

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

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

| |
|--|
| Client Company name (Parent Company): Johor Corporation |
| Client company Address: Level 16, Menara Komtar, Johor Bahru City Centre, 80000 Johor Bahru, Johor Darul Takzim, Malaysia |
| Certification Unit: Kulim (Malaysia) Berhad- Tereh Palm Oil Mill |
| Location of Certification Unit: Batu 26, Road Committee, Jalan Kampung Peta, Jalan Mersing, 86000 Kluang, Johor, Malaysia |
| Date of Final Report: 01/08/2022 |

TABLE of CONTENTS

Page No

| | |
|---|-------------------------------------|
| Section 1: Scope of the Assessment..... | 3 |
| 1. Company Details | 3 |
| 2. Certification Information | 3 |
| 3. Other Certifications..... | 4 |
| 4. Location(s) of Mill & Supply Bases | 4 |
| 5. Description of Supply Base | 5 |
| 6. Plantings & Cycle..... | 5 |
| 7. Summary of Certified Tonnage of FFB (Own Certified Scope) | 6 |
| 8. Summary of Certified Tonnage of FFB (from other certified unit(s)) | 6 |
| 9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)..... | 7 |
| 10. Summary of Certified Tonnage (not applicable for ISS) | 8 |
| 11. Summary of Actual Volume sold | Error! Bookmark not defined. |
| 12. Independent Smallholders Certified Tonnage / Volume | 10 |
| 13. Independent Smallholders Actual Sold Tonnage / Volume | 10 |
| Section 2: Assessment Process | 11 |
| 2.1 Assessment Methodology, Programme, Site Visits..... | 11 |
| 2.2 BSI Assessment Team | 12 |
| 2.3 Assessment Plan..... | 14 |
| Section 3: Assessment Findings | 19 |
| 3.1 Multiple Management Units and Time Bound Plan..... | 19 |
| 3.2 Progress of scheme smallholders and/or outgrowers..... | 20 |
| 3.3 Details of Nonconformities | 23 |
| 3.3.1 Status of Nonconformities Previously Identified and Observations..... | 28 |
| 3.3.2 Summary of the Nonconformities and Status | 29 |
| 3.4 Stakeholders and previous land owner / user consultation..... | 29 |
| 3.5 Impartiality and conflict of interest | 31 |
| Formal Signing-off of Assessment Conclusion and Recommendation | 32 |
| Appendix A: Summary of Findings | 33 |
| Appendix B: GHG Reporting Executive Summary | 152 |
| Appendix C: Location Map of Certification Unit and Supply bases..... | 156 |
| Appendix D: Estate Field Map..... | 157 |
| Appendix E: List of Smallholder Registered and sampled..... | 166 |
| Appendix F: List of Abbreviations..... | 167 |

Section 1: Scope of the Assessment

| 1. Company Details | | | |
|--|---|---------------------------------|--|
| Parent Company | Johor Corporation | | |
| RSPO Membership Number | 1-0080-09-000-00 | Membership Approval Date | 15/06/2009 |
| Address | Level 16, Menara Komtar, Johor Bahru City Centre, 80000 Johor Bahru, Johor Darul Takzim, Malaysia | | |
| Palm Oil Mill / Group Manager / Estate (Certification Unit) | Kulim (Malaysia) Berhad - Tereh Palm Oil Mill | | |
| Location / Address | Batu 26, Road Committee, Jalan Kampung Peta, Jalan Mersing, 86000 Kluang, Johor, Malaysia | | |
| Website | www.kulim.com.my | | |
| Management Representative | Salasah Elias | E-mail | salrasah@kulim.com.my |
| Telephone | 07-8611611 | Facsimile | 07-8631084 |

| 2. Certification Information | | | |
|---|---|--------------------------------|------------|
| Certificate Number | RSPO 613086 | Certificate Start Date | 23/01/2019 |
| Date of First Certification | 23/01/2009 | Certificate Expiry Date | 22/01/2024 |
| Scope of Certification | Production of Palm Oil and Palm Kernel | | |
| Visit Objectives | Determination of the conformity of the client's management system, or parts of it, with audit criteria and evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. Completed the 70% onsite assessment as continuation from 30% of remote assessment. | | |
| Assessment Cycle | <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 | | |
| Applicable Standards / Normative Reference | RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil | | |
| Supply Chain Module | <input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance | Mill Capacity | 60 mt/hour |
| ISH certification Phase | <input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable | | |

| 3. Other Certifications | | | |
|--------------------------------|--------------------|------------------------------|--------------------|
| Certificate Number | Standard(s) | Certificate Issued by | Expiry Date |
| EU-ISCC-Cert-PL214-20230521 | ISCC | ASG Cert GmbH | 16/06/2023 |
| A158823 | HALAL MS 1500:2009 | JAKIM | 15/09/2023 |
| MSPO 698004 | MS 2530-4:2013 | BSI Services (M) Sdn. Bhd. | 01/04/2024 |
| MSPO 698005 | MS 2530-3:2013 | BSI Services (M) Sdn. Bhd. | 01/04/2024 |
| BVC-MSPO/SC-0029 | MSPO SCCS | Bureau Veritas | 10/03/2025 |

| 4. Location(s) of Mill & Supply Bases | | | |
|---|---|------------------------|-------------------|
| Name (Mill / Supply Base / Group Manager / Smallholders) | Location | GPS Coordinates | |
| | | Latitude | Longitude |
| Tereh Palm Oil Mill | Batu 26, Road Committee, Jalan Kampung Peta, Jalan Mersing, 86000 Kluang, Johor Darul Takzim. | 2° 13' 03.06" N | 103° 21' 05.00" E |
| Tereh Utara Estate | Batu 26, Road Committee, Jalan Kampung Peta, Jalan Mersing, 86000 Kluang, Johor Darul Takzim. | 2° 15' 05.20" N | 103° 20' 36.04" E |
| Tereh Selatan Estate | Ptd 3326, Hsd 6766, Mukim Niyor, Daerah Kluang, Johor Darul Takzim | 2° 11' 38.37" N | 103° 21' 8.37" E |
| Selai Estate | GRN 562233, Lot 8848, Mukim Paloh, Daerah Kluang, Johor Darul Takzim | 2° 06' 14.41" N | 103° 23' 14.81" E |
| Mutiara Estate | PN 74877, Lot 3918, Mukim Kahang, Daerah Kluang, Johor Darul Takzim | 2° 17' 16.61" N | 103° 28' 52.13" E |
| Sg Tawing Estate | PTD 2137, Hsd 6060, Mukim Paloh, Daerah Kluang, Johor Darul Takzim | 2°17' 46.75" N | 103° 21' 11.58" E |
| Wawasan Estate | YPJ Plantations Sdn Bhd, 510, 81900 Kota Tinggi, Johor Darul Takzim | 2° 14' 15.10" N | 103° 22' 45.12" E |
| Felda Paloh Estate | FGV Plantations (M) Sdn Bhd, 111, 86007 Kluang, Johor Darul Takzim | 2° 14' 51.07" N | 103° 22' 07.50" E |
| Rengam Estate | Lot 1912, Grn 84384, Mukim Rengam, Daerah Kluang, Johor Darul Takzim | 1° 53' 21.97" N | 103° 24' 49.02" E |

| 5. Description of Supply Base | | | | | |
|--------------------------------------|--|-----------------|--|------------------------|---------------------|
| New Planting Development | <input checked="" type="checkbox"/> No (no change in total planted area) | | <input type="checkbox"/> Yes (please refer to Principle 7 for details) | | |
| Estate / Smallholders | Total Planted (Mature + Immature) (ha) | HCV (ha) | Infrastructure & Other (ha) | Total Area (ha) | % of Planted |
| Tereh Utara Estate | 2,838.26 | 73.89 | 175.22 | 3,087.37 | 92.13 |
| Tereh Selatan Estate | 2,537.37 | 54.76 | 115.09 | 2,707.22 | 93.73 |
| Selai Estate | 3,278.38 | 48.29 | 208.4 | 3,535.07 | 185.57 |
| Mutiara Estate | 3,493.13 | 32.74 | 169.19 | 3,695.06 | 189.35 |
| Sg Tawing Estate | 2,084.29 | 28.38 | 113.1 | 2,225.77 | 93.59 |
| Ladang wawasan | 361.91 | 0.39 | 0.00 | 362.30 | 99.89 |
| FGV Paloh | 1,187.98 | 0.00 | 143.82 | 1,331.80 | 89.20 |
| Rengam Estate | 2,333.99 | 14.11 | 70.14 | 2,418.24 | 96.67 |
| Total | 18,115.31 | 252.56 | 994.96 | 19,362.83 | 93.53 |

Note: * Estate Merger

- Selai Estate is resurveyed and updated the area statement by AASD on 03/05/2021. The previous planted area is 1621.06 ha and changed to 1622.57 ha.
- Mutiara Estate is resurveyed and updated the area statement by AASD on 23/05/2021. The previous planted area is 2311.92 ha and changed to 2311.15 ha.
- Tereh Utara Estate is resurveyed and updated the area statement by AASD on 24/01/2021. The previous planted area is 2858.56 ha and changed to 2838.26 ha.
- Tereh Selatan Estate is resurveyed and updated the area statement by AASD on 02/03/2021. The previous planted area is 2529.78 ha and changed to 2537.37 ha.
- Sungai Tawing Estate is resurveyed and updated the area statement by AASD on 19/04/2021. The previous planted area is 2083.02 ha and changed to 2084.29 ha.
- Rengam Estate is resurveyed and updated the area statement by AASD on 05/09/2021. The previous planted area is 2341.69 ha and changed to 2333.99 ha.
- FGV Paloh Estate is resurveyed and updated the area statement by R&D on 01/01/2022. The previous planted area is 1117.28 ha and changed to 1187.98 ha.

| 6. Plantings & Cycle | | | | | | | |
|---------------------------------|--------------------|---------------|----------------|----------------|----------------|---------------|-----------------|
| Estate / Smallholders | Age (Years) | | | | | Mature | Immature |
| | 0 - 3 | 4 - 10 | 11 - 20 | 21 - 25 | 26 - 30 | | |
| Tereh Utara Estate | 0.00 | 0.00 | 2074.32 | 763.94 | 0.00 | 2838.26 | 0.00 |
| Tereh Selatan Estate | 576.52 | 0.00 | 1960.85 | 0.00 | 0.00 | 1960.85 | 576.52 |
| Selai Estate | 0.00 | 1444.19 | 1834.19 | 0.00 | 0.00 | 3278.38 | 0.00 |
| Mutiara Estate | 1112.92 | 909.99 | 642.27 | 827.95 | 0.00 | 2380.21 | 1112.92 |
| Sg Tawing Estate | 231.82 | 426.39 | 1211.55 | 214.53 | 0.00 | 1852.47 | 231.82 |
| Wawasan Estate | 0.00 | 60.76 | 80.00 | 0 | 221.15 | 361.91 | 0.00 |
| Felda Paloh Estate | 827.13 | 0.00 | 0.00 | 360.85 | 0.00 | 360.85 | 827.13 |

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

| | | | | | | | |
|-------------------|----------------|----------------|----------------|----------------|---------------|-----------------|----------------|
| Rengam Estate | 837.43 | 504.47 | 992.09 | 0.00 | 0.00 | 1496.56 | 837.43 |
| Total (ha) | 3585.82 | 3345.80 | 8795.27 | 2162.43 | 221.15 | 14529.49 | 3585.82 |

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

| Estate / Smallholders | Tonnage / year | | | |
|--------------------------|--|--|---|-------------------------------|
| | Estimated last year (Jan 21 – Dec 21) | Actual (Nov 20 – Feb 22) | | Forecast (Jan 22 – Dec 22) |
| | | Previous license period (Nov 20 – Dec 20) | Current license period (Jan 21 – Feb 22) | |
| Tereh Utara Estate | 64,869 | 10,881.77 | 59,475.55 | 60,908 |
| Tereh Selatan Estate | 50,197 | 7,150.92 | 44,319.51 | 49,129 |
| Selai Estate | 81,210 | 12,377.31 | 84,699.03 | 85,205 |
| Mutiara Estate | 54,735 | 7,958.17 | 48,621.90 | 53,211 |
| Sg Tawing Estate | 40,753 | 5,700.60 | 33,941.12 | 37,871 |
| Wawasan Estate | 9,299 | 832.04 | 6,053.63 | 7,909 |
| Felda Paloh Estate | 24,272 | 1,761.12 | 10,058.22 | 20,644 |
| Rengam Estate | 38,353 | 4,967.93 | 39,987.82 | 45,123 |
| Total (mt) | 363,688* | 378,786.64 | | 360,000 |

Note:

The actual certified volume as per table 7:

| Started date | FFB Volume | CSPO | CSPK |
|--------------|------------|-----------|-----------|
| 21/1/2021 | 363,688.00 | 79,283.98 | 19,275.46 |

The extension of volume has been request and approved as follows:

| Approved date | FFB Volume | CSPO | CSPK |
|---------------|------------|-----------|----------|
| 20/4/2022 | 54,545.45 | 11,181.82 | 3,000.00 |
| 14/7/2022 | 17,778.00 | 3,644.50 | 800.00 |

The total of FFB volume in table 7 were exclude extension of volume approved on 20/04/2022 and 14/07/2022 as per table above.

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

| Estate / Smallholders | Tonnage / year | | | |
|--------------------------|--|--|---|-------------------------------|
| | Estimated last year (Jan 21 – Dec 21) | Actual (Nov 20 – Feb 22) | | Forecast (Jan 22 – Dec 22) |
| | | Previous license period (Nov 20 – Dec 20) | Current license period (Jan 21 – Feb 22) | |

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

| | | | | |
|---------------------|--|------|-----------------|--|
| Kuala Kabong Estate | | 0.00 | 150.49 | |
| Sedenak Estate | | 0.00 | 314.60 | |
| Sindora Estate | | 0.00 | 2638.02 | |
| Total (mt) | | | 3,103.11 | |

| 9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) | | | | |
|--|--|--|---|-------------------------------|
| Out growers / smallholders | Tonnage / year | | | |
| | Estimated last year (Jan 21 – Dec 21) | Actual (Nov 20 – Feb 22) | | Forecast (Jan 22 – Dec 22) |
| | | Previous license period (Nov 20 – Dec 20) | Current license period (Jan 21 – Feb 22) | |
| N/A | N/A | N/A | N/A | N/A |
| Total | N/A | N/A | | N/A |

| 9A. Monthly Records of Certified and Uncertified FFB Received since the last audit | | | | |
|---|-------------------|---|---|-------------------------|
| No. | Month - Year | Volume of FFB from certified supply base (mt) | Volume of FFB from uncertified supply base (mt) | Total FFB/Month (mt) |
| 1 | Nov 2020 | 28,837.57 | 0.00 | 28,837.57 |
| 2 | Dec 2020 | 22,792.29 | 0.00 | 22,792.29 |
| 3 | Jan 2021 | 17,242.19 | 0.00 | 17,242.19 |
| 4 | Feb 2021 | 16,441.69 | 0.00 | 16,441.69 |
| 5 | Mac 2021 | 20,638.69 | 0.00 | 20,638.69 |
| 6 | Apr 2021 | 23,529.76 | 0.00 | 23,529.76 |
| 7 | May 2021 | 23,878.80 | 0.00 | 23,878.80 |
| 8 | Jun 2021 | 9,416.420 | 0.00 | 9,416.420 |
| 9 | Jul 2021 | 25,783.30 | 0.00 | 25,783.30 |
| 10 | Aug 2021 | 32,653.130 | 0.00 | 32,653.130 |
| 11 | Sept 2021 | 26,780.640 | 0.00 | 26,780.640 |
| 12 | Oct 21 | 28,915.73 | 0.00 | 28,915.73 |
| 13 | Nov 21 | 30,893.70 | 0.00 | 30,893.70 |
| 14 | Dec 21 | 28,331.02 | 0.00 | 28,331.02 |
| 15 | Jan 22 | 24,279.62 | 0.00 | 24,279.62 |
| 16 | Feb 2022 | 21,475.20 | 0.00 | 21,475.20 |
| | TOTAL (mt) | 381,889.75 | 0.00 | 381,889.75 |

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

| 10. Summary of Certified Tonnage (not applicable for ISS) | | | |
|---|--|---|---------------------------------------|
| Estimated last year (Jan 21 – Dec 21) | Actual (Nov 20 – Feb 22) | | Forecast (Jan 22 – Dec 22) |
| | Previous license period (Nov 20 – Dec 20) | Current license period (Jan 21 – Feb 22) | |
| FFB | FFB | | FFB |
| 436,011.45* mt | 51,629.86 mt | 330,259.89 mt | 360,000.00 mt |
| | 381,889.75 mt | | |
| CPO (OER: 21.80 %) | CPO (OER: 20.92 %) | | CPO (OER: 21.50 %) |
| 94,110.30 mt | 10,925.21 mt | 68,966.13 mt | 77,400.00 mt |
| | 79,891.34 mt | | |
| PK (KER: 5.30 %) | PK (KER: 5.53%) | | PK (KER: 5.43 %) |
| 23,075.46 mt | 2,779.99 mt | 18,338.51 mt | 19,548.00 mt |
| | 21,118.50 mt | | |
| Note: *The extension of volume has been request and approved as follows: | | | |
| Approved date | FFB Volume | CSPO | CSPK |
| 20/4/2022 | 54,545.45 | 11,181.82 | 3,000.00 |
| 14/7/2022 | 17,778.00 | 3,644.50 | 800.00 |

| 10A. Monthly Records of Certified CPO & PK since the last audit | | | |
|--|---------------------|---------------------------|--------------------------|
| No. | Month - Year | Certified CPO (mt) | Certified PK (mt) |
| 1 | Nov 2020 | 6,095.78 | 1,573.02 |
| 2 | Dec 2020 | 4,829.43 | 1,206.97 |
| 3 | Jan 2021 | 3,349.41 | 955.49 |
| 4 | Feb 2021 | 3,578.14 | 897.63 |
| 5 | Mac 2021 | 4,354.67 | 1,141.11 |
| 6 | Apr 2021 | 4,817.54 | 1,295.53 |
| 7 | May 2021 | 5,042.85 | 1,181.47 |
| 8 | Jun 2021 | 1,994.80 | 478.53 |
| 9 | Jul 2021 | 5,356.27 | 1,355.91 |
| 10 | Aug 2021 | 6,713.39 | 1,913.02 |
| 11 | Sept 2021 | 5,515.06 | 1,536.27 |
| 12 | Oct 21 | 6,091.28 | 1,596.21 |
| 13 | Nov 21 | 6,567.42 | 1,672.28 |
| 14 | Dec 21 | 6,011.58 | 1,497.23 |

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

| | | | |
|--------------|--------|------------------|------------------|
| 15 | Jan 22 | 4,874.00 | 1,392.00 |
| 16 | Feb 22 | 4,699.72 | 1,425.83 |
| TOTAL | | 79,891.34 | 21,118.50 |
| Note: | | | |

| 11. Summary of Actual Volume sold | | | | | |
|--|----------------|-------------------------|--------|--------------|-----------|
| Current License period (Jan 21 – Feb 22) | | | | | |
| | RSPO Certified | Other Schemes Certified | | Conventional | Total |
| | | ISCC | Others | | |
| CPO (MT) | 61,881.05 | 0.00 | 0.00 | 1,964.00 | 63,845.05 |
| PK (MT) | 16,784.04 | 0.00 | 0.00 | 0.00 | 16,784.04 |
| Credits | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Previous License period (Nov 20 – Dec 20) | | | | | |
| CPO (MT) | 14,944.21 | 0.00 | 0.00 | 0.00 | 14,944.21 |
| PK (MT) | 3,359.67 | 0.00 | 0.00 | 536.87 | 3,896.54 |
| Credits | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Note: | | | | | |

| 11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any) | | | | |
|--|-------------|----------------------------------|-------------------------|------------------------|
| No. | Buyers Name | Palmtrace Trading License Number | Certified CPO Sold (mt) | Certified PK Sold (mt) |
| 1. | AAA | TR-xxxxxxxx-xxxx | 76,825.26 | 0.00 |
| 2. | BBB | TR-xxxxxxxx-xxxx | 0.00 | 20,143.71 |
| TOTAL | | | 76,825.26 | 20,143.71 |
| Note: | | | | |

| 11B. Records of CPO & PK Sold under other schemes since the last audit (if any) | | | | |
|--|-------------|-------------|---------------|--------------|
| No. | Buyers Name | Scheme Name | CPO Sold (mt) | PK Sold (mt) |
| | N/A | N/A | N/A | N/A |
| TOTAL | | | N/A | N/A |
| Note: | | | | |

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

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

| No. | Buyers Name | CPO Sold (mt) | PK Sold (mt) |
|--------------|-------------|-----------------|---------------|
| 1. | AAA | 668.41 | 536.87 |
| 2. | BBBB | 47.21 | 0.00 |
| 3. | CCC | 78.72 | 0.00 |
| 4. | DDD | 382.06 | 0.00 |
| 5. | EEE | 663.82 | 0.00 |
| 6. | FFF | 123.78 | 0.00 |
| TOTAL | | 1,964.00 | 536.87 |
| Note: | | | |

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

| 12. Independent Smallholders Certified Tonnage / Volume | | | | | | | | | |
|---|---|------|------|----------------------------|------|------|------------------------------|------|------|
| Phase | Estimated last year (Not applicable) | | | Actual (Not applicable) | | | Forecast (Not applicable) | | |
| | 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 | | | N/A | | | N/A | | | N/A |
| IS-CSPO | N/A | N/A | | N/A | N/A | | N/A | N/A | |
| IS-CSPKO | N/A | N/A | | N/A | N/A | | N/A | N/A | |
| IS-CSPKE | N/A | N/A | | N/A | N/A | | N/A | N/A | |

| 13. Independent Smallholders Actual Sold Tonnage / Volume | | | | | | |
|---|-----|------------------|-------------------|---------|---------|----------|
| | FFB | FFB Conventional | FFB Other schemes | IS-CSPO | IS-CSPK | IS-CSPKE |
| Current License period (Not applicable) | | | | | | |
| Credits | | | | N/A | N/A | N/A |
| Physical | N/A | N/A | N/A | | | |

Section 2: Assessment Process

Certification Body:

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

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 07 – 09/03/2022. 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 24th March 2020. The remote audit was conducted on 04 – 05/10/2021.

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 Critical NC close out on-site assessment was conducted on 31/05/2022. The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Malaysia National Interpretation 2019 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

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

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

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 (Re-Certification) | Year 2 (ASA 2_1) | Year 3 (ASA 2_2) | Year 4 (ASA 2_3) | Year 5 (ASA 2_4) |
| Tereh Palm Oil Mill | / | / | / | / | / |
| Tereh Utara Estate | | / | | | / |
| Tereh Selatan Estate | | / | | | |
| Selai Estate & Enggang Estate Div | / | | | / | / |
| Mutiara Estate & Sg Sembrong Estate Div | | / | / | | / |
| Sg Tawing Estate | / | | | / | |
| Wawasan Estate | | | / | | |
| Felda Paloh Estate | | | | / | |
| Rengam Estate | | | / | | |

Tentative Date of Next Visit: March 6, 2023 - March 9, 2023

Total Number of Mandays: 12 Mandays

2.2 BSI Assessment Team

| Name | Role | Competency |
|------------------------------|-------------|---|
| Muhammad Fadzli Masran (MFM) | Team Leader | <p>Education: Holds a Bachelor Degree in Forestry Science, University Putra Malaysia</p> <p>Work Experience: He has more than 10 years working experience in palm oil estate as Assistant Manager managing operations and sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. He involved in internal auditing on ISO9001 and ISO14001 standards.</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course, Endorsed RSPO Lead Auditor Course, MSPO Lead Auditor Course, Endorsed RSPO Supply Chain Certification training course, MSPO Supply Chain Certification System (SCCS) Auditor training</p> |

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

| | | |
|---|--------------------|---|
| | | <p>Course, CQI and IRCA Certified ISO 9001:2015 Lead Auditor Training Course, HCV and GIS Training and SMETA Requirements Training.</p> <p>Aspect covered in this audit: Economic management plan, mill best practices, estate best practices, natural and biodiversity conservation, Waste management, GHG, HCV.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English.</p> |
| <p>Mohamed Zainal (MHZA)</p> <p>Hidhir Abidin</p> | <p>Team Member</p> | <p>Education: Holds a Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006.</p> <p>Work Experience: 4½ years working experience in palm oil industry specifically in palm oil mill as Mill Engineer. More than 10 years of auditing experience with accredited certification body for several schemes include ISO9001, ISO14001, OHSAS18001 (now ISO45001), RSPO, MSPO and RBA Labor Ethics</p> <p>Training attended: He has completed ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, MSPO Awareness Training, Endorsed RSPO SCCS Lead Auditor Course, HCV & HCS Introductory Training and SMETA Requirements Training.</p> <p>Aspect covered in this audit: Policy and commitment, Social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land & Legal issue and RSPO supply chain requirements.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English.</p> |
| <p>Mahzan (MM)</p> <p>Munap</p> | <p>Team Member</p> | <p>Education: Holds a Bachelor of Science in Petroleum Engineering from University of Missouri, USA and Master of Business Administration from Ohio University</p> <p>Work Experience: 38 years of working experience spanning the oil & gas, chemicals and petrochemicals, power generation, cement plants, electronics, services, construction and general manufacturing industries, oil palm plantations and government sectors. Has extensive experience in developing and implementing Safety and Environmental Management System, preparing Emergency Response Procedures, conducting Safety and Environmental Audits, Quantified Risk Assessment, Loss Control and Prevention and HAZOP studies for the major petrochemical and chemical industries. Has been qualified to perform ISO9001, ISO14001, OHSAS18001 (now ISO45001), since year 2000 and later qualified to perform RSPO P&C and MSPO P&C audits.</p> <p>Training attended: He has completed Endorsed RSPO P&C Lead Assessor Course, ISO 9001 IRCA accredited Lead Auditor Course, ISO 14001 EMS RABQSA/IRCA Lead Assessor Course; HCV & HCS Introductory Training and SMETA Requirements Training.</p> <p>Aspect covered in this audit: Legal and other requirement mill best practices, estate best practices, Occupation Health Safety requirement, Risk Assessment, and training.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English.</p> |

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

Accompanying Persons:

| Name | Role |
|------|------|
| N/A | N/A |

1.3 Assessment Plan

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

(30% Remote Audit)

| Date | Time | Subjects | MFM | MHZA | ICT Planned |
|---------------------------------------|------------------|---|-----|------|---|
| Monday, 27/09/2021 | 10.30 – 12.00 | <ul style="list-style-type: none"> 1. Communication on remote audit document preparation 2. Online teleconference trial | √ | | Microsoft Teams/Google Meet/Zoom |
| Monday, 04/10/2021 | 09.00 – 09.30 | Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan | √ | √ | Microsoft Teams, Email, WhatsApp Video call, Teleconference |
| 09.00 – 13.00 Sg. Tawing Estate | 09.30 – 10.30 | Assessment and documentation review on: <ul style="list-style-type: none"> • Good agriculture practice, legal requirements, environment and HCV | √ | √ | Microsoft Teams, Email, WhatsApp Video call, Teleconference |
| | 10.30 – 11.30 | Assessment and documentation review on: <ul style="list-style-type: none"> • Legal requirements, OHS and continual improvement | √ | √ | Microsoft Teams, Email, WhatsApp Video call, Teleconference |
| | 11.30 – 12.30 | Assessment and documentation review on: <ul style="list-style-type: none"> • Social aspects, legal requirements, employees' welfare and stakeholder management | √ | √ | Microsoft Teams, Email, WhatsApp Video call, Teleconference |
| | 12.30 – 14.00 | Interim Closing Meeting | √ | √ | Microsoft Teams, Email, WhatsApp Video call, Teleconference |
| | 13.00 – 14.00 | Lunch break | √ | √ | Microsoft Teams, Email, WhatsApp Video call, Teleconference |
| 14.00 – 17.30 | 14.00 – 15.00 | Assessment and documentation review on: <ul style="list-style-type: none"> • Good agriculture practice, legal requirements, environment and HCV | √ | √ | Microsoft Teams, Email, WhatsApp Video call, Teleconference |

| Date | Time | Subjects | MFM | MHZA | ICT Planned |
|---|---------------|---|-----|------|--|
| Felda Paloh Estate | 15.00 – 16.00 | Assessment and documentation review on: • Legal requirements, OHS and continual improvement | √ | √ | Microsoft Teams, Email, WhatsApp Video call, Teleconference |
| | 16.00 – 16.45 | Assessment and documentation review on: • Social aspects, legal requirements, employees' welfare and stakeholder management | √ | √ | Microsoft Teams, Email, WhatsApp Video call, Teleconference |
| | 16.45 – 17.30 | Interim Closing Meeting | √ | √ | Microsoft Teams/Google Meet/Zoom, Email, WhatsApp Video call, Teleconference |
| Tuesday, 05/10/2021 09.00 – 13.00 Tereh Palm Oil Mill | 9.00 – 10.30 | Assessment and documentation review on: • Mill best practice, legal requirements, environment and supply chain requirements | √ | √ | Microsoft Teams, Email, WhatsApp Video call, Teleconference |
| | 10.30 – 11.30 | Assessment and documentation review on: • Mill best practice, legal requirements, OHS, continual improvement and supply chain requirements | √ | √ | Microsoft Teams, Email, WhatsApp Video call, Teleconference |
| | 11.30 – 13.00 | Assessment and documentation review on: • Social aspects, legal requirements, employees' welfare, stakeholder management and supply chain requirements | √ | √ | Microsoft Teams, Email, WhatsApp Video call, Teleconference |
| | 9.00 – 10.30 | Lunch break | √ | √ | Microsoft Teams, Email, WhatsApp Video call, Teleconference |
| 14.00 – 17.00 Enggang Estate | 14.00 – 15.00 | Assessment and documentation review on: • Good agriculture practice, legal requirements, environment and HCV | √ | √ | Microsoft Teams, Email, WhatsApp Video call, Teleconference |
| | 15.00 – 16.00 | Assessment and documentation review on: • Legal requirements, OHS and continual improvement | √ | √ | Microsoft Teams, Email, WhatsApp Video call, Teleconference |
| | 16.00 – 16.45 | Assessment and documentation review on: • Social aspects, legal requirements, employees' welfare and stakeholder management | √ | √ | Microsoft Teams, Email, WhatsApp Video call, Teleconference |

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

| Date | Time | Subjects | MFM | MHZA | ICT Planned |
|------|---------------|----------------------------|-----|------|---|
| | 16.45 – 17.00 | Assessment team discussion | √ | √ | Microsoft Teams, Email, WhatsApp Video call, Teleconference |
| | 17.00 – 17.30 | Closing Meeting | √ | √ | Microsoft Teams, Email, WhatsApp Video call, Teleconference |

(70% Onsite Assessment)

| Date | Time | Subjects | MFM | MM | MHZA |
|-----------------------|---------------|---|-----|----|------|
| Sunday 06/03/2022 | PM | Audit Team Travelling | √ | √ | √ |
| Monday 07/03/2022 | 08.30 – 09.00 | Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan | √ | √ | √ |
| Tereh Palm Oil Mill | 09.00 – 12.30 | Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc. | √ | √ | √ |
| | 09.00 – 13.30 | Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) | | | √ |
| | 12.30 – 13.30 | Lunch | √ | √ | √ |
| | 13.30 – 16.30 | Lab, weighbridge and palm product storage area. Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation. RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records. | √ | √ | √ |
| | 16.30 – 17.00 | Interim Closing briefing. | √ | √ | √ |
| Tuesday 08/03/2022 | 09.00 – 10.30 | Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area | √ | √ | √ |

| Date | Time | Subjects | MFM | MM | MHZA |
|---|---------------|--|-----|----|------|
| Sg. Tawing Estate | 10.30 – 13.00 | (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) 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.) | | | √ |
| | 13.00 – 14.00 | Lunch and travel to Sg. Tawing Estate | √ | √ | √ |
| Tuesday 08/03/2022 Felda Paloh Estate | 14.00 – 15.30 | Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) 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.) | √ | √ | √ |
| | 15.30 – 17.00 | | | | √ |
| | 17.00 - 17.30 | Interim Closing briefing. | √ | √ | √ |
| Wednesday 09/03/2022 Selai Estate. | 09.00 – 13.00 | 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. | √ | √ | √ |
| | 9.30 – 13.00 | Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) | | | √ |
| | 13.00 – 14.00 | Lunch | √ | √ | √ |

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

| Date | Time | Subjects | MFM | MM | MHZA |
|------------------------|---------------|---|-----|----|------|
| | 14.00 – 16.30 | 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.) | √ | √ | √ |
| | 16.30 – 17.00 | Preparation of audit report | √ | √ | √ |
| | 17.00 – 17.30 | Closing Meeting | √ | √ | √ |
| Thursday 10/03/2022 | PM | Audit Team Travelling to Kuala Lumpur | √ | √ | √ |

Major NC Close Out

| Date | Time | Subjects | MFM |
|-----------------------|---------------|---|-----|
| Monday 30/05/2022 | PM | Auditor Travelling | √ |
| Tuesday 31/05/2022 | 09.00 – 09.15 | Opening Meeting: Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan | √ |
| | 09.00 – 12.00 | Verification on previous Major NC: 1. 2175579-202203-M1 2. 2175579-202203-M2 a) Site observation ,workers interview (individual and group session) if necessary b) Document review – implemented evidence | √ |
| | 12.00 – 13.00 | Closing Meeting | √ |
| | 13.00 | Audit Team travel back | √ |

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? | 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? | All the estates and mills 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 RSPO ACOP reporting. The link provided below: https://rspo.org/members/310/Johor-%20Corporation | Complied |
| Have there been any isolated lapses in implementation of the plan? If yes a Minor 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 Major non-compliance shall be raised | There has been no fundamental failure to proceed with the implementation of the plan. | Complied |
| Un-Certified Units or Holdings | | |
| No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12. | There is no new plantings that replace primary forest. | Complied |
| Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure. | There are no new plantings since January 1st 2010. | Complied |
| Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance | No land conflict under all certification units as verified through RSPO RaCP tracker. | Complied |

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

| | | |
|---|---|----------|
| with RSPO P&C criteria 4.4, 4.5, 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? | Not applicable | Complied |
| Have there been any stakeholder (including NGO) consultation conducted? | Not applicable | Complied |

3.2 Progress of scheme smallholders and/or outgrowers

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

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

Approved Time Bound Plan

Time Bound Plan for 100% Own Certified FFB

| 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 th October 2021. RSPO certification TimeBound 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 Palm Oil Mill | | 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"> 1. Selai & Enggang under the name of Selai Estate 2. Mutiara & Sg Sembrong under the name of Mutiara Estate 3. REM & Ulu Tiram under the name of REM Estate 4. Mungka & Sepang Loi under the name of Mungka Estate 5. Palong & Kemedak under the name of Palong Estate |
| | | Tereh utara | | |
| | | Sg. Tawing | | |
| | | Rengam | | |
| | | *Selai | | |
| | | *Enggang | | |
| | | *Mutiara | | |
| | | *Sg. Sembrong | | |

| | | | | |
|--------------------|----------------|--------------|------------------------------|---|
| Sindora Mill | Kulim EState | Sindora | Certified RSPO in March 2017 | <p>6. Pasir Panjang & Bukit Payung under the name of Pasir Panjang Estate</p> <p>**The SINDORA POM supply bases been chnged, to add in the following supply bases :</p> <ol style="list-style-type: none"> 1. Basir Ismail Estate 2. Ulu Tiram Estate |
| | | Sungai Papan | | |
| **Basir Ismail | | | | |
| *Rem | | | | |
| * **Ulu Tiram | | | | |
| Sedenak Mill | | Sedenak | | |
| Palong Mill | | Kuala Kabong | | |
| | | Umac | | |
| | | Labis Bahru | | |
| | | *Mungka | | |
| | | *Sepang Loi | | |
| | | *Palong | | |
| | | *Kemedak | | |
| Pasir Panjang Mill | *Pasir Panjang | | | |
| | *Bukit Payung | | | |
| | 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 two (2) Critical; one (1) Minor nonconformities and two (2) Opportunity For Improvement raised. The Kulim Tereh Palm Oil Mill and Supply Base Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

| Non-conformity | | | |
|---|---|--------------------------------------|------------|
| NCR Ref # | 2175579-202203-M1 | Date Issued | 10/03/2022 |
| Due Date | 08/06/2022 | Date of nonconformity Closure | 31/05/2022 |
| Clause & Category (Critical / Minor) | 3.4.3 – Critical | | |
| Statement of Nonconformity: | Social management and monitoring plan was not comprehensively reviewed updated regularly in a participatory way | | |
| Requirement Reference: | The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. | | |
| Objective Evidence: | FGVPM Ladang Paloh SIA management plan (2/21, dated 20/9/21) has not comprehensively identified pertinent issues related to: <ul style="list-style-type: none"> i) Expensive pricing of goods at sundry shop ii) Communication problem, repatriation of the spokesperson/worker's representative iii) Insufficient medical benefit limit (outpatient) iv) "Kadar Upah Kerja" rate/quantity for piece rated task (bil. 7 for 2022) v) Understanding of salary calculation in the pay slip. The above issues were highlighted during interview with workers representative (Bangladesh, Indonesia and India) and a group of Indian and Bangladeshi workers. Thus, the regular review and update process of SIA management plan was effectively demonstrated in a participatory way. | | |
| Corrections: | i.a. Estate management had discussed with the sundry shop owner on 18.3.2022 with regards to expensive goods price. i.b. Estate had reviewed goods pricing and comparison had been done with other retails shop in estate. i.c. Review SIA management plan and include the issue of expensive goods pricing. ii.a. Estate management to appoint spokesperson/worker's representative to replace repatriation workers by election process. ii.b. Review SIA management plan and include the issue of Communication problem, repatriation of the spokesperson/workers representative. | | |

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

| | |
|-------------------------------|---|
| | <p>iii.a. Estate Management immediately review the medical benefit limit to workers (outpatient).</p> <p>iii.b. Estate management will conduct the briefing on medical benefit that entitlement to all workers on 14 & 15 Mac 2022</p> <p>iii.c. Review SIA management plan and include the issue of Insufficient medical benefit limit (outpatient).</p> <p>iv.a. Briefing immediately conducted for) "Kadar Upah Kerja" rate/quantity for piece rated task (bil. 7 for 2022) on 16.3.2022.</p> <p>iv.b. Review SIA management plan and to include the issue of "Kadar Upah Kerja" rate/quantity for piece rated task (bil. 7 for 2022).</p> <p>v.a. Briefing immediately conducted for salary calculation in the pay slip on 16 Mac 2022.</p> <p>v.b. Review SIA management</p> <p>v.c. plan and include the issue salary calculation in the pay slip.</p> |
| Root Cause Analysis: | <p>i. Inadequate monitoring over price of good by estate management at sundry shop.</p> <p>ii. Estate management had overlooked to appoint spokesperson/worker's representative to replace repatriation workers.</p> <p>iii. Estate was not aware on requirement to review medical benefit limit to workers (outpatient).</p> <p>iv. Inadequate briefing provided on) "Kadar Upah Kerja" rate/quantity for piece rated task (bil. 7 for 2022) to the workers.</p> <p>v. Lack of understanding of salary calculation in the pay slip</p> |
| Corrective Actions: | <p>i.a. Discussion will be made with respective sundry shop to determine acceptable price for each goods. Estates will establish goods price listing based as per agreed by shop owner throughout discussion. The price listing will be display at necessary section in estate for workers references.</p> <p>i.b. Estate will regularly review goods pricing comparably to other estate retail shop to ensure reasonable and acceptable goods price by sundry shop.</p> <p>ii.a. New Appointment of spokesperson/worker's representative by election from workers. Estate will appoint two representatives to ensure no recurrence issue incurred.</p> <p>iii.a. Estate management will conduct the briefing and periodically review medical benefit limit that entitlement to all workers.</p> <p>iii.b. The briefing will be included in training plan as annually program.</p> <p>iv.a. Periodically refresher briefing will be conducted to all workers and included in training plan as annually program.</p> <p>v.a. Periodically refresher briefing will have conducted to all workers.</p> <p>v.b. The briefing will be included in training plan as annually program.</p> |
| Assessment Conclusion: | <p>Verification during on-site assessment:</p> |

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

FGV Paloh Estate has issue reminder letter to the sundry shop (TZ One Enterprise) owner to display the goods price s per letter with ref. no (01)3452/SURATPERINGATAN dated 18/03/2022. Other estates has also issued the same letter to all the sundry shops operated in the estates. FGV Paloh Estate has conducted meeting with the sundry shop (TZ One Enterprise) owner on 16/04/2022 and brief on the applicable policy and procedure. Sundry shop (TZ One Enterprise) owner has submitted price list of item sold in the shops.

FGV Paloh Estates has established Sundry Shops Monitoring Plan. The monitoring was planned to be conducted on quarterly basis. Latest monitoring was conducted monitoring on 30/04/2022 by Estate RSPO Assistant and recorded in "Kertas Semanak Harga Barangan Kedai Runcit" form. The price was displayed at the Sundry Shops. Noted during interview with workers representative, the price was affordable and acceptable.

FGV Paloh Estate has conducted election day on 17/03/2022 for all workers to elect workers representative by race. Reviewed the election day report "Minit, Penamaan Calon, Proses Pilihan Raya & Lantikan Wakil Pekerja Bil 01/2022, 14hb-17hb Mac 2022".

The estate has issued appointment letter to the workers representative elected by the election. Review appointment letter no. (07)0452/FGVPM-L2-PP-Lantikan, (08)0452/FGVPM-L2-PP-Lantikan and (09)0452/FGVPM-L2-PP-Lantikan dated 18/03/2022.

Noted during interview with the workers representative confirmed on the election results and they understand on the workers representative responsibility.

FGV Paloh Estate has conducted briefing on the medical benefits entitlement on 14-15/03/2022.

FGV Paloh Estate has invited Operation Manager South Zone, FGVPMSB Labor Department to conduct briefing on the medical benefits entitlement on 30/03/2022. Reviewed the training reports, attendants' records and training materials.

Noted during interview with workers representative, the understanding on the medical benefits entitlement is satisfactory.

FGV Paloh Estate has conducted briefing on "Kadar Upah Kerja" rate/quantity for piece rated task (bil. 7 for 2022) and salary calculation to the workers on 16/03/2022.

FGV Paloh Estate has invited FGVPMSB Estate Worker Employment Unit, Human Resources Department to conduct briefing "Kadar Upah Kerja" rate/quantity for piece rated task (bil. 7 for 2022) and salary calculation to the workers on 30/03/2022. Reviewed the training reports, attendants' records and training materials.

Noted during interview with workers representative, the understanding on the "Kadar Upah Kerja" rate/quantity for piece rated task (bil. 7 for 2022) and salary calculation was satisfactory.

The estate has established training plan FY 2022 and included all the plans for training and refresher briefing in the training plan.

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

| | |
|--|--|
| | <p>The estate has review the Social Impact Assessment report by Senior Executive from Plantation Sustainability Department on 13/03/2022. Refer report no. 01/2022 dated 16/03/2022. Base on the results of the assessment, the estate has established management plan documented in "Jadual 4.2 Pelan Analisis Pengurusan (Management Plan) dan Pelan Penambahbaikan Berterusan (Improvement Plan) bagi Impak Negetif Social di Ladang FGV Paloh". The management plan include issue on:</p> <ol style="list-style-type: none"> 1. Price was not displayed at the sundry shops 2. No formal appointment for replacement of spokesperson who are repatriated. 3. Insufficient medical benefits limit 4. Inadequate briefing provided on) "Kadar Upah Kerja" rate/quantity for piece rated task (bil. 7 for 2022) to the workers. 5. Lack of understanding of salary calculation in the pay slip <p>All the corrective action and evidence of implementation were found to be adequate and effectively implemented. The Major NC closed on 31/05/2022.</p> |
|--|--|

| Non-conformity | | | |
|---|---|--------------------------------------|------------|
| NCR Ref # | 2175579-202203-M2 | Date Issued | 10/03/2022 |
| Due Date | 08/06/2022 | Date of nonconformity Closure | 31/05/2022 |
| Clause & Category (Critical / Minor) | 6.7.3 - Critical | | |
| Statement of Nonconformity: | Appropriate PPE was found not worn at the place of work to cover all potentially hazardous operation. | | |
| Requirement Reference: | 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. | | |
| Objective Evidence: | Tereh POM: During site visit at Boiler area, found the Fireman not wearing the appropriate PPE provided. | | |
| Corrections: | Training has been conducted to all personnel at boiler house namely Boiler man, and Fireman on 10.3.2022. | | |
| Root Cause Analysis: | Insufficient awareness and training to use appropriate personal protective equipment (PPE) for workers. | | |
| Corrective Actions: | Refresher training will be conduct regularly to all personnel at respective station in mill as per training plan. | | |
| Assessment Conclusion: | <p>Verification during on-site assessment:</p> <p>The mill has conducted training on PPE and safety at Boiler Station on 10/03/2022. The training was conducted by the Asst. Manager and attended by Boilermans and Firemans. Reviewed the training reports, attendants' records, training materials and training evaluation.</p> | | |

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

| | |
|--|---|
| | <p>The mill has established Internal Annual Training Program FY 2022 and included all the plans for training and refresher briefing in the training plan.</p> <p>All the corrective action and evidence of implementation were found to be adequate and effectively implemented. The Major NC closed on 31/05/2022.</p> |
|--|---|

| Non-conformity | | | |
|---|---|--------------------------------------|------------------------|
| NCR Ref # | 2175579-202203-N1 | Date Issued | 10/03/2022 |
| Due Date | During Next Assessment | Date of nonconformity Closure | During Next Assessment |
| Clause & Category (Critical / Minor) | 6.3.3 - Minor | | |
| Statement of Nonconformity: | Formation of freely elected representatives for migrant workers were not effectively demonstrated. | | |
| Requirement Reference: | 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. | | |
| Objective Evidence: | FGVPM Ladang Paloh New workers representatives were appointed for each nationalities (Bangladesh, Indonesia and India). Based on interview with the workers representatives, they were appointed by management and this was also confirmed by the estate's assistant. No evidence of free elected process for the new foreign workers representative as to date. | | |
| Corrections: | a. Briefing on freely elected representatives for migrant workers by election process immediately conducted on 13.3.2022. b. Estate management will have conducted the election program on 17.3.2022 by circulation of MEMO. c. The minutes of election will be recorded and kept. | | |
| Root Cause Analysis: | Inadequate awareness on freely elected representatives for migrant workers. | | |
| Corrective Actions: | a. The briefing on freely elected representatives for migrant workers by election process conducted regularly / upon induction briefing. b. The election process will immediately conduct if existing representative completed employment and going back for good. The appointment term was for 3 years, hence, election will be done in every 3 years interval. | | |
| Assessment Conclusion: | The effectiveness of CAP implementation will be assessed during next assessment | | |

| Opportunity for Improvements | |
|------------------------------|-----------------------------------|
| OFI # | Description |
| 2175579-202203-11 | Clause 3.6.1 Sg. Tawing Estate |

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

| | |
|--------------------------|---|
| | Although the Sg. Tawing Estate Risk Register was reviewed on 25.08.2021 its severity and likelihood ranking for activity to inflate tractor tyre could be revised in light of tyre bursting accident in the tyre servicing and replacement industry (workshop). |
| 2175579-202203-I2 | <p>Clause 2.1.2 FGVPM Ladang Paloh</p> <p>To expedite and follow up the application process for competent person for genset operation.</p> |

| Positive Findings | |
|-------------------|--|
| PF # | Description |
| PF 1 | Good cooperation given to the audit team by site and HQ team |

3.3.1 Status of Nonconformities Previously Identified and Observations

| Non-conformity | | | |
|--------------------------------------|-----|-------------------------------|-----|
| NCR Ref # | N/A | Date Issued | N/A |
| Due Date | N/A | Date of nonconformity Closure | N/A |
| Clause & Category (Critical / Minor) | N/A | | |
| Statement of Nonconformity: | N/A | | |
| Requirement Reference: | N/A | | |
| Objective Evidence: | N/A | | |
| Corrections: | N/A | | |
| Root Cause Analysis: | N/A | | |
| Corrective Actions: | N/A | | |
| Assessment Conclusion: | N/A | | |

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

3.3.2 Summary of the Nonconformities and Status

| CAR Ref. | Category (Critical / Minor) | P&C Indicator | Issued Date | Status & Date (Closure) |
|-------------------|-----------------------------|---------------|-------------|--------------------------|
| 1683546-201809-M1 | Major | 6.5.1 | 28/09/2018 | Closed out on 24/12/2018 |
| 1683546-201809-N1 | Minor | 2.1.3 | 28/09/2018 | Closed out on 14/10/2019 |
| 1683546-201809-N2 | Minor | 4.3.2 | 28/09/2018 | Closed out on 14/10/2019 |
| 1838700-201906-N1 | Minor | 6.5.3 | 17/10/2019 | Closed out on 12/11/2020 |
| 1838700-201906-N2 | Minor | 4.1.3 | 17/10/2019 | Closed out on 12/11/2020 |
| 1838700-201906-N3 | Minor | 4.7.3 | 17/10/2019 | Closed out on 12/11/2020 |
| 1984918-202011-N1 | Minor | 3.7.2 | 12/11/2020 | Closed out on 05/10/2021 |
| 2175579-202203-M1 | Major | 3.4.3 | 10/03/2022 | Closed out on 31/05/2022 |
| 2175579-202203-M2 | Major | 6.7.3 | 10/03/2022 | Closed out on 31/05/2022 |
| 2175579-202203-N1 | Minor | 6.3.3 | 10/03/2022 | Open |

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 Kulim Tereh Palm Oil Mill and Supply Base 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) |
| External | Carotino Sdn Bhd | Phone interview |
| Internal | Foreign workers representatives (FGVPM Paloh Estate) | Face to face interview |
| Internal | Gender committee representative @ WOW | Face to face interview |
| State Union Representative | NUPW/MAPA Kluang, Johor | Phone interview |
| Contractor/Vendor/Supplier | Yew Tan Enterprise | Phone interview |

| Stakeholders comment | |
|----------------------|--|
| 1 | <p>Feedbacks: Workers Representatives (by nationality) – Kulim (M) Berhad’s group estates No issue with the management and always open for consultation and assistance. Equal opportunity to all workers regardless of their nationality, gender and race. No issues with regards of employment conditions as confirmed and verified through worker’s interview. Wages and other entitlements were in lined with employment contract and MAPA/NUPW collective agreement.</p> <p><u>FGVPM Paloh Estate</u> The newly appointed representatives for each nationality (Bangladesh, Indonesia and India) were interviewed. Based on interview with them, they were appointed by management and this was also confirmed by the estate's assistant. No evidence of free elected process for the new foreign workers representative as to date. A few issues highlighted as such:</p> <ul style="list-style-type: none"> i) Expensive pricing of goods at sundry shop ii) Communication problem, repatriation of the spokesperson/worker's representative iii) Insufficient medical benefit limit (outpatient) iv) "Kadar Upah Kerja" rate/quantity for piece rated task (bil. 7 for 2022) v) Understanding of salary calculation in the pay slip. <p>Audit Team verification and response: The above issues were not effectively resolved, and non-conformities were raised under 3.4.3 and 6.3.3</p> |
| 2 | <p>Feedbacks: 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.</p> <p>Audit Team verification and response: 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.</p> |
| 3 | <p>Feedbacks: 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>Audit Team verification and response: No negative comments raised by contractors.</p> |
| 4 | <p>Feedbacks: NUPW/MAPA Kluang – No reported industrial relation (IR) issue to NUPW/MAPA state office. MAPA/NUPW in the midst of discussion on the increment of salary (15%) and to renew the collective agreement.</p> <p>Audit Team verification and response: 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 estates have undergone 2nd cycle of replanting. | | | | | |



| Previous land owner / user comment | |
|------------------------------------|--|
| | Feedbacks: N/A |
| | Audit Team verification and response: N/A |

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.

Formal Signing-off of Assessment Conclusion and Recommendation

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

| Report prepared by | Acceptance of Assessment Conclusion |
|---|---|
| Name: Muhammad Fadzli b. Masran | Name: Salasah Elias |
| Company Name: BSI Services (M) Sdn. Bhd. | Company Name: Kulim (Malaysia) Berhad |
| Title: Client Manager | Title: Deputy General Manager |
| Signature:  | Signature: <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>  |
| Date: 08/07/2022 | Date: 19/07/2022 |

Appendix A: Summary of Findings

| Criterion / Indicator | Assessment Findings | Compliance |
|---|---|------------|
| Principle 1: Behave ethically and transparently | | |
| Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making. | | |
| 1.1.1 | <p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p> <p>Tereh Oil Mill and its supply base make available documents specified in the RSPO P&C to the public. These documents are either available via the Company's website http://www.kulim.com.my or available at the office, or can be accessible at each operating unit:</p> <ul style="list-style-type: none"> - Land titles/user rights - Occupational health and safety plans - Plans and impact assessments relating to environmental and social impacts - HCV documentation - Pollution prevention and reduction plans - Details of complaints and grievances - Continuous improvement plans - Public summary of certification assessment report - Human Rights Policy - Summary report of contributions to community development <p>Stakeholders were also informed of the availability of these documents during stakeholder meeting for all units on 29th September 2021.</p> | Complied |

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

| | | | |
|-------|---|--|----------|
| | | For RSPO certified external supplier, publicly available documents can be found the company website at https://kulim.com.my and also available at operating unit's office. | |
| 1.1.2 | Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor 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 29 th September 2021 attended by relevant stakeholders. The briefing was conducted in Bahasa Malaysia by the Environmental Officer, Kulim (Malaysia) Sdn Bhd. | Complied |
| 1.1.3 | (C) 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 29/09/2021 attended by invited stakeholders. | Complied |
| 1.1.4 | (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance - | Kulim (M) Berhad continuous to implement the SOP entitled, Communication and Consultation Procedure, SQD/SMS/1.1, issue:1 ,rev: 0 dated 1 st August 2020. Evidence was available that records for information and responses were being maintained at each unit. Also sighted were letters from: - Enquiry register form external communities dated 29/09/2020 requesting to use Sg Tawing temple for religious activities. | 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 Tereh Palm Oil Mill (updated on 20/07/2020), Sg Tawing Estate (1/9/21) and FGV Paloh Estate for FY 2021 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 PKO buyers, government agencies such as Dept of Safety and Health, Indonesian Consulate, Labour Department, surrounding villages, nearby schools, clinics, etc. | Complied |

Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.

| | | | |
|--------------|---|--|-----------------|
| <p>1.2.1</p> | <p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p> | <p>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.</p> <p>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 Mirzafiz Sdn Bhd, Teo Tuan Kwee Sdn Bhd and Fica Sdn Bhd. During stakeholder 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. For example, latest briefing on ethical conduct was carried out on 5/4/21 (Sg Tawing). For Tereh Palm Oil Mill, the latest briefing was carried out on</p> <p>For FGV Paloh Estate, Code of Business Conduct & Ethics, policy no. FGV/GHR/POL/039, rev:4, date effective: 1/1/2020. Latest briefing was done on 1/7/21 to the estate workers during muster.</p> | <p>Complied</p> |
| <p>1.2.2</p> | <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> | <p>Complied</p> |

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

| | | | |
|---|---|---|-----------------|
| | | <ul style="list-style-type: none"> • Anti-Bribery Management System audit at Enggang Estate (26/10/20), Tereh Palm Oil Mill (26/10/20) and Sg Tawing Estate (25/10/20) • Internal audit by Kulim (M) Berhad SQD for Tereh complex from 8/8/2021 – 22/8/2021 • Contracts Administration Guidelines & 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; • Integrity ethics declaration signed by all levels of employees (management, workers). • Conflict of Interest Declaration forms signed by all levels of employees. | |
| <p>Principle 2: Operate legally and respect rights</p> | | | |
| <p>Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p> | | | |
| <p>2.1.1</p> | <p>(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -</p> | <p>Kulim (M) Berhad has established a register for all applicable legal and other requirement documented in the Kulim Group Compliance Framework.</p> <p>Inspection of records confirmed the CU have maintained compliance with statutory requirements such as Environmental Quality Act 1974, Occupational Safety and Health Act 1994, Factories and Machinery Act 1967, Employees’ Minimum Standard of Housing, Accommodations and Amenities Act 1990 and The Prevention and Control of Infectious Diseases (Measures Within the Infected Local Areas) Regulations 2020.</p> <p>The operating units continued to comply with the legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and Sustainability, Quality</p> | <p>Complied</p> |

| | | | |
|--|--|---|--|
| | | <p>Department. The operating units had obtained and renewed license and permits as required by the law. Noted, some of them had recently expired. Nonetheless, it has been renewed but due to the Movement Control Order the processing of renewal application at the issuing authority is hampered and hence the reissuing of the new permit / licence is delayed. Among others the licenses/permit viewed were:</p> <p><u>Tereh Palm Oil Mill</u></p> <ol style="list-style-type: none"> 1. MPOB license no. 500048604000 valid till 31/05/2022 2. Private water supply license no. SPAN/EKS/(PT)/800-4(1)/3/14 and SPAN/EKS/(PT)/800-4(2)/3/14 valid till 12/04/2023 3. Water abstraction license no. 07/A/Klg/115 and 08/A/Klg/040 valid till 31/12/2021 4. Private installation license no. 2021/00057 valid till 11/01/2022 <p><u>Sg. Tawing Estate</u></p> <ol style="list-style-type: none"> 1. MPOB license no. 53287800200 expired on 30/09/2021. The renewal application has been made on 15/08/2021 as per application receipt slip no. REF2-00083280. 2. Private water supply license no. SPAN/EKS/(PT)/800-4(1)/10/14 and SPAN/EKS/(PT)/800-4(2)/10/14 valid till 25/08/2023 3. Water abstraction license no. 07/A/Klg/043 valid till 31/12/2021 4. Private installation license no. 2021/01102 valid till 03/06/2022 | |
|--|--|---|--|

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

| | | | |
|--|--|---|--|
| | | <p>5. Electric fencing written approval no. ST(SJB)/PGR/JHR/2016/00004 dated 28/07/2016</p> <p>6. Diesel and Petrol permit no. J003061 valid till 22/09/2023</p> <p><u>Enggang Estate</u></p> <ol style="list-style-type: none"> 1. MPOB license no. 504229402000 expired on 31/07/2022. 2. Private water supply license no. SPAN/EKS/(PT)/800-4(1)/4/14 valid till 14/04/2023 3. Water abstraction license no. 07/A/Klg/021 valid till 31/12/2021 4. Private installation license no. 2021/01531 valid till 20/06/2022 5. Diesel and Petrol permit no. J002005 valid till 17/08/2021. Renewal has been conducted as per BLESS no. DN22021062181 6. Salary deduction permit TK(NJ)U-23 dated 21/11/2018 <ol style="list-style-type: none"> a. "Skim Khairat Keluarga" b. Workers union NUPW c. Lembaga Tabung Haji d. "Surau" donation <p><u>FGV Paloh Estate</u></p> <p>This operating unit too has established register of all applicable legal and other requirements and documented in the register of Legal and Other Requirements. Latest update was conducted on 12/02/2021. The operating units had obtained and renewed license</p> | |
|--|--|---|--|

| | | | |
|-------|---|--|----------|
| | | <p>and permits as required by the law. Among others the licenses/permit viewed were:</p> <ol style="list-style-type: none"> 1. MPOB license no. 560025002000 valid till 31/03/2022 2. Private water supply license no. SPAN/EKS/(PT)/800-4(1)/16/17 and SPAN/EKS/(PT)/800-4(2)/16/17 valid till 01/12/2023 3. Water abstraction license no. 07/A/Klg/059 valid till 31/12/2022 4. Energy Commission Private installation license no. 2020/02221 expired on 19/09/2021. The application of renewal has been done on 14/09/2021 as per payment voucher no. 350291770. 5. Diesel and Petrol permit no. J002029 valid till 10/10/2022. | |
| 2.1.2 | <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>The Tereh CU 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 their operation.</p> <p>The information gathered have centralised system for tracking any changes in the law via head office PIC internet website visits, annual internal audit by Group Sustainability Team in addition to individual OU (mill and estate) own evaluation for compliance. The updates are being communicated from the Head Office, Kulim (Malaysia) to the respective OU.</p> <p>At the OU the Person In Charge to ensure legal compliance are as below:</p> | Complied |

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

| | | Operating Unit | PIC | Job Position at OU | Date appointed | |
|-------|--|---|--------------------------|-----------------------------|-----------------------|----------|
| | | Tereh Palm Oil Mill | Mohd Saiful Bin Mansor | Assistant Manager (Overall) | 1.8.2021 | |
| | | Sg. Tawing Estate | Mohd Mazree B Mohd Tahir | Assistant Manager | 1.8.2021 | |
| | | Enggang Estate | Mohd Shawal B Ab Rahim | Assistant Manager | 1.8.2021 | |
| | | <p>Further safeguard includes the appointment of Person Responsible for Compliance at the Regional Office level whose duty is to ensure changes in laws and regulations are tracked, notified and assist implementation for each OU to comply. At this CU sighted the appointment letter of Cik Nuraini Binti Abdul Hamid, Executive Regional Controller Tereh Complex, ref. No. (38) KMB/RMCO/COM/GM/2020/37 dated 06-02-2020 issued by Head of Governance Division.</p> | | | | |
| 2.1.3 | <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 (forest reserves, villages, other oil palm companies, etc.) the normal practice of Kulim (M) Berhad to indicate the legal boundaries are through construction of boundary trenches or elephant trenches.</p> <p>No boundary stones were detected but location of marker pegs shown on each estate map were sampled, visited and verified to be within the perimeters of the estates.</p> <p>This was confirmed via the field visit at Sg. Tawing Estate and</p> | | | | Complied |

| | | | |
|--|--|--|----------|
| | | <p>Enggang Estate where the trenches and pegs were maintained and clearly visible.</p> <p>On-site verification confirmed that there has been no planting beyond the legal demarcated boundary areas of the mill and estates.</p> | |
| <p>Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p> | | | |
| 2.2.1 | <p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p> | <p>The operating units has listed all contracted parties and documented in Stakeholder List. The list updated every January includes internal stakeholders such as employees and workers union and external stakeholders such as suppliers, contractors, transporters, products buyers, head of local communities and other interested parties such as government department. Hospitals, schools and etc. the list was reviewed and updated on annually basis.</p> | Complied |
| 2.2.2 | <p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p> | <p>All contracts including FFB supplier, contain specific clauses on meeting applicable legal requirements.</p> <p>For FFB suppliers, the clauses on meeting applicable legal requirements were documented in clause 14 that stated as follows: "The supplier shall be bound to follow and adhere to all rules and regulations set forth by Government of Malaysia, all Kulim Group relevant business policies and compliance to respective mill's Certification Program Standards."</p> <p>Reviewed the sampled contracts as follows:</p> | Complied |

| | | | |
|--|---|---|----------|
| | | <ol style="list-style-type: none"> 1. Contract agreements between Kulim Plantations (M) Sdn. Bhd. with FGV Plantations (Malaysia) Sdn. Bhd. (Ladang Felda Paloh) dated 30/12/2020. 2. Contract agreements between Kulim Plantations (M) Sdn. Bhd. with Rantau Harmoni Sdn. Bhd. (As agent of Ladang Wawasan Paloh) dated 01/12/2020. | |
| 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 including FFB supplier, contain clauses on disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection were documented in clause 14 which read as follows:</p> <p>“The supplier represents and warrants that the supplier shall comply with applicable labour and employment laws regarding; and prohibit any form of child labour, forced and trafficked labour. Any eligible young labour will be employed only accordance with Children and Young Person (Employment) Act 1966.”</p> <p>Reviewed the sampled contracts as follows:</p> <ol style="list-style-type: none"> 1. Contract agreements between Kulim Plantations (M) Sdn. Bhd. with FGV Plantations (Malaysia) Sdn. Bhd. (Ladang Felda Paloh) dated 30/12/2020. 2. Contract agreements between Kulim Plantations (M) Sdn. Bhd. with Rantau Harmoni Sdn. Bhd. (As agent of Ladang Wawasan Paloh) dated 01/12/2020 | Complied |
| <p>Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p> | | | |
| 2.3.1 | <p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins | <p>Tereh mill received only crop from the Kulim Plantation Estates and its own supply bases within the certification scope, or other if any</p> | Complied |

| | <ul style="list-style-type: none"> Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder One or more supporting documents for claims Valid MPOB license <p>- Critical (Major) compliance -</p> | <p>are diversion from the sister mills (RSPO Certified) as results of mill breakdown or annual maintenance.</p> <p>All estates from the same certification scope possessed the following information were sighted and verified during the audit</p> <p>1. Geo locations are as follows:</p> <table border="1" data-bbox="1182 547 1901 746"> <thead> <tr> <th>Estate name</th> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>Sg. Tawing</td> <td>(2° 17' 46.75" N</td> <td>103° 21' 11.58" E</td> </tr> <tr> <td>Enggang</td> <td>2° 16' 12.10" N</td> <td>103° 25' 36.58" E</td> </tr> <tr> <td>Felda Paloh</td> <td>2° 14' 51.072" N</td> <td>103° 24' 49.02" E</td> </tr> </tbody> </table> <p>2. All FFB from the supply base estates was supported by the delivery documents and weighbridge tickets.</p> <p>3. Valid land title with ownership status (refer indicator 4.4.1)</p> <p>4. Valid MPOB licence</p> <p>a. Felda Paloh Estate: MPOB license no. 560025002000 valid till 31/03/2022</p> <p>b. Wawasan Estate: MPOB license no. 503879302000 valid till 28.02.2021</p> | Estate name | Latitude | Longitude | Sg. Tawing | (2° 17' 46.75" N | 103° 21' 11.58" E | Enggang | 2° 16' 12.10" N | 103° 25' 36.58" E | Felda Paloh | 2° 14' 51.072" N | 103° 24' 49.02" E | |
|---|---|---|-------------|----------|-----------|------------|------------------|-------------------|---------|-----------------|-------------------|-------------|------------------|-------------------|--|
| Estate name | Latitude | Longitude | | | | | | | | | | | | | |
| Sg. Tawing | (2° 17' 46.75" N | 103° 21' 11.58" E | | | | | | | | | | | | | |
| Enggang | 2° 16' 12.10" N | 103° 25' 36.58" E | | | | | | | | | | | | | |
| Felda Paloh | 2° 14' 51.072" N | 103° 24' 49.02" E | | | | | | | | | | | | | |
| 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>Inspected and verified delivery records showed there is no indirect sourced FFB at Tereh Palm Oil Mill. All FFB supplied are from Kulim (M) Berhad's own estates and its managed entities. They come from own estate (Tereh Selatan, Tereh Utara, Selai, Enggang, Sg Tawing, Mutiara, Sg Sembrong, Rengam) and 2 managed entities: Ladang Felda Paloh and Wawasan Paloh (YPJ Oil Palm).</p> | Complied | | | | | | | | | | | | |
| <p>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</p> | | | | | | | | | | | | | | | |

| Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability. | | | |
|--|--|--|----------|
| 3.1.1 | <p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p> | <p>Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. Sighted the annual budget FY 2021 and business plan FY 2022 – FY 2026. The business plan includes:</p> <p><u>Plantations</u></p> <ol style="list-style-type: none"> 1. Production – FFB tonnes 2. General Charges <ol style="list-style-type: none"> a. Supervision b. Rent, rates and taxes c. Office expense d. Maintenance e. Water and lights f. Labour welfare g. Medical 3. Maintenance 4. Harvesting <p><u>Palm Oil Mill</u></p> <ol style="list-style-type: none"> 1. FFB yield, 2. CPO, 3. OER and KER, 4. General Charges <ol style="list-style-type: none"> a. Supervision b. Rent, rates and taxes c. Office expense | Complied |

| | | <ul style="list-style-type: none"> d. Maintenance e. Water and lights f. Labour welfare g. Medical <p>5. Production</p> <p>6. Maintenance</p> | | | | | | | | | | | | | | | | | | | | | | | | | |
|---------------------|---|--|----------------|------|---------------------|------------|----------------|------------|----------|------|------|------|------|------|------------|------|--------|------|------|--------|-----------|------|--------|------|------|------|----------|
| 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 long range replanting program. Replanting planned for the palm older than 25 years, non-performance field (yield) and ganoderma infected palm. Observed the replanting program for the next 5 financial year as follows:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>Enggang</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Sg. Tawing</td> <td>0.00</td> <td>142.70</td> <td>0.00</td> <td>0.00</td> <td>117.67</td> </tr> <tr> <td>FGV Paloh</td> <td>0.00</td> <td>564.65</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> </tbody> </table> | Estate | 2021 | 2022 | 2023 | 2024 | 2025 | Enggang | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | Sg. Tawing | 0.00 | 142.70 | 0.00 | 0.00 | 117.67 | FGV Paloh | 0.00 | 564.65 | 0.00 | 0.00 | 0.00 | Complied |
| Estate | 2021 | 2022 | 2023 | 2024 | 2025 | | | | | | | | | | | | | | | | | | | | | | |
| Enggang | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | | | | | | | | | | | | | | | | | | | | | | |
| Sg. Tawing | 0.00 | 142.70 | 0.00 | 0.00 | 117.67 | | | | | | | | | | | | | | | | | | | | | | |
| FGV Paloh | 0.00 | 564.65 | 0.00 | 0.00 | 0.00 | | | | | | | | | | | | | | | | | | | | | | |
| 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>Management review was conducted on annual basis by Operating Unit as per established SOP.</p> <p>Latest management review meeting was conducted at each operating units as follows:</p> <table border="1"> <thead> <tr> <th>Operating Unit</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Tereh Palm Oil Mill</td> <td>09/09/2021</td> </tr> <tr> <td>Enggang Estate</td> <td>06/08/2021</td> </tr> </tbody> </table> | Operating Unit | Date | Tereh Palm Oil Mill | 09/09/2021 | Enggang Estate | 06/08/2021 | Complied | | | | | | | | | | | | | | | | | | |
| Operating Unit | Date | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Tereh Palm Oil Mill | 09/09/2021 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Enggang Estate | 06/08/2021 | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | | | | |
|---|---|--|------------|--|----------|
| | | Sg. Tawing Estate | 19/07/2021 | | |
| | | FGV Paloh Estate | 29/08/2021 | | |
| <p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p> | | | | | |
| 3.2.1 | <p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p> | <p>Sighted the annually documented continuous improvement plan for environmental and social impacts and opportunities at each operating unit. Verified samples of continuous improvement plan for 2021 as per below:</p> <p><u>Palm Oil Mill</u></p> <ol style="list-style-type: none"> 1. Upgrading of worker’s quarters (4 units) 2. Water catchment/holding 15,000 m³ 3. Installation of integrated biogas plant 4. Build new furrow 5. Build POME emergency pond 6. Renewal of nut polishing drum 7. Install fire fighting system <p><u>Kulim Plantation Estate</u></p> <ol style="list-style-type: none"> 1. Furniture upgrade for housing/quarters 2. Install safety signage at workstation 3. Rebuild and repair elephant trenches 4. Repair of FFB ramp <p><u>FGV Paloh Estate</u></p> <ol style="list-style-type: none"> 1. Increase the area for cattle grazing 2. Increase the area for beneficial plant planting 3. Maximise recycling and reduce waste | | | Complied |

| | | | |
|--|---|--|----------|
| | | 4. Increase/repair infrastructure | |
| 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>PROCEDURAL NOTE: 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. - Minor Compliance -</p> | <p>RSPO metric template version 2.1 is used for the reporting of Tereh Palm Oil Mill certification unit's metrics (economic, social and environment). Data reporting period is January to December 2020 for (social and environment metrics) and economic metrics from September 2020 – August 2021 (counting back 2 months from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics.</p> | Complied |
| Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored. | | | |
| 3.3.1 | <p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place. - Critical (Major) compliance -</p> | <p>Kulim (M) Berhad has established Standard Operating Procedure as guidance for daily operation for the mills and estates. The mill and estates holds 3 SOPs as follows: 1. Mill Quality Management updated 2018 (for Palm Oil mill) 2. Agriculture Manual updated 2019 (for Plantations) 3. Sustainable Management System dated 2020 4. Safety Work Procedure dated 2009 For FGV Paloh Estate, the SOP for the estate operations are available which follows the FGV Plantations SOP. There are levels of the documentation identified as follows; 1. Manual Ladang Sawit LESTARI revision 3 dated 01/09/2017 2. Occupational Safety and Health Guideline dated 01/02/2020 and addition issue dated 12/06/2020</p> | Complied |

| | | | |
|-------|---|--|----------|
| | | The management has established a system to monitor the mill and estates operation such as Internal Audit, Operational Checklist, Workplace Inspection, Management Review Meeting and Mill/Estates Inspection Visit. | |
| 3.3.2 | A mechanism to check consistent implementation of procedures is in place. - Minor Compliance - | The following mechanism is available and adopted as standard practices and procedures in the mill and estates operations. Tereh Palm Oil Mill <ol style="list-style-type: none"> 1. Mill inspectorate Visit program 2x /year 2. Internal audit by Sustainability Unit 2x /year 3. Task Force visits 4. Monthly and weekly ad hoc meetings 5. Daily /monthly production & financial report 6. Daily and monthly lab analysis report. 7. Daily supervision by the mill Supervisors/Executives Supply Base Estates <ol style="list-style-type: none"> 1. Plantation Inspectorate Visit program 2x /year 2. Internal audit by Sustainability Unit 2x /year 3. Task Force visits 4. Monthly and weekly ad hoc meeting 5. Daily /monthly production & financial report 6. Daily supervision by the field staff/Executives. | Complied |
| 3.3.3 | Records of monitoring and any actions taken are maintained and available. - Minor Compliance - | Kulim Plantations established mechanism to check the effective implementation of the procedure. Among the mechanism such as Mill/Plantation Advisor Visit, Agronomist visit and Internal Audit. Reviewed the records as follows: Tereh Palm Oil Mill | Complied |

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

| | | | |
|--|--|---|--|
| | | <ol style="list-style-type: none"> 1. Plantation Inspectorate visit no 01/2021 on 26 - 27/04/2021. Refer report no. MKI/LTM/1/2021 dated 06/05/2021. 2. RSPO, MSPO and ISCC Internal remote and on-site audit report for audit dated 08 – 22/08/2021. <p>Sg. Tawing Estate</p> <ol style="list-style-type: none"> 3. Plantation Inspectorate visit no. 01/2021 on 30 - 31/03/2021. Refer report no. IB/LST/1/2021 dated 01/04/2021. <ol style="list-style-type: none"> 1. RSPO, MSPO and ISCC Internal remote and on-site audit report for audit dated 11/07/2021 – 08/08/2021. 2. Plantation Inspectorate visit no. 01/2022 on 23/01/2022. Refer report no. ARM/LST/1_2022 dated 28/01/2022. 3. Agronomist visit report no 1/21 on 14 – 15/07/2-21 dated 22/09/2021. <p>Enggang Estate</p> <ol style="list-style-type: none"> 1. Plantation Inspectorate visit no 01/2021 on 16 and 17/03/2021. Refer report no. MSAB/LE/1/2021 dated 29/03/2021. 2. RSPO, MSPO and ISCC Internal remote and on-site audit report for audit dated 08 – 22/08/2021. 3. Plantation Inspectorate visit no 02/2021 on 16 and 18/03/2021. Refer report no. IB/LS/2/2021 dated 22/08/2021. 4. Agronomist visit report no 1/21 on 07 – 08/07/2-21 dated 27/07/2021. <p>FGV Paloh Estate</p> | |
|--|--|---|--|

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

| | | | |
|--|---|---|-----------------|
| | | <ol style="list-style-type: none"> 1. Plantation Controller visit report dated 14/02/2020. 2. RSPO, Internal remote and on-site audit report for audit dated 08 – 29/08/2021. 3. Agronomist visit for visit dated 07/04/2021. | |
| <p>Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p> | | | |
| <p>3.4.1</p> | <p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -</p> | <p>No new planting in both estates within Tereh Palm Oil Mill and supply base.</p> <p>Environmental</p> <p>The operating units have conducted the aspects and impacts analysis and documented in the Environmental Risk Assessment from. The analysis was reviewed on annually basis. latest review was conducted as follows:</p> <p>Tereh Palm Oil Mill Latest EIA review was conducted on 15/08/2021. Refer form LTM-EIA-2021</p> <p>Sg. Tawing Estate Latest EIA review was conducted on 16/08/2021. Refer form KULIM-LST-2021</p> <p>Enggang Estate Latest EIA review was conducted on 16/08/2021. Refer form KULIM-LE-2021</p> <p>FGV Paloh Estate Latest review was conducted in January 2021. Refer form FGVPM/IMS/16/1.6 Pind 1</p> <p>Sosial</p> | <p>Complied</p> |

| | | | |
|-------|---|--|----------------|
| | | <p>Sustainability & Quality Department has carried out Social Impact Assessment on 15/9/21 for Tereh Palm Oil Mill certification unit. The assessment has involved participation of contractors and internal workers. Checklist Interview was utilized during interview with the stakeholders for SIA. The social impact register is developed based on the scoring of frequency, consequence and likelihood. Social Management Plan will be developed after the social impact register established. There is no new planting in the 3 estates. This is verified through the following document/facts:</p> <p>a) Hectare statement compared to the previous year. b) Interviews with the management</p> | |
| 3.4.2 | <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.</p> <p>- Minor Compliance -</p> | <p>Environmental</p> <p>The operating units have established the Environmental Management Plan base on the Environmental Risk Assessment conducted. The management plan was reviewed on annually basis during Environmental Risk Assessment Review. Reviewed the latest Environmental Improvement Plan dated 27/01/2022.</p> <p>Social</p> <p>The Social & Environment Management Plan for period 2020 is available for the CU. The plan among others incorporated the objectives, category, action, frequency, person in charge and monitoring period. Identified issues and mitigation plan were summarized under Social Management Plan for 2021.</p> | Complied |
| 3.4.3 | <p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p> | <p>Environmental</p> <p>The operating units have established the Environmental Management Plan base on the Environmental Risk Assessment conducted. Reviewed the implementation of the management plan as follows:</p> | Non-compliance |

| | | | |
|--|--|--|--|
| | | <p>Tereh Palm Oil Mill</p> <ol style="list-style-type: none"> 1. The mill monitor the Dewatering Sludge Screw Press on daily basis. Reviewed the monitoring records for the month of September 2021. 2. To ensure the awareness on ERP for bund rupture, the mill continuously conducted training to all the workers. Reviewed the latest training records for Emergency Response Plan on bund rupture and oil spillage dated 09/02/2021. 3. The mill continuously provide awareness on the scheduled waste management. Reviewed the the scheduled waste training records dated 31/01/2021, 03/03/2021 and 14/03/2021. 4. The mill maintain the records of inventory of scheduled waste generated by mill operation and notify to DOE through ESWISS. Reviewed the inventory records for the month of February 2022, January 2022, December 2021, November 2021 and October 2021. 5. The mill monitored the ESP performance on daily basis. Reviewed the monitoring records in ESP Performance Monitoring Data Recording dated 14/12/2021, 12/12/2021, 21/10/2021, 19/10/2021, 24/09/2021 and 23/09/2021. The reading recorded were as per Environmental Quality (Clean Air) Regulation 2014 standard at 150 mg/m³. 6. The mill conducted stack sampling twice a year. Reviewed the latest stack sampling conducted on 30/11/2021. Refer report no. Tereh6-6/11/2021 dated 06/12/2021. 7. The mill conducted tank and machine on timely basis to ensure no leakage and spillage. For machinery, the mill conducted inspection on monthly basis. Reviewed the inspection records documented in Electrical Workshop Preventive and | |
|--|--|--|--|

| | | | |
|--|--|---|--|
| | | <p>Maintenance Schedule for the month of January and February 2022. For oil tank, the inspection was conducted on quarterly basis prior to Safety and Health committee meeting. Reviewed the inspection records dated 12 – 13/12/2021.</p> <p>Sg. Tawing Estate</p> <ol style="list-style-type: none"> 1. The estate continuously provided training to the workers on empty pesticides containers to ensure the waste were disposed appropriately. Reviewed the latest training conducted on 19/05/2021. 2. The estate conducted Inlet and Outlet water sampling on monthly basis after conducting fertiliser application. Reviewed the water sampling records no. WI/2021/09/444 dated 23/09/2021, WI/2021/08/291 dated 22/08/2021, and WI/2021/07/251 dated 30/07/2021. 3. The estate conducted buffer zone monitoring on quarterly basis. Reviewed the buffer zone monitoring records dated 05/07/2021. 4. The estate conducted Genset Inspection on monthly basis. Reviewed the inspection records dated 17/09/2021, 13/10/2021, 18/11/2021 and 15/12/2021. 5. The estate conducted domestic waste collection twice a week. Reviewed the collection records dated 10/01/2022, 13/01/2022, 18/02/2022 and 21/02/2022. Empty chemical containers were triple rinse, reused back as pre-mixing chemical containers or punctured and stored at designated store. Reviewed the inventory records for chemical containers for Blocus, Glyphosate, Storm and Foxil for the month of December 2021, January and February 2022. | |
|--|--|---|--|

| | | | |
|--|--|--|--|
| | | <p>6. To control soil erosion, the estate planted Guatemala Grass at the identified area. Reviewed the completed Guatemala planting records in Oct – Nov 2021.</p> <p>Selai Estate and Enggang Div.</p> <ol style="list-style-type: none"> 1. The estate continuously conducted training to ensure workers awareness on the waste management. Reviewed the training records for domestic waste training dated 09/03/2021 2. To control the erosion, the estate has established Vetiber/geatemala planting program. Reviewed the completed Vetiber/geatemala planting as at July 2021. 3. The estate conducted PCD inspection and cleaning on weekly basis. Reviewed the inspection records dated 18/11/2021, 25/11/2021, 30/11/2021, 06/12/2021 and 16/12/2021. 4. The estate conducted electrical genset inspection on monthly basis by Visiting Engineer appointed with competency no. PE-T-1-B-008-2015. Reviewed the visiting records for the month of August, September and October 2021. <p>FGV Paloh Estate</p> <ol style="list-style-type: none"> 1. The estate monitor the inventory of empty chemical containers generated and recorded in "Binkad Tong Kosong & Bilasan 3 Kali". Reviewed records for Triclopyr, Nurelle, Sodium, Decis Deltamethrin, Cypermethrin and miracle for the month of November 2021, December 2021 and January 2022. 2. The estate disposed the empty containers at centralised collection centre at FGV Maokil Estate 6. Reviewed the latest disposal records dated 21/01/2021 and 17/02/2022. The collection centre has submitted a copy of disposal records to | |
|--|--|--|--|

| | | | |
|--|--|--|--|
| | | <p>the estate. Reviewed the consignment note no. 0163602 dated 28/10/2021.</p> <p>3. The estate monitor the diesel usage on monthly basis. Reviewed the diesel usage/FFB production FY 2020 recorded at 11.35 L/ton FFB and as at todate September 2021, diesel usage/FFB production recorded at 11.49 L/ton FFB.</p> <p>Sosial</p> <p>The last review of the social management plan was on 15/09/2021 for Tereh Pom certification unit with identification of negative and positive impacts. Mitigation and promotion actions were taken accordingly to the impacts identified. One of negative issue identified related to grocery price at sundry shop. As part of mitigation plan, periodic monitoring will be done by comparing the price at neighboring estate and normal retail price. The process is still on-going.</p> <p>The Social/Environmental Action Plan 2020/21 available for each units were available having information i.e issues, management plan, PIC and time frame. The input are gathered from the meeting minutes</p> <ul style="list-style-type: none"> a) Gender Committee, NUPW, b) Safety Meeting, c) Complaint & Request from internal & external stakeholders d) Management meeting at estates/mill and regional level. e) Dialogue during the morning muster. <p>FGVPM Ladang Paloh</p> <p>SIA management plan (2/21, dated 20/9/21) has not comprehensively identified pertinent issues related to:</p> <ul style="list-style-type: none"> i) Expensive pricing of goods at sundry shop | |
|--|--|--|--|

| | | | |
|--|---|---|----------|
| | | <p>ii) Communication problem, repatriation of the spokesperson/worker's representative iii) Insufficient medical benefit limit (outpatient) iv) "Kadar Upah Kerja" rate/quantity for piece rated task (bil. 7 for 2022) v) Understanding of salary calculation in the pay slip. The above issues were highlighted during interview with workers representative (Bangladesh, Indonesia and India) and a group of Indian and Bangladeshi workers. Thus, the regular review and update process of SIA management plan was not effectively demonstrated in a participatory way. Hence, a major NC was issued.</p> | |
| Criterion 3.5: 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. - Minor Compliance -</p> | <p>Reviewed and verified during the audit were the following SOPs:</p> <ul style="list-style-type: none"> - 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. - 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. | Complied |

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

| | | | |
|-------|---|---|----------|
| | | <p>For FGV Paloh Estate, guidelines for local and foreign workers recruitment available for verification:</p> <ul style="list-style-type: none"> - <i>Garis Panduan Proses Temuduga Pekerja Tempatan Sektor Perladangan</i>, manual no. FGV/JTK/MAN/001-4 rev:1 dated 24th March 2021. - Guideline and Procedure for Responsible Recruitment of Foreign Workers, endorsed by Group CEO, FGV Holding Berhad dated 27/6/2019 | |
| 3.5.2 | <p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p> | <p>Based on the files sighted, Tereh Palm Oil Mill and its supply base are able to demonstrate the implementation of the employment procedures, and records are maintained. Records for Malaysian workers include job application form, resume, copies of relevant certificates, NRIC and medical reports. For foreign workers, records include copies of passports, request for salary deductions for paying electricity bills, mosque funds, and consent for passports to be kept in the office. Among the files sighted belong to the following employees:</p> <p><u>Tereh Palm Oil Mill</u></p> <p>Worker ID 612403 – joined date 14/12/2021, induction process completed, medical check-up</p> <p>Worker ID 612394 – joined date 18/07/2021</p> <p><u>Sg Tawing Estate</u></p> <p>Worker ID 683226 – joined date 6/2/2022</p> <p>Worker ID 683221 – joined date 24/11/2021 (female), medical check-up checklist, no requirement for UPT check.</p> | Complied |

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

| | | | |
|--|---|--|-----------------|
| | | <p>Worker ID 683223 – joined date 24/01/2022 (female), medical check-up checklist, no requirement for UPT check.</p> <p><u>FGV Paloh Estate</u> ID no. LW04520066, date joined 1/1/21, medical check-up report, UPT check positive and job offered.</p> | |
| <p>Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p> | | | |
| <p>3.6.1</p> | <p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -</p> | <p>Each visited Operating Unit has conducted their risk assessment covering both main and support operations. The assessment was conducted using HIRARC, which as per SOP, must be reviewed at a minimum once a year, or following occurrence of accident or changes in operation.</p> <p>Reviewed the risk assessment as follows:</p> <p><u>Tereh Palm Oil Mill</u></p> <ol style="list-style-type: none"> 1. Latest HIRARC review was conducted on 15/10/2021 with no changes done since the last review. 2. CHRA was conducted on 28/03 – 13/08/2018 by DOSH Registered assessor, reg. no. JKPP HQ/03/ASS/00/154. Refer report no. JKPP HQ/03/ASS/00/154-2018/057. <p><u>Sg. Tawing Estate</u></p> <ol style="list-style-type: none"> 1. Latest HIRARC review was conducted on 25/08/2021 with no changes done since the last review. 2. CHRA was conducted on 28/03 – 13/08/2018 by DOSH Registered Assessor, reg. no. JKPP HQ/03/ASS/00/154 and HQ/12/ASS/00/309. Refer report no. JKPP HQ/03/ASS/00/154- | <p>Complied</p> |

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

| | | <p>2018/035. Additional CHRA was conducted by the same assessor ion 22/12/2020 – 31/01/2021. Refer report no. JKPP HQ/03/ASS/00/154-2021/023.</p> <p><u>Enggang Estate</u></p> <ol style="list-style-type: none"> 1. Latest HIRARC review was conducted on 01/04/2021 with changes done to the office operation due to accident occur in March 2021. 2. CHRA was conducted on 28/03 – 13/08/2018 by DOSH Registered Assessor, reg. no. JKPP HQ/03/ASS/00/154 and HQ/12/ASS/00/309. Refer report no. JKPP HQ/03/ASS/00/154-2018/036. Additional CHRA was conducted by the same assessor ion 22/12/2020 – 31/01/2021. Refer report no. JKPP HQ/03/ASS/00/154-2021/005. <p><u>FGV Paloh Estate</u></p> <ol style="list-style-type: none"> 1. Latest HIRARC review was conducted on 23/06/2021 with changes at the FFB harvesting and collection operation due to accident occur on 16/06/2021. 2. CHRA was conducted on 22/07/2020 by DOSH Registered Assessor, reg. no JKPP HQ/10/ASS/00/8. Refer report no. JKPP HQ/10/ASS/00/8 2020/056. | | | | | | | | | |
|-------|--|--|----------------------------------|------|----------|----------------------------------|--|--|--|---|----------|
| 3.6.2 | <p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</p> | <p>The plan effectiveness was monitored at various intervals, for example:</p> <table border="1" data-bbox="1151 1276 1921 1378"> <thead> <tr> <th>No.</th> <th>Item</th> <th>Activity</th> <th>Monitoring interval monitored by</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td>/</td> </tr> </tbody> </table> | No. | Item | Activity | Monitoring interval monitored by | | | | / | Complied |
| No. | Item | Activity | Monitoring interval monitored by | | | | | | | | |
| | | | / | | | | | | | | |

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

| | | | | | |
|--|--|---|--|---|---|
| | | 1 | Shovel and tractor Checklist | Inspection | Daily / shovel and Tractor driver |
| | | 2 | Wearing of PPE | Reminders and Observation | During roll-call/ Assembly Mandore/Supervisor / Assistant Manager |
| | | 3 | First Aid Box | Inventory and record checks | Monthly / Estate Hospital Assistant or Medical Assistant |
| | | 4 | Employees' Housing Inspection | Site inspection, internal and external sightings | Weekly / Estate Hospital Assistant or Medical Assistant |
| | | 5 | DOSH Equipment and Machinerics Certificate of Fitness | Inspection / Test | Monthly for 15-monthly renewal / Assistant Manager |
| | | 6 | a. OSH objectives, targets and programmes. b. OSH Committee meeting and Workplace Inspection. | Track and report Attend meeting and conduct inspection | Monthly / Safety and Health PIC 3-monthly / Mill or Estate Manager and Appointed Committee members |
| | | 7 | Employees Audiometric Test | Arrange to conduct examination | Annually / Estate Hospital Assistant or Medical Assistant |
| | | 8 | Medical surveillance | | |
| | | 9 | Up to date OSH Legal Compliance | Track changes in law, update, train | Annually or when there is changes in law / Assistant |

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

| | | | | |
|----|--|--|---------------------------|--|
| | | | and review for compliance | Manager (Mill and Estate) and Compliance Executive from Regional Office |
| 10 | 5-yearly Chemical Health Risk Assessment | Arrange timely assessment by DOSH Registered Competent Person. Act on recommended actions. | | 3-months before expiry date / Assistant Manager (Mill and Estate) As soon as Possible / Assistant Manager |
| 11 | OSH Management System | Review documentation HIRARC review | | Annually or after accident / Assistant Manager and HQ PIC |
| 12 | Risk Management | Identify High Risk Area Preventive Maintenance | | Annually / Assistant Manager and HQ PIC Annually / Assistant Manager and Workshop foreman |
| 13 | Accident Investigation/ Reporting | Conduct Investigation Report Accident to DOSH JKKP submission 8/6 | | As soon as accident occur / Safety Committee Immediate for death. Others follow NADOPOD Regulation 2004 / Assistant Manager |

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

| | | | | | |
|---|---|----|--|--|--|
| | | | | After completion of accident investigation / Assistant Manager | |
| | | 14 | Safety and Health Job related training (see Annual Safety & Health Plan) e.g. Chemical handling, Emergency Response and Fire Drill, Pest & Disease, Harvesting, Spraying, Boiler Operation, Working at Height, Lock Out Tag Out, Use of PPE. | Respective Operating Unit PIC to arrange. Conduct workers post training assessment to evaluate their understanding and effectiveness of training given. | As and when notified by HQ Coordinator for centralised training. Monthly for courses conducted by own Assistant Manager. 1-2 months after attend training / Immediate Supervisor. |
| Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained. | | | | | |
| 3.7.1 | <p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p> | | <p>Tereh Palm Oil Mill certification unit has established an annual training program with latest training program for year 2021 that covers all aspects of the RSPO Principles and Criteria. The training needs identification and program were made available for verification at all visited sites. There were 9 courses related to Safety and Health, 21 modules related to RSPO P&C Procedures and Work Instructions.</p> <p>Awareness and training program had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained e.g. in understanding of RSPO, chemical handling, safe working practices and the correct use of PPE.</p> | | Complied |

| | | | |
|--------------|--|---|-----------------|
| <p>3.7.2</p> | <p>Records of training are maintained. - Minor Compliance -</p> | <p>The operating units maintained on file the training records conducted. Data captured include date training held, course name, trainers name, venue, list of attendees and training evaluation form. Reviewed the training records as follows:</p> <p><u>Tereh Palm Oil Mill</u></p> <ol style="list-style-type: none"> 1. Ramp and steriliser station training dated 02/01/2021 and 02/02/2021 2. Weighbridge station training dated 01/03/2021 3. Thresher and press station training dated 16/02/2021 and 23/02/2021 4. Shovel and tractor driver training dated 01/02/2021 5. Laboratory, sampling and testing records training dated 03/03/2021 6. CPO sample analysis training dated 03/05/2021 7. Scheduled waste management training dated 31/01/2021, 03/03/2021 and 14/03/2021 8. FFB grading training dated 19/03/2021 <p><u>Sg. Tawing Estate</u></p> <ol style="list-style-type: none"> 1. Safety and health policy briefing dated 12/02/2021 2. Prohibition of open burning briefing dated 28/01/2021 3. Domestic waste segregation training dated 17/02/2021 4. HCV and biodiversity training dated 09/02/2021 5. Safety work procedure for tractor, lorry and MB driver training dated 17/02/2021 6. RSPO, MSPO, ISCC for contractors workers training dated 25/01/2021 | <p>Complied</p> |
|--------------|--|---|-----------------|

| | | | |
|-------|--|--|----------|
| | | <ul style="list-style-type: none"> 7. Buffer zone briefing dated 26/01/2021 8. Spraying and chemical handling dated 15/03/2021 9. PPE Usage dated 14/04/2021. <p><u>Enggang Estate</u></p> <ul style="list-style-type: none"> 1. Manuring – Manual application and manure at buffer zone area training dated 05/02/2021 2. Spraying training dated 29/06/2021 3. Scheduled waste management training dated 09/03/2021 4. Chemical handling training dated 29/06/2021 5. PCD cleaning training dated 20/04/2021 6. Empty pesticide containers triple rinsing training dated 29/06/2021 <p><u>FGV Paloh Estate</u></p> <ul style="list-style-type: none"> 1. Spraying training dated 02/02/2021 2. Harvesting training dated 04/02/2021 3. Fire drill/firefighting training dated 22/04/2021 4. Pesticides and chemical handling training dated 24/05/2021 5. Domestic waste handling training dated 11/07/2021 6. Buffer zone management training dated 12/07/2021 | |
| 3.7.3 | <p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p> | <p>SCCS training was conducted on 15.12.2021 given on-line by the Assistant Manager from Kulim Group Sustainability Quality Department for personnel carrying out tasks critical to the effective implementation of the SCCS. It was attended by Mill and Estate Representatives.</p> | Complied |

| | | | |
|--|---|--|----------|
| <p>Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C). However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p> | | | |
| 3.8.1 | <p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</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>Tereh Palm Oil Mill only receives certified FFB from own certified supply base. Therefore, qualifies for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.</p> | Complied |
| 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>Tereh Palm Oil Mill only receives certified FFB from own certified supply base. Therefore, qualifies for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.</p> | Complied |
| 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&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)</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_PO1000001263 License valid until 22/01/2022 Member category : Oil Mill</p> | Complied |
| 3.8.5 | <p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ol style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. | <p>Kulim (Malaysia) Berhad has developed Traceability Procedure (Doc. No.: SQD/SMS/1.2, Issue No. 1, Rev. No.: 05 dated 1/8/20) and CSPO & CSPK Supply Chain Procedure (Doc. No.: MKTG 04, Rev. 01 dated January 2021) are referred to fr RSPO SCCS implementation.</p> <p>Seen the records that included in the procedure are as below:</p> <ol style="list-style-type: none"> i. Weighbridge tickets ii. Training records iii. Internal audit report iv. Invoice and contracts v. Delivery and storage records vi. Daily Production Report <p>Training records for RSPO Supply Chain & Stamping was sighted where the training was conducted on 12/10/2020 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>Head of each operating unit appointed as person responsible for all certification inclusive of RSPO SCCS. Responsibility of the</p> | Complied |

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

| | | | |
|-------|---|--|----------|
| | | <p>person-in-charge has clearly stated in the appointment letter, SQD/ADMIN/019/21 dated 19/9/2021.</p> <p>Kulim (Malaysia) Berhad has developed Traceability Procedure (Doc. No.: SQD/SMS/1.2, Issue No. 1, Rev. No.: 05 dated 1/8/20) CSPO & CSPK Supply Chain Procedure (Doc. No.: MKTG 04, Rev. 01 dated January 2021 which has covered the process of incoming of FFB and ensuring no contamination in the IP mill.</p> | |
| 3.8.6 | <p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p> | <p>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 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 8-22/8/2021 by SQD team. There no 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> | Complied |
| 3.8.7 | <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"> • FFB despatch no. (DB A No. 63640) • Estate's names (Sg Tawing Estate) • Date of delivery (30/7/21) • Field No. (field P04, P12) | Complied |

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

| | | | |
|-------|--|--|----------|
| | | <ul style="list-style-type: none"> • Lorry no. JBJ 3377 • Weight (13.8 mt) • WB ticket: 124395 • Traceability Identification: RSPO certified FFB (RSPO 613086) • FFB despatch no. (DB A no. 01491) • Estate's names (Mutiara Estate) • Date of delivery (30/6/21) • Field No. (field P03, P97) • Lorry no. JPV6425 • Weight (43.20 mt) • WB ticket: 121931 • Traceability Identification: RSPO certified FFB (RSPO 6130876) Diversion from other certified management unit, Sedenak certification unit (RSPO 537837) • FFB despatch no. (DB A no. 18238) • Estate's names (Kuala Kabong Estate) • Date of delivery (3/8/21) • Field No. (field P99, P00, P01, P02) • Lorry no. WFP 4832 • Weight (26.87 mt) • WB ticket: 124780 • Traceability Identification: RSPO certified FFB (RSPO 537837) | |
| 3.8.8 | <p>Sales and Goods Out</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</p> | <p>Tereh Palm Oil Mill ensured the required information is available in document form. Sampled of CPO contract: CPOIP-M20091 dated 26/11/20, quantity 6,000 mt (delivery month – December 2020)</p> <ul style="list-style-type: none"> • The name and address of the buyer; XXX • The name and address of the seller: The loading or shipment/ delivery date; e.g. 22/9/20 | Complied |

| | | | |
|--|---|---|--|
| | <p>palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. | <ul style="list-style-type: none"> • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); Crude Palm Oil (CPO) RSPO IP • The quantity of the products delivered; e.g. 42.10 mt • Any related transport documentation; e.g. Despatch note e.g. #C01329 • Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 613086 • A unique identification number: palm trace no. TR-5328b9c4-3c63 • Available in a few forms e.g. DN no., seal no., etc. <p>Tereh Palm Oil Mill ensured the required information is available in document form. Sampled of PK contract: MPOK 2037 IP dated 29/10/20, quantity 2,500 mt (delivery month – September 2020)</p> <ul style="list-style-type: none"> • The name and address of the buyer; XXX • The name and address of the seller: Tereh Palm Oil Mill • The loading or shipment/ delivery date; e.g. 29/10/20 • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); Palm Kernel (PK) RSPO IP • The quantity of the products delivered; e.g. 42.10 mt • Any related transport documentation; e.g. Despatch note e.g. #K01329 • Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 613086 • A unique identification number: palm trace no. TR-1f5d8ad1-103b • Available in a few forms e.g. DN no., seal no., etc. | |
|--|---|---|--|

| | | | |
|--------|--|--|----------|
| 3.8.9 | <p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>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>No CPO and PK process, bulking facilities outsourced by the mill. Transporter for PK was assigned by buyer. For CPO, contract agreement with a few contractors as per below:</p> <p>i) Teo Tuan Kwee, MPSB/G1/2 (2020) (TTK) dated 15th June 2020. Date commencement: 1st June 2020, completion date: 31st May 2023.</p> <p>ii) Semai Setia Transport, MPSB/G1/6/2(2020) (SS) dated 15th June 2020. Date commencement: 1st June 2020, completion date: 31st May 2023.</p> <p>Under clause 6 on the contract; <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> | Complied |
| 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 listed under stakeholder list 1 st August 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 |

| | | | |
|---------------|--|--|-----------------|
| <p>3.8.12</p> | <p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>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> | <p>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 below:</p> <ul style="list-style-type: none"> - Dispatch of CPO/PK delivery order - Daily Production Report - FFB Despatch Report from supplying estate - Training records - FFB Transaction records <p>ii) Traceability Procedure (Doc. No.: SQD/SMS/1.2, Issue No. 1, Rev. No.: 05 dated 1/8/20, the records retention for all RSPO Supply Chain related records to be retained for a minimum of 5 years' period</p> <p>iii) Records and balance of all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK monitored on a real-time basis on daily/monthly production figure.</p> | <p>Complied</p> |
| <p>3.8.13</p> | <p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p> | <p>Conversion factor of CPO and PK production is depending on the actual OER and KER. Last year's average from October 2020 to September 2021 were 20.92 % (OER) & 5.53 % (KER).</p> | <p>Complied</p> |

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

| | | | |
|---|---|--|----------|
| 3.8.14 | Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate. | The facility is using the actual extraction rate and therefore updating of rates is not necessary. | Complied |
| 3.8.15 | <p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p> | It has been confirmed 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. No incoming of uncertified FFB and mill only process RSPO certified FFB from Kulim (M) Berhad group estates. | 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 IT platform carried out by the mills when RSPO certified products are sold as certified to refineries. Details of transaction summarized under table ###</p> <p>Total of registered transaction from October 2020 to September 2021;</p> <p>CPO: 58,156.87mt</p> <p>PK: 15,360.84mt</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> | Kulim (Malaysia) Berhad has obtained Trademark License from RSPO and seen the trademark license# 1-0080-09-100-00 which valid from 13/8/2021 – 12/8/2023 for IP Model for Tereh Palm Oil Mill. The facility is aware with the requirements of the RSPO Rules on Market Communications and Claims. | Complied |
| General corporate communications | | | |
| 4.1 | A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim. | 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. | Complied |

| | | | |
|--|---|---|----------|
| 4.2 | <p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member’s history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. <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> | <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 |
| 4.3 | <p>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.</p> | <p>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.</p> | Complied |
| 4.4 | <p>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.</p> | <p>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.</p> | Complied |
| 4.5 | <p>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.</p> | <p>There was no RSPO corporate logo has been used verified through website, notice board, business card, shipping documentation and procurement/ purchasing document.</p> | Complied |
| Business to business communications | | | |
| 5.1 | <p>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.</p> | <p>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.</p> | Complied |
| 5.2 | <p>When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the</p> | <p>Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated</p> | Complied |

| | | | |
|---|--|--|----------------|
| | supply chain model and certificate number under which the claim is being made. | that the product is CSPO (Identity Preserved) with RSPO certificate number: RSPO 613086. | |
| 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> | Tereh Palm Oil Mill is not under distributor or wholesaler category. Thus, this requirement is not applicable. | Not Applicable |
| Business to consumer communication | | | |
| 6.1 | Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as ‘product-specific’ claims. Product-specific claims are voluntary. | No business to consumer communication on product specific claim made by Tereh 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 Tereh 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 Tereh Palm Oil Mill and only produce crude and unfinished product. This is not applicable for POM. | Not Applicable |

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

| | | | |
|-----|--|--|----------------|
| 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 Tereh 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 Tereh 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 Tereh 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 Tereh 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 trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rsपो.org . | No business to consumer communication on product specific claim made by Tereh Palm Oil Mill and only produce crude and unfinished product. This is not applicable for POM. | Not Applicable |

| MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES | | | |
|--|--|---|----------|
| Certified oil palm content (IP) | | | |
| | 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 made. | Complied |
| | 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 |
| Labelling and trademark (IP) | | | |
| | <p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • RSPO trademark which includes the tag 'CERTIFIED' or • 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. | 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 |
| Messaging (IP) | | | |
| | <p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org | 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 |

| | | | |
|---|--|--|-----------------|
| | <ul style="list-style-type: none"> • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. | | |
| <p>Principle 4: Respect community and human rights and deliver benefits</p> | | | |
| <p>Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p> | | | |
| <p>4.1.1</p> | <p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p> | <p>Kulim (Malaysia) Berhad has a Sustainability Policy which signed by the new Managing Director on 1st October 2020. The policy which among others, states its 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, whistleblowers, complainants and community spokespersons. This Policy was communicated to all levels of workforce during briefing held at FGV Paloh Estate (17/2/21) and Sg Tawing Estate (21/3/2021).</p> | <p>Complied</p> |
| <p>4.1.2</p> | <p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p> | <p>There is no violence or harassment in the operations. This was assured as there were no reports of any instigation of violence or use of any form of harassments in the certification units. Interview with the workers and staffs also indicated that there was no</p> | <p>Complied</p> |

| | | | |
|--|---|---|----------|
| | | instigation of violence or use of any form of harassments in the operations. | |
| Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties | | | |
| 4.2.1 | <p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p> | Kulim (Malaysia) Berhad has established Grievance Procedure (Doc No: SQD/SMS/4.1 dated 01/08/2020). It aims to ensure that KULIM has a documented system for dealing with complaints and grievances that is agreeable to all sides and accepted by all stakeholders. | Complied |
| 4.2.2 | <p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p> | <p>Briefings on grievance procedures are given to ensure that the system is understood by affected parties. The external stakeholders were briefed on 29th September 2021 during stakeholder meeting via online platform.</p> <p>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. At Sg Tawing Estate, the briefing on grievance procedure was given on 9 July 2021, and at FGV Paloh Estate on 5th April 2021. For Tereh Palm Oil Mill, the latest briefing was carried out on 16/12/2021.</p> | Complied |
| 4.2.3 | <p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p> | 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. This was seen from housing defects report and completion with the acknowledgement by the complainant. | Complied |
| 4.2.4 | <p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to</p> | 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. As for FGV Paloh, | Complied |

| | choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance - | conflict resolution mechanism addressed under Group Sustainability Policy, FGV/SED/POL/001, rev: 5, dated 17/11/2020; clause 5.4.2.4 | | | | | | | | | | | | | | | |
|---|--|--|-----------|-------------|--|--|--|----------------------------|---------------|-----------|-------------|--|--|--|--|--|----------|
| Criterion 4.3: 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 - | Evidence was available that contributions to local development was made based on results of consultation with the respective communities. Among the contributions made were: Tereh Palm Oil Mill: Food basket/ration during Enhanced Movement Control Order (June 2021). RM 200 single/bachelor and for family RM 400 worth of groceries supply. Sg Tawing Estate: COVID19 food ration for home quarantine workers. FGVPM Ladang Paloh: Donation to Kindergarten <i>Istiqamah</i> for school activities. Selai Estate: COVID19 food ration for home quarantine workers. | Complied | | | | | | | | | | | | | | |
| Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent. | | | | | | | | | | | | | | | | | |
| 4.4.1 | (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available. - Critical (Major) compliance - | Copies of land titles were available and verified. Details of the respective land titles to demonstrate the right to use the land as shown below. Quit rents were paid accordingly. There was no evidence of any part of the land overlapping with customary land owners. <table border="1" data-bbox="1137 1157 1928 1364"> <thead> <tr> <th rowspan="2">Estates</th> <th colspan="4">Land title</th> </tr> <tr> <th>HS(D) No./PTD Ref/Lot ref.</th> <th>Land Use Type</th> <th>Size (ha)</th> <th>Expiry date</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table> | Estates | Land title | | | | HS(D) No./PTD Ref/Lot ref. | Land Use Type | Size (ha) | Expiry date | | | | | | Complied |
| Estates | Land title | | | | | | | | | | | | | | | | |
| | HS(D) No./PTD Ref/Lot ref. | Land Use Type | Size (ha) | Expiry date | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | |

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

| | | | | | | |
|--|---|----------------------|---------------------|---|--------|---------------------------------|
| | 1 | Selai/Enggang Estate | GRN5622 32/lot 3892 | Cultivation of oil palm | 356.3 | Freehold |
| | | | GRN5622 33/Lot 2838 | Cultivation of oil palm | 3,179 | Freehold |
| | 2 | FGV Estate Paloh | HSD 42850/lot 2847 | Cultivation of rubber, coconut and oil palm | 335.81 | Lease period ended on 30/5/2098 |
| | | | HSD 42852/lot 2851 | Cultivation of rubber, coconut and oil palm | 235.67 | Lease period ended on 30/5/2098 |
| | | | HSD 42851/lot 2850 | Cultivation of rubber, coconut and oil palm | 215.57 | Lease period ended on 30/5/2098 |
| | | | HSD 42853/lot 2852 | Cultivation of rubber, coconut and oil palm | 281.22 | Lease period ended on 30/5/2098 |

| | | | | | | | | |
|--------|---|--|------------------|--------------------|---|----------|---------------------------------|----------------|
| | | | | HSD 42849/lot 2846 | Cultivation of rubber, coconut and oil palm | 263.53 | Lease period ended on 30/5/2098 | |
| | | 3 | Sg Tawing Estate | HSD 6060, PTD 2137 | Cultivation of Oil Palm | 2,225.77 | Lease period ended on 27/6/2079 | |
| 4.4.2 | Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include: | Based on documents sighted and interviews conducted with stakeholders from nearby villagers, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable. | | | | | | Not Applicable |
| 4.4.2a | Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance - | Based on documents sighted and interviews conducted with stakeholders from nearby villagers, there was no evidence of any dispute with any previous owner or occupants. Therefore, 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 - | Based on documents sighted and interviews conducted with stakeholders from nearby villagers, there was no evidence of any dispute with any previous owner or occupants. Therefore, 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 | Based on documents sighted and interviews conducted with stakeholders from nearby villagers, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable. | | | | | | Not Applicable |

| | | | |
|---|---|--|----------------|
| | status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance - | | |
| 4.4.3 | (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance - | Based on documents sighted and interviews conducted with stakeholders from nearby villagers, there was no evidence of any dispute with any previous owner or occupants. Therefore, 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 - | Based on documents sighted and interviews conducted with stakeholders from nearby villagers, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable. | Not Applicable |
| 4.4.5 | (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance - | Based on documents sighted and interviews conducted with stakeholders from nearby villagers, there was no evidence of any dispute with any previous owner or occupants. Therefore, 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. - Minor compliance - | Based on documents sighted and interviews conducted with stakeholders from nearby villagers, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable. | Not Applicable |
| Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions. | | | |
| 4.5.1 | (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance - | Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable. | Not Applicable |

| | | | |
|-------|---|---|----------------|
| 4.5.2 | <p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p> | <p>Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable.</p> | Not Applicable |
| 4.5.3 | <p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p> | <p>Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable.</p> | Not Applicable |
| 4.5.4 | <p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p> | <p>Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable.</p> | Not Applicable |
| 4.5.5 | <p>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.</p> <p>- Minor compliance -</p> | <p>Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable.</p> | 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 - | Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. 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 - | Based on documents sighted no new lands were acquired for plantations and mills after 15 November 2018 | Complied |
| 4.5.8 | (C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance - | Based on documents sighted and interviews conducted with stakeholders, there was no evidence of new lands acquired in areas inhabited by communities who live in voluntary isolation. | Complied |
| Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. | | | |
| 4.6.1 | (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance - | 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 2007. This procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly. | Complied |
| 4.6.2 | (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - 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 - | Tereh Palm Oil Mill certification unit does not have any arrangements for scheme smallholdings. 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 - | Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable | Not Applicable |
| Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements. | | | |
| 4.7.1 | (C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance - | 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 2007. This procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly. | Complied |
| 4.7.2 | (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - 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, and briefed to stakeholder on 25 October 2020. | Complied |
| 4.7.3 | 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. - Minor compliance - | Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. However, Tereh Palm Oil Mill and its supply base offer job opportunities to local communities living within its vicinity. | Complied |

| | | | |
|--|---|--|----------------|
| Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights. | | | |
| 4.8.1 | 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. - Minor compliance - | Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable | Not Applicable |
| 4.8.2 | (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance - | Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Tereh Palm Oil Mill and its supply base were not newly acquired units. Therefore, this indicator is not applicable. | Not Applicable |
| 4.8.3 | Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance - | Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations. Therefore, this indicator is not applicable. | 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 - | Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Therefore, this indicator is not applicable. | Not Applicable |
| Principle 5: Support smallholder inclusion | | | |
| Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses. | | | |

| | | | |
|-------|---|--|----------------|
| 5.1.1 | Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance - | Tereh Palm Oil Mill is an Identity Preserved Mill as evidenced by Certificate No. RSPO 613086 which is valid from 29 March 2019 to 22 Jan 2024. The Mill processes only FFB from its own estates namely Tereh Selatan Estate, Tereh Utara Estate, Sg Tawing Estate, Sg Sembrong Estate, Mutiara Estate, Selai Estate, Rengam Estate, Enggang Estate and two managed entities, that is, Wawasan Estate, and Felda Paloh. Therefore, this Indicator is not applicable. | Complied |
| 5.1.2 | (C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance - | Not applicable as there is no FFB sourced from smallholders | Not Applicable |
| 5.1.3 | (C) 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 - | Not applicable as there is no FFB sourced from smallholders | Not Applicable |
| 5.1.4 | (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance - | Not applicable as there is no FFB sourced from smallholders | Not Applicable |
| 5.1.5 | Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance - | No independent smallholder crop received at Tereh Palm Oil Mill. Thus, this indicator is not available. | Not Applicable |
| 5.1.6 | (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance - | No independent smallholder crop received at Tereh Palm Oil Mill. Thus, this indicator is not available. | Not Applicable |

| 5.1.7 | <p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p> | <p>Records of weighing equipment stamping was maintained on annual basis at visited operating units even though there is no smallholder within Tereh Palm Oil Mill certification unit. Summary of stamping records as follows:</p> <table border="1" data-bbox="1137 507 1921 890"> <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. 986124/DE2 016240</td> <td>GSE 350, 60,000 kg</td> <td>28/5/2021, J2-ATK 01077</td> <td>Tereh Palm Oil Mill</td> </tr> <tr> <td>Serial no. N90011075 0/DE2-016238</td> <td>Flintec FT-11, 80,000 kg</td> <td>28/5/2021, J2-ATK 01065</td> <td>Tereh Palm Oil Mill</td> </tr> </tbody> </table> | Weighing equipment | Model/capacity | Date of stamping, certificate no. | Operating Unit | Serial no. 986124/DE2 016240 | GSE 350, 60,000 kg | 28/5/2021, J2-ATK 01077 | Tereh Palm Oil Mill | Serial no. N90011075 0/DE2-016238 | Flintec FT-11, 80,000 kg | 28/5/2021, J2-ATK 01065 | Tereh Palm Oil Mill | Complied |
|--|---|---|---------------------|----------------|-----------------------------------|----------------|------------------------------|--------------------|-------------------------|---------------------|-----------------------------------|--------------------------|-------------------------|---------------------|----------|
| Weighing equipment | Model/capacity | Date of stamping, certificate no. | Operating Unit | | | | | | | | | | | | |
| Serial no. 986124/DE2 016240 | GSE 350, 60,000 kg | 28/5/2021, J2-ATK 01077 | Tereh Palm Oil Mill | | | | | | | | | | | | |
| Serial no. N90011075 0/DE2-016238 | Flintec FT-11, 80,000 kg | 28/5/2021, J2-ATK 01065 | Tereh Palm Oil Mill | | | | | | | | | | | | |
| 5.1.8 | <p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.</p> <p>- Minor compliance -</p> | <p>No independent smallholder at Tereh Palm Oil Mill Certification Unit. Thus, this indicator is not available.</p> | Not Applicable | | | | | | | | | | | | |
| 5.1.9 | <p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p> | <p>No independent smallholder at Tereh Palm Oil Mill Certification Unit. Thus, this indicator is not available.</p> | Not Applicable | | | | | | | | | | | | |
| <p>Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p> | | | | | | | | | | | | | | | |
| 5.2.1 | <p>The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their</p> | <p>Not applicable as there is no FFB sourced from smallholders.</p> | Not Applicable | | | | | | | | | | | | |

| | | | |
|---|---|--|----------------|
| | supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance - | | |
| 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 - | Not applicable as there is no FFB sourced from smallholders | Not Applicable |
| 5.2.3 | Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance - | Not applicable as there is no FFB sourced from smallholders | Not Applicable |
| 5.2.4 | (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance - | Not applicable as there is no FFB sourced from smallholders | Not Applicable |
| 5.2.5 | The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance - | Not applicable as there is no FFB sourced from smallholders | Not Applicable |
| Principle 6: Respect workers' rights and conditions | | | |
| Criterion 6.1: Any form of discrimination is prohibited. | | | |
| 6.1.1 | (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance - | The Policies that have been developed by Kulim (Malaysia) Berhad to deal with equal opportunity and non-discrimination are: a. Business Policy b. Core Labour Standard c. People Policy | Complied |

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

| | | | |
|-------|---|---|----------|
| | | 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. | |
| 6.1.2 | <p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p> | Based on interviews held with Malaysian and foreign workers from Indonesia and Bangladesh, Tereh Mill and its supply base have been able to demonstrate that no form of any discrimination occurs. | 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. As for the time being, no new recruitment of foreign worker at Tereh Palm Oil Mill certification unit.</p> <p>For FGV Paloh, verified contract between FGV Holding and PT Agesa Asa Jaya dated 15/7/19. The agreement states among others that cost of workers' transportation to the respective estates/mill will be borne by FGV Holding. No recruitment fees are imposed on any of the foreign workers. No foreign workers recruitment in 2020-2021.</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> | Based on interview held with representatives of Women On Wards (WOW) Committee members at Tereh Palm Oil Mill and estates, pregnancy tests are not conducted on discriminatory manner and health screenings are conducted only when legally mandated (when handling chemicals). However, during audit, there was no women | Complied |

| | | | |
|--|---|--|----------|
| | | employees were handling chemicals. Spraying and fertiliser application jobs were carried out by male workers. | |
| 6.1.5 | <p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p> | <p>In place at the Tereh Palm Oil Mill 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. In 2021 & 2022, committee meetings were held as follows:</p> <p>Tereh Palm Oil Mill: 1st October 2021, 7th January 2022</p> <p>Sg Tawing Estate: 9th February 2021, 25th January 2022.</p> <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. For FGV Paloh estate, gender committee named under KKD @ <i>Kelab Kekeluargaan Dayabudi</i>. Latest meeting was carried out on 6/5/2021. As to date, no harassment (physical/verbal) issue reported.</p> | Complied |
| 6.1.6 | <p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p> | <p>From payslips reviewed, evidence was available that workers receive equal pay for the same work scope. The workers received RM46.15 per day and allowance paid based on MAPA/NUPW circular for Special Gratuitious Payment (SGP), productivity incentive (PI) and price bonus.</p> | Complied |
| <p>Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p> | | | |
| 6.2.1 | <p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> | <p>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</p> | Complied |

| | | | |
|-------|--|--|----------|
| | <p>- Critical (Major) compliance -</p> | <p>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> <p>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.</p> | |
| 6.2.2 | <p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p> | <p>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</p> | Complied |

| | | | |
|--------------|--|---|-----------------|
| | | <p>accordance with the relevant laws (SOCSO, EPF, EIS) and Labour Office permits.</p> <p>None of the sampled workers had any family members performing work.</p> <ul style="list-style-type: none"> • Employment contracts template. • Check-roll records • Employee Master List. | |
| <p>6.2.3</p> | <p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p> | <p>Based on review of punch cards, workers’ employment contracts and payslips, evidence was available that Tereh Palm Oil Mill 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 June 2021 (low crop), March 2021 (normal crop) and Aug 2021 (peak crop).</p> <p><u>Tereh Palm Oil Mill (8 workers sampled from total of 101 workers)</u></p> <p>Workers No. 612321, 612346, 612024, 612306, 612356, 612285, 612342, 612353</p> <p><u>Sq Tawing Estate (9 workers sampled from total of 121 workers)</u></p> <p>Workers No. 683170, 683068, 683161, 683129, 683165, 683016, 683021, 683095, 683186</p> <p><u>FGV Paloh Estate (7 workers sampled from total of 83 workers)</u></p> | <p>Complied</p> |

| | | | |
|--------------|--|---|-----------------|
| | | <p>Workers ID. C5935226, C5624812, N3665064, BP0967432, EE0669596, T9066257, C7527591.</p> <p><u>Enggang Estate (7 workers sampled from total of 84 workers)</u></p> <p>Workers no. 617791, 617801, 617475, 617685, 617492, 617762, 617718</p> <p><u>Selai Estate (8 workers sampled from total of 125 workers)</u></p> <p>Workers no. 616895, 616749, 616788, 616730, 616147, 616882, 616894, 616932</p> | |
| <p>6.2.4</p> | <p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p> | <p>Based on visits made to the Tereh Palm Oil Mill and estate line site, adequate housing, sanitation facilities, water supplies, medical and welfare amenities are being provided to all employees and their family members residing within the premises. Houses have between 2 to 3 bedrooms with between 2 to 3 occupants per house. Electricity and water are available 24 hours a day, and electricity usage of up to 50kW per month is subsidised. Water is provided free of charge. The areas surrounding the housing area are generally clean and well maintained. The houses were generally in good state of repair and grass kept reasonable short. Domestic waste bins are emptied thrice per week. Perimeter drains are clear of any blockages. Budget guidelines 2022 (A/C 762-01 Labour Benefit), effective 1st January an employee for whom no approved accommodation is available shall be entitled to a payment of RM 125 per month. As part of Workers' Minimum Standards of Housing</p> | <p>Complied</p> |

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

| | | | |
|-------|---|---|----------|
| | | <p>and Amenities Act in 1966 programme, the following records were observed:</p> <p><u>Tereh Palm Oil Mill</u> VMO visit: 27/2, 6/2 Line site – 22/2/22, 15/2/22, 9/2/22, 4/2/22</p> <p><u>Sg Tawing Estate</u> VMO visit – 6/2, 27/2 Line site: 3/3/22, 23/2/22, 17/2/22,10/2/22</p> | |
| 6.2.5 | <p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p> | <p>Evidence is available that efforts are made to improve workers' access to adequate, sufficient and affordable food. A canteen is available at the Tereh Palm Oil Mill and is open from 7AM to 7PM serving breakfast, lunch and dinner. At the estates, sundry shop also available. The shop is required to submit the list of items sold to the estate office for price monitoring every 3 months. The latest price monitoring list were checked:</p> <p>Tereh Palm Oil Mill – 7/12/2021 Sg Tawing – 27/12/2021 Enggang – 14/12/21</p> | Complied |
| 6.2.6 | <p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia,</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 RM1,200 per month, or more.</p> <p>Tereh Palm Oil Mill 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> | Complied |

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

| <p>Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage). The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment | <table border="1"> <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>Tereh Palm Oil Mill</td> <td>RM1,140.12</td> <td>RM2,116.94</td> <td>RM3,257.06</td> </tr> <tr> <td>FGV Paloh Estate</td> <td>RM679.33</td> <td>RM1,393.55</td> <td>RM2,072.88</td> </tr> <tr> <td>Sg Tawing Estate</td> <td>RM1,297.91</td> <td>RM1,793.53</td> <td>RM3,091.44</td> </tr> <tr> <td>Enggang Estate</td> <td>RM 800.30</td> <td>RM 1,527.29</td> <td>RM2,327.59</td> </tr> <tr> <td>Selai Estate</td> <td>RM 817.21</td> <td>RM 2,480.58</td> <td>RM3,297.79</td> </tr> </tbody> </table> | Mill/Estate | In-kind benefits | Average take-home pay | Prevailing wage | Tereh Palm Oil Mill | RM1,140.12 | RM2,116.94 | RM3,257.06 | FGV Paloh Estate | RM679.33 | RM1,393.55 | RM2,072.88 | Sg Tawing Estate | RM1,297.91 | RM1,793.53 | RM3,091.44 | Enggang Estate | RM 800.30 | RM 1,527.29 | RM2,327.59 | Selai Estate | RM 817.21 | RM 2,480.58 | RM3,297.79 | <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 | | | | | | | | | | | | | | | | | | | | | | | |
| Tereh Palm Oil Mill | RM1,140.12 | RM2,116.94 | RM3,257.06 | | | | | | | | | | | | | | | | | | | | | | | |
| FGV Paloh Estate | RM679.33 | RM1,393.55 | RM2,072.88 | | | | | | | | | | | | | | | | | | | | | | | |
| Sg Tawing Estate | RM1,297.91 | RM1,793.53 | RM3,091.44 | | | | | | | | | | | | | | | | | | | | | | | |
| Enggang Estate | RM 800.30 | RM 1,527.29 | RM2,327.59 | | | | | | | | | | | | | | | | | | | | | | | |
| Selai Estate | RM 817.21 | RM 2,480.58 | RM3,297.79 | | | | | | | | | | | | | | | | | | | | | | | |

| | | | |
|---|--|--|----------|
| | <ul style="list-style-type: none"> The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p> | | |
| 6.2.7 | <p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p> | <p>Based on documents sighted and interviews conducted with workers and management, Tereh Palm Oil Mill its supply base only employ full-time employees. All employees are employed on either permanent or contractual full-time basis. There is no casual, temporary or day labour employed.</p> | Complied |
| <p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p> | | | |
| 6.3.1 | <p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p> | <p>A published statement on freedom of association is available and displayed at the main notice boards within the Tereh Mill and its supply base. Also sighted were:</p> <ul style="list-style-type: none"> - Paragraph 2 of the Employees’ Guide Book which confirms and respects workers’ rights to join a union recognized by the Kulim (Malaysia) Berhad. - 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>Briefing/Trainings were also held during Policy training held on 11/1/2021 (Sg Tawing Estate)</p> <p>FGV Paloh Estate recognize the established policy on freedom of association based on Group Sustainability Policy, Policy no. FGV/SED/POL/001, rev: 4dated 17/11/2020. The estate has committed to continuously adhere the collective agreement (CA)</p> | Complied |

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

| | | | |
|--|---|--|----------------|
| | | which officiated on 22/1/20 (Cog. No: 025/2020) between FGV Plantations (M) Sdn Bhd and Kesatuan Pekerja-Pekerja FGV Plantations (Malaysia) Sdn Bhd. The CA is valid from 1/1/2019 until 31/12/2021. | |
| 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>In Tereh Palm Oil Mill, NUPW minute of meeting dated 26/06/2021. No complaint raised. Only discussion regarding COVID 19 and operation were raised.</p> <p>In Sg Tawing Estate, sighted the NUPW minute of meeting dated 16/2/2022. The meeting has re-emphasised on company's rules and regulations, workers rights as well as COVID19 precautionary measures in the estate. Based on minute, so pending issue reported.</p> <p>Minute of meeting for <i>Kesatuan Pekerja-Pekerja</i> FGVPM dated 9/12/21 was sighted. Representative from FGVPM Ladang Paloh joined the meeting with other FGVPM's estate representatives. Among issues discussed:</p> <ul style="list-style-type: none"> i) Option for retirement at 55 years old ii) Housing subsidy iii) Approval for new members | Complied |
| 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>New workers representatives were appointed for each nationalities (Bangladesh, Indonesia and India). Based on interview with the workers representatives, they were appointed by management and this was also confirmed by the estate's assistant. No evidence of free elected process for the new foreign workers representative as to date. Thus a minor NC was raised.</p> | Non-compliance |
| <p>Criterion 6.4: Children are not employed or exploited.</p> | | | |

| | | | |
|-------|--|---|----------|
| 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 by Mirzafiz Sdn Bhd, Teo Tuan Kwee Sdn Bhd and Fica Sdn Bhd and harvesting contractor, Lim Son Peng.</p> <p>For example at Sg Tawing Estate, briefing was carried out on 26/1/22 during muster briefing to workers.</p> | Complied |
| 6.4.2 | <p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p> | <p>Documentary evidence is available that minimum age requirements are met. This is based on workers' check roll list and copies of their passport/NRIC details. Based on workers' NRIC and passports, all workers were at least 18 years old when employed.</p> | Complied |
| 6.4.3 | <p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p> | <p>There is no young person employed in Tereh Palm Oil Mill and its supply bases.</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 23rd September 2021. Further, an Addendum to agreements sixed 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</p> | Complied |

| | | | |
|--|---|--|----------|
| | | labour. Interviews held with contractors and suppliers also confirmed their understanding of this obligation. | |
| Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected. | | | |
| 6.5.1 | (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance - | A Policy to prevent sexual and other forms of harassment are available in Sexual Harassment Policy dated 1 May 2018 signed by Executive Director. Interviews held with women employees also confirmed their awareness of this Policy and its implementation. For example, sexual harassment policy briefing was carried out on 30/12/2021 at Tereh Palm Oil Mill and Sg Tawing Estate on 9/1/22. | Complied |
| 6.5.2 | (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance - | 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 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. Briefing on reproductive rights were also given during WoW meetings as follows: Tereh Palm Oil Mill: 1 October 2021 Enggang Estate: 2 February 2021 FGV Paloh Estate: 6 May 2021 Interviews held with women employees also confirmed their awareness of this Policy and its implementation | Complied |
| 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. | For Sg Tawing Estate, new mothers need assessment was carried out during gender committee meeting on 25/1/22. 1 new mother | Complied |

| | | | |
|---|--|--|----------|
| | - Minor compliance - | was identified and based on the assessment, no additional request and assistance from the new mother. | |
| 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. For example, grievance mechanism briefing was carried out on 13/2/2022 at Sg Tawing Estate. | Complied |
| Criterion 6.6: No forms of forced or trafficked labour are used. | | | |
| 6.6.1 | <p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) Charging the workers for recruitment fees. Contract substitution Involuntary overtime Lack of freedom of workers to resign Penalty for termination of employment Debt bondage Withholding of wages <p>- Critical (Major) compliance -</p> | <p>Tereh Palm Oil 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>Passports: 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>As for FGV Paloh, passport locker implementation has been introduced since 06/04/2019. Workers passport are no longer kept in the office for safe keeping. Each worker provided with their own passport locker and given free access to use passport.</p> <p>Recruitment fees:</p> | Complied |

| | | | |
|--|--|---|--|
| | | <p>Reviewed was contract dated 13 February 2020 between Kulim (Malaysia) Berhad and PT Hamparan Karya Insani and PT Wira Karitas for manpower supply from Indonesia. The agreement states among others, that cost of 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. This was further confirmed in interviews held with the workers from Indonesia and Bangladesh.</p> <p>Contract substitution:</p> <p>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 Tereh Palm Oil Mill and its supply base.</p> <p>Involuntary overtime:</p> <p>Based on documents signed by workers on overtime, and based on interviews conducted, there is no evidence of involuntary overtime within the Tereh Mill and its supply base.</p> <p>Lack of freedom of workers to resign & penalty for termination of employment:</p> <p>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>Debt bondage & withholding of wages:</p> | |
|--|--|---|--|

| | | | |
|--|--|---|----------|
| | | Based on payslips sighted and interview with workers, there was no evidence of any debt bondage and withholding of wages. | |
| 6.6.2 | <p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p> | <p>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"> - prohibits the employment of children and young persons, forced and bonded labour - provides for signing of written employment contracts in a language they understand with clear remuneration and description of duties - workers' entitlement to housing and basic amenities which are at par with statutory requirements - free of discrimination, coercion or violence - rights of employees to join trade unions - accessibility to grievance procedure - entitled to one day off per week. <p>Based on pay slips, employment contracts, punch cards reviewed, and interviews conducted with workers, Tereh Palm Oil Mill and its supply base are able to demonstrate the implementation of this Policy.</p> | Complied |
| Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health. | | | |
| 6.7.1 | <p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p> | <p>Kulim Plantation has appointed the senior most person (that is, Senior Manager / Manager) at each Operating Unit as Chairman of Occupational Safety and Health Committee (OSHC) as per appointment letter no. SQD/ADMIN/020/21 dated 15/09/2021 signed by the Chairman, ESG Committee (OSH). Additionally, Assistant Manager, the OSHC and Emergency Response Team members are also charged with responsibility on H&S matters.</p> | Complied |

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

Their appointment letter were also randomly verified available and current.

For FGV Paloh Estate, the Estate Manager has been appointed as person responsible cum Chairman of Safety and Health Committee as per appointment letter no. 47/9520/HSE/FGVPM/WM/2020 dated 01/06/2020 signed by the General Manager, Mersing Region.

OSH Committee at the each Operating Unit meet quarterly to discuss concerns of all parties (own workers, contractors, authorities) about health, safety and welfare as required by law. Sighted the Minutes of Meeting that include discussions on matters arising from the previous meetings, accident and incident report, workplace inspection, and training. The following table shows their meeting dates held:

| Quarter | 1/2021 | 2/2021 | 3/2021 | 4/2021 |
|---------------------|---------------|---------------|---------------|---------------|
| Tereh Palm Oil Mill | 06/03/2021 | 14/07/2021 | 17/09/2021 | 15/12/2021 |
| Sg. Tawing Estate | 16/12/2020 | 04/03/2021 | 27/07/2021 | 20/09/2021 |
| Enggang Estate | 18/12/2020 | 18/03/2021 | 17/06/2021 | 09/09/2021 |
| FGV Paloh Estate | 07/12/2020 | 25/03/2021 | 30/06/2021 | 20/09/2021 |

| | | | |
|--------------|--|--|-----------------|
| <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>Kulim Plantations has established emergency response procedure available both in English language and Bahasa Malaysia as guidance for the operating units to act should any emergency occurs. Among the foreseeable emergency scenarios identified were Fire, Accident, Flood and Evacuation. The procedures were seen displayed on noticeboard at strategic location at the mill and estates.</p> <p>FGV Paloh Estates follows the FGV Plantation emergency procedures documented in its Emergency Preparedness and Response, QOSHE Manual document no. FPI/L2/QOSHE-14.0. In its procedure credible emergency events recognized were fire, minor and major accident and chemical spillage.</p> <p>These operating units continuously provide training to ensure their employees' awareness, preparedness and readiness to response to any of the identified scenarios should it occur. Latest training was conducted as follows:</p> <ol style="list-style-type: none"> 1. Effluent Pond Bund rupture and oil spillage training at Tereh Palm Oil Mill dated 09/02/2021. 2. Office building evacuation and fire drill at Sg. Tawing Estate dated 05/02/2021. 3. Fire drill/firefighting training for FGV Paloh Estate dated 22/04/2021. <p>The operating units maintain the records of accidents including JKKP forms 6, 7 & 8 reported to DOSH, medical leaves certificates, accident investigation reports and HIRARC review. The accident occurrences were also reported to Kulim Headquarters on monthly basis and to DOSH via digital submission of the JKKP 6 form through MyKKP system. Reviewed the accident investigation and JKKP 6 submission as follows:</p> | <p>Complied</p> |
|--------------|--|--|-----------------|

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

| | | | |
|-------|---|--|----------------|
| | | <ol style="list-style-type: none"> 1. Tereh Palm Oil Mill - JKPP 7 form for audiometric test results conducted on 21/03/2021 and submission to DOSH on 14/06/2021 as per letter, ref. no. LTM/C9/06/2021. 2. Enggang Estate – JKPP 6 form for accident occurred on 10/03/2021 and submission to DOSH on 14/03/2021. 3. FGV Paloh Estate - JKPP 6 form and accident investigation report for accident occurred on 16/06/2021 and submission to DOSH on 17/06/2021. <p>For annual accident statistic, sighted the JKPP 8 form for preceding year was submitted by the respective Operating Unit to DOSH timely.</p> <p>The mill and estates provide first aid kit/box. Its content and expiry date of medicine are monitored monthly and where appropriate replenished by the Estate Hospital Assistant or Medical Assistant. They are located at strategic location at the office, workshop or assigned to trained first aider (Mandore) in the field. Each operating unit has also established information on the location of first aid box, name of PIC and telephone number. This information is communicated through briefing, training and displayed on notice board.</p> | |
| 6.7.3 | <p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p> | <p>The assessed estates and mill continued to provide their employees with PPE free of charge.</p> <p>Appropriate type of PPE is given to protect workers at the mill and estates from risk of exposure to potentially hazardous substance(s) or harm arising from work activity at the workplace. The relevant PPE given is based on control measures recommended by the CHRA Assessor and/or those documented in the HIRARC Register.</p> | Non-compliance |

| | | | |
|--|--|---|--|
| | | <p>Following are examples of PPE given to workers by occupation.</p> <ul style="list-style-type: none"> i) FFB Graders – Safety Shoes, Safety Glass, Safety Vest, Safety Helmet And Cotton Gloves. ii) Mill Sterilizer, Press, Kernel Plant Operator – Safety Helmet, Safety Glass, Cotton Gloves, Safety Shoes, and Ear plug. iii) Mill Boiler Operator – Safety Helmet, Safety Glass, Leather Hand Glove, Apron, N95 Mask, Safety Shoes, Safety Vest and Ear Muff. iv) Mill Power House Operator – Safety Helmet, Safety Glass, Leather Hand Glove, Cotton Gloves, Safety Shoes, Safety Vest and Ear Muff. v) Mill Lab Operator – Respirator R95 (double cartridge), Nitrile Glove (chemical resistant), Safety Boots, Ear plug. vi) Water Treatment Plant Operator - Safety Boots, Ear Muff, Safety Vest, Safety Helmet, Cotton Glove, Dust Mask vii) Shovel driver - Safety Helmet, Safety Shoes, Safety Glass, Cotton Gloves. viii) Workshop – Leather Glove, Respirator, Welding Helmet or Face Shield Fitted with Proper Filter Shade (For Welding/Oxycutting), Ear Plug, Cotton Glove for Non-Hot Work, Safety Shoes, Helmet, Safety Glass. ix) Estate worker, Sprayers - 3M 3200 Half Face Respirator with 3311K-5 organic vapor filter element (R95), Nitrile Rubber Glove, Cotton Gloves, Antimist Goggles, Wellington Boots and Apron. x) Estate worker, Manurer – Cotton Glove, Nitrile Rubber Gloves, Respirator Mask (N95), Safety Goggles, Wellington Boots and Apron. xi) Estate worker, Harvester – Safety Helmet, Hand Gloves, Safety Goggles, Wellington Boots and Sickle Cover. xii) Loose Fruit Collector - Safety Helmet, Cotton Gloves, | |
|--|--|---|--|

| | | | |
|--|--|---|--|
| | | <p>Wellington Boots, xiii) Tractor / Badang driver – Safety Helmet, Safety Shoes, Safety Glass, Cotton Gloves</p> <p>For non-routine activity such as Work at Height and in Confined Space special PPE are provided. In addition to standard PPE set (Safety Helmet, Safety Shoes, Safety Glass, Cotton Gloves) (a) for Working at Height Body Harness is given, and (b) for Confined Space Entry Safety Line, Gas Detector, Breathing Apparatus are included.</p> <p>Records of PPE issuance are maintained in worker’s individual file.</p> <p>During field and mill visit workers were observed to don the PPE correctly as well as reasonably maintained them.</p> <p><u>Changing room and Shower room</u></p> <p>Sanitation facilities for estate workers applying pesticides are available, so that workers can change out of PPE, wash and put on their personal street clothing. Likewise, clothing lockers are provided for mill workers to change their street clothing to work clothing (PPE) and vice versa at the end of their work shift.</p> <p>Tereh POM</p> <p>Sighted during site visit at Boiler area, found the Fireman not wearing the appropriate PPE provided. This shows that appropriate PPE provided was not worn by the worker at the place of work to cover all potentially hazardous operation. Thus the non-conformity was raised.</p> | |
|--|--|---|--|

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

| <p>6.7.4</p> | <p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p> | <p>All Kulim (M) Berhad mills and estates use SOCSO for local and foreign workers medical care and workplace accident coverage. Sampled the SOCSO contribution as follows:</p> <table border="1" data-bbox="1137 515 1921 938"> <thead> <tr> <th rowspan="2">Operating Unit</th> <th colspan="3">SOCSO Ref no.</th> </tr> <tr> <th>November 2021</th> <th>December 2021</th> <th>January 2022</th> </tr> </thead> <tbody> <tr> <td>Tereh Palm Oil Mill</td> <td>202112070112 317705</td> <td>202201070115 554681</td> <td>202202090118 796240</td> </tr> <tr> <td>Sg. Tawing Estate</td> <td>202100052617 88</td> <td>202200001858 38</td> <td>202200001740 1</td> </tr> <tr> <td>Ladang FGV Paloh</td> <td>ACR122210031 952</td> <td>ACR 012220049433</td> <td>ACR022220004 633</td> </tr> <tr> <td>Enggang Estate</td> <td>202112080112 398939</td> <td>202201070115 564258</td> <td>202202090118 844120</td> </tr> </tbody> </table> | Operating Unit | SOCSO Ref no. | | | November 2021 | December 2021 | January 2022 | Tereh Palm Oil Mill | 202112070112 317705 | 202201070115 554681 | 202202090118 796240 | Sg. Tawing Estate | 202100052617 88 | 202200001858 38 | 202200001740 1 | Ladang FGV Paloh | ACR122210031 952 | ACR 012220049433 | ACR022220004 633 | Enggang Estate | 202112080112 398939 | 202201070115 564258 | 202202090118 844120 | <p>Complied</p> |
|---------------------|--|---|------------------------|----------------|-----|---------------------|---------------|---------------|-----------------|---------------------|------------------------|------------------------|------------------------|-------------------|--------------------|--------------------|-------------------|------------------|---------------------|---------------------|---------------------|----------------|------------------------|------------------------|------------------------|-----------------|
| Operating Unit | SOCSO Ref no. | | | | | | | | | | | | | | | | | | | | | | | | | |
| | November 2021 | December 2021 | January 2022 | | | | | | | | | | | | | | | | | | | | | | | |
| Tereh Palm Oil Mill | 202112070112 317705 | 202201070115 554681 | 202202090118 796240 | | | | | | | | | | | | | | | | | | | | | | | |
| Sg. Tawing Estate | 202100052617 88 | 202200001858 38 | 202200001740 1 | | | | | | | | | | | | | | | | | | | | | | | |
| Ladang FGV Paloh | ACR122210031 952 | ACR 012220049433 | ACR022220004 633 | | | | | | | | | | | | | | | | | | | | | | | |
| Enggang Estate | 202112080112 398939 | 202201070115 564258 | 202202090118 844120 | | | | | | | | | | | | | | | | | | | | | | | |
| <p>6.7.5</p> | <p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p> | <p>HMM</p> <p>Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated. JKPP 8 form were submitted to DOSH through MyKKP systems. Sighted the samples of accident statistic FY 2021 as reported to DOSH as follows:</p> <table border="1" data-bbox="1137 1265 1877 1391"> <thead> <tr> <th>Operating units</th> <th>Accident Cases</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>Tereh Palm Oil Mill</td> <td>2</td> <td>61</td> </tr> </tbody> </table> | Operating units | Accident Cases | LTA | Tereh Palm Oil Mill | 2 | 61 | <p>Complied</p> | | | | | | | | | | | | | | | | | |
| Operating units | Accident Cases | LTA | | | | | | | | | | | | | | | | | | | | | | | | |
| Tereh Palm Oil Mill | 2 | 61 | | | | | | | | | | | | | | | | | | | | | | | | |

| | | | | | | | | | | | | |
|---|--|--|-------------------|----|----|------------------|---|----|----------------|---|----|--|
| | | <table border="1"> <tr> <td>Sg. Tawing Estate</td> <td>10</td> <td>15</td> </tr> <tr> <td>FGV Paloh Estate</td> <td>2</td> <td>36</td> </tr> <tr> <td>Enggang Estate</td> <td>4</td> <td>77</td> </tr> </table> | Sg. Tawing Estate | 10 | 15 | FGV Paloh Estate | 2 | 36 | Enggang Estate | 4 | 77 | |
| Sg. Tawing Estate | 10 | 15 | | | | | | | | | | |
| FGV Paloh Estate | 2 | 36 | | | | | | | | | | |
| Enggang Estate | 4 | 77 | | | | | | | | | | |
| Principle 7: Protect, conserve and enhance ecosystems and the environment | | | | | | | | | | | | |
| Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques. | | | | | | | | | | | | |
| 7.1.1 | <p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p> | <p>The estates has established Integrated Pest Management focusing on controlling the pest infestation such as rat and bagworm. Among the plan established as follows:</p> <ol style="list-style-type: none"> 1. Rat damage census 2. Rat baiting program 3. Barn owl census 4. Maintenance of barn owl box 5. Beneficial plant planting program <p>Reviewed the implementation of the management plan as follows:</p> <p>Sg. Tawing Estate</p> <ol style="list-style-type: none"> 1. The estate currently have placed 92 new barn owl box to reduce the ratio of box per ha. Current ratio was recorded at 1:25 ha. | Complied | | | | | | | | | |

| | | | |
|--|--|--|--|
| | | <ul style="list-style-type: none"> 2. Latest barn owl census was conducted in September 2021 with occupancy rate recorded at 43%. 3. Latest rat baiting was conducted in February to May 2021 with average rounds recorded at 3 – 5 rounds per campaign. <p>Enggang Estate</p> <ul style="list-style-type: none"> 1. The estate conducted bagworm census prior to conduct bagworm treatment. Reviewed the bagworm census and treatment records as at September 2021 2. The estate has established work program for beneficial Plant planting. Reviewed planting records FY 2021 with 31 plots at Selai Div. and 108 plots at Enggang Div. of beneficial plant planted during the period. 3. Latest barn owl census was conducted in September 2021 with occupancy rates recorded at 75% for Enggang Estate and 93% at Enggang Div. <p>FGV Paloh Estate</p> <ul style="list-style-type: none"> 1. The estate conducted bagworm census prior to conduct bagworm treatment. Reviewed the bagworm census records dated 30/03/2021. 2. The estate conducted rat damage census prior to conduct rat baiting campaign. Reviewed the census records dated 27/07/2021 3. The estate has established work program for beneficial Plant planting. Reviewed planting records FY 2021 with 188 plots of beneficial plant planted during the period. | |
|--|--|--|--|

| | | | |
|---|---|--|----------|
| 7.1.2 | 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. - Minor compliance - | There were no species referenced in the Global invasive Species database and CABI.org sighted within the estate and POM premises. | Complied |
| 7.1.3 | 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. - Minor compliance - | No evidence of fire use to control pest in the estate. | Complied |
| Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment. | | | |
| 7.2.1 | (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance - | <p>The justification for chemical usage at the assessed estates continued to be guided by Kulim Agricultural Reference Manual (ARM) Section H01, SOP and in the Pictorial Safety Standard Book. In here too there are other written justifications provided for various fields operations.</p> <p>The Manual has included chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease. The list includes chemical such as Glyphosate, 2-4D methyl amine, Metsulfuron methyl, Triclopyr butoxy ethyl, Glufosinate, etc.</p> <p>Verified during visit to chemical store that Kulim (M) Berhad estates observed and complied not to use Pesticides that are categorised by World Health Organisation as Class 1A or 1B, or that listed by the Stockholm or Rotterdam Conventions, including paraquat. No illegal agrochemicals (stated by local and international laws) was seen used in the two estates. In essence, the pesticides used were those officially registered and approved under the Pesticide Act 1974 and are confined to only class II, class III & class IV only.</p> | Complied |

| | | <p>It is noted that purchase of pesticides is controlled and note made by each individual estate. Rather the purchases are arranged centrally through Head Office.</p> | | | | | | | | | | | | | | | | | | | | | | |
|--|---|--|--------------------|------------------|----------------|--|----------|------|--|----------|---------|--|----------|------|---|----------|---------|--------------------|------------------|-----------------|--|----------|--------|-----------------|
| <p>7.2.2</p> | <p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided. - Critical (Major) compliance -</p> | <p>Records of pesticides used (including active ingredients used and area treated, amount of active ingredients applied per ha and number of applications) were established, monitored and recorded in bin cards, program sheets, chemical register, field- cost books and in progress reports by the two estates. Instructions and precautionary measures stated in the Safety Data Sheet produced by the manufacturer were strictly followed.</p> <p>The table below shows records of weedicide /pesticide use in year 2021.</p> <p>Sg. Tawing Estate</p> <table border="1" data-bbox="1137 900 1928 1169"> <thead> <tr> <th>Active ingredients</th> <th>Area sprayed, ha</th> <th>a.i/ha (lt/ha)</th> </tr> </thead> <tbody> <tr> <td>Glyphosate Isoprpylamine 41% (LD₅₀ rat 5000 mg/kg)</td> <td>2,083.02</td> <td>0.46</td> </tr> <tr> <td>Triclopyr Butoxy Ethyl Esther 32.1% (LD₅₀ rat 692 mg/kg)</td> <td>2,083.02</td> <td>0.31992</td> </tr> <tr> <td>Metsulfuron methyl 20% (LD₅₀ rat 5000 mg/kg)</td> <td>2,083.02</td> <td>0.02</td> </tr> <tr> <td>Imidacloprid 42% (LD₅₀ rat 450 mg/kg)</td> <td>2,083.02</td> <td>0.02782</td> </tr> </tbody> </table> <p>Selai Estate</p> <table border="1" data-bbox="1137 1235 1928 1345"> <thead> <tr> <th>Active ingredients</th> <th>Area sprayed, ha</th> <th>a.i/ha (lit/ha)</th> </tr> </thead> <tbody> <tr> <td>Glyphosate Isoprpylamine 41% (LD₅₀ rat 5000 mg/kg)</td> <td>3,278.38</td> <td>0.3538</td> </tr> </tbody> </table> | Active ingredients | Area sprayed, ha | a.i/ha (lt/ha) | Glyphosate Isoprpylamine 41% (LD ₅₀ rat 5000 mg/kg) | 2,083.02 | 0.46 | Triclopyr Butoxy Ethyl Esther 32.1% (LD ₅₀ rat 692 mg/kg) | 2,083.02 | 0.31992 | Metsulfuron methyl 20% (LD ₅₀ rat 5000 mg/kg) | 2,083.02 | 0.02 | Imidacloprid 42% (LD ₅₀ rat 450 mg/kg) | 2,083.02 | 0.02782 | Active ingredients | Area sprayed, ha | a.i/ha (lit/ha) | Glyphosate Isoprpylamine 41% (LD ₅₀ rat 5000 mg/kg) | 3,278.38 | 0.3538 | <p>Complied</p> |
| Active ingredients | Area sprayed, ha | a.i/ha (lt/ha) | | | | | | | | | | | | | | | | | | | | | | |
| Glyphosate Isoprpylamine 41% (LD ₅₀ rat 5000 mg/kg) | 2,083.02 | 0.46 | | | | | | | | | | | | | | | | | | | | | | |
| Triclopyr Butoxy Ethyl Esther 32.1% (LD ₅₀ rat 692 mg/kg) | 2,083.02 | 0.31992 | | | | | | | | | | | | | | | | | | | | | | |
| Metsulfuron methyl 20% (LD ₅₀ rat 5000 mg/kg) | 2,083.02 | 0.02 | | | | | | | | | | | | | | | | | | | | | | |
| Imidacloprid 42% (LD ₅₀ rat 450 mg/kg) | 2,083.02 | 0.02782 | | | | | | | | | | | | | | | | | | | | | | |
| Active ingredients | Area sprayed, ha | a.i/ha (lit/ha) | | | | | | | | | | | | | | | | | | | | | | |
| Glyphosate Isoprpylamine 41% (LD ₅₀ rat 5000 mg/kg) | 3,278.38 | 0.3538 | | | | | | | | | | | | | | | | | | | | | | |

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

| | | <table border="1"> <tr> <td>Triclopyr Butoxy Ethyl Esther 32.1% (LD₅₀ rat 692 mg/kg)</td> <td>3,278.38</td> <td>0.2264</td> </tr> <tr> <td>2,4 D Amine, 60% (LD₅₀ rat 300 mg/kg)</td> <td>3,278.38</td> <td>0.02</td> </tr> <tr> <td>Flocoumafen 0.005% (LD₅₀ rat 5000 mg/kg)</td> <td>3,278.38</td> <td>1E-05</td> </tr> <tr> <td>Metsulfuron methyl 20% (LD₅₀ rat 5000 mg/kg)</td> <td>3,278.38</td> <td>0.0136</td> </tr> </table> <p>FGVPM Paloh</p> <table border="1"> <thead> <tr> <th>Active ingredients</th> <th>Area sprayed, ha</th> <th>a.i/ha (lit/ha)</th> </tr> </thead> <tbody> <tr> <td>Glyphosate Isopropylamine 41% (LD₅₀ rat 5000 mg/kg)</td> <td>7405.86</td> <td>0.133</td> </tr> <tr> <td>Triclopyr Butoxy Ethyl Esther 32.1% (LD₅₀ rat 692 mg/kg)</td> <td>4,937.24</td> <td>0.090</td> </tr> <tr> <td>Chlorpyrifos (LD₅₀ rat 300 mg/kg)</td> <td>277.98</td> <td>0.020</td> </tr> <tr> <td>Metsulfuron methyl 20% (LD₅₀ rat 5000 mg/kg)</td> <td>7405.86</td> <td>0.000</td> </tr> </tbody> </table> | Triclopyr Butoxy Ethyl Esther 32.1% (LD ₅₀ rat 692 mg/kg) | 3,278.38 | 0.2264 | 2,4 D Amine, 60% (LD ₅₀ rat 300 mg/kg) | 3,278.38 | 0.02 | Flocoumafen 0.005% (LD ₅₀ rat 5000 mg/kg) | 3,278.38 | 1E-05 | Metsulfuron methyl 20% (LD ₅₀ rat 5000 mg/kg) | 3,278.38 | 0.0136 | Active ingredients | Area sprayed, ha | a.i/ha (lit/ha) | Glyphosate Isopropylamine 41% (LD ₅₀ rat 5000 mg/kg) | 7405.86 | 0.133 | Triclopyr Butoxy Ethyl Esther 32.1% (LD ₅₀ rat 692 mg/kg) | 4,937.24 | 0.090 | Chlorpyrifos (LD ₅₀ rat 300 mg/kg) | 277.98 | 0.020 | Metsulfuron methyl 20% (LD ₅₀ rat 5000 mg/kg) | 7405.86 | 0.000 | |
|--|---|---|--|----------|--------|---|----------|------|--|----------|-------|--|----------|--------|--------------------|------------------|-----------------|---|---------|-------|--|----------|-------|---|--------|-------|--|---------|-------|--|
| Triclopyr Butoxy Ethyl Esther 32.1% (LD ₅₀ rat 692 mg/kg) | 3,278.38 | 0.2264 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2,4 D Amine, 60% (LD ₅₀ rat 300 mg/kg) | 3,278.38 | 0.02 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Flocoumafen 0.005% (LD ₅₀ rat 5000 mg/kg) | 3,278.38 | 1E-05 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Metsulfuron methyl 20% (LD ₅₀ rat 5000 mg/kg) | 3,278.38 | 0.0136 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Active ingredients | Area sprayed, ha | a.i/ha (lit/ha) | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Glyphosate Isopropylamine 41% (LD ₅₀ rat 5000 mg/kg) | 7405.86 | 0.133 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Triclopyr Butoxy Ethyl Esther 32.1% (LD ₅₀ rat 692 mg/kg) | 4,937.24 | 0.090 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Chlorpyrifos (LD ₅₀ rat 300 mg/kg) | 277.98 | 0.020 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Metsulfuron methyl 20% (LD ₅₀ rat 5000 mg/kg) | 7405.86 | 0.000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7.2.3 | <p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p> | <p>The management encourage establishing biological control as per IPM plan. The implementation in the field is consistent with the Kulim (M) Berhad Group SOP. The three estates visited were committed to minimize the usage of agrochemicals by implementing growing of beneficial plants.</p> <p>Sighted during field visits the planting of Tunera subulata, Cassia cobanensis and Antigonon leptopus along the major roads as per the guidelines stated in ARM section J10.</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>Blanket spraying was not practiced by this CU and soft grasses were seen maintained in the field. It had also been the practice that</p> | Complied | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | | |
|--------------|--|---|-----------------|
| | <p>- Minor compliance -</p> | <p>insecticides are used only after a threshold level has been exceeded as per the Agricultural Reference Manual (ARM) Section J51- Intergrated Pest Management.</p> <p>There was no prophylactic use of pesticides found at estates visited. The quantity of agrochemicals required for various field conditions are documented and justified in KMB Agriculture Reference Manual Section H01.</p> | |
| <p>7.2.5</p> | <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"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p> | <p>The estates confined use of pesticides that were purchased and controlled centrally by HQ office. Kulim Malaysia Berhad (KMB) only purchased chemicals that are registered under the Malaysian Pesticides Act 1974 (Act 149) and its Regulations.</p> <ol style="list-style-type: none"> 1. The review of the chemical register concluded that all pesticides used were of class II, III & class IV. The use of paraquat had been prohibited in all KMB estates. In its place, alternatives such as Glyphosate were used instead. 2. Inspection of the Chemical Store showed that only class, III & IV chemicals were used. There were no Class 1A and Class1B agrochemicals used. 3. Group Sustainability Policy dated 17.11.2020 include the following statement: FGV Group shall not use any hazardous chemicals or any agrochemical that are categorized as WHO Class 1A and 1B or that are listed by the Stockholm or Rotterdam Conventions and paraquat except in specific situations. 4. There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that were | <p>Complied</p> |

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

| | | | |
|-------|--|---|----------|
| | | listed by the Stockholm or Rotterdam Conventions been used by KMB and FGV Paloh. | |
| 7.2.6 | <p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p> | <p>Records showed that pesticides were handled, used and applied by trained persons and as per the SDS of the product. Verified:</p> <ul style="list-style-type: none"> a) The staff and workers such as Storekeepers, Sprayers, Fertilizer Applicators and Rat Bait Workers were trained and interviews showed they understood the hazards involved and how the chemicals should be handled in a safe manner. b) The trade and generic names of the chemicals were made known to the workers through the SDS training. SDS was also displayed at all storage areas as observed during the audit. c) The training included the safety aspects and usage of PPE when handling with pesticides. Records of training are shown in 3.7.2 and verified. d) All workers involved in pesticide application were provided with appropriate PPE per the recommendation by the CHRA Assessor and replaced when worn-out. PPE issuance & replacement records were verified by the auditors. e) From interviews conducted with workers and staff in the field and store clerks it was established that they had been trained and were aware of safe handling procedure. f) Job Knowledge in respect of activity for each pesticides handler are periodically refreshed and updated. | Complied |
| 7.2.7 | <p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p> | <p>The storage of pesticides at the visited estates were in accordance with the Occupational Safety and Health Act 1994 (Act 514) and its Regulations and Pesticides Act 1974 (Act 149) and its Regulations. All information regarding the chemicals affixed as product label and the accompanying Safety Data Sheet (see OSH</p> | Complied |

| | | | |
|-------|---|--|----------|
| | | <p>CLASS 2013 Regulations) with details of its usage, hazards, trade and generic names were found available in both English language and Bahasa Malaysia language. Pesticides Sprayers interviewed understood the hazards and risks these chemical posed to them and were carefully explained to them by Assistant Manager and Field Conductor. Hence, they don PPE provided by the estates to minimize and protect from being exposed to these pesticides chemical they handled even though it has been diluted.</p> <p>At audited estates, inspection of their chemical stores s noted that they all comply with the relevant act as well as best practice.</p> <ul style="list-style-type: none"> a) All stores were secured under lock and key with restricted access. b) Only authorized personnel are assigned to handle the chemicals. c) Provision of ventilation fan. d) Display of Safety Pictorial poster, namely the required PPE and chemical Safety hazards pictogram. e) Pesticides were separated by class. f) Store keeper was trained in the handling of all pesticides. g) SDS leaflets were available at all pesticide stores. h) Records of purchase, storage and use were maintained. i) Daily balance of remaining solution after completing pre-mixing were recorded and kept in the store under lock and key. j) Concrete cemented floor, bund wall and provision of sump pond. | |
| 7.2.8 | <p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p> | <p>Sg. Tawing Estate</p> <ol style="list-style-type: none"> 1. Empty chemical containers were triple rinse, reused back as pre-mixing chemical containers or punctured and stored at designated store. Reviewed the inventory records for chemical | Complied |

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

| | | | |
|-------|--|--|----------|
| | | <p>containers for Blocus, Glyphosate, Storm and Foxil for the month of December 2021, January and February 2022.</p> <p>2. The estate disposed the empty pesticides as scheduled waste through licensed operator, Kualiti Alam Sdn. Bhd. Reviewed the disposal records as follows dated 25/01/2022 for SW 409 as per Consignment Note no. 2022012516HZUQKL</p> <p>Selai Estate and Enggang Div.</p> <p>3. Empty chemical containers were triple rinse, reused back as pre-mixing chemical containers or punctured and stored at designated store.</p> <p>4. The estate disposed the empty pesticides as scheduled waste through licensed operator, Kualiti Alam Sdn. Bhd. Reviewed the disposal records as follows dated 19/12/2021 for SW 409 as per Consignment Note no. 20211219144EMO93</p> <p>FGV Paloh Estate</p> <p>5. The estate monitor the inventory of empty chemical containers generated and recorded in "Binkad Tong Kosong & Bilasan 3 Kali". Reviewed records for Triclopyr, Nurelle, Sodium, Decis Deltamethrin, Cypermethrin and miracle for the month of November 2021, December 2021 and January 2022.</p> <p>6. The estate disposed the empty containers at centralised collection centre at FGV Maokil Estate 6. Reviewed the latest disposal records dated 21/01/2021 and 17/02/2022. The collection centre has submitted a copy of disposal records to the estate. Reviewed the consignment note no. 0163602 dated 28/10/2021.</p> | |
| 7.2.9 | (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This | No evidence of aerial spraying in the estates. | Complied |

| | <p>requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p> | | | | | | | | | | | | | | | | |
|---------------|---|--|-----------------|---------------------|------------------|---------|-------|-----------|--|-----------------|---------|-----------|---|------------|-----------|---|-----------------|
| <p>7.2.10</p> | <p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p> | <p>Annual medical surveillance by Occupational Health Doctor was conducted as evidenced in the sighted records at the following estates:</p> <table border="1" data-bbox="1144 624 1921 951"> <thead> <tr> <th>Estate</th> <th>Date of examination</th> <th>No. of employees</th> <th>Results</th> </tr> </thead> <tbody> <tr> <td>Selai</td> <td>1.11.2021</td> <td>21 (13 Sprayers, 7 Manurer, 1 Storekeeper)</td> <td rowspan="3">All Fit To Work</td> </tr> <tr> <td>Enggang</td> <td>1.11.2021</td> <td>24 (12 Sprayers, 11 Manurer, 1 Storekeeper)</td> </tr> <tr> <td>Sg. Tawing</td> <td>3.11.2021</td> <td>34 (19 Sprayers, 14 Manurer, 1 Storekeeper)</td> </tr> </tbody> </table> <p>Pesticides operators, Storekeeper and Fertilizer Applicators were given training on the correct use and maintenance of Personal Protective Equipment' as well as safe handling and application of the pesticides. All precautions attached to the products were explained and found understood by them. Reviewed the training records as per criteria 3.7.2.</p> | Estate | Date of examination | No. of employees | Results | Selai | 1.11.2021 | 21 (13 Sprayers, 7 Manurer, 1 Storekeeper) | All Fit To Work | Enggang | 1.11.2021 | 24 (12 Sprayers, 11 Manurer, 1 Storekeeper) | Sg. Tawing | 3.11.2021 | 34 (19 Sprayers, 14 Manurer, 1 Storekeeper) | <p>Complied</p> |
| Estate | Date of examination | No. of employees | Results | | | | | | | | | | | | | | |
| Selai | 1.11.2021 | 21 (13 Sprayers, 7 Manurer, 1 Storekeeper) | All Fit To Work | | | | | | | | | | | | | | |
| Enggang | 1.11.2021 | 24 (12 Sprayers, 11 Manurer, 1 Storekeeper) | | | | | | | | | | | | | | | |
| Sg. Tawing | 3.11.2021 | 34 (19 Sprayers, 14 Manurer, 1 Storekeeper) | | | | | | | | | | | | | | | |
| <p>7.2.11</p> | <p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p> | <p>All estates and mill in the CU continued to comply with the established procedure and guidelines stated in the Standard Operating Procedure, KMB Agrochemical Management ref SQD/SMS/6.1dated 01/8/2020. Verified through interview and record sighting.</p> <p>Found that the estates maintained the list of sprayers. No female Pesticides sprayers nor lady under age of 18 as verified in</p> | <p>Complied</p> | | | | | | | | | | | | | | |

| | | Employee Register were employed at Enggang Estate, Sg. Tawing Estate and FGV Felda Paloh Estate. | | | | | | | | | | | |
|---|--|---|------------|--------|-----------------------------------|--|-----------------------------------|---------------------------------------|----------|--------------------|--------------------|---|----------|
| Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner. | | | | | | | | | | | | | |
| 7.3.1 | A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented. - Minor compliance - | <p>The operating units has identified the waste products and source pollution and documented in Waste Management Plan. The plan was reviewed on annually basis. The waste has been identified as follows:</p> <p>Scheduled Waste</p> <table border="1"> <thead> <tr> <th>Waste type</th> <th>Source</th> </tr> </thead> <tbody> <tr> <td>Empty chemical containers (SW409)</td> <td rowspan="2">Process of chemical application at lab and water treatment plant</td> </tr> <tr> <td>Empty chemical packaging (SW 409)</td> </tr> <tr> <td>Empty hydrocarbon containers (SW 409)</td> <td rowspan="4">Workshop</td> </tr> <tr> <td>Batteries (SW 102)</td> </tr> <tr> <td>Spent oil (SW 305)</td> </tr> <tr> <td>Hydrocarbon / pesticide spillage (SW 408)</td> </tr> </tbody> </table> | Waste type | Source | Empty chemical containers (SW409) | Process of chemical application at lab and water treatment plant | Empty chemical packaging (SW 409) | Empty hydrocarbon containers (SW 409) | Workshop | Batteries (SW 102) | Spent oil (SW 305) | Hydrocarbon / pesticide spillage (SW 408) | Complied |
| Waste type | Source | | | | | | | | | | | | |
| Empty chemical containers (SW409) | Process of chemical application at lab and water treatment plant | | | | | | | | | | | | |
| Empty chemical packaging (SW 409) | | | | | | | | | | | | | |
| Empty hydrocarbon containers (SW 409) | Workshop | | | | | | | | | | | | |
| Batteries (SW 102) | | | | | | | | | | | | | |
| Spent oil (SW 305) | | | | | | | | | | | | | |
| Hydrocarbon / pesticide spillage (SW 408) | | | | | | | | | | | | | |

| | | | | |
|--|--|--|----------------------------------|--|
| | | Contaminated soil (leakage / spillage during transfer) (SW 408) | | |
| | | Contaminated rags / sacks (SW 410) | Fertilizer store, Chemical store | |
| | | Waste water (PCD)(SW 307) | PCD | |
| | | Worn PPE (SW 410) | PPE used by workers | |
| | | Liquid | | |
| | | Mixture of scheduled and non-scheduled waste (SW 422) | Any workstation | |
| | | Expired chemical(SW 430) | Chemical store, Fertilizer store | |
| | | Waste water (cleaning - lubricant store, Workshop wash-down)(SW 307) | Lubricant store, Workshop | |
| | | Medical | | |
| | | Used dressing materials (e.g. Gauze, lint & gloves, | Clinic | |

| | | <table border="1"> <tr> <td>Covid 19 test kit etc.) and needles (SW 404)</td> <td></td> </tr> <tr> <td>Broken computer equipments (SW 110)</td> <td rowspan="2">Office</td> </tr> <tr> <td>Spent bulbs , Electrical waste (SW 110/SW 109)</td> </tr> </table> | Covid 19 test kit etc.) and needles (SW 404) | | Broken computer equipments (SW 110) | Office | Spent bulbs , Electrical waste (SW 110/SW 109) | | | | | | | | | | | |
|--|----------|---|--|--------|-------------------------------------|----------|--|--------------|---------------|-------|--|--------------------------|----------|--------------------------|-----------------|--|--|--|
| Covid 19 test kit etc.) and needles (SW 404) | | | | | | | | | | | | | | | | | | |
| Broken computer equipments (SW 110) | Office | | | | | | | | | | | | | | | | | |
| Spent bulbs , Electrical waste (SW 110/SW 109) | | | | | | | | | | | | | | | | | | |
| | | <p>Non Scheduled Waste</p> <table border="1"> <thead> <tr> <th>Waste type</th> <th>Source</th> </tr> </thead> <tbody> <tr> <td>Domestic</td> <td rowspan="4">Linesite</td> </tr> <tr> <td>Plastics, Bottles (Recyclable material)</td> </tr> <tr> <td>Garden waste</td> </tr> <tr> <td>Kitchen waste</td> </tr> <tr> <td colspan="2">Scrap</td> </tr> <tr> <td>Used welding rod & tools</td> <td rowspan="2">Workshop</td> </tr> <tr> <td>Broken metal equipment's</td> </tr> <tr> <td colspan="2">Mill byproducts</td> </tr> </tbody> </table> | Waste type | Source | Domestic | Linesite | Plastics, Bottles (Recyclable material) | Garden waste | Kitchen waste | Scrap | | Used welding rod & tools | Workshop | Broken metal equipment's | Mill byproducts | | | |
| Waste type | Source | | | | | | | | | | | | | | | | | |
| Domestic | Linesite | | | | | | | | | | | | | | | | | |
| Plastics, Bottles (Recyclable material) | | | | | | | | | | | | | | | | | | |
| Garden waste | | | | | | | | | | | | | | | | | | |
| Kitchen waste | | | | | | | | | | | | | | | | | | |
| Scrap | | | | | | | | | | | | | | | | | | |
| Used welding rod & tools | Workshop | | | | | | | | | | | | | | | | | |
| Broken metal equipment's | | | | | | | | | | | | | | | | | | |
| Mill byproducts | | | | | | | | | | | | | | | | | | |

| | | | |
|--|--|---------------------------------|---------------------------|
| | | POME | Process extraction of CPO |
| | | EFB | |
| | | Shredded Fiber | |
| | | Shell | |
| | | Boiler Ash | |
| | | Liquid Waste | |
| | | Effluent Discharge (land) | Furrow |
| | | Septic tank overflow & spillage | Linesite |
| | | Rubber Materials | |
| | | Tyre / broken rubber equipments | Workshop |
| | | Office | |
| | | Used Paper | Office |
| | | Spent printer cartridges | |
| | | Emmissions | |

| | | | | | |
|-----------------------------------|---|---|-----------------------------------|------------|--|
| | | <table border="1" style="width: 100%;"> <tr> <td style="width: 50%;">Black smoke / dust/ air pollutant</td> <td style="width: 50%;">Mill stack</td> </tr> </table> <p>The operating units has established waste management plan as per waste identification. The plan was reviewed on annually basis.</p> | Black smoke / dust/ air pollutant | Mill stack | |
| Black smoke / dust/ air pollutant | Mill stack | | | | |
| 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>The operating units has established and documented Waste and Pollution Management Plan as per waste identification. The plan was reviewed on annually basis. The plan includes Waste Type, Source, Action, Frequency, Records, and Person Responsible.</p> <p>Kulim (M) Berhad has established procedure to handle scheduled waste generated documented in Labelling, handling, storage and disposal of scheduled waste. Refer documents no LTM/WI/19, rev. no. 2 dated 01/10/2020.</p> <p>The estate demonstrated the proper disposal of waste material base on the waste management plan and SOP established. Review the implementation of the management plan established as follows:</p> <p>Tereh Palm Oil Mill</p> <ol style="list-style-type: none"> 1. The mill disposed EFB by sending to the sister estate for EFB field application or converted to compost as one of the nutrient cycle program. Reviewed the records of EFB field application recorded at 42,568.52 tons and converted to bio-compost recorded at 4,645.17 tons. 2. The mill continuously provide awareness on the scheduled waste management. Reviewed the the scheduled waste training records dated 31/01/2021, 03/03/2021 and 14/03/2021. 3. The mill maintain the records of inventory of scheduled waste generated by mill operation and notify to DOE through ESWISS. Reviewed the inventory records for the month of February | Complied | | |

| | | | |
|--|--|--|--|
| | | <p>2022, January 2022, December 2021, November 2021 and October 2021.</p> <p>4. The mill disposed the scheduled waste generated through licensed operator, Kualiti Alam Sdn. Bhd. reviewed the disposal records as follows:</p> <ul style="list-style-type: none"> a. 04/10/2021, SW 404, C/Note no. 20211004119WXT0F b. 07/09/2021, SW 305, C/Note no. 2021090712JSGLEZ c. 07/09/2021, SW 410, C/Note no. 2021090711GHRBXI d. 07/09/2021, SW 410, C/Note no. 20210907117T1SQ2 e. 07/09/2021, SW 409, C/Note no. 2021090712UN4K17 f. 07/09/2021, SW 110, C/Note no. 2021090711JKYPQB <p>5. The mill conducted domestic waste collection twice a week and disposed at the designated landfill. Reviewed the domestic was collection records dated 10/09/2021, 14/09/2021, 03/12/2021, 06/12/2021, 21/02/2021 and 25/02/2021. Noted during site visit at the landfill, no scheduled waste or recycle waste disposed at the landfill.</p> <p>Sg. Tawing Estate</p> <p>1. The estate maintain the records of inventory of scheduled waste generated by mill operation and notify to DOE through ESWISS. Reviewed the inventory records for the month of February 2022, January 2022, December 2021, November 2021 and October 2021.</p> <p>2. The estate disposed the scheduled waste generated through licensed operator, Kualiti Alam Sdn. Bhd. reviewed the disposal records as follows:</p> <ul style="list-style-type: none"> a. 25/01/2022, SW 410, C/Note no. 2022012516ZFOR4C | |
|--|--|--|--|

| | | | |
|--|--|--|--|
| | | <ul style="list-style-type: none"> b. 25/01/2022, SW 410, C/Note no. 2022012516DWYJFL c. 25/01/2022, SW 409, C/Note no. 2022012516HZUQKL d. 25/01/2022, SW 408, C/Note no. 2022012516KIFXWZ e. 03/03/2022, SW 404, C/Note no. 2022030312YOC18E f. 25/01/2022, SW 307, C/Note no. 2022012516A1LEHJ g. 25/01/2022, SW 305, C/Note no. 20220125161LPCYQ h. 25/01/2022, SW 110, C/Note no. 2022012516JKL58A i. 25/01/2022, SW 109, C/Note no. 2022012516E4VK5B j. 25/01/2022, SW 102, C/Note no. 2022012516ZVLQ8T <p>3. The estate conducted domestic waste collection twice a week. Reviewed the collection records dated 10/01/2022, 13/01/2022, 18/02/2022 and 21/02/2022.</p> <p>4. Empty chemical containers were triple rinse, reused back as pre-mixing chemical containers or punctured and stored at designated store. Reviewed the inventory records for chemical containers for Blocus, Glyphosate, Storm and Foxil for the month of December 2021, January and February 2022.</p> <p>Selai Estate and Enggang Div.</p> <p>1. The estate conducted domestic waste collection twice a week. Reviewed the collection records dated 08/07/2021, 12/07/2021, 15/07/2021, 19/07/2021, 22/01/2022, 26/01/2022 and 28/01/2022.</p> <p>2. The waste water from chemical premixing activities were collected in collection sump. The waste water were pump and reuse back for chemical premixing operation.</p> | |
|--|--|--|--|

| | | | |
|--|--|--|--|
| | | <p>3. The estate maintain the inventory for scheduled waste generated and reported to DOE through ESWISS. Reviewed the ESWISS 5th Scheduled reports dated 28/02/202231/12/2021.</p> <p>4. The estate disposed the scheduled waste generated through licensed operator, Kualiti Alam Sdn. Bhd. reviewed the disposal records as follows:</p> <ul style="list-style-type: none"> a. 19/12/2021, SW 306, C/Note no. 20211219137JEGR2 b. 19/12/2021, SW 410, C/Note no. 2021121913OGKY0N c. 19/12/2021, SW 409, C/Note no. 20211219144EMO93 d. 09/03/2022, SW 404, C/Note no. 2022030311F9NJBK e. 19/12/2021, SW 408, C/Note no. 2021121913HDZW0L <p>FGV Paloh Estate</p> <p>1. The estate monitor the inventory of empty chemical containers generated and recorded in "Binkad Tong Kosong & Bilasan 3 Kali". Reviewed records for Triclopyr, Nurelle, Sodium, Decis Deltamethrin, Cypermethrin and miracle for the month of November 2021, December 2021 and January 2022.</p> <p>2. The estate disposed the empty containers at centralised collection centre at FGV Maokil Estate 6. Reviewed the latest disposal records dated 21/01/2021 and 17/02/2022. The collection centre has submitted a copy of disposal records to the estate. Reviewed the consignment note no. 0163602 dated 28/10/2021.</p> <p>3. The estate conducted domestic waste collection three times a week. Reviewed the collection records dated 15/11/2021, 18/11/2021, 22/11/2021, 22/12/2021, 24/12/2021 and 27/12/2021.</p> | |
|--|--|--|--|

| | | | |
|--|---|--|----------|
| | | 4. Vehicle and machineries was conducted by appointed contractors. The waste generated was collected and disposed by the contractor as the contractor has acquired approval letter by the DOE to conduct scheduled waste disposal outside premise. Refer letter no. SBU/JENTERA (AD)/M.12 (064).21 dated 06/10/2021. Reviewed the job verification form no. 01242, 01243, 42320, 42238 and 01195. | |
| 7.3.3 | The unit of certification does not use open fire for waste disposal. - Minor compliance - | No evidence of fire use for waste disposal. Domestic waste was disposed in landfill area. No evidence of scheduled waste or recycle waste were found in the landfill. For replanting, the old palms were felled, shredded, windrowed and left to decompose. | Complied |
| Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield. | | | |
| 7.4.1 | Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance - | SOPs of good agricultural practices to manage soil fertility to optimise yield and minimise environmental impacts were documented in Kulim (Malaysia) Berhad – Agricultural Manual under section D: Manuring. The procedure includes: D01 – General Information D02 – Methods of Applications D03 – Precision Manuring D04 – Quality Check and Storage D05 – EFB Utilization D06 – POME Utilization D07 – MIWAMAS Composting System D08 – Bio-compost Application D09 – Bio-compost : Quality Check | Complied |

| | | | |
|--------------|--|--|-----------------|
| <p>7.4.2</p> | <p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - 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 conduct for every year while for soil analysis, the frequency for soil sampling is conducted at 5 years intervals (Leaf and Soil Sampling Notes Procedure - Kulim (M) Bhd.</p> <p>Reviewed the sampling records as follows:</p> <p><u>Sg. Tawing Estate</u></p> <p>Latest soil sampling was conducted in July 2020 as per test report no. SI/2008/0109-0112, SI/2008/0113-0116 and SI/2008 and 0117-0120 dated 11/08/2020</p> <p>Latest leaf sampling was conducted on 27/09/2021 – 07/10/2021 as per test report no. LI/2021/10/151 dated 18/10/2021.</p> <p><u>Selai Estate and Enggang Div.</u></p> <p>Latest soil sampling was conducted in April 2021 as per test report no. SI/2021/04/38 dated 19/04/2021.</p> <p>For Selai Div., latest leaf sampling was conducted on 25/05/2021 – 11/07/2021 as per report no. LI/2021/07/121 dated 27/07/2021. For Enggang Div., latest leaf sampling was conducted in April 2021 as per report no. LI/2021/04/65 dated 20/04/2021.</p> <p><u>FGV Paloh Estate</u></p> <p>Latest soil sampling was conducted in April 2021 as per test report no. FRF20220119 dated 15/04/2021</p> | <p>Complied</p> |
|--------------|--|--|-----------------|

| | | | | | | | | | | | | | |
|-------------------------|--|--|-------------------------|-------------------------|--------------|--------------|----------------------|----------------------|-----------|----------|-------------------------|-------------------------|----------|
| | | Latest leaf sampling was conducted in in April 2021 as per test report no. FRS20220117 dated 15/04/2021. | | | | | | | | | | | |
| 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 - | <p>The following practices are applied in the estates in relation to the nutrient recycling strategy;</p> <ol style="list-style-type: none"> 1. EFB application in designated fields at dosage of 50 mt/ha applied in inter rows subject to Agronomist recommendations. 2. Cut frond are stacked in between the palms rows left to discompose. 3. Bio compost application in selected fields at rate of 7mt/ha 4. POME utilization using tractor tanker and furrow system at 17mt/ha or 125kg/palm at the host estate of Tereh Palm Oil Mill. <p>As todate August 2021, 26.550.68 tons of EFB were applied at the sister estate and 1639.25 tons of EFB were converted to bio-compost.</p> | Complied | | | | | | | | | | |
| 7.4.4 | Records of fertiliser inputs are maintained. - Minor compliance - | <p>The estate maintain the records of manuring application as per recommendation by the agronomist.</p> <p>Observed application records as per agronomist recommendation:</p> <p>Sg. Tawing Estate</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Month program: Feb 2021</td> <td style="width: 50%;">Month program: Mar 2021</td> </tr> <tr> <td>Field: P00/1</td> <td>Field: P03/2</td> </tr> <tr> <td>Ha program: 31.05 ha</td> <td>Ha program: 72.39 ha</td> </tr> <tr> <td>Type: MOP</td> <td>Type: AS</td> </tr> <tr> <td>Rate/palm: 1.50 kg/palm</td> <td>Rate/palm: 2.50 kg/palm</td> </tr> </table> | Month program: Feb 2021 | Month program: Mar 2021 | Field: P00/1 | Field: P03/2 | Ha program: 31.05 ha | Ha program: 72.39 ha | Type: MOP | Type: AS | Rate/palm: 1.50 kg/palm | Rate/palm: 2.50 kg/palm | Complied |
| Month program: Feb 2021 | Month program: Mar 2021 | | | | | | | | | | | | |
| Field: P00/1 | Field: P03/2 | | | | | | | | | | | | |
| Ha program: 31.05 ha | Ha program: 72.39 ha | | | | | | | | | | | | |
| Type: MOP | Type: AS | | | | | | | | | | | | |
| Rate/palm: 1.50 kg/palm | Rate/palm: 2.50 kg/palm | | | | | | | | | | | | |

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

| | | | | |
|--|--|--|---------------------------|--|
| | | Month completed: Apr 2021 | Month completed: Dec 2021 | |
| Selai Estate. | | | | |
| Month program: Mar 2021 Field: P06E/2 Ha program: 54.98 ha Type: Mix2+B Rate/palm: 3.00 kg/palm Month completed: Aug 2021 | | Month program: Apr 2021 Field: P08E/2 Ha program: 46.47 ha Type: BRP Rate/palm: 1.50 kg/palm Month completed: june 2021 | | |
| Month program: Apr 2021 Field: P09/2 Ha program: 38.24 ha Type: AS Rate/palm: 2.50 kg/palm Month completed: Jul 2021 | | Month program: Sep 2021 Field: P11/3 Ha program: 50.24 ha Type: AS Rate/palm: 2.50 kg/palm Month completed: Nov 2021 | | |
| FGV Paloh estate | | | | |
| Month program: Jun – Jul 2021 Field: PR 18F Ha program: 63.16 ha Type: MOP | | Month program: Jun – Jul 2021 Field: PR 19G Ha program: 243.21 ha Type: MOP | | |

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

| | | Rate/palm: 1.00 kg/palm Month completed: Oct 2021 | Rate/palm: 1.00 kg/palm Month completed: Nov 2021 | | | | | | | | | |
|--|--|--|--|----------|-------------|-------------------|--|------------------------------|---|------------------|---|----------|
| Criterion 7.5: Practices minimise and control erosion and degradation of soils. | | | | | | | | | | | | |
| 7.5.1 | <p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p> | <p>The operating units has identified the soil series in the estates and established soil series maps. Soil series identified in the estates as follows:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Soil Series</th> </tr> </thead> <tbody> <tr> <td>Sg. Tawing Estate</td> <td>Jabi-Tepus, Local Aluvium, Batu Lapan, Bungor, Chat, Gajah mati, Gong Chenak, Harimau, kechor, Kuala Brang, Padang Besar, Serdang, Stiawan, Slime Tailings, Taitak, Tawar, tebok, Tepus, terap</td> </tr> <tr> <td>Selai Estate and Enggang Div</td> <td>Oragnic Clay & muck, Batang Merbau, Binjai, Chempaka, Harimau, Holyrood, Jabil, Kechor, lubok Itek, Pelepah, Rengam, Sogomana, Tebok, Tepus, Tok Yong</td> </tr> <tr> <td>FGV Paloh Estate</td> <td>Holyrood, Rengam, Durian, Munchong, Chempaka, Sogomana,</td> </tr> </tbody> </table> | | Estate | Soil Series | Sg. Tawing Estate | Jabi-Tepus, Local Aluvium, Batu Lapan, Bungor, Chat, Gajah mati, Gong Chenak, Harimau, kechor, Kuala Brang, Padang Besar, Serdang, Stiawan, Slime Tailings, Taitak, Tawar, tebok, Tepus, terap | Selai Estate and Enggang Div | Oragnic Clay & muck, Batang Merbau, Binjai, Chempaka, Harimau, Holyrood, Jabil, Kechor, lubok Itek, Pelepah, Rengam, Sogomana, Tebok, Tepus, Tok Yong | FGV Paloh Estate | Holyrood, Rengam, Durian, Munchong, Chempaka, Sogomana, | Complied |
| Estate | Soil Series | | | | | | | | | | | |
| Sg. Tawing Estate | Jabi-Tepus, Local Aluvium, Batu Lapan, Bungor, Chat, Gajah mati, Gong Chenak, Harimau, kechor, Kuala Brang, Padang Besar, Serdang, Stiawan, Slime Tailings, Taitak, Tawar, tebok, Tepus, terap | | | | | | | | | | | |
| Selai Estate and Enggang Div | Oragnic Clay & muck, Batang Merbau, Binjai, Chempaka, Harimau, Holyrood, Jabil, Kechor, lubok Itek, Pelepah, Rengam, Sogomana, Tebok, Tepus, Tok Yong | | | | | | | | | | | |
| FGV Paloh Estate | Holyrood, Rengam, Durian, Munchong, Chempaka, Sogomana, | | | | | | | | | | | |
| 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 | Addressed in the Agricultural Manual under chapter as follows: 1. A07 – Terrace and Platform Construction | | Complied | | | | | | | | |

| | contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance - | 2. A07A – Palm Lining and Terrace 3. A08 – Harvester Path Construction 4. A17 – Protection of Natural Water Courses and 5. A18 – Water Management Plan in Peat Area. No replanting was conducted on steep slopes more than 25 degree. | | | | | | | | | |
|--|---|--|----------------------|-----------------------|-------------------|----------------------|-------|-------|-------|-------|----------|
| 7.5.3 | There is no new planting of oil palm on steep terrain. - Minor compliance - | No new planting conducted at all estates visited as verified and sighted during site visit. | Complied | | | | | | | | |
| Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations. | | | | | | | | | | | |
| 7.6.1 | (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance - | Soil series and topography map available for estate sampled. No fragile soil categorized in the estates sampled. The estate have taken into account the land terrain, drainage and road systems in planning the 2021 replanting. | 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 - | Addressed in the Agricultural Manual under chapter as follows: 1. A07 – Terrace and Platform Construction 2. A07A – Palm Lining and Terrace 3. A08 – Harvester Path Construction 4. A17 – Protection of Natural Water Courses and 5. A18 – Water Management Plan in Peat Area. | Complied | | | | | | | | |
| 7.6.3 | Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance - | The Agronomy Advisory and Services Department conducted assessment and provided the estates with topography maps. Sampled topography information at estates sited as follows: <table border="1" data-bbox="1137 1257 1899 1385"> <thead> <tr> <th></th> <th>Sg. Tawing Estate (%)</th> <th>Selai Estate. (%)</th> <th>FGV Paloh Estate (%)</th> </tr> </thead> <tbody> <tr> <td>0°-2°</td> <td>22.66</td> <td>49.20</td> <td>14.00</td> </tr> </tbody> </table> | | Sg. Tawing Estate (%) | Selai Estate. (%) | FGV Paloh Estate (%) | 0°-2° | 22.66 | 49.20 | 14.00 | Complied |
| | Sg. Tawing Estate (%) | Selai Estate. (%) | FGV Paloh Estate (%) | | | | | | | | |
| 0°-2° | 22.66 | 49.20 | 14.00 | | | | | | | | |

| | | | | | | |
|--|---|--|-------|-------|-------|----------|
| | | 2°-6° | 42.48 | 21.49 | 30.00 | |
| | | 6°-12° | 26.65 | 29.31 | 49.00 | |
| | | 12°-20° | 6.94 | 0.00 | 7.00 | |
| | | 20°-25° | 1.00 | 0.00 | 0.00 | |
| | | >25° | 0.27 | 0.00 | 0.00 | |
| Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly. | | | | | | |
| 7.7.1 | (C) 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 estates sampled. There was also no new planting in the estates. | | | | Complied |
| 7.7.2 | Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: 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 estates sampled. There was also no new planting in the estates. | | | | Complied |
| 7.7.3 | (C) 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 estates sampled. There was also no new planting in the estates. | | | | Complied |
| 7.7.4 | (C) 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 estates sampled. There was also no new planting in the estates. | | | | Complied |
| 7.7.5 | (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. | There is no peat soil or soil categorized as marginal or fragile soil in all estates sampled. There was also no new planting in the estates. | | | | Complied |

| | | | |
|--|--|--|-----------------|
| | <p>The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p> | | |
| 7.7.6 | <p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p> | <p>There is no peat soil or soil categorized as marginal or fragile soil in all estates sampled. There was also no new planting in the estates.</p> | <p>Complied</p> |
| 7.7.7 | <p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p> | <p>There is no peat soil or soil categorized as marginal or fragile soil in all estates sampled. There was also no new planting in the estates.</p> | <p>Complied</p> |
| <p>Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.</p> | | | |
| 7.8.1 | <p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> | <p>The operating units has established a water management plan documented in Estates Water Management Plan dated 01/08/2021. In the management plan stated the source of water, mill activity, water use, possible threat, action plan, timeline, monitoring records</p> | <p>Complied</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>and person responsible. The action plan focusing on possible threats such as water pollution, drought, and capacity of water reduce in reservoir, flood interruption/clogging of water flow at drainage system and wastage of water.</p> <p>The mill monitors the water consumption/FFB on monthly basis. As todate FY 2021, the average water consumption for mill processing and domestic usage per FFB processed recorded at 1.52 Liter/ton.</p> <p>As the operating unit provided access to clean water to all workers through own water treatment plant, they conducted drinking water analysis on annually basis to ensure the quality of water provided. Reviewed the water sampling results for analysis conducted on 24/05/2021.refer report no. LW/570/2021 (FGV Paloh Estate) LW/575/2021 (Sg. Tawing Estate) and LW/579/2021 (Enggang Estate) dated 14/06/2021.</p> <p>The estates conducted Inlet and Outlet water sampling on monthly basis after conducting fertiliser application. Reviewed the water sampling records as follows:</p> <p><u>Sg. Tawing Estate</u></p> <ol style="list-style-type: none"> 1. WI/2021/09/444 dated 23/09/2021 2. WI/2021/08/291 dated 22/08/2021 3. WI/2021/07/251 dated 30/07/2021 <p><u>Enggang Estate</u></p> <ol style="list-style-type: none"> 1. WI/2021/09/420 dated 09/09/2021 2. WI/2021/08/372 dated 13/08/2021 3. WI/2021/07/336 dated 16/07/2021 <p><u>FGV Paloh Estate</u></p> <ol style="list-style-type: none"> 1. LW/571/(1-3)/21 dated 14/06/2021 | |
|--|---|---|--|

| <p>7.8.2</p> | <p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p> | <p>Kulim (M) Berhad has established procedure for water course and wetland protection documented in the Agricultural Manual under chapter A17 – Protection of Natural Water Courses dated 19/11/2018. The river buffer zone as follows:</p> <table border="1" data-bbox="1137 507 1926 805"> <thead> <tr> <th>River size</th> <th>Reserve area on each side (M)</th> </tr> </thead> <tbody> <tr> <td>>40m</td> <td>50m</td> </tr> <tr> <td>Between 20m – 40m</td> <td>40m</td> </tr> <tr> <td>Between 10m – 20m</td> <td>20m</td> </tr> <tr> <td>Between 5m – 10m</td> <td>10m</td> </tr> <tr> <td><5m</td> <td>5m</td> </tr> </tbody> </table> <p>As stated in the procedure, no development is allowed in the buffer zone area for either replanting or new planting.</p> <p><u>Sg. Tawing Estate</u></p> <p>Sighted during site visit at old field P00/03, buffer zone of Sg. Mamat, area were demarcated with white and blue ring at the palm trunks. For replanting area at field P20/4, buffer zone area for Sg. Mamat and Sg. Tawing were demarcated with blue and white pole. No evidence of chemical application at the buffer zone area.</p> <p><u>Selai Estate and Enggang Div.</u></p> <p>Sighted during site visit at P10/01, buffer zone for Sg. Selai and P06/1, buffer zone for Sg. Sembrong, the rea was demarcate with blue and white ring at palms trunks. The vegetation along the area was well maintained and no evidence of chemical application in the area.</p> | River size | Reserve area on each side (M) | >40m | 50m | Between 20m – 40m | 40m | Between 10m – 20m | 20m | Between 5m – 10m | 10m | <5m | 5m | <p>Complied</p> |
|-------------------|--|--|------------|-------------------------------|------|-----|-------------------|-----|-------------------|-----|------------------|-----|-----|----|-----------------|
| River size | Reserve area on each side (M) | | | | | | | | | | | | | | |
| >40m | 50m | | | | | | | | | | | | | | |
| Between 20m – 40m | 40m | | | | | | | | | | | | | | |
| Between 10m – 20m | 20m | | | | | | | | | | | | | | |
| Between 5m – 10m | 10m | | | | | | | | | | | | | | |
| <5m | 5m | | | | | | | | | | | | | | |

| | | <p><u>FGV Paloh Estate</u></p> <p>Protection of water course is guided by its established procedure, River Riparian Buffer zone Management. Refer document no. FGVPM/L2/PAS-03, rev. 1.0, dated 23/10/2020. Based on the procedure, river buffer zone must be demarcated with blue and white colour pole. The width of buffer zones to be established are as per Guideline on River Reserve from Drainage and Irrigation, Department Peninsular Malaysia.</p> <p>Sighted during site visit at field PM98C, buffer zone area for Sg. Selai and Sg. Tamok, the buffer zone was demarcated with blue and white colour ring at palm trunks. No evidence of chemical application at the buffer zone area.</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>Mill effluent is treated through biological anaerobic treatment. Regular monitoring was conducted as per requirement. Monthly and quarterly report was submitted to DOE accordingly. Reviewed the Quarterly Return Form to DOE as follows:</p> <p>4th quarter 2020:</p> <table border="1" data-bbox="1256 962 1809 1383"> <thead> <tr> <th>Month</th> <th>Parameter</th> <th>Results</th> </tr> </thead> <tbody> <tr> <td rowspan="2">October</td> <td>BOD</td> <td>2140.00</td> </tr> <tr> <td>pH</td> <td>7.30</td> </tr> <tr> <td rowspan="2">November</td> <td>BOD</td> <td>N/A</td> </tr> <tr> <td>pH</td> <td>N/A</td> </tr> <tr> <td>December</td> <td>BOD</td> <td>N/A</td> </tr> </tbody> </table> | Month | Parameter | Results | October | BOD | 2140.00 | pH | 7.30 | November | BOD | N/A | pH | N/A | December | BOD | N/A | Complied |
| Month | Parameter | Results | | | | | | | | | | | | | | | | | |
| October | BOD | 2140.00 | | | | | | | | | | | | | | | | | |
| | pH | 7.30 | | | | | | | | | | | | | | | | | |
| November | BOD | N/A | | | | | | | | | | | | | | | | | |
| | pH | N/A | | | | | | | | | | | | | | | | | |
| December | BOD | N/A | | | | | | | | | | | | | | | | | |

| | | | | | |
|--|--|-------------------------------|-----------|---------|--|
| | | | pH | N/A | |
| | | 1 st quarter 2021: | | | |
| | | Month | Parameter | Results | |
| | | January | BOD | 1940.00 | |
| | | | pH | 7.30 | |
| | | February | BOD | 2340.00 | |
| | | | pH | 7.50 | |
| | | March | BOD | 3065.00 | |
| | | | pH | 7.50 | |
| | | 2 nd quarter 2021: | | | |
| | | Month | Parameter | Results | |
| | | April | BOD | 333.00 | |
| | | | pH | 7.90 | |
| | | May | BOD | 382.00 | |

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

| | | | | | | |
|---|--|---------|------|------|------|--|
| | | Aug | 0.97 | 0.28 | 1.25 | |
| | | Sep | 1.09 | 0.34 | 1.43 | |
| | | Oct | 1.30 | 0.32 | 1.62 | |
| | | Nov | 1.04 | 0.26 | 1.31 | |
| | | Dec | 1.29 | 0.30 | 1.58 | |
| | | Average | 1.14 | 0.39 | 1.52 | |
| <p>The water consumption for mill processing was acceptable as the target was at 1.20L/ton FFB processed.</p> | | | | | | |

Criterion 7.9: 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>Plan to reduce the usage of the non-renewable energy has been established and monitored on monthly basis. reviewed the records as todate FY 2021 as follows:</p> <table border="1"> <thead> <tr> <th rowspan="2">Month</th> <th colspan="2">Tereh Palm Oil Mill</th> <th colspan="2">Sg. Tawing Estate</th> <th colspan="2">Selai Estate and Enggang Div.</th> <th colspan="2">FGV Paloh Estate</th> </tr> <tr> <th>2020</th> <th>2021</th> <th>2020</th> <th>2021</th> <th>2020</th> <th>2021</th> <th>2020</th> <th>2021</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>0.49</td> <td>1.93</td> <td>8.00</td> <td>8.67</td> <td>8.78</td> <td>7.91</td> <td>5.44</td> <td>0.77</td> </tr> <tr> <td>Feb</td> <td>0.53</td> <td>1.28</td> <td>6.44</td> <td>10.57</td> <td>8.97</td> <td>6.76</td> <td>7.20</td> <td>0.79</td> </tr> <tr> <td>Mar</td> <td>0.77</td> <td>1.08</td> <td>6.67</td> <td>9.71</td> <td>8.85</td> <td>6.75</td> <td>6.67</td> <td>0.91</td> </tr> <tr> <td>Apr</td> <td>0.82</td> <td>0.55</td> <td>4.74</td> <td>6.32</td> <td>11.05</td> <td>6.08</td> <td>5.16</td> <td>0.99</td> </tr> <tr> <td>May</td> <td>0.56</td> <td>1.00</td> <td>4.36</td> <td>6.28</td> <td>9.33</td> <td>5.53</td> <td>5.60</td> <td>0.98</td> </tr> </tbody> </table> | Month | Tereh Palm Oil Mill | | Sg. Tawing Estate | | Selai Estate and Enggang Div. | | FGV Paloh Estate | | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 | Jan | 0.49 | 1.93 | 8.00 | 8.67 | 8.78 | 7.91 | 5.44 | 0.77 | Feb | 0.53 | 1.28 | 6.44 | 10.57 | 8.97 | 6.76 | 7.20 | 0.79 | Mar | 0.77 | 1.08 | 6.67 | 9.71 | 8.85 | 6.75 | 6.67 | 0.91 | Apr | 0.82 | 0.55 | 4.74 | 6.32 | 11.05 | 6.08 | 5.16 | 0.99 | May | 0.56 | 1.00 | 4.36 | 6.28 | 9.33 | 5.53 | 5.60 | 0.98 | Complied |
|-------|--|---|-------|---------------------|-------|-------------------------------|------|-------------------------------|--|------------------|--|------|------|------|------|------|------|------|------|-----|------|------|------|------|------|------|------|------|-----|------|------|------|-------|------|------|------|------|-----|------|------|------|------|------|------|------|------|-----|------|------|------|------|-------|------|------|------|-----|------|------|------|------|------|------|------|------|----------|
| Month | Tereh Palm Oil Mill | | | Sg. Tawing Estate | | Selai Estate and Enggang Div. | | FGV Paloh Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jan | 0.49 | 1.93 | 8.00 | 8.67 | 8.78 | 7.91 | 5.44 | 0.77 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Feb | 0.53 | 1.28 | 6.44 | 10.57 | 8.97 | 6.76 | 7.20 | 0.79 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mar | 0.77 | 1.08 | 6.67 | 9.71 | 8.85 | 6.75 | 6.67 | 0.91 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Apr | 0.82 | 0.55 | 4.74 | 6.32 | 11.05 | 6.08 | 5.16 | 0.99 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| May | 0.56 | 1.00 | 4.36 | 6.28 | 9.33 | 5.53 | 5.60 | 0.98 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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

| | | | | | | | | | | | |
|---|---|--|------|------|------|------|------|------|-------|------|----------|
| | | Jun | 0.64 | 2.66 | 4.19 | 7.24 | 5.74 | 5.42 | 4.74 | 0.88 | |
| | | Jul | 0.78 | 0.94 | 4.28 | 6.28 | 8.67 | 5.36 | 5.78 | 0.96 | |
| | | Aug | 0.80 | 0.57 | 4.66 | 5.97 | 8.68 | 4.84 | 13.49 | 0.96 | |
| | | Sep | 0.65 | 0.86 | 5.08 | 5.77 | 8.27 | 5.31 | 15.96 | 0.79 | |
| | | Oct | 0.60 | 0.79 | 5.26 | 5.18 | 6.91 | 4.57 | 18.66 | 0.81 | |
| | | Nov | 0.95 | 0.67 | 5.57 | 5.20 | 8.24 | 4.36 | 28.90 | 0.78 | |
| | | Dec | 1.04 | 0.47 | 8.61 | 5.89 | 9.75 | 4.85 | 34.01 | 0.94 | |
| | | Ave | 0.70 | 0.92 | 5.34 | 6.56 | 8.40 | 5.40 | 12.63 | 0.88 | |
| Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions. | | | | | | | | | | | |
| 7.10.1 | (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported. - Critical (Major) compliance - | Monitoring and reporting of the significant pollutants to water, gaseous emissions to air and contamination on land are in place. Tools and systems used include the DOE online CEMS monitoring for air emissions, water quality at discharge points as per DID regulations and SW disposal were adhering to DOE requirements. Water samples were regularly taken every month and tested by mill environment officer in charge and analysed to ensure compliance to DOE requirements at final discharge points. Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 4.0 which is submitted to the RSPO Secretariat. Based on verification of various record, the data in the RSPO PalmGHG Calculator was correct. | | | | | | | | | Complied |
| 7.10.2 | (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from | No development within Tereh Palm Oil Mill and Supply Base since 2014. | | | | | | | | | Complied |

| | | | |
|---------------|---|---|-----------------|
| | <p>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>7.10.3</p> | <p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p> | <p>Significant pollutants identification was conducted during environmental impact assessment and plans are documented under environmental management plan. Implementation of plan is being monitored by appointed person in charge with target of time frame for completion.</p> <p>Reviewed the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> 1. The mill monitored the ESP performance on daily basis. Reviewed the monitoring records in ESP Performance Monitoring Data Recording dated 14/12/2021, 12/12/2021, 21/10/2021, 19/10/2021, 24/09/2021 and 23/09/2021. The reading recorded were as per Environmental Quality (Clean Air) Regulation 2014 standard at 150 mg/m³. 2. The estate conducted stack sampling twice a year. Reviewed the latest stack sampling conducted on 30/11/2021. Refer report no. Tereh6-6/11/2021 dated 06/12/2021. 3. The estate conducted stack sampling twice a year. Reviewed the latest stack sampling conducted on 30/11/2021. Refer report no. Tereh6-6/11/2021 dated 06/12/2021. 4. The mill conducted tank and machine on timely basis to ensure no leakage and spillage. For machinery, the mill conducted inspection on monthly basis. Reviewed the inspection records documented in Electrical Workshop Preventive and Maintenance Schedule for the month of January and February 2022. For oil tank, the inspection was conducted on quarterly basis prior to | <p>Complied</p> |

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

| | | | |
|---|---|---|----------|
| | | Safety and Health committee meeting. Reviewed the inspection records dated 12 – 13/12/2021. | |
| Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area | | | |
| 7.11.1 | (C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance - | There was no new planting and replanting which were prepared by burning and this practice is in line with Sustainability handbook as well as stick to the spirit of Kulim Environmental Policy (signed by the Executive Director). It also encompass 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 - | For fire watch, the aerial monitoring Asean Fire Alert subscribed by Kulim has been used for hot spot area / peat soil area identification. This monitoring base on colour of Fire Weather Index (FWI). If the colour changes from blue into yellow the estate will standby for any emergency fire break. In case of any fire detected by AFA, an alert will be sent to PIC of the affected estate. On site preparedness, portable water browser is readily available to fight any potential fire. On top of AFA, estates perform daily Estate Patrol by their auxiliary police. The record of the patrolling was sighted. The monitoring for any fire at the estate will also be conducted by workers and "mandores". In case of any fire detected, the "mandores" will report to the management/security head. | Complied |
| 7.11.3 | The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance - | Engagement with adjacent stakeholders was done on 29 September 2021 at Enggang estate. This objective of the meeting was to educate and inform the stakeholders neighbouring with estate regarding Fire Management with BOMBA. The consideration is fire prevention and control measures especially during hot dry periods like drought. | Complied |
| Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced. | | | |

| 7.12.1 | <p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p> | <p>No new planting and land clearing since 15 November 2018.</p> <p>Kulim Plantation has conducted HCV assessment for all operating units and documented in reports as follows:</p> <p>Sg. Tawing Estate</p> <p>Addendum to RBA of fifteen oil palm plantations of Kulim (M) Bhd, Malaysia. Part two: fact sheets, A.J.F.M. Dekker – final report, Feb 2013: Sungai Tawing</p> <p>Selai Estate and Enggang Division</p> <p>RBA of fifteen oil palm plantations of Kulim (M) Bhd, Malaysia. Part two: fact sheets A.J.F.M. Dekker – final report, Feb 2013</p> <p>FGV Paloh Estate</p> <p>“Laporan Biodiversiti Ladang FGVPM Paloh” dated 07/03/2019</p> | Complied | | | | | | | | | | | | | | | | | | | | | | | |
|-------------------|--|--|---------------------------------------|--|----|---------------------------------------|-------------------|-------|-------|---------------------------|-------|------|---------------|-------|------|----------------------|-------|------|-------------|-------|------|-------------|-------|------|-------------|----------|
| 7.12.2 | <p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p> | <p>As per Addendum to RBA of fifteen oil palm plantations of Kulim (M) Bhd, Malaysia. Part two: fact sheets, A.J.F.M. Dekker – final report, Feb 2013: Sungai Tawing, RBA of fifteen oil palm plantations of Kulim (M) Bhd, Malaysia. Part two: fact sheets A.J.F.M. Dekker – final report, Feb 2013: Enggang and “Laporan Biodiversiti Ladang FGVPM Paloh” dated 07/03/2019, the summary of the identified HCV as follows:</p> <table border="1" data-bbox="1137 1066 1910 1396"> <thead> <tr> <th>Estate</th> <th></th> <th>Ha</th> <th>Biodiversity hotspot area and remarks</th> </tr> </thead> <tbody> <tr> <td rowspan="6">Sg. Tawing Estate</td> <td>P00/2</td> <td>21.84</td> <td>Forest Steep area (RBA 2)</td> </tr> <tr> <td>P04/3</td> <td>1.27</td> <td>Pond (RBA 12)</td> </tr> <tr> <td>P04/3</td> <td>0.47</td> <td>Buffer zone (RBA 12)</td> </tr> <tr> <td>P11/1</td> <td>0/14</td> <td>Buffer zone</td> </tr> <tr> <td>P11/2</td> <td>0.13</td> <td>Buffer zone</td> </tr> <tr> <td>P11/3</td> <td>0.19</td> <td>Buffer zone</td> </tr> </tbody> </table> | Estate | | Ha | Biodiversity hotspot area and remarks | Sg. Tawing Estate | P00/2 | 21.84 | Forest Steep area (RBA 2) | P04/3 | 1.27 | Pond (RBA 12) | P04/3 | 0.47 | Buffer zone (RBA 12) | P11/1 | 0/14 | Buffer zone | P11/2 | 0.13 | Buffer zone | P11/3 | 0.19 | Buffer zone | Complied |
| Estate | | Ha | Biodiversity hotspot area and remarks | | | | | | | | | | | | | | | | | | | | | | | |
| Sg. Tawing Estate | P00/2 | 21.84 | Forest Steep area (RBA 2) | | | | | | | | | | | | | | | | | | | | | | | |
| | P04/3 | 1.27 | Pond (RBA 12) | | | | | | | | | | | | | | | | | | | | | | | |
| | P04/3 | 0.47 | Buffer zone (RBA 12) | | | | | | | | | | | | | | | | | | | | | | | |
| | P11/1 | 0/14 | Buffer zone | | | | | | | | | | | | | | | | | | | | | | | |
| | P11/2 | 0.13 | Buffer zone | | | | | | | | | | | | | | | | | | | | | | | |
| | P11/3 | 0.19 | Buffer zone | | | | | | | | | | | | | | | | | | | | | | | |

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

| | | | | |
|--|------------------|--------|-------|--------------------------------|
| | | P11/4 | 0.75 | Buffer zone |
| | | 12/3 | 1.12 | Buffer zone |
| | | P12/4 | 0.53 | Buffer zone |
| | | P20/4 | 1.94 | River and Buffer zone (RBA 10) |
| | Selai Estate. | P06/1 | 1.13 | Shrub (RBA 4) |
| | | P06/3 | 0.47 | Swamp (RBA 3) |
| | | P09/1 | 1.28 | Pond buffer zone (RBA 8) |
| | | P12/1 | 12.24 | Pocket forest (RBA 1) |
| | | P13/4 | 16.31 | Pond (RBA 8) |
| | | | 1.51 | Buffer zone (RBA 8) |
| | | P06E/1 | 3.11 | Swampy area (RBA 8) |
| | | P11E/1 | 0.59 | Swampy Area |
| | | P11E/3 | 0.39 | Pond |
| | | P13E/2 | 2.07 | Water catchment (RBA 1) |
| | | | 1.08 | Buffer zone (RBA 1) |
| | | P14E/4 | 8.11 | Swampy area (Shrub)(RBA 6) |
| | FGV Paloh Estate | | | No HCV identified |
| <p>Selai Estate and Enggang Div. The estate proposed to conduct new planting at ex pineapple farm area located in the certified area that have been handed back to the estate management effective on 01/01/2020 as per letter from General Manager, Kulim Pineapple Farm to the Estate manager</p> | | | | |

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

| | | | |
|--------|---|---|----------------|
| | | <p>dated 22/09/2019 and letter from General Manager, Estates Operations Department dated 01/01/2020.</p> <p>The estate has conducted HCV assessment as per RBA of fifteen oil palm plantations of Kulim (M) Bhd, Malaysia. Part two: fact sheets A.J.F.M. Dekker – final report, Feb 2013. No HCV area identified in the proposed area.</p> <p>The estate has conducted Land Use Risk Identification as per report dated 15/08/2021 and Land Use Change Analysis as per report dated 25/11/2021 by Remote Sensing Executive, R&D and Agronomy Advisory. Base on the report, the area was felled from field P80 and P81 and was handed to Kulim Pineapple Farm for pineapple planting till handed back to the estate management effective on 01/01/2020. As per LURI report, the area was categorized under Low Risk area.</p> <p>Sighted during site visit at the area located in field P08/1, P08/2 and P08/3, the area was left at it is without any cultivation since hand over.</p> | |
| 7.12.3 | <i>Indicator is not applicable in Malaysia context</i> | | Not Applicable |
| 7.12.4 | <p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p> | <p>The estates has established Biodiversity Improvement Plan. The plan was divided into immediate action plan and long term strategies. In the plan stated the action, completion date and person responsible.</p> <p>Sg. Tawing Estate</p> <ol style="list-style-type: none"> 1. The operating units conducted the animal sighting to monitor the animal in the estate. Reviewed the the records FY 2021 as todate July 2021 for all estates samples. 2. As Sg. Tawing Estate Estate located adjacent to forest, the estate were exposed to animal conflicts such as elephant. The | Complied |

| | | | |
|--|--|--|--|
| | | <p>estate has installed elephant fencing to control/prevent the elephant encroachment.</p> <ol style="list-style-type: none"> 3. The estate conducted elephant fencing monitoring/patrolling on daily basis. Reviewed patrolling records dated 02/08/2021 and 06/07/2021. 4. If any evidence of encroachment, the estate will report to Wildlife Department through "e-aduan" portal. Reviewed latest report dated 12/09/2021. 5. The estate conducted biodiversity hotspot monitoring twice a month. Reviewed the monitoring records dated 10/01/2022, 29/01/2022, 09/02/2022 and 24/02/2022. <p>Selai Estate and Enggang Div.</p> <ol style="list-style-type: none"> 1. The estate conducted biodiversity hotspot monitoring twice a month. Reviewed the monitoring records dated 10/10/2021, 29/10/2021, 06/12/2021, 26/12/2021 and 03/01/2022. 2. The estate recorded the wildlife/animal sighting and recorded on monthly basis. Reviewed the animal sighting records for the month of January and February 2022. Among the wildlife sighted in the estate such as wildcat, hornbill, monkey, barn owl, snake/cobra, stork, crows, jungle fowl, fox, wild boar, wild dogs and squirrel. <p>FGV Paloh Estate</p> <ol style="list-style-type: none"> 1. The estate recorded the wildlife/animal sighting and recorded on quarterly basis. Reviewed the the animal sighting records in quarter 1st quarter, 2nd quarter, 3rd quarter, 4th quarter FY 2021 and 1st quarter of 2022. Among the wildlife sighted in the estate | |
|--|--|--|--|

| | | | |
|--------|---|---|----------|
| | | such as hornbill, snake/cobra, stork, crows, jungle fowl, fox, wild boar, wild dogs and squirrel. | |
| 7.12.5 | Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. - Minor compliance - | There was no rights of local communities been identified in HCV areas, HCS forest after 15/11/2018, peat land and other conservation areas. | Complied |
| 7.12.6 | All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. - Minor compliance - | The estates management continue to promote awareness on HCV/RTE to the workers during morning briefing and training. reviewed training records as follows: <ol style="list-style-type: none"> 1. Wildlife conflict management training at Sg. Tawing Estate dated 18/07/2021 2. Biodiversity and prohibition on keeping wildlife training at Enggang Estate dated 09/03/2021 3. HCV, RTE and biodiversity awareness briefing at FGV Paloh Estate dated 18/07/2021 Reviewed pictures taken at several strategic places in the estates visited such as office compound, muster ground, housing area and HCV area, signage on prohibition of capture, harm, collect or kill RTE species are erected. | Complied |
| 7.12.7 | The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. - Minor compliance - | The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15/11/2018 in the 3 estates sampled. Monitoring of these areas are made through the daily field supervision by the field staff and executives. Sg. Tawing Estate <ol style="list-style-type: none"> 1. The estate conducted animal sighting the estate and recorded by month. Reviewed the animal sighting records dated | Complied |

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

| | | | |
|--------|---|--|----------|
| | | <p>07/12/2021, 22/12/2021, 04/01/2022, 26/01/2022 and 18/02/2022. No RTE sighted in the estate. Common animal sighted were Jungle fowl, wild boar and snake.</p> <p>Selai Estate and Enggang Div.</p> <p>1. The estate recorded the wildlife/animal sighting and recorded on monthly basis. Reviewed the animal sighting records for the month of January and February 2022. Among the wildlife sighted in the estate such as wildcat, hornbill, monkey, barn owl, snake/cobra, stork, crows, jungle fowl, fox, wild boar, wild dogs and squirrel.</p> <p>FGV Paloh Estate</p> <p>1. The estate recorded the wildlife/animal sighting and recorded on quarterly basis. Reviewed the the animal sighting records in quarter 1st quarter, 2nd quarter, 3rd quarter, 4th quarter FY 2021 and 1st quarter of 2022. Among the wildlife sighted in the estate such as hornbill, snake/cobra, stork, crows, jungle fowl, fox, wild boar, wild dogs and squirrel.</p> | |
| 7.12.8 | <p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p> | <p>No land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018 within Tereh Palm Oil Mill and Supply Base.</p> | Complied |

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2019 and 2020** for **Tereh 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 datas include CPO produced, PKO Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in **2019 and 2020** for **Tereh Palm Oil Mill** and supply base are as following:

2019

| Emission per product | tCO ₂ e/tProduct |
|----------------------|-----------------------------|
| CPO | 1.28 |
| PKO | 1.28 |

| Extraction | % |
|------------|-------|
| OER | 21.65 |
| KER | 5.42 |

| Production | t/yr |
|--------------|------------|
| FFB Process | 351,753.11 |
| CPO Produced | 7,6142.11 |
| PKO Produced | 19,060.73 |

| Land Use | Ha |
|-----------------------------|------------------|
| OP Planted Area | 21,003.69 |
| OP Planted on peat | 1,366.44 |
| Conservation (forested) | 50.45 |
| Conservation (non-forested) | 192.64 |
| Total | 22,613.22 |

Summary of Field Emission and Sink

| | Own Crop* | | Group | | 3 rd Party | | Total | |
|--|--------------------|--------------------------|--------------------|--------------------------|-----------------------|--------------------------|--------------------|--------------------------|
| | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB |
| Emission | | | | | | | | |
| Land Conversion | 159,284.94 | 0.49 | 3,010.71 | 0.60 | 6,600.35 | 0.00 | 168,896.00 | 0.48 |
| CO ₂ Emission from fertilizer | 13,693.19 | 0.04 | 232.61 | 0.05 | 614.49 | 0.00 | 14,540.29 | 0.04 |
| NO ₂ Emission | 10,939.59 | 0.03 | 829.52 | 0.17 | 720.42 | 0.14 | 12,489.53 | 0.04 |
| Fuel Consumption | 5,481.87 | 0.02 | 27.35 | 0.01 | 87.80 | 0.00 | 5,597.02 | 0.02 |
| Peat Oxidation | 0.00 | 0.00 | 4,618.04 | 0.92 | 0.00 | 0.00 | 4,618.04 | 0.01 |
| Sink | | | | | | | | |
| Crop Sequestration | -150,515.55 | -0.47 | -2,853.76 | -0.57 | -6,256.26 | 0.00 | -159,625.6 | -0.45 |
| Conservation Sequestration | -458.81 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | -458.81 | 0.00 |
| Total | 38,425.23 | 0.12 | 5,864.47 | 1.16 | 1,766.80 | 0.00 | 46,056.5 | 0.13 |

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

| | tCO ₂ e | tCO ₂ e/tFFB |
|------------------------------|--------------------|-------------------------|
| Emission | | |
| POME | 86,601.88 | 0.25 |
| Fuel Consumption | 771.95 | 0.00 |
| Grid Electricity Utilization | 0.00 | 0.00 |
| Credit | | |
| Export of Grid Electricity | 0.00 | 0.00 |
| Sales of PKS | -11,973.13 | -0.03 |
| Sales of EFB | 0.00 | 0.00 |
| Total | 75,400.69 | 0.22 |

Summary of Kernel Crusher Emission and Credit (if applicable)

| Emissions | tCO ₂ e |
|--------------------------------|--------------------|
| PK from own mill | 0.00 |
| PK from other source | 0.00 |
| Fuel Consumptions | 0.00 |
| Total Crusher emissions | 0.00 |

*This mill has no kernel crusher operation.

| Palm Oil Mill Effluent (POME) Treatment: | |
|---|--------|
| Divert to Compost (%) | 0.00 |
| Divert to anaerobic diversion (%) | 100.00 |

| POME Diverted to Anaerobic Digestion: | |
|--|--------|
| Divert to anaerobic pond (%) | 100.00 |
| Divert to methane captured (flaring) (%) | 0.00 |
| Divert to methane captured (energy generation) (%) | 0.00 |

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

2020

| Emission per product | tCO ₂ e/tProduct |
|----------------------|-----------------------------|
| CPO | 1.28 |
| PKO | 1.28 |

| Extraction | % |
|------------|-------|
| OER | 20.95 |
| KER | 5.49 |

| Production | t/yr |
|--------------|------------|
| FFB Process | 353,365.33 |
| CPO Produced | 74,040 |
| PKO Produced | 19,410 |

| Land Use | Ha |
|-----------------------------|------------------|
| OP Planted Area | 19,746.38 |
| OP Planted on peat | 1,366.44 |
| Conservation (forested) | 49.58 |
| Conservation (non-forested) | 214.52 |
| Total | 21,376.92 |

Summary of Field Emission and Sink

| | Own Crop* | | Group | | 3 rd Party | | Total | |
|--|--------------------|--------------------------|--------------------|--------------------------|-----------------------|--------------------------|--------------------|--------------------------|
| | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB |
| Emission | | | | | | | | |
| Land Conversion | 162,253.86 | 0.49 | 254.88 | 0.62 | 9,730.85 | 0.00 | 172,239.59 | 0.49 |
| CO ₂ Emission from fertilizer | 10,756.57 | 0.03 | 22.08 | 0.05 | 1,054.12 | 0.00 | 11,832.77 | 0.03 |
| NO ₂ Emission | 10,007.01 | 0.03 | 180.91 | 0.44 | 765.79 | 1.87 | 10,953.71 | 0.03 |
| Fuel Consumption | 5,984.82 | 0.02 | 3.20 | 0.01 | 502.73 | 0.00 | 6,490.75 | 0.02 |
| Peat Oxidation | 0.00 | 0.00 | 1,186.48 | 2.89 | 0.00 | 0.00 | 1,186.48 | 0.00 |
| Sink | | | | | | | | |
| Crop Sequestration | -153,795.17 | -0.46 | -241.59 | -0.15 | -9,223.55 | 0.00 | -163,260.31 | -0.46 |
| Conservation Sequestration | -443.97 | -0.00 | 0.00 | 0.00 | -3.58 | 0.00 | -447.55 | 0.00 |
| Total | 34,763.12 | -0.10 | 1,405.95 | 3.43 | 2,826.36 | 0.00 | 38,995.44 | 0.11 |

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

| | tCO ₂ e | tCO ₂ e/tFFB |
|------------------------------|--------------------|-------------------------|
| Emission | | |
| POME | 96,119.67 | 0.27 |
| Fuel Consumption | 776.12 | 0.00 |
| Grid Electricity Utilization | 0.00 | 0.00 |

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

| Credit | | |
|----------------------------|----------------|-------------|
| Export of Grid Electricity | 0.00 | 0.00 |
| Sales of PKS | -16,231.56 | 0.05 |
| Sales of EFB | 0.00 | 0.00 |
| Total | -125.80 | 0.00 |

Summary of Kernel Crusher Emission and Credit (if applicable)

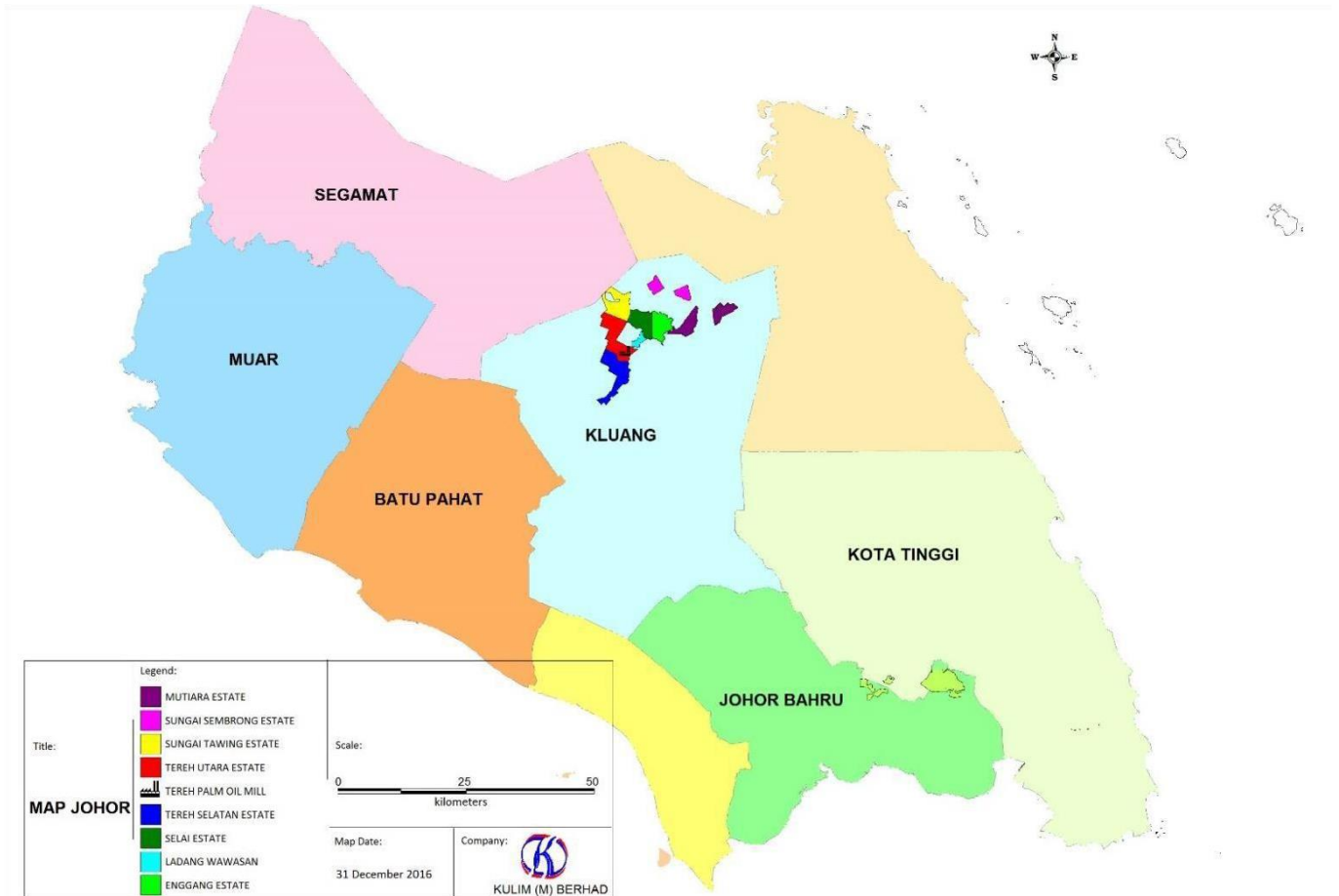
| Emissions | tCO₂e |
|--------------------------------|-------------------------|
| PK from own mill | 0.00 |
| PK from other source | 0.00 |
| Fuel Consumptions | 0.00 |
| Total Crusher emissions | 0.00 |

*This mill has no kernel crusher operation.

| Palm Oil Mill Effluent (POME) Treatment: | |
|---|--------|
| Divert to Compost (%) | 0.00 |
| Divert to anaerobic diversion (%) | 100.00 |

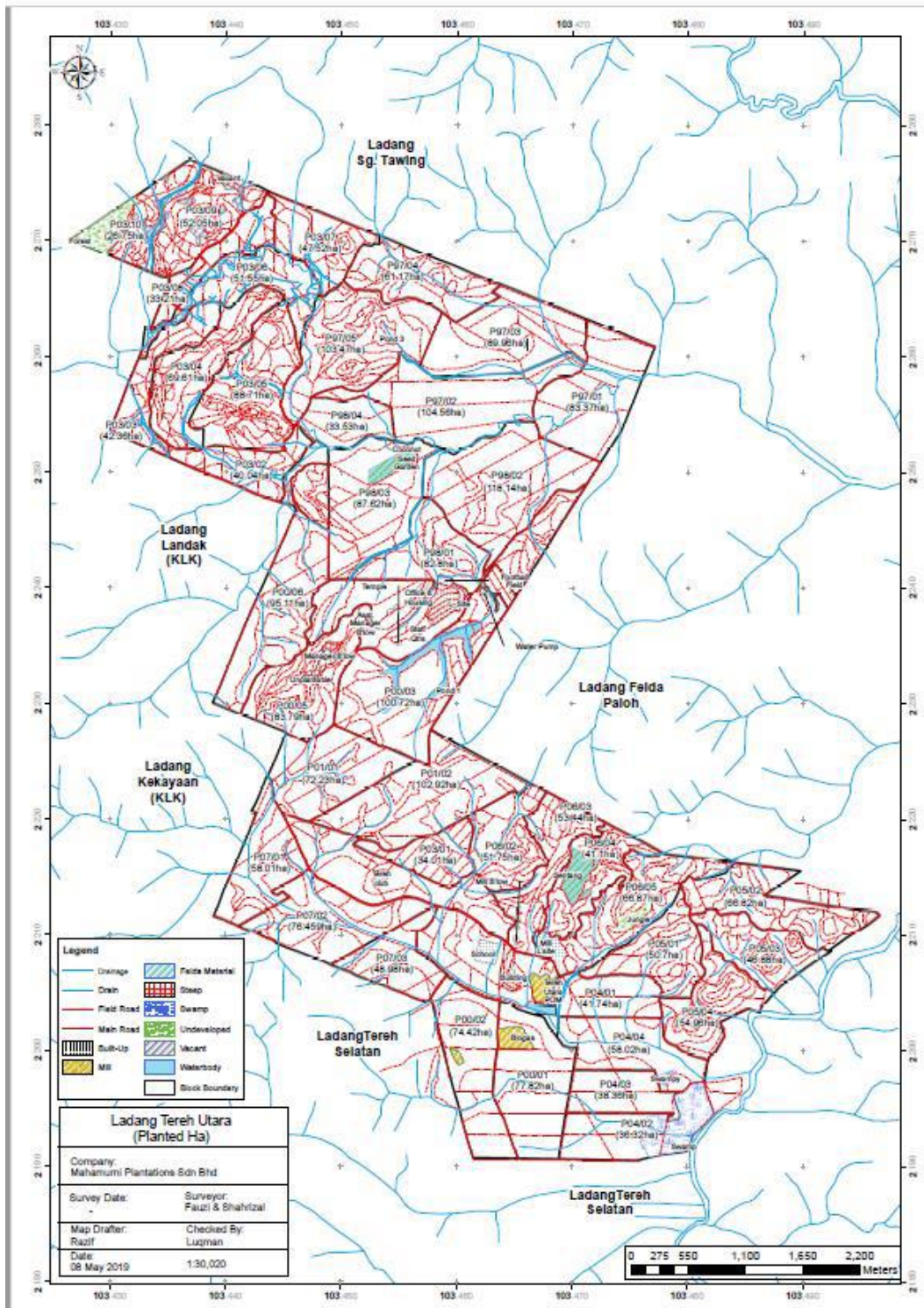
| POME Diverted to Anaerobic Digestion: | |
|--|--------|
| Divert to anaerobic pond (%) | 100.00 |
| Divert to methane captured (flaring) (%) | 0.00 |
| Divert to methane captured (energy generation) (%) | 0.00 |

Appendix C: Location Map of Certification Unit and Supply bases



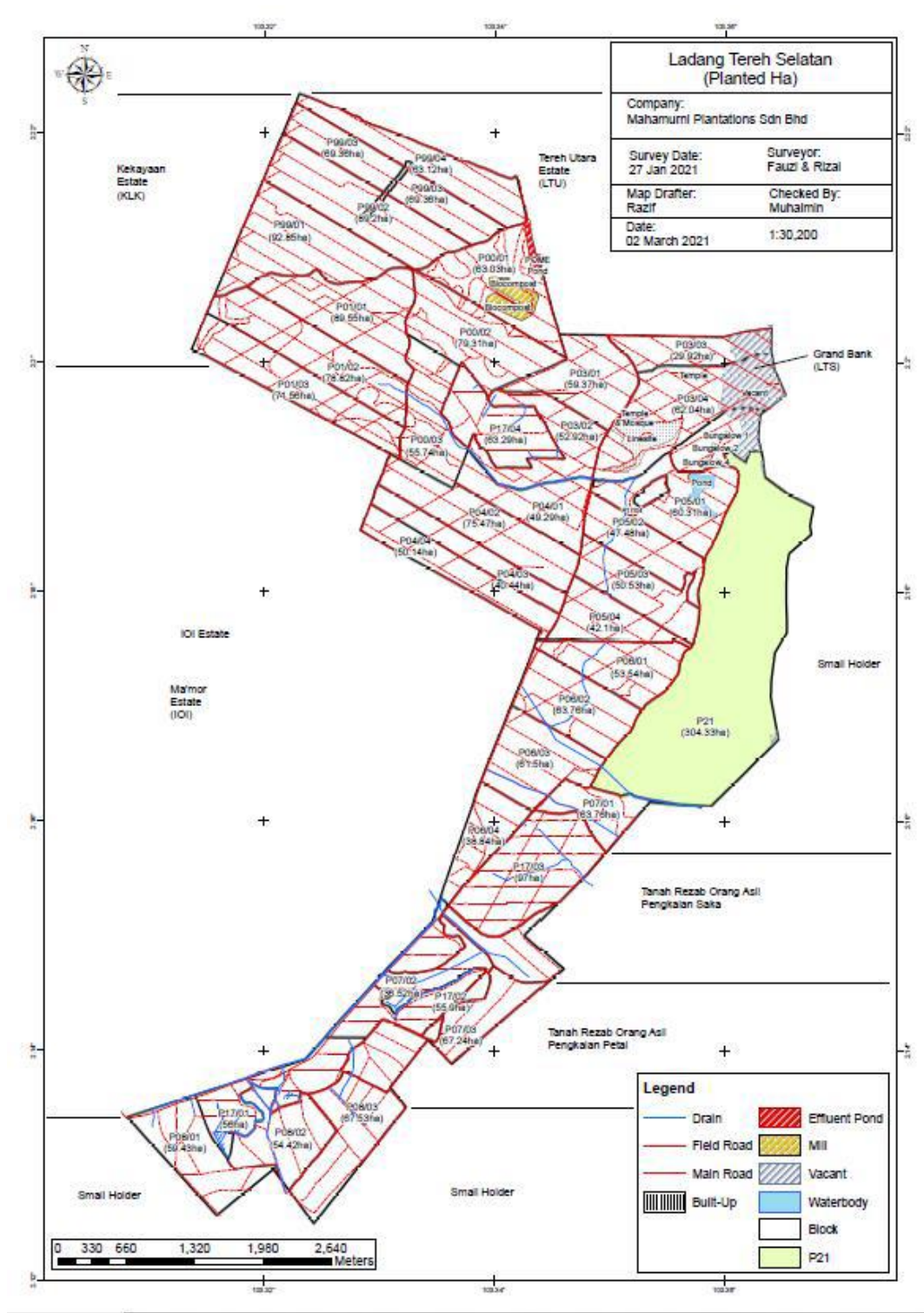
Appendix D: Estate Field Map

Tereh Utara Estate

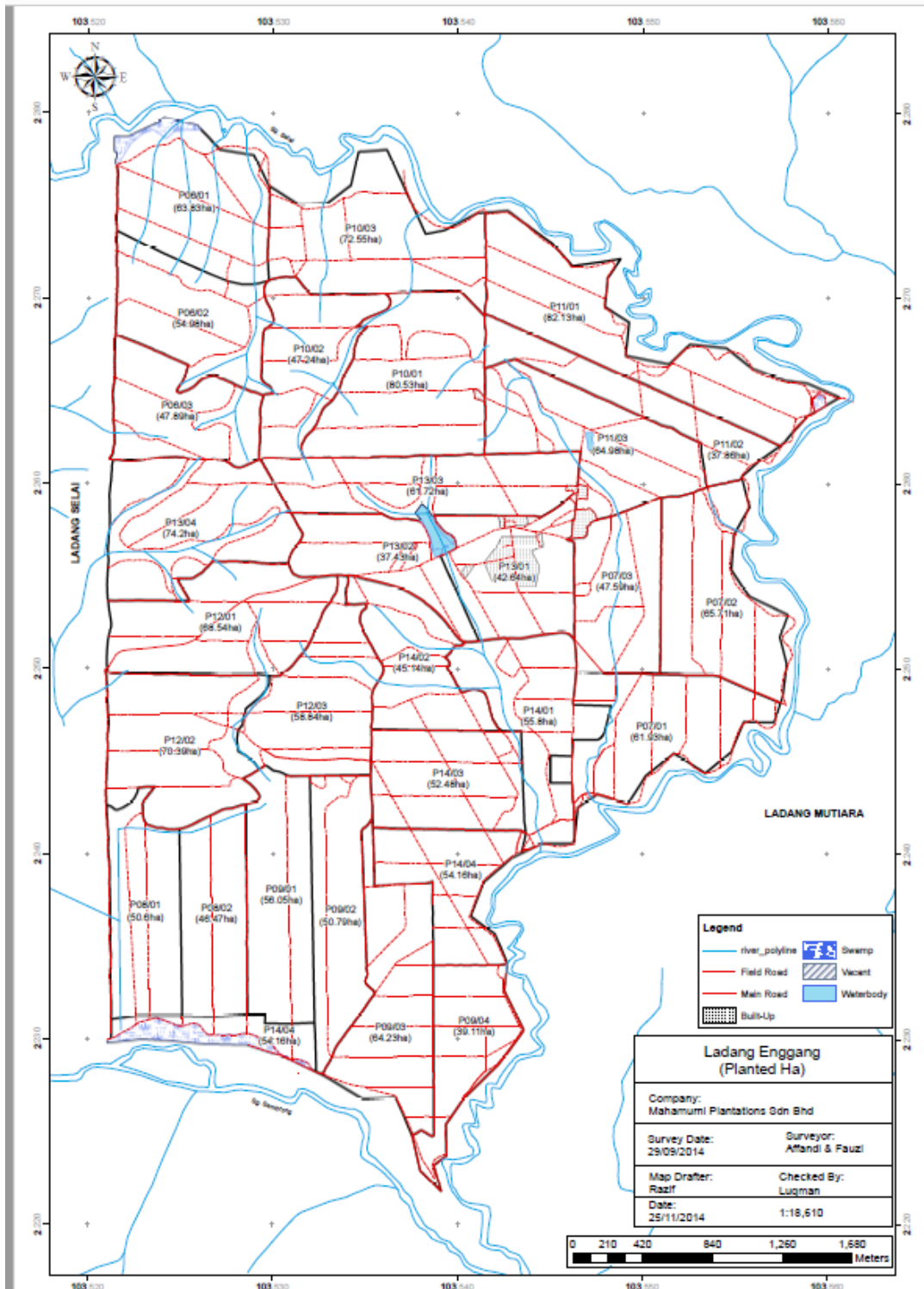


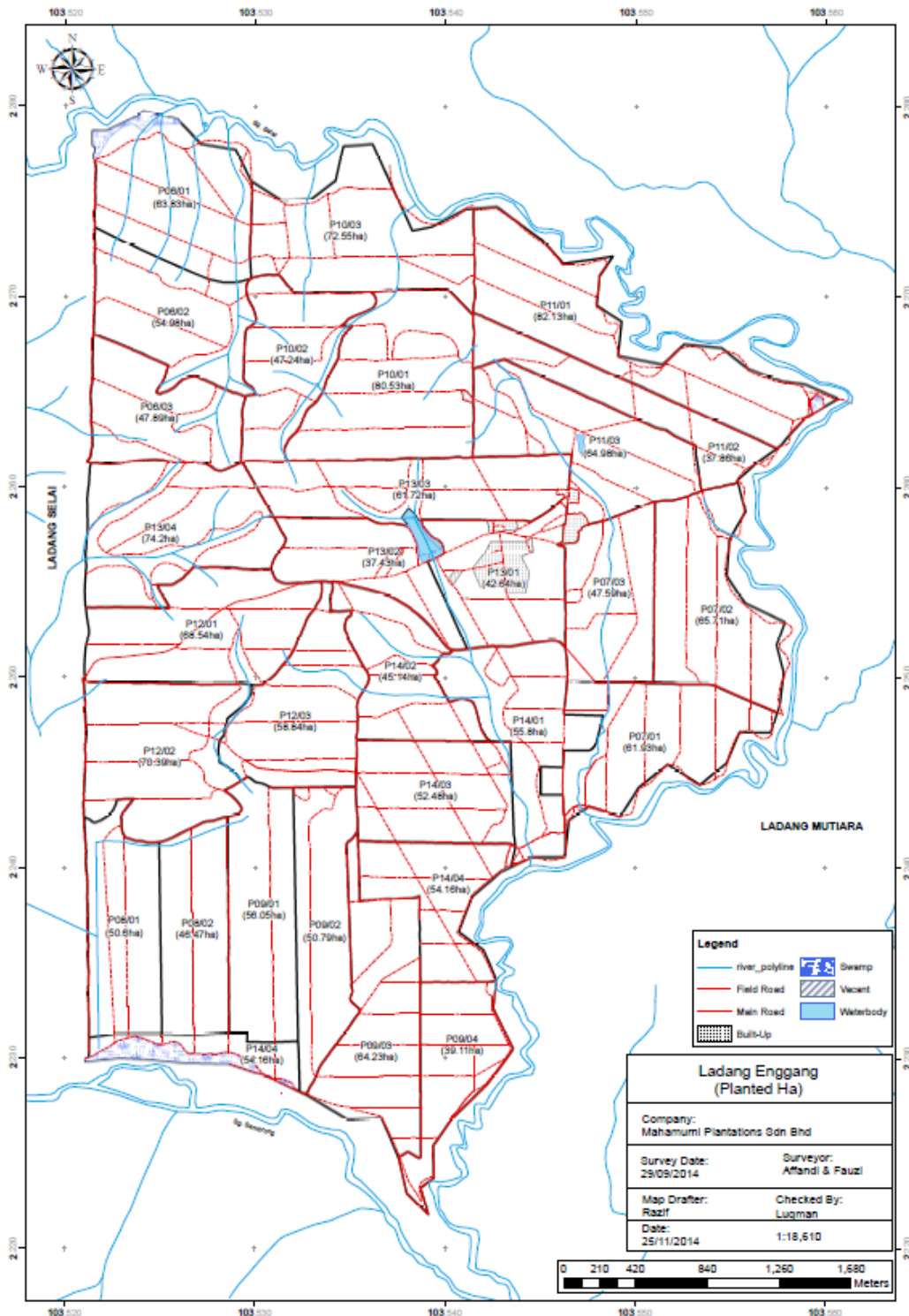
RSP0 P&C Public Summary Report
Revision 12 (Jun 2021)

Tereh Selatan Estate

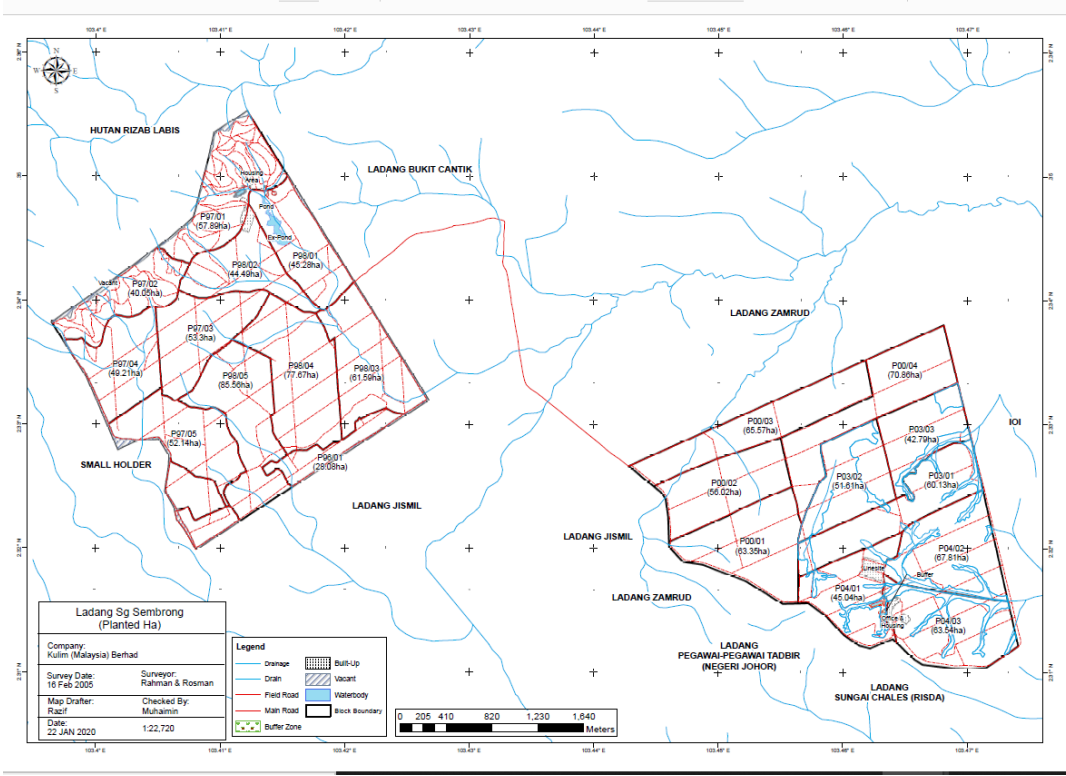
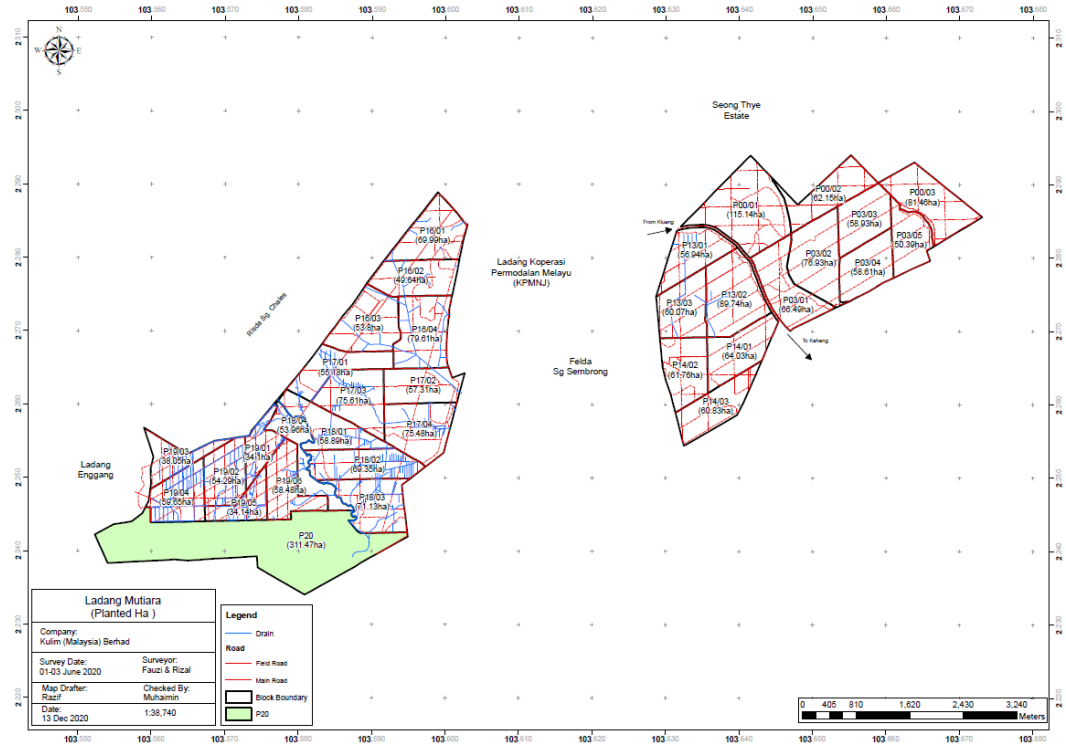


Selai Estate

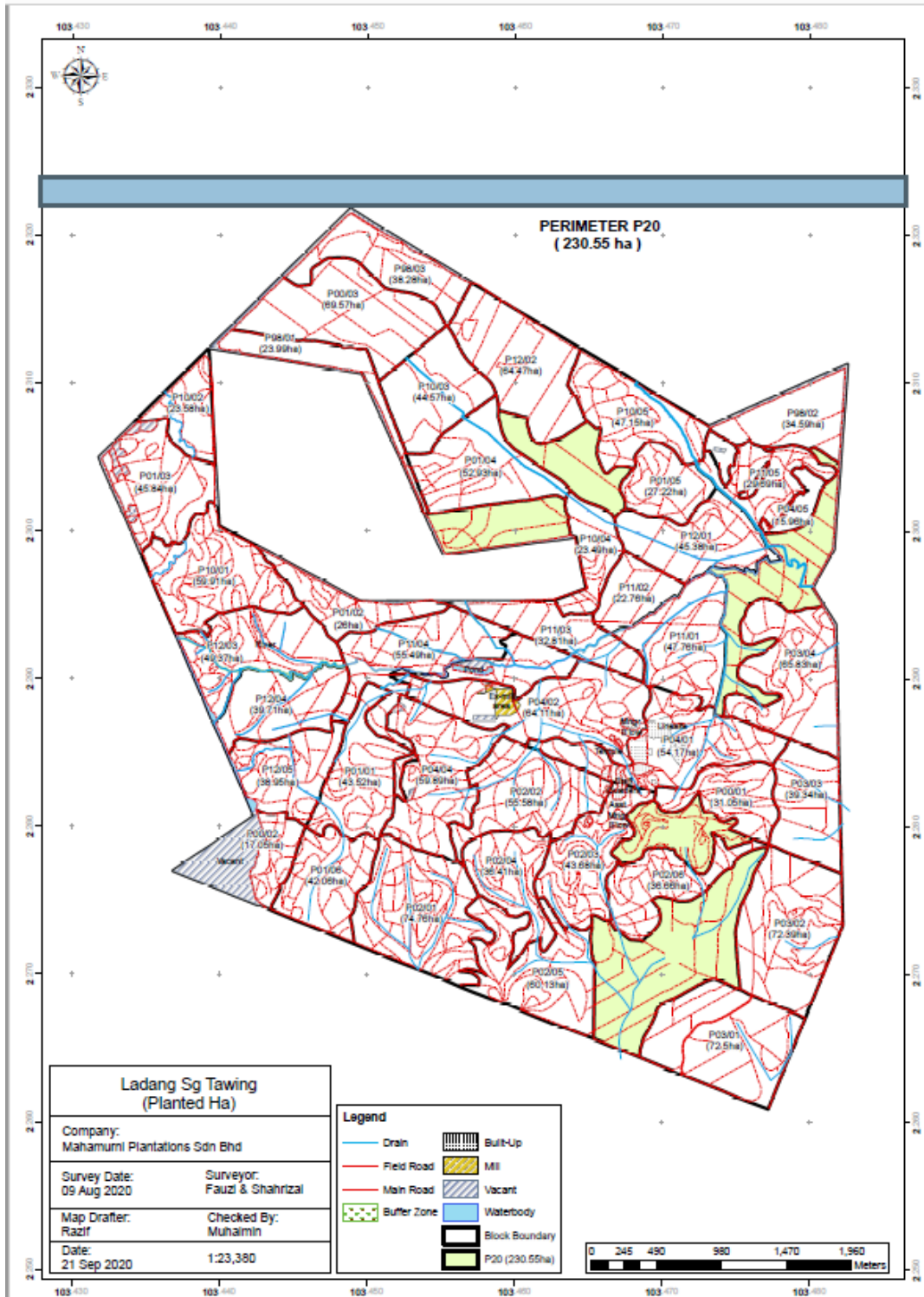




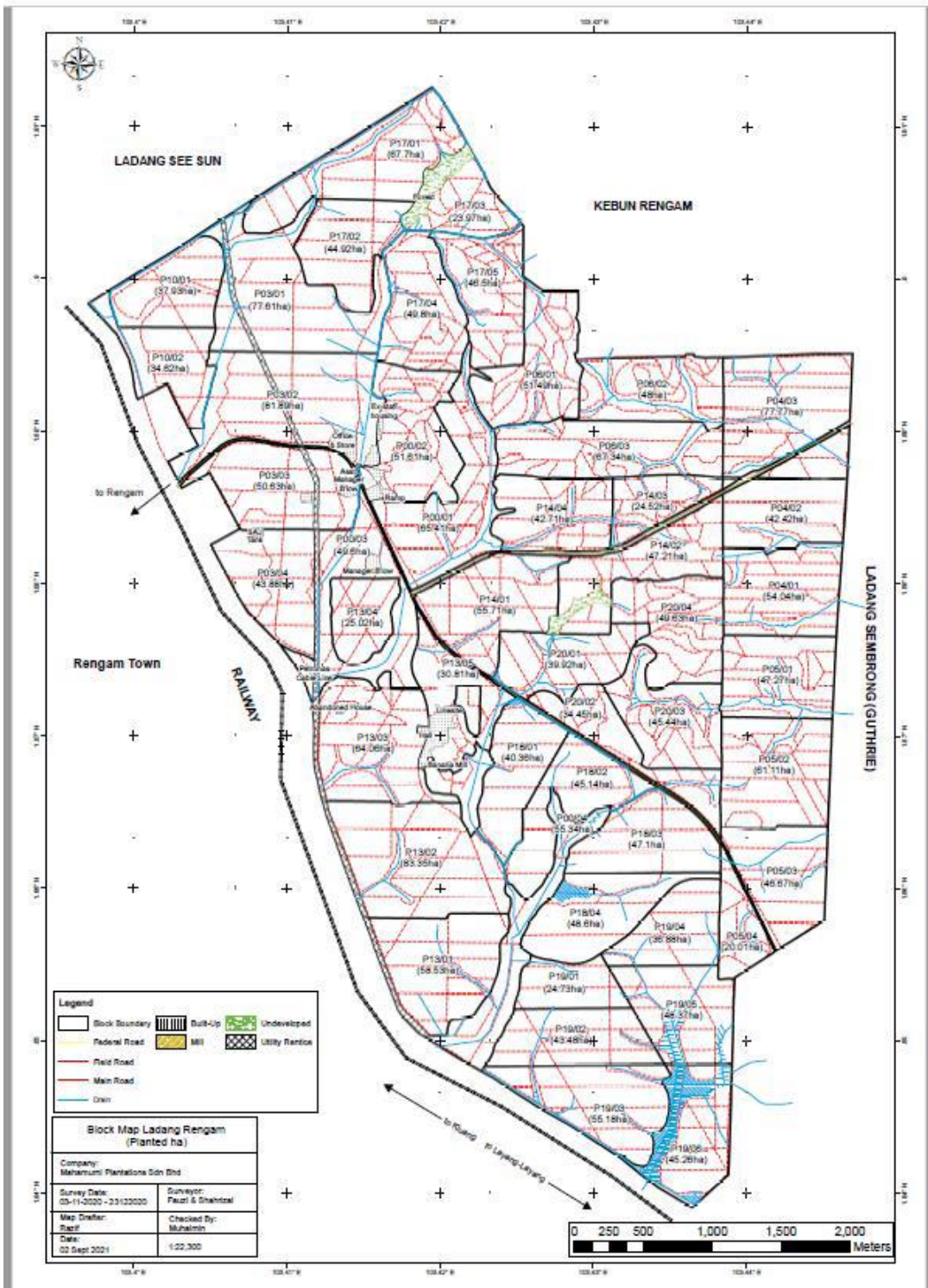
Mutiara Estate



Sg. Tawing Estate

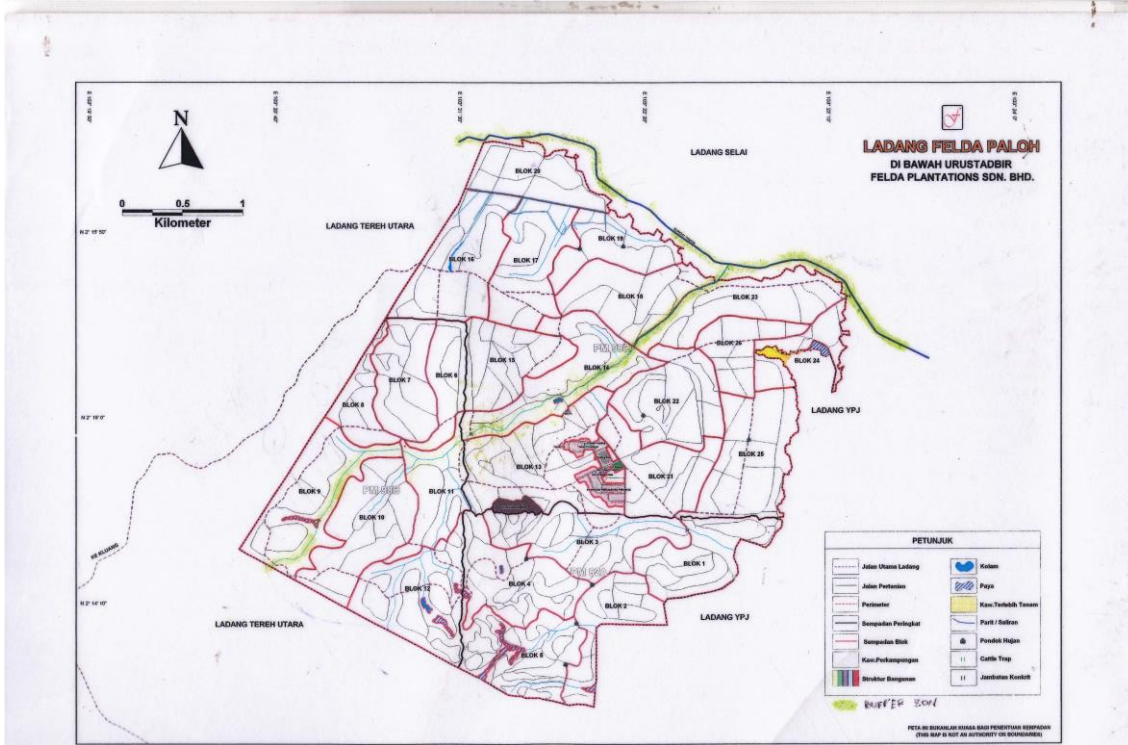


Rengam Estate

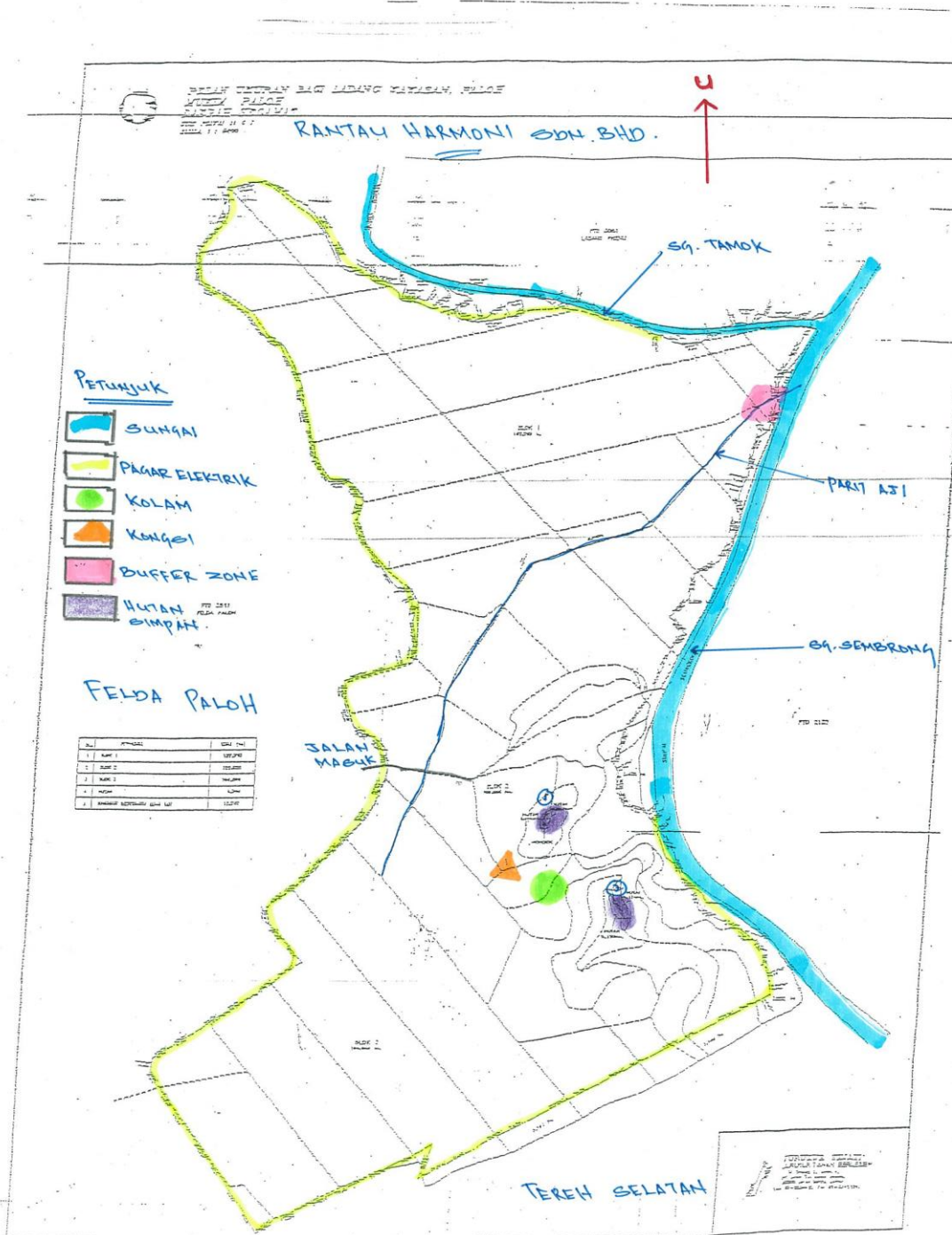


RSP0 P&C Public Summary Report
Revision 12 (Jun 2021)

FGV Paloh Estate



Wawasan Estate



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 |