

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (3)
- Recertification Assessment (Choose an item.)
- Extension of Scope

Client Company Name / Parent Company: Boustead Plantations Berhad
Client Company / Parent Company Address: 10th, 11th & 18th Floor Menara Boustead, 69 Jalan Raja Chulan, 50200 Kuala Lumpur, Malaysia
Certification Unit: Telok Sengat Business Unit- Telok Sengat Palm Oil Mill
Location of Certification Unit: Lot 1292, Mukim Johor Lama, Telok Sengat, Kota Tinggi, 81900 Johor, Malaysia
Date of Final Report: 07/12/2023

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Boustead Plantations Berhad		
RSPO Membership Number	1-0012-04-000-00	Membership Approval Date	11/10/2004
Address	10th, 11th & 18th Floor Menara Boustead, 69 Jalan Raja Chulan, 50200 Kuala Lumpur, Malaysia.		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Telok Sengat Business Unit - Telok Sengat Palm Oil Mill		
Location / Address	Lot 1292, Mukim Johor Lama, Telok Sengat, Kota Tinggi, 81900 Johor, Malaysia		
Website	www.bousteadplantations.com.my		
Management Representative	Mitah Limpu / Azmariah Muhamed	E-mail	anuar@bplant.com.my
Telephone	03-2145 2121 ext. 829	Facsimile	+603-21447917

2. Certification Information			
Certificate Number	RSPO 697033	Certificate Start Date	11/09/2020
Date of First Certification	11/09/2020	Certificate Expiry Date	10/09/2025
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 3) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	40mt/hour
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 697047	MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services Malaysia Sdn Bhd	14/04/2024
MSPO 697045	MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills		14/04/2024
QMS 00292	ISO 9001:2015	SIRIM QAS International Sdn Bhd	08/09/2023

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Telok Sengat POM	Telok Sengat, 81900 Kota Tinggi, Johor	1° 34' 6.684" N	104° 2' 37.434" E
Telok Sengat Estate	Telok Sengat, 81900 Kota Tinggi, Johor	1° 34' 5.111" N	104° 2' 13.215" E
Chamek Estate	Jalan Paloh, 86009 Kluang, Johor	2° 8' 59.556" N	103° 15' 0.251" E
Kulai Young Estate	Jalan Sedenak, 81000 Kulai, Johor	1° 37' 32.235" N	103° 31' 48.684" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Telok Sengat Estate ₁	3,483.92	138.18	67.90	3,690.00	94.42
Chamek Estate ₂	795.60	-	21.30	816.90	97.39
Kulai Young Estate ₃	562.80	-	101.20	664.00	84.76
Total	4,842.32	138.18	190.40	5,170.90	93.65

Note:

- Telok Sengat Estate was resurveyed for replanting activity with rerouting of estate inner road/path which increased total hectareage. Previously unplanted (other) area has been demarcated as HCV area after resurvey.
- Total area in both Chamek Estate and Kulai Young Estate was wrongly switched between each other and reported in last year ASA report. This was verified during this assessment and comparison made to the earlier assessment confirmed that Chamek Estate area larger are than Kulai Young Estate.
- Managed area in Kulai Young Estate will keep on decreasing from year to year depend on the progress of the construction development by the landowner. For instance, this year's area reduced by another 6.50 ha.

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6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Telok Sengat Estate	257.40	1,559.93	1,608.59	58.00	3,226.52	257.40
Chamek Estate	82.70	185.40	450.40	77.10	712.90	82.70
Kulai Young Estate	25.70	159.60	281.70	95.80	537.10	25.70
Total (ha)	365.80	1,904.93	2,340.69	230.90	4,476.52	365.80

Note: Only Mature area is considered as production area

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Sep 22 – Aug 23)	Actual (Aug 22 – May 23)		Forecast (Sep 23 – Aug 24)
		Previous license period (Aug 22)	Current license period (Sep 22 – May 23)	
Telok Sengat Estate	77,500.00	7,119.73	44,892.00	72,000.00
Chamek Estate	10,970.00	1,157.74	9,101.90	12,400.00
Kulai Young Estate	9,200.00	599.18	4,387.80	6,000.00
Total	97,670.00	67,258.35		90,400.00

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Sep 22 – Aug 23)	Actual (Aug 22 – May 23)		Forecast (Sep 23 – Aug 24)
		Previous license period (Aug 22)	Current license period (Sep 22 – May 23)	
N/A		N/A	N/A	
Total		N/A		

Note: -

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9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Sep 22 – Aug 23)	Actual (Aug 22 – May 23)		Forecast (Sep 23 – Aug 24)
		Previous license period (Aug 22)	Current license period (Sep 22 – May 23)	
Eldred Estate	-	2,127.31	13,586.67	-
Bekoh Estate	-	2,449.82	13,316.87	-
Jaya Sewajar	-	61.25	426.22	-
UM Plantations	-	455.23	4,396.84	-
Rudijaya	-	232.32	1,163.95	-
Angtong Estate	-	391.31	1,076.26	-
Total	-	39,684.05		-

Note: -

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	Aug-22	8,956.65	5,637.24	14,593.89
2	Sep-22	8,698.87	5,344.61	14,043.48
3	Oct-22	7,678.30	3,910.72	11,589.02
4	Nov-22	7,667.22	4,378.35	12,045.57
5	Dec-22	7,743.83	4,266.55	12,010.38
6	Jan-23	6,703.61	3,643.37	10,346.98
7	Feb-23	4,742.54	2,941.78	7,684.32
8	Mar-23	4,702.91	2,907.80	7,610.71
9	Apr-23	4,480.57	2,982.72	7,463.29
10	May-23	5,883.85	3,670.91	9,554.76
TOTAL		67,258.35	39,684.05	106,942.40

Note: -

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10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Sep 22 – Aug 23)	Actual (Aug 22 – May 23)		Forecast (Sep 23 – Aug 24)
	Previous license period (Aug 22)	Current license period (Sep 22 – May 23)	
FFB	FFB		FFB
97,670.00 mt	8,956.65 mt	58,301.70 mt	90,400.00 mt
	TOTAL	67,258.35 mt	
CPO (OER: 21.50%)	CPO (OER: 21.31%)		CPO (OER: 21.00%)
21,000.00 mt	1,908.66 mt	12,424.09 mt	18,984.00 mt
	TOTAL	14,332.75 mt	
PK (KER: 4.50%)	PK (KER: 4.05%)		PK (KER: 4.10%)
4,395.00 mt	362.74 mt	2,361.22 mt	3,706.00 mt
	TOTAL	2,723.96 mt	
Note: -			

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Aug-22	1,908.66	362.74
2	Sep-22	1,634.03	319.98
3	Oct-22	1,458.21	291.62
4	Nov-22	1,432.71	286.24
5	Dec-22	1,540.96	290.70
6	Jan-23	1,318.73	265.72
7	Feb-23	1,184.24	222.09
8	Mar-23	1,181.22	218.56
9	Apr-23	1,178.35	207.41
10	May-23	1,495.64	258.90
	TOTAL	14,332.75	2,723.96
Note: -			

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11. Summary of Actual Volume sold					
Current License period (Sep 22 – May 23)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	4,409.30	-	-	7,074.35	11,483.65
PK (MT)	1,217.19	-	-	1,061.59	2,278.78
Credits	-	-	-	-	-
Previous License period (Aug 22)					
CPO (MT)	688.16	-	-	1,104.09	1,792.25
PK (MT)	192.74	-	-	168.10	360.84
Credits	-	-	-	-	-
Note: Conventional is RSPO certified material but sold as non-RSPO.					

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	AAA	RSPO_PO1000000UUU	2,700.53	-
2	BBB	RSPO_PO1000001VVV	998.57	-
3	CCC	RSPO_PO1000000 WWW	1,398.36	-
4	FFF	RSPO_PO1000002 XXX	-	1,158.73
5	GGG	RSPO_PO1000006 YYY	-	3.05
6	HHH	RSPO_PO1000007 ZZZ	-	248.15
TOTAL			5,097.46	1,409.93
Note: -				

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)
Nil	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A
Note: -				

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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	AAA	1,600.23	-
2	BBB	1,752.28	-
3	CCC	3,821.60	-
4	DDD	903.97	-
5	EEE	100.36	-
6	FFF	-	564.60
7	GGG	-	284.60
8	HHH	-	380.49
TOTAL		8,178.44	1,229.69

Note: -

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

Note: -

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (Sep 22 – Aug 23)			Actual (Aug 22 – May 23)			Forecast (Sep 23 – Aug 24)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IS-CSPO	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IS-CSPKO	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IS-CSPKE	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CSPK	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

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)
Nil	N/A	N/A	N/A	N/A	N/A	N/A

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TOTAL	N/A	N/A	N/A	N/A	N/A	N/A
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 (Sep 22 – May 23)							
Credits	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Previous License period (Aug 22)							
Credits	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A	N/A	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)
Nil	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
Note: -							

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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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 **12/06/2023 – 15/06/2023**. The audit programme is included as Section 2.3.

The approach to the audit was to treat the mill and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety.

The Critical NC close out was conducted off-site on 12/9/2023.

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

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

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

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Telok Sengat POM	✓	✓	✓	✓	✓
Telok Sengat Estate	✓	✓	✓	✓	✓
Chamek Estate	✓	✓	✓	✓	✓
Kulai Young Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: July 1, 2024 - July 5, 2024

Total Number of Mandays: 12

2.2 BSI Assessment Team

Name	Role	Competency
Hafriazhar bin Mohd Mokhtar (HMM)	Team Leader	<p>Education: Holds a Bachelor of Engineering (Hons.) Chemical Engineering, University Technology Malaysia.</p> <p>Work Experience: He has 20 years of working experience in multiple engineering disciplines emphasized on science, technology and sustainability. He acquired many skills from being involved in various industrial environments ranging from construction, plantation and mining before auditing. In summary, his started his career as Environmental Officer (2002-2003) in construction, Mill Engineer (2003-2008) in palm oil mill, Project Control Engineer (2008-2011) in mining and Auditor (2011-present) with accredited certification bodies.</p> <p>Training attended: He has completed Social Auditing & SMETA Training, HCV & HCS Introductory Training, ISO 45001 LA Training, MSPO LA Training, Endorsed RSPO SCCS LA Training, Endorsed RSPO P&C LA Training, ISO 9001 LA Training, ISO 50001 LA Training, ISO 14001 LA Training and RSPO ISH Auditor Training and Endorsed RSPO Auditor Refresher Training (P&C and SCCS).</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p>

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		<p>Aspect covered in this audit: Economic management plan, environment responsibility, environment impact assessment and management plan, natural and biodiversity conservation, Waste management, GHG, HCV, and RSPO supply chain requirements.</p>
Muhammad Fadzli Masran (MFM)	Team Member	<p>Education: Holds a Bachelor Degree in Forestry Science, graduated from University Putra Malaysia.</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, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO 9001 and ISO 14001 at Kulim Plantations.</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018, endorsed RSPO Lead Auditor Course in July 2018, MSPO Lead Auditor Course in October 2018, endorsed RSPO Supply Chain Certification training course in January 2019, MSPO Supply Chain Certification System (SCCS) Auditor training Course (MPOCC Endorsed), CQI and IRCA Certified ISO 9001:2015 Lead Auditor Training Course in April 2019, HCV and GIS Training in November 2019 SMETA Requirements Training in April 2021 and and Endorsed RSPO Refresher Trainings (P&C and SCCS).</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit: Legal Requirements, land & legal issue, Occupational health and safety requirement, HIRARC and management plan, training, mill best practices, estate best practices, peat and IPM management plan and RSPO supply chain requirements.</p>
Mohd Nur Amin bin Mohd Halim (MNA)	Team Member	<p>Education: Diploma Office Management & Technology, UiTM.</p> <p>Work Experience: He started his career as a sustainability practitioner in GLCs related to palm oil plantation for 6 years and 10 months, mainly handling operational excellence, environment & safety and health at the upstream and downstream operations. He then joined an international certification body over the last 3 years and started his auditing career as qualified lead auditor</p>

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		<p>for MSPO (OPMC and SCCS) schemes; and qualified auditor for ISCC Waste and Residue scheme. Concurrently, he was also the document controller and scheme coordinator for MSPO (OPMC and SCCS) accreditation.</p> <p>Training attended: He has completed Exemplar IMS (9001, 14001 & 45001) LA Course (2019), SA 8000 Course (2019), Endorse MSPO SCCS Course (2020), Endorse MSPO LA Course (2020), Endorse ISCC Waste and Residue Course (2020), HCV & HCS Course (2020), Endorse ISCC Basic & PLUS Course (2022), CQI & IRCA ISO 14001:2015 LA Course (2022) and Endorse RSPO P&C LA Course (2022).</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit: Policy and commitment, social requirements, contract agreement, human rights, workers’ welfare, smallholder welfare, Stakeholder Consultation.</p>
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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	HMM	MFM	MNA
Sunday, 11/6/2023	PM	Audit team travel to JB	✓	✓	✓
Monday, 12/6/2023 Day 1 Telok Sengat Estate	9:00 AM – 9:30 AM	Opening meeting @ Telok Sengat Estate <ul style="list-style-type: none"> • Opening presentation by audit team leader • Confirmation of assessment scope and finalize audit plan 	✓	✓	✓
	9:30 AM – 12:30 PM	Telok Sengat Estate Field visit: Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓

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Date	Time	Subjects	HMM	MFM	MNA
	10:30 AM – 12:30 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	-	-	✓
	12:30 PM – 1:30 PM	Lunch break	✓	✓	✓
	1:30 PM – 4:30 PM	Document Assessment P1 – P7: General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM, HCV records, SEIA documents & records, OSH records, assessment on pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> Auditors discussion Day 1 Interim Closing Briefing 	✓	✓	✓
Tuesday, 13/6/2023 Day 2 Chamek Estate	9:00 AM – 12:30 PM	Chamek Estate Field visit: Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓
	10:30 AM – 12:30 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	-	-	✓
	12:30 PM – 1:30 PM	Lunch break	✓	✓	✓
	1:30 PM – 4:30 PM	Document Assessment P1 – P7: SOPs, assessment on management plans, SEIA documents, GHG records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation	✓	✓	✓
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> Auditors' discussion Day 2 Interim Closing Briefing 	✓	✓	✓

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Date	Time	Subjects	HMM	MFM	MNA
Wednesday, 14/6/2023 Day 3 Kulai Young Estate	9:00 AM – 12:30 PM	Kulai Young Estate Field visit: Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓
	10:30 AM – 12:30 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	-	-	✓
	12:30 PM – 1:30 PM	Lunch break	✓	✓	✓
	1:30 PM – 4:30 PM	Document Assessment P1 – P7: SOPs, assessment on management plans, SEIA documents, GHG records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation	✓	✓	✓
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> Auditors’ discussion Day 3 Interim Closing Briefing 	✓	✓	✓
Thursday, 15/6/2023 Day 4 Telok Sengat POM	9:00 AM – 12:30 PM	Telok Sengat POM Mill visit: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, lab, weighbridge, and palm product storage area etc.	✓	✓	✓
	10:30 AM – 12:30 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	-	-	✓
	12:30 PM – 1:30 PM	Lunch break	✓	✓	✓

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Date	Time	Subjects	HMM	MFM	MNA
	1:30 PM – 4:00 PM	Document Review P1 – P7: SOPs, review on management plans, SEIA documents, GHG records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation RSPO SCC general requirements, supply chain for CPO mill, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	✓	✓	✓
	4:00 PM – 4:30 PM	<ul style="list-style-type: none"> Auditors’ discussion Preparation for Closing Meeting 	✓	✓	✓
	4:30 PM – 5:00 PM	Closing Meeting	✓	✓	-

Off-site Major Non-Conformity Close Out

PRELIMINARY AGENDA					
Date	Time	Subjects	HMM	MFM	MNA
Tuesday 12/09/2023 Microsoft Teams	09.0 – 09.15	Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan 	✓		
	09.00 – 12.00	Verification of Major NC CAP via Remote interview & Documents review of implemented evidence: <ul style="list-style-type: none"> 2354215-202306-M1 2354215-202306-M2 2354215-202306-M3 	✓		
	12:00 – 12:30	Closing meeting	✓		

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Yes. Please refer to appendix B for details on the mills and estates of Boustead Plantations Berhad.	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	The Loagan Bunut and Kanowit was delayed from year 2022 to 2023 due to COVID-19 and subsequently delayed further to 2024 with justification that the Company plans to postpone the certification to 2024 due to its plans to focus on certifying 1 certification unit (consisting of 1 mill and 5 supply bases) and 3 estates without mill in 2023. This has already been sent and approved by RSPO via latest ACOP submission as per link as following: https://document.rspo.org/2022/Boustead Plantations Berhad ACOP2022.pdf	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.	No new acquisitions after the last took place in 2018 involving Pertama Business Unit, Sabah from Duta Plantations Berhad and in 2019 involving Tawai Business Unit, Sabah from Sit Seng & Sons Realty Sdn Bhd. Certification plan for the last acquisition was as above and approved revised TBP in table below.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Deviations has been approved by RSPO via latest ACOP submission as per link above.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Changes due to COVID-19. This has already been sent and approved by RSPO via latest ACOP submission as per link as following: https://document.rspo.org/2022/Boustead Plantations Berhad ACOP2022.pdf	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No isolated lapses in the plan implementation as the plan approved by RSPO via latest ACOP submission as per link above.	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	No fundamental failure in the plan implementation as the plan approved by RSPO via latest ACOP submission as per link above.	Complied
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance	Neither any replacement of primary forest nor any area required to maintain or	Complied

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with RSPO P&C criterion 7.12.	enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12 in its Un-Certified Units or Holdings.	
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No new plantings since 1 st January 2010 that required compliance with the RSPO New Plantings Procedure in its Un-Certified Units or Holdings.	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 conflicts that required to be 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 in its Un-Certified Units or Holdings.	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	No labour disputes that required to be resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2 in its Un-Certified Units or Holdings.	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 that required to be addressed through measures consistent with the requirements of RSPO P&C criteria 2.1 in its Un-Certified Units or Holdings.	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Yes, the company conducted internal audit latest on March 2023 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. No non-compliance found and a positive assurance statement was available and justified.	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 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.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Yes, there was a stakeholder (including NGO) consultation conducted during internal audit done in March 2023.	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?	Not applicable as there are no scheme smallholders within the Telok Sengat Business Unit.	Not Applicable

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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.		
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Approved Time Bound Plan

#	Business Unit	Location	Main assessment	Certification status	Progress	Updated Information for Partial Certification, Clause 4.5.3 RSPO Time-bound Plan & 4.5.4 Requirements for uncertified management units
1	Sungai Jernih	Pahang	2009	Certified	N/A	N/A
2	Trong	Perak	2010	Certified	N/A	N/A
3	Telok Sengat	Johor	2018	Certified	N/A	N/A
4	Segaria	Sabah	2017	Certified	N/A	N/A
5	Segamaha	Sabah	2016	Certified	N/A	N/A
6	Nak	Sabah	2015	Certified	N/A	N/A
7	Lepan Kabu	Kelantan	Planned on 4 th quarter 2023	In progress	CB appointment process and the audit to be conducted in 4 th quarter 2023.	Nil
8	Bekoh	Johor	Planned on 4 th quarter 2023	In progress	CB appointment process and the audit to be conducted in 4 th quarter 2023.	Nil
9	Eldred	Johor	Planned on 4 th quarter 2023	In progress	CB appointment process and the audit to be conducted in 4 th quarter 2023.	Nil
10	Rimba Nilai (Sugut)	Sabah	Planned on 4 th quarter 2023	In progress	CB appointment process and the audit to be conducted in 4 th quarter 2023.	Nil
11	Pertama & Tawai	Sabah	Planned on 1 st quarter 2024	In progress	CB appointment process and the audit to be conducted in 4 th quarter 2023.	Nil
12	Loagan Bunut & Kanowit Tinjar	Sarawak	The company has put out a Request for Proposal (RFP) for all assets in Sarawak. The process for disposal is in progress and waiting for a potential buyer.	N/A	N/A	N/A

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 three (3) Critical; one (1) Minor nonconformities and two (2) Opportunity for Improvements raised. The Telok Sengat Business Unit - Telok Sengat 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 #	2354215-202306-M1	Issued Date	15/06/2023
Due Date	13/09/2023	Closure Date	12/09/2023
Indicator & Category (Critical / Minor)	6.2.4 (Major)		
Statement of Nonconformity:	Monitoring on visiting medical officer’s frequency was not effectively demonstrated.		
Requirement Reference:	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.		
Objective Evidence:	Based on the visit report by Dr. Hj. Moiz bin Siraj, the Visiting Medical Officer (VMO) lodged the report with dates in year 2023 from 11/01/2023, 06/02/2023, 16/03/2023, 03/04/2023, 09/05/2023 and 07/06/2023. However, the practice is not according with the requirement stated in Section 19 (3) of Workers' Minimum Standards of Housing and Amenities Act, 1990: Where a clinic exists on any estate or is established pursuant to an order under subsection (1), it shall be the duty of the employer to arrange for a registered medical practitioner to visit the clinic at least once a fortnight to supervise the operations and management of the clinic and to provide medical treatment to employees and their dependants.		
Corrections:	Revise the agreement to comply with the Section 19 (3) of Workers' Minimum Standards of Housing and Amenities Act, 1990, and conduct engagement with the VMO regarding the agreement revision.		
Root Cause Analysis:	Agreement between the estate and VMO was made without referring to the requirement of Section 19 (3) of Workers' Minimum Standards of Housing and Amenities Act, 1990.		
Corrective Actions:	Liaise with Legal & Compliance Department in reviewing contract agreement with VMO, yearly basis.		
Assessment Conclusion:	Off-site verification of CAP based on online interview emailed submissions of documented information evidence as following:		

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	<ul style="list-style-type: none"> - Revised Memorandum of Agreement (MOA) with Visiting Medical Officer (VMO) dated on 15/8/2023 based on quotation dated 7/7/2023 by appointed VMO i.e. Dr. Joiz Siraj of Klinik Moiz Sdn. Bhd. - Communications email with HQ Legal & Compliance Department on review of MOA on annual basis <p>Evidence of CAP confirmed to be effective to address the issue, hence Major Non-conformity has been closed on 12/9/2023.</p>
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Non-conformity			
NCR Ref #	2354215-202306-M2	Issued Date	15/06/2023
Due Date	13/09/2023	Closure Date	12/09/2023
Indicator & Category (Critical / Minor)	3.6.1 (Major)		
Statement of Nonconformity:	The risk assessment was not conducted as per SOP established.		
Requirement Reference:	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	<p>Boustead Plantations has revised established Standard Operating Procedure for risk assessment as per HIRARC Procedure. Refer SOP no. SSD/03/HRP-02, rev. 02 dated 25/01/2023.</p> <p>As verified during document review at Chamek Estate and Kulai Young Estate and Telok Sengat Estate it was noted that the format used for HIRARC register was not consistent with new format as Appendix 2-Hirarc Register Form.</p> <p>The Risk Score also still using the superseded level of score (21-25 Disastrous-Very High Risk, 16-20 Critical-High Risk, 11-15 Serious-Moderate Risk, 6-10 Significant-Low Risk, 10-5 Noticeable-Veri Low Risk), while new procedure level of score (15-25 High, 5-12 Medium, 1-4 Low).</p>		
Corrections:	<ul style="list-style-type: none"> - Request Sustainability & Safety Department to conduct training for revised established Standard Operating Procedure for risk assessment as per HIRARC Procedure. - Update estate's HIRARC using new format as Appendix 2 - HIRARC Register Form. 		
Root Cause Analysis:	<ul style="list-style-type: none"> - Staff at Chamek Estate, Kulai Young Estate, and Telok Sengat were not well verse with revised HIRARC procedure. - No dedicated person in-charge to monitor and update the risk assessment as per revised HIRARC procedure at Chamek Estate, Kulai Young Estate, and Telok Sengat Estate. 		
Corrective Actions:	<ul style="list-style-type: none"> - Conduct yearly training on HIRARC Procedure. - Appoint person in-charge to monitor and update risk assessment as per HIRARC Procedure at Chamek Estate, Kulai Young Estate, and Telok Sengat Estate. 		
Assessment Conclusion:	Off-site verification of CAP based on online interview and emailed submissions of documented information evidence as following:		

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	<ul style="list-style-type: none"> - Revised Appendix 2 - HIRARC Register Form dated July 2023 using latest (new) HIRARC template format. - Communications email with HQ Sustainability & Safety Department on training of new HIRARC template format <p>Evidence of CAP confirmed to be effective to address the issue, hence Major Non-conformity has been closed on 12/9/2023.</p>
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Non-conformity			
NCR Ref #	2354215-202306-M3	Issued Date	15/06/2023
Due Date	13/09/2023	Closure Date	12/09/2023
Indicator & Category (Critical / Minor)	2.2.2 (Major)		
Statement of Nonconformity:	The evidence of legal due diligence of contracted third parties was not satisfactorily demonstrated.		
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.		
Objective Evidence:	<p>1. Document review on the sampled transporter driver payslip and employment contract [IC No.: 660514-xx-xxxx] to Yewtan Enterprise for Telok Sengat POM has found that the employer made EPF contribution and deduction from employee's wages with incorrect amount from incorrect wages rate. The wages rate stated in employment contract and payslip is not in accordance with Sec. 5 (2), P.U.(A) 140, Minimum Wages Order 2022 dated 27/04/2022.</p> <p>2. Based on site visit, the groceries shop at Kulai Young Estate was found to have been storing rice and distributing them to the workers. However, there is no evidence that the shop has obtained legal permit from the relevant authority which is not in accordance with 'Wholesaler and Retailer Licensing 1996, Paddy and Rice Control Regulations, Control of Paddy and Rice Act 1994 (Act 522).'</p> <p>3. Document review of replanting contractor files at Telok Sengat Estate, employment contract and payslip for the contractor's workers is not available at the estate to monitor the wages, allowances, entitlements, rights, benefits or claim under the laws of in relation. This is not in accordance with Letter of Award: 2022 Land Preparation workers for Oil Palm Replanting in Telok Sengat Estate Kota Tinggi, Johor dated 17/02/2022. Which in section E (34) describes the main responsibilities of the contractor, along with the company, to ensure that the work to be carry out or being carried out to be frequently inspected and analysed to ensure full compliance with the company's policies.</p>		
Corrections:	<p>1. Mill had notified the Marketing Department (with support of the Sustainability & Safety Department) to review the contract agreements with the affected transporters as to ensure that wages paid to the transporters' employees are in accordance with the Minimum Wages Order 2022.</p> <p>2. Immediately notify Chop Teck Lee that a legal permit from the relevant authorities is required for storing rice and distributing it to workers. Estate management to monitor the application progress.</p>		

	3. Require replanting contractor’s employee latest employment contract, latest 3 months pay slip, and latest 3 months Borang 8A SOCSO.
Root Cause Analysis:	<ol style="list-style-type: none"> 1. No monitoring was done by Telok Sengat Mill as there was no staff who are well verse in regulatory requirement for wages to monitor contractor’s employee salary payment i.e., EPF contribution, and contractor’s employee contract agreement i.e., wages rate. 2. No monitoring was done by Kulai Young Estate as there was no dedicated staff to monitor groceries shop’s legal permit from the relevant authority. 3. No monitoring was done by Telok Sengat Estate as there was no dedicated staff to monitor replanting contractor employees’ employment contract and payslip.
Corrective Actions:	<ol style="list-style-type: none"> 1. Appoint PIC to monitor contractor’s employee salary/wages payment. Next, request training on the legal requirement related to wages from Legal & Compliance Department. All future contract agreements with transporters would need to be reviewed by the Legal & Compliance Department to ensure that it falls in line with all legal and industry minimum standard. 2. Appoint PIC to monitor required legal permit from the relevant authority for groceries shop and review the list of legal permit yearly basis. 3. Appoint PIC to monitor replanting contractor’s employee salary/wages payment.
Assessment Conclusion:	<p>Off-site verification of CAP based on online interview and emailed submissions of documented information evidence as following:</p> <ul style="list-style-type: none"> - Notification email dated on 28/6/2023 by Telok Sengat POM to HQ Marketing Department personnel on review of contract agreements with transporter to reflect on compliance with applicable legal requirements including Minimum Wages Order 2022 - Copy of records for Chop Teck Lee SSM registration to include rice storage and distribution license as per Form A Registration of Business Rules 1957 Ref. # EB-A2023062800992 dated 28/6/2023 and SSM registration certificate # 202303165809 (TR0286683-H); Validity period: 1/7/2023 – 30/6/2025 - Copy of records for contractor’s workers work agreement dated 1/12/2022, July 2023 EPF contribution form dated 7/8/2023, SOCSO contribution (8A) form dated 7/8/2023 and payslips for April 2023, May 2023 & June 2023 salary - Appointment letter of Telok Sengat POM Chief Clerk as PIC to monitor contractor’s employee salary/wages payment dated 1/8/2023 - Appointment letter of Kulai Young Estate Chief Clerk as PIC to monitor compliance of vendor dated 20/6/2023 - Appointment letter of Telok Sengat Estate Supervisor as PIC to monitor contractor’s employee salary/wages payment dated 8/8/2023 <p>Evidence of CAP confirmed to be effective to address the issue, hence Major Non-conformity has been closed on 12/9/2023.</p>

Non-conformity			
NCR Ref #	2354215-202306-N1	Issued Date	15/06/2023
Due Date	Next assessment	Closure Date	Open

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Indicator & Category (Critical / Minor)	7.8.1 (Minor)
Statement of Nonconformity:	Implementation of water management plan in place was insufficient to promote more efficient use and continued availability of water sources.
Requirement Reference:	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: 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.
Objective Evidence:	Based on the visit in Chamek Estate, sighted the piping system previously use for beneficial plant nursery found improperly connected causing leaks and water puddle on the ground near the office. This indicated that the implementation of water management plan in place was insufficient to promote more efficient use and continued availability of water sources.
Corrections:	<ul style="list-style-type: none"> - Identify the leak source and repair the pipe connection. - Drain puddles by creating temporary drainage and level the ground to ensure no puddles are created.
Root Cause Analysis:	No dedicated staff to monitor the implementation of Water Management Plan
Corrective Actions:	Appoint person in-charge to monitor the implementation of Water Management Plan
Assessment Conclusion:	CAP has been accepted. Verification of evidence on effectiveness of CAP to be conducted during next assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	<p>Clause : 6.1.5 2354215-202306-I1</p> <p>The management may improve the agenda in minutes of Gender Committee meeting for discuss of all related issues on improving women at workplace.</p>
OFI 2	<p>Clause : 7.3.2 2354215-202306-O1</p> <p>Detail documents on the disposal/landfill sites use by domestic wastes collected by domestic waste contractors in Kulai Young and Telok Sengat Estate could be demonstrated further.</p>

Positive Findings	
PF #	Description
PF 1	Good positive relationship maintained and highlighted by internal and external stakeholders.
PF 2	Good implementation of best agricultural practices.

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2235530-202208-M1	Issued Date	12/08/2022
Due Date	11/11/2022	Closure Date	04/10/2022
Indicator & Category (Critical / Minor)	3.4.1 (Critical)		
Statement of Nonconformity:	Social Impact Assessment has not been done for new operation/activities.		
Requirement Reference:	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.		
Objective Evidence:	<p>There is no evidence that social impact assessment has been done for both activities.</p> <ol style="list-style-type: none"> 1. Kulai Young Estate has been purchased by SIPP Power Sdn Bhd based on sale and purchase agreement dated 28/09/2021 and currently is being managed by Boustead Agency and Consultancy Services Sdn Bhd. 2. Kulai Young Estate has established a program, "Corporate Smart Internship" with collaboration with Jabatan Penjara Malaysia which recruited inmate under parole as probation workers. 		
Corrections:	Liaise with Sustainability & Safety Department to conduct social impact assessment for the change of estate management and recruitment inmate under parole program.		
Root Cause Analysis:	Estate management was not aware that social impact assessment (SIA) needs to be done for the change of estate management and recruitment inmate under parole program as no competent person in social aspect present at the estate.		
Corrective Actions:	<ol style="list-style-type: none"> 1. Appoint PIC to monitor social aspect i.e., Social Impact Assessment, Social Impact Management Plan. 2. Conduct training for appointed PIC on social aspect i.e., Social Impact Assessment, Social Impact Management Plan. 3. Develop social impact management plan based on SIA recommendation, consideration from the outcomes of stakeholder consultation, accident record, complaint and grievances record. 4. Review the social impact management plan yearly basis. 		
Assessment Conclusion:	<p>Critical Non-Conformity Close Out Verification.</p> <ol style="list-style-type: none"> 1. Kulai Young Estate have produced a memo dated 26/08/2022 to the Sustainability and Safety Department (SSD) to conduct the Social Impact Assessment (SIA) in regard to the 2 issues that were raised. SSD in return have replied in a memo dated 08/09/2022 (Reference Number: SSD/SIA/Sep22/01/AM/ml), stating that they have proposed the Social Impact Assessment to be conducted on 12/09/2022 at the estate. The Assessment Plan was available for verification which included site inspection and interview with workers and estate management. Also verified the Announcement Notice from Kulai Young Estate to the estate workers dated 09/09/2022, stating that the Social Impact Assessment is to be carried out on 12/09/2022. 2. Kulai Young Estate have appointed Ms. Noor 'Aqilah binti Astar as the person in-charge to monitor Social Impact Aspects at the estate as stated in the appointment 		

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	<p>letter dated 05/09/2022, undersigned by the Estate manager which was available for verification.</p> <p>3. A training was conducted on 21/09/2022 via Microsoft Teams by SSD for the appointed PIC as mention above. Topics discussed was on Social Impact Assessment and Management Plans. Records of trainings were available for verification.</p> <p>4. A Social Impact Assessment was conducted on 12/09/2022 at Kulai Young Estate, attended by the SSD team, Management Representatives and Workers. The minutes of meeting for the Social Impact Assessment was available for verification. The meeting had discussed on the identification of the impacts due to change of ownership from Boustead Plantations Berhad to SIPP Power Sdn Bhd and Program Corporate Smart Internship (ODP). The results were well minute and available for verification.</p> <p>5. A Supplementary Document: Social Impact Assessment (SIA) Report for Kulai Young Estate has been established dated 12/09/2022. The report states the conclusion on the assessment done on the 2 issues that have been raised as above. The report was available for verification.</p> <p>6. The Social Impact Plan has been updated to include the action plan where it is stated to "conduct social Impact Assessment on a yearly basis and whenever there are any new or changes in operations.</p> <p>The correction and corrective actions have been conducted and deemed to be appropriate to address the raised Critical Non-Conformity. Hence the Critical Non-Conformity is successfully closed on 04/10/2022.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>On-site verification conducted during ASA visit found CAP has been implemented accordingly.</p> <p>There is no new planting in all estates within Boustead Telok Sengat Business Unit. Review on the Social Impact Assessment (SIA) report, BPB maintained the current report cover operating units include Telok Sengat POM, Telok Sengat Estate, Kulai Young Estate, Chamek Estate, Eldred Estate and Bekoh Estate. The assessment conducted on 02/04/2018 until 10/04/2018.</p> <p>The assessment was conducted in the palm oil mill and all five estates, involving internal stakeholders, local communities, government agencies, NGOs and other relevant parties whose participation and contribution was vital to the assessment. Issues raised by the stakeholders were incorporated into a management plan. Social profile such as social background of employees, background of local community, education, safety, and health, living condition, infrastructure and amenities and stakeholder engagement were assessed accordingly. The findings of the assessments together with the recommendations for social impact management and mitigation are presented in the report.</p> <p>Hence, Major NC remained closed.</p>

Non-conformity			
NCR Ref #	2235530-202208-M2	Issued Date	12/08/2022
Due Date	11/11/2022	Closure Date	07/10/2022
Indicator & Category (Critical / Minor)	3.8.12 (Critical)		

Statement of Nonconformity:	There has been evidence of false claim for RSPO Certified CPO and PK.
Requirement Reference:	Record keeping. 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).
Objective Evidence:	The mill produces RSPO Certified and Non-Certified CPO and PK. Based on the Mass Balance Accounting it was seen that the mill have sold RSPO Non- Certified CPO and PK as RSPO Certified, back dated from January 2022 – July 2022. As of July 2022, the mill has sold 7,531.31 Mt of uncertified CPO and 958.66 Mt of uncertified PK as RSPO Certified products. The accounting records have not been balanced back to positive stock.
Corrections:	<ol style="list-style-type: none"> 1. Revise sales contract to change types of CPO and PK despatched from certified to conventional. 2. Immediately stop dispatching/selling RSPO certified CPO and PK until accounting records return to positive stock. 3. Sell 7,531.31mt of CPO and 1328.28 mt of PK certified to non-certified to balance back the negative stock.
Root Cause Analysis:	Lack of awareness on RSPO Mass Balance contract sales / requirement
Corrective Actions:	<ol style="list-style-type: none"> 1. Monthly Crop Forecast Declaration (SOP) review by HQ. Then, HQ to conduct training. 2. Mill to appoint PIC to monitor Mass Balancing sheet and conduct appropriate training. 3. Marketing Department to appoint PIC to monitor Mass Balance Sales Contract for Telok Sengat POM.
Assessment Conclusion:	<p>Critical Non-Conformity Close Out Verification.</p> <ol style="list-style-type: none"> 1. The Senior Manager of Boustead Estate Agency Sdn Bhd (Marketing Department) have issued a memo (Reference Number: 011/2022/mhm/cm) dated 12/08/2022 stating to fulfil the sales of 7,600.00 mt of CPO and 1,360.00 mt of PK as CPO/PK conventional from September 2022 – December 2022. An correspondence memo (Reference Number: 013/2022/mhm/cm) dated 04/10/2022 was issued stating “we concluded that no more certified CPO and PK will be despatched as MB product until all the outstanding oversold noncertified CPO/PK was despatched as certified product are fully compensated”. 2. Verified the CPO and PK despatch Summary for September 2022. It was verified that there were no sales of MB Certified CPO or PK done by the mill. Sales of RSPO Certified CPO and PK has been stopped by the mill as of 17/08/2022. Current sales of CPO & PK are all as conventional products. 3. Sustainability and Safety Department Standard Operating Procedure; Supply Chain and traceability Procedure; Doc Number: SSD/01/SCT-01; Issue Date: 25/01/2022; Revision Date: 09/09/2022 was verified. The SOP was revised on Long Term Sales Declaration. A training on the procedure has been conducted on 05/10/2022 and records were available for verification. 4. Telok Sengat POM has appointed En. Hazmi bin Ramli as the PIC to monitor RSPO Supply Chain – Mass Balance Records as stated in the appointment letter (Reference Number: TSM/22/143) dated 20/08/2022, undersigned by the Mill Engineer which was available for verification.

	<p>5. A Training on Mass Balance & Sales Declaration has been conducted by Sustainability & Safety Department on 22/09/2022 via Microsoft Teams for Telok Sengat Business Unit. The training discussed on the usage of the newly introduced Mass Balance accounting template and the basic requirements of RSPO Supply Chain System.</p> <p>6. Boustead Estates Agency Sdn Bhd – Marketing Department has appointed Clarence Maslamoney and Suhana Surani as the PIC to monito Mass Balance Sales Contract for Boustead Mills as stated in the appointment letter (Ref Number: 012/2022/mhm/cm) dated 03/10/2022 undersigned by the Senior Manager, BEASB Marketing Department which was available for verification.</p> <p>The correction and corrective actions have been conducted and deemed to be appropriate to address the raised Critical Non-Conformity. Hence the Critical Non-Conformity is successfully closed on 07/10/2022.</p>
<p>Effectiveness Closure (for previous audit closed Critical NC):</p>	<p>On-site verification conducted during ASA visit found CAP has been implemented accordingly.</p> <p>As per SOP established under section 4.6 Material Accounting System (Fixed Inventory Periods).</p> <p>i) Reviewed the records of certified CPO and PK for the period of August 2022 – May 2023. All the RSPO certified materials received, and produce were found to be accurate, complete, up to-date and accessible based on sample daily production records and mass balance spreadsheet etc.</p> <p>ii) As per SOP established under section 4.1.4 Record Keeping stated that retention times for all records and reports shall be a minimum of three (3) years and shall comply with legal and other regulatory requirement.</p> <p>iii) All receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK are recorded on a real-time basis in the mill’s Daily Production Report for period of August 2022 to May 2023.</p> <p>As MB Module certified unit, Telok Sengat POM record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis based on daily production and delivery report. No conversion ratios as actual production extraction volumes are measured on daily basis. No short sell as the mill delivered from positive stocks available</p> <p>Hence, Major NC remained closed.</p>

Non-conformity			
NCR Ref #	2235530-202208-N1	Issued Date	12/08/2022
Due Date	15/06/2023	Closure Date	Escalated to Major NC
Indicator & Category (Critical / Minor)	2.2.2 (Minor)		
Statement of Nonconformity:	Contractor unable to demonstrate compliance towards legal requirement.		
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		

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	(licensed/ accredited) for migrant workers, service providers and labour contractors, is available.
<p>Objective Evidence:</p>	<p><u>Kulai Young Estate</u> Memorandum of agreement dated 28/01/2022 between the management and Cipta Melati Enterprise and between Distinction One Sdn Bhd on 03/06/2022.</p> <p>1) There is no evidence that, the estate management has monitored payment for 1 lorry driver that is working for Distinction One Sdn Bhd.</p> <p>2) Sample taken for 3 foreign workers under Cipta Melati Enterprise and sighted SOCSO contribution rate was not paid according to Akta Keselamatan Social 1969, sample taken for month April 2022 – June 2022.</p> <p>3) Sample taken for 3 foreign workers under Cipta Melati Enterprise, overtime for workers has not been paid as per latest wages rate. Sighted base on sample of pay slips for April and May 2022 where the workers has been paid based on rate RM8.65/hour instead of RM10.86/hour as per regulations.</p> <p>Stated in clause 41, that the contractor needs to strictly adhere and comply to requirement and provision under listed act and regulation. And clause 37, that the contractor needs to maintain proper records and workers’ payroll as required by the labour department and must ensure that all his workers are fully paid every month with reasonable price/ fair rates.</p> <p><u>Telok Sengat Estate</u> Sample of workers selected for 8 contractors’ workers and SOCSO contribution has been verified for March and July 2022. It has been found out that contribution has not been made according to Akta Keselamatan Social 1969. Stated in clause 41, that the contractor needs to strictly adhere and comply to requirement and provision under listed act and regulation. And clause 37, that the contractor needs to maintain proper records and workers` payroll as required by the labour department and must ensure that all his workers are fully paid every month with reasonable price/ fair rates.</p>
<p>Corrections:</p>	<p><u>Kulai Young Estate</u> 1. Obtain copies of pay slip and EPF deduction for work done in January 2021 until current for Distinction One’s lorry driver. 2. Inform Cipta Melati Enterprise regarding the underpaid SOCSO. Cipta Melati Enterprise compensate the underpaid SOCSO contribution started from January to June 2022. Obtain the copy compensated SOCSO contribution. 3. Inform Cipta Melati Enterprise regarding rate of overtime payment as per regulation. Cipta Melati Enterprise compensate the underpaid overtime. Obtain the copy of pay slip for month of April and May 2022.</p> <p><u>Telok Sengat Estate</u> Inform contractors regarding the SOCSO contribution. Contractors to compensate the unpaid SOCSO contribution for his 8 workers.</p>
<p>Root Cause Analysis:</p>	<p><u>Kulai Young Estate</u> There is no dedicated staff appointed to monitor and check contractor’s employee payment. Therefore, no monitoring and checking done by the estate against the contractor to ensure that the contractor's employees are paid based on legal requirements.</p>

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	<p><u>Telok Sengat Estate</u> There is no dedicated staff appointed to monitor and check contractor’s employee payment. Therefore, no monitoring and checking done by the estate against the contractor to ensure that the SOCSO contributions are paid based on legal requirements.</p>
Corrective Actions:	<p><u>Kulai Young Estate</u> 1. Appoint PIC to monitor contractor’s employee’s payment. 2. Monitor and review contractor’s employee’s payment every month.</p> <p><u>Telok Sengat Estate</u> 1. Appoint PIC to monitor contractor’s employee’s payment. 2. Monitor and review contractor’s employee’s SOCSO contribution every month.</p>
Assessment Conclusion:	<p>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. Evidence of CAP implementation verified during on-site assessment visit confirmed to be effective to address the issue with no recurrence. Hence, Minor NC has been closed.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>On-site verification conducted during ASA visit found CAP has been implemented accordingly. However, there were other issues found within the same indicator: The evidence of legal due diligence of all contracted third parties was not satisfactorily demonstrated.</p> <p>Refer to P.U.(A) 140, Minimum Wages Order 2022 dated 27/04/2022 of Section 5 (2) 'Berhubung dengan seorang pekerja yang tidak dibayar gaji pokok tetapi dibayar gaji hanya berdasarkan upah ikut kerja, berat tan, tugas, perjalanan atau komisen, kadar gaji bulanan yang kena dibayar kepada pekerja itu berkuat kuasa mulai 01/01/2023 hendaklah tidak kurang daripada MYR1,500.00.</p> <p>Sampled the payslips of transporter driver [IC No.: 66xx] to Yewtan Enterprise, CPO transporter in Telok Sengat POM found made EPF contribution and deduction from employee’s wages with incorrect amount from incorrect wage rate. Currently, the Minimum Wages Order 2022 rate is MYR1,500.00.</p> <p>Refer to Perlesenan Pemborong dan Peruncit 1996, Peraturan-peraturan Kawalan Padi dan Beras, Akta Kawalan Padi dan Beras 1994.</p> <p>Based on site visit, the groceries shop at Kulai Young Estate was found to have been storing rice packages and distributing them to the workers. However, there is no evidence that the shop has obtained legal permit from the relevant authority for this activity.</p> <p>Telok Sengat Estate management did not monitor employment contract and payslip for replanting contractor’s workers.</p> <p>Hence, the Minor NC has been escalated as Major NC as per Major NC # 2354215-202306-M3.</p>

Non-conformity			
NCR Ref #	2235530-202208-N2	Issued Date	12/08/2022
Due Date	15/06/2023	Closure Date	12/06/2023

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Indicator & Category (Critical / Minor)	4.2.3 (Minor)
Statement of Nonconformity:	The stakeholders were not informed on the progress of the raised complaints/grievance.
Requirement Reference:	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.
Objective Evidence:	<p>Social management plan documented for all estates and POM in the document title social action plan 2022.</p> <p>For Telok Sengat Estate, several issues have been identified and action plan has been established for issues highlighted. Sample taken for grievance mechanism and sighted that the management need to implement effective grievances mechanism in all records of complaints and mitigation action must be documented.</p> <p>Workers Representative Meeting (20/07/2022) and Gender Committee Meeting (20/07/2022) have been verified where some of the outcomes have been classified as compliant/grievances. Details as per below</p> <ol style="list-style-type: none"> a. Complaint on social issues at housing compound b. Wild dogs, bats and crow at housing compound c. Request to increase school bus allowance. <p>Verification has been made and identified that the complaint received from both meetings have not been responded within the timeline as per stated in the SOPs.</p>
Corrections:	<ol style="list-style-type: none"> 1. Record the complaint regarding wild dogs, bats and crow, and social issues at housing compound in the complaint form and conduct further investigation. 2. Conduct discussion on request to increase school bus allowance and inform the outcomes to the affected parties.
Root Cause Analysis:	No follow-up was done regarding the complaint recorded during workers representative meeting and gender committee meeting dated 20/07/2022 due to no competent person on this matter.
Corrective Actions:	<ol style="list-style-type: none"> 1. Develop complaint logbook to record any complaint/grievances raised during any meeting. Then, record the complaint in the complaint form. 2. Appoint PIC and train by SSD department to monitor complaints/grievance by workers. 3. PIC Communication follows up the complaint/grievance within 24 hours to initiate the investigation. 4. Conduct investigation within the timeline as per stated in the complaint and grievance SOP.
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. Evidence of CAP implementation verified during on-site assessment visit confirmed to be effective to address the issue with no recurrence. Hence, Minor NC has been closed.
Effectiveness Closure (for previous audit closed Critical NC):	On-site verification conducted during ASA visit found CAP has been implemented accordingly with evidence of effectiveness to address the issue with no recurrence. BPB maintain the current Grievance Procedures Doc. No.: HR/2022/023/003, Rev.0, Issues: 01/03/2022.

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	<p>Document review on complaints book and stakeholder consultation interview with no complaints raised as at audit.</p> <p>Latest complaints at Chamek Estate, Kulai Young Estate, Telok Sengat POM and Telok Sengat Estate are related to housing maintenance. Reviewed Grievance Form (Internal & External) sighted complaints been taken and action been notified by assistant manager and completed within timeline as per procedure.</p> <p>Onsite interview with sampled among workers and invited external stakeholders informed they been briefed on Grievance Procedures during Internal Workers Meeting and External Stakeholders meeting.</p> <p>Hence, Minor NC has been closed on 12/6/2023.</p>
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Non-conformity			
NCR Ref #	2235530-202208-N3	Issued Date	12/08/2022
Due Date	15/06/2023	Closure Date	12/06/2023
Indicator & Category (Critical / Minor)	7.3.2 (Minor)		
Statement of Nonconformity:	The disposal of waste material was not in accordance to the procedure.		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	<p>During site visit and verification, the below evidence was sighted:</p> <p><u>Kulai Young Estate</u></p> <p>1. Clinical waste was generated from the estate clinic however it was not identified in the waste inventory as per latest Fifth Schedule – Inventory of Schedule Waste dated 21/07/2022. It was not in line with SOP Schedule Waste Management Issue 1 Rev 01 dated June 2017 Section 9.2 “Regulation of 11 of Environmental Quality (Schedule Waste) Regulation 2005 requires a waste generator (estate/mill) to keep accurate and up to date inventory of quantity and categories of schedule waste being handled (generated, threatened, and disposed of)”.</p> <p>2. Other than that, it was noticed that empty lubricant container from the contractor COST-WIN was placed at the field PM2014D area near their cabin area. It was not in line with SOP Schedule Waste Management Issue 1 Rev 01 dated June 2017 Section 8.0 Storage of Schedule Waste (8.1) (a) “A proper designated area in the mill/estates premises, away from the manufacturing/processing area and area of employee’s activities”.</p> <p><u>Telok Sengat Estate</u></p> <p>3. During site visit at Schedule Waste Store, Telok Sengat Estate, it was found that, date generated of the SW was not stated at the label for SW409. It was not in line with SOP Schedule Waste Management Issue 1 Rev 01 dated June 2017 Section 7.3 Labelling Waste Information: Besides the symbolic label has to be pasted on the container, mill/estate is required to be labelled clearly the following information (a) The date when the schedule wastes are first generated.</p>		

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Corrections:	<p><u>Kulai Young Estate:</u></p> <ol style="list-style-type: none"> 1. Re-identify Scheduled Waste present in estate and update the Identification of Scheduled Wastes List. Update clinical waste in eSWIS (Inventory of Scheduled Wastes) and estate’s scheduled waste record book. 2. Conduct briefing and training to contractor COST-WIN on company’s policy and procedure in regard to scheduled wastes. <p><u>Telok Sengat Estate:</u></p> <ol style="list-style-type: none"> 1. Inspect and label the date generated on SW409 as per SOP Schedule Waste Management Issue 1 Rev 01 dated June 2017 Section 7.3 Labelling Waste Information.
Root Cause Analysis:	<p><u>Kulai Young Estate:</u></p> <ol style="list-style-type: none"> 1. Lack of understanding of scheduled waste among estate management personnel, therefore, clinical waste is not identified as Scheduled Waste. Record of clinical waste was not maintained due to no activity of clinical except for dispensary at estate’s clinic. 2. No monitoring on contractor COST-WIN activity since it was not part of estate operation. <p><u>Telok Sengat Estate:</u></p> <ol style="list-style-type: none"> 1. No monitoring on schedule waste labelling.
Corrective Actions:	<p><u>Kulai Young Estate</u></p> <ol style="list-style-type: none"> 1. Record clinical waste in eSWIS inventory and estate’s scheduled waste record book monthly basis. 2. Appoint PIC on monitoring Scheduled Waste. <p><u>Telok Sengat Estate</u></p> <ol style="list-style-type: none"> 1. Appoint PIC to monitor scheduled wastes. 2. Conduct monitoring and inspection every time scheduled wastes were generated.
Assessment Conclusion:	<p>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. Evidence of CAP implementation verified during on-site assessment visit confirmed to be effective to address the issue with no recurrence. Hence, Minor NC has been closed.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>On-site verification conducted during ASA visit found CAP has been implemented accordingly with evidence of effectiveness to address the issue with no recurrence. Based on waste categories, disposal method demonstrated as per procedures and in compliance with legal requirements. The SOP for Scheduled Waste disposal is established as Boustead Plantations - Scheduled Waste Management; Date: June 2017. Scheduled Waste management records including inventor and disposal consignment maintained via “E-SWISS”. SW in the mill was disposed via DOE registered disposal contractor as following:</p> <ul style="list-style-type: none"> - Telok Sengat POM: Modern Energy Sdn Bhd Pasir Gudang Johor; DOE licence # 004762 valid until 30/4/2024

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	<p>- Telok Sengat Estate, Chamek Estate & Kulai Young Estate: 5E Resources Sdn Bhd DOE licence # 003892 valid until 30/4/2024</p> <p>Latest disposal recorded as following:</p> <table border="1"> <thead> <tr> <th>Site</th> <th>Date</th> <th>SW types</th> </tr> </thead> <tbody> <tr> <td>Telok Sengat POM</td> <td>11/05/2023</td> <td>410, 409 & 305</td> </tr> <tr> <td>Telok Sengat Estate</td> <td>11/05/2023</td> <td>409</td> </tr> <tr> <td>Chamek Estate</td> <td>12/10/2022</td> <td>Extension until December 2023</td> </tr> <tr> <td>Kulai Young Estate</td> <td>09/03/2023</td> <td>410 & 409</td> </tr> </tbody> </table> <p>Domestic waste generated from workers quarters was disposed either in land fill for the or via local authority collection as following:</p> <table border="1"> <thead> <tr> <th>Site</th> <th>Disposal method</th> </tr> </thead> <tbody> <tr> <td>Telok Sengat POM</td> <td>Local council collection</td> </tr> <tr> <td>Telok Sengat Estate</td> <td>Local council collection</td> </tr> <tr> <td>Chamek Estate</td> <td>Landfill in field # PM 2001B</td> </tr> <tr> <td>Kulai Young Estate</td> <td>Local council collection</td> </tr> </tbody> </table> <p>Kulai Young Estate despatched to MDK landfill via services of ODEFSKI Enterprise centralized collection at PM 14A. However, detail documents on the disposal/landfill sites use by domestic wastes collected by domestic waste contractors in Kulai Young and Telok Sengat Estate could be demonstrated further. Hence, an OFI has been raised on the matter.</p> <p>Hence, Minor NC has been closed on 12/6/2023.</p>	Site	Date	SW types	Telok Sengat POM	11/05/2023	410, 409 & 305	Telok Sengat Estate	11/05/2023	409	Chamek Estate	12/10/2022	Extension until December 2023	Kulai Young Estate	09/03/2023	410 & 409	Site	Disposal method	Telok Sengat POM	Local council collection	Telok Sengat Estate	Local council collection	Chamek Estate	Landfill in field # PM 2001B	Kulai Young Estate	Local council collection
Site	Date	SW types																								
Telok Sengat POM	11/05/2023	410, 409 & 305																								
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Telok Sengat Estate	Local council collection																									
Chamek Estate	Landfill in field # PM 2001B																									
Kulai Young Estate	Local council collection																									

Opportunity for Improvement	
OFI#	Description
OFI 1	<p>2235530-202208-01 Clause: 6.2.2</p> <p>All workers have been provided with employment contract and there is evidence that it has been signed by both parties (management/workers) for all sites. It can be further improved by standardizing the employment contract format for all estates and POM.</p> <p>Verification / Follow-up actions:</p> <p>Document review on sampled workers’ employment contracts, sighted the document been translated with various languages includes Bahasa, English and others language of workers’ origin countries. The contract stipulates terms of conditions of service such position, period of employment, types of work, responsibilities of employer, responsibilities of employee, salary payable, working hours, annual leave, sick leave, deductions, overtime, public holiday entitlement, maternity leave, reasons for dismissal, period of notice, facilities, etc.</p> <p>Both mill and estate workers collective agreements been included with MAPA/NUPW additional agreement in-line with Minimum Wage Order 2020.</p>
OFI 2	<p>2235530-202208-02</p>

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	<p>Clause: 3.8.12</p> <p>The monitoring of the mass balance records could be further improved to clearly indicate the amount of CPO and PK carried forward to the following month.</p> <p>Verification / Follow-up actions:</p> <p>Reviewed the records of certified CPO and PK for the period of August 2022 – May 2023. All the RSPO certified materials received, and produce were found to be accurate, complete, up to-date and accessible based on sample daily production records and mass balance spreadsheet etc.</p>
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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)
1817083-201908-M1	Major	5.2.2	30/08/2019	Closed on 14/08/2020
1817083-201908-M2	Major	6.1.3	30/08/2019	Closed on 14/08/2020
1817083-201908-M3	Major	2.1.1	30/08/2019	Closed on 14/08/2020
1817083-201908-M4	Major	SCCS 5.3.2	30/08/2019	Closed on 14/08/2020
1817083-201908-M5	Major	SCCS 5.5.1	30/08/2019	Closed on 14/08/2020
1817083-201908-M6	Major	SCCS 5.8.1	30/08/2019	Closed on 14/08/2020
1817083-201908-M7	Major	SCCS 5.13.1	30/08/2019	Closed on 14/08/2020
1817083-201908-N1	Minor	5.3.3	30/08/2019	Closed on 08/07/2021
1817083-201908-N2	Minor	1.3.1	30/08/2019	Closed on 08/07/2021
1817083-201908-N3	Minor	2.1.3	30/08/2019	Closed on 08/07/2021
1817083-201908-N4	Minor	6.5.3	30/08/2019	Closed on 08/07/2021
1817083-201908-N5	Minor	6.12.2	30/08/2019	Closed on 08/07/2021
2077371-202107-M1	Major (Critical)	3.8.9	08/07/2021	Closed on 24/09/2021
2150250-202112-N1	Minor	7.3.3	17/01/2022	Closed on 12/08/2022
2235530-202208-M1	Critical	3.4.1	12/08/2022	Closed on 04/10/2022
2235530-202208-M2	Critical	3.8.12	12/08/2022	Closed on 07/10/2022
2235530-202208-N1	Minor	2.2.2	12/08/2022	Escalated to Major NC
2235530-202208-N2	Minor	4.2.3	12/08/2022	Closed on 15/06/2023
2235530-202208-N3	Minor	7.3.2	12/08/2022	Closed on 15/06/2023
2354215-202306-M1	Critical	6.2.4	15/06/2023	Closed on 12/09/2023
2354215-202306-M2	Critical	3.6.1	15/06/2023	Closed on 12/09/2023
2354215-202306-M3	Critical	2.2.2	15/06/2023	Closed on 12/09/2023
2354215-202306-N1	Minor	7.8.1	15/06/2023	Open

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3.4 Stakeholders and previous landowner / 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 Telok Sengat Business Unit- Telok Sengat 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)
Internal Union	NUPW Representative Chairmans (Elected)	Face to face interview
Internal Grocer Shop	Kedai Runcit Yang Kok Joon & Chop Teck Lee	Face to face interview
Contractor	Distinction One Sdn. Bhd	Face to face interview
Internal Communities	Persatuan Wanita	Face to face interview

Stakeholders comment	
1	<p>Feedbacks:</p> <p>A contractor interviewed is Distinction One Sdn Bhd, who's a provide services on FFB transportation from estates.</p> <p>Onsite interview, contractor agreed that good relationship has been established between Boustead Plantations Berhad's managements. He informed that he understands on the standard provided by Chamek Estate and Kulai Young Estate to be follow before started work in each estate's field. Outcome from the interview, the contractor informed his company's payment terms with Boustead Plantations Berhad's is within 30 days.</p> <p>The contractor informed he been invited into stakeholders' consultation meeting annually by Camek Estate and Kulai Young Estate and being briefed regarding RSPO & MSPO standards and requirement.</p> <p>Audit Team verification and response:</p> <p>Document review on the invoice and payment voucher from sampled estate verified the payment is meet the timeline.</p> <p>Document review on stakeholder consultation meeting from sampled estates verified the contractor's name is in the attendance list.</p> <p>No further issues of concern.</p>

<p>2</p>	<p>Feedbacks: Onsite interviewed with elected union representatives from estates inform they are agreed have good relationship established with their estates managements. They are welcome management for the supportive on building relations and help to workers needs in especially related to amenities and facilities of their members’ wellbeing. They have proposal to estates’ managements on ensuring the current relationship between both parties remain unchanged and will continue for the good of increased the quality life of workers living.</p> <p>Audit Team verification and response: Managements appreciated on the positive commentary from union. Managements will always have remained these good communications. No further issues of concern.</p>
<p>3</p>	<p>Feedbacks: Grocer Kedai Runcit Yang Kok Joon & Chop Teck Lee which located in estate compound. The shopper informed they been briefed by the management on the grocery prices offered to customers at affordable prices. Based on external stakeholder minutes of meeting, the management invite shopper to discuss the agenda on affordable price offered to workers and the requirement of RSPO applied management. Both shoppers informed that they share and displayed list of groceries and foods prices at their shops as initiative of transparency by the shoppers. However, the shop was found to have been storing rice and distributing them to the workers. No evidence that the shop has obtained legal permit from the relevant authority which is not in accordance with ‘Wholesaler and Retailer Licensing 1996, Paddy and Rice Control Regulations, Control of Paddy and Rice Act 1994 (Act 522).</p> <p>Audit Team verification and response: Document review sighted the list of grocery prices and foods sold at both shops at Kedai Runcit Yang Kok Joon & Chop Teck Lee. From the external stakeholders’ minutes of meeting, sighted Kulai Young Estate invited shopper to discuss on the affordable prices of goods and foods offer. Based on the visit, a Non-conformance being raised due to no legal permit from relevant authority to retail and distribute of rice from the shop.</p>
<p>4</p>	<p>Feedbacks: Persatuan Wanita representatives for each operating been interviewed. Based on the interview, there is evidence that all female workers can participate in gender committee and has been invited for meeting that will be conducted every three months. As per interview, it has been confirmed that grievance procedure for any harassment has been communicated and all representatives can demonstrate their understanding on the procedure. Other than that, pregnancy test has not been conducted for female workers but only self-assessment on pregnant symptom such as menstrual delay will be submitted online on monthly basis. Representative also has been asked on discrimination and has been confirmed there is no discrimination has been practiced. All female workers received same benefits, leave and others. New mother assessment has been conducted for each operating units and has been confirmed no new mothers as at this round of audit.</p> <p>Audit Team verification and response: Managements will always have remained these good communications to feedback from female staffs and workers of any form of harassment or discrimination to comply as company policy. Document review on ‘Persatuan Wanita’ minutes of meeting from sampled estates verified the meeting is conduct at every three months and attended by female staffs and workers as committee member. No further issues of concern.</p>

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List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Not applicable as the estates have undergone 2nd cycle of replanting.					

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

3.5 Impartiality and conflict of interest

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

Formal Signing-off of Assessment Conclusion and Recommendation

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Telok Sengat Business Unit - Telok Sengat Palm Oil Mill 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 Telok Sengat Business Unit- Telok Sengat Palm Oil Mill is certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Hafriazhar Mohd. Mokhtar	Name: Mitah Limpu
Company Name: BSI Services Malaysia Sdn. Bhd.	Company Name: Boustead Plantations Berhad
Title: Client Manager	Title: Sustainability Executive
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: 25/09/2023	Date: 09/10/2023

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>Information on environmental, social, and legal issues relevant to RSPO Criteria was made available by Boustead POM and Estates certification units includes Boustead Telok Sengat Business Unit - TSBU) to relevant stakeholders.</p> <p>During onsite visit to Telok Sengat POM, Chamek Estate, Kulai Young Estate and Telok Sengat Estate observed public documents available been kept by management. The documents include with land titles, HCV Assessment Reports, negotiation procedure, complaint records, RSPO public summary reports, management plans and company policies also available upon request.</p>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Onsite visit to Telok Sengat POM, Chamek Estate, Kulai Young Estate and Telok Sengat Estate observed public documents available been kept by management. The documents include with land titles, HCV Assessment Reports, negotiation procedure, complaint records, RSPO public summary reports, management plans and company policies also available upon request.</p> <p>Based on the visit, information available displayed at board in operation unit area includes negotiation procedure, complaint flowchart and company policies are in both English and Bahasa. Onsite interview with invited stakeholder and sampled workers informed they able to locate the information displayed and easily accessible to them.</p>	Complied

<p>1.1.3</p>	<p>(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -</p>	<p>Records of request for information and responses are maintained by Telok Sengat POM, Chamek Estate, Kulai Young Estate and Telok Sengat Estate managements.</p> <p>Review on the file sighted the feedback form is available to been verified. Boustead Telok Sengat Business Unit acquired all feedback form during internal meeting with workers and external stakeholder meeting to response accordingly on any feedback and request.</p> <p>The internal meeting with workers conducts as follow.</p> <ol style="list-style-type: none"> 1. Chamek Estate on 19/05/2022 and 27/02/2023. 2. Kulai Young on 11/03/2023. 3. Telok Sengat Estate on 02/04/2023. 4. Telok Sengat POM on 10/04/2023 <p>While for external stakeholders meeting conduct annually as follow.</p> <ol style="list-style-type: none"> 1. Chamek Estate on 05/08/2022. 2. Kulai Young on 22/06/2023. 3. Telok Sengat Estate and Telok Sengat POM on 09/06/2023. 	<p>Complied</p>
<p>1.1.4</p>	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -</p>	<p>BPB maintain the current Communication Procedure established and been implemented by Telok Sengat POM, Chamek Estate, Kulai Young Estate and Telok Sengat Estate managements from appendixes documents include External Communication Form (PKSJ-001) and Communication Record (PKSJ-002).</p> <p>The procedure describes management to handle communication for internal and external stakeholders. The methods of communication such as formally write in, through phone call, discussion or meeting and etc. The record of communication with the internal and external stakeholder was available and verified during audit. The implementation was followed as per procedure.</p>	<p>Complied</p>

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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>Telok Sengat POM, Chamek Estate, Kulai Young Estate and Telok Sengat Estate managements continued and updated the stakeholders' information includes the address, contact number, nominated representatives. The list which included the contractors, vendors/suppliers, foreign recruitment agencies, embassy, government agencies, schools, local communities, CPO/PK customers, etc.</p> <p>The updated list as follows.</p> <ol style="list-style-type: none"> 1. Chamek Estate updated on 19/04/2023. 2. Kulai Yong Estate update on 05/05/2023. 3. Telok Sengat Estate update on 16/05/2023. 4. Telok Sengat POM update on 24/05/2023. 	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<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>BPB implemented in all business operations and transactions its Code of Ethics & Conduct established as commitment to maintain the highest standards of integrity and professionalism in its business dealings. The company will ensure they do business in a transparent, appropriate, and fair manner. There were 6 principles that all the employees must observe in the Code of Conduct as below:</p> <ol style="list-style-type: none"> 1. To avoid conflict of interest. 2. To avoid misuse of position. 3. To prevent misuse of information gained through the Group's operation, either for personal gain or for any purpose other than that intended by the Group. 4. To ensure confidentiality of information, communication and transactions conducted by the Group. 5. To ensure transparency and justice. 	Complied

		<p>6. To create a respectful workplace environment and culture. Policies were communicated frequently through internal meeting with workers attached the records of training attendance list, photo evident and training materials as follow dates:</p> <ol style="list-style-type: none"> 1. Chamek Estate on 19/05/2022 and 27/02/2023. 2. Kulai Young Estate on 11/03/2023. 3. Telok Sengat Estate on 02/04/2023. 4. Telok Sengat POM on 10/04/2023. <p>Policy in place also implemented in all business operations and transactions, including recruitment and contracts. Based on the visit, information available displayed at board in operation unit area includes negotiation procedure, complaint flowchart and company policies are in both English and Bahasa.</p>	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>BPB maintain the current handbook of Code of Ethics & Conduct established as commitment to maintain the highest standards of integrity and professionalism in its business dealings. Telok Sengat POM, Chamek Estate, Kulai Young Estate and Telok Sengat Estate management has briefed and communicate the requirement compliance from handbook to workers and contractor during internal with workers and external stakeholders meeting. Worker's performance for compliance of policy implementation were monitored by immediate superior and assessed during annual appraisal program. While contractors will be monitor by BPB Marketing HQ Department. Monitoring also conducted through annual internal audit conducted by BPB HQ Sustainability Department.</p>	Complied
<p>Principle 2: Operate legally and respect rights</p>			

Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p>(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -</p>	<p>The operating units continued to comply with the legal and other requirements. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team.</p> <p>The operating units had obtained and renewed license and permits as required by the law. Among others the licenses/permit viewed were as follows:</p> <p><u>Chamek Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License no. 613906002000, valid till 31/07/2024. 2. Scheduled Control Goods Permit for Diesel ref. no. BPGK JH (KLU) 2321 JK, valid till 09/03/2025. 3. Air compressor certificate of fitness no. PMT-JH/23 209337 valid till 10/09/2024. 4. Weighbridge Calibration Certificate serial no. B749111167 dated 04/01/2023 valid for 1 year. 5. Salary deduction permit under Section 24, Labour Act 1955 serial no. PP3/29/254/2006 dated 06/07/2017 <p><u>Kulai Young Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License no. 620978002000, valid till 30/04/2024. 2. Air compressor certificate of fitness no. PMT-JH/23 201330 valid till 06/06/2024. 3. BAKAJ License for water abstraction and diversion no. 07/A/KJ/055, valid till 31/12/2023. 4. Weighbridge Calibration Certificate serial no. B839520082 dated 05/01/2023 valid for 1 year. 	Complied

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5. Scheduled Control Goods Permit for Diesel no. J004055, ref. no. KPDKK.J-JB/26/5A/11/1410 (P/D)(P1), valid till 12/07/2024.

Telok Sengat Estate

- MPOB License no. 615231002000, valid till 30/09/2023.
- Scheduled Control Goods Permit for Diesel no. J000255, valid till 09/04/2024.
- Air compressor certificate of fitness no. SB PMT 17734, valid till 25/08/2023.

Telok Sengat POM

1. MPOB License no. 500089304000, valid till 31/08/2023.
2. Scheduled Control Goods Permit for Diesel no. J005969, valid till 09/10/2023.
3. DOE license no 006380, valid till 30/06/2023.
4. BAKAJ License for water abstraction and diversion no. 08/A/KT/028, valid till 31/12/2023.
5. Machineries certificate of fitness:

1	Air Compressor JH PMT 11496	04/01/2024
2	Air Compressor JH PMT 11497	04/01/2024
3	Air Compressor JH PMT 11496	04/01/2024

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			<table border="1"> <tr> <td>4</td> <td>Sterilizer no JH PMT 17754</td> <td>04/01/2024</td> </tr> <tr> <td>5</td> <td>Sterilizer no PMT 135943</td> <td>04/01/2024</td> </tr> <tr> <td>6</td> <td>Sterilizer no PMT 135944</td> <td>22/02/2024</td> </tr> <tr> <td>7</td> <td>Air Receiver no JH PMT 5465</td> <td>04/01/2024</td> </tr> <tr> <td>8</td> <td>Steam Separator JH PMT 11494</td> <td>04/01/2024</td> </tr> <tr> <td>9</td> <td>Monorail Crane no PMA 44218</td> <td>04/01/2024</td> </tr> </table>	4	Sterilizer no JH PMT 17754	04/01/2024	5	Sterilizer no PMT 135943	04/01/2024	6	Sterilizer no PMT 135944	22/02/2024	7	Air Receiver no JH PMT 5465	04/01/2024	8	Steam Separator JH PMT 11494	04/01/2024	9	Monorail Crane no PMA 44218	04/01/2024	
4	Sterilizer no JH PMT 17754	04/01/2024																				
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8	Steam Separator JH PMT 11494	04/01/2024																				
9	Monorail Crane no PMA 44218	04/01/2024																				
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>All operating units have Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements.</p> <p>Reviewed the latest Legal & Other Requirements Register (LORR) dated 06/01/2023. Among the latest update in the register as follow:</p> <ol style="list-style-type: none"> 1. Occupational Safety and Health (Amendment) Act 2022 2. Employment Act (Amendment) Act 2022 3. Anti-Sexual Harassment Act 2022 <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 (Sustainability Section). Boustead Plantations Berhad have centralized system for tracking any changes in the law and subscribe into Lawnet.</p>	Complied																			
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>The estates have installed boundary markers as sighted during the visit at the estates. This confirmed that they have maintained boundary markers by installing the red/white pole and signage.</p>	Complied																			

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There were also points whereby boundary stones are marked and identified.

	Estate	Location	Boundary neighbours
1	Chamek	P2010A	Smallholders
2	Chamek	P2012A	Smallholders
3	Chamek	PJ2014A	Government Road
5	Teluk Sengat	P2011E	FELDA Air Tawar 1
6	Teluk Sengat	P2002E	Kg Johor Lama
7	Teluk Sengat	P2012A	FELDA Air Tawar 5
8	Teluk Sengat	P 2008A	Kg Telok Sengat
9	Kulai Young	PJ2016A	Hanson Quarry
10	Kulai Young	PJ2012A	Tanah Raya Quarry
11	Kulai Young	PJ 2010A	SDP Kulai Estate
12	Kulai Young	PM1995A	SDP Sri Pulai Estate

The mill was located within Telok Sengat Estate legal parameters. Fencing parameters established around the mill building complex to

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		separate the management boundary of estate and the mill. The housing and other recreational facilities are located within the same vicinity for ease of employees' management.	
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is maintained. - Minor compliance -	The operating units has listed all contracted parties in documented in the List of Stakeholders. Information stated in the list includes Name of Parties, Address and Contact number. The mill has established list of FFB supplier and documented in the List of FFB suppliers from Company Telok Sengat Palm Oil Mill.	Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -	Addressed in the contract between Boustead Estates Agency Sdn. Bhd/ Boustead Telok Sengat Sdn. Bhd. and contractors under clause 12. Governing Law and Disputes Resolution. Reviewed the sampled contracts agreement as follows: 1. Contract for CPO transport between Boustead Estates Agency Sdn. Bhd. and Yewtan Enterprise Sdn. Bhd. dated 12/09/2011 and addendum to the agreement dated 02/01/2021. 2. Contract for FFB supplier between Boustead Telok Sengat Sdn. Bhd. and Jaya Sewajar Sdn. Bhd. dated 01/04/2020 and addendum to the agreement dated 08/06/2023. 3. Contract for FFB supplier between Boustead Telok Sengat Sdn. Bhd. and UM Plantations Sdn. Bhd. dated 01/01/2020 and addendum to the agreement dated 08/06/2023. Major Non-conformance (Minor NC) The evidence of legal due diligence of all contracted third parties was not satisfactorily demonstrated. Refer to P.U.(A) 140, Minimum Wages Order 2022 dated 27/04/2022 of Section 5 (2) 'Berhubung dengan seorang pekerja	Non-compliance

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		<p>yang tidak dibayar gaji pokok tetapi dibayar gaji hanya berdasarkan upah ikut kerja, berat tan, tugas, perjalanan atau komisen, kadar gaji bulanan yang kena dibayar kepada pekerja itu berkuat kuasa mulai 01/01/2023 hendaklah tidak kurang daripada MYR1,500.00.</p> <p>Sampled the payslips of transporter driver [IC No.: 66xx] to Yewtan Enterprise, CPO transporter in Telok Sengat POM found made EPF contribution and deduction from employee's wages with incorrect amount from incorrect wage rate. Currently, the Minimum Wages Order 2022 rate is MYR1,500.00.</p> <p>Refer to Perlesenan Pemborong dan Peruncit 1996, Peraturan-peraturan Kawalan Padi dan Beras, Akta Kawalan Padi dan Beras 1994.</p> <p>Based on site visit, the groceries shop at Kulai Young Estate was found to have been storing rice packages and distributing them to the workers. However, there is no evidence that the shop has obtained legal permit from the relevant authority for this activity.</p> <p>Telok Sengat Estate management did not monitor employment contract and payslip for replanting contractor's workers.</p> <p>Since there were other issues found within the same indicator hence, the Minor NC has been escalated as Major NC as per Major NC # 2354215-202306-M3.</p>	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>Addressed in the Addendum to the Agreement between Boustead Estates Agency Sdn. Bhd, Boustead Telok Sengat Sdn. Bhd. and contractors under clause 6.7 stated as follows:</p> <p>"The FFB supplier strictly must ensure that all workers engage by him must possess the relevant legal documentation to work in the estate. children and young person shall not be employed or exploited. The minimum age shall comply with local, state and national legislation."</p>	Complied

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		<p>Reviewed the sampled contracts agreement as follows:</p> <ol style="list-style-type: none"> 1. Contract for CPO transport between Boustead Estates Agency Sdn. Bhd. and Yewtan Enterprise Sdn. Bhd. dated 12/09/2011 and addendum to the agreement dated 02/01/2021. 2. Contract for FFB supplier between Boustead Telok Sengat Sdn. Bhd. and Jaya Sewajar Sdn. Bhd. dated 01/04/2020 and addendum to the agreement dated 08/06/2023. 3. Contract for FFB supplier between Boustead Telok Sengat Sdn. Bhd. and UM Plantations Sdn. Bhd. dated 01/01/2020 and addendum to the agreement dated 08/06/2023. 											
<p>Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>													
<p>2.3.1</p>	<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>The mill has established list of FFB supplier and documented in the List of FFB suppliers from Company Telok Sengat Palm Oil Mill dated 14/06/2023.</p> <p>In the list stated the FFB Supplier name, Supplier categories, concession address (village), Coordinated points, concession map, Area of concession (ha), concession legality status and FFB supply percentage.</p> <p>Reviewed the sampled FFB supplier as follow:</p> <table border="1" data-bbox="1137 1091 1928 1302"> <thead> <tr> <th rowspan="2">Supplier</th> <th colspan="2">Geo-location</th> <th rowspan="2">MPOB License</th> </tr> <tr> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>Jaya Sewajar Sdn. Bhd.</td> <td>1.57706</td> <td>104.02432</td> <td>805123001007 valid till 31/12/2024</td> </tr> </tbody> </table>	Supplier	Geo-location		MPOB License	Latitude	Longitude	Jaya Sewajar Sdn. Bhd.	1.57706	104.02432	805123001007 valid till 31/12/2024	<p>Complied</p>
Supplier	Geo-location			MPOB License									
	Latitude	Longitude											
Jaya Sewajar Sdn. Bhd.	1.57706	104.02432	805123001007 valid till 31/12/2024										

		Rudijaya Sdn. Bhd	1.52667	104.03611	521480002000 valid till 30/06/2023		
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1. - Minor compliance -	Verified during document review, Telok Sengat POM only received FFB from directly sourced, i.e., estates. The FFB supplier was documented in List of FFB suppliers from Company Telok Sengat POM dated 14/06/2023.				Complied	
Principle 3: Optimise productivity, efficiency, positive impacts and resilience							
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.							
3.1.1	(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -	The business management plan also known as Projected Cash flow Statement contained the details as following: - FFB Crop Production and yield per area (Ha) - Crop protection from 2023 until year 2028 - Cost per MT FFB with estimated in 2023 RM/FFB - Price forecast - Financial indicators No Scheme Smallholders within Telok Sengat Business Unit certification.				Complied	
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	Except for Kulai Young Estate, both Telok Sengat Estate and Chamek Estate has established replanting programs for the period from 2023 to 2027. The program was reviewed once a year and incorporated into their annual financial budget. The program sighted for the next 5 years in hectares was as following:				Complied	
		Estate	2023	2024	2025	2026	2027
		Telok Sengat	213.9	210.0	102.4	143.6	168.4

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		Chamek	98.30	27.30	30.70	39.50	40.50	
		Boustead Plantations Berhad no longer has ownership of Kulai Young Estate and currently been appointed as management agency by the new owner (refer ASA 2022 report).						
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -	<p>Latest Management Review Meeting was conducted on 11/05/2023 at Telok Sengat Estate Meeting Room with attendance as following:</p> <ul style="list-style-type: none"> - Azmariah Muhamed (Head of Sustainability & Safety) - Shamsulbahri Mohamad (Chairman/ Head Telok Sengat POM) - Syarmizar Safki (Mill Manager) - Ramli Salim (Manager-Telok Sengat Estate) - Saadun Ahmad (Manager-Chamek Estate) - Radzali Mohamed (Manager-Kulai Young Estate) - Hafizi Boniran (Manager-Sustainability & Safety Department) - Other Assistant Managers and Cadet representing estates. <p>Among agendas discussed in the review meeting was Internal Audit results that was conducted between 08-12/05/2023 where total NCRs raised 20 and 17 OFIs. Other review included performance, recommendation for improvement, complaint and grievances, resources need and other business. Minutes prepared by Syarmizar Safki (Telok Sengat POM Manager) and approved by Shamsulbahri Mohamad (Head of Telok Sengat Business Unit).</p>						Complied
Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.								
3.2.1	(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. - Critical (Major) compliance -	The continuous improvement plan was available for Telok Sengat Business Unit for Year 2023, this plan considered main social and environmental impacts and opportunities such as per sample below: -						Complied

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		<ul style="list-style-type: none"> - To maintained and monitor the facilities and amenities of worker infrastructure conditions includes housing, clean water, and sanitation. - To maintain employees’ children education facilities availability (Creche). - To maintain healthcare and general facilities availability and conditions. - To ensure employee wage system, work contract, Passport and Work Permit. - To substitute chemical to cultural and biological practices by implementing IPM - To ensure the soil erosion reduced 	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE: The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed. Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>The Certification Unit has completely its RSPO metrics template version 2.1 and submitted to the CB prior to this assessment. The input data was found to be accurate based on the following records verification of information as following:</p> <ul style="list-style-type: none"> • computer database & accounting/production system • Land titles • Complaints & grievance records • Dept. of Safety & Health’s JKPP8 form 	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>SOP are in place for both mill and estates within Telok Sengat Business Unit. For Telok Sengat POM, the SOP include Quality Assurance Manual (QAM, Issue: 01, Date:12/2017), Mill Operation Manual (MOM, Issue 01 Rev 01, Date: October 2017) and Standard Operating Procedure for SPOM was established to cover all the</p>	Complied

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station. Sighted some of the procedure related to loading ramp, sterilization station, threshing and press station, clarification station, kernel station, depericarper station, kernel station, effluent treatment plant, boiler house, powerhouse, water treatment plant etc.

For estates, the SOP consist of a total 43 Standard Work Procedures (SWP) latest updated on 11/10/2019. Among SWP reviewed are as following:

	SWP	Activities		SWP	Activities
1	SWP 1	Spraying	4	SWP 25	Loading FFB
2	SWP 5	Manuring	5	SWP 27	L/F Collection
3	SWP 20	Pruning	6	SWP 33	Planting of seedling

Additionally, there are Oil Palm Circular (OPC) for the estate operation as following:

		Activities			Activities
1	OPC A	Programming	9	OPC012	Fences & Survey
2	OPC01	Weeding	10	OPC013	Pollination
3	OPC02	Lalang	11	OPC014	Pruning
4	OPC03	Manuring	12	OPC015	Collection
5	OPC04	Pest & Disease	13	OPC016	Labor Assistance
6	OPC05	Census	14	OPC051	Felling & clearing
7	OPC07	Road & bridges	15	OPC052	Planting material
8	OPC08	Soil & Water Cons.	-	-	-

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<p>3.3.2</p>	<p>A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -</p>	<p>Mechanism to check consistent implementation of procedures are in place including internal audit by HQ department on annual basis to check and report compliance against company policy and procedure with regards to operation, safety, health and welfare requirements. Latest internal audit was conducted on 8-12/5/2023. Other Mechanism to ensure consistency implementation of the procedures is made through various activities such as following:</p> <ul style="list-style-type: none"> - ESH workplace inspection on quarterly basis. - Agronomist/PMU visits for monitoring of appearance of palm, ground cover and soil management, nursery, replanting program, pest & disease, leaf & soil analysis and yield analysis for fertilizer recommendations - The executives/staff level performed daily duties through the morning muster as part of the monitoring work. Field visits during the audit was made randomly on the day activities to verify PPE and GAP practices. 	<p>Complied</p>
<p>3.3.3</p>	<p>Records of monitoring and any actions taken are maintained and available. - Minor Compliance -</p>	<p>Monitoring and action records available being kept for a minimum period of 12 months. Sample records sighted as following:</p> <ul style="list-style-type: none"> - Agronomic advisory report and fertilizer recommendation minimum 1x/year to monitor matters relating to nutrient deficiency, fertilizer program, pest & disease ganoderma infection, rat and RB attack and EFB mulching program. - Plantation Monitoring Unit visit producing "<i>Estate Visit Report</i>" at frequency of 2x/year performing assessment relating to land use, capital expenditure, general charges, oil palm (mature & immature area) field condition, crop performance and cost, vehicles & equipment, amenities, labour and security, replanting activities and replanting activities by contractors are 	<p>Complied</p>

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		monitored to ensure compliance against the BPB and industry standards.	
Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	<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 is no new planting in all estates within Boustead Telok Sengat Business Unit. Review on the Social & Environmental Impact Assessment (SEIA) report, BPB maintained the current report cover operating units include Telok Sengat POM, Telok Sengat Estate, Kulai Young Estate, Chamek Estate, Eldred Estate and Bekoh Estate. The assessment conducted on 02/04/2018 until 10/04/2018.</p> <p>The assessment was conducted in the palm oil mill and all five estates, involving internal stakeholders, local communities, government agencies, NGOs and other relevant parties whose participation and contribution was vital to the assessment. Issues raised by the stakeholders were incorporated into a management plan. Social profile such as social background of employees, background of local community, education, safety, and health, living condition, infrastructure and amenities and stakeholder engagement were assessed accordingly. Environmental receptors including land, water, air and communities were also being assessed its impact from the existing operations of mill and estates. The findings of the assessments together with the recommendations for social and environmental impact management and mitigation are presented in the report.</p>	Complied
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>Review on the Social & Environmental Impact Assessment (SEIA) report, BPB maintained the current report cover operating units include Telok Sengat POM, Telok Sengat Estate, Kulai Young Estate, Chamek Estate, Eldred Estate and Bekoh Estate. The assessment conducted on 02/04/2018 until 10/04/2018, SEIA is</p>	Complied

		<p>available, been reviewed on yearly basis and whenever new or changes in operation.</p> <p>The assessment was conducted in the palm oil mill and all five estates, involving internal stakeholders, local communities, government agencies, NGOs and other relevant parties whose participation and contribution was vital to the assessment. Issues raised by the stakeholders were incorporated into a management plan. Social profile such as social background of employees, background of local community, education, safety, and health, living condition, infrastructure and amenities and stakeholder engagement were assessed accordingly. Environmental receptors including land, water, air and communities were also being assessed its impact from the existing operations of mill and estates. The findings of the assessments together with the recommendations for social and environmental impact management and mitigation are presented in the report.</p> <p>Social action plan for year 2023 established by mill and estates includes category of the issues, impacts, affected stakeholder, action plan, time frame implementation, person in charge to handle the issues, remarks of the status and documents' location.</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -</p>	<p>Telok Sengat POM, Chamek Estate, Kulai Young Estate and Telok Sengat Estate management review annually their SEIA Action and monitoring plan. The documents been implemented, reviewed, and updated regularly in a participatory way through meetings conducted such as gender committee, union meeting, internal workers meeting and external stakeholders meeting.</p> <p>Among aspects and impacts identified to be taken action were as following:</p> <ol style="list-style-type: none"> 1. Amenities, Employees living & worker infrastructure (housing, clean water, sanitation) conditions. 	Complied

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		<ol style="list-style-type: none"> 2. Employees’ children education facilities availability (Creche) 3. Healthcare and general facilities availability and conditions 4. Employee Wage System, Work Contract, Passport and Work Permit 5. Scheduled waste generation and management, control and monitoring 6. General was generation and management, control and monitoring 7. Buffer zone management, control and monitoring 8. Water consumption and discharged water management, control and monitoring 9. Mill boiler emission management, control and monitoring <p>Policies were communicated frequently through internal meeting with workers attached the records of training attendance list, photo evident and training materials as follow dates.</p> <ol style="list-style-type: none"> 1. Chamek Estate on 19/05/2022 and 27/02/2023. 2. Kulai Young on 11/03/2023. 3. Telok Sengat Estate on 02/04/2023. 4. Telok Sengat POM on 10/04/2023. 	
<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. - Minor Compliance -</p>	<p>BPB established the Procedure of New Local Staff/Workers Hiring; Rev. # 1; Effective date: Feb 2020 and Foreign Workers Procedure; Rev. # 1; Issue date: Jan 2016 which documented the procedure for recruitment, selection, hiring, promotion, retirement and termination of both local and foreign workers. The procedures were made available to the workers upon request. BPB too has revised the standard operating procedure on Recruitment &</p>	<p>Complied</p>

		<p>Employment of Migrant Workers (S) with Doc. No.: WMU/01/REM-00 effective and updated on 01/09/2022.</p> <p>The procedure describe is to provide a set of guidelines for responsible and fair recruitment of all migrant workers (s) within BPB’s supply chain, in tandem with BPB’s commitment to respect human rights.</p> <p>BPB maintain the current ‘Proses Pengambilan Pekerja Tempatan’ which documented the procedure for recruitment, selection, hiring, promotion, retirement, and termination of both local and foreign workers. The procedures were made available to the workers upon request.</p>	
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Employment procedures are well implemented with records well maintained as per information reported in indicator 6.1.1 to 6.6.2 below.</p> <p>Document review on application form, employment interview assessment form, medical check-up report, offer letter and employment contract at Telok Sengat POM, Chamek Estate, Kulai Young Estate and Telok Sengat Estate are available to review both local and foreign workers.</p> <p>A copied of identification card, passport and work permit were kept as record.</p> <p>Example <u>Kulai Young Estate:</u> Briefing on terms & conditions from employment agreement to new jointly foreign and local workers conduct in May and June 2023 are available to review.</p> <p>The latest recruitment of workers in Telok Sengat POM, Chamek Estate, Kulai Young Estate and Telok Sengat Estate were as of June 2023.</p>	Complied

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		<p>Onsite interviewed with the Telok Sengat POM, Chamek Estate, Kulai Young Estate and Telok Sengat Estate management informed that if there is any job vacancy available, they disseminate job vacancy to head of villages, job advertisement flyer at main gate of estates/mill and disseminate info through WhatsApp's.</p>	
<p>Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			
<p>3.6.1</p>	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -</p>	<p>The operating units has conducted assessment for risk covers all main operations and support operations. The risk assessment was reviewed at minimum once a year, or as when necessary due to accident occur or changes on the operation.</p> <p>Boustead Plantation has established Standard Operating Procedure for risk assessment as per HIRARC Procedure. Refer SOP no. SSD/03/HRP-02, rev. 02 dated 25/01/2023. As per SOP, under section 8.0 Review of Assessment stated the HIRARC should be reviewed and updated under following circumstances:</p> <ol style="list-style-type: none"> 1. Immediately, whenever where there is occurrence of major or fatality accident (issuance of JKPP 6/ JKPP 7) at the workplace 2. When there is a change in the work method which has new hazard and risk 3. When a new machine and/or technology is introduced 4. When there is a new activity, process or operation <p>Reviewed the sample risk assessment as follows: Chamek Estate</p> <ol style="list-style-type: none"> 1. The estate conducted Noise Risk Assessment on 14/02/2022 by assessor with DOSH reg. no. HQ/08/PEB/00/87. Refer doc. no. N087/2202-015. 	<p>Non-compliance</p>

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		<ol style="list-style-type: none"> 2. Chemical Heath Risk Assessment has been conducted on 03/11/2020 by assessor with DOSH reg. no. HQ/14/ASS/00/350. Refer report no. HQ/14/ASS/00/350 – 2020/070. 3. The estate has conducted the risk assessment on estate operations documented in HIRARC register. The register was reviewed if there is accident occur or any changes in the operation. Latest review was conducted on 20/04/2023 due to accident occur on 16/04/2023 in workers riding motorbike to work outside working hours. <p>Kulai Young Estate</p> <ol style="list-style-type: none"> 1. The estate conducted Noise Risk Assessment on 14/02/2022 by assessor with DOSH reg. no. HQ/08/PEB/00/87. Refer doc. no. N087/2202-016. 2. Latest HIRARC review was conducted on 24/03/2022 with changes on triple rinse activity and Axillary Police and Security Activity. 3. The estate has conducted Chemical Risk Assessment on 10/10/2018 by assessor with reg. no. HQ/04/ASS/00/193. Refer report no. HQ/04/ASS/00/193 – 2018/037. <p>Telok Sengat Estate</p> <ol style="list-style-type: none"> 1. The estate conducted Noise Risk Assessment on 17/02/2022 by assessor with DOSH reg. no. HQ/08/PEB/87. Refer report ref. no. N087/2202-017. 2. Latest CHRA was conducted on 18/04/2022 – 25/05/2022 by assessor with DOSH reg. no. HQ/21/ASS/00/00048. Refer report no HQ/21/ASS/00/00048 – 2022/023. 	
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		<p>3. Latest HIRARC review was conducted on 29/05/2023 on harvesting operation due to accident occur on 27/05/2023. Reviewed the HIRARC register and accident investigation reports.</p> <p>Telok Sengat POM</p> <ol style="list-style-type: none"> 1. Latest HIRARC review was conducted on 02/01/2023 due to accident occur in sterilizer station on 30/12/2022 2. Latest CHRA has been conducted on 17/05/2023 by assessor with DOSH reg. no. HQ/04/ASS/00/203. The report has yet to be received by the mill during the 3. Latest NRA has been conducted on 07/10/2021 by assessor with DOSH reg. no. HQ/14/PEB/00/38. <p>Boustead Plantation has revised established Standard Operating Procedure for risk assessment as per HIRARC Procedure. Refer SOP no. SSD/03/HRP-02, rev. 02 dated 25/01/2023.</p> <p>As verified during document review at Chamek Estate and Kulai Young Estate and Telok Sengat Estate it was noted that the format used for HIRARC register was not consistent with new format as Appendix 2-Hirarc Register Form.</p> <p>The Risk Score also still using the superseded level of score (21-25 Distastrous-Very High Risk, 16-20 Critical-High Risk, 11-15 Serious-Moderate Risk, 6-10 Significant-Low Risk, 10-5 Noticeable-Veri Low Risk), while new procedure level of score (15-25 High, 5-12 Medium, 1-4 Low)</p> <p>Thus, non-conformity was raised.</p>	
3.6.2	(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	The operating units has established and monitored Occupational Safety and Health Plan 2022 and 2023. Reviewed the	Complied

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	<p>- Critical (Major) compliance -</p>	<p>implementation of the management plan FY 2022 and 2023 as follows:</p> <p>Chamek Estate</p> <ol style="list-style-type: none"> 1. The estate reported the accident cases occur in the estate n monthly basis to the head office. Reviewed the Summary of Accident FY 2022 and todate May 2023. 2. The estate conducted the workplace inspection on monthly basis. Reviewed the inspection records dated 22/01/2023 at office area, 24/02/2023 at FFB ramp, 13/02/2023 at spraying gang, 15/03/2023 at chemical store and premixing area and 17/04/2023 at workshop area. 3. The estate conducted audiometric test on annually basis for grasscutter as recommended in the NRA report. The latest test was conducted on 29/03/2023 by OHD with DOSH reg. no. HQ/20/DOC/00/0064. <p>Kulai Young Estate</p> <ol style="list-style-type: none"> 1. To ensure the vehicle were always in safe condition, the estate conducted vehicle inspection on daily basis recorded in the Service Maintenance Form. Reviewed the inspection reports for vehicle no. BNH 6230 for the month of March and May 2023 2. The estate reported the accident cases occur in the estate n monthly basis to the head office. Reviewed the Summary of Accident FY 2022 and todate May 2023 3. The estate conducted medical surveillance on annually basis as recommended in the CHRA report. Latest medical surveillance was conducted on 27/09/2022 by OHD with reg. no. HQ/17/DOC/00/00005 	
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		<p>Telok Sengat Estate</p> <ol style="list-style-type: none"> 1. The estate conducted workplace inspection on monthly basis and discussed safety and health committee meeting. Reviewed the inspection records dated 30/05/2023, 22/05/2023, 17/05/2023, 18/03/2023, 11/03/2023 and 25/02/2023. 2. The estate reported the accident cases occur in the estate n monthly basis to the head office. Reviewed the Summary of Accident FY 2022 and todate May 2023. 3. The estate continuously conducted training to the first aider. Reviewed the training records entitled First Aid Contents and Usage dated 04/08/2022 <p>Telok Sengat POM</p> <ol style="list-style-type: none"> 1. The mill conducted workplace inspection on quarterly basis. reviewed the inspection records conducted in March 2023, Nov 2022 and May 2022 2. The estate continuously conducted training to the first aider. Reviewed the training records entitled First Aid Contents and Usage dated 04/08/2022 <p>The mill conducted medical surveillance for chemical handlers, Authorised Gas Tester Entry/ Supervisor (AGTES) and Authorised Entrant and Standby Person for Confined Space (AESP) on 08/06/2023.</p>	
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
<p>3.7.1</p>	<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</p>	<p>The estates visited has conducted training need analysis for all employee, management and contractors. The need analysis was conducted based on the job designation and training required by the job type.</p>	<p>Complied</p>

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	<p>aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The estates have established training schedule FY 2023 based on training need analysis conducted. The training program covers Policy, operation and OSH/others.</p> <p>The program involves the executive, staff/ supervisor, workers and contractors. The identified training was programmed throughout the year.</p>	
<p>3.7.2</p>	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>The operating units maintained the training records conducted. Reviewed the training records as follows:</p> <p><u>Chamek Estate</u></p> <ol style="list-style-type: none"> 1. Scheduled waste briefing dated 06/06/2023 2. E-adu (grievances channel) briefing dated 07/06/2023 3. Safety work procedure for harvesting training dated 10/04/2013 and 12/05/2023 4. First aider training dated 07/06/2023 5. Safety work procedure for spraying and maintenance of spraying pump training dated 12/05/2023 and 21/03/2023 6. Safety work procedure for manuring training dated 12/04/2023 7. Firefighting and ERP training dated 17/01/2023 8. Buffer zone briefing dated 09/01/2023 <p><u>Kulai Young Estate</u></p> <ol style="list-style-type: none"> 1. Safety work procedure and tractor maintenance training dated 18/03/2023, 27/02/2022 2. Safety work procedure for harvesting training dated 09/03/2023, 04/08/2022, 07/06/2022 	<p>Complied</p>

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		<ol style="list-style-type: none"> 3. Fire drill and firefighting demonstration and training with Kulai Fire Department dated 03/12/2022 4. First aid kit basic training dated 29/10/2022 5. Chemical handling for Adonis for bagworm control training dated 24/06/2022 6. Management of bagworm and nettle caterpillar dated 08/08/2022 7. Safety work procedure and PPE awareness for ramp attendance training dated 19/05/2022 <p><u>Telok Sengat Estate</u></p> <ol style="list-style-type: none"> 1. First Aid contents and usage training dated 04/08/2022 2. Domestic waste management training dated 04/08/2022 3. Scheduled waste management training dated 04/08/2022 4. Handling of hazardous chemical training dated 27/07/2022 5. Sexual harassment management at workplace dated 12/04/2022 6. Safety at workplace and PPE awareness training dated 09/01/2023 <p><u>Telok Sengat POM</u></p> <ol style="list-style-type: none"> 1. Safety Work Procedure for rat baiting training dated 03/06/2023 2. Safety Work Procedure for spraying and manuring training dated 13/05/2023 3. Replanting felling and chipping training dated 19/04/2023 4. Tractor driver training dated 27/03/2023 and 09/01/2023 	
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		<ul style="list-style-type: none"> 5. Workshop operator training dated 14/03/2023 6. HCV and area prohibited for chemical application training dated 09/03/2023 7. Safety work procedure for store training dated 22/02/2023 8. Safety work procedure for census training dated 18/02/2023 9. Safety work procedure for harvesting training dated 15/02/2023 and 10/01/2023 10. Employment act 1955 amendment training dated 16/01/2023 									
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>The mill has identified the personnel to implement the SCCS in the mill such as Auxiliary Police, Weighbridge Clerk, Lab Personnel, Chief Clerk etc.</p> <p>The person in charge was appointed via letter issued by the Mill Manager. The letter was sighted and verified.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th>PIC</th> <th>Designation</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Muthukumaran J</td> <td>Chief Clerk</td> <td>29/11/21</td> </tr> </tbody> </table> <p>The mill continuously provided training to the key personnel to ensure the understanding on the implementation of SCCS in the mill. Reviewed the latest training for SCCS training dated 08/08/2022.</p>		PIC	Designation	Date	1	Muthukumaran J	Chief Clerk	29/11/21	Complied
	PIC	Designation	Date								
1	Muthukumaran J	Chief Clerk	29/11/21								
<p>Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C). However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>											
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the</p>	<p>Boustead Plantations Berhad has established Supply Chain and Traceability Procedure, rev. 1 dated 09/09/2022. Refer SOP no. SSD/01/SCT-01.</p> <p>Under section 4.4 Supply Chain Models, stated as follows:</p>	Not Applicable								

	<p>RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>4.4.1 Identity Preserve or Segregation – Mill shall ensure that there are no mixing of certified and non-certified material in processing and storage of sustainable products (through cleaning, flushing or other appropriate methods). This to ensure 100% segregate sustainable product to be reached.</p> <p>The mill adopted the Mass Balance module. Thus, the criterion is not applicable.</p>	
<p>3.8.2</p>	<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>Boustead Plantations Berhad has established Supply Chain and Traceability Procedure, rev. 1 dated 09/09/2022. Refer SOP no. SSD/01/SCT-01.</p> <p>Under section 4.4 Supply Chain Models, stated as follows:</p> <p>4.4.2 Mass Balance – Mill can process FFB from both certified and non-certified estates together in production line. No separation required provided records of FFB volume processed, CPO produced and dispatched are maintained. Certified oil palm products delivered to the end user under the mass balance supply chain model will be traceable to a list of certified mills</p> <p>The mill adopted the Mass Balance module as it received the FFB from certified and uncertified source.</p>	<p>Complied</p>
<p>3.8.3</p>	<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 in Table 7.</p>	<p>Complied</p>

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<p>3.8.4</p>	<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 licenses available at PalmTrace as following:</p> <table border="1" data-bbox="1153 411 1935 837"> <tr> <td>License ID</td> <td>CB139559 (Active)</td> </tr> <tr> <td>Member Name</td> <td>Boustead Plantations Berhad - Telok Sengat Business Unit – Telok Sengat Palm Oil Mill</td> </tr> <tr> <td>Member ID</td> <td>RSPO_PO1000003738</td> </tr> <tr> <td>RSPO Membership Number</td> <td>1-0012-04-000-00 (Boustead Plantations Berhad)</td> </tr> <tr> <td>Type of Business</td> <td>Oil mill</td> </tr> <tr> <td>Issued On</td> <td>25-10-2022</td> </tr> <tr> <td>Issued By</td> <td>BSI Services Malaysia Sdn Bhd.</td> </tr> </table> <p>Based on verification of transaction records extracted from RSPO Palmtrace, the registration and reporting requirements found to be met.</p>	License ID	CB139559 (Active)	Member Name	Boustead Plantations Berhad - Telok Sengat Business Unit – Telok Sengat Palm Oil Mill	Member ID	RSPO_PO1000003738	RSPO Membership Number	1-0012-04-000-00 (Boustead Plantations Berhad)	Type of Business	Oil mill	Issued On	25-10-2022	Issued By	BSI Services Malaysia Sdn Bhd.	<p>Complied</p>
License ID	CB139559 (Active)																
Member Name	Boustead Plantations Berhad - Telok Sengat Business Unit – Telok Sengat Palm Oil Mill																
Member ID	RSPO_PO1000003738																
RSPO Membership Number	1-0012-04-000-00 (Boustead Plantations Berhad)																
Type of Business	Oil mill																
Issued On	25-10-2022																
Issued By	BSI Services Malaysia Sdn Bhd.																
<p>3.8.5</p>	<p>Documented procedures 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 	<p>Boustead Plantations Berhad has established Supply Chain and Traceability Procedure, rev. 1 dated 09/09/2022. Refer SOP no. SSD/01/SCT-01.</p> <p>The procedures cover as follows:</p> <ul style="list-style-type: none"> 4.0 Procedures/ Instruction Manual <ul style="list-style-type: none"> 4.1 Procedure for Supply Chain Management System <ul style="list-style-type: none"> 4.1.1 Sustainability Policy 4.1.2 Management Representative 4.1.3 Roles and responsibility 4.1.4 Record Keeping 4.1.5 Internal Audit 	<p>Complied</p>														

	<p>to demonstrate awareness of the mill’s procedures for the implementation of this standard.</p> <p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<ul style="list-style-type: none"> 4.1.6 Management Review 4.2 Resource Management <ul style="list-style-type: none"> 4.2.1 Competency and training 4.3 Traceability Procedure <ul style="list-style-type: none"> 4.3.1 Delivery of Fresh Fruit Bunch 4.3.2 Delivery of CPO and PK 4.4 Supply Chain Models <ul style="list-style-type: none"> 4.4.1 Identity Preserve or Segregation 4.4.2 Mass Balance 4.5 Reclassification of Mill’s Supply Chain 4.6 Material Accounting System (Fixed Inventory Period) 4.7 Outsourced Activities 4.8 Claims 4.9 Complaints and Grievances 4.10 Registration of transactions <p>The mill has appointed the Chief Clerk as person responsible to implement and monitor the Supply Chain Certification System in the mill as per appointment letter dated 29/11/2021 signed by the mill manager.</p> <p>As per SOP established under section 4.1.4 Record Keeping stated that retention times for all records and reports shall be a minimum of three (3) years and shall comply with legal and other regulatory requirement. Reviewed the implementation as follows:</p> <ol style="list-style-type: none"> 1. Reviewed the internal audit reports dated 26/07/2022 and 22/06/2021 2. SCCS training dated 08/08/2022 and 27/01/2020 	
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<p>3.8.6</p>	<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>As per SOP established under section 4.1.5 Internal Audit stated the internal audit shall be conducted at planned intervals to determine the RSPO requirement are effectively implemented and maintained.</p> <p>Latest internal audit was conducted on 29/05/2023 by executive from Sustainability Department. No non-conformity issued regarding SCCS raised during the audit.</p>	<p>Complied</p>
<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>As per SOP established under section 4.3.1 Delivery of Fresh Fruit Bunch and in Appendix B (i) Traceability Flowchart at Estate.</p> <p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all FFB received. Records were available at the office for verification.</p> <p>The mill has a system to verify at the weighbridge. Information for RSPO certified FFB were recorded in FFB Consignment notes and weighbridge tickets. Reviewed the sampled delivery off FFB as follows:</p> <p>Sample of own certified unit FFB received ticket:</p> <p>Estates: Chamek Estate Field: 00A, 16A, 98A, 99A Weighbridge ticket no.: 156273</p>	<p>Complied</p>

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		<p>DO No.: 5221 Vehicle no. MBD8041 Weight: 35970 kg</p> <p>Estates: Telok Sengat Estate Field: PM2019B Weighbridge ticket no.: 156414 DO No.: TS2019148 Vehicle no. WRD3203 Weight: 6190 kg</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> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; 	<p>As per SOP established under section 4.3.2 Delivery of CPO and PK and in Appendix B (ii) Traceability Flowchart at Mill.</p> <p>Reviewed the sample of CPO and PK dispatch as follows:</p> <p>CPO/Mass Balance Buyer: Mewah Oleo Industries Sdn. Bhd. Seller: Telok Sengat Palm Oil Mill Date: 26/05/2023 DO no. CPO 123202300318 Contract no. POTS01189 Weighbridge ticket no. 156423 Weight: 34,890 kg RSPO Cert. no.: RSPO 697033</p> <p>PK/Mass Balance</p>	<p>Complied</p>

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	<ul style="list-style-type: none"> h) Any related transport documentation; i) A unique identification number. 	<p>Buyer: Jin Lee (Oil Mills) Sdn. Bhd. Seller: Telok Sengat Palm Oil Mill Date: 23/05/2023 DO no. PK 1232023000307 Contract no. PKTS00429 Weighbridge ticket no. 156292 Weight: 41,850 kg RSPO Cert. no.: RSPO 697033</p>	
<p>3.8.9</p>	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> 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 ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes 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. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. 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 	<p>As per SOP established under section 4.7 Outsourced Activities. In the SOP stated that the organisation is on the site to ensure that CB have access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>Reviewed the contract for CPO transport between Boustead Estates Agency Sdn. Bhd and Yewtan Enterprise Sdn. Bhd dated 12/09/2011 and addendum to the agreement dated 02/01/2021 valid until 31/10/2023.</p> <p>The mill has legal ownership of material in transport as stated in section 8 Contractor’s Liability and section 9 Contractor’s Responsibility.</p> <p>As per addendum dated 02/01/2021 stated the contractors shall upon request by the company, allow Certification Bodies (CBS) Access to audit the contractors premise or operation if deemed necessary.</p>	<p>Complied</p>

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	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.	No FFB and/or oil palm products processing outsource by Telok Sengat POM except for CPO delivery transportation only. The list of outsourced contractors was registered in List of Stakeholder records that included the CPO transporter.	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.	As per SOP established under section 4.7 Outsourced Activities. In the SOP stated that the organisation is on the site to ensure that CB have access to the outsourcing contractor or operation if an audit is deemed necessary. No new contractor use by the mill so far.	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> 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. 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. 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. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. 	<p>As per SOP established under section 4.6 Material Accounting System (Fixed Inventory Periods).</p> <ul style="list-style-type: none"> iv) Reviewed the records of certified CPO and PK for the period of August 2022 – May 2023. All the RSPO certified materials received, and produce were found to be accurate, complete, up to-date and accessible based on sample daily production records and mass balance spreadsheet etc. v) As per SOP established under section 4.1.4 Record Keeping stated that retention times for all records and reports shall be a minimum of three (3) years and shall comply with legal and other regulatory requirement. vi) All receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK are recorded on a real-time basis in the mill’s Daily Production Report for period of August 2022 to May 2023. <p>As MB Module certified unit, Telok Sengat POM record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis based on daily production and</p>	Complied

	<p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.</p>	<p>delivery report. No conversion ratios as actual production extraction volumes are measured on daily basis. No short sell as the mill delivered from positive stocks available</p>	
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The extraction rate for mill is calculated in daily production detail report. Conversion factor of CPO and PK production is depending on the actual OER and KER.</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The mill is using the actual extraction rate and therefore updating of rates is not necessary.</p>	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>The mill certified as MB Module hence this requirement is not applicable.</p>	Not Applicable
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>The registration of PalmTrace is carried out by the Marketing Department, HQ. All transaction will be registered in the PalmTrace.</p> <p>Based on the announcement summary, all the registrations were found to be in order.</p> <p>No RSPO volume sold for other scheme. RSPO certified volume only downgraded to conventional CPO/PK.</p>	Complied

	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.		
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>	RSPO trademark was not in use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No RSPO trademark or logo been use in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records.	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>	No RSPO trademark or logo been use in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records.	Complied
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.	No RSPO trademark or logo been use in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records.	Complied

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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.	No RSPO trademark or logo been use in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records.	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.	No RSPO trademark or logo been use in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records.	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.	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.	Verification of shipping documents such as weighbridge tickets and delivery orders showed that the requirements of RSPO SCCS were adhered which included the information about certificate number stated.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.	Telok Sengat POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable

	b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.		
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	Based on the excel sheet mass balance accounting of the mill, production of certified products was calculated correctly according to fractions of FFB received from both certified and non-certified suppliers. Therefore, 95% of certified oil palm content in the products can be achieved.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	Based on the excel sheet mass balance accounting of the mill, production of certified products was calculated correctly according to fractions of FFB received from both certified and non-certified suppliers.	Complied
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. 	Telok Sengat POM is producing crude palm products and does not involve in any labelling of end product.	Complied

	<ul style="list-style-type: none"> Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	<p>Telok Sengat POM is producing crude palm products and does not involve in any labelling of end product.</p>	<p>Complied</p>
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</p>	<p>BPB maintain the current Human Rights Policy signed by Chief Executive Officer dated 02/12/2019. The company is committed to</p>	<p>Complied</p>

	<p>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>ensure every individual are treated with fairness, dignity, and respect. The company will respect the rights of every individual. They also recognize their responsibilities to respect human rights and avoid complicity in human rights abuses.</p> <p>Policies were communicated frequently through internal meeting with workers attached the records of training attendance list, photo evident and training materials as follow dates.</p> <ol style="list-style-type: none"> 1. Chamek Estate on 19/05/2022 and 27/02/2023. 2. Kulai Young on 11/03/2023. 3. Telok Sengat Estate on 02/04/2023. 4. Telok Sengat POM on 10/04/2023. <p>Policies also communicated to external stakeholder during latest external stakeholder consultation meeting.</p>	
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>Telok Sengat POM, Chamek Estate, Kulai Young Estate and Telok Sengat Estate management do not instigate violence and prohibits any form of harassment in their operation as per the policies above.</p> <p>Onsite interviewed with sampled workers informed they have no experience on any form of harassment by the management.</p>	Complied
<p>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</p>			
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>Based on the records of complaints and grievances no issue of whistle-blowing that requires anonymity of complainants and/or grievance parties.</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>BPB maintain the current Grievance Procedures Doc. No.: HR/2022/023/003, Rev.0, Issues: 01/03/2022.</p>	Complied

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	<p>- Minor compliance -</p>	<p>The procedure describes the management of a grievance raised by any employee or and the external parties that provide services to BPB and its group of companies. It is the intention of the Company that grievances between an employee or external parties and the company be settled as equitably and as quickly as possible. In pursuance of this, it is agreed that the grievances should be processed according to the following procedure with the aim of reaching agreement and maintaining continuous good relations between both parties.</p> <p>Each individual estates and mill maintain the current communication procedure includes with Complaint & Grievance Flowchart. The system involved the use of forms for Continuous Improvement/Grievance/Complaint made available directly for both internal and external stakeholders in respective operating units' sites.</p> <p>Latest complaints at Chamek Estate, Kulai Young Estate, Telok Sengat POM and Telok Sengat Estate are related to housing maintenance. Reviewed Grievance Form (Internal & External) sighted complaints been taken and action been notified by assistant manager and completed within timeline as per procedure.</p> <p>Onsite interview with sampled among workers and invited external stakeholders informed they been briefed on Grievance Procedures during Internal Workers Meeting and External Stakeholders meeting.</p>	
<p>4.2.3</p>	<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>BPB maintain the current Grievance Procedures Doc. No.: HR/2022/023/003, Rev.0, Issues: 01/03/2022.</p> <p>Document review on complaints book and stakeholder consultation interview with no complaints raised as at audit.</p> <p>Latest complaints at Chamek Estate, Kulai Young Estate, Telok Sengat POM and Telok Sengat Estate are related to housing</p>	<p>Complied</p>

		<p>maintenance. Reviewed Grievance Form (Internal & External) sighted complaints been taken and action been notified by assistant manager and completed within timeline as per procedure.</p> <p>Onsite interview with sampled among workers and invited external stakeholders informed they been briefed on Grievance Procedures during Internal Workers Meeting and External Stakeholders meeting.</p>	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>Neither any complaints nor land dispute occurred in Chamek Estate, Kulai Young Estate, Telok Sengat POM and Telok Sengat Estate at the time of audit that require the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p>	Complied
<p>Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>BPB continuously contributes to local sustainable development with employment opportunities given to the local population and surrounding communities of the estates. The company practice to have a close relationship with employees who rely on the company for much of their social and economic needs.</p> <p>The continuation initiative describes in the company's website as per link as following: https://www.bousteadplantations.com.my/corporate-responsibility/</p> <p>Telok Sengat Business Unit managements continuously contribute to local communities with donation to the school, religious activities at mosques/temple activities and job opportunity to the local communities.</p> <p>While contribution to workers, Telok Sengat Business Unit management continue BPB initiative to allocate monthly allowance for the workers' children who are studying secondary school,</p>	Complied

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		provide opportunity for the university students and organized family day. All the activities organized provided with photo evidence.	
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	<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>Telok Sengat Business Unit able to demonstrate the evidence of legal ownership if its lands through possession of land titles.</p> <p>Estates in Telok Sengat Business Unit management has a list summary of 76 land titles with information of names of leased, hectare, terms & conditions, lease period and grant numbers.</p> <p>Copies of the land titles were available at all respective estates' offices.</p> <p>Example</p> <p>BPB has entered into Estate Management Agreement dated 28/09/2021 between Boustead Agency and Consultancy Services Sdn. Bhd. And SIPP Power Sdn Bhd for period of five (5) years. With the agreement, Kulai Young Estate maintained to keep the current five (5) of land titles without a change as following:</p> <ol style="list-style-type: none"> 1. HSD 64xxx 2. HSD 64xxx 3. GRN 229xxx 4. HSD 64xxx 5. HSD 64xxx 	Complied
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	There is no dispute reported in Telok Sengat Business Unit estates as the land is belong to BPB. The estates' land has legal ownership to BPB Group of Estates under Telok Sengat Business Unit for Oil Palm Plantation activities.	Complied

		The surrounding areas owned by smallholders and other plantation’s companies. There’s no evidence of land encroachment by the mill and all estates within Telok Sengat Business Unit.	
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities’ and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	There is no dispute reported in Telok Sengat Business Unit estates as the land is belong to BPB. The estates’ land has legal ownership to BPB Group of Estates under Telok Sengat Business Unit for Oil Palm Plantation activities. The surrounding areas owned by smallholders and other plantation’s companies. There’s no evidence of land encroachment by the mill and all estates within Telok Sengat Business Unit.	Complied
4.4.2b	Evidence that the unit of certification has respected communities’ decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	Evidence of documentations and stakeholder consultation shown that no customary land and encroachment within Telok Sengat Business Unit estates. This was verified through stakeholders’ consultation.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification’s title, concession or lease on the land. - Minor compliance -	Evidence of documentations and stakeholder consultation shown that no customary land and encroachment within Telok Sengat Business Unit estates. This was verified through stakeholders’ consultation.	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	Maps available in all estates. No recognised legal, customary or other user rights in Telok Sengat Estate and Chamek Estate with demonstrated land ownership documents. For Kulai Estate, BPB has entered into agreement of Estate Management Agreement for Kulai Young Estate between Boustead Agency and Consultancy Services Sdn. Bhd. And SIPP Power Sdn Bhd for period of five (5) years since the acquirement of Kulai Estate for development.	Complied

4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	Evidence of documentations and stakeholder consultation shown that no customary land and encroachment within Telok Sengat Business Unit estates. This was verified through stakeholders' consultation and not requires FPIC process since the last audit	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	Evidence of documentations and stakeholder consultation shown that no customary land and encroachment within Telok Sengat Business Unit estates. This was verified through stakeholders' consultation and not requires FPIC process since the last audit	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	Evidence of documentations and stakeholder consultation shown that no customary land and encroachment within Telok Sengat Business Unit estates. This was verified through stakeholders' consultation and not requires FPIC process since the last audit.	Complied
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	Telok Sengat Business Unit able to demonstrate the evidence of legal ownership if its lands through possession of land titles. Estates in Telok Sengat Business Unit management has a list summary of 76 land titles with information of names of leased, hectare, terms & conditions, lease period and grant numbers. No new planting and issues of customary land occurs in estates within Telok Sengat Business Unit estates that requires FPIC process since the last audit. Onsite interview with relevant external stakeholders informed no new planting activities conducted. Therefore, not applicable.	Not Applicable

4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting and issues of customary land occurs in estates within Telok Sengat Business Unit estates that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conducted.</p> <p>Therefore, not applicable.</p>	Not Applicable
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occurs in estates within Telok Sengat Business Unit estates that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conducted.</p> <p>Therefore, not applicable.</p>	Not Applicable
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occurs in estates within Telok Sengat Business Unit estates that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conducted.</p> <p>Therefore, not applicable.</p>	Not Applicable
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occurs in estates within Telok Sengat Business Unit estates that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conducted.</p> <p>Therefore, not applicable.</p>	Not Applicable

4.5.6	<p>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.</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occurs in estates within Telok Sengat Business Unit estates that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conducted.</p> <p>Therefore, not applicable.</p>	Not Applicable
4.5.7	<p>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.</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occurs in estates within Telok Sengat Business Unit estates that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conducted.</p> <p>Therefore, not applicable.</p>	Not Applicable
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting and issues of customary land occurs in estates within Telok Sengat Business Unit estates that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conducted.</p> <p>Therefore, not applicable.</p>	Not Applicable
<p>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.</p>			
4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>BPB established Procedure of Fair Compensation with Ref. No.: 01 dated 04/02/2015. The procedure describes of case of any compensation required, the process will be manageable and to ensure the implementation of a fair compensation for any issue/disputes related to land power to claim rights, ownership, and access to land between parties involved in considering differences in ethic group, gender differences and etc. if any.</p>	Complied

		<p>The procedure also describes management to ensure that any negotiation concerning Indigenous people, local communities and other stakeholders are treated fairly and to have mutual benefit of the company and the parties involved.</p> <p>No new planting and issues of customary land occurs in estates within Telok Sengat Business Unit estates that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conducted.</p>	
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>BPB established Procedure of Fair Compensation with Ref. No.: 01 dated 04/02/2015.</p> <p>No new planting and issues of customary land occurs in estates within Telok Sengat Business Unit estates that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conducted.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	<p>BPB established Procedure of Fair Compensation with Ref. No.: 01 dated 04/02/2015.</p> <p>No scheme small holdings within Telok Sengat Business Unit. No new planting and issues of customary land occurs in estates within Telok Sengat Business Unit estates that requires FPIC process since the last audit.</p> <p>Onsite interview with relevant external stakeholders informed no new planting activities conducted.</p> <p>Therefore, not applicable.</p>	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>BPB established Procedure of Fair Compensation with Ref. No.: 01 dated 04/02/2015.</p>	Not Applicable

	- Minor compliance -	No new planting and issues of customary land occurs in estates within Telok Sengat Business Unit estates that requires FPIC process since the last audit. Onsite interview with relevant external stakeholders informed no new planting activities conducted. Therefore, not applicable.	
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	BPB established Procedure of Fair Compensation with Ref. No.: 01 dated 04/02/2015. No new planting and issues of customary land occurs in estates within Telok Sengat Business Unit estates that requires FPIC process since the last audit. Onsite interview with relevant external stakeholders informed no new planting activities conducted.	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	BPB established Procedure of Fair Compensation with Ref. No.: 01 dated 04/02/2015. No new planting and issues of customary land occurs in estates within Telok Sengat Business Unit estates that requires FPIC process since the last audit. Onsite interview with relevant external stakeholders informed no new planting activities conducted.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -	BPB established Procedure of Fair Compensation with Ref. No.: 01 dated 04/02/2015. No new planting and issues of customary land occurs in estates within Telok Sengat Business Unit estates that requires FPIC process since the last audit.	Not Applicable

		Onsite interview with relevant external stakeholders informed no new planting activities conducted. Therefore, not applicable.	
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 -	BPB established Procedure of Fair Compensation with Ref. No.: 01 dated 04/02/2015. No new planting and issues of customary land occurs in estates within Telok Sengat Business Unit estates that requires FPIC process since the last audit. Onsite interview with relevant external stakeholders informed no new planting activities conducted. Therefore, not applicable.	Not Applicable
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	BPB established Procedure of Fair Compensation with Ref. No.: 01 dated 04/02/2015. No new planting and issues of customary land occurs in estates within Telok Sengat Business Unit estates that requires FPIC process since the last audit. Onsite interview with relevant external stakeholders informed no new planting activities conducted. Therefore, not applicable.	Not Applicable
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	BPB established Procedure of Fair Compensation with Ref. No.: 01 dated 04/02/2015. No new planting and issues of customary land occurs in estates within Telok Sengat Business Unit estates that requires FPIC process since the last audit. Onsite interview with relevant external stakeholders informed no new planting activities conducted.	Not Applicable

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		Therefore, not applicable.	
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	BPB established Procedure of Fair Compensation with Ref. No.: 01 dated 04/02/2015. No new planting and issues of customary land occurs in estates within Telok Sengat Business Unit estates that requires FPIC process since the last audit. Onsite interview with relevant external stakeholders informed no new planting activities conducted. Therefore, not applicable.	Not Applicable
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Price of current FFB price was prominently displayed at the mill outside the weighbridge counter and updated on monthly basis. Prices are mainly based on MPOB announcement. Previous FFB price was recorded in 'Monthly FFB Purchase' file, based on "Telok Sengat Palm Oil Mill Own Estate – Boustead Estates Agency Sdn Bhd (Marketing Department)" letter issued by Marketing department on monthly basis. Calculation of FFB price is based on 'Kadar Perahan 1% (MPOB)' guideline. Each of the grower will be updated on the new price and issued with "Computation of Payment for FFB Purchased" for reference and cross checking. Sighted the latest notification by Boustead Estates Agency Sdn. Bhd. Marketing Department Addendum to The Boustead FFB Purchase Agreement; Date: 8/6/2023.	Complied
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	Evidence available as sample per FFB Purchase Agreement as following: - Agreement # 2020-0036; Date: 1/1/2020 between Boustead Telok Sengat Sdn. Bhd. and UM Plantations Sdn. Bhd.	Complied

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		<ul style="list-style-type: none"> - Agreement # 2020-0034; Date: 1/4/2020 between Boustead Telok Sengat Sdn. Bhd. and Jaya Sewajar Sdn. Bhd. <p>Latest briefing on pricing conducted on 8/6/2023 based on the Addendum to the Boustead FFB Purchase Agreement.</p>	
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>FFB pricing and calculation was included in the FFB Purchase Agreement which was based on the MPOB prices as well as the FFB grading quality.</p>	Complied
5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>Evidence that the mill involved all parties available in the contract agreement as per sample sighted for the external FFB supplier by Boustead Estates Agency Sdn Bhd (Marketing Department) personnel to all smallholder’s suppliers through purchase agreement as per samples as following:</p> <ul style="list-style-type: none"> - Agreement # 2020-0036; Date: 1/1/2020 between Boustead Telok Sengat Sdn. Bhd. and UM Plantations Sdn. Bhd. - Agreement # 2020-0034; Date: 1/4/2020 between Boustead Telok Sengat Sdn. Bhd. and Jaya Sewajar Sdn. Bhd. 	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Contracts are fair, legal and transparent and have an agreed timeframe as per sample sighted as following:</p> <ul style="list-style-type: none"> - Agreement # 2020-0036; Date: 1/1/2020 between Boustead Telok Sengat Sdn. Bhd. and UM Plantations Sdn. Bhd. - Agreement # 2020-0034; Date: 1/4/2020 between Boustead Telok Sengat Sdn. Bhd. and Jaya Sewajar Sdn. Bhd. <p>These were also reflective in the estate contractor’s FFB Harvesting Contracts # TSE/H 008-2023; MOU between Boustead Plantations Berhad and Voon Siaw Phin; Period 1/1/2023 – 31/12/2023.</p>	Complied
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p>	<p>Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given as per sample Computation of Payment for FFB Purchased by Telok</p>	Complied

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	- Critical (Major) compliance -	Sengat Palm Oil Mill (Boustead Telok Sengat Sdn. Bhd.) for month of May 2023 for FFB suppliers as following: <ul style="list-style-type: none"> - Bukit Tinggi Estate (Rudijaya Sdn. Bhd.) - Jaya Sewajar Sdn. Bhd. - UM Plantation Sdn. Bhd. - Angtong Estates Sdn. Bhd. 	
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	Weighbridges used for determining payment to smallholders are verified by the authority as per weighbridge calibration & stamping records of Perakuan Penentuan Timbang dan Sukat Ref. # B2062615; Instrument Serial # 163650133; Date: 14/11/2022; By: Metrology Corporation Malaysia Sdn. Bhd.	Complied
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 -	The mill supports the FFB Suppliers among independent smallholders in certification through consultation and information sharing upon requested. Consultation made with smallholders confirmed that they were provided with information of sustainable certifications mainly in MSPO since it is mandatory for the smallholders.	Complied
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 -	Telok Sengat POM hold regular periodical meeting with external FFB suppliers to discuss any feedbacks or grievance as per sample latest meeting conducted on 8/6/2023 recorded in the minutes of meeting session 1/2023. No issue of grievance being raised among external FFB suppliers.	Complied
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.	Telok Sengat POM continuously supports the FFB suppliers among independent smallholders in certification through consultation and information sharing upon requested. Consultation made with smallholders includes the agenda in external stakeholders' minutes of meeting. Based on the minutes, confirmed the consultation been	Complied

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	- Minor compliance -	provided with information of sustainable certifications mainly in MSPO certification since its mandatory for the smallholders but not interested in RSPO certification.	
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	Telok Sengat POM continuously supports the FFB suppliers among independent smallholders in certification through consultation and information sharing upon requested. Consultation made with smallholders includes the agenda in external stakeholders' minutes of meeting. Based on the minutes, confirmed the consultation been provided with information of sustainable certifications mainly in MSPO certification since its mandatory for the smallholders but not interested in RSPO certification.	Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Telok Sengat POM continuously supports the FFB suppliers among independent smallholders in certification through consultation and information sharing upon requested. Consultation made with smallholders includes the agenda in external stakeholders' minutes of meeting. Based on the minutes, confirmed the consultation been provided with information of sustainable certifications mainly in MSPO certification since its mandatory for the smallholders including legality of FFB production.	Complied
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Not applicable since no Scheme Smallholders within Telok Sengat Business Unit.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Not applicable since no Scheme Smallholders within Telok Sengat Business Unit.	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			

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<p>6.1.1</p>	<p>(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -</p>	<p>BPB maintain the current Human Rights Policy signed by Chief Executive Officer dated 02/12/2019. The company is committed to ensure every individual are treated with fairness, dignity, and respect with no discrimination.</p> <p>BPB maintain the other of current Equal Opportunities Policy signed by Chief Executive Officer dated 2/12/2019 which emphasized the company's stand on providing and ensuring equal opportunities among all employees, customers, business partners and publics.</p> <p>Policies available publicly in all estates and mill within Telok Sengat Business Unit.</p> <p>Policies communicated frequently through internal meeting with workers attached the records of training attendance list, photo evident and training materials as follow dates.</p> <ol style="list-style-type: none"> 1. Chamek Estate on 19/05/2022 and 27/02/2023. 2. Kulai Young on 11/03/2023. 3. Telok Sengat Estate on 02/04/2023. 4. Telok Sengat POM on 10/04/2023. <p>While for external stakeholders meeting conduct annually as follow.</p> <ol style="list-style-type: none"> 1. Chamek Estate on 05/08/2022. 2. Kulai Young on 22/06/2023. 3. Telok Sengat Estate and Telok Sengat POM on 09/06/2023. <p>Based on the visit, information available displayed at board in operation unit area includes Human Rights Policy are in both English and Bahasa.</p>	<p>Complied</p>
<p>6.1.2</p>	<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>Telok Sengat Business Unit management treated all workers equally such as provided free accommodation and medical to all the</p>	<p>Complied</p>

	<p>- Critical (Major) compliance -</p>	<p>workers, no charging of recruitment fees for the foreign workers and offered job based on capability.</p> <p>Review employee master-list verified the composition of workers consisted of local, foreign workers, male and female workers.</p> <p>Onsite interview conducted with the sampled workers informed they are no discrimination based on nationalities, gender and religious which is imposed by management. They informed overtime offered to all the workers without any prejudice based on caste, gender, race, and nationalities. They informed that they could request for job transfer if they found they unfit for the job assigned to them.</p>	
<p>6.1.3</p>	<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>In-line with national policies, BPB demonstrated priorities in local employment whilst maintain the current Foreign Workers Procedure revision no. 1 established on Jan 2016. The procedure describes management is to ensure the estates/ mills follow the correct steps in employment of foreign workers as stipulated by the government agencies/ state government. The company will apply job order online at Labour Department website before recruiting foreign workers.</p> <p>BPB established the Foreign Workers Policy as guideline for company to ensure all the workers recruited will be treated equally without discrimination based on nationalities, caste, religion and etc. Medical fitness will be checked prior to work to ensure fitness to the work as per FOMEMA and legal requirements.</p> <p>Review employee master-list verified sighted local and foreign workers who been newly employed by Chamek Estate, Kulai Young Estate, Telok Sengat Estate and Telok Sengat POM with latest by June 2023 confirmed that process of hiring of all workers is implemented according to regulation based on suitability and nature of job offered.</p>	<p>Complied</p>

		Onsite interview conducted with the sampled workers informed they are no discrimination based on nationalities, gender and religious which is imposed by management. They also have access to training and promotion based on skills, capabilities, qualities and medical fitness for jobs available.	
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>Telok Sengat Business Unit management treated all workers equally as company is committed to ensure every individual are treated with fairness, dignity, and respect with no discrimination.</p> <p>There is no evidence that pregnancy tests are being conducted as a discriminatory measure. Pregnancy test will be conducted by the Estate Hospital Assistant upon request by female employee. During this audit period, there is no record of any pregnant female workers.</p> <p>Onsite interviewed with sampled female workers informed no pregnancy testing conducted prior to work. They still will be able to offer for work if they are pregnant however with lite duty task.</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>BPB maintain the current Human Rights Policy signed by Chief Executive Officer dated 02/12/2019. The company is committed to ensure every individual are treated with fairness, dignity, and respect with no discrimination.</p> <p>Telok Sengat Business Unit's Women committees established is to manage on increase the awareness, identify, and address issues of concern, as well as opportunities and improvements for women.</p> <p>Review on sample Telok Sengat Business Unit, it was verified in the minutes of Gender Committee Meeting sighted the agenda includes the gender activities and other related issues to female workers/members.</p> <p>As at the audit time, no sexual harassment case reported so far at all OUs and reported in Gender committee meeting was sighted.</p>	OFI

		<p><u>Opportunity for Improvement (OFI)</u></p> <p>The management may improve the agenda in minutes of Gender Committee meeting for discuss of all related issues for improving women at workplace.</p>	
<p>6.1.6</p>	<p>There is evidence of equal pay for the same work scope. - Minor compliance -</p>	<p>BPB maintain the current Human Rights Policy signed by Chief Executive Officer dated 02/12/2019. The company is committed to ensure every individual are treated with fairness, dignity, and respect with no discrimination.</p> <p>Document review on the employment contract, sighted the job description of each workers mention the same regardless of skin colour, religion, race, or caste.</p> <p>Evidence of equal pay for the same work scope available as per sample documents of pay including work agreement, payslips and attendance of July 2022, December 2022 and May 2023 sighted for workers as following:</p> <p>The sample for 23 sample workers' employment contract and payslip as follows.</p> <ol style="list-style-type: none"> 1. Chamek Estate; 5 sample workers 2. Kulai Young Estate; 4 sample workers 3. Telok Sengat Estate; 7 sample workers 4. Telok Sengat POM; 7 sample workers <p>Document review on sample workers' payslip, it was verified wages paid are equal based on job scope, number of working days, number of overtimes offered and working incentives.</p> <p>Onsite interviewed with sampled workers informed they has not any discrimination based on religion, gender, nationality during their recruitment. They agreed that their salary is paid equally based on job task.</p>	<p>Complied</p>

Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>BPB has already signed the Collective Agreement with National Union of Plantation Workers (NUPW).</p> <p>Based on the agreement, sighted Telok Sengat POM workers agreements are based on the MAPA/NUPW Palm Oil Mill Employees Agreement 2019.</p> <p>While Telok Sengat Estate, Chamek Estate and Kulai Young Estate workers agreements are based on MAPA/NUPW Agreement on the Wage of Harvesters, Harvesting Kanganies, Loaders and Other Loaders on Oil Palm Estates 2019 and MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement 2019.</p> <p>Onsite interview with sampled workers informed upon arrived from home countries, they inducted on the terms and conditions based on employment contract and briefed on the company's policies.</p>	Complied
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>Document review on sampled workers' employment contracts, sighted the document been translated with various languages includes Bahasa, English and others language of workers' origin countries. The contract stipulates terms of conditions of service such position, period of employment, types of work, responsibilities of employer, responsibilities of employee, salary payable, working hours, annual leave, sick leave, deductions, overtime, public holiday entitlement, maternity leave, reasons for dismissal, period of notice, facilities, etc.</p> <p>Both mill and estate workers collective agreements been included with MAPA/NUPW additional agreement in-line with Minimum Wage Order 2020.</p> <p>Document review on sampled workers' payslip, sighted details of daily-rated wages, piece rated wages, payment for any overtime</p>	Complied

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		<p>work done, public holiday pay and salary deductions. Salary deduction and overtime were in accordance with the relevant laws (SOCSO, EPF, EIS) and Labour Office permits.</p> <p>To confirmed on the no illegally work imposed in estates and mill, verified during onsite visit to workers housing and field operation with no illegal workers were hired observed.</p> <p>While interview session based on sampled workers based on master list provided it's were verified no illegal workers were hired for each operating units to perform job task offered.</p> <p>Example Telok Sengat POM conduct General Assembly Meeting for Year 2023 on 09/01/2023 and 16/01/2023. The meeting includes agenda of Employment Act consist of maternity, paternity, working hours.</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. - Critical (Major) compliance -</p>	<p>Records of payslip and check-roll documents available to the workers for sample employees sighted as per indicator 6.1.6 above shown 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>Telok Sengat Business Unit managements demonstrate compliance with Employment Act 1955 related to regular working hours, overtime, sickness and holiday entitlement, maternity leave, etc.</p> <p>Document review, Telok Sengat Business Unit management maintain and monitor the compliance through workers' punch cards, workers' attendants, workers' employment contracts and workers' payslips.</p> <p>Reviewed on the sampled 23 workers' employment contracts and payslips for the month of July 2022 (low), December 2022 (high) and April 2023 (medium) confirmed is in according to requirement</p>	<p>Complied</p>

		<p>as follows.</p> <ol style="list-style-type: none"> 1. Chamek Estate; 5 sample workers 2. Kulai Young Estate; 4 sample workers 3. Telok Sengat Estate; 7 sample workers 4. Telok Sengat POM; 7 sample workers <p>Review on the sampled employee payslip, sighted the information such as piece rates wages, daily rate, paid Public Holiday, paid Medical Sick, paid for rest day, and overtime. Other's information includes rest day, Public Holiday, SOCSO (employer contribution) and wages deduction.</p>	
<p>6.2.4</p>	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Telok Sengat Business managements maintain the current basic amenities and facilities at the quarters provided to the workers includes good sanitation, estate clinics, mosque, temples, electricity supplies, water supplies, sundry shops within estate compound and domestic waste disposal. Electricity and water were supplied by government and any of excess usage of both amenities will be deducted from salary.</p> <p>For local workers with family, each will be given a house. While for single foreign workers, it will be given shared house of 2 people per room. All foreign workers will be given a starter kit which includes basis amenities such mattress, cupboard, cooking utilities, etc.</p> <p>Based on the Workers' Minimum Standards Housing and Amenities (Amendment) Act 2019, housing areas were inspected at least twice a month and inspection report were documented in 'Line Site Inspection Logbook' as follow.</p> <ol style="list-style-type: none"> 1. Chamek Estate conduct housing inspection by Hospital Assistant (HA) with latest on 20/04/2023, 03/05/2023, 09/05/2023, 18/05/2023, 25/05/2023. 	<p>Non-compliance</p>

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		<p>2. Kulai Young Estate conduct housing inspection by Hospital Assistant (HA) with latest on 24/02/2023, 03/03/2023, 09/03/2023, 16/02/2023, 30/03/2023, 04/04/2023, 13/04/2023, 20/04/2023, 28/04/2023, 05/05/2023, 11/05/2023, 18/05/2023, 26/05/2023, 07/06/2023.</p> <p>3. Telok Sengat POM conduct housing inspection by Staff with latest on 04/04/2023, 12/04/2023, 19/04/2023, 25/04/2023, 03/05/2023, 10/05/2023, 18/05/2023, 25/05/2023, 05/06/2023, 12/06/2023.</p> <p>4. Kulai Young Estate conduct housing inspection by Hospital Assistant (HA) with latest on 24/02/2023, 03/03/2023, 09/03/2023, 16/02/2023, 30/03/2023, 04/04/2023, 13/04/2023, 20/04/2023, 28/04/2023, 05/05/2023, 11/05/2023, 18/05/2023, 26/05/2023, 07/06/2023.</p> <p>While visiting medical officer will be visited estates fortnight a month as follow.</p> <p>1. Chamek Estate been fortnight visited by Dr. Louis Nethanel Johnson, Visiting Medical Officer (VMO) latest on 27/02/2023, 07/03/2023, 16/03/2023, 05/04/2023, 26/04/2023, 11/05/2023, 25/05/2023.</p> <p>2. Kulai Young Estate been fortnight visited by Dr. Kirupavathy A/P Subbarayan, Visiting Medical Officer (VMO) latest on 28/02/2023, 16/03/2023, 30/03/2023, 12/04/2023, 26/04/2023, 11/05/2023, 25/05/2023.</p> <p>3. Telok Sengat Estate been fortnight visited by Dr. Hj. Moiz bin Siraj, Visiting Medical Officer (VMO) latest on 11/01/2023, 06/02/2023, 16/03/2023, 03/04/2023, 09/05/2023 and 07/06/2023.</p>	
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		<p>Major Non-conformance (Major NC)</p> <p>Monitoring on visiting medical officer’s frequency was not effectively demonstrated.</p> <p>Based on the visit report by Dr. Hj. Moiz bin Siraj, the Visiting Medical Officer (VMO) lodged the report with dates in year 2023 from 11/01/2023, 06/02/2023, 16/03/2023, 03/04/2023, 09/05/2023 and 07/06/2023. However, the practice is not according with the requirement stated in Section 19 (3) Where a clinic exists on any estate or is established pursuant to an order under subsection (1), it shall be the duty of the employer to arrange for a registered medical practitioner to visit the clinic at least once a fortnight to supervise the operations and management of the clinic and to provide medical treatment to employees and their dependants.</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>The management ensured the access to adequate, sufficient, and affordable food by providing signing a canteen and sundry shop facility to workers within estate area. Sighted the samples of canteen and sundry shop tenancy agreement as following:</p> <p>Chamek Estate, Kulai Young Estate, Telok Sengat POM and Telok Sengat Estate managements makes efforts to maintain workers’ access to adequate, sufficient, and affordable food by establishing sundry shops and cafes located within estates compound. Price of goods was displayed at the sundry shops.</p> <p>All estates and mill near to the nearest town which giving the opportunity to workers to access for adequate and sufficient foods and goods at competitive prices.</p> <p>Onsite interviewed with sampled workers informed they can easily purchase foods at the nearest shop or choose to go nearest towns using their own transport or public transport.</p> <p>In additional, Chamek Estate, Kulai Young Estate, Telok Sengat</p>	Complied

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		<p>POM and Telok Sengat Estate managements ensured affordable goods and food for its workers by acquired the list of goods prices from sundry shop and café operators periodically.</p> <p>Example Telok Sengat Estate issued Memorandum of Agreement Shop House/Canteen between the estate management and Sxxx Mxxx; Agreement dated 01/01/2023. The agreement is valid from 01/01/2023 until 31/12/2023.</p>	
<p>6.2.6</p>	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, 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</p>	<p>BPB established to assess paid to all workers including housing, electricity, water, education, creche facilities, healthcare, transport, clothing, food, sports, recreation facilities, and total costs of in-kind benefits. Based on the assessed, each operating units under Telok Sengat Business Unit will conduct individual assessment of workers prevailing wages based on the monthly In-Kind benefits.</p> <p>Based on the latest assessment result conduct in April 2023, the Total Value of Prevailing Wages as follow.</p> <ol style="list-style-type: none"> 1. Chamek Estate; the prevailing wage for local workers is MYR1,785.00 and foreign workers is MYR1,785.00. 2. Kulai Young Estate; the prevailing wage for local workers is MYR2,016.29 and foreign workers is MYR2,030.27. 3. Telok Sengat Estate; the prevailing wage for local workers is MYR1,868.00 and foreign workers is MYR1,868.00. 4. Telok Sengat POM; the prevailing wage for local workers is MYR1,868.00. No foreign workers at the mill. 	<p>Complied</p>

	<p>with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • 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 including contractors' workers and contracted workers 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 documentation review, interviews and field observations, there is no evidence that the units within the Telok Sengat Business Unit employ any casual, temporary and day labour. All employees are employed on either permanent or contractual full-time basis.</p>	Complied
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa</p>	<p>Telok Sengat Business Unit adopt the current BPB's Freedom of Association Policy signed by Chief Executive Officer dated</p>	Complied

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	<p>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>02/12/2019. The policy emphasized that the company is committed to support employees' rights in freedom of association. BPB through its Telok Sengat Business Unit respect the rights of all personnel to form and join trade unions of their choice to bargain collectively and the workers have their freedom to join the NUPW/MAPA union.</p> <p>Onsite interview with sampled workers informed no restriction from the company to allow workers to join trade union. The workers have their freedom to join the NUPW/MAPA union.</p>	
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Chamek Estate, Kulai Young Estate, Telok Sengat POM and Telok Sengat Estate sent representatives to attend Johor State's Branch Union Meeting of 77 years which conduct on 14/02/2023 (Kluang) and 15/02/2023 (Segamat).</p> <p>BPB maintain the current practice of conduct two ways communication to discuss issues related unions who are freely elected.</p> <p>Document review of sampled estates and mill sighted NUPW minutes of meeting available in Bahasa Malaysia and had been discuss with date as follow.</p> <ol style="list-style-type: none"> 1. Chamek Estate conduct on 22/06/2022 and 23/02/2023. 2. Kulai Young Estate conduct on 28/02/2023. 3. Telok Sengat Estate conduct on 25/02/2023 4. Telok Sengat POM conduct on 24/02/2023. <p>Onsite interview with NUPW representative informed they attended to represent workers who are freely elected among workers.</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely</p>	<p>Workers are free to elect their own representatives to be as the representative for Workers' Community.</p>	Complied

	<p>elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Onsite interview with sampled of local and foreign workers informed the management remain to not interfere of any of the committee formation, discussions, and decision of the committee.</p>	
<p>Criterion 6.4: Children are not employed or exploited.</p>			
<p>6.4.1</p>	<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>Telok Sengat Business Unit implemented the current BPB Children Employment and Minimum Age Limit Policy signed by Chief Executive Officer date 02/12/2019. The policy emphasized that the company is committed to ensure all workers and children safety are protected and all employment are within minimum age limit and in compliance with national regulations and state ordinance. The policy too is subjected to the International Labour Organization (ILO) Convention 138 (1973).</p> <p>Policy communicated frequently through internal meeting with workers attached the records of training attendance list, photo evident and training materials as follow dates.</p> <ol style="list-style-type: none"> 1. Chamek Estate on 19/05/2022 and 27/02/2023. 2. Kulai Young on 11/03/2023. 3. Telok Sengat Estate on 02/04/2023. 4. Telok Sengat POM on 10/04/2023. <p>While for external stakeholders meeting conduct annually as follow.</p> <ol style="list-style-type: none"> 1. Chamek Estate on 05/08/2022. 2. Kulai Young on 22/06/2023. 3. Telok Sengat Estate and Telok Sengat POM on 09/06/2023. <p>Based on the visit, information available displayed at board in operation unit area includes Children Employment and Minimum Age Limit Policy in both English and Bahasa.</p> <p>Onsite visit and interviewed with sampled workers informed they are no child employed. This is confirmed with the verification of</p>	<p>Complied</p>

		workers master list at each of sampled estates/mill and list of contractors/vendors' workers files. Document review of sampled contractor, sighted Telok Sengat Business Unit management monitor contractor's workers kept in each estates/ mill verified the list has no workers underage of 18 years old hired.	
6.4.2	(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. - Critical (Major) compliance -	Telok Sengat Business Unit maintain the current practices to kept records of employment documentation and verified from the Employee Master Lists that all workers are at the minimum age requirements of above 18 years. The computerized HR database system able to verify and screen the age of employees upon data entry.	Complied
6.4.3	(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance -	Telok Sengat Business Unit Based managements continuously implemented the practices ensures no young with aged below 18 years old are employed. Document review on the workers master list verified no young person below 18 years old employed. Onsite interviewed with both estates and mill sampled workers informed they are above 18 years when they apply job with the company.	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -	Telok Sengat Business Unit Based managements continuously implemented the practices ensures no young with aged below 18 years old are employed. Onsite interviewed with both estates and mill sampled workers informed they are above 18 years when they apply job with the company. Policy also communicated to external stakeholder during latest external stakeholder consultation meeting.	Complied

Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Telok Sengat Business Unit adopt BPB Anti-harassment policy statement” dated 01/03/2022 signed by CEO. The policy emphasized that the company is committed to ensure prevention of sexual and all other forms of harassment and violence in the workplace and within company’s premises with heavy disciplinary action will be impose to any perpetrator.</p> <p>Policy communicated frequently through internal meeting with workers attached the records of training attendance list, photo evident and training materials as follow dates.</p> <ol style="list-style-type: none"> 1. Chamek Estate on 19/05/2022 and 27/02/2023. 2. Kulai Young on 11/03/2023. 3. Telok Sengat Estate on 02/04/2023. 4. Telok Sengat POM on 10/04/2023. <p>While for external stakeholders meeting conduct annually as follow.</p> <ol style="list-style-type: none"> 1. Chamek Estate on 05/08/2022. 2. Kulai Young on 22/06/2023. 3. Telok Sengat Estate and Telok Sengat POM on 09/06/2023. <p>Based on the visit, information available displayed at board in operation unit area includes Sexual Harassment Policy in both English and Bahasa.</p>	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Telok Sengat Business Unit adopt BPB Reproductive Rights Policy signed by Chief Executive Officer dated 02/12/2019. The policy emphasized that the company is committed to ensure the reproductive rights of all, especially women are protected.</p>	Complied

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6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>Telok Sengat Business Unit conduct assessment for new needs for new mother was conducted by 'Persatuan Wanita' at each operating unit. Document review verified that there are no new mothers identified at sampled estates/ mill.</p> <p>Onsite interview conducted with women committee representatives confirmed that there are no new mothers. Therefore, there are not need applicable to identified as actions to address needs based on assessment conducted.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p>	<p>Telok Sengat Business Unit adopt BPB Complaint on Sexual Harassment Procedure and Flowchart established as guideline for actions to be taken if any case reported.</p>	Complied

	<p>- Minor compliance -</p>	<p>Document review on grievance records verified no issues lodged that require the implementation of the mechanism occurs in all operating units within Telok Sengat Business Unit managements since the last audit.</p> <p>Example of gender committee or 'Persatuan Wanita' minutes of meeting conduct as follow.</p> <p>'Persatuan Wanita' from Telok Sengat Estate and Telok Sengat POM has conduct combine meeting on 15/03/2023 as mechanism to discuss agenda on social issues, women activities, and complaints/grievance report. Based on the minutes of meeting review, verified no complaints/grievance lodged.</p> <p>Onsite interview with sampled workers from both sampled estates and mill, informed they been briefed on the information of grievance mechanism, which respects anonymity and protects complainants.</p>	
<p>Criterion 6.6: No forms of forced or trafficked labour are used.</p>			
<p>6.6.1</p>	<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>Based on documentation review, interviews with workers at the estates/ mill; and observations onsite verified Telok Sengat Business Unit managements do not implement any form of forced labour at workplace.</p> <p>Based on criteria, the employment is voluntarily as follow.</p> <p>Retention of documents: Telok Sengat Business Unit Managements given option to all foreign workers are whether to keep their own passports, or to keep them securely at the office with concern letter as evidence of request to place the passports in the locker.</p> <p>Charging for recruitment fee: Telok Sengat Business Unit Managements adopt policy of prohibited recruitment fee imposed to workers since all employment cost were borne by the company.</p> <p>Involuntary overtime: Document review of workers attendance and payslip verified, overtime offered to all workers equally. Onsite</p>	<p>Complied</p>

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		<p>interviews with workers informed overtime are volunteer offered to them by Telok Sengat Business Unit Managements.</p> <p>Lack of freedom of workers to resign: Document review of workers employment contract verified, Terms and Conditions of Employment Contracts signed by all workers contains a provision for early termination of the contract where workers can give 14-days termination notice and workers are freedom to resign. Onsite interview with workers informed they are aware on the resignation terms.</p> <p>Penalty to workers for termination of employment: Document review of workers employment contract verified, the Terms and Conditions of Employment Contracts signed by all workers states that no penalty will be imposed for premature termination of the employment contract. Onsite interview with workers informed they are aware on the termination terms.</p> <p>Debt bondage: Onsite interview interviews with sampled workers informed they aware on the no form of debt bondage.</p> <p>Withholding of wages: Document review of workers employment contract and pay slips samples verified, there is no evidence of any wages being withheld from the workers. Onsite interview with workers informed they are aware that there's no withhold of wages terms as per employment contract.</p>	
6.6.2	<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>Telok Sengat Business Unit adopt BPB Foreign Workers Policy signed by Chief Executive Officer dated 02/12/2019. The policy emphasized that the company is committed to ensure the foreign workers employment are subjected to Malaysia legal requirements.</p> <p>Policy communicated frequently through internal meeting with workers attached the records of training attendance list, photo evident and training materials as follow dates.</p> <ol style="list-style-type: none"> 1. Chamek Estate on 19/05/2022 and 27/02/2023. 	Complied

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		<p>2. Kulai Young on 11/03/2023. 3. Telok Sengat Estate on 02/04/2023. 4. Telok Sengat POM on 10/04/2023.</p> <p>While for external stakeholders meeting conduct annually as follow.</p> <p>1. Chamek Estate on 05/08/2022. 2. Kulai Young on 22/06/2023. 3. Telok Sengat Estate and Telok Sengat POM on 09/06/2023.</p> <p>Based on the visit, information available displayed at board in operation unit area includes Foreign Workers Policy in both English and Bahasa.</p> <p>All the foreign workers will be provided with induction training prior to work. Besides, they were provided with decent living conditions and free from any discrimination. The workers informed that they were treated equally without any discrimination and allowed joining NUPW freely. No contract substitution has occurred through interviewed with the workers.</p> <p>Newly employed workers will be provided awareness and training to all the foreign workers for them to understand their responsibility in respect of human rights upon their arrival to Malaysia.</p>	
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The respective Estates Manager has been appointed as Chairman for Safety and Health Committee as per appointment letter signed by the Head of Business Unit.</p> <p>The Estates Manager has appointed representative from employer and employee and established Safety and Health Committee. The committee conducted meeting on quarterly basis. The meeting discusses the safety issues such as matters arising, accident and</p>	Complied

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		<p>incident report, workplace inspection report, Safety and Health program and any other matters.</p> <p>Reviewed the latest minutes meeting conducted as follows:</p> <table border="1" data-bbox="1137 475 1924 979"> <tr> <td>Operating Units</td> <td>02/2023</td> <td>01/2023</td> <td>04/2022</td> <td>03/2022</td> <td>02/2022</td> </tr> <tr> <td>Chamek Estate</td> <td>TBC</td> <td>20/03/2023</td> <td>21/12/2022</td> <td>08/11/2022</td> <td>22/06/2022</td> </tr> <tr> <td>Kulai Young Estate</td> <td>TBC</td> <td>17/03/2023</td> <td>09/12/2022</td> <td>23/09/2022</td> <td>23/06/2022</td> </tr> <tr> <td>Telok Sengat Estate</td> <td>06/06/2023</td> <td>21/03/2023</td> <td>08/12/2022</td> <td>08/11/2022</td> <td>18/07/2022</td> </tr> <tr> <td>Telok Sengat POM</td> <td>TBC</td> <td>14/03/2023</td> <td>29/11/2022</td> <td>08/09/2022</td> <td>24/05/2022</td> </tr> </table>	Operating Units	02/2023	01/2023	04/2022	03/2022	02/2022	Chamek Estate	TBC	20/03/2023	21/12/2022	08/11/2022	22/06/2022	Kulai Young Estate	TBC	17/03/2023	09/12/2022	23/09/2022	23/06/2022	Telok Sengat Estate	06/06/2023	21/03/2023	08/12/2022	08/11/2022	18/07/2022	Telok Sengat POM	TBC	14/03/2023	29/11/2022	08/09/2022	24/05/2022	
Operating Units	02/2023	01/2023	04/2022	03/2022	02/2022																												
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Telok Sengat POM	TBC	14/03/2023	29/11/2022	08/09/2022	24/05/2022																												
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>The operating units has established the procedure and flowcharts for Emergency Response Plan. The flowcharts cover on fire, chemical spillage, flood, accident and poisoning.</p> <p>The operating units has established emergency response team lead by the Manager as Emergency Commander and assist by firefighting team, first aid team, and riots, fights and thefts team. The information such as Emergency Contact Number, Emergency Evacuation, First Aid Locations, and Fire Extinguisher Locations, Emergency Response Plan (Fire, Chemical Spillage, Chemical Contamination, Flood and Accident) and displayed at strategic locations around the mill, estate office and stores.</p>	Complied																														

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		<p>For accidents reporting, Boustead Plantations Berhad has established Accident Reporting Structure, rev. no. 25/06/2021. Review SOP no. SSD/21/001.</p> <p>The estate has appointed supervisors and mandore as trained person for handling first aid. The person in charge has also send for competent first aider training. Reviewed the competent first aider certificate at all operating units.</p> <p>The estate reported the accident cases occur in the estate n monthly basis to the head office. Reviewed the Summary of Accident FY 2022 and to date May 2023.</p> <p>For accident cases with LTA more than 4 days and eligible for SOCSO claim, the estate maintains the records and reports. Reviewed the JKKP 6 reports. Accident investigation reports, and Form 34 - Details of Notices And Benefit Claims for accident occur in FY 2022 and 2023. The accident cases were discussed during Safety and Health Committee Meeting.</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>All workers in the operating units have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge.</p> <p>Reviewed PPE issuance records for Spraying Gang, Harvesting Gang and Manuring Gang at the estate and Laboratory, Boiler Station and Workshop at the mill.</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.</p>	Complied

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6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Medical care is provided to all the employees. Reviewed on workers profile records found that all workers are covered by the accident insurances.</p> <p>Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Reviewed the form 8A, "Jadual Caruman" for the month of May 2023, December 2022 and July 2022.</p> <p>For accident eligible for SOCSO claim, the operating units has made claim to SOCSO.</p>	Complied															
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated. JKPP 8 form were submitted to DOE through MyKKP systems. Sighted the samples of accident statistic FY 2022 as reported to DOSH as follows:</p> <table border="1" data-bbox="1249 938 1816 1217"> <thead> <tr> <th>Operating units</th> <th>Accident Cases</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>Chamek Estate</td> <td>0</td> <td>0</td> </tr> <tr> <td>Kulai Young Estate</td> <td>0</td> <td>0</td> </tr> <tr> <td>Telok Sengat Estate</td> <td>0</td> <td>0</td> </tr> <tr> <td>Telok Sengat POM</td> <td>4</td> <td>37</td> </tr> </tbody> </table>	Operating units	Accident Cases	LTA	Chamek Estate	0	0	Kulai Young Estate	0	0	Telok Sengat Estate	0	0	Telok Sengat POM	4	37	Complied
Operating units	Accident Cases	LTA																
Chamek Estate	0	0																
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Telok Sengat POM	4	37																

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.

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<p>7.1.1</p>	<p>(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -</p>	<p>The estates have established Integrated Pest Management Plan in order to reduce the usage of chemicals in pest control. Among the plan established as follows:</p> <ol style="list-style-type: none"> 1. Maintain beneficial plant, <i>Tunera Subulata</i> and <i>Cassia Cobanensis</i> along the field road 2. Purchase new barn owl 3. Fixing barn owl if needed 4. Census and record on total owl alive and monitoring barn condition (2 times per year) <p>Reviewed the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> 1. The estates sampled conducted the rat damage census 2 times per year. Reviewed the census records conducted in the month of January and February 2023 2. The estates conducted barn owl census 2 times per year. Reviewed the latest barn owl census report conducted in May and June 2023 3. The estates continuously planted beneficial plant along the field road as habitat for predator insects for pest as sighted during site visit. <p>The estates are in progress to replace the broken barn owl box in the estate. reviewed the barn owl box census conducted in the month of January and February 2023</p>	<p>Complied</p>
<p>7.1.2</p>	<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. - Minor compliance -</p>	<p>This is not practiced in the estates visited. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM.</p> <p>3 plant species were used for IPM to control pest. The beneficial plant planted such as <i>Tunera subulata</i>, <i>Cassia cobanensis</i>, and <i>Antigonan leptopus</i>.</p>	<p>Complied</p>

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7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>No evidence and records of fire usage for pest control at all estate visited.</p>	<p>Complied</p>																																
<p>Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>																																			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>Justification for pesticides usage were addressed in the Oil Palm Circular under section as follows:</p> <table border="1" data-bbox="1137 647 1930 1206"> <thead> <tr> <th>No.</th> <th>Title</th> <th>OPC no.</th> <th>Index</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td rowspan="2">2</td> <td rowspan="2">Weeding</td> <td>OPC 01.b</td> <td>Weed management in oil palm</td> <td>Dec 17</td> </tr> <tr> <td>OPC 01.c</td> <td>Mikania Eradication & control</td> <td>Dec 17</td> </tr> <tr> <td>3</td> <td>Lallang</td> <td>OPC 02.a</td> <td>Lallang Eradication & control</td> <td>Dec 17</td> </tr> <tr> <td rowspan="4">5</td> <td rowspan="4">Pest and disease</td> <td>OPC 04.b</td> <td>Rat control in oil palm</td> <td>Jan 18</td> </tr> <tr> <td>OPC 04.c</td> <td>Epiphyte Eradication</td> <td>Jan 18</td> </tr> <tr> <td>OPC 04.f</td> <td>Control of Rhinoceros Beetle</td> <td>Aug 18</td> </tr> <tr> <td>OPC 04.g</td> <td>Control of Leaf Eating Caterpillars</td> <td>Aug 18</td> </tr> </tbody> </table>	No.	Title	OPC no.	Index	Date	2	Weeding	OPC 01.b	Weed management in oil palm	Dec 17	OPC 01.c	Mikania Eradication & control	Dec 17	3	Lallang	OPC 02.a	Lallang Eradication & control	Dec 17	5	Pest and disease	OPC 04.b	Rat control in oil palm	Jan 18	OPC 04.c	Epiphyte Eradication	Jan 18	OPC 04.f	Control of Rhinoceros Beetle	Aug 18	OPC 04.g	Control of Leaf Eating Caterpillars	Aug 18	<p>Complied</p>
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2	Weeding	OPC 01.b	Weed management in oil palm	Dec 17																															
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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 pesticides used (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) is maintained by the estate and submitted to the Head Quarters on a monthly basis. Sampled the a.i./ha for chemicals used in 2022 as below: -</p>	<p>Complied</p>																																

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<u>Chamek Estate</u>		
Chemical	a.i	a.i/ ha
BM Cergas	Metsulfron Methyl	0.15
Ken-Up	Isopropylamine salt of glyphosate	0.39
Krush	Glyphosate -Potassium	0.06
Blocus Beta	Beta-Cyfluthrin	0.01
Garlon	Triclopyr Butoxyl	0.01
Alion	Indaziflam	7.58
H Cyper	Cypermethrin	0.37
<u>Kulai Young Estate</u>		
Chemical	a.i	a.i/ ha
Monex HC	MSMA, Duiroin	0.2455
Bentoweet	Polyglycol Ether	0.0494
Round up	Isopropylamine salt of glyphosate	0.0789
Garlon Mix	Triclopyr Butoxyl	0.1235
Ally 20 DF	Metsulfron Methyl	0.0357
Cypermethrin	Cypermethrin	0.1250

		<table border="1"> <tr> <td>Adonis</td> <td>Glufosinate Ammonium</td> <td>0.5870</td> </tr> <tr> <td>Dipel</td> <td>Bacillus</td> <td>0.7619</td> </tr> </table> <p>Telok Sengat Estate</p> <table border="1"> <tr> <td>Chemical</td> <td>a.i</td> <td>a.i/ ha</td> </tr> <tr> <td>Tikusan</td> <td>Brodifacum</td> <td>0.36</td> </tr> <tr> <td>Krush</td> <td>Glyphosate -Potassium</td> <td>1.26061</td> </tr> <tr> <td>Monster</td> <td>Glyphosate – Dimethyl Ammonium</td> <td>1.71906</td> </tr> <tr> <td>Ally 20 DF</td> <td>Metsulfron Methyl</td> <td>0.66519</td> </tr> </table>	Adonis	Glufosinate Ammonium	0.5870	Dipel	Bacillus	0.7619	Chemical	a.i	a.i/ ha	Tikusan	Brodifacum	0.36	Krush	Glyphosate -Potassium	1.26061	Monster	Glyphosate – Dimethyl Ammonium	1.71906	Ally 20 DF	Metsulfron Methyl	0.66519	
Adonis	Glufosinate Ammonium	0.5870																						
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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 stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan.</p> <p>Among the plan established as follows:</p> <ol style="list-style-type: none"> 1. Maintain beneficial plant, <i>Tunera Subulata</i> and <i>Cassia Cobanensis</i> along the field road 2. Purchase new barn owl 3. Fixing barn owl if needed <p>Census and record on total owl alive and monitoring barn condition (2 times per year).</p>	Complied																					
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>There is no evidence of prophylactic use of pesticides in the estates.</p>	Complied																					

7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>Addressed in the Boustead Plantations Berhad Sustainability Policy under section 1.6. Safe Handling of Pesticide stated the company commitment as follows:</p> <p>1.6.1. Advocating the safe and judicious use of chemical and complying with all current local legislative requirements and GAP.</p> <p>Reviewed in the Chemical Registers showed that only class III & IV chemicals were used at the estates. During the site visit to the chemical store, it was justified that there were only class II, III and IV chemicals being used. Paraquat was eliminated. In its place, alternatives such as Glyphosate was used instead. Monocrotophos was eliminated and in its place, Acephate is used.</p>	Complied
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>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. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers in the estate.</p> <p>The estates keep the training records as per criteria 3.7.2.</p>	Complied
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and estate's Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit, the store clerk was seen to unlock the padlock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage</p>	Complied

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		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 -	Empty pesticides container was identified as recycle waste. All empty pesticides containers were triple rinse, puncture and stored at designated stored before disposed to licensed contractors. The pesticides containers were disposed as Scheduled Waste under SW 409 or recycled waste base on availability of waste disposal contractors. Reviewed the disposal records as per criteria 7.3.2.	Complied
7.2.9	(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. - Critical (Major) compliance -	Aerial spraying is not a practice Telok Sengat Business Unit.	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	The estate conducted medical surveillance on annually basis as recommended in the CHRA report. <u>Chamek Estate</u> The estate conducted medical surveillance on annually basis as recommended in the CHRA report. Latest medical surveillance was conducted on 23/12/2022 by OHD with reg. no. HQ/18/DOC/00/00149. <u>Kulai Young Estate</u>	Complied

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		<p>The estate conducted medical surveillance on annually basis as recommended in the CHRA report. Latest medical surveillance was conducted on 27/09/2022 by OHD with reg. no. HQ/17/DOC/00/00005.</p> <p><u>Telok Sengat Estate</u></p> <p>The estate conducted medical surveillance on annually basis as recommended in the CHRA report. Latest medical surveillance was conducted on 03/10/2022 – 05/10/2022 by OHD with reg. no. HQ/17/DOC/00/00005.</p>											
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>Addressed in the Boustead Plantations Berhad Sustainability Policy under section 1.6. Safe Handling of Pesticide stated the company commitment as follows:</p> <p>1.6.2. Protect pregnant or breastfeeding women or others with medical restrictions from any work with pesticides in accordance with the Pesticides Act 1974 (Act 149) and Regulation 3 (c), Pesticides (Highly Poisonous Pesticides) Regulations 1996 (Amended 2004).</p>	Complied										
<p>Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>													
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Both mill and estates within Telok Sengat Business Unit documented and implemented waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics. Common industrial and general wastes generated by both mill and estates were managed as following:</p> <table border="1"> <thead> <tr> <th>#</th> <th>Source</th> <th>Waste</th> <th>Prevention</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>General store</td> <td>Petrol oil, lubricant</td> <td>Keep items in designated</td> <td>Establish recovery procedure -</td> </tr> </tbody> </table>	#	Source	Waste	Prevention	Action Plan	1	General store	Petrol oil, lubricant	Keep items in designated	Establish recovery procedure -	Complied
#	Source	Waste	Prevention	Action Plan									
1	General store	Petrol oil, lubricant	Keep items in designated	Establish recovery procedure -									

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			Chemical	area i.e., bund 110% of capacity	accidental spillage. Kit available
2	SW store	Scheduled waste		Comply to EQA requirement	Dispose as SW & maintain record.
3	Office	Domestic/ office waste		Implement recycling of waste	Continuous education on environmental issues and program.
		Toilet & kitchen		Provide bins	
4	Workshop	Used oil & grease		Display signboards & provide litter bins	
		Metal waste		Collect discarded materials for recycling	
		Oil drum/tank			
5	Labour line	Domestic waste		Display signboards & provide litter bins	Provide training on recycling
6	Labour line	Toilet & kitchen waste		Ensure no accidental spillage	Cease using facilities in event of non-functional

		<p>Specific mill and estate industrial wastes were managed through reuse and recycle activities as following:</p> <table border="1" data-bbox="1160 497 1890 970"> <thead> <tr> <th>#</th> <th>Area</th> <th>Waste</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Mill</td> <td>Boiler ash</td> <td>Application in estate field</td> </tr> <tr> <td>2</td> <td>Mill</td> <td>Fibre & shell</td> <td>Boiler fuel</td> </tr> <tr> <td>3</td> <td>Mill</td> <td>EFB</td> <td>Application in estate field</td> </tr> <tr> <td>4</td> <td>Mill</td> <td>Treated POME</td> <td>Discharge in estate furrows</td> </tr> <tr> <td>5</td> <td>Estate</td> <td>Empty fertilizer bag</td> <td>Inner liner disposed as SW, bag reuse in loose fruit collection</td> </tr> <tr> <td>6</td> <td>Estate</td> <td>Pruned fronds</td> <td>Inter-palm stackings in field</td> </tr> <tr> <td>7</td> <td>Estate</td> <td>Felled and chipped palm</td> <td>Inter-palm stackings in field</td> </tr> </tbody> </table>	#	Area	Waste	Action Plan	1	Mill	Boiler ash	Application in estate field	2	Mill	Fibre & shell	Boiler fuel	3	Mill	EFB	Application in estate field	4	Mill	Treated POME	Discharge in estate furrows	5	Estate	Empty fertilizer bag	Inner liner disposed as SW, bag reuse in loose fruit collection	6	Estate	Pruned fronds	Inter-palm stackings in field	7	Estate	Felled and chipped palm	Inter-palm stackings in field	
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7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Based on waste categories, disposal method demonstrated as per procedures and in compliance with legal requirements. The SOP for Scheduled Waste disposal is established as Boustead Plantations - Scheduled Waste Management; Date: June 2017. Scheduled Waste management records including inventor and disposal consignment maintained via "E-SWISS". SW in the mill was disposed via DOE registered disposal contractor as following:</p> <ul style="list-style-type: none"> - Telok Sengat POM: Modern Energy Sdn Bhd Pasir Gudang Johor; DOE licence # 004762 valid until 30/4/2024 - Telok Sengat Estate, Chamek Estate & Kulai Young Estate: 5E Resources Sdn Bhd DOE licence # 003892 valid until 30/4/2024 <p>Latest disposal recorded as following:</p>	OFI																																

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		<table border="1"> <thead> <tr> <th>Site</th> <th>Date</th> <th>SW types</th> </tr> </thead> <tbody> <tr> <td>Telok Sengat POM</td> <td>11/05/2023</td> <td>410, 409 & 305</td> </tr> <tr> <td>Telok Sengat Estate</td> <td>11/05/2023</td> <td>409</td> </tr> <tr> <td>Chamek Estate</td> <td>12/10/2022</td> <td>Extension until December 2023</td> </tr> <tr> <td>Kulai Young Estate</td> <td>09/03/2023</td> <td>410 & 409</td> </tr> </tbody> </table> <p>Domestic waste generated from workers quarters was disposed either in land fill for the or via local authority collection as following:</p> <table border="1"> <thead> <tr> <th>Site</th> <th>Disposal method</th> </tr> </thead> <tbody> <tr> <td>Telok Sengat POM</td> <td>Local council collection</td> </tr> <tr> <td>Telok Sengat Estate</td> <td>Local council collection</td> </tr> <tr> <td>Chamek Estate</td> <td>Landfill in field # PM 2001B</td> </tr> <tr> <td>Kulai Young Estate</td> <td>Local council collection</td> </tr> </tbody> </table> <p>Kulai Young Estate despatched to MDK landfill via services of ODEFSKI Enterprise centralized collection at PM 14A. However, detail documents on the disposal/landfill sites use by domestic wastes collected by domestic waste contractors in Kulai Young and Telok Sengat Estate could be demonstrated further. Hence, an OFI has been raised on the matter.</p>	Site	Date	SW types	Telok Sengat POM	11/05/2023	410, 409 & 305	Telok Sengat Estate	11/05/2023	409	Chamek Estate	12/10/2022	Extension until December 2023	Kulai Young Estate	09/03/2023	410 & 409	Site	Disposal method	Telok Sengat POM	Local council collection	Telok Sengat Estate	Local council collection	Chamek Estate	Landfill in field # PM 2001B	Kulai Young Estate	Local council collection	
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7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>The Group policy of "Zero open burning" is enforced since July 2008. The operating units adhered to the policy of "Zero open burning" for any waste disposal and land preparation for replanting. As a sample domestic waste generated from workers quarters in Telok Sengat POM was disposed externally via a Contractor M/S Fast Fact Management & Services Sdn. Bhd. Furthermore, field visit in Telok</p>	Complied																									

		Sengat Estate replanting area field PR20/21/22 confirmed that there is no fire or open burning being practiced for replanting activity.																
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.																		
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	<p>Boustead Plantations Berhad has established Standard Operating Procedure to manage soil fertility to optimise yield and minimise environmental impacts addressed in SOP as follows:</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Title</th> <th>OPC no.</th> <th>Index</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>4</td> <td>Manuring Application</td> <td>OPC 03.b</td> <td>Application of Fertilisers</td> <td>Sep 18</td> </tr> <tr> <td>13</td> <td>Planting Material</td> <td>OPC 52.d</td> <td>Manuring Program for oil palm nurseries</td> <td>Dec 17</td> </tr> </tbody> </table>	No.	Title	OPC no.	Index	Date	4	Manuring Application	OPC 03.b	Application of Fertilisers	Sep 18	13	Planting Material	OPC 52.d	Manuring Program for oil palm nurseries	Dec 17	Complied
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7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	<p>The appointed Consultant Agronomist, Applied Agricultural Resources Sdn. Bhd. conducted the soil sampling and leaf sampling on annually basis as base for fertiliser recommendation.</p> <p>Reviewed the soil sampling and leaf sampling reports and the Oil Palm Manuring Recommendations 2023 for all estates visited.</p>	Complied															
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance -	<p>As nutrient recycling strategy, the mill disposed by-products such as EFB and POME through field application at nearby sister estate. Reviewed the EFB application records for Telok Sengat Estate FY 2022 recorded at 34,526.11 tons.</p>	Complied															
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	<p>Fertiliser application was conducted as per recommendation appointed Agronomist from Applied Agricultural Resources Sdn. Bhd. Reviewed the Oil Palm Manuring Recommendations 2023 for all estates visited.</p> <p>The estates maintain the records of fertiliser application in the daily costing book. The fertiliser application was reported to the headquarters in the Monthly Progress Report – Managers Comment.</p>	Complied															

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		The reports were available at the estate’s office upon request. Reviewed the reports for the month of December 2022 and March 2023.	
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 identifying type of soils and contour including steep terrain available in all estates within Telok Sengat Business Unit. There is no peat soil or soil categorized as marginal or fragile soil in all estate visited.	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. - Minor compliance -	Based on the field visits at replanting fields in all estates, no replanting on steep slopes (above 25 degrees).	Complied
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	There is no new planting in all estates within Telok Sengat Business Unit.	Complied
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	Soil maps identifying type of soils and contour including steep terrain available in all estates within Telok Sengat Business Unit. There is no peat soil or soil categorized as marginal or fragile soil in all estate visited.	Complied
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	There is no peat soil or soil categorized as marginal or fragile soil in all estate visited.	Complied

7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil maps identifying type of soils and contour including steep terrain available with information of topographic, drainage and irrigation systems, roads and other infrastructure.	Complied
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	Neither there is peat soil nor new planting in all estates within Telok Sengat Business Unit. Hence, this is not applicable.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -	Neither there is peat soil nor new planting in all estates within Telok Sengat Business Unit. Hence, this is not applicable.	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	Neither there is peat soil nor new planting in all estates within Telok Sengat Business Unit. Hence, this is not applicable.	Not Applicable
7.7.4	(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -	Neither there is peat soil nor new planting in all estates within Telok Sengat Business Unit. Hence, this is not applicable.	Not Applicable
7.7.5	(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. 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	Neither there is peat soil nor new planting in all estates within Telok Sengat Business Unit. Hence, this is not applicable.	Not Applicable

	<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>	Neither there is peat soil nor new planting in all estates within Telok Sengat Business Unit. Hence, this is not applicable.	Not Applicable
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	Neither there is peat soil nor new planting in all estates within Telok Sengat Business Unit. Hence, this is not applicable.	Not Applicable
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p>	<p>The Water Management Plan has been established by both mill and estates. This is compiled on Group basis and amended to meet demands of specific issue in Operating Units. The Plan was reviewed annually (15/02/2023) for the 2023 plan. Included therein are the following documents which were sighted and verified. The Plan among others has included areas as following:</p> <ul style="list-style-type: none"> - Riparian buffer zone/water quality monitoring - Access of clean water to workers 	Non-compliance

	<p>- Minor compliance -</p>	<p>- Renewability of water source/Rainwater harvest</p> <table border="1" data-bbox="1153 432 1910 1067"> <thead> <tr> <th colspan="3">Contingency plan during water shortage</th> </tr> <tr> <th>Area/incident</th> <th>Action steps</th> <th>PIC</th> </tr> </thead> <tbody> <tr> <td data-bbox="1153 533 1346 799">Water shortage/ prolonged dry season</td> <td data-bbox="1346 533 1776 799">to obtain water from Mill catchment to train/educate staff/workers to conserve water to seek assistance from Group Estate - to obtain treated water supply from mill's WTP</td> <td data-bbox="1776 533 1910 799">Assistant Manager</td> </tr> <tr> <td data-bbox="1153 799 1346 1067">Severe water pollution/ contamination</td> <td data-bbox="1346 799 1776 1067">to obtain water from Mill catchment to train/educate staff/workers to conserve water to seek assistance from Group Estate - to obtain treated water supply from mill's WTP</td> <td data-bbox="1776 799 1910 1067">Assistant Manager</td> </tr> </tbody> </table> <table border="1" data-bbox="1153 1131 1910 1361"> <thead> <tr> <th colspan="4">Water reduction plan</th> </tr> <tr> <th>Issues/Areas</th> <th>Action Steps</th> <th>PIC</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td data-bbox="1153 1230 1346 1361">Rainwater collection</td> <td data-bbox="1346 1230 1704 1361">Large containers are to be placed at strategic locations to collect rainwater.</td> <td data-bbox="1704 1230 1783 1361">AM/ FC</td> <td data-bbox="1783 1230 1910 1361">Continuously</td> </tr> </tbody> </table>	Contingency plan during water shortage			Area/incident	Action steps	PIC	Water shortage/ prolonged dry season	to obtain water from Mill catchment to train/educate staff/workers to conserve water to seek assistance from Group Estate - to obtain treated water supply from mill's WTP	Assistant Manager	Severe water pollution/ contamination	to obtain water from Mill catchment to train/educate staff/workers to conserve water to seek assistance from Group Estate - to obtain treated water supply from mill's WTP	Assistant Manager	Water reduction plan				Issues/Areas	Action Steps	PIC	Status	Rainwater collection	Large containers are to be placed at strategic locations to collect rainwater.	AM/ FC	Continuously
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	The rainwater shall be recycled for washing heavy machinery										
7.8.2	<p data-bbox="255 863 1115 1129">(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle. - Critical (Major) compliance -</p>	<p data-bbox="1137 863 1930 1185">Telok Sengat Business Unit continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The Estate adopted the existing BPB policy to maintain the buffer by restricting agrochemical application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The practices are guided by a policy "Polisi Kemampuan BPB" signed by the CEO of Boustead Plantation Berhad dated 12/07/2021. The buffer zones established are as following:</p> <table border="1" data-bbox="1191 1193 1778 1391"> <thead> <tr> <th data-bbox="1191 1193 1460 1246">River width</th> <th data-bbox="1460 1193 1778 1246">Buffer zone width</th> </tr> </thead> <tbody> <tr> <td data-bbox="1191 1246 1460 1294">> 40 meters</td> <td data-bbox="1460 1246 1778 1294">50 meters</td> </tr> <tr> <td data-bbox="1191 1294 1460 1342">20 - 40 meters</td> <td data-bbox="1460 1294 1778 1342">40 meters</td> </tr> <tr> <td data-bbox="1191 1342 1460 1391">10 - 20 meters</td> <td data-bbox="1460 1342 1778 1391">20 meters</td> </tr> </tbody> </table>	River width	Buffer zone width	> 40 meters	50 meters	20 - 40 meters	40 meters	10 - 20 meters	20 meters	Complied
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5 - 10 meters	10 meters
< 5 meters	5 meters

The compliance will be further verified in the forthcoming site audit. Water samples are taken from the Estate for detection of any pollution arising from the mill and Estate activities. Water samples from the intake point are taken for phosphate and nitrate analysis for detection of fertilizer application effect to the water courses. Among others management plan taken:

- a) Regular inspection at buffer/HCV areas
- b) Monitor water from surrounding areas
- c) Track, measure and report all activities around river
- d) Train and educate workers.

Latest water sampling was conducted as following:

Estate	Frequency	Date	Location
Chamek	1x /year	07/10/2022	PM10A/06A/01A
Teluk Sengat	1x/2year	09/05/2023	PM 08A Sg. Temon
Kulai Young	1x /year	12/07/2022	WE /2022/07/374

Chamek Estate tested in UTCL Laboratory Mahamurni Plantations. Kulai Young Estate made annually analysis of drain water samples. Recent being dated 12/07/2022 at 4 points ref. # WE/2022/07/374. Report sighted and verified.

Kulai Young Estate had a tube well installed in 2015. The source being used for domestic used in the estate complex. The installation

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		<p>was made in view of cessation of water supply from the Gunung Pulai. Water measurement was made by M/s GWS Pump Solution Sdn. Bhd. annually recent being dated 15/07/2022. Static water level recorded at 1.10 meter. Down water level is shown at 26.60 meter. Open tube well pump off water level is recorded at 5.00 meter. Ministry of Health visits and collect samples for the tube well water dated 14/12/2022 with BOD < 2 other parameter in compliance.</p>																																														
<p>7.8.3</p>	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance -</p>	<p>POME was treated via anaerobic pond system prior to discharge as land application into estate field. Based on "<i>Jadual Pematuhan</i>" (license number and validity period 006380 valid from 01/07/2023 to 30/06/2023, the mill has a capacity of 40 mt/hr. Telok Sengat POM disposed effluent on water discharge Sg. Layau. Sighted quarterly report has been submitted to DOE by quarterly basis. Latest submission for to DOE on Mac 2023. Results of sampling for POME final discharge parameters analysed indicated compliance with required limits as following:</p> <table border="1" data-bbox="1167 906 1904 1351"> <thead> <tr> <th>Oct – Dec 22</th> <th>STD</th> <th>18/01/23</th> <th>09/02/23</th> <th>13/03/23</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>5-9</td> <td>8.70</td> <td>8,40</td> <td>8.20</td> </tr> <tr> <td>BOD mg/l</td> <td>20</td> <td>12.00</td> <td>17.00</td> <td>14.00</td> </tr> <tr> <td>COD mg/l</td> <td>-</td> <td>139.00</td> <td>189.00</td> <td>150.00</td> </tr> <tr> <td>A Nitrogen</td> <td>20</td> <td>18.00</td> <td>35.00</td> <td>9.00</td> </tr> <tr> <td>Total N</td> <td>200</td> <td>23.00</td> <td>46.00</td> <td>16.00</td> </tr> <tr> <td>Oil & Grease</td> <td>5</td> <td>2.00</td> <td>5.00</td> <td>6.00</td> </tr> <tr> <td>S Solids</td> <td>200</td> <td>40.00</td> <td>88.00</td> <td>49.00</td> </tr> <tr> <td>Total Soilds</td> <td>-</td> <td>968.00</td> <td>1198.00</td> <td>938.00</td> </tr> </tbody> </table>	Oct – Dec 22	STD	18/01/23	09/02/23	13/03/23	pH	5-9	8.70	8,40	8.20	BOD mg/l	20	12.00	17.00	14.00	COD mg/l	-	139.00	189.00	150.00	A Nitrogen	20	18.00	35.00	9.00	Total N	200	23.00	46.00	16.00	Oil & Grease	5	2.00	5.00	6.00	S Solids	200	40.00	88.00	49.00	Total Soilds	-	968.00	1198.00	938.00	<p>Complied</p>
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Total Soilds	-	968.00	1198.00	938.00																																												

7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>Mill water use per tonne of FFB is monitored and recorded with full year 2022 sample as following:</p> <table border="1" data-bbox="1211 448 1850 831"> <thead> <tr> <th>Month</th> <th>Water/FFB (m³/MT)</th> <th>Month</th> <th>Water/FFB (m³/MT)</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>1.17</td> <td>July</td> <td>1.15</td> </tr> <tr> <td>Feb</td> <td>1.20</td> <td>Aug</td> <td>1.19</td> </tr> <tr> <td>Mac</td> <td>1.28</td> <td>Sep</td> <td>1.32</td> </tr> <tr> <td>Apr</td> <td>1.47</td> <td>Oct</td> <td>1.21</td> </tr> <tr> <td>May</td> <td>1.19</td> <td>Nov</td> <td>1.23</td> </tr> <tr> <td>Jun</td> <td>1.25</td> <td>Dec</td> <td>1.21</td> </tr> </tbody> </table> <p>- Total FFB processed 2022: 147,461.20 mt</p> <p>- Total water usage 2022: 182,729 m³</p>	Month	Water/FFB (m ³ /MT)	Month	Water/FFB (m ³ /MT)	Jan	1.17	July	1.15	Feb	1.20	Aug	1.19	Mac	1.28	Sep	1.32	Apr	1.47	Oct	1.21	May	1.19	Nov	1.23	Jun	1.25	Dec	1.21	Complied
Month	Water/FFB (m ³ /MT)	Month	Water/FFB (m ³ /MT)																												
Jan	1.17	July	1.15																												
Feb	1.20	Aug	1.19																												
Mac	1.28	Sep	1.32																												
Apr	1.47	Oct	1.21																												
May	1.19	Nov	1.23																												
Jun	1.25	Dec	1.21																												
<p>Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised</p>																															
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>The monitoring is recorded in environment performance indicator- electricity generated by steam turbine tabulated for the financial year. It is calculated as electricity generated from turbine that produces power for the mill entire complex operation unit in kwh/mt FFB. A monthly record on energy consumption for both renewable and non-renewable sources were also maintained and documented. It is monitored to optimize use of renewable energy. The data is compiled for comparison and control for future improvement with aim of gradual reduction particularly diesel. Details of the data/records maintained by the mill were sighted. Variation of ratio in the analysis were explained and justified. Under the energy management plan 2023 the mill aimed for reduction plan such as following:</p>	Complied																												

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- Educate workers on fuel saving practice.
- Avoid leakages during vehicles maintenance.

The utilization of fossil fuel in 2022 was monitored with records ratio diesel L/FFB mt shown as following:

Month	Diesel /FFB	Month	Diesel /FFB
Jan	1.69	July	0.53
Feb	1.30	Aug	0.82
Mac	0.90	Sep	0.93
Apr	0.84	Oct	0.82
May	1.26	Nov	0.96
Jun	1.36	Dec	2.05

- Total FFB processed 2022: 147,461.20 mt
- Total diesel usage 2022: 164,360 L

The mill records and monitors the diesel utilization over the running hours of gen-set and other vehicles running. Performance variation in view of several factors i.e.

- Capacity of mill processing,
- Community size / no of gen-sets,
- No. of vehicles / age of machine.
- Weather interference / crop production volume
- Crop diversion to company's another mills due to breakdown.

Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	<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>Both the mill and the estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation. The management from both estate and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adversely impact the environment.</p> <p>All GHG emission parameters and source including fuel consumption and POME were reported in the Palm GHG Summary Report.</p>	Complied
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>Telok Sengat Business Unit calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1. The CU records NIL new development within the certified area. There is no new planting in There is no peat soil or soil categorized as marginal or fragile soil in all the estates visited nor there is no new planting within.</p>	Complied
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>Identification of significant pollutants and greenhouse gas (GHG) emissions has been done e.g. POME, diesel/fuel and fertilizer. Their usage has been recorded and documented at each of the operating units. Identification of significant pollutants and greenhouse gas (GHG) emissions has been done e.g. Land conversion, Emissions from Fertilizer, Emissions from peat, Fuel Consumption, and crop sequestration. As part of plans to reduce or minimise the pollutions, the usage has been recorded and documented at each of the operating units. Reduction also done via substitution from chemical pesticides to IPM, chemical to organic fertilizers and fossil fuel power generation to renewable energy power generation. Monitoring also conducted for the DOE license compliance as per</p>	Complied

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		<p>3rd Party Compliance Audit records; DOE Tracking # JAS.JHQ.600-3/1/13(2)/2022/02:</p> <ul style="list-style-type: none"> - Environmental Summary Findings Sheet; Audit Date: 26/5/2022 by Ir. Linda Tan; Environmental Auditor DOE Reg. # EA0065; CeSSWI Reg. # 3760; CePPOME Reg. #002777 - Environmental Compliance Audit Report; Audit Date: 20/12/2022; by Ir. Norul Syukiena Jaafar; Environmental Auditor DOE Reg. # EA0140; CISEC Reg. # MY-0696 	
<p>Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area</p>			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>Boustead Plantations Berhad has established the SOP for Area/Field: Replanting; Serial # EAI/2018/09-01; Activity: Felling & Clearing; Aspect: Soil Erosion; Environmental Load Item: Oil palm tree removal (temporary bare ground/top surface); Control: Low Cover Crop (LCC) upon replanting. Management also issued a memo i.e. Oil Palm Circular; O.P.C # 51c; Dated July 1999 and updated August 2018 that instructed no open burning for replanting. Visit to the replanting area during on-site assessment confirmed no open burning conducted.</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>Each operating unit within Telok Sengat Business Unit establishes its own Fire Fighting Team as part of its Emergency Response Team to attend to any emergency fire as well for fire prevention and control measures for the areas managed. Annual fire drill conducted with latest for sample in Kulai Young Estate on 03/12/2022.</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>Each operating unit within Telok Sengat Business Unit engages with adjacent stakeholders on fire prevention and control measures during external stakeholder meeting latest conducted as following:</p> <ul style="list-style-type: none"> - Chamek Estate on 05/08/2022. - Kulai Young on 22/06/2023. 	Complied

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		- Telok Sengat Estate and Telok Sengat POM on 09/06/2023.	
Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	Not applicable as no new development in all estates within Telok Sengat Business Unit.	Not Applicable
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>Information of HCVs, HCS forests and other conservation areas identified available as per report of High Conservation Value (HCV) Assessment Report (Multi-site) for Boustead Plantations Berhad covering Telok Sengat Estate, Kulai Young Estate, Chamek Estate, Eldred Estate and Bekoh Estate; July 2018.</p> <p>Assessment was conducted by Malaysian Environmental Consultants (MEC) on 2-11 April 2018 with public stakeholder consultations done on 21-22 May 2018.</p> <p>Results of assessment concluded that there were HCV presence within Telok Sengat certification unit as per following:</p> <ul style="list-style-type: none"> - HCV 1: Mark and label boundaries of HCV areas (Present in Telok Sengat &Chamek Estate) - HCV 2: Mark and label boundaries of HCV areas (Potentially present in TelokSengat Estate) - HCV 3: Mark and label boundaries of HCV areas (Present in Telok SengatEstate) - HCV 4: Mark and label boundaries of HCV areas (Present in all estates) 	Complied

		- HCV 6: Mark and install signage for each HCV site (Present in all estates) Notwithstanding, no new development in all estates within Telok Sengat Business Unit.	
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not applicable.	Not Applicable
7.12.4	(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). - Critical (Major) compliance -	No new development in all estates within Telok Sengat Business Unit. For existing operations, for identified HCV presence in individual estates as per report of High Conservation Value (HCV), the implementation of HCV management plan was established as objectives, targets and action plan which were in-line with recommendation from the HCV assessor. Based on the HCV report, few recommendations made by HCV assessor on management and monitoring.	Complied
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 rights of local communities have been identified in HCV areas within estates under Telok Sengat Business Unit.	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.	There was potential presence of RTE or high biodiversity value as identified by assessor in estates within Telok Sengat Business Unit. Based on the assessment report, there was an average of 82 species counted. There are 4 vulnerable (VU) species available or sighted are as following: - Pig-tailed macaque	Complied

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	- Minor compliance -	<ul style="list-style-type: none"> - Milky Stork - Otter – most likely the smooth otter - Javan Myna <p>Program to regularly educate the workforce about the status of RTE species available as per sample in Kulai Young Estate HCV 4 & HCV 6 Briefing by Field Supervisor: Nordin Rahman; Date: 9/2/2023.</p> <p>No issue of capture, harm, collect, trade, possess or kill these species since last audit that require disciplinary measure to be taken.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>There was potential presence of RTE or high biodiversity value as identified by assessor in estates within Telok Sengat Business Unit. Based on the assessment report, there was an average of 82 species counted. There are 4 vulnerable (VU) species available or sighted are as following:</p> <ul style="list-style-type: none"> - Pig-tailed Macaque - Milky Stork - Otter – most likely the smooth otter - Javan Myna <p>Monitoring conducted including regular patrol and sighting record by estate personnel. Based on monitoring, plan established including program to regularly educate the workforce about the status of RTE species as per sample in Kulai Young Estate HCV 4 & HCV 6 Briefing by Field Supervisor: Nordin Rahman; Date: 9/2/2023.</p>	Complied
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p>	<p>No land clearing without prior HCV assessment since November 2005 or without prior HCV-HCSA since 15 November 2018. Hence, no Remediation and Compensation Procedure (RaCP) applies.</p>	Complied

	- Critical (Major) compliance -		
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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2022** for Telok Sengat 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 **2022** for Telok Sengat Palm Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	3.93
PKO	3.93

Extraction	%
OER	20.41
KER	4.00

Production	t/yr
FFB Process	147,808.85
CPO Produced	30,171.58
PKO Produced	5,909.41

Land Use	Ha
OP Planted Area	7595.40
OP Planted on peat	-
Conservation (forested)	-
Conservation (non-forested)	-
Total	7595.40

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	67,568.07	0.53	-	-	4,224.23	0.21	71,792.31	0.74
CO ₂ Emission from fertilizer	3,920.39	0.03	-	-	34.15	-	3,954.55	0.03
NO ₂ Emission	-	-	-	-	-	-	-	-
Fuel Consumption	2,711.14	0.02	-	-	-	-	2,711.14	0.02
Peat Oxidation	442.87	-	-	-	69.79	-	512.67	-
Sink								
Crop Sequestration	-56,263.08	-0.44	-	-	-3,609.88	-0.18	-59,872.96	-0.62
Conservation Sequestration	-	-	-	-	-	-	-	-
Total	18,379.40	0.14	-	-	94,607.60	0.04	112,987.00	0.18

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	24,853.70	0.17
Fuel Consumption	599.87	-
Grid Electricity Utilization	3,350.65	-
Credit		
Export of Grid Electricity	-167.53	-
Sales of PKS	-	-
Sales of EFB	-	-
Total	28,636.68	0.17

Summary of Kernel Crusher Emission and Credit (if applicable)

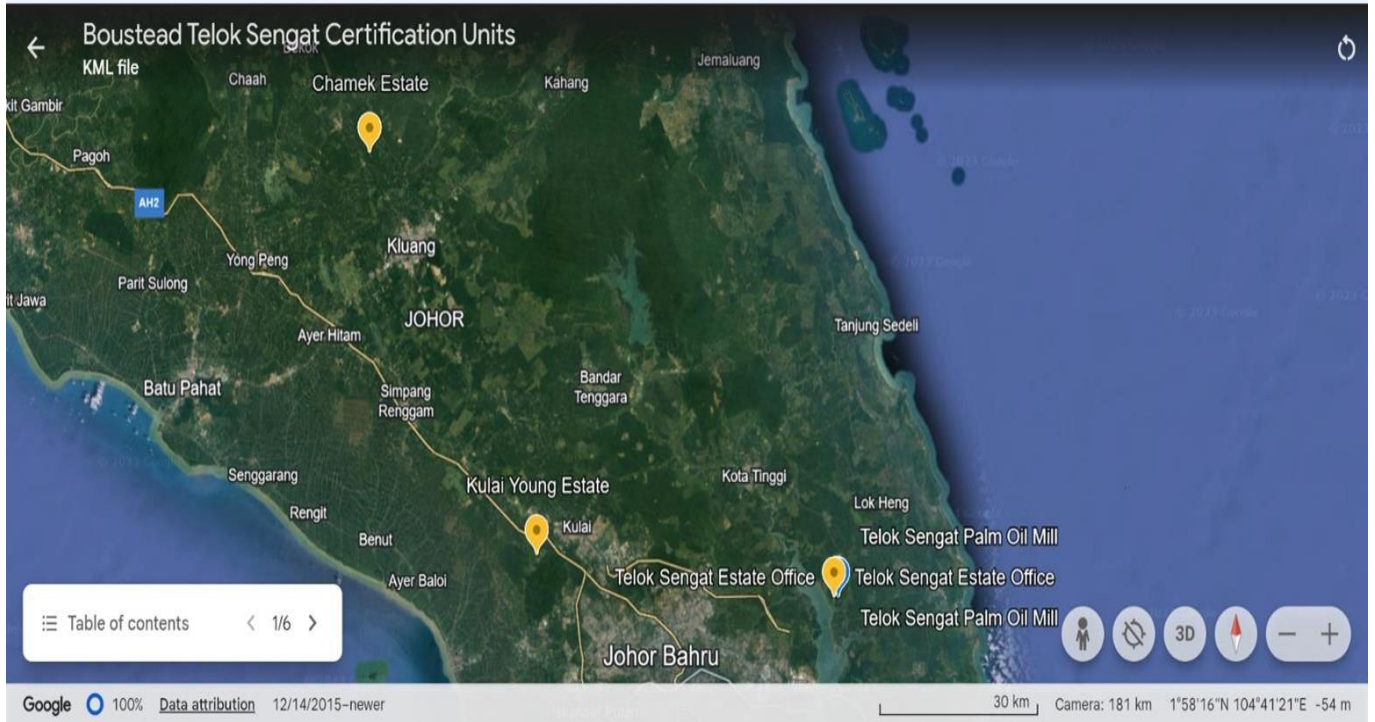
Emissions	tCO ₂ e
PK from own mill	-
PK from other source	-
Fuel Consumptions	-
Total Crusher emissions	-

*This mill has no kernel crusher operation.

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

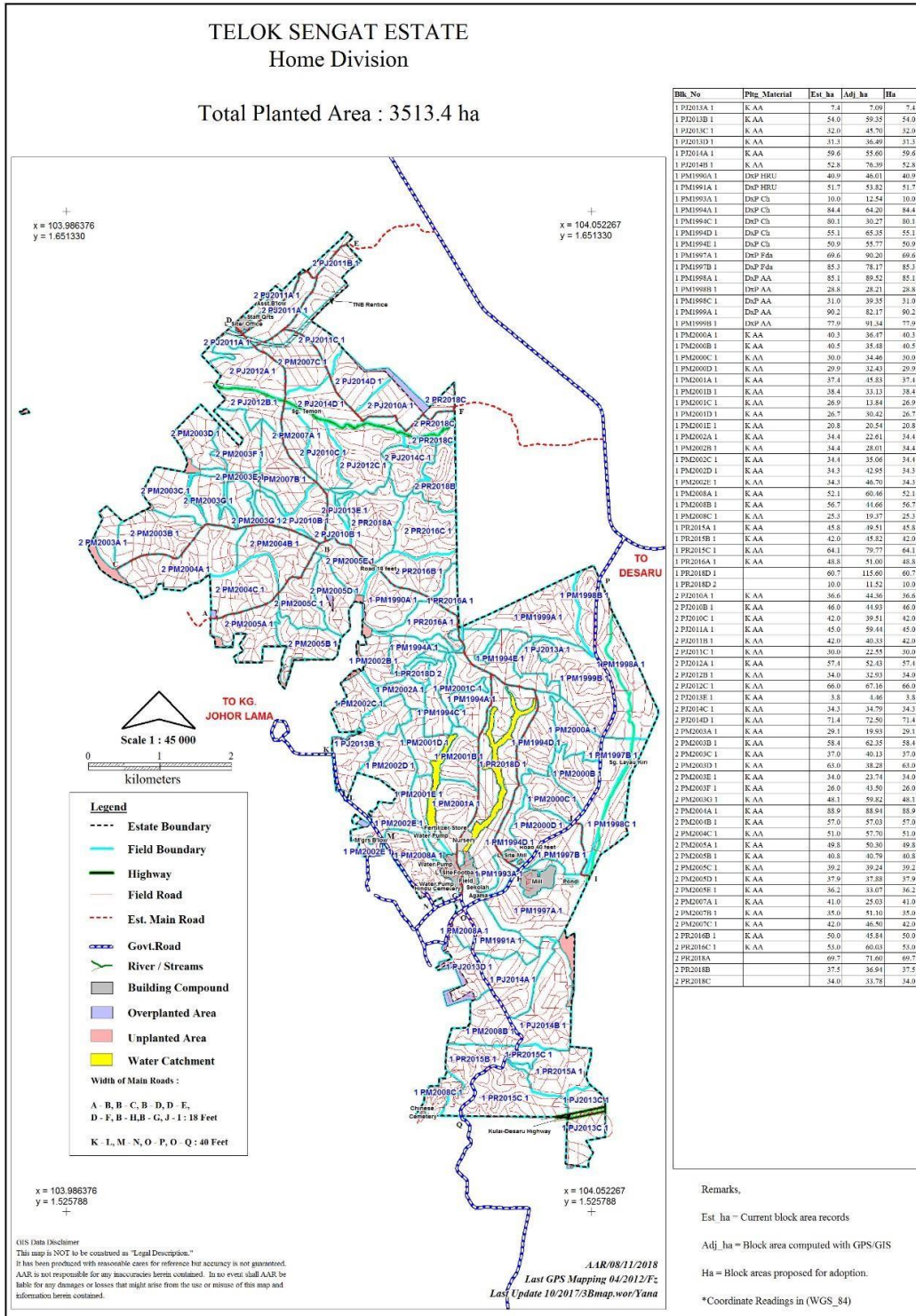
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	-
Divert to methane captured (flaring) (%)	27
Divert to methane captured (energy generation) (%)	73

Appendix C: Location Map of Certification Unit and Supply bases

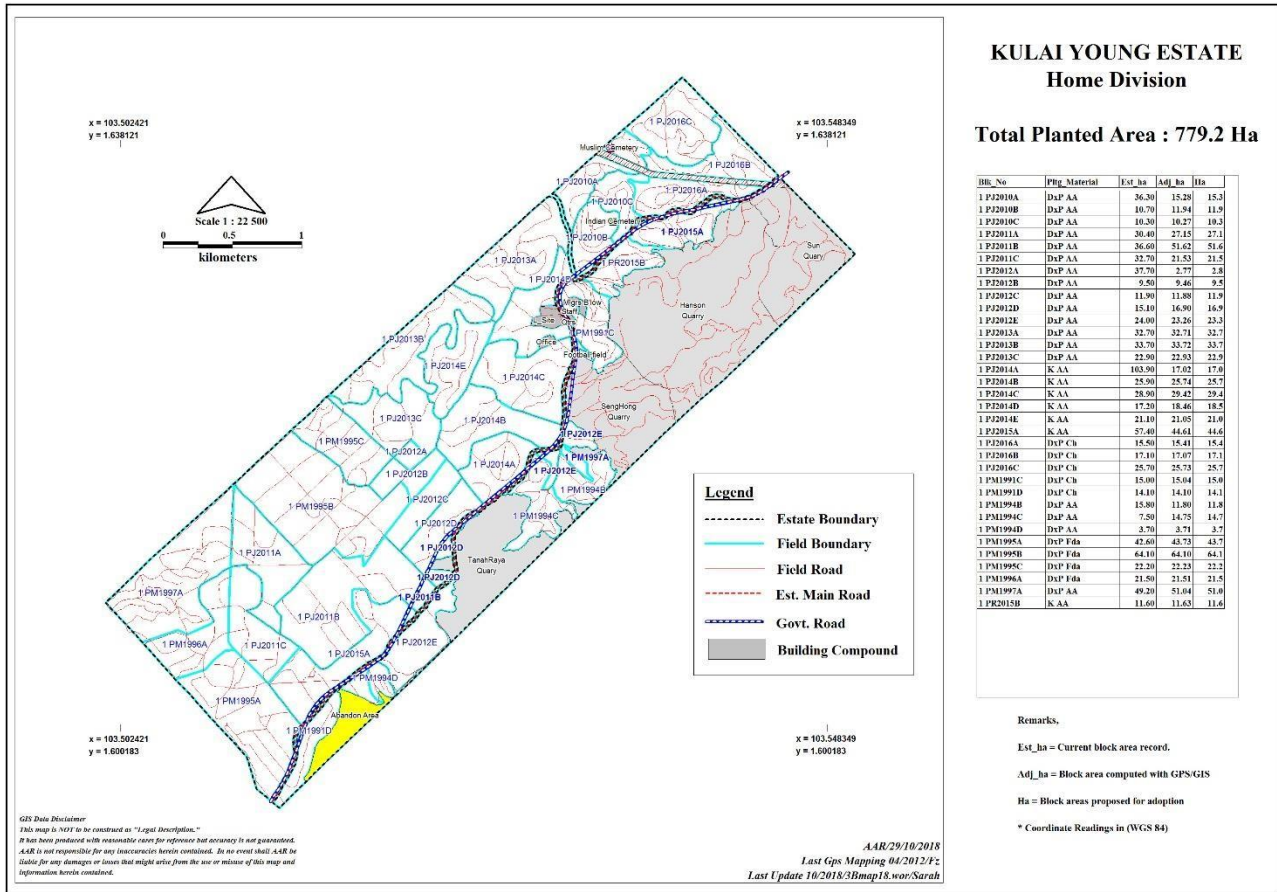


Appendix D: Estate Field Map

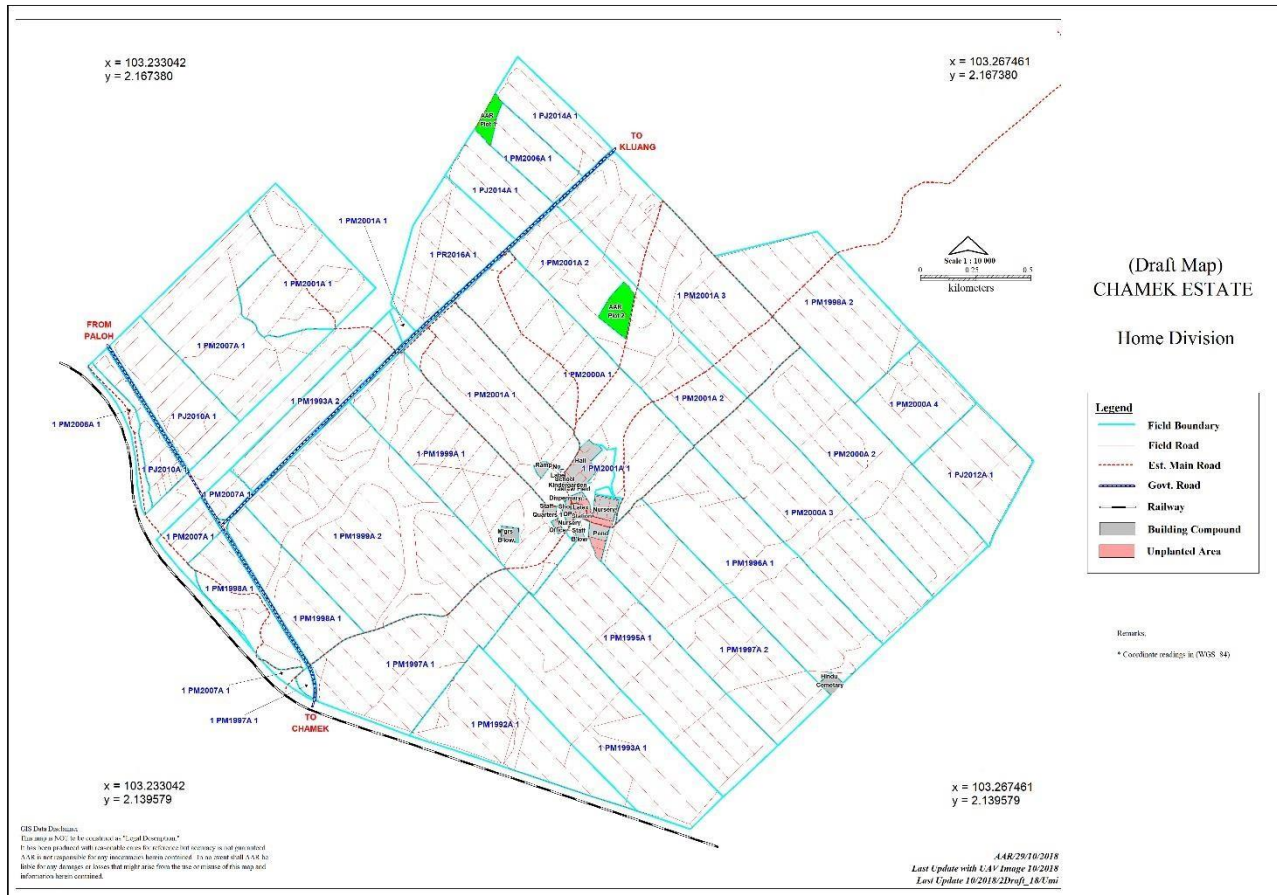
Telok Sengat Estate



Kulai Young Estate



Chamek Estate



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Appendix E: List of Smallholder Registered and/or sampled

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

Appendix F: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
ISS	Independent Smallholder Standard
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure