

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (1_1)
- Recertification Assessment (Choose an item.)
- Extension of Scope

Johor Corporation
Client company Address: Level 16, Menara Komtar, Johor Bahru City Centre, 80000 Johor Bahru, Johor Darul Takzim, Malaysia
Certification Unit: Mahamurni Plantations Sdn Bhd - Pasir Panjang Palm Oil Mill
Location of Certification Unit: KM 30, Jalan Jemaluang, Kota Tinggi, 81900 Johor, Malaysia
Date of Final Report: 06/03/2023

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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, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Mahamurni Plantation Sdn Bhd - Pasir Panjang Palm Oil Mill		
Location / Address	KM 30, Jalan Jemaluang, Kota Tinggi, 81900 Johor, Malaysia		
Website	www.kulim.com.my		
Management Representative	Salasah Elias	E-mail	salasah@kulim.com.my
Telephone	07-8611611	Facsimile	07-8631084

2. Certification Information			
Certificate Number	RSPO 657192	Certificate Start Date	09/03/2022
Date of First Certification	09/03/2017	Certificate Expiry Date	08/03/2027
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	The objective of the assessment was to conduct an annual surveillance assessment of the existing certification to ensure the elements of the proposed scope of registration and the requirements of the management standard are effectively addressed by the organisation's management system.		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 1_1) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	Mill Capacity	60 mt/h
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 696199	MS 2530-3: 2013 Part 3: General Principles For Oil Palm Plantations And Organised Smallholders	BSI Services Malaysia Sdn Bhd	07/03/2024
MSPO 696200	MS 2530-4:2013 Part 4: General Principles For Palm Oils Mills	BSI Services Malaysia Sdn Bhd	07/03/2024
BVC-MSPO/SC-0030	MSPO Supply Chain Certification Standard, dated 1 October 2018	BSI Services Malaysia Sdn Bhd	10/03/2025
EU-ISCC-Cert-PL214-60960621	ISCC EU / ISCC PLUS	ASG CERT	13/06/2023
ISCC-Plus-Cert-DE119-60226096	ISCC PLUS	ASG CERT	13/06/2023
A148857	MS 1500 : 2009	JAKIM	15/02/2023

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Pasir Panjang POM	KM 30 Kota Tinggi/ KM 63 Mersing, Jalan Jemaluang, 81900, Kota Tinggi, Johor Darul Takzim.	02°01'04.85"N	103° 56' 54.87"E
Pasir Panjang Estate	KM 30 Kota Tinggi/ KM 63 Mersing, Jalan Jemaluang, 81900, Kota Tinggi, Johor Darul Takzim.	02°00'34.76"N	103° 57'15.93"E
Tunjuk Laut Estate	KM 30 Kota Tinggi/ KM 63 Mersing, Jalan Jemaluang, 81900, Kota Tinggi, Johor Darul Takzim.	01°57'41.69"N	103°59'09.52"E
Siang Estate	KM 3 Tg. Balau / 87 Johor Bahru, Jalan Ladang Siang – Tanjung Balau, 82200, Bandar Penawar, Johor Darul Takzim.	01°39'10.15"N	104°12'40.23"E
Bukit Kelompok Estate	KM 30 Kota Tinggi/ KM 63 Mersing, Jalan Jemaluang, 81900, Kota Tinggi, Johor Darul Takzim.	02°00'24.31"N	103°59'54.39"E
Pasir Logok Estate	KM 30 Kota Tinggi/ KM 63 Mersing, Jalan Jemaluang, 81900, Kota Tinggi, Johor Darul Takzim.	02°01'53.38"N	104°02'20.35"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)

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Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Pasir Panjang Estate	3,372.08	424.56	216.99	4,013.63	84.02
Tunjuk Laut Estate	2,657.35*	22.70*	187.75*	2,867.80	92.66
Siang Estate	3,204.69	71.11	167.30	3,443.10	93.08
Bukit Kelompok Estate	2,437.75	41.19	134.86	2,613.80	93.26
Pasir Logok Estate	1,992.68	17.40	87.13	2,097.21	95.02
Total	13,664.55	576.96	794.03	15,035.54	90.88

Note:

- Resurvey on Total Planted HA and HCV at Tunjuk Laut Estate by Agronomist Department on 23/01/2022

6. Plantings & Cycle

Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Pasir Panjang Estate	251.13	3,120.95	0.00	0.00	3,120.95	251.13
Tunjuk Laut Estate	0.00	2,192.06	465.29	0.00	2,657.35	0.00
Siang Estate	0.00	1,492.06	1,712.63	0.00	3,204.69	0.00
Bukit Kelompok Estate	0.00	1,642.47	795.28	0.00	2,437.75	0.00
Pasir Logok Estate	140.91	987.82	863.95	0.00	1,851.77	140.91
Total (ha)	392.04	9,435.36	3837.15	0.00	13,272.51	392.04

Note:

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

Estate / Smallholders	Tonnage (MT) / year			Forecast (Mar 2023 – Feb 2024)
	Estimated last year (Mar 2022 – Feb 2023)	Actual (Jan 2022 – Nov 2022)		
		Previous license period (Jan 2022 – Mar 2022)	Current license period (Apr 2022 – Nov 2022)	
Pasir Panjang Estate	62,123.00	7,701.28	39,023.63	67,156.00
Tunjuk Laut Estate	63,425.00	10,537.14	42,814.62	67,651.00
Siang Estate	80,831.00	14,647.70	47,302.29	82,702.00
Bukit Kelompok Estate	63,370.00	10,561.66	33,570.75	61,018.00
Pasir Logok Estate	50,630.00	8,325.20	31,380.87	52,641.00
Total	320,379.00	245,865.14		331,168.00

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Note: The forecast yield was verified and confirmed based on estates recruitment planning which will reduce harvester to area ratio and increase harvesting rounding, 2022 rain fall pattern and consideration of prime age of the OP.

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

Estate / Smallholders	Tonnage (MT) / year			Forecast (Mar 2023 – Feb 2024)
	Estimated last year (Mar 2022 – Feb 2023)	Actual (Jan 2022 – Nov 2022)		
		Previous license period (Jan 2022 – Mar 2022)	Current license period (Apr 2022 – Nov 2022)	
Sungai Papan Estate		14,340.18	17,431.05	
Total		31,771.23		

Note: Sungai Papan Estate was one of the Sindora POM Supply Bases. Crop diversion to Pasir Panjang POM in case shut down from the Sindora POM and also on monsoon season.

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

Out growers / smallholders	Tonnage (MT) / year			Forecast (Mar 2023 – Feb 2024)
	Estimated last year (Mar 2022 – Feb 2023)	Actual (Jan 2022 – Nov 2022)		
		Previous license period (Jan 2022 – Mar 2022)	Current license period (Apr 2022 – Nov 2022)	
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	Jan 2022	23,338.14	0.00	23,338.14
2	Feb 2022	17,825.71	0.00	17,825.71
3	Mac 2022	24,949.31	0.00	24,949.31
4	Apr 2022	24,711.01	0.00	24,711.01
5	May 2022	25,083.18	0.00	25,083.18
6	June 2022	24,776.05	0.00	24,776.05
7	July 2022	26,444.84	0.00	26,444.84
8	Aug 2022	25,675.40	0.00	25,675.40
9	Sept 2022	27,978.71	0.00	27,978.71
10	Oct 2022	28,570.48	0.00	28,570.48

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11	Nov 2022	28,283.54	0.00	28,283.54
TOTAL		277,636.37	0.00	277,636.37

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Mar 22 – Feb 23)	Actual (Jan 2022 – Nov 2022)		Forecast (Mar 2023 – Feb 2024)
	<i>Previous license period (Jan 2022 – Mar 2022)</i>	<i>Current license period (Apr 2022 – Nov 2022)</i>	
FFB	FFB		FFB
320,379.00 mt	66,113.16 mt	211,523.21 mt	331,168.00 mt
	TOTAL	277,636.37 mt	
CPO (OER: 22.80%)	CPO (OER: 20.71%)		CPO (OER: 22.80%)
73,046.00 mt	14,136.75 mt	43,367.20 mt	75,506.00 mt
	TOTAL	57,504.02 mt	
PK (KER: 5.5%)	PK (KER: 5.24%)		PK (KER: 5.50%)
17,621.00 mt	3,612.94 mt	10,932.92 mt	18,214.00 mt
	TOTAL	14,545.86 mt	

Note: The forecast OER was verified and confirmed based on historical data of the mill

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month – Year	Certified CPO (MT)	Certified PK (MT)
1	Jan 2022	4,949.15	1,289.34
2	Feb 2022	3,732.45	969.82
3	Mac 2022	5,455.15	1,353.78
4	Apr 2022	5,367.15	1,315.17
5	May 2022	5,337.66	1,288.60
6	June 2022	5,248.77	1,261.97
7	July 2022	5,500.79	1,366.44
8	Aug 2022	5,245.85	1,317.00
9	Sept 2022	5,505.70	1,427.52
10	Oct 2022	5,722.69	1,500.31
11	Nov 2022	5,438.66	1,455.91
TOTAL		57,504.02	14,545.86

11. Summary of Actual Volume sold					
Current License period (Apr 2022 – Nov 2022)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	36,606.61	0	0	1,011.55	37,618.16
PK (MT)	9,471.03	0	0	0	9,471.03
Credits	0	0	0	0	0
Previous License period (Jan 2022 – Mar 2022)					
CPO (MT)	11,380.02	1,699.40	0	131.93	13,211.35
PK (MT)	3,547.68	0	0	0	3,547.68
Credits	0	0	0	0	0

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)	Palmtrace Trading License Number	Certified PK Sold (mt)
1	Buyer AA	TR-6311621b-85d2 TR-10f20a86-19f7 TR-2d68729a-e317 TR-4745720d-c44d TR-3bf8da28-739a TR-e8999d1c-1007 TR-b64a1975-dbdd TR-d21b4355-1c16 TR-431dc957-8935 TR-3186b8f8-9bbc TR-11689e9a-0323 TR-98266f0d-59dd TR-dcd6fbc8-2865 TR-b5de3d5a-4efc TR-253afce3-07b1 TR-edf404fe-1722 TR-e1e19b82-0c73 TR-c3f3fcf8-a819 TR-c5fd8dcd-23b4 TR-d25dc789-0dcf TR-e7d2bc33-cd42 TR-5bdcb6af-00ba TR-9ddc44a8-33b2 TR-be0aa0f8-bd03	29,508.55	TR-f4940de7-32bb TR-2a02ccb9-8be9 TR-cc6de8f2-2322 TR-1ee2a670-c750 TR-18adf218-0371 TR-9920f7d2-2273 TR-dd4b8032-be6a TR-148ca30b-00ac TR-fcdb6f60-5886 TR-936a0ae8-9c3e TR-62509aff-0925 TR-73d6a4d3-f1d6 TR-edd0ff18-0f65 TR-6db50d31-39dc TR-2628612a-6990 TR-bfc47e9c-5fa7 TR-275ae39f-ec5f TR-262f34be-ad73 TR-22cd6833-5fcd	1,954.66

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		TR-e8143b2e-f14e			
2	Buyer AB	TR-721554d9-a198 TR-6dfa7f7f-da3d TR-e787d4fc-bcfd TR-8ef1986b-3de0 TR-f3a94a11-592b TR-04f8e9a1-dd34 TR-1c35fef3-a71f TR-5b67a9f5-919c TR-5191d915-3814 TR-1ccf474f-1b07 TR-8e9a2f1f-fc68 TR-5a500d32-d833 TR-763f835e-e5b2 TR-ddf70d00-ed95 TR-13def8d3-18a1 TR-50a1098d-f4ce TR-7588f379-189d TR-45525c6b-fa3b TR-db3a805f-ac62 TR-c0d8927c-aba0 TR-9b777200-b6f9 TR-7c827ebf-c02e TR-70e130fc-7a01 TR-6ee6dc11-b69b TR-3722da2c-3f7f TR-f68dc587-765d TR-58bbdef0-7db1 TR-38a48fda-bc20	13,368.55	TR-86634dcb-3ade TR-0d3788bd-7446	160.27
3	Buyer AC	TR-eb0a853a-c389 TR-5a07a916-2b19 TR-96c14972-257a TR-fd8063cf-ba90 TR-15831976-f507 TR-4e85b425-4eb2 TR-26dfc229-30af TR-75df9abf-2984 TR-5a930577-0c3d TR-fac97bcc-c539 TR-a183e1a0-d76f TR-62bb7cd2-1ee5 TR-35efd605-630f TR-658effc1-8958 TR-598e55d7-76e6 TR-6699b70a-8c10	3,179.61	TR-69daff65-0577 TR-2ae3cd95-d61c TR-1d4946b3-286f TR-6532c695-8f8e TR-f1e446c6-963a TR-7198e177-f0b8 TR-9fff837f-b2ea TR-140c3a53-d0cd TR-b4d636a0-6252 TR-8d6047a4-dc06 TR-48a0a8b0-8a93 TR-93430f23-e634 TR-4f99c195-0aba TR-687139cc-1cac TR-c31a21e2-8b3a TR-bf296579-81cd	7,007.3

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		TR-32166f81-4399 TR-eed38d13-07f4		TR-47107be5-1807	
4	Buyer AD	TR-71a7bc10-a496 TR-3901a06d-2845 TR-c0721b2b-feae TR-45e061ea-7d8e TR-60ca7e7a-78d3	1,198.51	TR-ccf2350c-cd86 TR-ee4bff71-2941 TR-86d98112-3827 TR-50fed252-a836 TR-93519380-0af5 TR-e286f0e1-566a TR-c83b6e4f-9a93 TR-ba33e200-68cb TR-ae5298b8-b358 TR-2dd5e214-cf68 TR-5242b6ea-545d TR-83e5aab3-ab0b TR-f8a6c46c-f666 TR-5a3f76ab-3567 TR-9963592d-ffe4 TR-4bddc8ac-aa0a TR-0be8fcf9-1f19	1,723.72
5	Buyer AE	TR-6cac3e51-db9b	285.78	TR-1d8284b0-524e TR-e30fbd76-0f0b TR-77c93774-e38e	250.71
6	Buyer AF	TR-0cd81601-6fce	70.49	TR-172f0218-8ad9 TR-876db5fc-3430 TR-27a67738-bcd3 TR-82434c8a-dd5b TR-a1cf5413-7ad0 TR-7e1dc44e-579d TR-7d98dbb7-b610 TR-b6004603-a2d6 TR-9d241b00-398e TR-332ce1e9-b775	1,922.05
7	Buyer AG	TR-a64d030b-7a3b TR-0e6e76a7-036d	375.14	-	-
TOTAL			47,986.63		13,018.71

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	Buyer AI	ISCC	1,699.40	NA
TOTAL			1,699.40	NA

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11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	Buyer AJ	1,143.48	0
TOTAL		1,143.48	0

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
NA	NA	NA	NA
TOTAL			

12. Independent Smallholders Certified Tonnage (MT) / 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			NA			NA			NA
IS-CSPO	NA	NA		NA	NA		NA	NA	
IS-CSPKO	NA	NA		NA	NA		NA	NA	
IS-CSPKE	NA	NA		NA	NA		NA	NA	
CSPK	NA	NA		NA	NA		NA	NA	

12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
NA	NA	NA	NA	NA	NA	NA
TOTAL		NA	NA	NA	NA	NA

Note: 1 mt = 1 credit

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

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Physical	N/A	N/A	N/A				
Previous License period (not applicable)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				

13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit							
No.	Buyers Name	PalmTrace Trading License Number	FFB Sold (MT)	Certified CPO Sold (MT/credit)	Certified PK Sold (MT/credit)	Certified PKO Sold (MT/credit)	Certified PKE Sold (MT/credit)
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A	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.
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Representative: Dr. Chaiyaporn Seekao (Chaiyaporn.Seekao@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 **04-08/12/2022**. The audit programme is included as Section 2.3.

The approach to the audit was to treat the mill and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety. The 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 Critical NC close out on-site assessment was conducted on **04/02/2023**. 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.

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

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

For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer reviewer prior to certification decision by BSI.

For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

The following table would be used to identify the locations to be audited each year in the 5 year cycle

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
Pasir Panjang POM	√	√	√	√	√
Pasir Panjang Estate	√	√	-	√	√
Tunjuk Laut Estate	-	-	√	√	√
Siang Estate	-	√	√	-	√
Bukit Kelompok Estate	√	√	√	√	-
Pasir Logok Estate	-	√	√	√	√

*Note: 4 estates has been sampled in the ASA1_1 audit to comply with RSPO certification systems requirement.

Tentative Date of Next Visit: November 13, 2023 - November 17, 2023

Total Number of Mandays: 15 mandays

2.2 BSI Assessment Team

Name	Role	Competency
Nor Halis Abu Zar (NHA)	Team Leader	<p>Education: Bachelor of Science, Plantation Technology and Management, graduated from UiTM in 2012 and Diploma In Plantation and Industry Management from UiTM in 2009.</p> <p>Work Experience: He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day-to-day plantation operations. In his career at Kulim Plantation. He had accumulated more than 6 years of sustainability implementation experience. He is a qualified Lead Auditor for MS2530:2013 and RSPO Auditor for ENV and OSH and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.</p> <p>Training attended: He has completed RSPO P&C Lead Auditor Course in Oct 2020, Refresher RSPO P&C Lead Auditor Course in May 2022, RSPO ISH Standard 2019 in</p>

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		<p>December 2021, RSPO SCC 2020 in September 2022, QMS 9001:2015 Lead Auditor Course in April 2019, OSH 45001:2018 Lead Auditor Course in June 2021, IMS (ISO 9001:2015 & ISO 14001:2015) Lead Auditor Course, HCV & HCS Training in August 2022, MSPO 2530:2013 Lead Auditor Course in February 2019, , MSPO SCCS Auditor in February 2019 and also trained in SMETA Requirement Training on May 2021</p> <p>Aspect covered in this audit:</p> <p>During this assessment, he assessed on the aspects of Economic management plan, mill best practices, estate best practices, natural and biodiversity conservation, Waste management, GHG, HCV.</p> <p>Language proficiency:</p> <p>Bahasa Malaysia and English.</p>
<p>Vijay Kanna Pakirisamy (VKP)</p>	<p>Team Member</p>	<p>Education:</p> <p>Bachelor’s Degree in Agribusiness Science Management with Honours from University Utara Malaysia in 2010.</p> <p>Work Experience:</p> <p>He gained his working exposure in the plantation sector, serving as an Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad prior to joining BSI as a Client Manager.</p> <p>Training attended:</p> <p>He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in November 2019, Endorsed RSPO P&C Lead Auditor Course in October 2019, Endorsed RSPO SCCS Lead Auditor Course in August 2020, Endorsed MSPO Lead Auditor Course in November 2019 and attended SMETA Requirements Training in April 2021.</p> <p>Aspect covered in this audit:</p> <p>During this assessment, he assessed on the aspects of Occupational, Health & Safety, Estate Best Practises and supply chain requirements.</p> <p>Language proficiency:</p> <p>He is fluent in English, Bahasa Malaysia, Tamil languages.</p>
<p>Rahayu Zulkifli (RZ)</p>	<p>Team Member</p>	<p>Education:</p> <p>Law Degree from John Moores University, Liverpool, United Kingdom</p> <p>Work Experience:</p> <p>She was a practicing lawyer before she joined several public listed companies as Head of Legal Department. In 2003 she joined an environmental NGO as a turtle conservationist, and in 2014 joined RSPO as Dispute Settlement Facility Manager. Rahayu is now a freelance auditor specializing in social aspects of the RSPO and MSPO standards, with audit experiences in Malaysia, Indonesia and Ghana.</p> <p>Training attended:</p> <p>Rahayu successfully attended the RSPO-endorsed Lead Auditor course in 2014, ISO 14001 Lead Auditor course in 2016, the MSPO Awareness Training in 2016, and RSPO-endorsed Lead Auditor Refresher course in 2018. Additionally, Rahayu also assists in HCV assessments (in particular HCV 5 &</p>

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		6), as well as carry out Social Impact Assessments. Rahayu is also a trained and certified Mediator. Aspect covered in this audit: During this assessment, she assessed on the aspects of legal, social and stakeholder engagement requirements. Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English Language.
	Peer Review	Nil

Accompanying Persons:

Name	Role
N/A	N/A

2.3 Assessment Plan

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

Date	Time	Subjects	NHA	RHZ	VKP
Saturday 03/12/2022	-	Audit Team Travel from Kuala Lumpur to Johor Bahru	√	√	√
Sunday, 04/12/2022 Bkt Kelompok Estate	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 	√	√	√
	09.00 – 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√
	12.30 – 13.30	Lunch	√	√	√
	13.30 – 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.)	√	√	√

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Date	Time	Subjects	NHA	RHZ	VKP
	16.30 – 17.00	Interim Closing briefing.	√	√	√
Monday 05/12/2022 Pasir Logok Estate	08.30 – 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√
	12.30 – 13.30	Lunch	√	√	√
	13.30 – 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	Interim Closing briefing.	√	√	√
Tuesday 06/12/2022 Pasir Panjang POM	08.30 – 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.	√	√	√
	10.00 – 12.00	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.	√	√	√

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Date	Time	Subjects	NHA	RHZ	VKP
	16.30 – 17.00	Interim Closing briefing.	√	√	√
Wednesday 07/12/2022 Siang Estate	08.30 – 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√
	12.30 – 13.30	Lunch	√	√	√
	13.30 – 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	Interim Closing briefing.	√	√	√
Thursday 08/12/2022 Pasir Panjang Estate	08.30 – 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√
	12.30 – 13.30	Lunch	√	√	√
	13.30 – 16.00	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.)	√	√	√
	16.00 – 17.00	Audit Team Discussion and Closing Meeting	√	√	√
Friday 09/12/2022	-	Audit Team travel back to Kuala Lumpur	√	√	√

Major NC Close Out Audit Plan

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Date	Time	Subjects	NHA
Tuesday 07/02/2023	-	Auditor Travelling	√
Wednesday 08/02/2023 08.30 – 11.30 Siang Estate	08.30 – 09.00	Opening Meeting: Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan	√
	09.00 – 11.00	<ul style="list-style-type: none"> • Verification on previous Major NC: <ol style="list-style-type: none"> 1. 2286196-202212-M1 • Site observation, workers interview (individual and group session) if necessary • Document review – implemented evidence 	√
	11.00 – 11.30	Closing Meeting	√
	11.30 – 13.30	Auditor travelling	√

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? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	Yes, all the estates and mills certified within 5 years after obtaining RSPO membership. Only Indonesian units, PT RAJ & PT TPR have not been certified yet and is proposed to be certified in 2025. Application to revise TBP has been approved by RSPO Secretariat on 20/04/2022	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. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	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?	Application to revise TBP has been approved by RSPO Secretariat on 20/04/2022 This is consistent with the RSPO ACOP reporting. The link provided below: https://rspo.org/members/1-0080-09-000-00/	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. However, the programme has been stopped	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.	As of to date there are no new plantings that replace primary forest under Johor Corporation.	Complied

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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 at Johor Corporation estates.	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	No land conflict under all certification units as verified in the RSPO RaCP Tracker, as checked on December 2022.	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	No labour dispute within all certification units.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance within all certification units.	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.	RSPO internal audit assessment for all uncertified units been conducted and the report had been submitted to all unit for improvement plan. The report indicated no systematic failures to proceed with implementation that should be raised as major Nonconformities. Internal audit has been conducted on 23-28/11/2020	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No. There is no any Critical (Major) non-compliance raised during the last internal audit.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	None noted. No stakeholder comments or complaints received	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.	Not Applicable

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Approved Time Bound Plan

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Certification Status (Certified / Not certified)	Plan Year for Certification	Actual Certification Year	Date of Last TBP Verified and Approved by CB	REVISION OF THE TBP <i>(Only applicable when revision is made)</i>			
							Any revision from the last approved TBP? (Yes / No)	New Proposed Year for Certification	Justification of changes for each UoC	Date of approval from RSPO
Sedenak Palm Oil Mill	Malaysia	Sedenak Palm Oil Mill	Certified		2009					
	Malaysia	Sedenak Estate	Certified		2009					
	Malaysia	Kuala Kabong Estate	Certified		2009					
Sindora Palm Oil Mill	Malaysia	Sindora Palm Oil Mill	Certified		2009					
	Malaysia	Sindora Estate	Certified		2009					
	Malaysia	Sungai Papan Estate	Certified		2009					
	Malaysia	REM Estate	Certified		2009					
	Malaysia	Basir Ismail Estate	Certified		2009					
Tereh Palm Oil Mill	Malaysia	Tereh Palm Oil Mill	Certified		2009					
	Malaysia	Tereh Utara Estate	Certified		2009					

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	Malaysia	Tereh Selatan Estate	Certified		2009					
	Malaysia	Selai Estate	Certified		2009					
	Malaysia	Sg Tawing Estate	Certified		2009					
	Malaysia	Rengam Estate	Certified		2009					
	Malaysia	Mutiara Estate	Certified		2009					
	Malaysia	Felda Paloh Estate	Certified		2011					
	Malaysia	Wawasan Estate	Certified		2011					
Palong Cocoa Palm Oil Mill	Malaysia	Palong Cocoa Palm Oil Mill	Certified		2011					
	Malaysia	Palong Estate	Certified		2011					
	Malaysia	Mungka Estate	Certified		2011					
	Malaysia	UMAC Estate	Certified		2011					
	Malaysia	Labis Bahru Estate	Certified		2011					
Pasir Panjang Palm Oil Mill	Malaysia	Pasir Panjang Palm Oil Mill	Certified		2017					
	Malaysia	Pasir Panjang Estate	Certified		2017					
	Malaysia	Tunjuk Laut Estate	Certified		2017					

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	Malaysia	Siang Estate	Certified		2017					
	Malaysia	Bukit Kelompok Estate	Certified		2017					
	Malaysia	Pasir Logok Estate	Certified		2017					
Bukit Layang Estate	Malaysia	Bukit Layang Estate	Certified		2020					
SUMSEL	Indonesia	PT RAJ	Not Certified		2025				<p>Justification to revise the TBP on certification completion by 2025 as per following:</p> <ol style="list-style-type: none"> 1. The estates, PT Rambang Agro Jaya (PT RAJ) and PT Temperai Palm Resources (PT TPR) were acquired in June 2016 but were put under rehabilitation decision for three (3) years from June 2016 – June 2019. 2. Management decision for certification planning program and budget was approved in April 2019 and progress of 	

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									<p>appointing the Consultant completed in December 2019 (ref. Perjanjian Jasa Consultansi). Hence our timeline for the certification program is set to start from 2020.</p> <p>3. Due to continuous MCO in 2020 and 2021, we managed to only complete the Baseline Analysis for ISPO and RSPO with the GAP Action Plan summarized by the Consultant. We are planning to continue the project this year but revival of the progress is currently having few major issues that still due as deliberated in our slides.</p> <p>4. The statement TBP in RSPO Public Summary was not adequately update. The acquisition for PT RAJ and PT TPR was already completed in 2016.</p>	
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		PT TPR	Not Certified	2025					<p>Justification to revise the TBP on certification completion by 2025 as per following:</p> <ol style="list-style-type: none"> 1. The estates, PT Rambang Agro Jaya (PT RAJ) and PT Temperai Palm Resources (PT TPR) were acquired in June 2016 but were put under rehabilitation decision for three (3) years from June 2016 – June 2019. 2. Management decision for certification planning program and budget was approved in April 2019 and progress of appointing the Consultant completed in December 2019 (ref. Perjanjian Jasa Consultansi). Hence our timeline for the certification program is set to start from 2020. 	
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										<p>3. Due to continuous MCO in 2020 and 2021, we managed to only complete the Baseline Analysis for ISPO and RSPO with the GAP Action Plan summarized by the Consultant. We are planning to continue the project this year but revival of the progress is currently having few major issues that still due as deliberated in our slides.</p> <p>4. The statement TBP in RSPO Public Summary was not adequately update. The acquisition for PT RAJ and PT TPR was already completed in 2016.</p>
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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 1 (one) Critical; 2 (two) Minor nonconformities and 2 (two) Opportunity For Improvement raised. The Pasir Panjang Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2286196-202212-M1	Issued Date	08/12/2022
Due Date	07/03/2023	Closure Date	08/02/2023
Indicator & Category (Critical / Minor)	3.6.2 – Critical Non Conformity		
Statement of Nonconformity:	The effectiveness of the Safety Plans was not monitored adequately		
Requirement Reference:	The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
Objective Evidence:	<p>Siang Estate</p> <ol style="list-style-type: none"> 1. The Staff and Premix Attendant entered the Chemical Store without using appropriate PPE such as Respirator. This was against the procedures placed in front the stores which require any personals entering the chemical store to wear appropriate PPEs. 2. First Aid Box at the Workshop did not have sufficient items such as Yellow Lotion. The Box also did not have the list of required items. It was verified that the "Campuran Iodin" and "Yellow Lotion" was not equipped in the box as stated in the Panduan Kerja Selamat; Doc Number: Kulim/PKS/OSH-1; Arahan Untuk Mengurus Peti Pertolongan Cemas. 3. The Acetylene Tank used for welding works were not equipped with Flashback Arrestor. The HIRARC was verified and seen to have not identified the risks and hazards associated to gas leakages while operating oxygen and acetylene tanks. 4. Mineral Water bottle was stored with hydraulic oil and placed on the tractor without any relabelling. It was not in line with OSH (USECHH) Regulations 2000, Part VI Labelling & Relabelling; 21, (2) When the labels mentioned in sub regulation (1) are removed, defaced, modified or altered while the chemical hazardous to health is being used at the place of work, the employer shall re-label the chemical. 5. During site visit at Siang Estate, Harvesting Gang, Field P06/01, it was found that 2 harvesters was not wearing safety helmet while harvesting the FFB. It was not in line with Prosedur Kerja Selamat (1) Memotong Buah Sawit dated 01/03/2021 Reference No: KULIM/PKS/OSH-1 Section 1.1.4 Peralatan 		

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	<p>Perlindungan Keselamatan Peribadi(PPE) Topi Keselamatan, Kasut Getah, Sarung Tangan Bersesuaian Dan Cermin Mata Keselamatan.</p> <p>6. During site visit at Siang Estate, Harvesting Gang, Field P06/01, it was found that Mechanical Buffalo Driver was wearing rubber shoes. It was not in line with Prosedur Kerja Selamat (6) Pemanduan Badang/Mechanical Buffalo (MB) dated 01/03/2021 Reference No: KULIM/PKS/OSH-1 Section 6.1.4 Peralatan Perlindungan Keselamatan Peribadi(PPE) Topi Keselamatan, Kasut Keselamatan, Baju Pantul Cahaya Dan Cermin Mata Keselamatan.</p>
<p>Corrections:</p>	<ol style="list-style-type: none"> 1. Training has been conducted to all personnel on appropriate PPE, Panduan Kerja Selamat (i.Arahan Untuk Mengurus Peti Pertolongan Cemas, ii. Memotong Buah Sawit), risk of identification and Hazard in HIRRARC and relabeling under OSH (USECHH) Regulations 2000, Part VI Labelling & Relabelling; 21, (2) When the labels mentioned in sub-regulation (1) on 11.12.2022. 2. Immediate Enforcement at the workplace with regards to compliance with OSH requirements through the checklist by the OSH committee team i.e. First Aid box, Flashback Arrestor at workshop and OSH (USECHH) Regulations 2000, Part VI Labelling & Relabeling; 21, (2) When the labels mentioned in sub-regulation (1).
<p>Root Cause Analysis:</p>	<p>Insufficient monitoring of the safety management plan due to estate management:</p> <ol style="list-style-type: none"> 1. Inadequate understanding of PPE use at Chemical Store, 2. EHA was not aware of the required item in First Aid Box 3. Implementation of Flashback Arrestor at the workshop was not monitored effectively 4. Lack of understanding of OSH (USECHH) Regulations 2000, Part VI Labelling & Relabeling; 21, (2) When the labels mentioned in sub-regulation (1) 5. Inadequate enforcement on harvesters PPE usage by estate management
<p>Corrective Actions:</p>	<ol style="list-style-type: none"> 1. Refresher training will be conducted regularly for all personnel at the respective workplace as per training plan with training evaluation. 2. Quarterly monitoring at the workplace (Workplace Inspection) with regard to compliance with OSH requirements by OSH committee and Safety Officer/ Assistant Safety Officer.
<p>Assessment Conclusion:</p>	<p>Major NC Close Out</p> <ol style="list-style-type: none"> 1. Refresher training has been conducted: Detail of training as per below: <ul style="list-style-type: none"> • Training on Chemical Handling inclusive of PPE, Handling of chemicals, Ventilator at Store, Issuance of chemical based on SOP, Upkeep of chemical store conducted on 12/12/2022 to Store Keeper. Sighted Training evaluation has been documented. • Training on Safe Tractor Driver (Tractors and Mechanical Buffalo) has been conducted on 13/12/2022 to all drivers. Sighted evidence of Training materials, attendance and photos. Sighted Training evaluation has been documented. • Training at Workshop has been conducted related to PPE, Acetylene and Oxygen Tank dated 15/12/2022. . Sighted evidence of Training materials,

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	<p>attendance and photos. Sighted Training evaluation has been documented.</p> <ul style="list-style-type: none"> • Training on PPE for harvesting has been conducted on 11/12/2022 to harvesters. Sighted evidence of Training materials, attendance and photos. Sighted Training evaluation has been documented. • First Aid Training has been conducted on 13/12/2022 to all first aiders. Training was given by EHA. Sighted evidence of Training materials, attendance and photos. Sighted Training evaluation has been documented. • Training on USECHH Regulation on Relabelling of chemical containers has been conducted on 23/12/2022. Sighted evidence of Training materials, attendance and photos. Sighted Training evaluation has been documented. <p>2. Quarterly monitoring at the workplace with regard to compliance with OSH requirements by OSH committee and Safety Officer/ Assistant Safety Officer has been conducted. Refer Sample of Workplace Inspection at Workshop for the month of January 2023 for the 1st Quarter. Verified document of workplace inspection for Clinics, First Aid Box, Harvesting Operation and Chemical Store.</p> <p>3. Interview has been conducted to sample workers at Harvesting Operation, Foreman at Workshop, Chemical Store Person In charge, First Aiders and Field Supervisor found they have good understanding on the training given and show good awareness on safety at respective area.</p> <p>4. Site visit at estate (Harvesting Area P10/3, Clinics, Workshop and Chemical Store) found all correction and corrective action has been implemented.</p> <p>Based on the above evidence, the major Non-Conformity is closed effectively on 08/02/2023. Continuous implementation will be further verified in the next assessment.</p>
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Non-conformity			
NCR Ref #	2286196-202212-N1	Issued Date	08/12/2022
Due Date	Next Assessment (ASA1_2)	Closure Date	Next Assessment (ASA1_2)
Indicator & Category (Critical / Minor)	2.2.2 Minor		
Statement of Nonconformity:	The contractor engaged by Siang Estate to provide harvesting services had failed to comply with legal labour requirements related to monthly contributions and deductions under the SOCSO, EPF and EIS Acts. There was also no evidence of legal due diligence carried out by the unit of certification.		
Requirement Reference:	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.		

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Objective Evidence:	<p>Hoh Builder (M) Sdn Bhd, a company contracted by Siang Estate to provide harvesting services from 01/08/2022 to 31/12/2022, had failed to comply with the requirements under Employment Insurance System Act 2017, Employees Provident Fund Act 1991 and Employees’ Social Security Act 1969. The unit of certification also could not demonstrate that legal due diligence was carried out on the said contractors. Workers’ payslips showed that:</p> <ol style="list-style-type: none"> 1. Monthly EPF deductions for August and September 2022 (from employee & employer) were not made. 2. Monthly EIS deductions for August, September and October 2022 (from employee & employer) were not made. 3. Monthly SOCSO deductions for August and September 2022 (from employee & employer) were wrongly calculated. <p>The affected workers were as follows:</p> <ol style="list-style-type: none"> 1. Worker IC No: xxxxxx-xx-5249 2. Worker IC No: xxxxxx-xx-5873 3. Worker IC No: xxxxxx-xx-5717 4. Worker IC No: xxxxxx-xx-6885 5. Worker IC No: xxxxxx-xx-5639 6. Worker IC No: xxxxxx-xx-1881 7. Worker IC No: xxxxxx-xx-6853
Corrections:	Estate to collect all related documents to comply with legal and labour requirements related to monthly contributions and deductions under the SOCSO, EPF and EIS Acts from the contractor.
Root Cause Analysis:	Lack of monitoring by estate management on compliance with the requirements under Employment Insurance System Act 2017, Employees Provident Fund Act 1991 and Employees’ Social Security Act 1969 due to inadequate information. Estate management was not established monthly monitoring for contract workers’ payslips.
Corrective Actions:	<ol style="list-style-type: none"> 1. Estate management to conduct periodic training or briefing to contractor on the document related to complying with the requirements under Employment Insurance System Act 2017, Employees Provident Fund Act 1991 and Employees’ Social Security Act 1969. 2. Monthly checking on all contractor’s workers’ documents i.e., payslips should be carried out for monitoring purposes to ensure full compliance by the contractor.
Assessment Conclusion:	The submitted CAP detailing on proposed actions to be taken to address the raised nonconformity, based on the root cause identified were reviewed and deemed to be appropriate. Thus, the effectiveness of the CAP will be verified during the next surveillance assessment.

Non-conformity			
NCR Ref #	2286196-202212-N2	Issued Date	08/12/2022

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Due Date	Next Assessment (ASA1_2)	Closure Date	Next Assessment (ASA1_2)
Indicator & Category (Critical / Minor)	7.3.2 Minor		
Statement of Nonconformity:	The Disposal of waste was not conducted in responsible manner		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	Found during linesite inspection at Ladang Pasir Panjang, a car skeletal frame half covered with Mucuna bracteata sp left abandoned next to House No.LPP 59 for at least the past 7 months.		
Corrections:	<ol style="list-style-type: none"> 1. The owner has arranged scrap iron collector to collect the car’s skeletal frame immediately and clean up the area. 2. Estate management will issue reminder letter to respective workers. 		
Root Cause Analysis:	The LPP management team had discussed several times with the owner of the car’s skeletal frame to remove it immediately. However, due to financial problems, the car’s skeletal frame was left over for almost 2 months in the reported area. Ineffectiveness of communication to the workers due to lack of understanding on proper disposal of waste material, according to procedures.		
Corrective Actions:	<ol style="list-style-type: none"> 1. Estate will thoroughly check from line site inspection and continuously follow up with the owner if this kind of problem occurs in future. 2. Estate management thoroughly checks and continuously communicates and briefs the workers during stakeholder meeting and training on the proper disposal of waste material, according to procedures. 		
Assessment Conclusion:	The submitted CAP detailing on proposed actions to be taken to address the raised nonconformity, based on the root cause identified were reviewed and deemed to be appropriate. Thus, the effectiveness of the CAP will be verified during the next surveillance assessment.		

Opportunity for Improvements	
OFI #	Description
OFI 1	1.2.1 All contractors sign agreements with Kulim Plantations Berhad to regulate the business affairs and to make both parties aware of their rights and obligations under the contract. It would enhance the contractors’ understanding of all terms and conditions in the contract if the documents are prepared in bi-lingual.

Opportunity for Improvements	
OFI #	Description
OFI 2	6.5.1

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	Briefings to workers were given during daily morning musters. The effectiveness of the muster briefings would be enhanced if all contract workers are also made to attend the daily muster briefings.
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Positive Findings	
PF #	Description
PF 1	Good arrangement for audit visit and high commitment by Sustainability Department and units person in charge.
PF 2	Good positive relationship maintained and highlighted by internal and external stakeholders

3.3.1 Status of Nonconformities Previously Identified and Observations

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

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

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3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2286196-202212-M1	Critical	3.6.2	08/12/2022	Close out on 08/02/2023
2286196-202212-N1	Minor	2.2.2	08/12/2022	Open
2286196-202212-N1	Minor	7.3.2	08/12/2022	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 Pasir Panjang Palm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Government Department	Farah Abd Rahman, Labour Office, Johor Bahru. Puan Ross, KWSP Call Centre, Bangi.	Telephone
Trade union	Vannan, NUPW Kluang	Telephone
Shop/cafe operators	1. Ibrahim Esa, Kedai Makan Bukit Payung 2. Siti Fatimah Maidin, Kedai Berkat CT Zin Enteprise, Bukit Kelompok Estate. 3. Mazanah Mohd Yasin, Kedai Rul & Ral Trading, Bukit Kelompok Estate. 4. Maznah Miskam, S& MK Enteprise, Ladang Pasir Logok. 5. Mohd Zainol rezza Zakaria, Kedai Runcit Bukit Payong Division	Face-to-face

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	<ol style="list-style-type: none"> 6. Muhd Aizat Afiq bin Minhad, Kedai Makan Keyla, Pasir Panjang Estate. 7. Ong Boon Wah, Kedai Yoke Lan, Pasir Panjang Estate. 8. Parti Wagiman, Kedai Makan Parti, Pasir Panjang Estate. 9. Zaihazreen Rosli, Kedai Makan, Siang Estate. 10. Siti Hasnah Sulaiman, Kedai Runcit, Siang Estate. 	
Nearby school	Wan Supian bin Wan Ta'alim, SK Tunjuk Laut	Face-to-face
Nearby estate	Isradani Yusof, Ladang Aliran Semangat	Face-to-face
Contractor (manpower suppliers)	<ol style="list-style-type: none"> 1. Ayob Idris & Mariana Mohd Hamzah, Bina Tab Sdn Bhd 2. Lim Ah Lek & Lim Yang Yu, Perniagaan Sri Mahtai. 3. Kallaiselvam, RKP Enterprise. 	Face-to-face Telephone
Contractor (backhoe)	Nur Azura Sidak & Nur Umairah Haziqah,	Face-to-face
Contractor (transporters)	<ol style="list-style-type: none"> 1. Lim Sui Chong (FFB transporter), Lim King Guan 2. Ibrahim Sahri (CPO transporter), Mirzafil Sdn Bhd. 	Face-to-face
Service providers	<ol style="list-style-type: none"> 1. Tan Chun Wei, Kejuruteraan Cabaran 2. Zuki Arob (school transporation) 3. Roni (Siang Estate, linesite rubbish collector) <p>Julyanamurni Shamsuddin (collect letters from Post Office for Pasir Logok Estate)</p>	Face-to-face

Stakeholders comment

1.	<p>Feedbacks:</p> <ol style="list-style-type: none"> 1. Labour Office, Johor Bahru and NUPW Kluang confirmed that workers are allowed to work on their rest days (even if they work every rest day in a month) provided they are paid a rest day rate, which is 1.5. 2. The KWSP Call Centre in Bangi was consulted on EPF contributions of temporary workers. One Puan Ross confirmed that EPF contributions are payable even for temporary workers. <p>Management response:</p> <p>Harvesting gang are given the option to work on rest days and they are paid the rest day rate of 1.5.</p>
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	<p>Audit Team verification and response:</p> <ol style="list-style-type: none"> Sighted harvesters giving their written consent to work on rest day. Verified that these workers are paid the rest day rate of 1.5. The contractor at Siang Estate (Hoh Builder (M) Sdn Bhd) had failed to make EPF contributions for its workers for 2 months in a row, and this has been raised as a Minor Non-Compliance under Indicator 2.2.2 below.
<p>2.</p>	<p>Feedbacks:</p> <p>Service providers & contractors informed that there is a good business relationship with the respective estates/mill within Pasir Panjang Palm Oil Mill and its supply base. They understand their contracts, they were briefed of the contents. However, some prefer to have the contract prepared in Bahasa Malaysia for easier understanding.</p> <p>Payments are made online, which are usually received within less than 14 days of invoice.</p> <p>They were invited to attend an online stakeholder meeting on 14/11/2022 where Kulim Plantation Berhad’s policies were briefed which included no child labour, anti-bribery and grievance mechanism.</p> <p>All in all, this group of stakeholders confirmed that they have a good relationship with the respective estates and mill.</p> <p>Management response:</p> <p>Noted all comments.</p> <p>Audit Team verification and response:</p> <p>The issue of stakeholders request for contracts to be drafted and signed in Bahasa Malaysia or bi-language has been communicated to Kulim (Malaysia) Berhad before. However, this has not been done and it is being raised as an Opportunity for Improvement in this audit.</p>
<p>3</p>	<p>Feedback:</p> <p>Grocery shops and café operators informed that in general, there are no complaints. Food prices are fixed based on market price of raw items/ingredients, and they submit regularly price of food and items sold in the grocery shops to the estate/mill management for price monitoring. One challenge faced is workers leaving the company’s employment and abscond with payment. However, the amount is not much. The canteen operators also have received typhoid injections and attended the Food Handling Course accredited by the Ministry of Health.</p> <p>Management Response:</p> <p>Noted the feedback received. Will ensure all food handlers (not just a canteen representative) attend the Food Handling Course accredited by the Ministry of Health.</p> <p>Audit Team verification and response:</p> <p>All the canteen operators have been vaccinated against typhoid, and verified that the vaccinations are still valid. Food handlers have also attended the online food handling course accredited by the Ministry of Health. It would however be better if there are two food handlers, that both attend the said course.</p>
<p>4</p>	<p>Feedback:</p> <p>Feedback from the Headmaster of SK Tunjuk Laut confirmed that Pasir Panjang Mill has been providing assistance both in kind (manpower during <i>gotong royong</i>) and in cash (donations) on a regular basis. The school 100% caters to the children of Kulim Plantation Berhad employees. The Head Master extends his gratitude and appreciates the collaboration given.</p> <p>Management response:</p> <p>In addition to the above, electricity and water supplies to SK Tunjuk Laut are also being provided free of charge by Pasir Panjang Mill.</p>

	<p>Audit Team verification and response: No further action.</p>
5	<p>Feedback: Aliran Semangat Estate (815ha) is a neighbouring estate. It shares the same access road, and confirms that repair work, if needed, are being shared. There is no issue of overplanting, and boundaries are clearly demarcated. Aliran Semangat Estate and Kulim (Malaysia) Berhad share important information for example any threats of elephant incursions. Relationship between parties has always been good and there have been no adverse issues.</p>
	<p>Management response: Comments were noted.</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
N/A	N/A	N/A	N/A	N/A	N/A
This operating unit already 2 cycle of certification					



Previous land owner / user comment	
	<p>Feedbacks: This operating unit already 2 cycle of certification</p>
	<p>Audit Team verification and response: No further verification required.</p>

3.5 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Mahamurni Plantations Sdn Bhd – Pasir Panjang POM and Supply Bases 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 Key in Mahamurni Plantations Sdn Bhd – Pasir Panjang POM and Supply Bases is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: NOR HALIS ABU ZAR	Name: SALASAH ELIAS
Company Name: BSI SERVICES MALAYSIA 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: 08/02/2023	Date: 09/02/2023

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>Pasir Panjang Palm Oil Mill and its supply base were able to demonstrate the availability of documents specified in the RSPO P&C to the public. These documents can be accessed by the public via the Company’s website http://www.kulim.com.my</p> <p>These documents are also available at each operating unit:</p> <ul style="list-style-type: none"> a) Land titles/user rights b) Occupational health and safety plans c) Plans and impact assessments relating to environmental and social impacts d) HCV documentation e) Pollution prevention and reduction plans f) Details of complaints and grievances g) Continuous improvement plans 	Complied

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		<ul style="list-style-type: none"> h) Public summary of certification assessment report i) Human Rights Policy j) Summary report of contributions to community development . 	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>As recorded in the external stakeholder meeting minutes which was conducted online on 14/11/2022, information available to stakeholders are prepared and delivered in Bahasa Malaysia by Kuim (Malaysia) Berhad’s Deputy Manager, Sustainability & Quality Department.</p> <p>Other information provided to relevant stakeholders included:</p> <ul style="list-style-type: none"> a. Quarterly return form given by Pasir Panjang Mill to the Department of Environment (DOE) dated 12/04/2022 which contained information such as total CPO produced, total FFB processed, total metered or estimated water consumption, etc. b. Extra information provided by Pasir Panjang Mill to the Johor DOE via letter dated 27/06/2022 pursuant to an appeal to reduce penalty imposed for a delay in license renewal. Among the information provided was the reason for the delay, i.e., technical problems faced by the BLESS system in March 2022. And why there was a delay. And information provided 	Complied

1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>Sighted during the audit of Pasir Panjang Mill and its supply base were records of requests for information received from stakeholders such as internal auditors asking for confidential information.</p>	Complied
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>Kulim (Malaysia) Sdn Bhd’s communication procedures is documented under the Company’s Communication and Consultation Management System Issue No. 1 Doc. No. SQD/SMS/1.1 dated 1/08/2020. This procedure applies to all communications and consultations between the Company and its internal and external stakeholders.</p> <p>The SOP was disclosed and explained during external stakeholder meeting held on 14/11/2022 which was attended by 88 stakeholders comprising contractors, suppliers, grocery shops, etc.</p> <p>For internal stakeholders, briefings were given to all workers as follows:</p> <p>Bukit Kelompok Estate: 06/01/2022</p> <p>Pasir Logok Estate: 02/12/2022</p> <p>Pasir Panjang Mill: 01/08/2022</p> <p>Siang Estate: 10/08/2022</p> <p>Pasir Panjang Estate: 11/05/2022.</p>	Complied

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		<p>Interviews conducted with the workers and external stakeholders confirmed their understanding of this procedure.</p> <p>Implementation of the procedure was demonstrated when Q&A session was held with external stakeholders on 14/11/2022. Similarly with internal stakeholders, various consultations and communications joined the meeting on and minutes of the meeting dated 12/10/2022 between Pasir Panjang Estate management and occupants of Rumah Bakti Ladang regarding the planned demolition of unauthorized house extensions is available.</p>	
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>Each unit within Pasir Panjang Mill and its supply base has its own current list of contacts and details of their stakeholders. The details include the stakeholders' address, telephone number and their nominated representatives.</p> <p>These stakeholders include suppliers, contractors, service providers, transporters, list of CPO and PKO buyers, government agencies such as Dept of Wildlife and National Parks, Labour Department, Immigration Dept, Dept of Safety and Health, Indonesian Consulate, Bangladeshi High Commission, schools, local communities such as surrounding villages such as Kg Sedili Besar, nearby schools, clinics, etc.</p>	Complied
<p>Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.</p>			

<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>A Policy for ethical conduct for Kulim (Malaysia) Berhad has been developed and available, and is known as Ethics Policy signed by the Executive Director and updated on 7/12/2021. Additionally, there is also the No Gift and Entertainment Policy also signed by its Executive Director and updated in August 2021. A review of the stakeholder meeting minutes confirmed that these Policies were communicated to all external stakeholders during stakeholder meeting held on 14/11/2022.</p> <p>Contracts signed between Kulim (Malaysia) Berhad and its contractors and manpower service providers contain a provision that they would comply with the Company's Code of Business Ethics. Interviews held with contractors and suppliers confirmed their understanding and compliance with this Policy.</p> <p>Among the contracts reviewed were agreements with:</p> <ul style="list-style-type: none"> a. Perniagaan Sri Mahtai dated 17/05/2022 (harvesting services) b. RKP Enterprise dated 01/04/2021 (harvesting services) c. PT Hamparan Karya Insani dated 27/05/2022 (recruitment agent) <p>All contractors sign agreements with Kulim Plantations Berhad to regulate the business affairs and to make both parties aware of their rights and obligations under the contract. It would enhance the contractors' understanding of all terms and conditions in the contract</p>	<p>OFI</p>
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		if the documents are prepared in bi-lingual. Therefore, an OFI was raised under this Indicator.	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>The system in place to monitor compliance and implementation of the No Gift and Entertainment Policy, Ethics Policy and overall business practice include:</p> <ul style="list-style-type: none"> a. Stipulating limits of authority under Kulim Subsidiaries Limits of Authority Document No. KMB/PLC/GOV/PMU/002 effective 15/12/2021 which contains provisions for procurement and contracts administration. This document is to ensure consistency, effective and efficient management of levels of approvals and authority limits throughout Kulim (Malaysia) Berhad’s subsidiaries. b. Integrity and ethics declaration signed by all levels of employees (management, workers) called Employee Integrity Pledge Form These are written forms committing to no conflict of interest situations, will not engage in bribery, corrupt practices, improper conduct, money laundering, will not commit criminal breach of trust. to signed by all estate managers, assistant managers, mandores, and workers. c. Every employee to sign a Declaration of Conflict of Interest form upon joining the unit of certification to ensure no conflict of personal interest which may affect judgment or impartiality. 	Complied

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		<p>d. Conduct annual internal audits to ensure compliance against company policies and procedures The last internal audit was conducted on 13/11/2022.</p> <p>Notice against giving gifts being placed outside the front door seen at Bukit Kelompok Estate office.</p>	
<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>Pasir Panjang POM and Estates has documented all Licence, permit and applicable Law and Regulations to ensure compliance towards all applicable local, national and ratified international laws and regulations. The compliances is guided by the document Sustainable Management System; Compliance To Legal Requirement; Document Number: SQD/SMS/2.0; Document Date: 01/08/2020; Issue: 01.</p> <p>Among permit and license sampled were:</p> <p>Bukit Kelompok Estate</p> <ol style="list-style-type: none"> 1. MPOB License, #620166002000; Validity Period: 01/04/2022 – 31/03/2023. 2. Permit Barang Kawalan Berjadual, #KPDNKK.J.KTG/PERMIT Khas 0052 (PD) Diesel 20000 liter valid from 01/11/2022 to 31/10/2023 	<p>Complied</p>

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		<ol style="list-style-type: none"> 3. Air Compressor #JH PMT 22733, Validity until 25/08/2023. 4. Lesen Bagi Pemasangan Persendirian #58512 valid from 23/12/2022 to 22/12/2023. 5. BAKAJ Licence #BAKAJ/334/300/05/08/07/19 valid until 31/12/2022 6. Bukit Kelompok Estate has obtained approval from Jabatan Tenaga Kerja Negeri Johor for deduction of wages for the following: <ul style="list-style-type: none"> • Ref. No.: TK (NJ) U-21 dated 31/03/2019 for Skim Khairat Keluarga Perbadanan Johor for RM 5 per month and premium not more than RM 37.50. <p>Pasir Logok Estate</p> <ol style="list-style-type: none"> 1. MPOB License (FFB) #620145002000, Validity Period: 01/03/2022 to 31/03/2023 2. Permit Barang Kawalan Berjadual, #J003038 #KPDNKK.J.KTG/PERMIT0050, Description: Diesel, Validity Period: 11/04/2022 to 10/04/2023 3. License for Diversion and Extraction of River Water #07/A/KT/009; Validity Period: 23/01/2022 to 31/12/2022. 4. SPAN License, #SPAN/EKS/(PT)/800-4(1)/6/15, Validity Period: 26/08/2020 to 25/08/2023. 	
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		<p>5. Air Compressor #JH PMT 22734, Validity Period: 29/03/2022 to 25/08/2023</p> <p>6. Sijil Pendaftaran Akta LEVI Keuntungan Luar Biasa 1998 #J31-200800000102 effective on 07/08/2008</p> <p>Pasir Panjang POM</p> <p>1. MPOB License, #592302004000, Validity Period: 01/01/2023 to 31/12/2023</p> <p>2. DOE License – Compliance Schedule; License Number: 004649 License validity period: 03/07/2022 to 30/06/2023</p> <p>3. River Water Diversion and Extraction License, #07/A/KT/117 valid from 01/01/2022 to 31/12/2023</p> <p>4. SPAN Licence #LK/3/22/01510 valid from 14/07/2022 to 13/07/2025</p> <p>5. HALAL Certificate #JAKIM/(S)/(22.00)/492/2/1081-03/2014 valid from 16/02/2021 to 15/02/2023</p> <p>6. Permit Barang Kawalan Berjadual, #KPDNKK.J.KTG/PERMIT0028(PD)(R); Description: Diesel; Storage Quantity: 20,000 Litres, Validity Period: 26/05/2022 to 25/05/2023.</p> <p>7. Energy Commission – Private Installation License, #2022/01043 valid from 06/07/2022 to 05/07/2023</p>	
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		<p>8. Weighbridge Inspection #2105038BC1, Safety Sticker #DE18-001575 inspected on 04/08/2022</p> <p>9. Pasir Panjang POM has obtained approval from Jabatan Tenaga Kerja Semenanjung Malaysia for overtime limit and Jabatan Tenaga Kerja Negeri Johor for deduction of wages as below:</p> <ul style="list-style-type: none"> • Ref. No.: BHG. PU/9/134 Jld 34 (8) dated 03/12/2020 for overtime limit to 130 hours per month. • Ref. No.: TK (NJ) U-21 dated 31/03/2019 for Recreation Fee for RM 10.00. • Ref. No.: TK (NJ) U-21 dated 02/05/2019 for medical fee more than subsidized amount. <p>10. Competent Person: Certified Environmental Professional In Schedule Waste (CePSWaM), #CePSWaM/01921 dated 31/05/2019 to Mill Manager NRIC 840731-XX-XXXX</p> <p>11. Competent Person: Certified Environmental Professional In The Treatment Of Palm Oil Mill Effluent (CePPOME) #CePPOME/00061 dated 17/07/2017 to Assistant Engineer NRIC 850102-XX-XXXX</p> <p>12. Competent Person: Boiler Man #PJ-T-1B-0378-2008 dated 25/09/2008 to Assistant Engineer NRIC 810808-XX-XXXX</p> <p>13. Written Notification to DOE for 2 units of Genset</p>	
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		<p>#AS(B)J31/152/000/010Jilid2(06) dated 09/10/2014</p> <p>14. Written Notification to DOE for 1 unit of Containerized Biogas Engine #AS9B)J91/110/616/016 dated 19/06/2019</p> <p>Siang Estate</p> <ol style="list-style-type: none"> 1. MPOB License, #575783002000; Validity Period: 01/09/2022 – 31/08/2023 2. Permit Barang Kawalan Berjadual, #KPDNKK.J.KTG/PERMIT 0268 (PD) Diesel 10,800 liter valid from 21/03/2022 to 20/03/2023 3. Air Compressor #JH PMT 22700, Validity until 25/08/2023. 4. Lesen Bagi Pemasangan Persendirian #58512 valid from 23/12/2022 to 22/12/2023. 5. BAKAJ Licence #BAKAJ/334/300/05/08/08/14 valid until 31/12/2022 6. Weighbridge Inspection by Metrology Corporation Malaysia Sdn Bhd #210503836F dated 14/07/2022 <p>Pasir Panjang Estate</p> <ol style="list-style-type: none"> 1. MPOB License, #578736002000; Validity Period: 01/12/2022 – 30/11/2023 2. Permit Barang Kawalan Berjadual, #KPDNKK.J.KTG/PERMIT 	
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		<p>0233 (PD) Diesel 10,800 liter valid from 24/01/2022 to 23/01/2023</p> <p>3. Air Compressor #PMT-JH/22 178869, Validity until 25/08/2023.</p> <p>4. Lesen Bagi Pemasangan Persendirian #58512 valid from 23/12/2022 to 22/12/2023.</p> <p>5. BAKAJ Licence #BAKAJ/334/300/05/08/07/16 valid until 31/12/2022</p> <p>6. SPAN Licence #2022/03575 valid from 29/11/2022 to 28/11/2023</p>	
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>Pasir Panjang POM certification unit continued to implement and maintain their established documented system for identifying, accessing, tracking updates and monitoring of compliance with the legal requirements that are applicable to the CU's operation.</p> <p>Each office of the operating unit (mill and estate) has its own legal requirements register (LRR) and were being evaluated individually from time to time for compliance mainly through internal audit. Among the applicable legal laws registered are EQA, OSHA, Factory & Machinery Act, Employment Act, and Workers' Minimum Standard of Housing and Amenities Act.</p> <p>Latest updated has been done on 31/08/2022 with updating Of Minimum wages Order 2022, Employees Provident Fund (Amendment No. 2) Rules 2022, Employees Provident Fund (Amendment Of Eight Schedule) Order 2022 and Prevention And</p>	Complied

		<p>Control Of Infectious Disease (Measures Within Infected Local Areas) (National Recovery Plan) (Transition Phase To Endemic) 2022.</p> <p>Tracking system available to identify changes in the relevant regulations through head office, sustainability team, website information and the information are communicated from the Head Office. Kulim (Malaysia) Berhad have centralised system for tracking any changes in the law. The tracking law person in-charge is Pn Norazimah Abas ((24) RMI/COM/GM/2022/24) dated 21/07/2022 who will maintain the changes in laws and updated the Legal and other requirement in Pasir Panjang Complex.</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>Legal or authorised boundaries are clearly demarcated and visibly maintained as per verification during site visit. Whenever the land boundaries are adjacent with third party (smallholders, villages, other oil palm companies, etc.) the normal practice of sample estate to indicate the legal boundaries are through construction of trenches and parameter road. This was confirmed through the field visit at Pasir Panjang Estate and Bukit Kelompok Estate. Apart from that, erection of concrete slab with GPS coordinate along the boundaries was also commonly practiced and clearly visible. Boundary and monthly patrolling record was verified.</p> <p><u>Bukit Kelompok Estate</u></p>	Complied

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		<p>Sighted boundary peg at P06/03 (No.122) and P13/01 (No. 113), Neighbouring to Felda Tenggaroh 6. Verified that there is no planting beyond these legal or authorised boundaries.</p> <p><u>Pasir Logok Estate</u></p> <p>Sighted boundary peg at P11/03 (No.112) and P08/02 (No. 97), Neighbouring to Ladang Pesara Kerajaan. Verified that there is no planting beyond these legal or authorised boundaries.</p> <p><u>Siang Estate</u></p> <p>Sighted boundary peg at P10/02 (No.130) and P10/04 (No. 4), Neighbouring to Desaru Farm. Verified that there is no planting beyond these legal or authorised boundaries.</p> <p><u>Pasir Panjang Estate (Bukit Payung Div.)</u></p> <p>Sighted boundary peg at P17/02 (No.24) and P17/02 (No. 21), Neighbouring to Pasir Panjang River. Verified that there is no planting beyond these legal or authorised boundaries.</p>	
<p>Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements</p>			
<p>2.2.1</p>	<p>A list of contracted parties is maintained. - Minor compliance -</p>	<p>The operating units has listed all contracted parties and documented in Stakeholder List. In the list includes internal stakeholders such as employee and workers union and external stakeholders such as suppliers, contractors, transporters, products buyers, head of local communities and other interested parties such as government</p>	<p>Complied</p>

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		<p>department, hospitals, schools and etc. the list was reviewed and updated on annually basis.</p>	
<p>2.2.2</p>	<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. For FFB suppliers, the clauses on meeting applicable legal requirements were stated in clause 14 which stated as follows:</p> <p>“The supplier shall be bound to follow and adhere to all rules and regulations set forth by Government of Malaysia, all Mahamurni Group relevant business policies and compliance to respective mill’s Certification Program Standards.”</p> <p>Reviewed the sampled contracts as follows:</p> <ul style="list-style-type: none"> a. Contract agreements between Mahamurni Plantations Sdn. Bhd. with Contractor RKP Enterprise, Ref: MPSB/LPL 1/57/2020 for harvesting of Fresh Fruit Bunches (FFB) in Field P10 & P11 at Pasir Logok Estate, Kota Tinggi, Johor. Contract period 01/06/2020 until 31/05/2023 b. Contract agreements between Mahamurni Plantations Sdn Bhd with Contractor Janadunia Sdn Bhd; Contract Number: PPPOM 06/2022 for Supply of Materials, Skilled Labour, Tools and Consumable Tools to Replace Bottom Plate for Vertical Steriliser No.1. Contract Period 18/07/2022 – 31/08/2022. c. Contract agreements between Mahamurni Plantations Sdn Bhd with Contractor Sungai Rezeki Sdn Bhd; Contract Number: 	<p>Non-compliance</p>

		<p>MPSB/SIANG 46/1/2020 for Transporting of FFB (External) from Ramp to Pasir Panjang POM, Sedenak POM & Sindora POM at Siang Estate, Kota Tinggi, Johor. Contract Period 01/04/2020 – 31/03/2023.</p> <p>d. Contract agreements between Mahamurni Plantations Sdn Bhd with Contractor Jeevandran Enterprise; Contract Number: MPSB/LBP 5/85/2019 for Harvesting of Fresh Fruit Bunches (FFB) in Field P14 (310.33 Ha) at Bukit Payung Estate, Kota Tinggi, Johor. Contract Period 01/08/2022 – 31/07/2025.</p> <p>The contractor engaged by Siang Estate to provide harvesting services had failed to comply with legal labour requirements related to monthly contributions and deductions under the SOCSO, EPF and EIS Acts.</p> <p>Hoh Builder (M) Sdn Bhd, a company contracted by Siang Estate to provide harvesting services from 01/08/2022 to 31/12/2022, had failed to comply with the requirements under Employment Insurance System Act 2017, Employees Provident Fund Act 1991 and Employees’ Social Security Act 1969. Workers’ payslips showed that:</p> <p>4. Monthly EPF deductions for August and September 2022 (from employee & employer) were not made.</p>	
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		<p>5. Monthly EIS deductions for August, September and October 2022 (from employee & employer) were not made.</p> <p>6. Monthly SOCSO deductions for August and September 2022 (from employee & employer) were wrongly calculated.</p> <p>The affected workers were as follows:</p> <ol style="list-style-type: none"> 1. Worker IC No: xxxxxx-xx-5249 2. Worker IC No: xxxxxx-xx-5873 3. Worker IC No: xxxxxx-xx-5717 4. Worker IC No: xxxxxx-xx-6885 5. Worker IC No: xxxxxx-xx-5639 6. Worker IC No: xxxxxx-xx-1881 7. Worker IC No: xxxxxx-xx-6853 <p>There was also no evidence of legal due diligence carried out by the Company of all contracted third parties.</p> <p>Thus, Minor NC was raised.</p>	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	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.	Complied

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	<p>- Minor compliance -</p>	<p>For FFB suppliers, the clauses on disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection were stated in clause 14 which stated 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 Mahamurni Plantations Sdn. Bhd. with Contractor RKP Enterprise, Ref: MPSB/LPL 1/57/2020 for harvesting of Fresh Fuit Bunches (FFB) in Field P10 & P11 at Pasir Logok Estate, Kota Tinggi, Johor. Contract period 01/06/2020 until 31/05/2023. 2. Contract agreements between Mahamurni Plantations Sdn Bhd with Contractor Janadunia Sdn Bhd; Contract Number: PPPOM 06/2022 for Supply of Materials, Skilled Labour, Tools and Consumable Tools to Replace Bottom Plate for Vertical Steriliser No.1. Contract Period 18/07/2022 – 31/08/2022. 3. Contract agreements between Mahamurni Plantations Sdn Bhd with Contractor Sungai Rezeki Sdn Bhd; Contract Number: MPSB/SIANG 46/1/2020 for Transporting of FFB (External) from 	
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		<p>Ramp to Pasir Panjang POM, Sedenak POM & Sindora POM at Siang Estate, Kota Tinggi, Johor. Contract Period 01/04/2020 – 31/03/2023.</p> <p>4. Contract agreements between Mahamurni Plantations Sdn Bhd with Contractor Jeevandran Enterprise; Contract Number: MPSB/LBP 5/85/2019 for Harvesting of Fresh Fruit Bunches (FFB) in Field P14 (310.33 Ha) at Bukit Payung Estate, Kota Tinggi, Johor. Contract Period 01/08/2022 – 31/07/2025.</p>										
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.												
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>Pasir Panjang POM received only crop from the Mahamurni Plantation Estates and its own supply bases within the certification scope, or other if any 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 995 1935 1200"> <thead> <tr> <th>Estate</th> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>Siang Estate</td> <td>1° 39' 10.15" N</td> <td>104° 12' 40.23" E</td> </tr> <tr> <td>Bukit Kelompok Estate</td> <td>2° 00' 24.31" N</td> <td>103° 59' 54.39" E</td> </tr> </tbody> </table>	Estate	Latitude	Longitude	Siang Estate	1° 39' 10.15" N	104° 12' 40.23" E	Bukit Kelompok Estate	2° 00' 24.31" N	103° 59' 54.39" E	Complied
Estate	Latitude	Longitude										
Siang Estate	1° 39' 10.15" N	104° 12' 40.23" E										
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		<table border="1" data-bbox="1182 362 1933 509"> <tr> <td data-bbox="1182 362 1449 416">Pasir Logok Estate</td> <td data-bbox="1449 362 1693 416">2° 01' 53.38" N</td> <td data-bbox="1693 362 1933 416">104° 02' 20.35" E</td> </tr> <tr> <td data-bbox="1182 416 1449 509">Sungai Papan Estate</td> <td data-bbox="1449 416 1693 509">1° 31' 01.25"N</td> <td data-bbox="1693 416 1933 509">104° 6' 21.81"E</td> </tr> </table> <p data-bbox="1137 523 1944 715"> 2. All FFB from the supply base estates was supported by the delivery documents and weighbridge tickets. 3. Valid land title with ownership status (refer indicator 4.4.1) 4. Valid MPOB licence - Sungai Papan Estate: MPOB license no. 570243002000 valid from 01/03/2022 – 28/02/2023. </p>	Pasir Logok Estate	2° 01' 53.38" N	104° 02' 20.35" E	Sungai Papan Estate	1° 31' 01.25"N	104° 6' 21.81"E	
Pasir Logok Estate	2° 01' 53.38" N	104° 02' 20.35" E							
Sungai Papan Estate	1° 31' 01.25"N	104° 6' 21.81"E							
2.3.2	<p data-bbox="255 740 1111 836">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 data-bbox="255 852 501 884">- Minor compliance -</p>	<p data-bbox="1137 740 1944 932">Inspected and verified delivery records showed there is no indirect sourced FFB at Pasir Panjang Palm Oil Mill. All FFB supplied are from Mahamurni Plantation Sdn Bhd own estates. They come from PPOM own Supply Base (Pasir Panjang Estate & Bukit Payung Division, Tunjuk Laut Estate, Siang Estate, Bukit Kelompok Estate and Pasir Logok Estate) and Sindora Certification Unit (Sungai Papan Estate)</p>	Complied						
<p data-bbox="143 959 1173 991">Principle 3: Optimise productivity, efficiency, positive impacts and resilience</p>									
<p data-bbox="143 1018 1592 1050">Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>									

<p>3.1.1</p>	<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>Pasir Panjang certification unit has established and implemented its commitment to long term sustainability and improvements through a capital expenditure programme. Annual business plan in the form of annual budget and the projection for 5 years (2023-2027) were prepared as guidance for future planning. In estate the business plan was include harvesting, vehicles, operation including medical expenses, upkeep and cultivation. Verified that the business plan contains FFB throughput, mill utilization rate, CPO, OER and KER, costs of production, and CAPEX.</p> <p>Similarly, the mill has a business plan prepared annually in the form of year budget and the projection for 5 years prepared as guidance for future planning. The business plan among others contains.</p> <ul style="list-style-type: none"> a) FFB Processing & CPO/CPK production forecast b) Extraction Ratios – OER / KER, c) Cost of production d) administration / labour overhead e) processing cost labour, maintenance, consumables f) depreciation and head office charges- g) EVIT running accounts h) CAPEX - capital expenditure. 	<p>Complied</p>
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<p>3.1.2</p>	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>A long-range replanting programme projected for the minimum of 5 years was made available for review. Refer to replanting programme subject to annual review.</p> <table border="1" data-bbox="1137 483 1926 948"> <thead> <tr> <th rowspan="2">Year of Replanting</th> <th colspan="4">Estate / Replanting Ha</th> </tr> <tr> <th>Bukit Kelompok Estate</th> <th>Pasir Logok Estate</th> <th>Siang Estate</th> <th>Pasir Panjang Estate</th> </tr> </thead> <tbody> <tr> <td>2023</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>2024</td> <td>0.00</td> <td>0.00</td> <td>198.58</td> <td>0.00</td> </tr> <tr> <td>2025</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>2026</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>2027</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> </tbody> </table>	Year of Replanting	Estate / Replanting Ha				Bukit Kelompok Estate	Pasir Logok Estate	Siang Estate	Pasir Panjang Estate	2023	0.00	0.00	0.00	0.00	2024	0.00	0.00	198.58	0.00	2025	0.00	0.00	0.00	0.00	2026	0.00	0.00	0.00	0.00	2027	0.00	0.00	0.00	0.00	<p>Complied</p>
Year of Replanting	Estate / Replanting Ha																																				
	Bukit Kelompok Estate	Pasir Logok Estate	Siang Estate	Pasir Panjang Estate																																	
2023	0.00	0.00	0.00	0.00																																	
2024	0.00	0.00	198.58	0.00																																	
2025	0.00	0.00	0.00	0.00																																	
2026	0.00	0.00	0.00	0.00																																	
2027	0.00	0.00	0.00	0.00																																	
<p>3.1.3</p>	<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>Pasir Panjang Certification Unit has conducted Management Review Meeting upon receipt of Internal Audit Report conducted by Sustainability Department. The latest management review meeting as per sample below: -</p> <p>Bukit Kelompok Estate: 30/08/2022</p> <p>Pasir Logok Estate: 15/08/2022</p>	<p>Complied</p>																																		

		<p>Siang Estate: 21/10/2022 Pasir Panjang Estate: 28/08/2022</p> <p>The issue discussed were:</p> <ol style="list-style-type: none"> 1. Chairman remarks 2. Follow up actions from last management review 3. Process performance and product conformity 4. Customer feedback 5. Changes that could affect Management System 6. Results of Internal Audit 7. Results of External Audit 8. Complaints and grievances 9. Other matters <p>For Pasir Panjang POM, Management Review Meeting has been conducted on 14/11/2022. The issue been discussed was include: -</p> <ol style="list-style-type: none"> 1. Chairman speech 2. Conformation of previous meeting 3. Follow up action from previous meeting 	
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		<ul style="list-style-type: none"> 4. Result of Internal and External audits 5. Review process performance and product conformity 6. Changes that could affect the management system 7. Continues improvement 8. Training Other matters 	
<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>The continual improvement plan for financial year 2022 was available for the mill and sampled estates. It was established based on the social and environmental impact. To name a few of the action plans established are:</p> <p><u>Pasir Panjang POM</u></p> <ul style="list-style-type: none"> 1. Implementation of Covid-19 Awareness 2. HIRARC – to review all the related activities at the mill. 3. CSR Food Basket for Covid-19 4. Machine & System – Replacement shovel wheel loader. 5. Processing Plant – Replacement of Biogas reactor floating cover. 	Complied

		<p><u>Pasir Logok Estate</u></p> <ol style="list-style-type: none"> 1. Repair Wall at Fertiliser Store. 2. Additional ERP Signboard at the Linesite 3. Repainting workers quarters (9 Units), Partition Wall (30 Units) and Desludging Septic Tank. 4. Planting Beneficial Plant at main road. 5. Purchase of Mini Kubota (2 Units) and Graber (2 Units) <p><u>Siang Estate</u></p> <ol style="list-style-type: none"> 1. Install and replace safety signages 2. To install additional safety convex mirror 3. Repaint housing (30 Units). 4. To upgrade spotlight Sports facilities Sepak Takraw Court 5. Plant Tunera Subulata at P11. 6. Purchase new mini tractor Grabber. <p><u>Pasir Panjang Estate</u></p> <ol style="list-style-type: none"> 1. Install safety signage at workstation and main road. 2. Installation of 16 units overhead poly water tank, repair workers quarters and Repainting 40 units workers quarters. 	
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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:</p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>RSPO metric template version 2.1 is used for the reporting of Mahamurni Plantation Certification Unit’s metrics (economic, social and environment). Data reporting period is January to December 2021 for (social and environment metrics) and economic metrics from Nov 2021 – Oct 2022 (counting back 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.</p> <p>- Critical (Major) compliance -</p>	<p>Standard Operating Procedure has been developed for the Mill and Estate for guidance in all operation conducted in the site. For Pasir Panjang POM, Standard Operating Procedure (SDPOM/QM), dated 1/2/2018 is referred to. Among activities discussed as below:</p> <ol style="list-style-type: none"> 1. Reception Station 2. Fruit Handling 3. Sterilisation 4. Threshing 	Complied

		<ol style="list-style-type: none"> 5. Empty Bunch Press 6. Digestion and pressing 7. Clarification 8. Kernel Extraction 9. Effluent Treatment & Waste Management 10. Boiler House <p>Estates have a separate SOP that covered mainly on nursery operations, replanting, upkeep mature and immature oil palm and harvesting. Refer Agricultural Manual dated 19/11/2018 with Latest updated on 02/10/2019 for Harvesting Terrace Area, manuring and Mature and Immature Oil Palm: Circle and Selective – Terrace Area. Among activities discussed as below:</p> <ol style="list-style-type: none"> 1. Replanting 2. Roads, Drains, Bridges, Culverts & Fences 3. Construction of Estate Buildings 4. Manuring 5. Harvesting 6. Pruning and Ablation 7. Soil Conservation 	
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		<p>8. Justification of Chemical Uses</p> <p>9. Weeds Management</p> <p>10. Integrated Pest Management</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>Mechanism to check consistent implementation of procedures are in place. Internal audit by SQD department conducted on annual basis to check and report compliance against company policy and procedure with regards to operation, safety, health and welfare requirements. For other to ensure consistency of SOP implementation was verification from Agronomist Report, Regional Controller Report and Plantation Inspectorate Report.</p> <p>Awareness on SOP has been given to the workers and contractors in order to ensure the SOP in the Mill and Estate were implemented. Refer training record as below:</p> <p>Pasir Panjang POM: 15/08/2022</p> <p>Pasir Panjang Estate: 26/08/2022</p> <p>Bukit Kelompok Estate: 08/02/2022</p> <p>Siang Estate: 26/08/2022</p> <p>Workplace inspection (Borang Audit Keselamatan) has been conducted by the person in charge i.e Assistant Manager and Field Staff and discussed in the quarterly OSH Meeting. Latest workplace inspection record as below:</p>	Complied

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		<p>Bukit Kelompok Estate: 22/09/2022 Pasir Logok Estate: 21/09/2022 Siang Estate: 22/09/2022 Pasir Panjang POM: 02/09/2022 Pasir Panjang Estate: 12/09/2022</p>	
<p>3.3.3</p>	<p>Records of monitoring and any actions taken are maintained and available. - Minor Compliance -</p>	<p>Records of monitoring with regards to Best practice SOP and RSPO implementation are maintained and available for verification. Among monitoring records checked:</p> <p><u>Bukit Kelompok Estate</u></p> <ol style="list-style-type: none"> 1. Plantation Inspectorate report visit 03/2022 dated 21/06/2022. 2. Agronomist Report 01/2022 dated 16 & 18/05/2022. 3. Internal audit report dated 25/08/2022 by SQD team (Result 1 NC) <p><u>Pasir Logok Estate</u></p> <ol style="list-style-type: none"> 1. Plantation Inspectorate report visit 03/2022 dated 27/06/2022. 2. Internal audit report dated 26/07/2022 by SQD team (Result No NC) 3. Agronomist Report 01/2022 dated 30/06/2022. 	<p>Complied</p>

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		<p><u>Pasir Panjang POM</u></p> <ol style="list-style-type: none"> 1. Mill Plantation Inspectorate report visit 03/2022 dated 01/06/2022 2. Internal audit report dated 13/11/2022 by SQD team (Result No NC) <p><u>Pasir Logok Estate</u></p> <ol style="list-style-type: none"> 1. Plantation Inspectorate report visit 03/2022 dated 20-21/06/2022. 2. Internal audit report dated 24/07/2022 by SQD team (Result 1 NC) 3. Agronomist Report 01/2022 dated 07/04/2022. <p><u>Pasir Logok Estate</u></p> <ol style="list-style-type: none"> 1. Plantation Inspectorate report visit 03/2022 dated 10-12/04/2022 2. Internal audit report dated 24/07/2022 by SQD team (Result 1 NC) 3. Agronomist Report 01/2022 dated 15/03/2022. 	
<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.</p> <p>- Critical (Major) compliance -</p>	<p>There are no new plantings or new operations within Bukit Kelompok, Pasir Logok, Siang and Pasir Panjang Estates. Nevertheless, each unit has its own Social Impact Assessments done which have been prepared internally. Details of the Social Impact Assessment are contained in Indicator 3.4.2 below.</p> <p>The mill had established Environmental Impact Assessment (EIA) procedure and has been documented as per Environmental Aspect and Impact Assessment Form (EIA-PPOM-2022) dated 15/09/2022. All significant impacts have been determined and mitigation plan was developed thereafter as per document. Among of activities discussed in the EIA were:</p> <ol style="list-style-type: none"> 1. Chemical mixing and storage 2. CPO storage 3. Lab operation 4. Composting Plant 5. POME Treatment 6. Waste handling 7. Storage of hydrocarbon 8. Diesel Engine 	<p>Complied</p>
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		<p>Similarly, for the estates the EAI was available for each activity reviewed for the year of 2022. The EIA has been prepared by assistant Manager, Reviewed by Environmental Officer and ERA approval by Manager. This aspect and impact include activities among sample estates:</p> <p><u>Pasir Panjang Estate reviewed on 04/02/2022</u></p> <ol style="list-style-type: none"> 1. Application of EFB Compost 2. Clinic 3. Compound 4. Harvesting 5. Workshop 6. Manuring 7. Office 8. Nursery 9. Schedule Waste 10. Storage 11. Chemical Application 	
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		<p>12. Use of Machine And Tractor</p> <p>13. Construction</p> <p>14. Bio compost</p> <p><u>Bukit Kelompok Estate reviewed on 30/08/2022</u></p> <ol style="list-style-type: none"> 1. Clinic 2. Compound 3. Harvesting 4. Workshop 5. Manuring 6. Office 7. Scheduled waste 8. Storage 9. Chemical Application 10. Use of Machine and contractor <p>Stakeholder Meeting were conducted by complex basis. Refer Minit Mesyuarat Perjumpaan Dan Sesi Taklimat Bersama Pihak</p>	
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		Berkepentingan Kompleks Tunjuk Laut (Southern Region) dated 14/11/2022.	
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>There was evidence that the Social Impact Assessment (SIA) as well as the Social Management and Monitoring Plans for Pasir Panjang Mill and its supply base have been developed with the participation of the affected stakeholders. These Plans were developed by obtaining feedback and inputs from workers via NUPW, WOW meetings and worker interviews. Among the stakeholders who participated were harvesters, mandores, general workers, sprayers, charginan, boilerman, weighbridge operator, WOW and Union members.</p> <p>When developed with the stakeholders, several areas for improvement were identified. This was followed by recommendations for social improvement, action plan, person in charge and monitoring.</p> <p>Among the areas for improvement included:</p> <ul style="list-style-type: none"> a. Floods: To ensure flood preparations are in place in view of the adverse weather pattern as predicted by METS Malaysia. b. Housing: Transformative Strategic Action Plan has been devised improve better housing conditions for employees which include demolishing pre-1990 houses and building new ones in accordance with the Labour Office specifications. 	Complied

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		<p>c. Ways to increase income: Estates and Mill give opportunities to workers who wish to earn extra income by offering overtime work.</p> <p>d. Health and safety: Regular mosquito fogging exercises, free medical treatment for workers and their dependants, providing mental health care for those affected by Covid-19 pandemic.</p> <p>e. Internet access: Improving internet accessibility at the estates and mill, including the linesite.</p> <p>Pasir Panjang Certification Unit has established Environmental Management Plan and was made available in the estates/mill for review. Internal stakeholders (estate and mill team) were consulted for during review process especially for those interact directly with the activities at estates and mill’s workstation. The issue on environmental plan also being discussed in the Stakeholders Meeting. Refer Stakeholder Meeting Minutes dated 14/11/2022. Result of participation will be considered as part of SEIA review process. If there is any environmental incidents or changes of process (new installation/modification, SEIA will be reviewed to evaluate the environmental impact.</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>Evidence was available that the Social Action and Monitoring Plan are being implemented, reviewed and updated at least annually.</p> <p>Sighted and verified during the audit were the following updates:</p>	Complied

		<p>Pasir Logok Estate: 30/11/2022 Pasir Panjang Mill: 01/12/2022 Pasir Panjang Estate: 01/12/2022 Siang Estate: 01/12/2022</p> <p>The management plan established based on operation with significant impact to the environment. The management plan was reviewed annually. The management plan stated the environmental issue, mitigation actions, monitoring plan and person responsible for monitoring implementation. Various management plan related environment as below:</p> <ul style="list-style-type: none"> • Reduction of Pollution & Emission Management Plan 2022 • Biodiversity Improvement Plan 2022 • Waste & Pollution Management Plan 2022 • Water Management Plan 2022 	
<p>Criterion 3.5: A system for managing human resources is in place.</p>			
<p>3.5.1</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>Documentation of employment procedures used by Kulim (Malaysia) Berhad were available under 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; and 	<p>Complied</p>

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		<ul style="list-style-type: none"> 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. <p>These SOPs are documented and kept at the office premises and available to all workers and their representatives, where applicable.</p>	
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Pasir Panjang Mill and its supply base were able to demonstrate the implementation of its own employment procedures, including recruitment. Records were also maintained showing the implementation of the recruitment employment procedures. Sighted during the audit were the following recruitment records:</p> <ul style="list-style-type: none"> Bukit Kelompok Estate: Worker No E770002594's job application dated 23/05/2022, medical examination and "fit for work" letter from Estate Medical Assistant dated 23/05/2022, job offer letter dated 30/05/2022, acceptance of job offer on 31/05/2022, and signing of employment contract dated 02/06/2022. Pasir Panjang Mill: Worker No. E440000330's job application dated 19/09/2022, medical examination dated 07/11/2022 by the Pasir Panjang Mill Medical Assistant, job offer dated 08/11/2022, and the signing of contract dated 08/11/2022. Siang Estate: Worker No. E910001670's job application, work experience and qualifications, medical examination carried out 	Complied

		by APM Healthcare dated 29/10/2021, and employment contract signed on 01/11/2021.	
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>HIRARC was available for all operations within the mill and estates to identify the hazards, assess and recommended control measures to minimize the risks. Among the HIRARC sampled were Harvesting of FFB, P&D Control, Landfill Activities, manuring and Spraying Activities. Risks were also assessed in accordance with legal requirements and its recommendations were implemented as below.</p> <p><u>Pasir Panjang POM</u></p> <ol style="list-style-type: none"> 1. Chemical Health Risk Assessment was done in compliance with USECHH Regulation 2000. The assessment was conducted by Kulim Safety Training and Services Sdn Bhd on 27/11/2018. The CHRA Report (Report Number: HQ/14/ASS/00/350-2018/016) was available for verification. 2. Medical Surveillance for 2022 was conducted for 6 mill workers on 15/08/2022 for workers exposed to n-hexane, pesticides and hazardous fumes, as per recommendation in the CHRA. The results indicated that all were fit to work. 3. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) Regulations 2019. The assessment was conducted by Kulim Safety Training 	Complied

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		<p>and Services Sdn Bhd on 04/02/2020. The NRA Report (Report Number: JKPP HIE 127/5/3-1 (No.169) – 2020/002) was available for verification.</p> <p>4. Audiometric test was conducted by PAC Testing & Consulting Sdn. Bhd for 80 mill workers on 28/03/2022. The results indicated 2 workers were diagnosed with Standard Threshold Shift (STS) and required to undergo retest within 3 months. A retest was conducted, and results were available for verification. Management have reported to JKPP via JKPP 7 for those with confirmed hearing impairments.</p> <p><u>Pasir Logok Estate</u></p> <p>1. Chemical Health Risk Assessment (CHRA) was done in compliance with USECHH Regulation 2000. The assessment was conducted by QMSPRO Sdn Bhd on 25/04/2018 – 13/08/2018. The CHRA Report (Report Number: JKPP HQ/03/ASS/00/154-2018/048) was available for verification.</p> <p>2. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) Regulations 2019. The assessment was conducted by NRA Assessor (JKPP Registration Number: HQ/18/PEB/00/00014) on 15/12/2021. The NRA Report (Report Number: HQ/18/PEB/00/00014 – 2021/012) was available for verification.</p>	
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		<p>3. Audiometric test was conducted by BP Healthcare Group for 4 estate workers on Dec 2022 based on the requirements in the NRA. The results indicated workers were diagnosed to have normal hearing (1) and Hearing Loss (3).</p> <p><u>Siang Estate</u></p> <p>1. Chemical Health Risk Assessment was conducted to assess the use of hazardous chemicals in the estate. The CHRA Assessment was conducted on 27/02/2018 – 13/08/2018 by QMSPro Sdn Bhd. The CHRA Report (JKKP HQ/03/ASS/00/154-2018/031) was available for verification.</p> <p>2. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) Regulations 2019. The assessment was conducted by Mr. Lee Kean Heng (JKKP Registration Number: HQ/18/PEB/00/00014) on 01/12/2021. The NRA Report (Report Number: HQ/18/PEB/00/00014 – 2021/032) was available for verification.</p> <p>3. Audiometric Screening was conducted for selected Siang Estate workers in compliance with the recommendations in the NRA. A total of 8 workers were screened in December 2021. The results indicated all 8 workers had hearing loss.</p> <p><u>Pasir Panjang Estate</u></p> <p>1. CHRA Assessment was conducted by QMSPRO Sdn Bhd on 24/04/2018 – 13/08/2018 to assess the use of hazardous</p>	
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		<p>chemicals in the estate. The CHRA Report (Report Number: JKPP HQ/03/ASS/00/154-2018/047) was available for verification.</p> <ol style="list-style-type: none"> 2. Medical Surveillance was conducted for 47 workers exposed to hazardous chemicals in the estate. The medical surveillance was conducted on 21/07/2022 for 27 workers. 3 workers were declared unfit to work as per report and have been removed by the management from spraying works. 3. Baseline Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) Regulations 2019. The assessment was conducted by DOSH certified assessor, Mr. Lee Kean Heng (JKPP Registration Number: HQ/18/PEB/00/00014) on 13/12/2021. The assessment report (HQ/18/PEB/00/00014 – 2021/009) was available for verification. 4. Audiometric Test was conducted based on recommendations in the NRA. 1 worker was tested on 03/12/2022 and deemed to have hearing loss and requires medical examination by OHD. 	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Annual H&S plan established by each Operating Unit are mostly implemented through Annual Training Program 2022 to address the identified health and safety risks. The emphasis is on safe work by providing</p> <ul style="list-style-type: none"> ▪ Knowledge and skills needed to do their work safely and avoid creating hazards that could place themselves or others at risk. 	Non-compliance

		<ul style="list-style-type: none"> ▪ Awareness and understanding of workplace hazards and how to identify, report, and control them. ▪ Specialized training, when their work involves unique hazards. <p>Besides formal classroom training other means include on-the-job training and worksite demonstrations to effectively convey safety concepts, ensuring understanding of hazards and their controls, and promoting good work practices.</p> <p>The safety performance of each Operating Unit is monitored via:</p> <ul style="list-style-type: none"> • Internal Audit conducted by the Kulim Head office Sustainability Palm Oil Department. • Workplace inspection by site OSH Committee. • Direct involvement of supervisor and rounds by Asst Manager. • Safety occurrence reporting. • Health / medical surveillance. • Chemical exposure monitoring, and <p>The results of monitoring are discussed at meetings and informed to employees, and where applicable, appropriate corrective actions are taken.</p> <p>Nevertheless, the effectiveness of the Safety Plans was not monitored adequately.</p>	
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		<p><u>Siang Estate</u></p> <ol style="list-style-type: none"> 1. The Staff and Premix Attendant entered the Chemical Store without using appropriate PPE such as Respirator. This was against the procedures placed in front the stores which require any personals entering the chemical store to wear appropriate PPEs. 2. First Aid Box at the Workshop did not have sufficient items such as Yellow Lotion. The Box also did not have the list of required items. It was verified that the "Campuran Iodin" and "Yellow Lotion" was not equipped in the box as stated in the Panduan Kerja Selamat; Doc Number: Kulim/PKS/OSH-1; Arahan Untuk Mengurus Peti Pertolongan Cemas. 3. The Acetylene Tank used for welding works were not equipped with Flashback Arrestor. The HIRARC was verified and seen to have not identified the risks and hazards associated to gas leakages while operating oxygen and acetylene tanks. 4. Mineral Water bottle was stored with hydraulic oil and placed on the tractor without any relabelling. It was not in line with OSH (USECHH) Regulations 2000, Part VI Labelling & Relabelling; 21, (2) When the labels mentioned in sub regulation (1) are removed, defaced, modified or altered while the chemical hazardous to health is being used at the place of work, the employer shall re-label the chemical. 	
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		<p>5. During site visit at Siang Estate, Harvesting Gang, Field P06/01, it was found that 2 harvesters was not wearing safety helmet while harvesting the FFB. It was no in line with Prosedur Kerja Selamat (1) Memotong Buah Sawit dated 01/03/2021 Reference No: KULIM/PKS/OSH-1 Section 1.1.4 Peralatan Perlindungan Keselamatan Peribadi(PPE) Topi Keselamatan, Kasut Getah, Sarung Tangan Bersesuaian Dan Cermin Mata Keselamatan.</p> <p>6. During site visit at Siang Estate, Harvesting Gang, Field P06/01, it was found that Mechanical Buffalo Driver was wearing rubber shoes. It was no in line with Prosedur Kerja Selamat (6) Pemanduan Badang/Mechanical Buffalo (MB) dated 01/03/2021 Reference No: KULIM/PKS/OSH-1 Section 6.1.4 Peralatan Perlindungan Keselamatan Peribadi (PPE) Topi Keselamatan, Kasut Keselamatan, Baju Pantul Cahaya Dan Cermin Mata Keselamatan.</p> <p>Thus, Major NC was raised.</p>	
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>The Annual Training Program 2022 was established that covers mainly Health and Safety but extends to include all aspects of RSPO P&C and Supply Chain Certification Standard (SCCS).</p> <p>Means implemented by Mahamurni Plantation to assess understanding of participants include:</p>	Complied

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	<p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> • Participants completing post-training evaluation/feedback form and give suggestions; • Learners engagement such as interactive quizzes; • Knowledge acquisition and behavioural application rated by immediate supervisor at workplace post training attended. <p>Random interviews with workers showed that they understood what RSPO is, the several subsidiaries' policies, what does their work/job SOP states and the consequences if deviated, the need to put on PPE and demonstrate donning PPE and when it should be changed, the use of fire extinguishers, understanding workplace hazards, risks and needed control measures, Covid-19 Safe Practices. etc.</p>									
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Training records are maintained by each Operating Unit. Sample some records at each Operating Unit as follows:</p> <p>Pasir Panjang POM</p> <table border="1" data-bbox="1137 928 1917 1160"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Company Policy Training</td> <td>01/08/2022</td> </tr> <tr> <td>Water Treatment Training</td> <td>24/07/2022</td> </tr> <tr> <td>Effluent Sampling Training</td> <td>24/07/2022</td> </tr> </tbody> </table>	Training	Date	Company Policy Training	01/08/2022	Water Treatment Training	24/07/2022	Effluent Sampling Training	24/07/2022	Complied
Training	Date										
Company Policy Training	01/08/2022										
Water Treatment Training	24/07/2022										
Effluent Sampling Training	24/07/2022										

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		Chemical Handling Training	23/06/2022	
		PPE Usage Training	22/05/2022	
		PCD Cleaning Training	30/10/2022	
		FFB Grading Training	31/01/2022	
		Pasir Logok Estate		
		Training	Date	
		Harvesting Training	07/11/2022	
		Workshop Training	0/04/2022	
		PCD Cleaning Training	17/05/2022	
		Waste Cleaning & Landfill Training	24/05/2022	
		Fogging Training	13/09/2022	
		IPM Training	03/11/2022	
		Elephant Incursion patrolling Briefing	08/11/2022	
		Pasir Panjang Estate		

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Training	Date
Harvesting Training	10/08/2022
Landfill Training	12/05/2022
IPM Training	12/10/2022
Working at Height Training	21/09/2022
Elephant Fence Maintenance Training	13/07/2022
Grass-cutting Training	11/05/2022
PPE Usage Training	29/03/2022
Siang Estate	
Training	Date
Waste Cleaning & Landfill Training	08/02/2022
Water Treatment Training	05/06/2022
Fertilizer Handling Training	09/02/2022
Fogging Training	15/02/2022

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		Beneficial Plant Training	07/09/2022	
		Working at Height (Ramp) Training	29/03/2022	
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>	Supply chain training carried out for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training conducted on 22/08/2022 attended by Mill representatives.		Complied
<p>Criterion 3.8: Supply chain requirement for mills</p> <p>(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>	Pasir Panjang Palm Oil Mill only receives certified FFB from its own certified supply base and diverted crop from its sister estates. Therefore, Pasir Panjang POM uses 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.		Complied

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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>Pasir Panjang Palm Oil Mill only receives certified FFB from own certified supply base and diverted FFB from its sister estates within the same parent company which are RSPO certified. Therefore, qualifies for the Identity Preserved supply chain system and module. Hence this indicator is not applicable.</p>	Not Applicable
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&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 production for the assessment period is available in table 10 of this summary report.</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:</p> <p>Members ID: RSPO_PO1000005256</p> <p>Member category: Oil Mill</p>	Complied

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3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard. 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><u>Document Procedure</u></p> <p>The SCCS Operations are guided by 2 operating procedures as follows.</p> <ol style="list-style-type: none"> 1. Mahamurni Plantations Sdn Bhd; Procedure Title: CSPO & CSPK Supply Chain; Procedure No: MKTG 04; Document Date: January 2021; Revision; 02. 2. Sustainable Management system – Traceability; Document Number: SQD/SMS/2.1; Document Date: 17/02/2022; Issue No: 01; Rev Number; 06. <ul style="list-style-type: none"> – Seen the records that included in the procedure are as below Weighbridge tickets, Training records, Internal audit report, Invoice and contracts, Delivery and storage records and Daily Production Report. – Training records for RSPO Supply Chain & Stamping was sighted where the training was conducted on 22/08/2022 for the critical control point responsible person such as Weighbridge Operators and Security Guards. Seen the attendance list and interviewed with the attendees confirmed that they are understand the procedure. – Head of each operating unit appointed as person responsible for all certification inclusive of RSPO SCCS. Responsibility of the 	Complied
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		<p>person-in-charge has clearly stated in the appointment letter, SQD/ADMIN/019/21 dated 15/09/2021.</p> <ul style="list-style-type: none"> - Mahamurni Plantations Sdn Bhd has developed Sustainable Management system – Traceability; Document Number: SQD/SMS/2.1; Document Date: 17/02/2022; Issue No: 01; Rev Number; 06, which has covered the process of incoming of FFB and ensuring no contamination in the IP mill. 	
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. 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>Mahamurni Plantations Sdn Bhd has developed Internal Audit Procedure (Doc. No.: SQD/SMS/3.2, Issue No.: 1, Rev. No.: 0 dated 01/08/2020) 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).</p> <p>The latest internal audit was carried out on 13/11/2022 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. The outcomes of the internal audits and all actions taken to correct non-conformities were discussed in the management review conducted on 14/11/2022.</p>	Complied

<p>3.8.7</p>	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 	<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> <p><u>FFB from Own Supply Base</u></p> <ul style="list-style-type: none"> 1. FFB despatch no. - DB A No. 11360 2. Estate’s names – Pasir Logok Estate 3. Date of delivery – 30/08/2022 4. Field No. - Field P10 5. Lorry No – JUY 9020 6. Weight – 10,670 mt 7. WB ticket: 135516 8. Traceability Identification - RSPO certified FFB (RSPO 657192) <p>Diversion from other certified management unit,</p> <p>- Sindora certification unit (RSPO 612392)</p> <ul style="list-style-type: none"> 1. FFB despatch no. - DB A No. 48517 2. Estate’s names – Sungai Papan Estate 3. Date of delivery – 14/11/2022 	<p>Complied</p>
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		<p>4. Field No. - Field P15, P16 and P09A</p> <p>5. Lorry No – JUB 2602</p> <p>6. Weight – 35,460 mt</p> <p>7. WB ticket: 139814</p> <p>8. Traceability Identification - RSPO certified FFB (RSPO 612392)</p> <p>The mill management are ware that they are to inform the CB if there are any overproduction of certified tonnage. It was verified that there was no overproduction in certified tonnage recorded in the mill.</p> <p>Mechanism for handling non-conforming FFB and/or documents were documented in Sustainable Management system – Traceability; Document Number: SQD/SMS/2.1; Document Date: 17/02/2022; Issue No: 01; Rev Number; 06 – Non-Conformity and Potential Non-Conformity Product(s).</p>	
<p>3.8.8</p>	<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 palm products (for example, delivery notes, shipping documents and specification documentation):</p> <p>a) The name and address of the buyer;</p>	<p>Pasir Panjang Palm Oil Mill ensured the required information is available in document form.</p> <p>Sampled of CPO contract: CPOIP-M22032 dated 13/07/2022, quantity 400 mt (delivery month – July 2022)</p> <ol style="list-style-type: none"> 1. The name and address of the buyer: XXX 2. The name and address of the seller; Pasir Panjang Oil Mill 3. The delivery date: 09/08/2022 	<p>Complied</p>

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<ul style="list-style-type: none"> 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"> 4. The date on which the documents were issued: 09/08/2022 5. RSPO Certificate Number: RSPO 657192 6. A description of the product, including the applicable supply chain model: Crude Palm Oil (CSPO) RSPO IP 7. The quantity of the products delivered: 41,390 mt 8. Any related transport documentation: Loading Note – C10423 9. A unique identification number: Weighbridge Ticket Number: C10423 <p>Sampled of PK contract: MPOK 2115 IP dated 21/06/2022, quantity 300 mt (delivery month – Jun 2022)</p> <ul style="list-style-type: none"> 1. The name and address of the buyer: XXX 2. The name and address of the seller: Pasir Panjang Oil Mill 3. The delivery date: 14/07/2022 4. The date on which the documents were issued: 14/07/2022 5. RSPO Certificate Number: RSPO 657192 6. A description of the product, including the applicable supply chain model: Kernel (CSPK) RSPO IP 7. The quantity of the products delivered: 31,060 mt 	
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		<p>8. Any related transport documentation: Loading Note – K02426</p> <p>9. A unique identification number: Weighbridge Ticket Number: K02426.</p>	
<p>3.8.9</p>	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p>	<p>No CPO and PK process, bulking facilities outsourced by the mill. Transporter for PK was assigned by buyer. For CPO, sample of contract agreement with a few contractors as per below:</p> <ol style="list-style-type: none"> 1. Teo Tuan Kwee; Contract Number: MPSB/G1/2 (2020) (TTK) dated 15th June 2020. Date commencement: 1st June 2020, completion date: 31st May 2023. 2. Semai Setia Transport, MPSB/G1/6/2(2020) (SS) dated 15th June 2020. Date commencement: 1st June 2020, completion date: 31st May 2023. <p>Under clause 6 on the contract;</p> <p><i>For contract operation in RSPO, ISCC and MSPO certified mills or estates, the contractor is required to comply with all RSPO, ISCC and MSPO requirements related to the execution of the contract.</i></p>	<p>Complied</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.		
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 November 2022	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.	Verified that there is no change of names and contract details of transporter for the physical handling of RSPO certified oil palm products. The mill was aware that the CB are to be informed if there are any changes of updates.	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p>	<p>1. 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"> a. Dispatch of CPO/PK delivery order <ul style="list-style-type: none"> - CPO Despatch: Weighbridge Ticket Number: C10423 - PK Despatch: Weighbridge Ticket Number: K02426 b. Monthly Production Report c. FFB Despatch Report from supplying estate <ul style="list-style-type: none"> - Pasir Logok Estate: DB A No. 11360 	Complied

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	<p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<ul style="list-style-type: none"> - Sungai Papan Estate: DB A No. 48517 d. Training records - 22/08/2022 e. FFB Transaction records <p>2. 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>3. 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>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. Extraction average from January 2022 to November 2022 were 20.71% (OER) & 5.24% (KER).</p>	<p>Complied</p>

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>	No incoming of uncertified FFB and mill only process RSPO certified FFB from Mahamurni Plantations Sdn Bhd group estates. Hence there are no uncertified products being produced, stored or transported for this certification unit.	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>	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 11A.	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 Pasir Panjang 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	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>	<p>Kulim (Malaysia) Berhad has stated the member's awards/certification with regard to RSPO in the company's website and annual report with the use of trademark logo. 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 Pasir Panjang Palm Oil Mill. The facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.</p>	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 with the use of trademark logo. 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 Pasir Panjang Palm Oil Mill. The facility is aware with the requirements of the RSPO Rules on Market Communications and Claims. The use of trademark logo were in compliance with the RSPO Trademark License.</p>	Complied

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4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	The company does not make any statement that may misleading to the consumers to believe that RSPO membership by itself implies that selling of RSPO-certified oil palm products by verified through the website.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	The communication that made via website is consistent, clear and does not mislead the consumer and stakeholders as to the certified content of oil palm products in their own products.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	There was no RSPO corporate logo has been used verified through website, notice board, business card, shipping documentation and procurement/ purchasing document.	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer. Verified the weighbridge tickets to buyer where claim of CSPO (Identity Preserved) was stamped on the tickets.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that the product is CSPO (Identity Preserved) with RSPO certificate number: RSPO 657192.	Complied

5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	Pasir Panjang Palm Oil Mill is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable
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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	Oil palm content is 100% CPO and claim as RSPO IP-certified. All infeed material (FFB) is RSPO certified.	Complied

	<p>requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p>		
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. 	<p>Pasir Panjang POM is not use RSPO label in its product (CPO & PK). This is confirmed during the site visit observation and interview with the mill management.</p>	<p>Complied</p>
Messaging (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- 	<p>As to date, no RSPO trademark used on the RSPO products. Kulim (Malaysia) Berhad has stated the member's history with regard to RSPO in the company's website and annual report without the trademark logo used. Pasir Panjang POM is not use RSPO label in its product (CPO & PK). This is confirmed due site visit observation and interview with the mill management.</p>	<p>Complied</p>

	pack communications, the RSPO trademark can be printed anywhere on the pack.		
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>The Policy to respect human rights is documented in Kulim (Malaysia) Berhad’s Sustainability Policy dated 1/10/2021 signed by its Managing Director. Among others, this Policy states the 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 stakeholders during stakeholder meeting on 04/11/2022, and to all levels of workforce during the following briefings:</p> <p>Bukit Kelompok Estate: 06/01/2022 Pasir Logok Estate: 02/12/2022 Pasir Panjang Mill: 01/08/2022 Pasir Panjang Estate: 11/05/2022 Siang Estate: 10/08/2022</p>	Complied

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4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>There is no evidence of any use of violence or the instigation of violence within Pasir Panjang Mill and its supply base. This was further verified during interviews held with the 32 external stakeholders comprising contractors, suppliers and service providers, and 28 employees.</p>	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>For purposes of dealing with complaints and grievances, the unit of certification complies with document known Grievance Procedure Doc No. SQD/SMS/4.1 dated 1 August 2020. This is a mutually agreed document that deals with complaints and grievances. Anonymity of complaints is assured under Clause 5.8 which states that complainants' anonymity would be respected and protected if requested. In addition, the unit of certification also is bound by its holding company's Sustainability Policy which states that it respects, supports and protects international human rights against violence, threats, all forms of retaliation, and effective elimination of all forms of violation of human rights which include against HRD, whistle-blowers, complainants and community spokespersons.</p>	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 are given usually during morning muster which is attended by workers, mandores, field supervisors, managers and assistant managers. The briefings are given verbally so that any illiterate parties can understand. Should there be foreign workers who are not conversant in the national language, translations are provided by the</p>	Complied

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		<p>respective workers’ representative. This include translating procedures related to complaints and grievances. Workers interviewed during the audit confirmed their understanding of the briefings on complaints and grievance procedures. Briefings on grievance procedure were given as follows:</p> <p>Bukit Kelompok Estate: 22/04/2022</p> <p>Pasir Logok Estate: 28/06/2022</p> <p>Pasir Panjang Mill: 16/05/2022 and 01/06/2022</p> <p>Siang Estate: 17/02/2022</p> <p>Pasir Panjang Estate: 09/01/2022</p>	
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>During this audit, none of the Complaints Book contains anygrievances from external stakeholders.</p> <p>Sighted during the audit were written complaints received from workers who wanted repairs carried out to their respective house at the linesite. The complaints book also contained status of repair works done which were duly acknowledged by the workers who submitted the complaints. Sampled written complaints showed that the repairs were generally carried out within one week, which is a reasonable timeframe..</p>	Complied
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to</p>	<p>The option of access to independent legal and technical advice is available Clause 5.5 of Grievance Mechanism Doc. No. SQD/SMS/4.1</p>	Complied

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	<p>choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>Issue No. 1 dated 1 August 2020 Conflict resolution mechanism is available under. This mechanism provides an option for parties to engage independent legal, technical advice and third-party mediator.</p>											
<p>Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.</p>													
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>Evidence was available that contributions to local development was made based on results of requests received from and consultation with the respective communities. This include providing job opportunities to suitable local communities. For example approximately 80% of Pasir Panjang Mill's employees are from the nearby areas. In addition, Pasir Logok Estate provides a school van to transport workers' children to SK Felda Tenggara Selatan. SK Tunjuk Laut and Sekolah Agama Tunjuk Laut receive in-kind benefits from Pasir Panjang Estate in the form of electricity and water supplies to the schools.</p>	Complied										
<p>Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>													
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>It was verified that there are no overlapping claims by the local community or indigenous peoples. Sampled were the following copies of land titles which show ownership/right to use were sighted and verified as follows:</p> <table border="1" data-bbox="1137 1109 1926 1200"> <thead> <tr> <th>Estate/Mill</th> <th>HSD & PTD No:</th> <th>Hectarage (ha)</th> <th>Lease duration</th> <th>Issued to</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Estate/Mill	HSD & PTD No:	Hectarage (ha)	Lease duration	Issued to						Complied
Estate/Mill	HSD & PTD No:	Hectarage (ha)	Lease duration	Issued to									

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		Pasir Panjang Estate	HSD 32182 No Lot PTD 401	1609.869	99-years from 17/09/2013 to 16/09/2112	Johor Corporation	
		Bukit Kelompok Estate	HSD 32183 No PT PTD 402	1055.629	60-years from 1/04/2010 to 31/03/2070	Johor Corporation	
			HSD 32184 No PTD 403	144.2 ha	60-years from 1/04/2010 to 31/03/2070	Johor Corporation	
		Siang Estate	HS(D) 33258 No. PTD 532	3413.98	99-year lease from 24/01/1988 to 23/01/2087	Mahamurni Plantations Sdn Bhd	
		Pasir Panjang Estate	H.S.(D): 35107 No. PTD 558	1609.869 ha	99-year lease from 17/09/2013 to 16/09/2112	Mahamurni Plantations Sdn Bhd.	

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		<table border="1"> <tr> <td>Pasir Panjang Mill</td> <td>13 ha on Pasir Panjang land</td> </tr> </table> <p>Sighted also were receipts for the following annual quit rent payments in 2022:</p> <ul style="list-style-type: none"> a. PTD 403 (Receipt F38990 dated 31/05/2022) b. PTD 402 (Receipt 0038991 dated 31/05/2022) c. PTD 401 (Receipt F38992 dated 31/05/2022). d. PTD 558 (F 0174439 dated 31/05/2022). 	Pasir Panjang Mill	13 ha on Pasir Panjang land	
Pasir Panjang Mill	13 ha on Pasir Panjang land				
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, there was no evidence of any dispute or overlapping land claim with any previous owner, occupants or affected communities. 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, there was no evidence of any dispute or overlapping land claim with any previous owner, occupants or affected communities. 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, there was no evidence of any dispute or overlapping land claim with any previous owner, occupants or affected communities. 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 status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute or overlapping land claim with any previous owner, occupants or affected communities. Therefore, this indicator is not applicable.	Not Applicable
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, there was no evidence of any dispute or overlapping land claim with any previous owner, occupants or affected communities. 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, there was no evidence of any dispute or overlapping land claim with any previous owner, occupants or affected communities. Therefore, this indicator is not applicable.	Not Applicable

4.4.5	<p>(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute or overlapping land claim with any previous owner, occupants or affected communities. Therefore, this indicator is not applicable.</p>	Not Applicable
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute or overlapping land claim with any previous owner, occupants or affected communities. Therefore, this indicator is not applicable.</p>	Not Applicable
<p>Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting within Bukit Kelompok, Pasir Logok, Siang, and Pasir Panjang Estates. Evidence of rightful and legal land ownership are as per Indicator 4.4.1 above. There is no evidence of other legal, customary or user rights. Therefore, this indicator is not applicable.</p>	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</p>	<p>There is no new planting within Bukit Kelompok, Pasir Logok, Siang, and Pasir Panjang Estates. Evidence of rightful and legal land ownership are as per Indicator 4.4.1 above. There is no evidence of other legal, customary or user rights. Therefore, this indicator is not applicable.</p>	Not Applicable

	<p>access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>		
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>There is no new planting within Bukit Kelompok, Pasir Logok, Siang, and Pasir Panjang Estates. Evidence of rightful and legal land ownership are as per Indicator 4.4.1 above. There is no evidence of other legal, customary or user rights. Therefore, this indicator is not applicable.</p>	<p>Not Applicable</p>
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>There is no new planting within Bukit Kelompok, Pasir Logok, Siang, and Pasir Panjang Estates. Evidence of rightful and legal land ownership are as per Indicator 4.4.1 above. There is no evidence of other legal, customary or user rights. Therefore, this indicator is not applicable.</p>	<p>Not Applicable</p>
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>There is no new planting within Bukit Kelompok, Pasir Logok, Siang, and Pasir Panjang Estates. Evidence of rightful and legal land ownership are as per Indicator 4.4.1 above. There is no evidence of other legal, customary or user rights. Therefore, this indicator is not applicable.</p>	<p>Not Applicable</p>

	- Minor compliance -		
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	There is no new planting within Bukit Kelompok, Pasir Logok, Siang, and Pasir Panjang Estates. Evidence of rightful and legal land ownership are as per Indicator 4.4.1 above. There is no evidence of other legal, customary or user rights. Therefore, this indicator is not applicable.	Not Applicable
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	There is no evidence that new lands were acquired for Bukit Kelompok, Pasir Logok, Siang, and Pasir Panjang Estates after 15 November 2018 as a result of expropriations without consent.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	There is no evidence that new lands were acquired for Bukit Kelompok, Pasir Logok, Siang, and Pasir Panjang Estates acquired in areas inhabited by communities 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 -	A Manual known as Property Management Department Manual Procedure Doc. No. KMB/PMD/MP/05 Rev No. 4 Dated 09/06/2020 contains procedures on investigating any claims, identification of legal, customary or user rights, as well as the procedure for	Complied

		identifying those entitled to compensation. A flow chart at the end of the Manual also specifies the steps to be taken in such situations.	
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	A Manual known as Property Management Department Manual Procedure Doc. No. KMB/PMD/MP/05 Rev No. 4 Dated 09/06/2020 contains procedures on investigating any claims, identification of legal, customary or user rights, as well as the procedure for identifying those entitled to compensation. A flow chart at the end of the Manual also specifies the steps to be taken in such situations. As of the date of this audit, there has been no records of any customary, legal or user right claims.	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	Pasir Panjang POM does not have any arrangements for scheme smallholdings. Therefore, this indicator is not applicable.	Not Applicable
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	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.	Complied
<p>Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			

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4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation is in place and is contained in a Manual known as Property Management Department Manual Procedure Doc. No. KMB/PMD/MP/05 Rev No. 4 Dated 09/06/2020</p>	Complied
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p> <p>- Critical (Major) compliance -</p>	<p>A procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented in a Manual known as Property Management Department Manual Procedure Doc. No. KMB/PMD/MP/05 Rev No. 4 Dated 09/06/2020.</p> <p>The procedure contained in the Manual was made known and briefed to stakeholder during stakeholder meeting on 14/11/2022.</p>	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>Based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. During interviews with external stakeholders such as canteen operators, contractors and suppliers, namely owner-operators of Bukit Payung sundry shop, sundry shop owners at Pasir Panjang Estate, suppliers (Kejuruteraan Cabaran, Bina Tab Sdn Bhd, school bus driver, FFB and CPO transporters (Lim King Guan, Mirzafil Sdn Bhd), they confirmed that the unit of certification has given them business opportunities. They in turn, employ local communities which also directly benefit from these job opportunities. In addition, at least 10 Pasir Panjang Mill workers interviewed confirmed that they are from within the nearby villages and towns.</p>	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.	Complied
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. Pasir Panjang POM and its supply base were not newly acquired units. Therefore, this indicator is not applicable.	Complied
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.	Complied

4.8.4	<p>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).</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>	Complied
<p>Principle 5: Support smallholder inclusion</p>			
<p>Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
5.1.1	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	<p>Pasir Panjang Palm Oil Mill is an Identity Preserved Mill. The Mill processes only FFB from its own estates namely Pasir Panjang Estate & Bukit Payung Division, Tunjuk Laut Estate, Siang Estate, Bukit Kelompok Estate and Pasir Logok Estate and diverted crop from Sindora Certification Unit (Sungai Papan Estate). Therefore, this Indicator is not applicable.</p>	Not Applicable
5.1.2	<p>(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).</p> <p>- Critical (Major) compliance -</p>	<p>Not applicable as there is no FFB sourced from smallholders.</p>	Not Applicable
5.1.3	<p>(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>Not applicable as there is no FFB sourced from smallholders</p>	Not Applicable

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5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	Not applicable as there is no FFB sourced from smallholders	Not Applicable
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	Not applicable as there is no FFB sourced from smallholders	Not Applicable
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	Not applicable as there is no FFB sourced from smallholders	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 Pasir Panjang Palm Oil Mill certification unit. Summary of stamping records as follows:</p> <p>1. Weighbridge 1; Receipt Number: 051096; Serial Number: 2105038BC1; Safety Sticker Number: DE18-001575; Description: MPK (E) 80,000 kg WEIGHCOM; Date of Calibration: 04/08/2022.</p> <p>Weighbridge 2; Receipt Number: 1742325; Serial Number: T11510075; Safety Sticker Number: 2.1K Q027235; Description:</p>	Complied

		Vehicle Weighbridge V7200 80,000 kg; Date of Calibration: 29/03/2022.	
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	No independent smallholder at Pasir Panjang Palm Oil Mill Certification Unit. Thus, this indicator is not available.	Not Applicable
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	No independent smallholder at Pasir Panjang Palm Oil Mill Certification Unit. Thus, this indicator is not available.	Not Applicable
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	There are no smallholders within the Unit of Certification. Therefore, this indicator is not applicable	Not Applicable
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial	There are no smallholders within the Unit of Certification. Therefore, this indicator is not applicable	Not Applicable

	competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -		
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	There are no smallholders within the Unit of Certification. Therefore, this indicator is not applicable	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	The mill received no crop from smallholders. The outside crop suppliers being invited in the stakeholders' meetings and briefing cum training are made in these sessions. Details as per minutes of meeting with the stakeholders dated 22/09/2022.	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	There are no smallholders within the Unit of Certification. Therefore, this indicator is not applicable	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(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.	The publicly available policies developed by the Company on non-discrimination and equal opportunities are available as follows: a) Business Policy	Complied

	<p>- Critical (Major) compliance -</p>	<p>b) Core Labour Standard c) People Policy</p> <p>These Policies emphasise on 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.</p> <p>Employment contracts and payslips of foreign and local workers were sampled for review. The terms of the employment contracts do not contain any discriminatory clauses. Payslips sampled also showed that workers are paid equal rates for the same types of work irrespective of gender and nationality. Please cross refer to Indicator 6.1.6 below. A Trade Union representative also confirmed during audit interview at Pasir Panjang Mill that there is no discrimination against union members.</p> <p>It was also observed during the audit, that foreign and local workers of the same grade were allotted the same type of housing. This was confirmed by the workers during audit interviews conducted with sampled workers from Pasir Panjang Mill, Pasir Logok Estate, Bukit Kelompok Estate, Siang Estate, and Pasir Panjang Estate. They further confirmed that they were all treated equally irrespective of nationality, gender, religion, union membership, etc, and accorded</p>	
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		equal opportunities to do overtime work to earn extra income, to attend relevant trainings, etc. .	
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>All sampled workers interviewed at the estates and mill confirmed that they have not faced any no form of discrimination.</p> <p>Contract dated 19/05/2022 signed between Kulim (Malaysia) Berhad and PT Hamparan Karya Insani (manpower supplier from Indonesia) states among others, that cost of workers’ transportation to the respective estates/mill will be borne by Kulim following Kulim’s ‘Zero Cost Policy’. No recruitment fees are imposed on any of the foreign workers, and this was further confirmed by foreign workers interviewed.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>Evidence was available that the process of recruitment, selection and hiring are based on skills, capabilities, qualities and medical fitness. This was evidenced when reviewing the files and recruitment records of the following workers:</p> <ol style="list-style-type: none"> 1. Bukit Kelompok Estate: Workers No E770002594, E700001591, E700002594, E700004595, E700005605. 2. Pasir Panjang Mill: Workers No. 951939, 952100, E440000025, E440000044, E440000058, E440000120. 3. Siang Estate: Worker No. E910001670, E910001644, E910001528, E910001301, E910001672. 	Complied

		4. Pasir Panjang Estate: E690000024, E6900001130, E6900001142, E6900001269, E6900001672.	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Interviews held with Medical/Health Assistants and six representatives of Women OnWards (WOW) confirmed that there are no female workers working in the laboratory, or in the field as manurers and sprayers at any of the estates/mill within the unit of certification. Based on records available, none of the female employees working at the estate and mill offices requested for pregnancy tests during the audit year.</p>	Complied
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>Women OnWards (WOW) is a committee in place at all the units within Pasir Panjang Mill and its supply base, and it functions as a gender committee. Membership is open to all female employees including employees' wives. WOW was set up to promote gender equality and empower women's knowledge and skills.</p> <p>Among the awareness given to members include issues discussed were sexual harassment, domestic violence, how to make complaints if there was a case, reproductive right and briefings on Company policies. Interviews conducted with WoW members confirmed their understanding of these issues.</p> <p>Sampled were the following WoW meetings minutes:</p> <p>Pasir Logok Estate dated 10/03/2022</p> <p>Pasir Panjang Estate dated 14/11/2022</p>	Complied

		Siang Estate dated 16/08/2022.	
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	<p>Pasir Panjang Mill and its supply base were able to demonstrate that that workers receive equal pay for the same work scope. Sampled were the following workers:</p> <ol style="list-style-type: none"> 1. Bukit Kelompok Estate: E770000820 (general worker, male, Malaysian), E770007673 (general worker, male, Bangladesh). 2. Pasir Panjang Mill: E440000310 (kernel operator, male, Malaysian), E440000198 (kernel operator, male, Indonesian). 3. Pasir Panjang Estate: E690000017 (field mandore, male, Malaysian), E690001141 (field mandore, female, Malaysian) 4. Pasir Logok Estate: E770001177 (general worker, male, Bangladesh), E770001171 (general worker, male, Indonesian). 5. Siang Estate: Passport No. C5722082 (tractor driver, male, Indonesian), Passport No. C7624390 (tractor driver, male, Indonesian). 	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	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in	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	Complied

	<p>national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc are contained in workers' employment contracts. Sampled were employment contracts for Malaysian and Indonesian workers which have been prepared in Bahasa Malaysia. For Bangladeshi workers, the contracts were in dual language, i.e., English and Bengali.</p> <p>Clause 9 of the employment contracts 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. Sighted during the audit at Pasir Panjang Mill was a marked copy of a contract with evidence of explanation having being given to the worker by the office clerk. Workers interviewed also confirmed that a briefing was given and that they understood the provisions in the employment contract.</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>Sampled during the audit were employment contracts and monthly payslips for the following workers. The contracts are valid, duly signed and are still in force. The employment contracts contain details of employment terms such as contract duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc.</p> <p>The sampled payslips also gave accurate information on compensation for work done. Salary deductions and overtime were in accordance with relevant laws (SOCSO, EPF, EIS) and Labour Office permits.</p>	Complied

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		<p>The payslips were sampled based on months with the highest, lowest and median crop production in order to get a clear representation of the workers' wages. The sampling number is calculated based on $n = \sqrt{x}$ (0.8) The details are as follows:</p> <ol style="list-style-type: none"> 1. Bukit Kelompok Estate: (payslips Feb, March, Oct 2022) Workers No. E770002594, E700001591, E700002594, E700004595, E700005605, E700001113, E700001180, E700001366, E700001454, E700001448, E700001452, and contracts workers Passports No. C8185663, C7323935, C7328915, C2232297. 2. Pasir Logok Estate: (payslips Feb, July, Nov 2022) Workers Passport No. C4659578, C2748760, C6899748, C5435545, C9508316, E0322284, E0322286, E0597042, C5140205, C7748692. 3. Pasir Panjang Mill: (payslips Feb, June, Oct 2022) Workers No. 951939, 952100, E440000025, E440000044, E440000058, E440000120, E440000170, E440000229, E440000267, E440000310, E440000198, E440000264. 4. Siang Estate: (payslips Feb, June, Nov 2022) 	
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		<p>Workers No. E910001670, E910001644, E910001528, E910001301, E910001672, passports No. C5722082, C7524390, EF0944760, EF0944741, E0117154, E1008930, C7332161.</p> <p>5. Pasir Panjang Estate: (payslips Feb, June, Sept 2022)</p> <p>Workers No. E690000024, E6900001130, E6900001142, E6900001269, E6900001672, E6900001952, E6900002074, E6900002116, E6900008207, E690000821, E6900002179, E6900000968.</p> <p>The sampled Labour Office permits were as follows:</p> <ol style="list-style-type: none"> a. Deduction for Tabung Khairat Permit No. TK (NJ) U – 21 dated 31 March 2019 for RM5 per month and not more than RM37.50 per month. b. Deduction for Lembaga Tabung Haji Permit No. TK(NK)U-21 dated 15/05/2017 of RM50 per month. c. Deduction for medical fees exceeding company subsidy Permit No. TK(NJ)U-21 dated 2/05/2019. d. Deduction for tabung surau No. PP3/29/036/2006 effective 01/06/2006. e. Monthly overtime exceeding 104 hours Permit Ref No. BHG. PU/9/134 Jld 34(8) dated 3/12/2020. 	
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		<p>Therefore, based on detailed review of sampled employment contracts and payslips, Pasir Panjang Mill and its supply base have demonstrated that the terms of the employment contracts are in accordance with local laws such as Employment Act, SOCSO Act, EIS Act and EPF Act, and relevant Labour Office permits.</p>	
<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>During the audit, employment contracts, payslips, punch cards showing overtime (for mill), work attendance sheets (for estates) of sampled workers were reviewed. Based on the review, and confirmed by the workers during audit interviews, the unit of certification was able to demonstrate that workers generally work 8 hours per day, and is entitled to one rest day. The workers sampled during the audit were the same as per those sampled in Indicator 6.2.1 above.</p> <p>Sampled at Pasir Panjang Mill were punch cards showing the additional hours. These were counter-checked against the respective workers' payslips. It was verified that workers who did overtime work are paid at a rate of 1.5 x hourly rate for the extra hours. Those who work on rest days do so voluntarily and were paid double the normal rate. Sampled payslips also showed that workers who were certified unwell by the clinic were given a paid medical leave. Voluntary salary deductions were also verified to be done in accordance with the Employment Act, as mentioned under Indicator 6.2.2 above. Statutory salary deductions were also verified to be in accordance with the relevant laws in Malaysia pertaining to SOCSO, EPF, EIS deductions.</p>	<p>Complied</p>

		There were no record of any dismissals during the audit period.	
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>All the units within Pasir Panjang Complex were able to demonstrate that they provided free adequate housing with sanitation facilities, free water and electric supplies, houses of worship, recreational amenities such as football fields, badminton/takraw courts, food canteens, sundry shops, multi-purpose hall and medical facilities which could be enjoyed by all works and their dependents.</p> <p>Records showed that the estates were visited by a Visiting Medical Officer Dr Hj Moiz bin Hj Siraj who visited the estate clinics twice a month on 16/10/2022, 27/10/2022, 07/11/2022, 27/11/2022. The VMO visits line site, supervise Medical/Health Assistants, and attend to patients if there are any.</p> <p>Each house at the linesite has between 2 to 3 bedrooms with between 1 to 6 occupants per house. The areas surrounding the housing area were generally clean and well maintained. Houses were generally in good state of repair, perimeter drains were clean and free-flowing, grass kept reasonably short, and domestic waste bins emptied twice weekly. Some houses at Siang Estate (16 houses at Siang Div & 24 units at Balau Div 24 units) have been earmarked for repainting in 2023.</p> <p>Housing inspections were conducted once a week where records of inspections were sighted.</p>	Complied

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		<p>At Bukit Kelompok Estate, housing inspections were carried out at Division B on 04/11/2022, 11/11/2022, 17/11/2022, and at Division A on 11/11/2022, 17/11/2022, and 25/11/2022.</p> <p>At Pasir Logok Estate, housing inspections were carried out on 03/11/2022, 10/11/2022, 16/11/2022, 24/11/2022.</p> <p>At Pasir Panjang Mill, housing inspections were carried out on 29/11/2022, 21/11/2022, 14/11/2022, 07/11/2022.</p> <p>Water supply is from estates' and mill's own source. Water quality samplings were carried out by Decagon Lab & Analytical Testing Sdn Bhd twice a year. Below are some of the sampled results:</p> <ul style="list-style-type: none"> - Bukit Kelompok Estate (Division A) sampling on 04/06/2022 (Ref LW/528(1-2)/22. Total coliform count: Nil; E.Coli: Nil. - Bukit Kelompok Estate (Division B) sampling on 04/06/2022 Total coliform count: Nil; E.Coli: Nil - Pasir Logok Estate sampling on 05/06/2022 (Ref LW/527(1-2)/22: Total coliform count: Nil; E.Coli: Nil. <p>Some long-serving workers who were awarded Rumah Bakti Ladang (where they are allowed to stay at the unit even after they have ceased working) have made several unauthorised extensions to the houses they live in at the linesite. A memo dated 16/01/2020 was issued prohibiting any new renovations. Meetings have been held with the affected workers to socialise the implications of such</p>	
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		<p>extensions in terms of law and safety. Minutes of meeting between management and affected workers dated 29/08/2022 at Pasir Panjang Estate was sighted. The affected workers were informed that the unauthorised extensions need to be removed and they have agreed to do so by April 2023.</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>Pasir Panjang Mill, Bukit Kelompok, Pasir Logok, Siang, Pasir Panjang Estates were able to demonstrate that efforts have been made to improve workers' access to adequate, sufficient and affordable food. Based on visits made to the canteen/grocery shops and interviews conducted with the canteen and grocery shop operators showed that price lists were submitted regularly for price and supply monitoring.</p> <p>Those who prepare food at the canteen have attended Food Handling Course. Sampled were Kedai S&MK Enterprise (Pasir Logok Estate) and Kedai Makan Keyla (Pasir Panjang Estate) who both attended the said course on 23/11/2022 conducted by United Academy PLT, an entity accredited by (accredited by the Ministry of Health, Malaysia).</p> <p>Cooking gas are also available at Kedai Runcit Yoke Lan (Pasir Panjang Estate) who has been issued with a permit to sell LPG issued under Control of Supplies Regulation 1974 issued on 14/04/2020 and is valid until 13/04/2023.</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>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 RM1,500 per month, or more.</p>	Complied

<p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC)</i></p>	<p>Pasir Panjang 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, creche facilities, sports and recreation, education and healthcare. Below is the breakdown of the prevailing wage calculation:</p> <table border="1" data-bbox="1149 544 1930 991"> <thead> <tr> <th>Mill/Estate</th> <th>In-kind benefits (RM)</th> <th>Average take-home pay (RM)</th> <th>Prevailing wage (RM)</th> </tr> </thead> <tbody> <tr> <td>Pasir Panjang Mill</td> <td>1,255.90</td> <td>1,832.24</td> <td>3,088.15</td> </tr> <tr> <td>Pasir Panjang Estate</td> <td>1,372.52</td> <td>2,146.10</td> <td>3,518.62</td> </tr> <tr> <td>Bukit Kelompok Estate</td> <td>1,172.62</td> <td>1,551.433</td> <td>2,724.05</td> </tr> <tr> <td>Siang Estate</td> <td>1,103.81</td> <td>1,100.00</td> <td>2,203.81</td> </tr> <tr> <td>Pasir Logok Estate</td> <td>314.34</td> <td>2,215.12</td> <td>2,529.46</td> </tr> </tbody> </table> <p>Based on the breakdown given, the calculation of prevailing wages including in-kind benefits is reasonable.</p>	Mill/Estate	In-kind benefits (RM)	Average take-home pay (RM)	Prevailing wage (RM)	Pasir Panjang Mill	1,255.90	1,832.24	3,088.15	Pasir Panjang Estate	1,372.52	2,146.10	3,518.62	Bukit Kelompok Estate	1,172.62	1,551.433	2,724.05	Siang Estate	1,103.81	1,100.00	2,203.81	Pasir Logok Estate	314.34	2,215.12	2,529.46	
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	<p><i>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 • 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, Pasir Panjang Mill and 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>			
<p>6.3.1</p>	<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 in Bahasa Malaysia and English are available and displayed at the main notice boards within the Pasir Panjang 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>Briefings on freedom of association were given to the workers as follows:</p> <p>Bukit Kelompok Estate: 06/01/2022, 05/06/2022.</p> <p>Pasir Logok Estate: 20/01/2022.</p> <p>Pasir Panjang Mill: 01/06/2022.</p> <p>Pasir Panjang Estate: 06/03/2022.</p> <p>Siang Estate: 16/08/2022.</p>	<p>Complied</p>

<p>6.3.2</p>	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>It was verified during the audit that NUPW representatives were freely elected by the workers, as confirmed by the trade union representatives who were interviewed.</p> <p>Minutes of meetings between the NUPW representatives and management were also sampled during the audit. These minutes were documented and prepared in Bahasa Malaysia and were duly verified as follows:</p> <p>Bukit Kelompok Estate on 23/05/2022</p> <p>Pasir Logok Estate on 13/05/2022</p> <p>Pasir Panjang Estate on 19/01/2022</p> <p>Pasir Panjang Mill on 17/10/2022</p> <p>Among the issues discussed included briefings on importance and benefits of MAPA/NUPW membership. Minimum Wages Order of RM1,500 per month which became effective 01/05/2022.</p>	<p>Complied</p>
<p>6.3.3</p>	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Based on interviews held with NUPW representatives, review of minutes of meeting between NUPW representatives and estate/mill management dated 23/05/2022 at Bukit Kelompok Estate, 13/05/2022 at Pasir Logok Estate, 19/01/2022 at Pasir Panjang Estate, and 17/10/2022 at Pasir Panjang Mill, it was verified that management did not interfere with the formation or operation of the NUPW. Workers' representatives were freely chosen from</p>	<p>Complied</p>

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		among the workers on a show of hands as confirmed by the workers themselves during interview.	
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>Kulim (Malaysia) Berhad has established Core Labour Standard Policy dated 1 May 2018 where they will 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 contracts signed with the following contractors:</p> <ol style="list-style-type: none"> 1. Contract for harvesting FFB in Field P11 (130.25ha) and P15 (211.40) at Ladang Pasir Panjang entered into between RKP Enterprise and Mahamurni Plantations Sdn Bhd effective from 01/04/2021 to 31/03/2024. 2. Contract for transporting CPO between Semai Setia Transport and Mahamurni Plantations Sdn Bhd effective from 01/06/2020 to 31/05/2023. 3. Contract for FFB harvesters with Perniagaan Sri Mahtai dated 17/05/2022 valid from 01/08/2021 to 31/07/2024. 4. Contract with recruitment agent PT Hamparan Karya Insani dated 27/05/2022. 	Complied

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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. Observations made in the field also confirmed that the minimum age requirements were met.</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>Based on the workers list of all units under Pasir Panjang Mill and its supply base, interviews conducted and observations made, there is no evidence that young persons are being employed either for non-hazardous work or otherwise.</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 engaged 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.</p> <p>This Policy was also communicated during stakeholder meeting held on 11/10/2022. Further, an Addendum to agreements signed with contractors also contains a provision which states that the contractor shall comply with applicable labour and employment laws regarding and prohibit any form of child labour, forced or trafficked labour. Interviews held with contractors and suppliers also confirmed their understanding of this obligation</p>	Complied

		<p>Briefings were also given to workers on the No Child Labour Policy as follows:</p> <p>Bukit Kelompok Estate: 01/08/2022</p> <p>Pasir Logok Estate: 26/05/2022</p> <p>Pasir Panjang Mill: 01/08/2022</p> <p>Siang Estate: 10/08/2022</p> <p>Pasir Panjang Estate: 11/05/2022.</p>	
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
<p>6.5.1</p>	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>A Policy to prevent sexual and other forms of harassment are available in Sexual Harassment Policy dated 7/12/2021 signed by Executive Director. This Policy has been communicated to all levels of workforce during muster briefings as follows:</p> <p>Bukit Kelompok Estate: 13/06/2022</p> <p>Pasir Logok Estate: 18/07/2022</p> <p>Pasir Panjang Mill: 01/06/2022</p> <p>Pasir Panjang Estate: 09/02/2022</p> <p>Siang Estate: 28/06/2022</p> <p>Interviews with workers (both men & women) confirmed their understanding of this Policy. The effectiveness of the muster briefings</p>	<p>OFI</p>

		would be enhanced if all contract workers are also made to attend the daily muster briefings. Thus OFI was raised.	
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Kulim (Malaysia) Berhad has established Core Labour Standard Policy dated 01/10/2021 signed by its Executive Director. The Policy 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.</p> <p>Interviews with female employees also show 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. This Standard was communicated to all levels of workforce during briefings on Company policies as follows:</p> <p>Bukit Kelompok Estate: 13/06/2022</p> <p>Pasir Logok Estate: 18/07/2022</p> <p>Pasir Panjang Mill: 01/06/2022</p> <p>Pasir Panjang Estate: 09/02/2022</p> <p>Siang Estate: 28/06/2022</p>	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.	A census form to assess the needs of new mothers is available. This form enables the assessment to be done of new mothers' needs for creche/childcare, antenatal, vaccination, maternity and paternity,	Complied

	<p>- Minor compliance -</p>	<p>postpartum care, prenatal check-up, breastfeeding facilities, awareness and counselling.</p> <p>Sighted were the following assessments carried out by WoW by way of face-to-face interviews to determine the needs of the new mothers:</p> <ul style="list-style-type: none"> - Bukit Kelompok Estate on 30/05/2022; and - Pasir Panjang Mill on 14/11/2022. 	
<p>6.5.4</p>	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>The Company's grievance mechanism is available and documented in Grievance Mechanism Doc. No. SQD/SMS/4.1 Issue No. 1 dated 1 Aug 2020. The scope covers all those who deal with Kulim (Malaysia) Berhad and may have complaints or grievances. 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.</p> <p>Clause 5.8 states that anonymity of complainants will be respected and protected if requested. This mechanism was briefed during muster briefings as follows:</p> <p>Bukit Kelompok Estate: 22/04/2022 Pasir Panjang Mill:01/06/2022 Pasir Panjang Estate: 09/01/2022 Siang Estate: 17/02/2022</p>	<p>Complied</p>

		There were no records of complaints related to these, so therefore, the issue of dealing with the complaint and grievance did not arise during the audit period.	
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>It was verified by way of interviews and documentation reviews that workers sampled during the audit had entered into the employment voluntarily.</p> <p>Passports:</p> <p>As confirmed by the workers, the unit of certification does not keep foreign workers’ passports. All passports have been handed over to each foreign worker. The passports are handed to the estate/mill management for purposes of passport/work permit renewals only.</p> <p>Recruitment fees:</p> <p>As confirmed by the foreign workers sampled, none of them had paid any recruitment fee to work at the unit of certification. This is also in line with the contract dated 27/05/2022 signed between Kulim (Malaysia) Berhad and PT Hamparan Karya Insani for manpower supply from Indonesia. The agreement states among others, that cost of transportation to the respective estates/mill will be borne by Kulim.</p> <p>Contract substitution:</p>	Complied

		<p>Foreign workers interviewed during the audit confirmed that they were aware of the types of work they would be doing in Malaysia before they left their home countries. There was no evidence of contract substitution.</p> <p>Involuntary overtime:</p> <p>All workers sampled confirmed that overtime work is voluntary and has never been forced on them. If overtime work is offered, they have a right to accept or reject it out of their own free will. Sighted during the audit were documents for the overtime work (for February, June, October 2022) which were signed by sampled workers indicating their consent to work overtime.</p> <p>Lack of freedom of workers to resign & penalty for termination of employment:</p> <p>None of the workers interviewed wanted to resign. However, if they so wish, 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> <p>Based on payslips sighted and confirmed during interviews held with workers, there was no evidence of any debt bondage and withholding</p>	
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		<p>of wages. The workers confirmed that they receive their full pay due to them every month by or before the 7th of the month.</p>	
<p>6.6.2</p>	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented. - Critical (Major) compliance -</p>	<p>None of the estates or mill employ temporary workers. However, there are migrant workers employed. Therefore, a special labour policy and procedures have been established under the Kulim (Malaysia) Berhad Core Labour Standard signed by Executive Director dated 1/10/2021. 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>A review of the pay slips, employment contracts, punch cards and interviews conducted with sampled workers, Pasir Panjang Mill and</p>	<p>Complied</p>

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		<p>its supply base were able to demonstrate the implementation of this Policy. The sampled workers were as follows:</p> <ul style="list-style-type: none"> • Bukit Kelompok Estate: (payslips Feb, March, Oct 2022) Workers No. E770002594, E700001591, E700002594, E700004595, E700005605, E700001113, E700001180, E700001366, E700001454, E700001448, E700001452, and contracts workers Passports No. C8185663, C7323935, C7328915, C2232297. • Pasir Logok Estate: (payslips Feb, July, Nov 2022) Workers Passport No. C4659578, C2748760, C6899748, C5435545, C9508316, E0322284, E0322286, E0597042, C5140205, C7748692. • Pasir Panjang Mill: (payslips Feb, June, Oct 2022) Workers No. 951939, 952100, E440000025, E440000044, E440000058, E440000120, E440000170, E440000229, E440000267, E440000310, E440000198, E440000264. • Siang Estate: (payslips Feb, June, Nov 2022) Workers No. E910001670, E910001644, E910001528, E910001301, E910001672, passports No. C5722082, C7524390, EF0944760, EF0944741, E0117154, E1008930, C7332161. 	
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		<ul style="list-style-type: none"> Pasir Panjang Estate: (payslips Feb, June, Sept 2022) Workers No. E690000024, E6900001130, E6900001142, E6900001269, E6900001672, E6900001952, E6900002074, E6900002116, E6900008207, E690000821, E6900002179, E6900000968. 	
<p>Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			

<p>6.7.1</p>	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The General Manager/ Senior Manager/ manager/ Deputy Manager/ Assistant In-Charge/ Acting manager of the respective Operating Units are appointed as the Chairman for Safety and Health Committee at the estate as stated in the appointment letter dated 15/09/2021 undersigned by the Chairman, ESG Committee Occupational Safety and Health Main Committee Kulim (M) Berhad.</p> <ol style="list-style-type: none"> 1. Pasir Panjang POM - OSHA safety meetings were conducted at an interval of 3 months at the mill to address all the OSH related issues. Sighted the meeting minutes dated 28/03/2022 (01/2022), 25/07/2022 (02/2022), 29/09/2022 (01/2022). 2. Pasir Logok Estate - OSHA safety meetings were conducted at an interval of 3 months at the estate to address all the OSH related issues. Sighted the meeting minutes dated 21/09/2022 (03/2022), 23/06/2022 (02/2022) and 10/03/2022 (01/2022). 3. Siang Estate - OSHA safety meetings were conducted at an interval of 3 months at the estate to address all the OSH related issues. Sighted the meeting minutes dated 12/09/2022 (03/2022), 16/06/2022 (02/2022), 29/03/2022 (01/2022). 4. Pasir Panjang Estate - OSHA safety meetings were conducted at an interval of 3 months at the estate to address all the OSH related issues. Sighted the meeting minutes dated 11/09/2022 (03/2022), 18/07/2022 (02/2022) and 24/03/2022 (01/2022). 	<p>Complied</p>
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<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>Emergency Procedures and Safe Working Procedures were available at the office, workshops and chemical stores. Emergency Plans were available for identified incidences such as Fire, Accident, Chemical Spillage and Evacuation. Emergency Response Team was formed in the estate to counter any unwanted emergencies.</p> <ol style="list-style-type: none"> 1. Pasir Panjang POM <ul style="list-style-type: none"> - ERP Plan and CPR Training – 08/05/2022 - Fire Drill Training & Use of Fire Extinguisher – 08/05/2022 2. Pasir Logok Estate <ul style="list-style-type: none"> - ERP & CPR Training – 08/08/2022 - Fire Drill Training & Use of Fire Extinguisher – 29/11/2022 2. Siang Estate <ul style="list-style-type: none"> - ERP Plan and CPR Training – 15/02/2022 3. Pasir Panjang Estate <ul style="list-style-type: none"> - ERP Plan and CPR Training – 30/11/2022 <p>First Aid Kits were available at all sampled work units Spraying Gang, Harvesting Gang, Workshop, Boiler Station and Chemical Store. The first aid kits were well equipped with first aid items as stated in the list. All items were seen to be replenished at monitored regularly as</p>	<p>Complied</p>
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		<p>per the monitoring checklist. The First Aid Kit holders were aware on how to use the items in case of an emergency.</p> <ul style="list-style-type: none"> - First Aid Training was conducted for first aid kit holders on 25/05/2022 at Pasir Panjang POM. - First Aid Training was conducted for first aid kit holders on 21/06/2022 at Pasir Logok Estate. - First Aid Training was conducted for first aid kit holders on 25/03/2022 at Siang Estate. - First Aid Training was conducted for the first aid kit holders on 12/05/2022 at Pasir Panjang Estate. <p>Accident Records were maintained in the operating units and verified as follows.</p> <p><u>Pasir Panjang POM</u></p> <p>Accident records for 2021 were maintained and updated on a monthly basis at the mill. There were 1 reported accident for the year 2021. The accident investigation has been conducted accordingly and the JKPP 6 forms have been submitted to DOSH and available for verification. The JKPP 8 form have been submitted for the year ending 2021 on 24/01/2022. As for 2022 there were 1 accident case in the mill. The JKPP 6 forms have been submitted to DOSH accordingly and available for verification.</p>	
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		<p><u>Pasir Logok Estate</u></p> <p>There were 17 accident cases reported for the year 2021 in the estate. The JKPP 8 Form has been submitted to DOSH and available for verification. As for 2022, there were 2 accident reported in the estate as of to date. The JKPP 6 Form and Accident Investigation Reports were available for verification.</p> <p><u>Siang Estate</u></p> <p>There were 1 accident case reported for the year 2021 which. The JKPP 8 Form for the year ending 2021 have been submitted to DOSH on 17/01/2022 and available for verification. There were 1 accident reported for the year 2022.</p> <p><u>Pasir Panjang Estate</u></p> <p>Accident records for 2021 were maintained and available for verification. There were 8 reported accidents for the year reported in the estate. The JKPP 8 Form have been submitted accordingly and available for verification.</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>All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang and Manuring Gang and visit to the stores of the respective estates and mill, it was sighted that all required PPEs were worn by the personals.</p>	Complied

	<p>- Critical (Major) compliance -</p>	<p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers were all in good working condition. Interview with workers indicated that they were all well aware that they have to sanitise themselves before returning home due to the hazard that the chemical residues could cause.</p>	
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<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>Medical care is provided to all the employees by the organization. Local workers and foreign workers were covered under SOCSO scheme. Sighted the contribution form (8A) for August 2022, September 2022 and October 2022 for the mill and all sampled estate as below.</p> <table border="1" data-bbox="1137 547 1933 1152"> <thead> <tr> <th>Operating Unit</th> <th>Month</th> <th>Total Workers</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Pasir Panjang POM</td> <td>Aug 2022</td> <td>106</td> <td>RM 7,449.10</td> </tr> <tr> <td>Sep 2022</td> <td>104</td> <td>RM 7,104.00</td> </tr> <tr> <td>Oct 2022</td> <td>102</td> <td>RM 7,259.60</td> </tr> <tr> <td rowspan="3">Pasir Logok Estate</td> <td>Aug 2022</td> <td>107</td> <td>RM 4,926.70</td> </tr> <tr> <td>Sep 2022</td> <td>144</td> <td>RM 5,339.20</td> </tr> <tr> <td>Oct 2022</td> <td>159</td> <td>RM 6,182.70</td> </tr> <tr> <td rowspan="3">Siang Estate</td> <td>Aug 2022</td> <td>170</td> <td>RM 7,231.90</td> </tr> <tr> <td>Sep 2022</td> <td>184</td> <td>RM 7,251.50</td> </tr> <tr> <td>Oct 2022</td> <td>181</td> <td>RM 7,926.00</td> </tr> </tbody> </table>	Operating Unit	Month	Total Workers	Amount	Pasir Panjang POM	Aug 2022	106	RM 7,449.10	Sep 2022	104	RM 7,104.00	Oct 2022	102	RM 7,259.60	Pasir Logok Estate	Aug 2022	107	RM 4,926.70	Sep 2022	144	RM 5,339.20	Oct 2022	159	RM 6,182.70	Siang Estate	Aug 2022	170	RM 7,231.90	Sep 2022	184	RM 7,251.50	Oct 2022	181	RM 7,926.00	<p>Complied</p>
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6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	Occupational Injuries were recorded using the Lost Time Accident metrics as below:	Complied												

	- Minor compliance -	Operating Unit	2021		2022 (to date)		
			Cases	Days	Cases	Days	
		Pasir Panjang POM	1	9	1	64	
		Pasir Logok Estate	17	97	2	-	
		Siang Estate	1	14	1	-	
		Pasir Panjang Estate	8	10	-	-	
* Death case is categorized as loss of 6000 days.							
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>IPM Plan has been established in the certification unit estates which includes the planting of beneficial plants and control of damage by rodents and leaf eating pest</p> <p>Beneficial plants such as Turnera subulata and Cassia cobanensis are grown in the estates and their records of planting in new areas and maintenance of existing areas of beneficial plants and location maps are available. Rat damage and leaf-eating pest census was regularly</p>					Complied

		<p>carried out to obtain information about threshold level and action to be taken thereafter. The records of census and rat baiting (averaging fruitlet damage <2%) were available for verification.</p> <p>Barn owl census conducted showed that it is inhabited. Additional owl boxes had been added, ratio ranging from 1:21 ha to 1:37 ha from one estate to another. Occupancy rate ranges from 59% - 70% among the estates visited. Inspection at one random barn owl box showed that it is inhabited with bones and bird droppings sighted on the ground at the foot of the barn owl box pole.</p>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>There were no species referenced in the Global invasive Species database and CABI.org sighted within the estate and POM premises.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>No evidence of fire use to control pest in the estates sampled.</p>	Complied
<p>Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p>	<p>The written justification of all agrochemicals is available in the Kulim Malaysia Berhad Agricultural Manual; Justification of chemical use; Table H01-2 till Table H01-6. The table states the Weed Situation,</p>	Complied

	- Critical (Major) compliance -	Active Ingredient, Chemical Brand Name, Product Rate/Ha and CKS Dossage/18L																																	
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of Pesticide/Agrochemicals used in the estate were recorded and monitored on a monthly basis and available for verification. Data were sampled as below:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th></th> <th>Sep 2022</th> <th>Oct 2022</th> <th>Nov 2022</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Pasir Logok Estate</td> <td>a.i / Ha</td> <td>0.0062</td> <td>0.0049</td> <td>-</td> </tr> <tr> <td>LD50</td> <td>0.0016</td> <td>0.0009</td> <td>-</td> </tr> <tr> <td rowspan="2">Siang Estate</td> <td>a.i / Ha</td> <td>0.0062</td> <td>0.0056</td> <td>0.0077</td> </tr> <tr> <td>LD50</td> <td>0.0000</td> <td>0.0000</td> <td>0.0000</td> </tr> <tr> <td rowspan="2">Pasir Panjang Estate</td> <td>a.i / Ha</td> <td>0.0277</td> <td>0.0183</td> <td>0.0566</td> </tr> <tr> <td>LD50</td> <td>0.0008</td> <td>0.0000</td> <td>0.0071</td> </tr> </tbody> </table>	Estate		Sep 2022	Oct 2022	Nov 2022	Pasir Logok Estate	a.i / Ha	0.0062	0.0049	-	LD50	0.0016	0.0009	-	Siang Estate	a.i / Ha	0.0062	0.0056	0.0077	LD50	0.0000	0.0000	0.0000	Pasir Panjang Estate	a.i / Ha	0.0277	0.0183	0.0566	LD50	0.0008	0.0000	0.0071	Complied
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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 estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan.</p> <p>Sighted during the site visit at all the estates, the establishment of beneficial plants along the estate roads and immature areas as well</p>	Complied																																

		as barn owl boxes placed at strategic areas. Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead.	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -	There is no prophylactic use of pesticides in all estates visited.	Complied
7.2.5	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. The due diligence refers to: 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. - Minor compliance -	The Chemical Registers for the mill and sampled estates were available for verification and reviewed yearly and as and when there are introductions of new chemicals in the operations. The register showed that only class III & IV pesticides were used at the mill and estates. Paraquat and Monocrotophos was eliminated. In its place, less hazardous alternatives such as Glyphosate and Acephate was used instead.	Complied

<p>7.2.6</p>	<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>Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators based on the PPE issuance forms.</p> <p>Sampled the training conducted for pesticide handlers as below: -</p> <table border="1" data-bbox="1137 571 1926 1007"> <thead> <tr> <th><u>Estate</u></th> <th><u>Training</u></th> <th><u>Date</u></th> </tr> </thead> <tbody> <tr> <td rowspan="3">Pasir Logok Estate</td> <td>Spraying Training - Blocus</td> <td>09/01/2022</td> </tr> <tr> <td>Spraying Calibration Training</td> <td>15/09/2022</td> </tr> <tr> <td>Chemical Handling Training</td> <td>15/09/2022</td> </tr> <tr> <td>Siang Estate</td> <td>Spraying Training</td> <td>06/06/2022</td> </tr> <tr> <td rowspan="2">Pasir Panjang Estate</td> <td>Spraying Training</td> <td>29/03/2022</td> </tr> <tr> <td>Sprayers Training – HCV & Buffer Zone.</td> <td>29/03/2022</td> </tr> </tbody> </table>	<u>Estate</u>	<u>Training</u>	<u>Date</u>	Pasir Logok Estate	Spraying Training - Blocus	09/01/2022	Spraying Calibration Training	15/09/2022	Chemical Handling Training	15/09/2022	Siang Estate	Spraying Training	06/06/2022	Pasir Panjang Estate	Spraying Training	29/03/2022	Sprayers Training – HCV & Buffer Zone.	29/03/2022	<p>Complied</p>
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<p>7.2.7</p>	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and all estate's Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the storekeeper was seen to unlock the padlock to open entrance door for auditor to inspect the store. At the entrance door, signage</p>	<p>Complied</p>																		

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		requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety Data Sheet were available.	
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -	<p>Excess chemical containers that were not used for premixing have been triple rinsed and punctured was categorized under scheduled waste and disposed through waste contractors.</p> <p>Verified the disposal records for the sampled estates as below.</p> <ol style="list-style-type: none"> 1. Pasir Logok Estate has disposed the Empty Chemical Container to Licensed 3rd party Contractor, 5E Resources Sdn Bhd. Consignment Note: 2022070617TK5PWM; Dated 30/06/2022 was available for verification. A total of 0.1630 mt of Empty Chemical Containers was disposed under code SW409. 2. Siang Estate has disposed Empty chemical Containers to licensed 3rd Party Contractor, Kualiti Alam Sdn Bhd. Latest Sale of Empty Chemical Containers was on 26/10/2022 with the Consignment Note available for verification (Doc Number: 0171298). A total of 2 Jumbo bags was disposed under code SW 409. 3. Pasir Panjang Estate has disposed Empty chemical Containers to licensed 3rd Party Contractor, 5E Resources Sdn Bhd. Latest Sale of Empty Chemical Containers was on 05/12/2022 with the Consignment Note available for verification (CN Number: 	Complied

		2022120515BGJWM2). A total of 0.032 mt as disposed under code SW 409.	
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	No aerial spraying for pesticide were done in all the estates	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>The CHRA of each operating units have recommended the necessity of annual medical surveillance for pesticide applicators exposed to pesticides that are classified as organophosphates. There was no use of organophosphate chemicals in all the estates audited. This was verified via the Chemical Register, visit to the Chemical Store of each operating units as well as interview with the respective estate’s pesticide applicators. Nevertheless, the estates conduct monthly health screening at the estate clinics by their own Medical Assistant and records were available for verification. Health surveillances are also done for the workers to identify general health conditions regularly. Records were available and verified as below:</p> <ol style="list-style-type: none"> 1. Pasir Logok Estate - Medical Surveillance was conducted for workers expose to hazardous chemicals in the estate. The medical surveillance was conducted by Uni Klinik, Permas Jaya on 17/08/2022 for 25 workers. 15 workers were declared fit to 	Complied

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		<p>work while 3 workers were declared unfit and recommended for medical removal. Evidence of removal were available for verification.</p> <ol style="list-style-type: none"> 2. Siang Estate – Medical Surveillance was conducted for workers exposed to hazardous chemicals in the state. The Medical Surveillance was conducted by Dr. Rosman Surie (OHD: HQ/15/DOC/00/437) on 19/07/2022 for 15 workers. 2 workers were declared unfit to work with occupational caused abnormal results. 3. Pasir Panjang Estate - Medical Surveillance was conducted for 47 workers exposed to hazardous chemicals in the estate. The medical surveillance was conducted on 21/07/2022 for 27 workers. 3 workers were declared unfit to work as per report and have been removed by the management from spraying works. 	
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>All estates visited have prohibited woman workers who are confirmed pregnant or breast-feeding to handle chemicals as per Internal Memo verified in the estates.</p> <p>For Kulim (Malaysia) Berhad, the SOP for Agrochemical Management under Sustainable Management System; Doc Number: SQD/SMS/6.1; Doc Date: 01.08.2020 (Issue 01) states <i>"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."</i></p>	Complied

Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.															
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Pasir Panjang Palm Oil Mill, Pasir Panjang Estate and Bukit Kelompok Estate had identified all wastes and sources of pollution. The Waste Management Action Plan 2022 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estates and mill operations were:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">Waste type</th> <th style="width: 25%;">Source</th> <th style="width: 50%;">Action</th> </tr> </thead> <tbody> <tr> <td>Empty pesticide container (SW409)</td> <td>Chemical store</td> <td rowspan="4">For containers that to be disposed, securely placed in the SW Store. When there is adequate quantity 20MT or due to 180 days, contact the licenced contractor for collection and disposal</td> </tr> <tr> <td>Empty pesticide packaging (SW409)</td> <td>Chemical store</td> </tr> <tr> <td>Empty Hydrocarbon containers (SW409)</td> <td>Workshop</td> </tr> <tr> <td>Batteries (SW102)</td> <td>Workshop</td> </tr> </tbody> </table>	Waste type	Source	Action	Empty pesticide container (SW409)	Chemical store	For containers that to be disposed, securely placed in the SW Store. When there is adequate quantity 20MT or due to 180 days, contact the licenced contractor for collection and disposal	Empty pesticide packaging (SW409)	Chemical store	Empty Hydrocarbon containers (SW409)	Workshop	Batteries (SW102)	Workshop	Complied
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Empty pesticide packaging (SW409)	Chemical store														
Empty Hydrocarbon containers (SW409)	Workshop														
Batteries (SW102)	Workshop														

		Spent oil (SW305)	Workshop	
		Contaminated Rags / sacks (SW410)	Fertilizer store, Chemical store	
		Hydrocarbon / pesticide spillages (SW408)	Workshop	
		Contaminated soil (SW409)	Workshop	
		Medical Waste	Clinic	
		Effluent Discharge (Mill)	Furrow	
		POME (Mill)	Extraction of CPO	
		<p>The waste generated from the mill/estates operations as shown below. This Pasir Panjang POM, Pasir Panjang Estate and Bukit Kelompok Estate has identified all waste products and its source of pollution and documented in Types of Waste Products and Method of Disposal. The waste identified as follows:</p>		

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		Type of waste		Details	
		1	2		
		Scheduled waste	Non-Schedule waste	SW409, SW102, SW305, SW410, SW408, SW409, SW307, SW410, SW422, SW430, SW307, SW404, SW110, SW110/109 Domestic waste, Plastic, Garden waste, Kitchen waste, Scrap Iron, Empty Bags, Empty Pesticide containers, palm by product, Liquid waste, Office waste, Rubber materials, POME, Black Smoke etc.	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Procedure of Schedule waste management has been established. Refer Work Instruction Schedule Waste, Doc. No: SPO/WI/06 dated 01/10/2020. Other reference made was Guidelines for Packaging, Labelling and Storage of Scheduled Wastes In Malaysia.</p> <p>Awareness training on Schedule waste has been conducted as per date below:</p> <p>Bukit Kelompok Estate:25/09/2022</p> <p>Pasir Logok Estate: 20/09/2022</p> <p>Siang Estate: 21/03/2022</p> <p>Pasir Panjang Estate: 05/09/2022</p>		Non-compliance	

		<p>Pasir Panjang POM: 22/05/2022</p> <p>Record of Inventory of Schedule Waste and Disposal Record as per details below:</p> <p><u>Bukit Kelompok Estate</u></p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> • File reference Number: AS(B)J11/123/000/066 • Date Reporting: 04/12/2022 • Waste Generated: SW102, SW109, SW110, SW305, SW306, SW307, SW404, SW408, SW409, SW410. <p><u>Disposal</u></p> <p>Sample 1</p> <ul style="list-style-type: none"> • Disposal consignment note: 2022061912P4X8YU • Date Disposal: 15/06/2022 • SW305 - Spent Lubricating Oil: 0.1320 MT by 5E Resources Sdn Bhd <p>Sample 2</p> <ul style="list-style-type: none"> • Disposal consignment note: 2022061912N3TDK0 • Date Disposal: 15/06/2022 	
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		<ul style="list-style-type: none"> SW307 – Spent Mineral Oil – water emulsion: 0.068 MT by 5E Resources Sdn Bhd <p><u>Pasir Logok Estate</u></p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> File reference Number: AS(B)J11/123/000/165 Date Reporting: 29/11/2022 Waste Generated: SW102, SW109, SW110, SW305, SW306, SW307, SW404, SW408, SW409, SW410 <p><u>Disposal</u></p> <p>Sample 1</p> <ul style="list-style-type: none"> Disposal consignment note: 20220706179857CW Date Disposal: 30/06/2022 SW408 Contaminated Soil, Debris: 0.0460 MT by 5E Resources Sdn Bhd <p><u>Pasir Panjang POM</u></p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> File reference Number: JAS.JPG.600-3/1/15 Date Reporting: 29/11/2022 	
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		<ul style="list-style-type: none"> Waste Generated: SW102, SW110, SW 305, SW306, SW307, SW408, SW409, SW410, SW429 <p><u>Disposal</u></p> <p>Sample 1</p> <ul style="list-style-type: none"> Disposal consignment note: 2022072516TF4S7J Date Disposal: 25/07/2022 SW 409 – Empty Container: 0.0985 MT by Kualiti Alam Sdn Bhd <p>Sample 2</p> <ul style="list-style-type: none"> Disposal consignment note: 2022072516MWTQ69 Date Disposal: 25/07/2022 SW 410 – Filter Oil: 0.0850 MT by Kualiti Alam Sdn Bhd <p><u>Siang Estate</u></p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> File reference Number: AS(B)J11/123/000/156 Date Reporting: 30/11/2022 Waste Generated: SW102, SW109, SW110, SW305, SW306, SW307, SW404, SW408, SW409, SW410. <p><u>Disposal</u></p>	
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		<p>Sample 1</p> <ul style="list-style-type: none"> Disposal consignment note: 20221027121NPYA6 Date Disposal: 27/10/2022 SW102 – Waste of lead acid batteries: 0.0600 MT by Kualiti Alam Sdn Bhd <p><u>Pasir Panjang Estate</u></p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> File reference Number: AS(B)J11/123/000/167 Date Reporting: 06/12/2022 Waste Generated: SW102, SW109, SW110, SW305, SW306, SW307, SW404, SW408, SW409, SW410. <p><u>Disposal</u></p> <p>Sample 1</p> <ul style="list-style-type: none"> Disposal consignment note: 20221205156o5B8M Date Disposal: 05/12/2022 SW102 – Waste of lead acid batteries: 0.0600 MT by Kualiti Alam Sdn Bhd <p>Minor NC</p>	
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		<p>The Disposal of waste was not conducted in responsible manner</p> <p>Found during linesite inspection at Ladang Pasir Panjang, a car skeletal frame half covered with <i>Mucuna bracteata sp</i> left next to House No.LPP 59 for at least the past 7 months. Thus, Minor NC was raised.</p>																								
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>Refer Work Instruction Landfill, Doc No: SPO/WI/03 dated 01/10/2020. Disposal for domestic and non-hazardous waste is through landfilling at designated area within estate. Segregation of non-degradable and degradable waste was done at site and dumping of waste only allowed for degradable waste. Verified at sampled estates as below:</p> <table border="1" data-bbox="1137 775 1935 1123"> <thead> <tr> <th rowspan="2">Estate</th> <th colspan="3">Landfill</th> </tr> <tr> <th>Block No</th> <th>Pit No</th> <th>Date Open</th> </tr> </thead> <tbody> <tr> <td>Bukit Kelompok</td> <td>P05/02</td> <td>3</td> <td>29/11/2022</td> </tr> <tr> <td>Pasir Logok</td> <td>P04/02</td> <td>32</td> <td>15/11/2022</td> </tr> <tr> <td>Siang</td> <td>P04/01</td> <td>24</td> <td>28/11/2022</td> </tr> <tr> <td>Pasir Panjang</td> <td>P15/04</td> <td>23</td> <td>01/08/2022</td> </tr> </tbody> </table> <p>Awareness training on Zero Burning has been conducted as dated below:</p>	Estate	Landfill			Block No	Pit No	Date Open	Bukit Kelompok	P05/02	3	29/11/2022	Pasir Logok	P04/02	32	15/11/2022	Siang	P04/01	24	28/11/2022	Pasir Panjang	P15/04	23	01/08/2022	Complied
Estate	Landfill																									
	Block No	Pit No	Date Open																							
Bukit Kelompok	P05/02	3	29/11/2022																							
Pasir Logok	P04/02	32	15/11/2022																							
Siang	P04/01	24	28/11/2022																							
Pasir Panjang	P15/04	23	01/08/2022																							

		<p>Bukit Kelompok Estate: 22/10/2022</p> <p>Pasir Logok Estate: 22/10/2022</p> <p>Siang Estate: 29/11/2022</p> <p>Pasir Panjang Estate: 02/08/2022</p>	
<p>Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>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:</p> <p>D01 – General Information</p> <p>D02 – Methods of Applications</p> <p>D03 – Precision Manuring</p> <p>D04 – Quality Check and Storage</p> <p>D05 – EFB Utilization</p> <p>D06 – POME Utilization</p> <p>D07 – MIWAMAS Composting System</p> <p>D08 – Bio-compost Application</p> <p>D09 – Bio-compost: Quality Check</p>	Complied

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<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.</p> <p>- Minor compliance -</p>	<p>Foliar and soil sampling was carried out by Internal Agronomist from Agronomy Advisory and Services Department prior to the fertilizer recommendation for the next financial year. Leaf and soil nutrient analysis are commonly used in the diagnosis of fertilizer requirements in oil palms. The frequency for leaf sampling must be 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> <ol style="list-style-type: none"> 1. <u>Pasir Logok Estate</u> Latest Soil Sampling was conducted from 20/04/2022 – 10/05/2022. Refer report no. SI/2022/05/53 dated 11/05/2022. Latest leaf sampling was conducted in February 2022. Refer report no. LI/2021/02/19 dated 09/02/2022. 2. <u>Siang Estate</u> Latest Soil Sampling was conducted from 07/11/2022 – 14/11/2022. Refer report no. SI/2022/11/168 dated 15/11/2022. Latest leaf sampling was conducted by UTCL Laboratory on 03/11/2022 – 07/11/2022. Refer report no. LI/2022/11/186 dated 08/11/2022. 3. <u>Pasir Panjang Estate</u> 	<p>Complied</p>
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		<p>Latest Soil Sampling was conducted from 19/01/2021 – 31/01/2021. Refer report no. SI/2021/02/11 dated 02/02/2021. Latest leaf sampling was conducted by UTCL Laboratory on 01/03/2022 – 07/03/2022. Refer report no. LI/2022/03/2022 dated 09/03/2022.</p>							
7.4.3	<p>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.</p> <p>- Minor compliance -</p>	<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 palm’s 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 Pasir Panjang Mill. <p>The estate has established EFB and Bio-Compost application program FY 2022. Reviewed the application records as to date November 2022 as follows:</p> <table border="1" data-bbox="1137 1034 1926 1177"> <thead> <tr> <th>Year</th> <th>EFB Transported for Field Application (MT)</th> <th>EFB Converted to Compost (MT)</th> </tr> </thead> <tbody> <tr> <td>2020</td> <td>30,377.64</td> <td>21,189.02</td> </tr> </tbody> </table>	Year	EFB Transported for Field Application (MT)	EFB Converted to Compost (MT)	2020	30,377.64	21,189.02	Complied
Year	EFB Transported for Field Application (MT)	EFB Converted to Compost (MT)							
2020	30,377.64	21,189.02							

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		2021	31,325.32	17,143.61	
		2022 (as at Nov)	40,628.57	15,439.70	
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	The fertiliser application was conducted as per recommendation by agronomist base on foliar sampling conducted. The fertiliser application records were available at the estate visited for review. The estate reported the fertilised application to the Agronomy Advisory and Services Department on monthly basis. Reviewed the report for the month of September, October and November 2022.			Complied
Criterion 7.5: Practices minimise and control erosion and degradation of soils.					
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	Soil maps were available at all estates identifying the type of soil series and its area percentage in the estate. There were no marginal and fragile soils identified at the assessed estates. During field visit at the estates, it was sighted there was no oil palm planting on steep terrains as well. Please see indicator 7.6.3 for landscape topography information.			Complied
7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.	Addressed in the Agricultural Manual under chapter as follows: 1. A07 – Terrace and Platform Construction 2. A07A – Palm Lining and Terrace			Complied

	- Minor compliance -	<ul style="list-style-type: none"> 3. A08 – Harvester Path Construction 4. A17 – Protection of Natural Water Courses and 5. A18 – Water Management Plan in Peat Area. <p>No replanting was conducted on steep slopes more than 25 degree.</p>	
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>No new planting conducted at all estates visited as verified and sighted during site visit.</p>	Complied
<p>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.</p>			
7.6.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Soil series and topography map available for estate sampled. No fragile soil categorized in the estates sampled.</p> <p>The estate has taken into account the land terrain, drainage and road systems in planning the 2022 replanting.</p>	Complied
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>Addressed in the Agricultural Manual under chapter as follows:</p> <ul style="list-style-type: none"> 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 	Complied

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		5. A18 – Water Management Plan in Peat Area. Pasir Panjang certification unit does not have any marginal or fragile soils in its area of certification.																													
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	<p>The Agronomy Advisory and Services Department conducted assessment and provided the estates with topography maps. Sampled topography information at estates sited as follows:</p> <table border="1"> <thead> <tr> <th>Degree</th> <th>Pasir Panjang Estate</th> <th>Pasir Logok Estate</th> <th>Tunjuk Laut Estate</th> </tr> </thead> <tbody> <tr> <td>0°-2°</td> <td>12.11</td> <td>7.10</td> <td>12.35</td> </tr> <tr> <td>2°-6°</td> <td>27.46</td> <td>22.99</td> <td>11.43</td> </tr> <tr> <td>6°-12°</td> <td>42.66</td> <td>46.80</td> <td>56.61</td> </tr> <tr> <td>12°-20°</td> <td>14.85</td> <td>23.11</td> <td>18.93</td> </tr> <tr> <td>20°-25°</td> <td>1.97</td> <td>-</td> <td>0.44</td> </tr> <tr> <td>>25°</td> <td>0.95</td> <td>-</td> <td>0.24</td> </tr> </tbody> </table>	Degree	Pasir Panjang Estate	Pasir Logok Estate	Tunjuk Laut Estate	0°-2°	12.11	7.10	12.35	2°-6°	27.46	22.99	11.43	6°-12°	42.66	46.80	56.61	12°-20°	14.85	23.11	18.93	20°-25°	1.97	-	0.44	>25°	0.95	-	0.24	Complied
Degree	Pasir Panjang Estate	Pasir Logok Estate	Tunjuk Laut Estate																												
0°-2°	12.11	7.10	12.35																												
2°-6°	27.46	22.99	11.43																												
6°-12°	42.66	46.80	56.61																												
12°-20°	14.85	23.11	18.93																												
20°-25°	1.97	-	0.44																												
>25°	0.95	-	0.24																												
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.	There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in the estates	Complied																												

	- Critical (Major) compliance -		
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE:</p> <p>Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	The Kulim Management team already send the inventory of Peat area that applicable under Kulim Berhad to RSPO secretariat dated 12/9/2019. No peat soil in sampling estate (Pasir Logok estate and Tunjuk Laut estate).	Complied
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in the estates	Complied
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	There is no peat soil in sampled estates however management already establish the SOP on water and ground cover management programme is documented in the KMB Agricultural Manual (Water Management in Inland, Costal and Peat lands) issued on 01.07.2011.	Complied
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. 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</p>	There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in the estates.	Complied

	<p>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>	There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in the estates.	Complied
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>	There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in the estates.	Complied
<p>Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.</p>			

<p>7.8.1</p>	<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> <ul style="list-style-type: none"> a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. b) Workers have adequate access to clean water. <p>- Minor compliance -</p>	<p>The Pasir Panjang Certification Units monitors water quality of outgoing waters to identify any adverse effect from the mill and estate activities. There is no water from mill discharge to waterways. All water from ETP at mill are used for land irrigation. The plan takes into account the efficient use of resources, ensure amongst others that the use of water did not impact on other users, avoid contamination of ground and surface water, and appropriate treatment of mill effluent. The mill and estate water management plans have been established with the recent review made on 01/08/2022. Among topics discussed in the management Plan were:</p> <p>Estate</p> <table border="1" data-bbox="1137 758 1933 1152"> <thead> <tr> <th data-bbox="1137 758 1402 815">Activity</th> <th data-bbox="1408 758 1666 815">Water Use</th> <th data-bbox="1673 758 1933 815">Action Plan</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 820 1402 1152">Spraying & Manuring</td> <td data-bbox="1408 820 1666 1152">Water pollution, degradation of water quality, water availability</td> <td data-bbox="1673 820 1933 1152">Buffer Zone area where all the activity (Spraying and Manuring) not allowed in these areas Inlet and outlet water analysis after manuring activity</td> </tr> </tbody> </table>	Activity	Water Use	Action Plan	Spraying & Manuring	Water pollution, degradation of water quality, water availability	Buffer Zone area where all the activity (Spraying and Manuring) not allowed in these areas Inlet and outlet water analysis after manuring activity	<p>Complied</p>
Activity	Water Use	Action Plan							
Spraying & Manuring	Water pollution, degradation of water quality, water availability	Buffer Zone area where all the activity (Spraying and Manuring) not allowed in these areas Inlet and outlet water analysis after manuring activity							

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				No construction of bunds/weirs/damn across the main rivers or waterways	
		Cleaning process	Wastage of water	Monitor use of water	
				Awareness briefing on water usage efficiently	
				Monitor leakage and periodically maintenance	
		Linesite	Water Pollution	Drinking water analysis as required by SPAN	
				Monitor condition of Septic Tank	
7.8.2	(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	Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. Riparian buffer zones have been identified and demarcated. White and blue stripe marker poles were erected. No chemicals and fertilizer application observed			Complied

	<p>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>been used in their maintenance. In some areas Guatemala grass were planted along the riverbanks. The guidelines are detailed in the SOP No A17: Protection of Natural of Water Course. The buffer zones established are as follows</p> <table border="1" data-bbox="1137 507 1901 919"> <thead> <tr> <th>River width (meter)</th> <th>Minimum width for river reserve (m) for peninsular Malaysia and Sarawak</th> </tr> </thead> <tbody> <tr> <td>1-5</td> <td>5</td> </tr> <tr> <td>5-10</td> <td>10</td> </tr> <tr> <td>10-20</td> <td>20</td> </tr> <tr> <td>20-40</td> <td>40</td> </tr> <tr> <td>>40</td> <td>50</td> </tr> </tbody> </table> <p>All estates monitored river water entering and exiting their property. Water sampling for Nitrate Nitrogen and Phosphate was done in months when fertilisers were applied. Analysis was assigned to UTCL Laboratory, Kota Tinggi.</p> <p><u>Bukit Kelompok Estate</u> <u>Inlet & Outlet</u></p>	River width (meter)	Minimum width for river reserve (m) for peninsular Malaysia and Sarawak	1-5	5	5-10	10	10-20	20	20-40	40	>40	50	
River width (meter)	Minimum width for river reserve (m) for peninsular Malaysia and Sarawak														
1-5	5														
5-10	10														
10-20	20														
20-40	40														
>40	50														

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		<ul style="list-style-type: none"> • Date of report: 20/10/2022 • Report No: W1/2022/10/613 • Date Tested: 16/10 – 20/10/2022 • Sample point: W1-1190 In Let Point 1 P10 and W1-1192 Out Let W1-1193 Outlet Point 2 P13 <p><u>Pasir Logok Estate</u></p> <ul style="list-style-type: none"> • Date of report: 28/09/2022 • Report No: W1/2022/09/569 • Date Tested: 21-26/09/2022 • Sample point: W1-1490-Inlet In P09/03, W1-1491-Outlet P07/03 <p><u>Pasir Panjang POM</u></p> <p>Sample 1</p> <ul style="list-style-type: none"> • Date of report: 23/10/2022 • Report No: EI/2022/10/171 • Date Tested: 12/10/2022 to 20/10/2022 • Sample point: Raw Effluent, EI-1122, Cooling Pond 1, EI1123, Cooling Pond, EI-1124, Cooling Pond 3, EI-1125 <p>Sampel 2</p>	
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		<ul style="list-style-type: none"> • Date of report: 23/10/2022 • Report No: EI/2022/10/171 • Date Tested: 12/10/2022 to 20/10/2022 • Sample point: Clerifier 1, EI-1135, Aeration 3, EI-1136 <p><u>Siang Estate</u></p> <p><u>Inlet & Outlet</u></p> <ul style="list-style-type: none"> • Date of report: 30/11/2022 • Report No: W1/2022/11/692 • Date Tested: 23-29/11/2022 • Sample point: W1-1832 In Let Point P10 and W1-1833 Out Let P03A <p><u>Pasir Panjang Estate</u></p> <p><u>Inlet & Outlet</u></p> <ul style="list-style-type: none"> • Date of report: 23/10/2022 • Report No: W1/2022/10/615 • Date Tested: 20/10/2022 • Sample point: W1-1482 In Let Point 1 P11/01 and W1-1192 Out Let W1-1483 Outlet Point 2 P17/02 	
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<p>7.8.3</p>	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>The effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No overflow was observed, and flow meter reading was recorded daily.</p> <p>Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is quarterly monitored as per OER. Effluent Analysis conducted by accredited laboratory, Mahamurni Plantations Sdn Bhd and submitted to DOE every 3 months through OER (Online Environmental Report) and in compliance with mill's compliance schedule for quarterly submission. Refer to the latest report for dated October 2022. Monthly analysis was done for final discharge point. Total of 8 parameters (pH, BOD3, COD, TS, SS, TN, AN and O&G) were tested. Latest analysis report for 1st, 2nd, and 3rd Quarter quarters of year 2022.</p> <table border="1" data-bbox="1137 887 1919 1160"> <thead> <tr> <th>Report Date</th> <th>Quarter/Week</th> <th>BOD (Limit=1000mg/L)</th> </tr> </thead> <tbody> <tr> <td rowspan="3">10/10/2022</td> <td>1stweek/1stmonth</td> <td>166.00</td> </tr> <tr> <td>5thweek/2ndMonth</td> <td>110.00</td> </tr> <tr> <td>9thweek/3rdMonth</td> <td>90.00</td> </tr> </tbody> </table>	Report Date	Quarter/Week	BOD (Limit=1000mg/L)	10/10/2022	1 st week/1 st month	166.00	5 th week/2 nd Month	110.00	9 th week/3 rd Month	90.00	<p>Complied</p>
Report Date	Quarter/Week	BOD (Limit=1000mg/L)											
10/10/2022	1 st week/1 st month	166.00											
	5 th week/2 nd Month	110.00											
	9 th week/3 rd Month	90.00											

		<table border="1"> <tr> <td data-bbox="1144 371 1305 419">12/07/2022</td> <td data-bbox="1328 371 1581 419">1stweek/1stmonth</td> <td data-bbox="1581 371 1917 419">77.00</td> </tr> <tr> <td data-bbox="1144 419 1305 475"></td> <td data-bbox="1328 419 1581 475">5thweek/2ndMonth</td> <td data-bbox="1581 419 1917 475">76.00</td> </tr> <tr> <td data-bbox="1144 475 1305 531"></td> <td data-bbox="1328 475 1581 531">9thweek/3rdMonth</td> <td data-bbox="1581 475 1917 531">150.00</td> </tr> <tr> <td data-bbox="1144 531 1305 587">12/04/2022</td> <td data-bbox="1328 531 1581 587">1stweek/1stmonth</td> <td data-bbox="1581 531 1917 587">69.00</td> </tr> <tr> <td data-bbox="1144 587 1305 643"></td> <td data-bbox="1328 587 1581 643">5thweek/2ndMonth</td> <td data-bbox="1581 587 1917 643">94.00</td> </tr> <tr> <td data-bbox="1144 643 1305 699"></td> <td data-bbox="1328 643 1581 699">9thweek/3rdMonth</td> <td data-bbox="1581 643 1917 699">91.00</td> </tr> </table>	12/07/2022	1 st week/1 st month	77.00		5 th week/2 nd Month	76.00		9 th week/3 rd Month	150.00	12/04/2022	1 st week/1 st month	69.00		5 th week/2 nd Month	94.00		9 th week/3 rd Month	91.00	<p>Effluent discharge at Pasir Panjang POM was through the Furrow System. Verified through site visit at P04/1 found the system were monitored and compliance with Jadual Pematuhan #004649.</p>	
12/07/2022	1 st week/1 st month	77.00																				
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>Mill has maintained monitoring of water usage for processing FFB which are recorded monthly. Water for processing is abstracted from water catchment by using pump. The trend of water usage is tandem with volume of FFB process. Refer Water Usage Record Pasir Panjang POM. Average data as below:</p> <table border="1"> <thead> <tr> <th data-bbox="1137 1018 1317 1107">Year</th> <th data-bbox="1317 1018 1532 1107">FFB Processed, MT</th> <th data-bbox="1532 1018 1729 1107">Water/L</th> <th data-bbox="1729 1018 1917 1107">Water/FFB</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 1107 1317 1165">2021</td> <td data-bbox="1317 1107 1532 1165">298,275.19</td> <td data-bbox="1532 1107 1729 1165">435,239.00</td> <td data-bbox="1729 1107 1917 1165">1.46</td> </tr> </tbody> </table>	Year	FFB Processed, MT	Water/L	Water/FFB	2021	298,275.19	435,239.00	1.46	Complied											
Year	FFB Processed, MT	Water/L	Water/FFB																			
2021	298,275.19	435,239.00	1.46																			

		2022 Tdt	277,636.37	424,028.00	1.53	
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>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2022. The document was reviewed/updated on February 2022. The estates and mill record and monitor the diesel utilization over the running hours of gen-set and other vehicles running. Performance variation in view of several factors as below:</p> <ol style="list-style-type: none"> 1. Infrastructure of estates, 2. Community size / no of gen-sets, 3. No. of vehicles / age of machine. 4. Weather interference / crop production volume <p>There is no opportunity for the estates to capitalize the utilisation of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.</p> <p>The Pasir Panjang POM and estate continued to monitor its diesel consumption and records were documented.</p> <p>The biogas plant that in progress to build up which generates electricity in future will improve the efficiency of fossil fuel consumption.</p>				Complied

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		<p>The diesel utilisation for the mill and estates is provided in the below table for period January 2022 to November 2022.</p> <table border="1"> <thead> <tr> <th>Estate / Mill</th> <th>Diesel, (MT)</th> <th>FFB, (MT)</th> <th>Diesel / FFB (MT)</th> </tr> </thead> <tbody> <tr> <td>Bukit Kelompok Estate</td> <td>186,043.00</td> <td>5,385.86</td> <td>2.96</td> </tr> <tr> <td>Pasir Logok Estate</td> <td>269,521.00</td> <td>35,350.85</td> <td>7.62</td> </tr> <tr> <td>Siang Estate</td> <td>441,288.62</td> <td>69,930.40</td> <td>6.31</td> </tr> <tr> <td>Pasir Panjang Estate</td> <td>475,501.00</td> <td>47,916.77</td> <td>10.07</td> </tr> <tr> <td>Pasir Panjang POM</td> <td>332,790.00</td> <td>277,636.37</td> <td>1.20</td> </tr> </tbody> </table> <p>Electricity utilisation for 2021 was 201,600.00 kWh and todate November 2022 was 184,800.00 kWh.</p> <p>For Biogas, Raw Effluent produced was 172,347.00 m3 and FFB processed 277,636.37 MT with average 0.62 m3/MT.</p> <p>Till November 2022, 172,347.00 MT raw effluent produced and 84,415.94 MT effluent discharge for Furrow, 162,347.00 MT effluent</p>	Estate / Mill	Diesel, (MT)	FFB, (MT)	Diesel / FFB (MT)	Bukit Kelompok Estate	186,043.00	5,385.86	2.96	Pasir Logok Estate	269,521.00	35,350.85	7.62	Siang Estate	441,288.62	69,930.40	6.31	Pasir Panjang Estate	475,501.00	47,916.77	10.07	Pasir Panjang POM	332,790.00	277,636.37	1.20	
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		<p>discharge to Biogas and 19,106.00 MT effluent discharge to compost with total discharge 275,868.94 MT.</p> <p>Shell and fiber were produced and use for boiler and sold to buyer. For todote Nov 2022, 34,480.19 MT fiber and 17,330.12 MT shell was produced.</p>	
<p>Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			
<p>7.10.1</p>	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>The GHG emissions are identified and assessed for the unit certification by sustainability team. RSPO GHG Calculator version 4 is used. The consumption of fertilisers and diesel were verified through Estates:</p> <ul style="list-style-type: none"> • FFB record book • Stock book • Monthly stock issue • Stock requisition note Mill • Mill Month End Production Report • Monthly production report • Flowmeter & running hours record book • Bio-gas generation daily monitoring log sheet 	<p>Complied</p>

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		Effluent analysis report Based on the verification of records; all the sampled issuance was traceable	
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	Not applicable since no new development by the certification unit.	Not Applicable
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Assessment of all polluting activities was conducted under Environmental Risk Assessment for identifying activities that contributes significant impact to environment including gaseous emission.</p> <p>As prescribed under DOE’s Compliance Schedule, the mill is obliged to conduct stack sampling minimum once a year. Below are the verified reports:</p> <p><u>2nd Half 2022</u></p> <ul style="list-style-type: none"> • Report no.: PPJ2-13/06/2022 • Report date: 27/06/2022 • Result: Dust: 237 mg/m³ (B5) vs limit 150, CO: 536 mg/m³ vs limit 1000 @ 12% CO₂ 	Complied

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		<p>Refer Lesen Pelanggaran JPLP/PUB/2022/005400 dated 13/01/2022 to 13/07/2022. Limit up to 250 mg/m3.</p> <p>For Air Pollution Control System, management use Electrostatic Precipitator (ESP) for monitoring</p> <p>Continuous Emissions Monitoring System (CEMS) which link to the DOE on real time base were monitored.</p> <p>Sighted Ambient Air Quality Monitoring Report as below:</p> <p><u>3rd Quarter 2022</u></p> <ul style="list-style-type: none"> • Report Number: PPJAmbient-15/09/2022 • Date Of monitoring: 18-20/09/2022 • Particulate matter: Point A1: 34 µg/m³ & Point 30: 18 µg/m³ • Limit: 100 µg/m³ <p>Sighted Online Environmental Reporting (OER) has been submitted to DOE on quarterly basis. The result within parameter as per Jadual Pematuhan AS(B)J31/152/000/007 Jilid 12(2)</p> <p>Environmental audit by 3rd party has been conducted by SR Environment Sdn Bhd dated 13/06/2022 with reference number SRE.KDH/2022/JAS/ECA/0648-PasirPanjang.</p>	
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Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area

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7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>There was no new planting and replanting which prepared by burning and in lined with Sustainability handbook has described therein on Environmental Policy (signed by the Executive Director) to include the adoption of Zero Open Burning Policy dated January 2008</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>Estates has established fire prevention SOP and control measures for their area. Refer Prosedur Pencegahan Dan Kawalan Kebakaran dated 01/08/2020. Kulim currently has an active subscription to Global Forest Watch in order to monitor the forest and any fires that occur within the concession area. Global Forest Watch (GFW) is an online platform that provides data and tools for monitoring fire and forests.</p> <p>On top of that, Estates already established ERP team and will perform Estate Patrol. The record of the patrolling was sighted. The patrolling is conducted daily by auxiliary police according to the patrolling schedule and also be conducted by workers and Mandore during daily operation.</p>	Complied
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>The certification units have engaged with adjacent stakeholders on fire prevention and control measures. The meeting was conducted using Microsoft Teams (Online). Refer Stakeholder Meeting dated 14/11/2022 for Pasir Panjang Complex. Refer section "Pencegahan Kebakaran Tanah Ladang/Kebun/Gambut". This meeting conduct to educate and inform the stakeholder neighbouring with estate regarding to Fire Management at estate area.</p>	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>Verified that there is no land development/ land clearing within Pasir Panjang Complex Unit since November 2005.</p>	<p>Complied</p>																						
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:</p>	<p>The Rapid Biodiversity Assessment of Fifteen Oil Palm Plantations of Kulim (M) Berhad Final Report July 2009 (Compiled from unchanged draft of July 2008). HCV assessment for the Pasir Panjang Complex was conducted by A.J.F.M Dekker (RSPO Assessor, HCV/Biodiversity) was available for verification. Sample of HCV Details as below:</p> <table border="1" data-bbox="1137 922 1948 1184"> <thead> <tr> <th>NO</th> <th>OU</th> <th>DISCRIPTIONS</th> <th>HCV CATEGORY</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>1</td> <td rowspan="4">PASIR PANJANG</td> <td>STEEP UNPLANTABLE (RBA 10)</td> <td>4</td> <td>18.09</td> </tr> <tr> <td>2</td> <td>RESERVOIR & BUFFER ZONE (RBA 5)</td> <td>4</td> <td>8.54</td> </tr> <tr> <td>3</td> <td>UNDEVELOPED FOREST (RBA 1)</td> <td>2</td> <td>64.88</td> </tr> <tr> <td>4</td> <td>STEEP UNPLANTABLE (RBA 2)</td> <td>4</td> <td>6.29</td> </tr> </tbody> </table>	NO	OU	DISCRIPTIONS	HCV CATEGORY	Ha	1	PASIR PANJANG	STEEP UNPLANTABLE (RBA 10)	4	18.09	2	RESERVOIR & BUFFER ZONE (RBA 5)	4	8.54	3	UNDEVELOPED FOREST (RBA 1)	2	64.88	4	STEEP UNPLANTABLE (RBA 2)	4	6.29	<p>Complied</p>
NO	OU	DISCRIPTIONS	HCV CATEGORY	Ha																					
1	PASIR PANJANG	STEEP UNPLANTABLE (RBA 10)	4	18.09																					
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3		UNDEVELOPED FOREST (RBA 1)	2	64.88																					
4		STEEP UNPLANTABLE (RBA 2)	4	6.29																					

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<p>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>	5		UNDEVELOPED FOREST (RBA 1)	2	32.46	
	6		POND & BUFFER ZONE (RBA 3)	4	0.65	
	7		STEEP (RBA 11PP)	4	4.90	
	8		STEEP (RBA 11PP)	4	4.09	
	9		UNDEVELOPED FOREST (RBA 9)	2	9.34	
	10		STEEP AREA (RBA 6)	4	1.68	
	11		GRASSLAND (RBA 3)	4	5.88	
	12		UNDEVELOPED FOREST (RBA 9)	2	0.25	
	13		SWAMPY (RBA 2)	4	23.52	
	14		POCKET FOREST (RBA 9)	2	60.86	
	15		RESERVOIR (RBA 1)	4	8.33	
	16		UNDEVELOPED FOREST (RBA 9)	2	6.78	
	17		UNDEVELOPED FOREST (RBA 9)	2	168.02	
	TOTAL					424.56
	1	SIANG		MANGROVE (RBA 2)	4	25.06
	2			MILL WATER CATCHMENT	4	3.68
	3			BUKIT CINA - LATERITE (RBA 5)	4	0.66
	4			RESERVOIR & INFAQ 1 WARISAN (RBA 1)	4	34.05

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	5		ABANDONED OLD PALM (RBA 7)	4	5.43
	6		POND (RBA 8)	4	2.01
	7		BALAU WATER CATCHMENT	4	0.22
	TOTAL				71.11
	1	BUKIT KELOMPOK ESTATE	BUFFER ZONE	4	0.26
	2		BUFFER ZONE	4	1.17
	3		BUFFER ZONE	4	1.06
	4		BUFFER ZONE	4	0.87
	5		BUFFER ZONE	4	0.51
	6		BUFFER ZONE	4	0.84
	7		BUFFER ZONE	4	3.61
	8		BUFFER ZONE	4	0.86
	9		BUFFER ZONE	4	0.95
	10		BUFFER ZONE	4	1.18
	11		BUFFER ZONE	4	0.5
	12		BUFFER ZONE	4	0.2
	13		BUFFER ZONE	4	1.62
	14		BUFFER ZONE	4	2.74
	15		BUFFER ZONE	4	1.31
	16		BUFFER ZONE	4	0.35
	17			RESERVOIR DIV A (RBA 2)	4

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		18		BUFFER ZONE	4	0.69		
		19		BUFFER ZONE	4	0.7		
		20		BUFFER ZONE	4	0.5		
		21		BUFFER ZONE	4	1.50		
		22		BUFFER ZONE	4	2.07		
		23		BUFFER ZONE	4	0.45		
		24		BUFFER ZONE	4	4.29		
		25		BUFFER ZONE	4	1.23		
		26		BUFFER ZONE	4	1.25		
		27		RESERVOIR DIV B (RBA 1)	4	3.17		
		28		BUFFER ZONE	4	1.54		
		29		BUFFER ZONE	4	0.89		
		TOTAL					41.19	
		1	PASIR LOGOK ESTATE	RESERVOIR & BUFFER ZONE (RBA 2)	4	4.08		
		2		EX- SAND MINING (RBA 1)	4	11.63		
		3		SWAMPY	4	1.69		
		TOTAL					17.4	
		The structure of the report generally has the description about methodology used, coverage and the findings on presence of HCV and RTE species.						

7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not applicable	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>Based on the report, there was no HCV or RTE presence in the plantation. Nonetheless, Pasir Panjang complex estate has its own self-declared conservation areas.</p> <p>Biodiversity Improvement Plan has been established at each sample estates. The management plan has included short-term and long-term plan. Among details in the plan as below:</p> <p>Short Term Plan</p> <ol style="list-style-type: none"> 1. RTE Species sighting record and training 2. Erosion control and risk checking 3. SQD Department to organize Bird Survey at respective unit <p>Long Term Plan</p> <ol style="list-style-type: none"> 1. Buffer zone establishment and training 2. Restore the natural vegetation from monitoring and training 3. Wildlife and Habitats protection of flora and fauna. <p>Regular security patrol and sighting within the estate was carried out and finding/issue recorded by the respective estate personal/security to monitor the conservation / buffer zone areas. Monitoring and control of any illegal hunting, fishing or collecting activities was also</p>	Complied

		implemented. Signage on prohibiting of illegal hunting and water polluting activities were verified on-site found to be satisfactorily maintained.	
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 -	No local communities have been identified in self-declared HCV areas within sampling Estate.	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 -	Although there is no RTE species identified at Sample Estates, there is evidence to continuously prevent and discourage illegal or hunting, fishing, or collecting activities. Signage as well as routine patrolling activities were carried out as part of the efforts to create awareness among employees about biodiversity. Sighted evidence of prohibiting of illegal hunting signage at sample estates. Verified through interview of workers found they have good awareness on it. Awareness Training on Biodiversity has been conducted on 23/03/2022 at Pasir Panjang Estate, 17/03/2022 at Bukit Kelompok Estate and 07/09/2022 at Siang Estate. Animal sighting has been recorded at Bukit Kelompok Estate and Pasir Panjang Estate. Verified the record no RTE has been recorded.	Complied

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<p>7.12.7</p>	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>The HCV management plan is developed based on recommendation given by the assessor dated 01/08/2022 based on email date. The plan includes monitoring of buffer zone area and conservation area in the estate and surrounding area.</p> <p>Monitoring of action plan was carried out at appropriate frequency as a mechanism to ensure effectiveness of implementation. Report of the monitoring was adequately recorded by the person in-charge on daily basis. Based on the report, no RTE sighted and no evidence of encroachment/trespasses at the identified HCV and conservation area. Management plan as per 7.12.4.</p> <p>Checked daily patrolling and sighting reports confirm that there was no RTE species and illegal activities reported.</p>	<p>Complied</p>
<p>7.12.8</p>	<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>Verified that there is no land clearing without prior HCV assessment since November 2005 occurred at Pasir Panjang Complex.</p>	<p>Complied</p>

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2021** for **Pasir Panjang Palm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2021** for **Pasir Panjang Palm Oil Mill** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.41
PKO	0

Extraction	%
OER	21.74
KER	5.53

Production	t/yr
FFB Process	298,275.19
CPO Produced	64845.33
PKO Produced	0

Land Use	Ha
OP Planted Area	21741.12
OP Planted on peat	0
Conservation (forested)	382.20
Conservation (non-forested)	302.25
Total	22425.57

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	130502.46	0.53	20222.13	0.41	0	0	150724.59	0.51
CO ₂ Emission from fertilizer	11296.40	0.05	2168.15	0.04	0	0	13464.55	0.05
NO ₂ Emission	8993.74	0.04	1549.69	0.03	0	0	10543.42	0.04
Fuel Consumption	5521.93	0.02	608.90	0.01	0	0	6130.83	0.02
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-123698.99	-0.50	-19167.89	-0.38	0	0	-142866.88	-0.48
Conservation Sequestration	-3490.19	-0.01	-9.52	-0	0	0	-3499.71	-0.01
Total	29125.34	0.12	5371.46	0.11	0	0	34496.81	0.12

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	7189.47	0.02
Fuel Consumption	409.48	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	-135.35	0.00
Sales of PKS	-8826.14	-0.03
Sales of EFB	0.00	0.00
Total	-1362.53	0.00

Summary of Kernel Crusher Emission and Credit (if applicable)

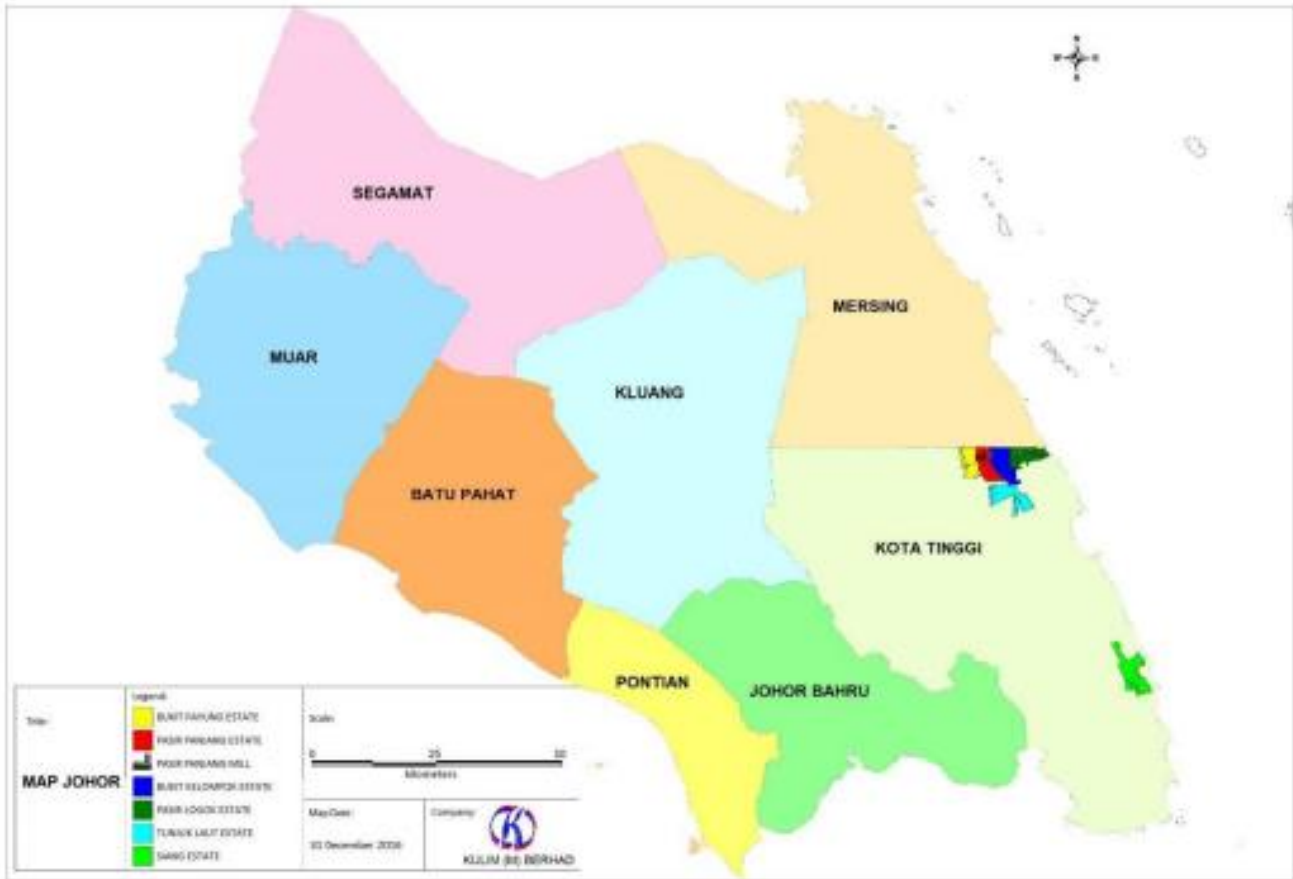
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0.00
Divert to anaerobic diversion (%)	100

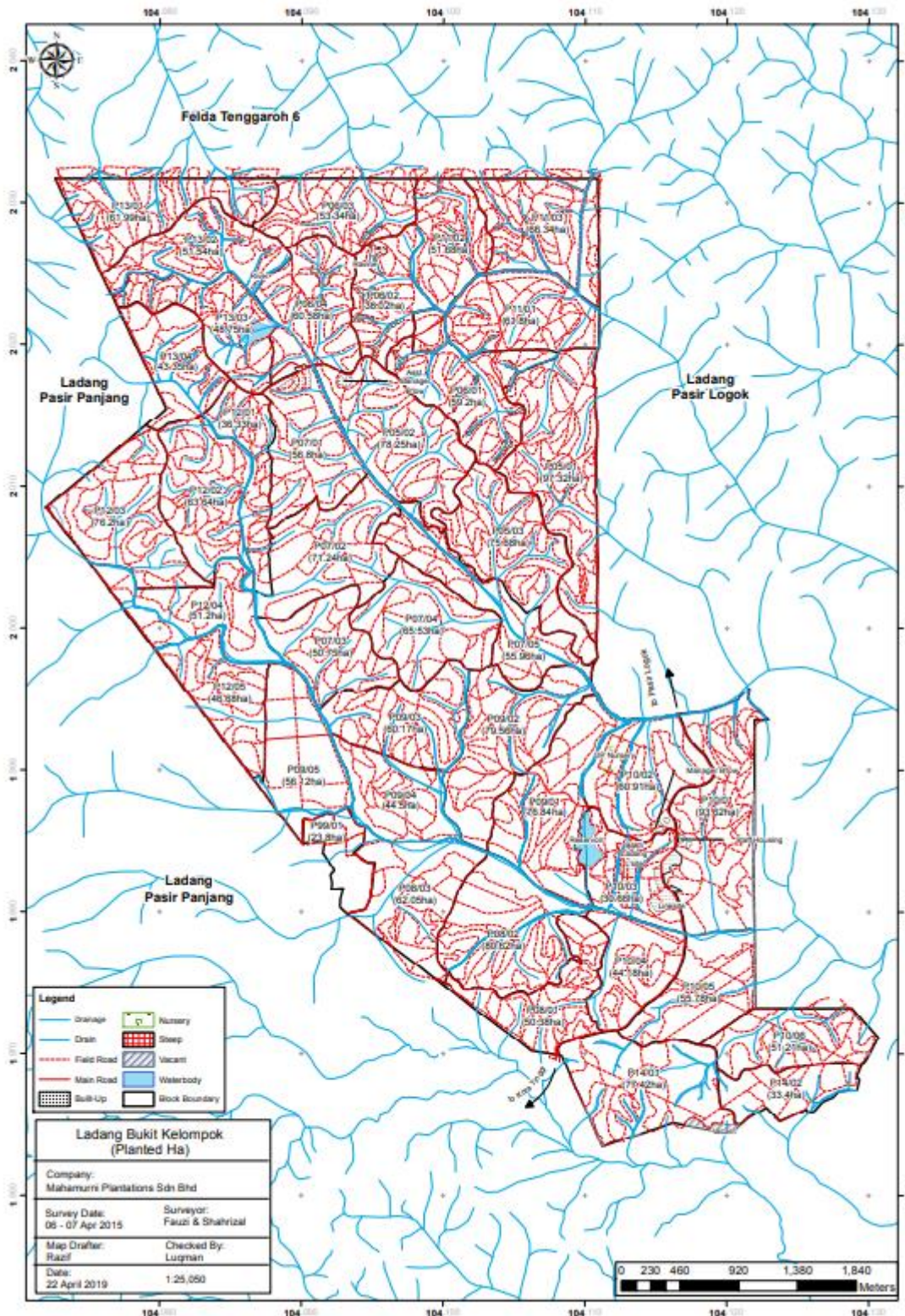
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	0.00
Divert to methane captured (flaring) (%)	53.91
Divert to methane captured (energy generation) (%)	46.09

Appendix C: Location Map of Certification Unit and Supply bases

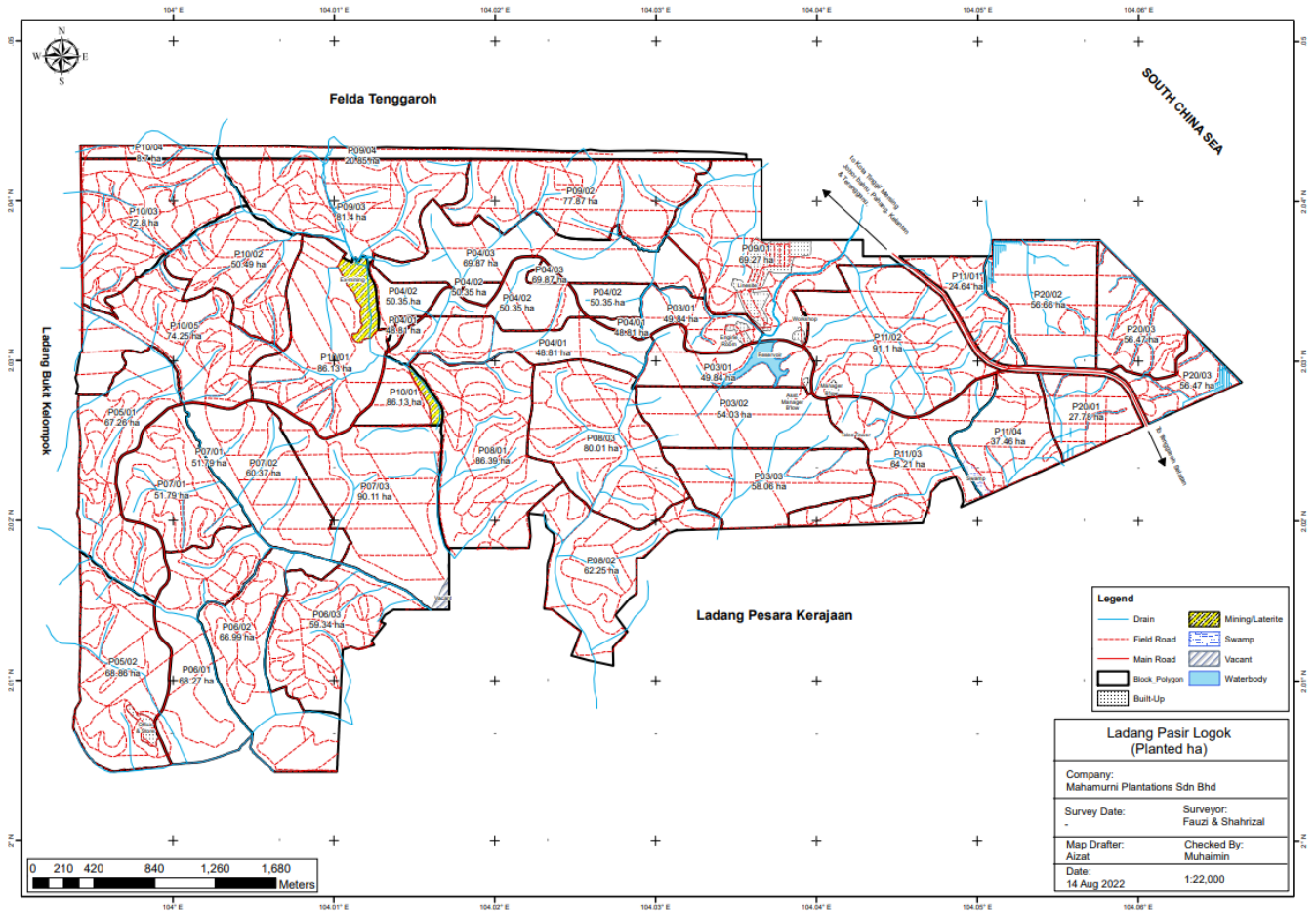


Appendix D: Estate Field Map

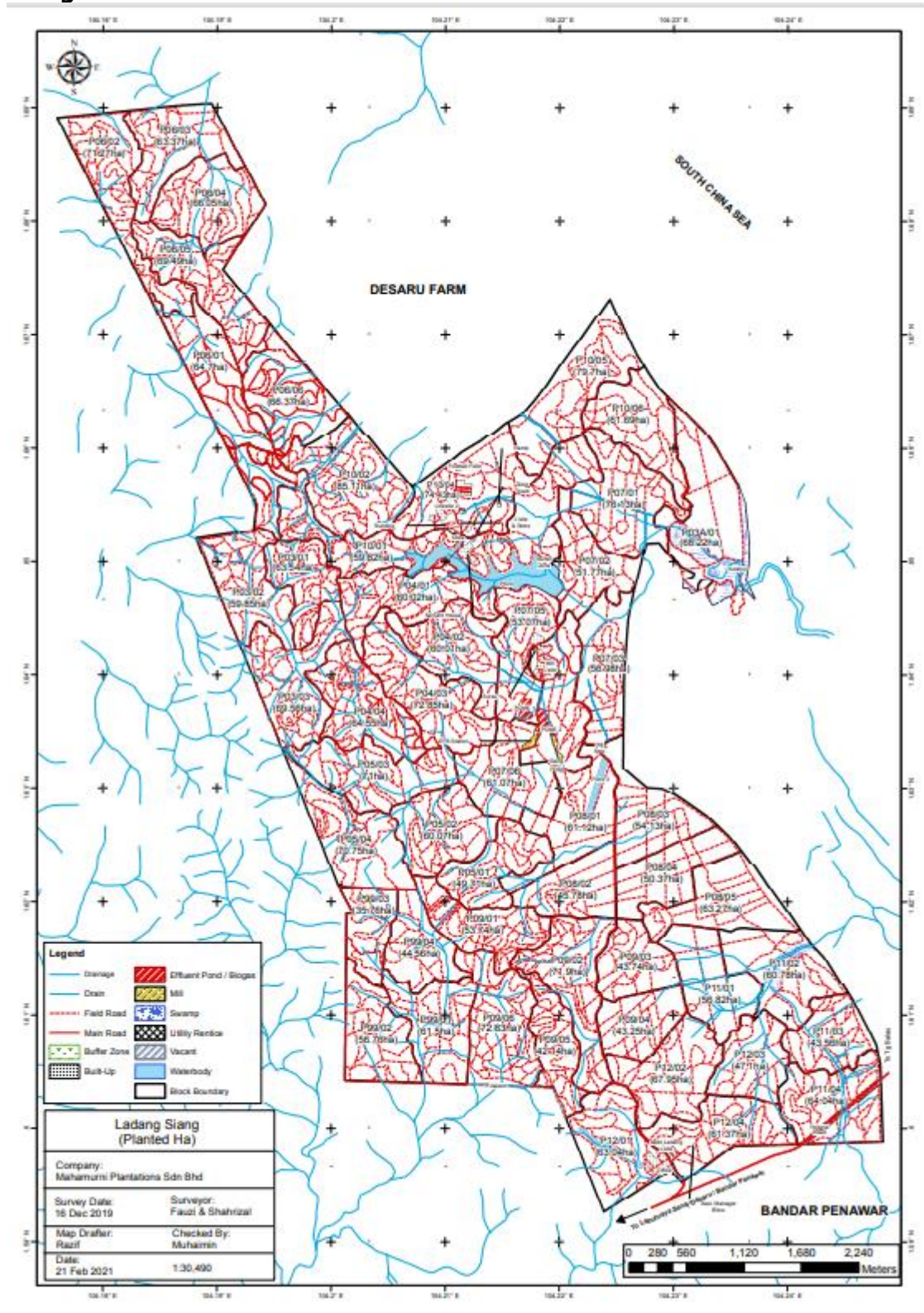
Bukit Kelompok Estate



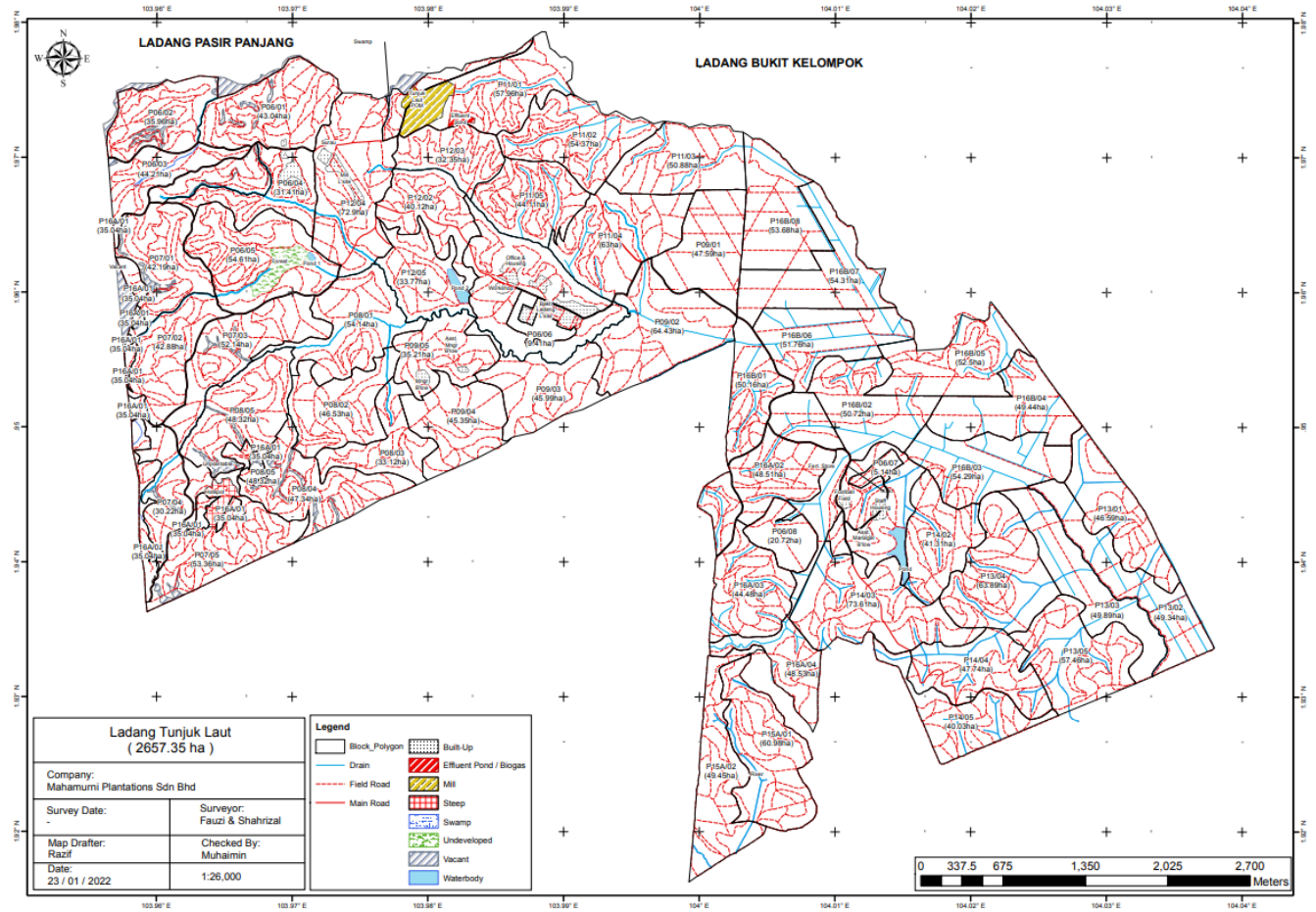
Pasir Logok Estate



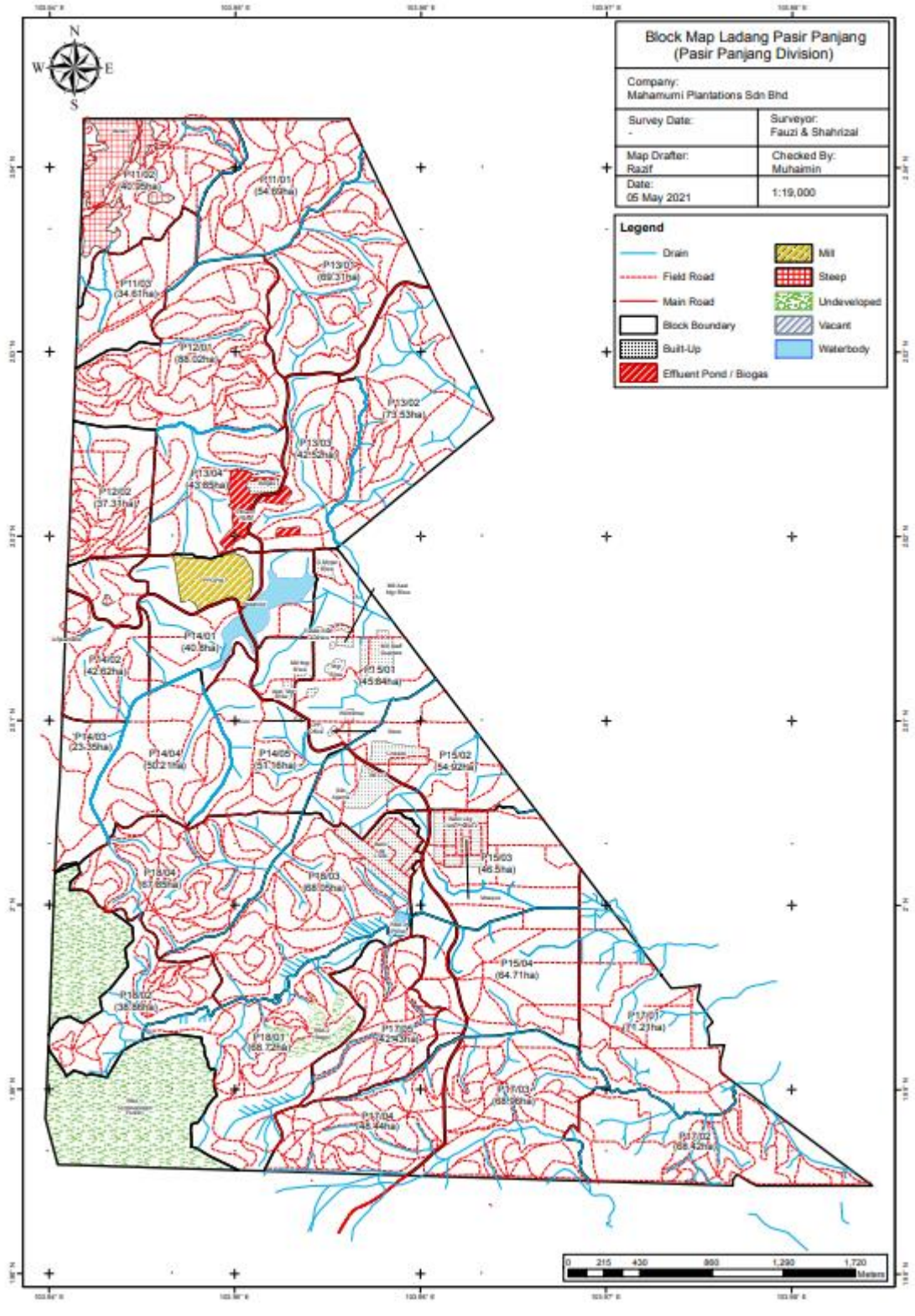
Siang Estate



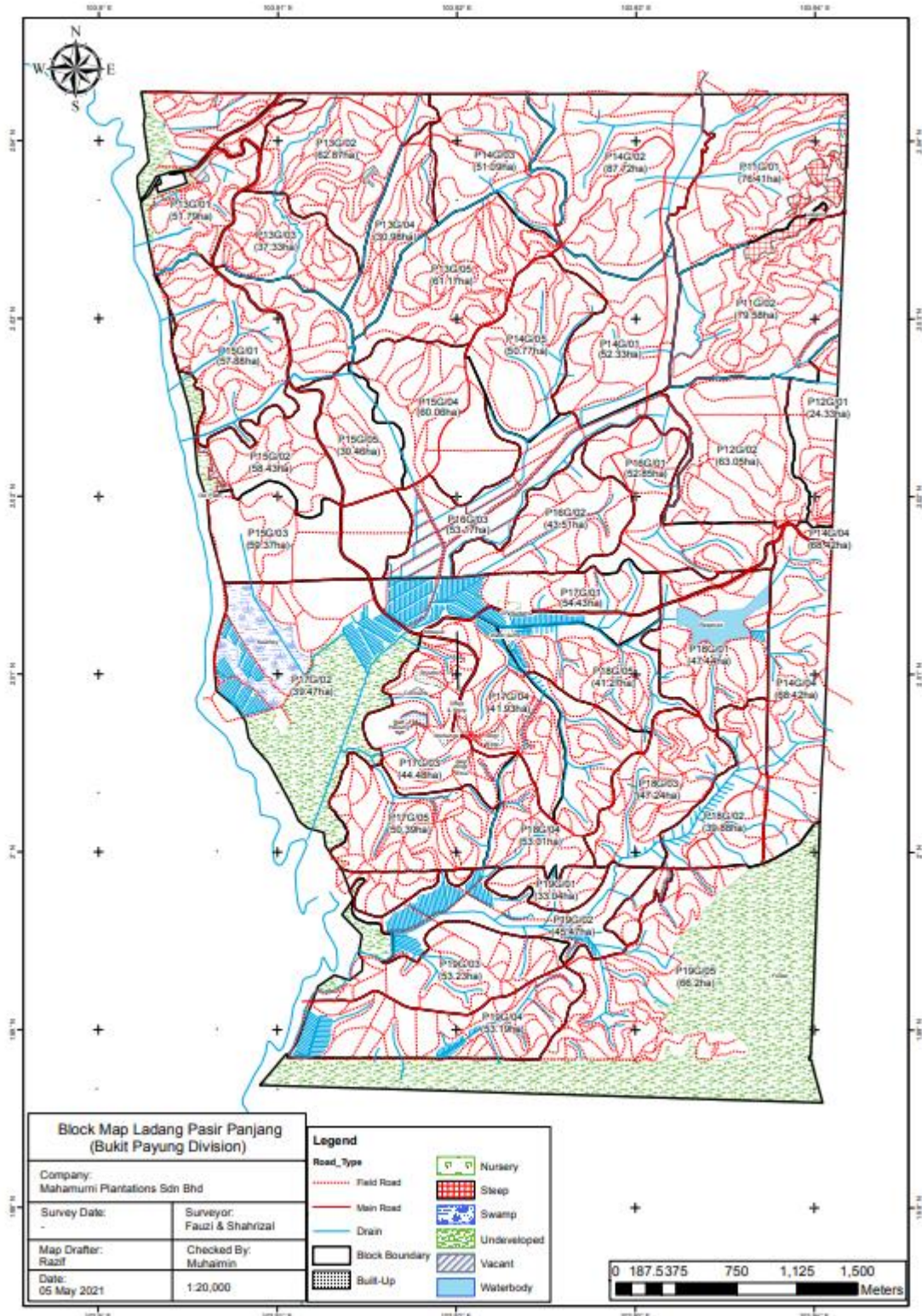
Tunjuk Laut Estate



Pasir Panjang Estate



Pasir Panjang Estate (Bukit Payung Division)



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