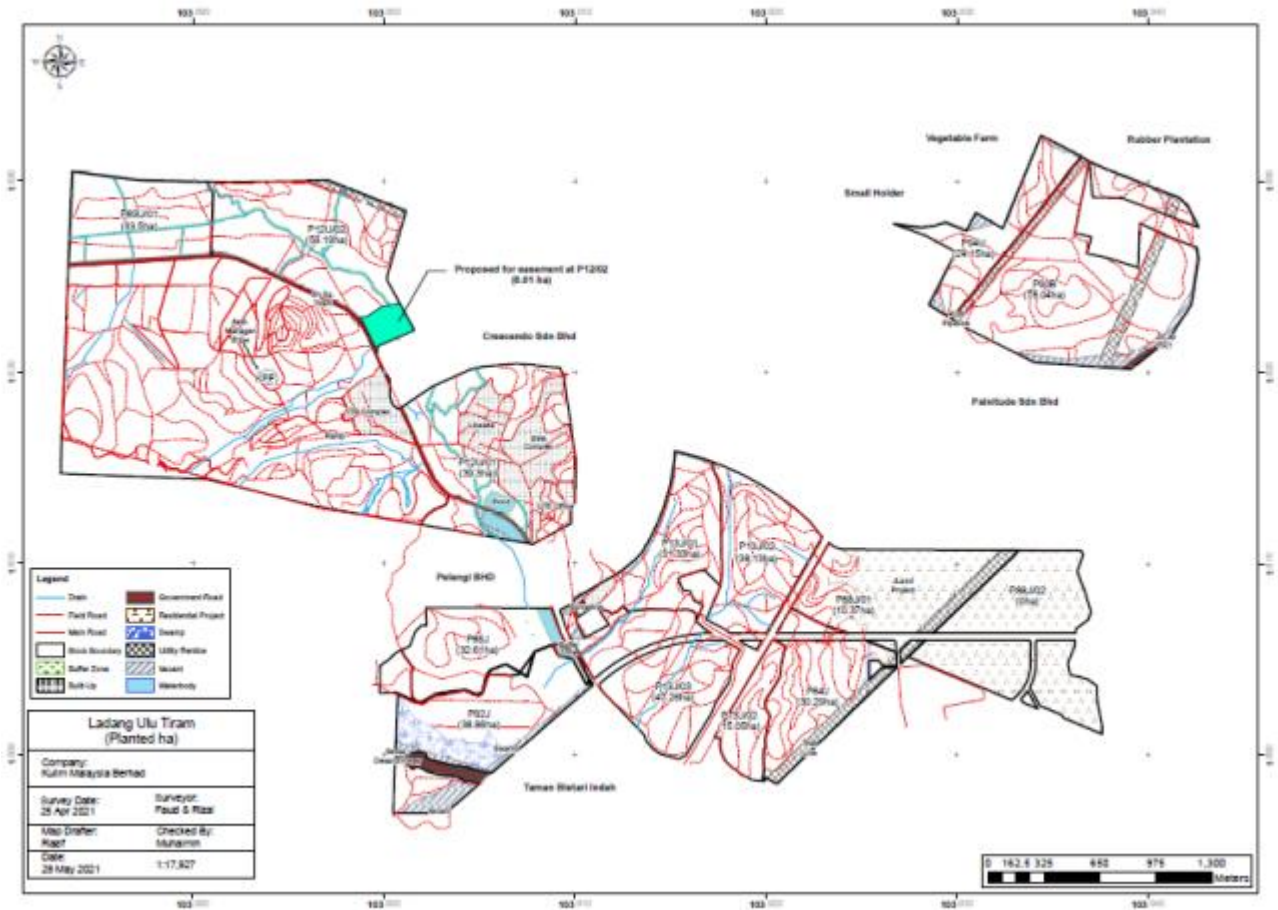
**Sindora Estate**



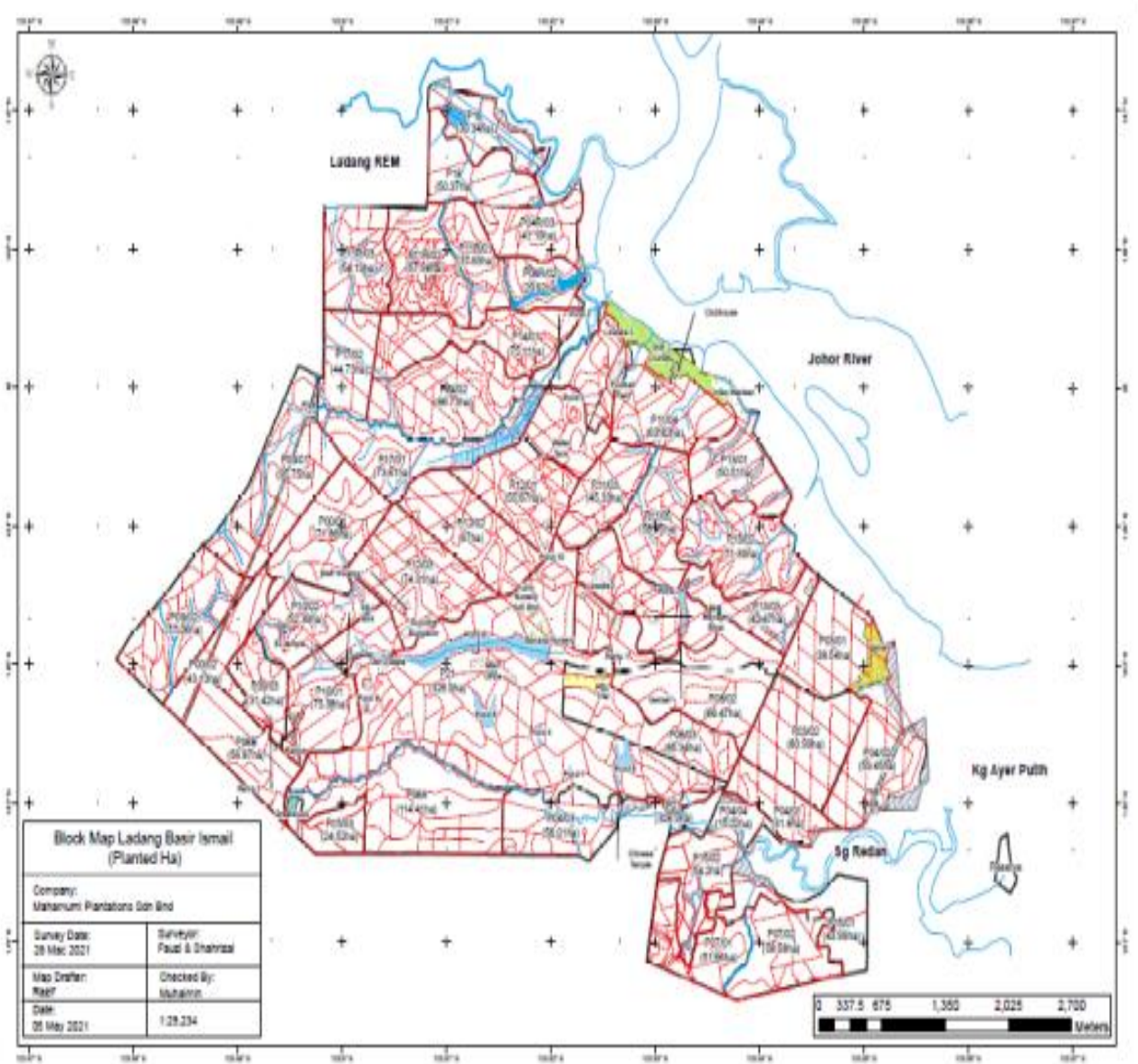
**Sg Papan Estate**



**Ulu Tiram Estate (Division of REM Estate)**



**Basir Ismail Estate**



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**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			
	NA								
<b>Total</b>									

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