PF441 RSPO P&C Public Summary Report Revision 15 (Nov 2023)

### RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

Initial Assessment

□ Annual Surveillance Assessment (Choose an item.)

 $\boxtimes$  Recertification Assessment (RA 3)

□ Extension of Scope

## Client Company Name / Parent Company: Johor Corporation

Client company Address:

Level 16, Menara Komtar, Johor Bahru City Centre, 80000 Johor Bahru,

Johor Darul Takzim, Malaysia

Certification Unit:

### Johor Plantations Berhad - Tereh Palm Oil Mill

Location of Certification Unit:

Batu 26, Road Committee, Jalan Kampung Peta, Jalan Mersing, 86000 Kluang, Johor, Malaysia

> Date of Final Report: 11/01/2024

**TABLE of CONTENTS** 

## PF441 RSPO P&C Public Summary Report Revision 15 (Nov 2023)

Page No

#### 1. 2. 3. 4. Location(s) of Mill & Supply Bases ......4 5. Plantings & Cycle......5 1. 6. 7. 8. Summary of Non-Certified Tonnage of FFB (outside supplier - excluded from certificate)......7 9. Summary of Certified Tonnage (MT) (not applicable for ISS)......7 10. Summary of Actual Volume sold ......8 11. 12. 2.1 2.2 3.1 3.2 3.3 Details of Nonconformities......25 3.3.1 3.3.2 3.4 3.5 Appendix B: GHG Reporting Executive Summary......159

...making excellence a habit.<sup>™</sup> Page 2 of 171

### Section 1: Scope of the Assessment

1. Company Details						
Parent Company	Johor Corporation	Johor Corporation				
<b>RSPO Membership Number</b>	1-0080-09-000-00	Membershi	p Approval Date	15/06/2009		
Address	Level 16, Menara Komtar, Johor Bahru City Centre, 80000 Johor Bahru, Johor Darul Takzim, Malaysia					
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Johor Plantations Berhad - Tereh Palm Oil Mill					
Location / Address	Batu 26, Road Committee, Ja Johor, Malaysia	Ilan Kampung I	Peta, Jalan Mersing,	, 86000 Kluang,		
Website	www.johorplantations.com					
Management Representative	Wan Adlin Wan Mahmood         E-mail         wanadlin@johorplantations.com					
Telephone	07-8611611	Facsimile	07-8631084			

2. Certification Information					
Certificate Number	RSPO 613086	Certificat	te Start Date	23/01/2024	
Date of First Certification	23/01/2009	Certificat	te Expiry Date	22/01/2029	
Scope of Certification	Production of Sustainable Cru	ıde Palm Oi	l (CPO) and Palm Ker	nel (PK)	
Visit Objectives	To conduct a Recertification assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by the organisation's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan and where applicable to identify potential areas for improvement of the management system.				
Assessment Cycle	<ul> <li>Pre Assessment (Choose an item.)</li> <li>Initial Assessment</li> <li>Annual Surveillance Assessment (ASA Choose an item.)</li> <li>Recertification Assessment (RA 3)</li> <li>Scope Extension</li> </ul>				
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 ⊠ Malaysia National Interpretation 2019 of the RSPO P&C 2018				
Supply Chain Module	⊠ Identity Preserved; □ Mas	s Balance	Mill Capacity	60 mt/Hour	
ISH certification Phase	🗆 Eligibility 🗆 Milestone A 🛛	Milestone	e B 🖂 Not Applicable	2	

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

Is this a remote audit or	⊠ On-site audit (Option AI)	□ On-site audit (Option AII)	□ Remote audit (Option B)
on-site audit			

3. Other Certifications					
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date		
EU-ISCC-Cert-DE119- 60232024	ISCC EU	ASG Cert	10/08/2024		
ISCC-PLUS-Cert-DE119- 60232024	ISCC PLUS	ASG Cert	10/08/2024		
A158823	HALAL MS 1500:2019	JAKIM	31/08/2025		
MSPO 698004	MS 2530-4:2013	BSI Services (M) Sdn. Bhd.	01/04/2024		
MSPO 698005	MS 2530-3:2013	BSI Services (M) Sdn. Bhd.	01/04/2024		
BVC-MSPO/SC-0029	MSPO SCCS	Bureau Veritas	10/03/2025		

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

## RSPO P&C Public Summary Report Revision 15 (Nov 2023)

5. Description of Supply Base						
New Planting Development	⊠ No		□ Yes	□ Yes		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted	
Tereh Utara Estate	*2,821.82	78.73	*186.82	3,087.37	91.40	
Tereh Selatan Estate	2,534.13	54.76	118.33	2,707.22	93.61	
Sungai Tawing Estate	2,084.29	28.38	113.1	2,225.77	93.64	
Mutiara Estate	3,496.86	32.74	165.46	3,695.06	94.64	
Selai Estate	**3334.15	48.29	**152.63	3,535.07	94.32	
Rengam Estate	2,333.99	14.11	70.14	2,418.24	96.52	
Felda Paloh Estate	1,187.98	0.00	143.82	1,331.8	89.20	
Wawasan Estate	361.91	0.39	0.00	362.3	99.89	
Total	18,155.13	257.40	950.30	19,362.83	93.76	

Note:

\*Adjustment for Tereh Utara Estate resulting on decrease the area planted due to resurvey area for P22 on 23.5.2023

\*\*Adjustment for Selai Estate resulting increase the planted area due to resurvey area on 26.1.2023. there is no new planting was verified at that said area.

6. Plantings & Cycle						
Estate / Smallholders		Age (Years) - ha				Immature
	0 - 3	4 - 14	15 - 25	>25		
Tereh Utara Estate	616.47	0	2,205.35	0	2,205.35	616.47
Tereh Selatan Estate	433.57	272.19	1,828.37	0	2,100.56	433.57
Sungai Tawing Estate	231.82	625.09	1,227.38	0	1,852.47	231.82
Mutiara Estate	584.96	1,442.03	1,450.86	19.01	2,911.90	584.96
Selai Estate	55.81	2,257.9	1,020.44	0	3,278.34	55.81
Rengam Estate	169.44	1,172.46	992.09	0	2,164.55	169.44
Felda Paloh Estate	0	623.33	0	564.65	1,187.98	0
Wawasan Estate	0	0	140.76	221.15	361.91	0
Total (ha)	2,092.07	6,393.00	8,865.25	804.81	16,063.06	2,092.07
Note: Only Mature area is considered as production area						

## RSPO P&C Public Summary Report Revision 15 (Nov 2023)

7. Summary of Certified Tonnage of FFB (Own Certified Scope)						
Estate / Smallholders	Tonnage (MT) / year					
	Estimated last year (Jan 2023 – Dec	Act - Oct 2022)	Forecast (Jan 2024 – Dec			
	2023)	Previous license period (Oct 2022 – Dec 2022)	<i>Current license period</i> (Jan 2023 – Sept 2023)	2024)		
Tereh Utara Estate	51,553.00	14,063.20	27,660.21	47,630.00		
Tereh Selatan Estate	44,690.00	13,472.63 30,017.48		44,728.00		
Selai Estate	88,636.00	25,003.91	47,763.09	86,608.00		
Mutiara Estate	61,888.00	16,251.56	36,443.21	62,643.00		
Sg Tawing Estate	36,340.00	10,116.46	21,559.24	34,942.00		
Wawasan Estate	2,484.00	1,440.46	2,397.40	4,853.00		
Felda Paloh	6,484.00	1,225.20 4,502.430		13,030.00		
Rengam Estate	52,925.00	11,889.20	25,307.34	50,566.00		
Total 345,000.00 289,113.02 345,0						

8. Summary of Certified Tonnage of FFB (from other certified unit(s))						
Estate /	Tonnage (MT) / year					
Smallholders	Estimated last year (Jan 2023 – Dec		Actual (Oct 2022 – Sept 2023)			
	2023)	Previous license period (Oct 2022 – Dec 2022)	<i>Current license period</i> (Jan 2023 – Sept 2023)	2024)		
Sungai Papan Estate		464.14	4,322.76			
Siang Estate		938.58	1,336.37			
Basir Ismail Estate		1,179.02	2,383.02			
Labis Bahru Estate		1,202.30	-			
Sindora Estate		-	923.72			
REM Estate		-	985.46			
Pasir Logok Estate		-	425.50			
Tunjuk Laut Estate		-	1,266.92			
Eng Lee Heng			7,214.890			
Total		22,64	42.68	18858.64		



9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)					
Out growers /		Tonnage	(MT) / year		
smallholders	Estimated last year (Jan 2023 – Dec	Actual (Oct 2022 – Sept 2023)		Forecast (Jan 2024 – Dec	
	2023)	Previous license period (Oct 2022 – Dec 2022)	<i>Current license period</i> (Jan 2023 – Sept 2023)	2024)	
NA	-	-	-	-	
Total					

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	Oct 2022	33,427.33	0	33,427.33		
2	Nov 2022	33,083.84	0	33,083.84		
3	Dec 2022	30,735.49	0	30,735.49		
4	Jan 2023	19,928.01	0	19,928.01		
5	Feb 2023	15,987.74	0	15,987.74		
6	Mar 2023	15,062.56	0	15,062.56		
7	Apr 2023	17,445.32	0	17,445.32		
8	May 2023	23,208.22	0	23,208.22		
9	June 2023	26,612.18	0	26,612.18		
10	July 2023	29,615.81	0	29,615.81		
11	Aug 2023	33,569.68	0	33,569.68		
12	Sept 2023	33,079.52	0	33,079.52		
	TOTAL	311,755.70	0	311,755.70		

10. Summary of Certified Tonnage (MT) (not applicable for ISS)					
Estimated last year (Jan 2023 – Dec 2023)	Actual (Oct 2022 – Sept 2023)			Forecast (Jan 2024 – Dec 2024)	
	<i>Previous licens</i> (Oct 2022 – De	,	<i>Current license period</i> (Jan 2023 – Sept 2023)		
FFB	FFB			FFB	
200 FFC 00 mb	97,246.66 mt		214,509.04 mt	245 000 00 mt	
389,556.00 mt	TOTAL		311,755.70 mt	- 345,000.00 mt	
CPO (OER: 21.50%)	CPO (OER: 20.25%)			CPO (OER: 21.20%)	
81,464.00 mt	19,781.3	1 mt	43,359.11 mt	73,140.00 mt	

...making excellence a habit." Page 7 of 171

	TOTAL	63,140.42 mt		
PK (KER: 5.43%)		PK (KER	: 6.49%)	PK (KER: 5.41%)
20 224 00 mt	5,769.72	5,769.72 mt 14,454.33 mt		10.CCE 00 mb
20,334.00 mt	TOTAL	20,224.05 mt		18,665.00 mt

10A. M	10A. Monthly Records of Certified CPO & PK since the last audit							
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)					
1	Oct 2022	6,858.22	2,010.83					
2	Nov 2022	6,622.04	1,963.67					
3	Dec 2022	6,301.05	1,795.22					
4	Jan 2023	4,067.29	1,188.47					
5	Feb 2023	3,099.79	858.63					
6	Mar 2023	2,997.74	839.10					
7	Apr 2023	3,634.47	2,886.20					
8	May 2023	4,810.35	990.99					
9	June 2023	5,420.82	1,221.63					
10	July 2023	6,133.35	1,317.76					
11	Aug 2023	6,485.86	3,530.38					
12	Sept 2023	6,709.44	1,621.17					
	TOTAL	63,140.42	20,224.05					

11. Summa	11. Summary of Actual Volume sold										
Current License period (Jan 2023 – Sept 2023)											
	RSPO Certified	Other Sche	mes Certified	Conventional	Total						
	RSPO Certified	ISCC	Others	Conventional	TOLAI						
CPO (MT)	43,618.77	0	0	0	43,618.77						
PK (MT)	11,698.81	0	0	0	11,698.81						
Credits	0	0	0	0	0						
<b>Previous Lic</b>	ense period (Oct 2022 -	- Dec 2022)									
CPO (MT)	19,120.31	0	0	0	19,120.31						
PK (MT)	5,479.04	0	0	0	5,479.04						
Credits	0	0	0	0	0						
Note.											

...making excellence a habit." Page 8 of 171

11A. Re	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	Buyer A to F	TR-XXXXXXXXX-XXXX	62,739.08	-						
2	Buyer G to K	TR-XXXXXXXXX-XXXX	-	17,177.85						
TOTAL 62,739.08 17,177.85										
Note: D	ata is consolidated, and each transacti	on were verified against Palm	Trace							

Note: Data is consolidated, and each transaction were verified against PalmTrace

11B. Re	11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)								
No.	Buyers Name	Buyers NameScheme NameCertified CPO Sold (MT)Certified PK Sold (MT)							
-	-	-	-	-					
		TOTAL	-	-					

11C. Re	11C. Records of CPO & PK Sold as conventional since the last audit (if any)							
No.	No.Buyers NameCPO Sold (MT)PK Sold (MT)							
-	-	-	-					
	TOTAL	-	-					

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

12. Independent Smallholders Certified Tonnage (MT) / Volume										
	Estimated last year (Jan 2023 – Dec 2023)			Actual (Oct 2022 – Sept 2023)			Forecast (Jan 2024 – Dec 2024)			
Phase	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B	
PlidSe	40%	<b>70%</b>	100%	40%	<b>70</b> %	100%	40%	<b>70</b> %	100%	
FFB			-			-			-	
IS-CSPO	-	-		-	-		-	-		
IS-CSPKO	-	-		-	-		-	-		
IS-CSPKE	-	-		-	-		-	-		
CSPK	-	-		-	-		-	-		

...making excellence a habit." Page 9 of 171

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

**Note:** 1 mt = 1 credit

13. Inde	13. Independent Smallholders Actual Sold Tonnage / Volume											
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE					
Current Li	Current License period											
Credits				-	-	-	-					
Physical	-	-	-									
Previous I	License period (	(-)										
Credits				-	-	-	-					
Physical	-	-	-									

13A.	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)	<b>PKO Sold</b>	Certified PKE Sold (MT/credit)				
-	-	-	-	-	-	-	-				
-	-	-	-	-	-	-	-				
		TOTAL	-	-	-	-	-				
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. Tel +60 (3) 9212 9638; Fax +60 (3) 9212 9639 Representative: Dr. Chaiyaporn Seekao (<u>Chaiyaporn.Seekao@bsigroup.com</u>) Website: <u>www.bsigroup.com</u>

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 **29/10/2023 – 02/11/2023.** The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on **20/09/2023.** <u>https://rspo.org/wp-content/uploads/RSPO-Public-Notification\_Berhad-Tereh-Palm-Oil-Mill\_English\_rev.pdf</u>

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

The Critical NC close out on-site assessment was conducted on **18/12/2023**. The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO P&C 2018 for Production of Sustainable Palm Oil 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 Johor Plantations Berhad - Tereh Palm Oil Mill and Supply Bases 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.

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

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

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

Assessment Program										
Name (Mill / Supply Base)	Year 1 (Recertification 3)	Year 2 (ASA3_1)	Year 3 (ASA3_2)	Year 4 (ASA3_3)	Year 5 (ASA3_4)					
Tereh Palm Oil Mill	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$					
Tereh Utara Estate	-	$\checkmark$	-	$\checkmark$	-					
Tereh Selatan Estate	$\checkmark$		$\checkmark$		$\checkmark$					
Selai Estate	$\checkmark$	-	$\checkmark$	-	$\checkmark$					
Mutiara Estate	-	$\checkmark$	-	$\checkmark$	-					
Sg Tawing Estate	$\checkmark$	-	$\checkmark$	-	$\checkmark$					
Wawasan Estate	-	$\checkmark$	-	$\checkmark$	-					
Felda Paloh Estate	-	$\checkmark$	-	$\checkmark$	-					
Rengam Estate	$\checkmark$	-	$\checkmark$	-	$\checkmark$					

Tentative Date of Next Visit: October 28, 2024 - November 1, 2024

#### **Total Number of Mandays: 15 Mandays**

#### 2.2 BSI Assessment Team

Name	Role	Competency
Nor Halis Abu Zar (NHA)	Team Leader	<b>Education:</b> Holds a Bachelor of Science in Plantation Technology and Management, University Technology Mara
		Work Experience:
		He has 6 years' experience in Oil Palm Estate Management with Johor Plantations Berhad Sdn. Bhd. The last position held was Assistant Manager. His experience includes the day-to-day estate operations and ensured the implementation of RSPO, ISCC and MSPO certification. He is a qualified Lead Auditor for MSPO and has accumulated more than 400 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.

PF441

## RSPO P&C Public Summary Report Revision 15 (Nov 2023)

		Training attended:
		He has completed ISO IMS 9001 and 14001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor Course (P&C and SCC), Refresher RSPO P&C Lead Auditor Course, ISO 45001 Lead Auditor Course, ISO 9001:2015 Lead Auditor Course, MSPO SCCS Auditor Course and SMETA Requirement Training.
		Language proficiency:
		Bahasa Malaysia and English.
		Aspect covered in this audit:
		$oxed{intermattice}$ Good Agriculture Practice $oxed{intermattice}$ Health and Safety $oxed{intermattice}$ Supply chain requirements
		□ Social □ Environmental ⊠ Market Communication and daim requirements
		$\hfill\square$ ISH context (ICS, internal audit, policy, business planning and trading system)
Mohd Razaleigh	Team Member	Education:
Mohamad (MRM)		Holds a Bachelor Degree in Plantation Management and Agrotechnology, University Technology Mara (UiTM).
		Work Experience:
		He has 5 years' experience in Oil Palm Estate Management with Tradewinds Plantation Berhad. The last position held was Senior Assistant Manager. He has more than 4 years of experience in Third Party Certification Audit with Control Union (M) Sdn Bhd for RSPO P&C, MSPO P&C and GLOBALG.A.P. IFA Fruits and Vegetables. Qualified as RSPO Lead Auditor and approved to conduct Environmental and Social elements.
		Training attended:
		He has completed ISO 9001:2015 Lead Auditor Course, ISO14001:2015 Lead Auditor Course, ISO45001:2018 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed MSPO P&C Lead Auditor Course, Social Accountability SA8000 Auditor Course, RSPO Independent Smallholder (IHS) Auditor Training and Endorsed RSPO P&C and SCCS Refresher Training.
		Language proficiency:
		Bahasa Malaysia and English.
		Aspect covered in this audit:
		$oxed{intermatting}$ Good Agriculture Practice $\Box$ Health and Safety $\Box$ Supply chain requirements
		$\boxtimes$ Social $\square$ Environmental $\square$ Market Communication and daim requirements
		$\hfill\square$ ISH context (ICS, internal audit, policy, business planning and trading system)
Ahmad Rufi Bin	Team Member	Education:
Abu Talib Khan (ARK)		Bachelor Degree In Mechanical Engineering from Universiti Teknologi MARA Shah Alam, graduated in 2015
		Work Experience:
		He started his career as Assistant Mill Manager, managing the day-to-day mill operations. In his five years' experience, he has experience handling the certification of ISO 9001, OHSAS 18001, ISO 14001 as well as Malaysia Sustainable Palm Oil (MSPO). He is a qualified Lead Auditor for MS 2530:2013

PF441

## RSPO P&C Public Summary Report Revision 15 (Nov 2023)

		<ul> <li>and has accumulated more than 300 audit days throughout his current career as the auditor for multiple disciplines covering all over Malaysia</li> <li>Training attended:</li> <li>He has completed CQI – IRCA approved ISO 9001, ISO 14001 and ISO 45001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor and RSPO SCC Auditor course.</li> <li>Language proficiency:</li> <li>Bahasa Malaysia and English.</li> <li>Aspect covered in this audit:</li> <li>⊠ Good Agriculture Practice □ Health and Safety □ Supply chain requirements</li> <li>□ Social ⊠ Environmental □ Market Communication and daim requirements</li> <li>□ ISH context (ICS, internal audit, policy, business planning and trading automatication)</li> </ul>
Dr. Suhaili Sahari	Peer Reviewer	system) Education:
		Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato' Mohd Muda.
		Work Experience:
		Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.
		Training attended:
		1. ISO 9001:2015 Lead Auditor and Internal Auditor
		2. ASI reviewer training
		3. Safety and Health
		4. ISO 14001:2015 Standard
		5. RSPO Standards: RSPO P&C 2018 MY-NI 2019 6. MSPO Standards: MS 2530 : 2013 part 1, 2, 3 and 4
		<ul><li>6. MSPO Standards : MS 2530 : 2013 part 1, 2, 3 and 4</li><li>7. Problem Solving Technique : 8 D, ICC, QCC, Systematic PS</li></ul>
		8. HACCP MS 1480:2019
		9. GAP Standard : Global GAP, Euro GAP



#### **Accompanying Persons:**

Name	Role
-	-

#### 2.3 Assessment Plan

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

Date	Time	Subjects	NHA	MRM	ARK
Saturday 28/10/2023	-	Audit Team Travel from Kuala Lumpur to Kluang	$\checkmark$	$\checkmark$	$\checkmark$
Sunday, 29/10/2023 Tereh Selatan Estate	08.30 – 09.00	<ul> <li>Opening Meeting:</li> <li>Opening Presentation by Audit team leader.</li> <li>Confirmation of assessment scope and finalize Audit plan</li> </ul>	$\checkmark$	V	$\checkmark$
	09.00 – 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	$\checkmark$	V	V
	12.30 – 13.30 –	Lunch/ Break	$\checkmark$	$\checkmark$	$\checkmark$
	13.30 – 16.30	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	$\checkmark$	V	V
	16.30 – 17.00	Interim Closing briefing.	$\checkmark$	$\checkmark$	$\checkmark$

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

Date	Time		Subjects	NHA	MRM	ARK
Monday, 30/10/2023 Rengam Estate	09.00 12.30 10.00 12.00	-	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	V	V	V
	12.30 13.30	_	Lunch/ Break	$\checkmark$	$\checkmark$	$\checkmark$
	13.30 16.30	_	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	V	$\checkmark$	V
	16.30 17.00	-	Interim Closing briefing.	$\checkmark$	$\checkmark$	$\checkmark$
Tuesday 31/10/2023 Tereh Palm Oil Mill	09.00 12.30	-	Lab, weighbridge, and palm product storage area. Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation. RSPO SCC general requirements, internal audit, management review, sales and purchasing	$\checkmark$	$\checkmark$	$\checkmark$
	12.20		documents, mass balance accounting and other relevant documents and records.		/	/
	12.30 13.30	-	Lunch/ Break	V	V	V
	13.30 16.30	_	Lab, weighbridge, and palm product storage area. Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation.	$\checkmark$	$\checkmark$	V
	16.30 17.00	-	Interim Closing briefing.	$\checkmark$	$\checkmark$	$\checkmark$

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

Date	Time		Subjects	NHA	MRM	ARK
Wednesday 01/11/2023 Selai Estate	09.00 12.30	-	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	V	V	V
	12.30 13.30	-	Lunch/ Break	$\checkmark$	$\checkmark$	$\checkmark$
	13.30 16.30	_	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	V	V	V
	16.30 17.00	-	Interim Closing briefing.	$\checkmark$	$\checkmark$	$\checkmark$
Thursday 02/11/2023 Sungai Tawing Estate	09.00 12.30	-	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	V	V	V
	12.30 13.30	-	Lunch/ Break	$\checkmark$	$\checkmark$	$\checkmark$
	13.30 16.00	_	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	$\checkmark$	V	V
	16.00 17.00	-	Audit Team Discussion and Closing Meeting	$\checkmark$	$\checkmark$	$\checkmark$
Friday 03/11/2023	-		Audit Team Travel back to Kuala Lumpur	$\checkmark$	$\checkmark$	$\checkmark$

## PF441 RSPO P&C Public Summary Report Revision 15 (Nov 2023)

#### Major NC Close Out

Date	Time	Subjects	NHA
Sunday	_	Auditor Travelling	$\checkmark$
17/12/2023			
Manday	09.00 -	Opening Meeting:	
Monday	09.15	Opening Presentation by Audit team leader.	$\checkmark$
18/12/2023		Confirmation of assessment scope and finalize Audit plan	
09.00 – 12.00 Tereh Selatan Estate	09.15 – 12.00	<ul> <li>Verification on previous Major NC: 2413044-202310-M1</li> <li>Site observation, workers interview (individual and group session) if necessary</li> <li>Document review – implemented evidence</li> </ul>	√
	12.00 – 12.30	Closing Meeting	V
	12.30	Auditor travelling	√

### **Section 3: Assessment Findings**

### 3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Yes, the plan includes all current subsidiaries, estates and mills that is under management control.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	Yes, all the estates and mills certified within 5 years after obtaining RSPO membership. However the Indonesian units, PT RAJ & PT TPR had disposed on 06/07/2023. Completed on August 2023. Refer <u>https://kulim.com.my/media-</u> <u>release/announcement/disposal-of-kulims- oil-palm-plantation-business-in-indonesia/</u>	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. There have not been any new acquisitions.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	No. There have not been any deviations from the maximum periods requires approval by the RSPO Secretariat. Indonesian units, PT RAJ & PT TPR had disposed on 06/07/2023. Completed on August 2023. Refer <u>https://kulim.com.my/media-</u> <u>release/announcement/disposal-of-kulims- oil-palm-plantation-business-in-indonesia/</u>	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?	No. There has no any changes to the time- bound plan since the last audit.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	No. There is no isolated lapse in Time Bound Plan.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised	There is no any fundamental failure to proceed with implementation of the plan.	Complied
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance	Indonesian units, PT RAJ & PT TPR had disposed on 06/07/2023. Completed on August 2023. Refer	Not Applicable

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

with RSPO P&C criterion 7.12.	https://kulim.com.my/media- release/announcement/disposal-of-kulims- oil-palm-plantation-business-in-indonesia/ Therefore this indicator was not applicable.	
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	Indonesian units, PT RAJ & PT TPR had disposed on 06/07/2023. Completed on August 2023. Therefore, this requirement was not applicable.	Not Applicable
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. <i>Note:</i> <i>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. The progress on the Liabilities shall be verified and reported.</i> <i>Please refer to BSI-RSPO Secretariat approval.</i>	Indonesian units, PT RAJ & PT TPR had disposed on 06/07/2023. Completed on August 2023. Refer Agreement between both parties dated 06/07/2023. Therefore, this requirement was not applicable.	Not Applicable
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	Indonesian units, PT RAJ & PT TPR had disposed on 06/07/2023. Completed on August 2023. Refer Agreement between both parties dated 06/07/2023. Therefore, this requirement was not applicable.	Not Applicable
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Indonesian units, PT RAJ & PT TPR had disposed on 06/07/2023. Completed on August 2023. Therefore, this requirement was not applicable.	Not Applicable
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.	Indonesian units, PT RAJ & PT TPR had disposed on 06/07/2023. Completed on August 2023. Therefore, this requirement was not applicable.	Not Applicable
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?	Indonesian units, PT RAJ & PT TPR had disposed on 06/07/2023. Completed on August 2023. Therefore, this requirement was not applicable.	Not Applicable
Have there been any stakeholder (including NGO) consultation conducted?	Indonesian units, PT RAJ & PT TPR had disposed on 06/07/2023. Completed on August 2023. Therefore, this requirement was not applicable.	Not Applicable

### 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 or scheme outgrowers under the certification unit.	Not Applicable						
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.								

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

### **Approved Time Bound Plan**

							Date of			<b>REVISION OF THE TBP</b> Only applicable when revision is made)			
Name of the Unit of Certificatio n (UoC)	Country	Name of the Mills and Supply Bases	Total Managed Area (Ha)	Certificatio n Status (Certified / Not certified)	Plan Year for Certificat ion	Actual Certific ation Year	Last TBP Verified and Approved by CB	Any revision from the last approved TBP? (Yes / No)	e Proposed Year for ed Certificatio n	Justification of changes for each UoC	Date of approval from RSPO		
Sedenak Palm Oil Mill	Malaysia	Sedenak Estate	2808	Certified	Nil	2009	20-Apr-22	Yes	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil		
		Kuala Kabong Estate	1718	Certified	Nil	2009	20-Apr-22	Yes	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil		
Sindora Palm Oil Mill	Malaysia	Sindora Estate	3,919.06	Certified	Nil	2009	20-Apr-22	Yes	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil		
		Basir Ismail Estate	3594.4	Certified	Nil	2009	20-Apr-22	Yes	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil		
		<i>REM Estate</i>	2898.9	Certified	Nil	2009	20-Apr-22	Yes	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil		
		Sungai Papan Estate	2,995.85	Certified	Nil	2009	20-Apr-22	Yes	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil		
Tereh Palm Oil Mill	Malaysia	<i>Tereh Utara Estate</i>	3087.4	Certified	Nil	2009	20-Apr-22	Yes	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil		
		<i>Tereh Selatan Estate</i>	2707.2	Certified	Nil	2009	20-Apr-22	Yes	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil		

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Page 22 of 171

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Page 23 of 171

Nov 20	Revision 15 (										
Nil	We completed the disposal of our Indonesia operation in August 2023	Nil	Yes	20-Apr-22	2009	Nil	Certified	3535.1	Selai Estate		
Nil	We completed the disposal of our Indonesia operation in August 2023	Nil	Yes	20-Apr-22	2009	Nil	Certified	3695.1	Mutiara Estate		
Nil	We completed the disposal of our Indonesia operation in August 2023	Nil	Yes	20-Apr-22	2009	Nil	Certified	2225.8	Sungai Tawing Estate		
Nil	We completed the disposal of our Indonesia operation in August 2023	Nil	Yes	20-Apr-22	2009	Nil	Certified	362.30	Wawasan Estate		
Nil	We completed the disposal of our Indonesia operation in August 2023	Nil	Yes	20-Apr-22	2009	Nil	Certified	1331.8	Felda Paloh Estate		
Nil	We completed the disposal of our Indonesia operation in August 2023	Nil	Yes	20-Apr-22	2009	Nil	Certified	2418.2	Rengam Estate		
Nil	We completed the disposal of our Indonesia operation in August 2023	Nil	Yes	20-Apr-22	2009	Nil	Certified	3701.9	Palong Estate	Malaysia	Palong Palm Oil Mill
Nil	We completed the disposal of our Indonesia operation in August 2023	Nil	Yes	20-Apr-22	2009	Nil	Certified	2898.3	Mungka Estate		
Nil	We completed the disposal of our Indonesia operation in August 2023	Nil	Yes	20-Apr-22	2009	Nil	Certified	1616.3	UMAC Estate		
Nil	We completed the disposal of our Indonesia operation in August 2023	Nil	Yes	20-Apr-22	2009	Nil	Certified	2108.2	<i>Labis Bahru Estate</i>		
Nil	We completed the disposal of our Indonesia operation in August 2023	Nil	Yes	20-Apr-22	2009	Nil	Certified	4013.6	Pasir Panjang Estate	Malaysia	Pasir Panjang Palm Oil Mill
Nil	We completed the disposal of our Indonesia operation in August 2023	Nil	Yes	20-Apr-22	2009	Nil	Certified	2867.8	Tunjuk Laut Estate		
Nil	We completed the disposal of our Indonesia operation in August 2023	Nil	Yes	20-Apr-22	2009	Nil	Certified	3443.1	Siang Estate		

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**RSPO P&C Public Summary Report** 

## Revision 15 (Nov 2023)

		Bukit Kelompok Estate	2613.8	Certified	Nil	2009	20-Apr-22	Yes	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
		Pasir Logok Estate	2097.7	Certified	Nil	2009	20-Apr-22	Yes	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil
Bukit Layang Estate	Malaysia	Bukit Layang Estate	397.76	Certified	Nil	12-Jul	20-Apr-22	Yes	Nil	We completed the disposal of our Indonesia operation in August 2023	Nil



### 3.3 Details of Nonconformities

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

During this Assessment there were One (1) Critical; Zero (0) Minor nonconformities and One of OFI Opportunity For Improvement raised. The Johor Plantations Berhad Tereh 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 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	Non-conformity						
NCR Ref #	2413044-202310-M1	Issued Date	02/11/2023				
Due Date	18/12/2023	Closure Date	18/12/2023				
Indicator & Category (Critical / Minor)	6.7.3 Major						
Statement of Nonconformity:	PPE usage for Manuring Act	ivity was not effectively imple	emented.				
Requirement Reference:	(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.						
Objective Evidence:	During site visit at Tereh Selatan Estate, Field P17/3, Manuring operation (Mix 1) it was found that all 4 workers was not wearing Mask as their PPE. It was not in line with Procedure Manuring and HIRARC that was referred to SDS Section 8.3 Personal Protective Equipment (PPE), safety glass / goggles, Gloves, wear body covering clothing, rubber shoes and use approved respiratory protective equipment.						
Corrections:	Estate management conducted the briefing on the importance of wearing PPEs to the workers on 31st October 2023.						
Root Cause Analysis:	Inadequate monitoring by estate management on PPE usage during Manuring Activity in accordance with the established Standard Operating Procedure (SOP) and HIRARC.						
Corrective Actions:	<ol> <li>The mandor will monitor and ensure the workers use the PPE during manuring activity through PPE checklist</li> <li>The refresher training plan will be reviewed and conducted quarterly.</li> <li>Training Evaluation form for each participant to ensure the training objective</li> </ol>						
	has been delivered effectively.						
Assessment Conclusion:		e visit and interview with Ma d P17/4 found all of them was					

<ol> <li>Monitoring on PPE has been conducted by Mandore as per record dated November 2023. Inspection on the checklist of each PPE required for Manurer and been done.</li> </ol>
3. Training on importance of PPE has been conducted on 31/10/2023. Sighted training programme title "Training Programme For Importance of Wearing PPE and manuring Application Using Spreader and Manual 2024" has been established. Training on manuring application has been conducted on 13/12/2023. Sighted evidence of training material, attendance and photos. Training evaluation to check trainee understanding has been recorded. Refer Training evaluation for with reference number SQD/SMS/3.14-F2 dated 31/10/2023 and 13/12/2023.
4. Interview with estate management confirmed that correction and corrective action has been implemented.
Based on the above evidence, the major non-Conformity is closed effectively on 18/12/2023. Continuous implementation will be further verified in the next assessment.

Opport	Opportunity for Improvements							
OFI #	Description							
OFI 1	2413044-202310-I1, 3.6.1 The JKKP-approved assessor (HQ/16/ASS/00/35) conducted the latest Chemical Health Risk Assessment (CHRA) on May and June 2023 for Tereh Palm Oil Mill certification units. The final version of the report for this CHRA is still pending until the Recertification Assessment is conducted. This OFI was raised to track the status of the report during the next assessment.							

Positive Findings						
PF #	Description					
PF 1	Good Implementation of GAP across the estates.					
PF 2	Good understanding by staffs and workers on GAP, H&S and Environment Protections.					

### 3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity						
NCR Ref #	N/A Issued Date N/A					
Due Date	N/A	Closure Date	N/A			
Indicator & Category (Critical / Minor)	N/A					
Statement of Nonconformity:	N/A					
Requirement Reference:	N/A					
<b>Objective Evidence:</b>	N/A					

## RSPO P&C Public Summary Report Revision 15 (Nov 2023)

Corrections:	N/A
Root Cause Analysis:	N/A
Corrective Actions:	N/A
Assessment Conclusion:	N/A
Effectiveness Closure (for previous audit closed Critical NC):	N/A

<b>Previous Audit Minor N</b>	Previous Audit Minor Non-conformity							
NCR Ref #	2270752-202210-N1	Issued Date	03/11/2022					
Due Date	02/11/2023	Closure Date	02/11/2023					
Indicator & Category (Critical / Minor)	7.3.1 Minor							
Statement of Nonconformity:	The established Waste Mana	gement Plan was not effective	ely implemented.					
Requirement Reference:	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.							
<b>Objective Evidence:</b>	Tereh Selatan Estate							
	The waste management plan conducted as per Work Instr 01/10/2022. Refer document	ruction, Scheduled Waste, Is						
	In the SOP established, unde waste were according:	er section 6 Reference stated	I the storage of schedule					
	<ul> <li>6.4 Waste Card as per 7<sup>th</sup> Scheduled of Environmental Quality (Scheduled Wastes) Regulations 2005</li> <li>6.5 Work Instructions on scheduled waste management (this document)</li> <li>6.6 SOP on packaging and labelling scheduled waste for disposal</li> <li>6.7 Standard label for scheduled waste</li> </ul>							
	Based on the Scheduled Waste Inventory document for contaminated soil (SW408) and 1L 2T Oil Container (SW409), noted date of generation was recorded at 16/07/2022 and 15/07/2022 respectively. During site visit at Scheduled Waste Store, it was noted that the SW 409 and SW 408 waste was stored without labelling as per Environmental Quality (Scheduled Wastes) Regulations 2005 and Guidelines for Packaging, Labelling and Storage of Scheduled Waste in Malaysia.							
	<u>Tereh Utara Estate</u>							
	During site visit at Scheduled Waste Store, it was noted that the SW 306 Storage Container was filled and the First-Generation Date at the container was recorded as 29/11/2021. Reviewed the Scheduled Waste Record Book, the first-generation date for SW 306 was also recorded as 29/11/2021 after latest disposal on 07/10/2021. Latest inventory was recorded at 80 L. The scheduled waste has not been disposed and was stored for more than 180 days without prior permission from DOE.							

RSPO P&C Public Summary Report

### Revision 15 (Nov 2023)

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	As per waste management plan, the scheduled waste management must be conducted as per Work Instruction, Scheduled Waste, issue no. 1, rev. 0. Dated 01/101/2022. Refer document no. SPO/WI/06. As per WI established in section 2.6 Inspection of Scheduled Waste stated that "Scheduled Waste are not stored for more than 180 days from date of first generated and more than 20 MT.				
Corrections:	<ul> <li><u>Tereh Selatan Estate</u></li> <li>The containers were immediately labelled as per Environmental Quality (Scheduled Wastes) Regulations 2005 and Guidelines for Packaging, Labelling and Storage of Scheduled Waste.</li> <li>Refresher Training had been conducted for store operator on 15/11/2022. During the training, the test was given to evaluate the operator's understanding on the training.</li> <li><u>Tereh Utara Estate</u></li> <li>Tereh Utara Estate had submitted Collection Transportation Instruction (CTI) to</li> </ul>				
De et Course Angelerier	Kualiti Alam on 06/11/2022 and proposed to collect on 17/11/2022,				
Root Cause Analysis:	Inadequate monitoring over SW Management Plan by Estate Management.				
Corrective Actions:	<ol> <li>Tereh Selatan Estate</li> <li>Monthly Monitoring by Estate Management to ensure all label was appropriately in place.</li> <li>A CEPSWAM course was arranged by HCMD on 20 – 24/11/2022 for Assistant Manager to become competent SW Personnel.</li> <li>Tereh Utara Estate</li> <li>Monthly Monitoring by Estate Management to ensure scheduled waste will be disposed within 180 days as per DOE requirements.</li> <li>A CEPSWAM course was arranged by HCMD on 20 – 24/11/2022 for Assistant Manager to become competent SW Personnel.</li> <li>A CEPSWAM course was arranged by HCMD on 20 – 24/11/2022 for Assistant Manager to become competent SW Personnel.</li> <li>Training on Scheduled Waste Management will be conducted to the staff in charge tentatively on 28/11/2022.</li> </ol>				
Assessment Conclusion:	During the site visit to all sampled estates, it was observed that the Schedule Waste was appropriately labeled in accordance with the EQA requirements. The inventory records of the schedule waste were found to be accurate on-site, and all estates successfully disposed of the Schedule Waste through licensed entities, with disposal records readily available for review. At Tereh Selatan Estate, Estate Management conducts monthly monitoring to ensure proper labeling. Training records dated 14/03/2023 were duly verified, and interviews with operators confirmed their proficiency in handling schedule waste. Furthermore, the Assistant Manager completed a CEPSWAM course from 20 – 24/11/2022, enhancing competence in Scheduled Waste (SW) management, as evidenced by the certificate dated 16/01/2023 with serial number CePSWaM/2320092. For Tereh Utara Estate, monthly monitoring is in place to ensure scheduled waste is disposed of within the mandated 180 days. The Assistant Manager completed a CEPSWAM course from 20 – 24/11/2022, obtaining a certificate issued on 16/01/2023 with serial number CePSWaM course from 20 – 24/11/2022, obtaining a certificate issued on 16/01/2023 with serial number CePSWaM course from 20 – 24/11/2022, obtaining a certificate issued on 16/01/2023 with serial number CePSWaM course from 20 – 24/11/2022, obtaining a certificate issued on 16/01/2023 with serial number CePSWaM/2320091. Additionally, a training session for the staff in charge was conducted on 15/06/2023 to further enhance expertise in Scheduled Waste Management.				



These corrective actions underscore the commitment to compliance and continual improvement in environmental management practices. Consequently, the minor non-conformance raised has been effectively addressed and closed.

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

#### 3.3.2 Summary of the Nonconformities and Status

	Category (Critical / Minor)		Issued Date	Status & Date (Closure)
2270752-202210-N1	Minor	7.3.1	03/11/2022	Closed on 02/11/2023
2413044-202310-M1	Major	6.7.3	02/11/2023	Closed on 18/12/2023

#### 3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Johor Plantations Berhad - Tereh 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. 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	Stakeholder name / organization	Means of communication
Government agencies	Mohamad Fauzi bin Kamaruddin ,SMK Dato' Haji Hasanal Yunos	Face to face
Contractor	Lai Ming Chin, Lee Kim Joo Enteprise	Face to face
Government agencies	Puan Hasliza, Perkeso Segamat	Face to face
Government agencies	Mr Azamuddin Kassan, Pejabat Perhutanan Johor Bharu	Face to face

Neighbouring estate	Assistant Manager, Kekayaan Estate, KLK.	Face to face
Local communities	Kampung Melayu Sedenak	Face to face

Stake	holders comment
1	<b>Feedbacks:</b> Assistant Manager, Kekayaan Estate, KLK. Kekayaan Estate, KLK located nearby to Tereh Selatan Estate as per interview with Assistant Manager, there is no land dispute has been highlighted where both companies already identified their boundaries base on the boundary stone and trenches. Any communication between both parties will be through PIC for each estate and confirmed that communication of the procedure has been done during the stakeholder meeting.
	Audit Team verification and response: No further verification required
2	<b>Feedbacks:</b> Puan Hasliza, Perkeso Segamat Puan Hasliza has been contacted by auditor to get information about Tereh Palm Oil Mill and Supply Bases. As per interview, there is no issues on contribution by operating units. There is no issue on error in contribution.
	Audit Team verification and response: No further verification required
3	<b>Feedbacks:</b> SMK Dato' Haji Hasanal Yunos located around 2km from Rengam Estate and Mr Mohamad Fauzi bin Kamaruddin is the deputy head master with total 500 students which come from nearby village and Rengam Estate. Contribution has been provided by the management of estate/POM in term of financially, technically, and human power to the school upon request and has been confirmed through interview and document review.
	Audit Team verification and response: No further verification required
4	<b>Feedbacks:</b> Lee Kim Joo Enteprise is a FFB transporter contractor in Rengam Estate. He mentioned that there is tendering process which has been announced by procurement department and they has been selected base on quotation that has been provided. In term of payment, there is no issues which payment has followed the payment term as per stated in the invoices.
	Audit Team verification and response: No further verification required
5	<b>Feedbacks:</b> Kampung Melayu Sedenak Having good relationship with company management. No disturbance or negative impact caused by the mill and estate operation. In fact, positive impact mainly job opportunity within Kulim's mill and estate that benefits the villagers. No issue of land dispute between villagers and estate.
	Audit Team verification and response: No further verification required
6	Feedbacks:Mr Azamuddin Kassan, Pejabat Perhutanan Johor BharuMr Azamuddin is the head of Pejabat Perhutanan Johor Bharu and has been served since past 5 years. He said that good relationships have been maintained by both parties. Consultation and communication of fire prevention has been discussed during the stakeholder meetings. He also mentioned that there is no illegal hunting/ logging that has been done by staff/workers from both operating units. The management of both operating units supported Pejabat Perhutanan in order to preserve to reserve forest.
	Audit Team verification and response: No further verification required



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
Tereh Palm Oil Mill Certification Unit has undergone 2 <sup>nd</sup> Cycle of Replanting. Hence, this is not applicable.					

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

### 3.5 Impartiality and conflict of interest

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

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

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Johor Plantations Berhad Tereh 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 Johor Plantations Berhad Tereh Palm Oil Mill is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name:	Name:
NOR HALIS ABU ZAR	WAN ADLIN WAN MAHMOOD
Company Name:	Company Name:
BSI SERVICES MALAYSIA SDN BHD	JOHOR PLANTATIONS GROUP BERHAD
Title:	Title:
CLIENT MANAGER	GENERAL MANAGER
Signature:	Signature:
the.	(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.)
	( And albid mound
Date: 18/12/2023	Date: 3/1/2023



### **Appendix A: Summary of Findings**

Criterio	on / Indicator	Assessment Findings	Compliance		
Princip	Principle 1: Behave ethically and transparently				
	on 1.1: The unit of certification provides adequate information to relevant iate languages and forms to allow for effective participation in decision make		RSPO Criteria, in		
1.1.1	<ul> <li>(C) Documents that are specified in the RSPO P&amp;C are made available to the public.</li> <li>- Critical (Major) compliance -</li> </ul>	List of documents that has been specified in RSPO has been outline in the document title "Transparency" document number SQD/SMS/1.0 dated 01/08/2020 issuance 01 which listed total 14 documents but not limited to document that has been listed as long as did not impinge on confidentiality and will not cause detrimental sustainability or social outcomes. It also has been communicated with stakeholders during the stakeholders consultations.	Complied		
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	As per verifications by the auditor, all documents and records has been established in either English or Bahasa Malaysia. As per interview with the management, explanations by social person in charge to the requester will be done if required. There is evidence that all documents is accessible to all stakeholders as per stipulated in the consultation and communication procedure document number SQD/SMS/1.1 dated 01/08/2020 issuance no.01.	Complied		
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	There is no information request has been received for each operating units which sighted only request for assistance by nearby local communities and stakeholders. However, the management of each operating units has established logbook for any information request and will be responded as per consultation and communication procedure document number SQD/SMS/1.1 dated 01/08/2020 issuance no.01.	Complied		



**RSPO P&C Public Summary Report** 

### Revision 15 (Nov 2023)

1.1.4	<ul> <li>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</li> <li>- Critical (Major) compliance -</li> </ul>	Consultation and communication document number SQD/SMS/1.1 dated 01/08/2020 issuance no.01. Stated in the procedure mode for external and internal communication which include through phone call, email, internet, women representative meeting and stakeholders meeting. As per site visit, there is evidence that the policy and procedure has been posted at the notice board at the entrance gate, office and housing. It also has been communicated with stakeholders during the stakeholders consultations.	Complied
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	List of stakeholders has been maintained by each operating units which include information such as person in charge, address, contact numbers and email address. As per interview, auditor has been informed that the list of stakeholders will be updated on annual basis or if there is any changes of stakeholders such as new appointment of contractors or others. Refer latest stakeholders list updated on April 2023.	Complied
Criterio	n 1.2: The unit of certification commits to ethical conduct in all business of	perations and transactions.	
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	Code of ethical conduct policy has been established in the document "Polisi Etika" approved by Mr Mohd Faris Adli Shukeri dated 07/12/2021 where the company committed to maintain ethical conduct in all business operations including recruitments and contracts. As per verification, there is evidence that the policy has been implemented which all contract is based on tendering process and it has been monitored through the whistleblowing policy.	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	A system has been established which has been monitored through the internal audit that has been conducted for each operating and verified base on the internal audit report. There is no noncompliance of the policy has been identified through the internal audit. Other than that, the management has established whistleblowing policy which has been established which any issues of	Complied

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### Revision 15 (Nov 2023)

Principle 2: Operate legally and respect rights				
2.1.1	<ul> <li><b>c) 1</b>: There is compliance with all applicable local, national and ratified</li> <li>(C) The Unit of Certification complies with legal requirements</li> <li>Critical (Major) compliance -</li> </ul>	The unit of certifications has complied with Legal Requirements. Tereh Palm Oil Mill Certification Unit continues to ensure compliance towards all applicable local, national and ratified international laws and regulations. The compliances is guided by the document Sustainable Management System; Compliance To Legal Requirement; Document Number: SQD/SMS/2.0; Document Date: 01/08/2020; Issue: 01. Among permit and license sampled were: Tereh Selatan EstateCompl1.MPOB Licence #501674902000 valid from 01/05/2023 until 30/04/202401/08/2023 until 24/07/20253.SPAN Licence #LK/3/23/00493 valid from 16/05/2023 until 15/05/20264.Energy Commission permit #2023/03104 valid from 24/10/2023 until 23/10/20245.Abstraction Licence #BAKAJ/334/300/05/07/15 valid until 31/12/20236.Air Receiver #JH PMT 20401 valid until 21/06/2024	lied	

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

7. Genset Licence #AS(B):91/110/638/067 by DOE dated 19/01/2026	
8. Weighbridge inspection #B1809393 by De Metrology dated 09/09/2023	
Rengam Estate	
1. MPOB Licence #501225502000 valid from 11/05/2023 until 31/03/2024	
2. Diesel permit #0027SK valid from 11/07/2023 until 10/07/2025	
3. Air Compressor #JH PMT 24154 valid until 21/06/2024	
4. Windfall levy #J31-200800000092 dated 15/07/2008	
5. Weighbridge inspection #3140578 by De Metrology dated 05/07/2023	
6. Fire Arm Permit #KLG/1742 valid until 17/10/2024.	
Tereh Palm Oil Mill	
1. MPOB Licence #500048604000 valid from 01/06/2023 until 31/05/2024	
2. Diesel storage #BPKB/2023/P/J-000293 valid from 15/10/2023 until 14/10/2025	
3. DOE Licence #004685 valid from 01/07/2023 until 30/06/2024	
4. Abstraction Licence #07/A/KLG/115 valid until 31/12/2023	
5. Air Compressor #JH PMT114303 valid until 12/09/2024	
6. Vertical Steriliser #JH PMT23917 valid until 12/09/2024	

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

7.	. Weighbridge Inspection #013609 inspected by De Metrology dated 24/05/2023
8.	Competence Person #CePPOME/15006 to Mill Manager dated 23/01/2019
9.	. Competence Person #CePSWaM/03279 to Assistant Mill Manager dated 09/12/2019
10	0. Competence Person #JKKP/2022/JS01/150 to Mill Manager dated 23/08/2022
Se	elai Estate
1.	. MPOB Licence #621316002000 valid from 10/01/2023 until 30/09/2024
2.	Diesel permit #BPGK.JH(KLU)2407SK valid from 03/07/2023 until 02/07/2015
3.	. Energy Commission #LS/HTC/UME/SLS/1:UM/HTC/LS/01 valid until 01/11/2023. Renewal has been submitted on 17/10/2023 with reference number ST(SJB)L/JHR/05600
4.	. Water abstraction licence #BAKAJ/334/300/05/07/07/13 valid until 31/12/2023
5.	Air Compressor #JH PMT 18281 valid until 21/06/2024
6.	. Air Receiver tank #JH PMT 21933 valid until 21/06/2024
Se	g Tawing Estate
1.	. MPOB Licence #621320002000 valid from 01/10/2023 until 30/09/2024
2.	. Water Abstraction Licence #BAKAJ/334/300/05/07/07/17 valid until 31/12/2023
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#### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

		3. Diesel permit #BPGKJH(KLU)2412SK valid from 12/06/2023 until 11/06/2025	
		4. Air Tank #JHPMT90178 valid until 14/02/2024	
		Weighbridge inspection #186058 by De Metrology dated 12/07/2022	
2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations. - Minor compliance -	Certification unit continued to implement and maintain their established documented system for identifying, accessing, tracking updates and monitoring of compliance with the legal requirements that are applicable to their operation.	Complied
		Each office of the operating unit (estates) has its own legal requirements register (LRR) and were being evaluated individually from time to time for compliance mainly through internal audit. Among the applicable legal laws registered are EQA, OSHA, Factory & Machinery Act, Employment Act, and Workers' Minimum Standard of Housing and Amenities Act.	
		Latest updated has been done on 31/08/2023 with updating Of Minimum wages Order 2022, Employees Provident Fund (Amendment No. 2) Rules 2022, Employees Provident Fund (Amendment Of Eight Schedule) Order 2022 and Prevention And Control Of Infectious Disease (Measures Within Infected Local Areas) (National Recovery Plan) (Transition Phase To Endemic) 2022.	
		The Executive Regional Controller of Central Region has been appointed as the person in-charged, Refer Appointment letter with reference number SID/SD/ADMIN/046/23 dated 08/09/2023 to be the person responsible to monitor compliance and to track and update the changes in regulatory requirements. The letter was from the Head of Sustainability & Innovation Division. Tracking system to identify changes in the relevant regulations were available through	

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RSPO P&C Public Summary Report

#### Revision 15 (Nov 2023)

		the head office, website information and is communicated from the Group Head Office.	
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised	The management of each estate has established the Boundary Stone Maps showing the location of the boundary stone at estate.	Complied
	boundaries. - Minor compliance -	Site visit for verification on boundary stone was conducted at each estate with the details as followings:	
		Tereh Selatan Estate	
		As sighted during site visit P07/01 (2°9'32" N, 103°21'14" E) adjacent with smallholder estate, the legal boundaries was clearly demarcated with red and white colour concrete pole.	
		Rengam Estate	
		During site visit, sighted the demarcation of estate legal boundaries at field P17/05 (1°54′23″ N, 103°24′37″ E) adjacent with smallholder's farm was clearly demarcated with red and white colour concrete pole number LR10	
		Selai Estate	
		Estate legal boundaries was clearly demarcated with red and white colour concrete pole as sighted at field P09/4.	
		Sungai Tawing Estate	
		Estate legal boundaries was clearly demarcated with red and white colour concrete pole as sighted at field P03/4 adjacent with smallholders farms.	
		There is no planting beyond the boundary markers for all estate visited.	
Criterio	<b>2.2:</b> All contractors providing operational services and supplying labour,	and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	
2.2.1	A list of contracted parties is maintained. - Minor compliance -	All operating units have recorded all contracted parties in a Stakeholder List. This list, which gets updated annually, comprises internal stakeholders like employees and workers' unions, as well as	Complied
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PF441

Page 39 of 171

#### **RSPO P&C Public Summary Report**

#### Revision 15 (Nov 2023)

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 -       - Minor compliance -       - Minor compliance -       Sample of contract has been taken for 2 contractors which is Pemborong Jaya and Chayono Contractor.       Rengam Estate         2.2.3       All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection Minor compliance -       All contracts, including those for their protection Minor compliance -       Refer Addendum To The Contract Agreement Clause: Contractor contractor represent and warrant that the contract or spall comply with applicable labour and employment laws, regarding and prohibits any form of child labour, forced and trafficked labour. Any eligible young labour will be employed only in       Complete contractor spall contract agreement where specifically mentioned the contract agreement where specifically mentioned the contract or spall comply with applicable labour and employment laws.			external stakeholders such as suppliers, contractors, transporters, product buyers, heads of local communities, and other interested parties like government departments, hospitals, schools, etc. The list undergoes an annual review and update.	
child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection. - Minor compliance -	2.2.2	<ul><li>meeting applicable legal requirements, and this can be demonstrated by the third party.</li><li>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</li></ul>	services. There is an addendum to the contract agreement where specifically mentioned the contractor shall comply with applicable labour and employment laws. Sampled of the contract agreement as below: <u>Tereh Selatan Estate</u> Sample of contract has been taken for 2 contractors which is Pemborong Jaya and Chayono Contractor. <u>Rengam Estate</u> 1 sample of FFB transport contractors has been taken and sighted agreement reference number MPSB/Rengam 7/169/2020 dated 27/01/2023 for contractor Lai Cheong San <u>Selai Estate</u> Perniagaan Sri Mahtai reference number ROC/SELAI 47/2023/01 for loading and transporting fresh fruits bunches (FFB) internal from	Complied
1966. Other than that, for Letter Of Award (LOA) refer section 15.7 stipulated on the same commitment.	2.2.3	child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	Employees (2) The Contractor represent and warrant that the contractor shall comply with applicable labour and employment laws, regarding and prohibits any form of child labour, forced and trafficked labour. Any eligible young labour will be employed only in accordance with Children and Young Person (Employment) Act 1966. Other than that, for Letter Of Award (LOA) refer section 15.7	Complied

### **RSPO P&C Public Summary Report**

#### Revision 15 (Nov 2023)

2.3.1	<ul> <li>(C) For all directly sourced FFB, the mill requires:</li> <li>Information on geo-location of FFB origins</li> <li>Evidence of the ownership status or the right/daim to the land, or valid use of land by the grower/smallholder</li> <li>One or more supporting documents for claims</li> <li>Valid MPOB license</li> <li>Critical (Major) compliance -</li> </ul>	Tereh Palm Oil Mill exclusively receives crops from the Johor Plantation Berhad Estates and its internal supply sources, all of which fall within the certification scope. Any other sources, if utilized, are deviations caused by sister mills (RSPO Certified) due to mill breakdowns or annual maintenance. During the audit, it was confirmed that all estates within the same certification scope have the following information available and were observed and verified. The information such as geo-location of FFB origins can be referred to table 4 above. All fresh fruit bunches (FFB) from the supply base estates have corresponding delivery documents and weighbridge tickets and valid land title with ownership status. All sample estate visited found to have valid MPOB license and verified land titles that shows the legal ownership of the estates.	Complied
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 -	The examination and validation of delivery records confirmed that there are sourcing of RSPO Certified ISH Fresh Fruit Bunches (FFB) from indirect suppliers at Tereh Palm Oil Mill namely Eng Lee Heng (WAGS- West – Wild Asia Sdn Bhd – Certificate Number: RSPO 660787 – Expiry Date: 19/03/2025. The records of all the FFB suppliers are able to be verified with the availability of the details stipulated in the 2.3.1	Complied
Princip	le 3: Optimise productivity, efficiency, positive impacts and resilie	nce	
Criterio	<b>n 3.1:</b> There is an implemented management plan that aims to achieve lor	ng-term economic and financial viability.	
3.1.1	<ul> <li>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</li> <li>- Critical (Major) compliance -</li> </ul>	Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. Sighted the annual budget FY 2022 and business plan FY 2023 – FY 2027. The business plan includes:	Complied

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

[]			1
		Plantations	
		<ol> <li>Production – FFB tonnes</li> <li>General Charges         <ul> <li>Supervision</li> <li>Rent, rates and taxes</li> <li>Office expense</li> <li>Maintenance</li> <li>Water and lights</li> <li>Labour welfare</li> <li>Medical</li> </ul> </li> <li>Production</li> <li>Maintenance</li> <li>Harvesting</li> </ol>	
		Palm Oil Mill	
		<ol> <li>FFB yield,</li> <li>CPO,</li> <li>OER and KER,</li> <li>General Charges         <ul> <li>a. Supervision</li> <li>b. Rent, rates and taxes</li> <li>c. Office expense</li> <li>d. Maintenance</li> <li>e. Water and lights</li> <li>f. Labour welfare</li> <li>g. Medical</li> </ul> </li> <li>Froduction</li> <li>Maintenance</li> </ol>	
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	The estates have long range replanting program. Replanting planned for the palm older than 25 years, non-performance field	Complied

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### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

	- Minor compliance -	(yield) and program for					e replanting	
		Estate	2024	2025	2026	2027	2028	
		Tereh Selatan Estate	0.00	198.08	239.93	226.01	0.00	
		Rengam Estate	221.96	0.00	0.00	0.00	256.07	
		Sg Tawing Estate	95.42	48.10	85.58	307.22	250.06	
		Selai Estate	0.00	0.00	0.00	0.00	0.00	
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 -		SOP estab	lished. The			y Operating vas sighted.	Complied
		1. Introdu	iction					
		2. Matters	s Arising					
		3. Operati	ion Perform	ance and F	Product Con	npliance		
		4. Custom	ner feedbac	k				
		5. Change	es in the op	eration				
		6. Interna	l and Exter	nal Audit re	eport			
		7. Compla	aint & Griev	ances				

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

		8. Continuous Improvement	
		Review minutes of meeting of:	
		Tereh Selatan Estate: 26/07/2023	
		Rengam Estate: 28/08/2023	
		Tereh Palm Oil Mill: 14/07/2023	
		Sg Tawing Estate: 24/08/2023	
		Selai Estate: 16/08/2023	
	<b>on 3.2</b> : The unit of Certification regularly monitors and reviews their econom demonstrable Continuous improvement in key operations.		nts action plans
3.2.1	<ul> <li>(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.</li> <li>- Critical (Major) compliance -</li> </ul>	The continuous improvement plan for the financial year 2023 was accessible for the mill and each of the sampled estates. This plan was developed with a foundation in the assessment of social and environmental impacts. Sample of the continuous improvement plan are following: <u>Tereh Palm Oil Mill</u> 1. Social – Steel wardrobe, steel bed and mattress – Probase road at linesite. 2. Environment – Desludging of furrow – Maintenance of Bund at furrow and effluent 3. Safety	Complied

#### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

	The management has established the environment improvement plan 2023. Sample of the discussion is the dewatering screw press, polishing plan and upstream and downstream analysis for impact of effluent into land application over BOD limit. <u>Tereh Selatan Estate</u> 1. OSHA - Purchase of new fire extinguisher 2. Social - Replace V drain - Repair of toilet bathroom - Repainting of workers housing - Fixing of clothing hangar - Ceiling fan at Creche 3. Environment - Beneficial Plant planting - Guatemala planting Selai Estate 1. OSHA - Install safety signages at workstation 2. Social - Add new furniture at staff house - Repainting labour quarters - Mattress and single bed for labour quarters - Upkeep of septic tank labour quarters - Hall replanting - Surau extension - Upgrading of volley ball court 3. Environment - Increase beneficial plant area
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### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template]. <b>PROCEDURAL NOTE:</b> The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed. Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required. - Minor Compliance -	Sg Tawing Estate         1. OSHA         - Repair crack wall at fertilizer store         - Repair rainwater gutter at fertilizer store         2. Social         - Replace parameter drain         - Replace window naco         - Replace toilet door         - Painting of housing         3. Environment         - Planting of beneficial plant         - Planting of Guatemala for erosion control         The reporting of metrics for Johor Plantation Berhad Tereh         Certification Unit utilizes RSPO metric template version 2.1. The         data reporting period covers January to December 2022 for social         and environmental metrics, while economic metrics span from         September 2022 to August 2023, counting back from the audit         month.         Following a verification process with input data, it has been         confirmed that there are no discrepancies in the reported data for         all metrics during the specified period.	Complied
Criterie	on 3.3: Operating procedures are Appropriately documented, consistently im	plemented and monitored.	
3.3.1	<ul> <li>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</li> <li>- Critical (Major) compliance -</li> </ul>	Johor Plantations Berhad has established Standard Operating Procedure as guidance for daily operation for the mills and estates. The mill and estates holds 3 SOPs as follows: 1. Mill Quality Management updated 2018 (for Palm Oil mill)	Complied

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

	2. Agriculture Manual updated 2019 (for Plantations)	
	3. Sustainable Management System dated 2020	
	4. Safety Work Procedure dated 2009	
	The management has established a system to monitor the mill and estates operation such as Internal Audit, Operational Checklist, Workplace Inspection, Management Review Meeting and Mill/Estates Inspection Visit.	
ementation of procedures is in place.	The following mechanism is available and adopted as standard practices and procedures in the mill and estates operations.	Complied
	Tereh Palm Oil Mill	
	1. Mill inspectorate Visit program 2x /year	
	2. Internal audit by Sustainability Unit 2x /year	
	3. Task Force visits	
	4. Monthly and weekly ad hoc meetings	
	5. Daily /monthly production & financial report	
	6. Daily and monthly lab analysis report.	
	7. Daily supervision by the mill Supervisors/Executives	
	Supply Base Estates	
	1. Plantation Inspectorate Visit program 2x /year	
	2. Internal audit by Sustainability Unit 2x /year	
	3. Task Force visits	
	4. Monthly and weekly ad hoc meeting	
	ementation of procedures is in place.	4. Safety Work Procedure dated 2009The management has established a system to monitor the mill and estates operation such as Internal Audit, Operational Checklist, Workplace Inspection, Management Review Meeting and Mill/Estates Inspection Visit.ementation of procedures is in place.The following mechanism is available and adopted as standard practices and procedures in the mill and estates operations. Tereh Palm Oil Mill 1. Mill inspectorate Visit program 2x /year 2. Internal audit by Sustainability Unit 2x /year 3. Task Force visits 4. Monthly and weekly ad hoc meetings 

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

		5. Daily /monthly production & financial report	
		Daily supervision by the field staff/Executives.	
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	Johor Plantations Berhad established mechanism to check the effective implementation of the procedure. Among the mechanism such as Mill/Plantation Advisor Visit, Agronomist visit and Internal Audit. Reviewed the records as follows:	Complied
		Tereh Selatan Estate	
		1. Plantation Inspectorate (PI) Visit 01/2023 dated 10/08/2023	
		2. Agronomist Report 01/2023 dated 20&21/03/2023	
		3. Internal Audit Report dated 13/07/2023	
		Rengam Estate	
		1. Plantation Inspectorate (PI) Visit 01/2023 dated 19&20/06/2023	
		2. Agronomist Report 02/2023 dated 09/10/2023	
		3. Internal Audit Report dated 17/08/2023	
		Tereh Palm Oil Mill	
		1. Plantation Inspectorate (PI) Visit 03/2023 dated 21&24/08/2023	
		2. Internal Audit report conducted on 11/07/023. No issue were raised during the audit.	
		3. JKKP Visit dated 07/06/2023	
		Selai Estate	
		1. Plantation Inspectorate (PI) Visit 01/2023 dated 22/08/2023	

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

Criteric	<b>n 3.4:</b> A comprehensive Social and Environmental Impact Assessment (SEIA	<ol> <li>Agronomist Report 01/2023 dated 09/05/2023</li> <li>Internal Audit Report dated 14/08/2023</li> <li>Sg Tawing Estate</li> <li>Plantation Inspectorate (PI) Visit 01/2023 dated 11/09/2023</li> <li>Agronomist Report 01/2023 dated 27&amp;28/08/2023</li> <li>Internal Audit Report dated 16/08/2023</li> <li>Agronomist Report to new plantings or operations, and a social and a soci</li></ol>	d environmental
	ment and monitoring plan is implemented and regularly updated in ongoing		a environmental
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -	There is no new plantings and new operation in the estates and mill respectively. Sustainability & Quality Department has carried out Social Impact Assessment on 15/9/21 for Tereh Palm Oil Mill certification unit. The assessment has involved participation of contractors and internal workers. Checklist Interview was utilized during interview with the stakeholders for SIA. The social impact register is developed based on the scoring of frequency, consequence and likelihood. Social Management Plan will be developed after the social impact register established. There is no new planting in the 3 estates. This is verified through the following document/facts: a) Hectare statement compared to the previous year. b) Interviews with the management The assessment has been done through consultation with stakeholders for both operating units which include internal stakeholders (foreign and local worker, sundry shops and canteen, contractor). While for external stakeholders, stakeholders that has been consulted included local communities, neighbouring estate, government agencies.	Complied

#### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

Information collection also has been collected based on the previous meeting that has been conducted such Workers representative meeting, OSH meetings and gender committee meetings.	
The operating units have conducted the aspects and impacts analysis and documented in the Environmental Risk Assessment Form. The analysis was reviewed on annually basis. The risk assessment register was conducted on activity in the estate such as clinic, compound, harvesting, manuring, office, schedule waste, storage. Latest review was conducted as follows.1.Tereh Palm Oil Mill	
<ul> <li>Latest review was conducted on 28/08/2023 approved on 30/08/2023, conducted by the Asst. manager. Refer document no. EIA-LTM-2023</li> </ul>	
2. Tereh Selatan Estate	
<ul> <li>Latest review was conducted on 15/08/2023 approved on 30/08/2023, conducted by the Asst. Manager. Refer document no. KULIM-LTS-2023.</li> </ul>	
3. Rengam Estate	
<ul> <li>Latest review was conducted 22/08/2023, conducted by the Asst. Manager. Refer document no. KULIM-LR-2022.</li> </ul>	
4. Selai Estate	
- Latest review was conducted on 31/01/2023 , conducted by the Asst. Manager. Refer document no. KULIM-LS-2023.	
5. Sg Tawing Estate	
- Latest review was conducted on 11/02/2023 by Asst. Manager. Document No: KULIM-LST-2023W	

RSPO P&C Public Summary Report

#### Revision 15 (Nov 2023)

3.4.2	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	Social management plan has been established for each operating unit which updated on "Daftar Impak Sosial Mengikut Operasi 2023".	Complied
	vis pa be	There are issues that has been highlighted based on SUHAKAM visit which stated that the management need to look into on passport retention by the management. Management plan has been established to ensure all passport keep by the estate unless for passport renewal.	
		Other than that, the management has established management plan for grievance/complaint procedure which need to be communicated to all workers, stakeholders including illiterate parties.	
		For workers representative meeting which mainly NUPW members will be conducted every 3 months to ensure all issues related to workers can be highlighted during the meeting	
		Awareness on minimum wages standard according to minimum wages standard need to be established which also has been included in the management.	
		The Social & Environment Management Plan for the year 2023 has been made available to the Certification Unit (CU). This comprehensive plan encompasses various elements, including objectives, categories, actions, frequencies, responsible individuals, and monitoring periods. Furthermore, any identified issues and their corresponding mitigation plans have been consolidated within the Social Management Plan and Environment Risk Assessment for the year 2023.	
3.4.3	<b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -	Implementation of the management plan has been reviewed and verified which sighted that it has been effectively implemented.	Complied

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

a. As per interview and records it has been verified that passport has been kept by the workers. During site visit to workers housing, auditors has been showed with passport.
b. Communication of the grievance/complaint procedure has been done and verified by the auditor for each operating units during the morning muster call.
c. Awareness on minimum wages has been conducted through NUPW workers representative and as per interview, workers can demonstrate their understanding on minimum wages
Minutes meeting for NUPW workers representative has been verified which has been conducted every 3 months once.
The operating units have established the Environmental Management Plan base on the Environmental Risk Assessment conducted. Reviewed the implementation of the management plan as follows:
Tereh Palm Oil Mill
1. The mill monitor the dewatering sludge screw press for continuous desludging. Reviewed the monitoring records for the month of September 2023 is available in the maintenance records
2. Mill to conduct the periodically tank and machine inspection and conduct the ERP training on oil spillage. The records of training is available for ERP conducted at mill.
3. To ensure effluent bund is in good conditions. Which mill conducted the monitoring of the furrow system and interview with the operator verified that the work are conducted. Site verification regarding the structure of bund, found that the area is well maintained.

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

1	
	Tereh Selatan Estate
	<ol> <li>To ensure the cleaning of PCD is conducted, the records of implementation is available for review. Site visit verification found the area is well maintain.</li> </ol>
	<ol> <li>Monitoring of buffer zone near the water sources. Records of monitoring is available until September 2023.</li> </ol>
	<ol> <li>Maintenance of vehicles, which was monthly conducted. The monitoring is available until September 2023.</li> </ol>
	Rengam Estate
	<ol> <li>To minimum pollution if any oil spillage occur, the estate continuously conducted ERP for oil spillage training to the workers. Reviewed the training attendance records and training material for training conducted on 02/10/2022.</li> </ol>
	2. The estate continuously conducted awareness briefing on environmental impact and pollution from replanting to the contractors. Latest briefing was conducted on 27/10/2023 during stakeholders meeting. Reviewed the minutes meeting and meeting Power Point material.
	Selai Estate
	<ol> <li>Monitoring of buffer zone near water sources, record of implementation conducted on July 2023</li> </ol>
	<ol> <li>Training on awareness of schedule waste management which was conducted in June 2023</li> </ol>
	<ol> <li>Cleaning on monitoring of PCD, maintenance and inspection of vehicles, and diesel genset engine. Records of implementation is conducted every months.</li> </ol>
	<ol> <li>Planting of cover crop and guetemala which was conducted on June 2023.</li> </ol>

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

		<ol> <li>Sg Tawing Estate</li> <li>Monitoring of buffer zone near water sources, record of implementation conducted in every month</li> <li>Training on awareness of domestic waste management which was conducted in April 2023</li> <li>Cleaning on monitoring of PCD, maintenance and inspection of vehicles, and diesel genset engine. Records of implementation is conducted every months.</li> <li>Reusing the chemical container for spraying activity which was conducted for every month in 2023.</li> </ol>	
	<b>n 3.5:</b> A system for managing human resources is in place.	There are no changes compare to lact year where all operating	
3.5.1	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 -	<ul> <li>There are no changes compare to last year where all operating units adopted same as SOPs as per reviewed and verified during the audit were the following SOPs:</li> <li>1) Recruitment of New Foreign Workers Rev. No. 1 Issue No. 1 dated 1 Jan 2019 which included recruitment, selection, hiring, promotion, retirement and termination</li> <li>2) Recruitment of Local Workers for Operating Units Rev No. 00 Issue No. 01 dated 1 October 2020. This SOP contains procedures for recruitment, promotion, retirement, and termination.</li> <li>Both procedure has been classified as publicly available and can be requested by stakeholders through the consultation and</li> </ul>	Complied
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	communication procedure. Sample of new workers has been taken for each operating units which has been recruited in year 2023 that has been selected from different origin countries. As per verification, there is evidence that the procedure has been effectively implemented. Reviewed of the document such as job application records, interview records and	Complied

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RSPO P&C Public Summary Report

#### Revision 15 (Nov 2023)

		pro	edical check-up records. It was confirmed that employment ocedures as per 3.5.1 was effectively implemented and all record s maintained.	
Criterio	n 3.6: An occupational health and safety (H&S) plan is documented, effective	vely	communicated and implemented.	
3.6.1	<ul> <li>(C) All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.</li> <li>- Critical (Major) compliance -</li> </ul>	to me Ha Spi rec	RARC was available for all operations within the mill and estates identify the hazards, assess and recommended control easures to minimize the risks. Among the HIRARC sampled were rvesting of FFB, P&D Control, Landfill Activities, manuring and raying Activities. Risks were also assessed in accordance to legal quirements and its recommendations were implemented as low.	OFI
		<u>Te</u>	reh Selatan Estate	
		1.	HIRARC has been review on 08/01/2023. Review HIRARC for Harvesting, Manuring and Spraying. All work conducted at field included their PPE and control was according to HIRARC.	
		2.	Chemical Health Risk Assessment was done in compliance with USECHH Regulation 2000. The assessment was conducted by TSM Training and Services Consultancy on 01/06/2023. The CHRA Report was in progress.	
		3.	Medical Surveillance for 2023 was conducted for 38 estate workers on 30/07/2023 for workers exposed to n-hexane, pesticides and hazardous fumes. The medical surveillance was conducted at Uni Klinik, Permas Jaya. The results indicated that all workers had no abnormal results that were occupational caused.	
		4.	Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) Regulations 2019. The assessment was conducted by Kulim Safety Training	

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#### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

	and Services Sdn Bhd on 22/12/2021. The NRA Report (Report Number: HQ/18/PEB/00/00014-2021/018 was available for verification.	
5.	Audiometric test was conducted by Kulim Safety Training and Services Sdn. Bhd for 25 estate workers on 13/01/2023.The results indicated No workers were diagnosed with Standard Threshold Shift (STS) and required to undergo retest within 3 months.	
R	engam Estate	
1.	HIRARC has been review on 21/09/2023. Review HIRARC for Mixed Chemicals, Census and Landfill . All work conducted at field included their PPE and control was according to HIRARC.	
2.	Chemical Health Risk Assessment was done in compliance with USECHH Regulation 2000. The assessment was conducted by TSM Training and Services Consultancy on 22/06/2023. The CHRA Report was in progress.	
3.	Medical Surveillance for 2023 was conducted for 10 estate workers on 02/08/2023 for workers exposed to n-hexane, pesticides and hazardous fumes. The medical surveillance was conducted at JPG Terrasolutions Sdn Bhd. The results indicated that all workers had no abnormal results that were occupational caused.	
4.	Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) Regulations 2019. The assessment was conducted by Kulim Safety Training and Services Sdn Bhd on 25/11/2021. The NRA Report (Report Number: HQ/18/PEB/00/00014-2021/031 was available for	

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

verification. Review of assessment has been conducted on 25/06/2023 with report no HQ/18/PEB/00/00014-2023/009.	
<ol> <li>Audiometric test was conducted by Kulim Safety Training and Services Sdn. Bhd for 8 estate workers on 24/09/2023.The results indicated No workers were diagnosed with Standard Threshold Shift (STS), 1 worker got Hearing Impairment and 1 worker have hearing loss and required to undergo retest within 3 months.</li> </ol>	
Tereh Palm Oil Mill	
<ol> <li>HIRARC has been review on 15/09/2023. Review HIRARC for FFB Ramp Conveyor, Boiler and Weighbridge. All work conducted at field included their PPE and control was according to HIRARC.</li> </ol>	
<ol> <li>Chemical Health Risk Assessment was done in compliance with USECHH Regulation 2000. The assessment was conducted by TSM Training and Services Consultancy on 01/06/2023. The CHRA Report was in progress.</li> </ol>	
<ol> <li>Medical Surveillance for 2023 was conducted for 46 mill workers (6 workers exposed by N-Hexane, 1 worker exposed on Pesticides and 39 workers for biological effect monitoring) and on 30/07/2023 for workers exposed to n-hexane, pesticides and hazardous fumes. The medical surveillance was conducted at JPG Terrasolutions Sdn Bhd. The results indicated that all workers had no abnormal results that were occupational caused.</li> </ol>	
<ol> <li>Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) Regulations 2019. The assessment was conducted by Kulim Safety Training and Services Sdn Bhd on 25/11/2021. The NRA Report (Report</li> </ol>	
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### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

Number: HQ/18/PEB/00/00014-2021/031 was available for verification. Review of assessment has been conducted on 25/06/2023 with report no HQ/18/PEB/00/00014-2023/009.	
5. Audiometric test was conducted by JPG Terrasolution Sdn. Bhd and PAC Testing & Consulting Sdn Bhd for 27 mill workers on 12/07/2023. The results indicated No workers were diagnosed with Standard Threshold Shift (STS), 1 worker got Hearing Impairment and 9 workers have NIHL and have hearing loss and required to undergo retest within 3 months. Retest has been conducted on 11/10/2023.	
<ol> <li>LEV Monitoring has been conducted. Refer Periodic Local Exhaust Ventilation Examination Report dated 22/11/2022 by Kulim Safety Training and Services Sdn Bhd. Report reference HQ/16/JHII/00/210-2022/083.</li> </ol>	
Sg Tawing Estate	
<ol> <li>HIRARC has been review on 25/08/2023. Review HIRARC for Fogging, Rotoslashing and Clinic . All work conducted at field included their PPE and control was according to HIRARC.</li> </ol>	
<ol> <li>Chemical Health Risk Assessment was done in compliance with USECHH Regulation 2000. The assessment was conducted by TSM Training and Services Consultancy on 31/05/2023. The CHRA Report was in progress.</li> </ol>	
3. Medical Surveillance for 2023 was conducted for 23 estate workers on 01/08/2023 for workers exposed to n-hexane, pesticides and hazardous fumes. The medical surveillance was conducted at JPG Terrasolutions Sdn Bhd. The results indicated that all workers had no abnormal results that were occupational caused.	

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

<ol> <li>Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) Regulations 2019. The assessment was conducted by Kulim Safety Training and Services Sdn Bhd on 20/12/2021. The NRA Report (Report Number: HQ/18/PEB/00/00014-2021/016 was available for verification.</li> </ol>	
<ol> <li>Audiometric test was conducted by Kulim Safety Training and Services Sdn. Bhd for 2 estate workers on 13/01/2023. The results indicated all workers have normal hearing. There is no abnormal result for all tested workers.</li> </ol>	
Selai Estate	
<ol> <li>HIRARC has been review on 25/06/2023. Review HIRARC for Water Treatment, Manuring and Rat Baiting. All work conducted at field included their PPE and control was according to HIRARC.</li> </ol>	
<ol> <li>Chemical Health Risk Assessment was done in compliance with USECHH Regulation 2000. The assessment was conducted by TSM Training and Services Consultancy on 30/05/2023. The CHRA Report was in progress.</li> </ol>	
3. Medical Surveillance for 2023 was conducted for 44 estate workers on 01/08/2023 for workers exposed to n-hexane, pesticides and hazardous fumes. The medical surveillance was conducted at Uniklinik Permas jaya. The results indicated that all workers had no abnormal results that were occupational caused.	
<ol> <li>Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) Regulations 2019. The assessment was conducted by Kulim Safety Training and Services Sdn Bhd on 21/12/2021. The NRA Report (Report</li> </ol>	
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#### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

		Number: HQ/18/PEB/00/00014-2021/017 was available for verification.	
		<ol> <li>Audiometric test was conducted by Kulim Safety Training and Services Sdn. Bhd for 8 estate workers on 13/01/2023. The results indicated all workers have normal hearing. There is no abnormal result for all tested workers.</li> </ol>	
		The JKKP-approved assessor (HQ/16/ASS/00/35) conducted the latest Chemical Health Risk Assessment (CHRA) on May and June 2023 for Tereh Palm Oil Mill certification units. The final version of the report for this CHRA is still pending until the Recertification Assessment is conducted. This OFI was raised to track the status of the report during the next assessment.	
3.6.2	<ul> <li>(C) The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</li> <li>- Critical (Major) compliance -</li> </ul>	Annual H&S plan established by each Operating Unit are mostly implemented through Annual Training Program 2020 to address the identified health and safety risks. The emphasis is on safe work by providing	Complied
		<ul> <li>Knowledge and skills needed to do their work safely and avoid creating hazards that could place themselves or others at risk.</li> </ul>	
		<ul> <li>Awareness and understanding of workplace hazards and how to identify, report, and control them.</li> </ul>	
		• Specialized training, when their work involves unique hazards.	
		Besides formal classroom training other means include on-the-job training and worksite demonstrations to effectively convey safety concepts, ensuring understanding of hazards and their controls, and promoting good work practices.	
		The safety performance of each Operating Unit is monitored via:	

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

		<ul> <li>Internal Audit conducted by the Kulim Head office Sustainability Palm Oil Department;</li> <li>Workplace inspection by site OSH Committee;</li> </ul>	
		• Direct involvement of supervisor and rounds by Asst Manager;	
		Safety occurrence reporting;	
		Health / medical surveillance;	
		Chemical exposure monitoring, and	
		The results of monitoring are discussed at meetings and informed to employees, and where applicable, appropriate corrective actions are taken.	
Criterio	n 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract w	vorkers are appropriately trained.	
3.7.1	<b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable account of the PSPOPSC in a form they understand and which includes	The Annual Training Program 2023 was established that covers mainly Health and Safety but extends to include all aspects of RSPO P&C and Supply Chain Certification Standard (SCCS).	Complied
	aspects of the RSPOP&C, in a form they understand, and which includes assessments of training. - Critical (Major) compliance -	Means implemented by Johor Plantations Berhad to assess understanding of participants include:	
		<ul> <li>Participants completing post-training evaluation/feedback form and give suggestions;</li> </ul>	
		Learners engagement such as interactive quizzes;	
		• Knowledge acquisition and behavioural application rated by immediate supervisor at workplace post training attended.	
		Workers interviewed was conducted and demonstrated comprehension of the RSPO, various subsidiary policies, their job SOPs, consequences for deviation, the importance of wearing PPE, proficiency in donning and changing PPE, familiarity with fire	

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Page 61 of 171

#### **RSPO P&C Public Summary Report**

#### Revision 15 (Nov 2023)

		extinguisher usage, understanding workplace hazards, recognizing risks, implementing necessary control measures, and adhering to Covid-19 Safe Practices, among other aspects.	
3.7.2	Records of training are maintained. - Minor Compliance -	Training records are maintained by each Operating Unit. Sample some records at each Operating as follows:	Complied
		Tereh Selatan Estate	
		Training Date	
		Manuring Application 10/06/2023	
		Harvesting Training 16/08/2023	
		Spraying Calibration Training 16/05/2023	
		Schedule Waste Training 14/03/2023	
		Chemical Mixing 29/09/2023	
		ERP and Fire Fighting Training 12/10/2023	
		First Aid Training 17/10/2023	
		Triple Rinsing Training 03/08/2023	
		Rat Baiting Training 08/09/2023	
		IPM Training 16/03/2023	
		Rengam Estate	

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### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

_	11	
Training	Date	
Spraying Technique Training	08/06/2023	
Schedule waste management	02/02/2023	
Fertilizer Handling and Spill containment	19/03/2023	
Chemical Handling and Spill containment	18/05/2023	
ERP and CPR Training	21/08/2023	
First Aid Training	04/10/2023	
Triple rinsing	12/05/2023	
SDS Training	18/05/2023	
Lubricant & Fuel Handling Training	18/04/2023	
Safe Driving for MB & Tractor	18/05/2023	
Tereh Palm Oil Mill		
Training	Date	
Chemical handling	02/10/2023	
ERP & CPR Training	05/03/2023	

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

First Aid Training	01/10/2023
Tractor & Lorry safe training	12/10/2023
PPE Usage Training	09/10/2023
Working at Height	29/09/2023
Water Treatment training	16/07/2023
Effluent sampling training	21/05/2023
Grading Training	12/09/2023
LOTO Training	29/09/2023
Sg Tawing Estate	
Training	Date
Manuring Application	03/03/2023
Harvesting	17/03/2023
Spraying & PPE Usage	10/04/2023
Spraying Calibration	10/04/2023
Chemical Handling	14/02/2023

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

ERP & CPR Training	02/04/2023
First Aid Training	18/05/2023
Tractor, Lorry & MB Safe Driving	02/02/2023
Triple Rinsing	08/01/2023
Safety Work Diesel tank	19/03/2023
Selai Estate	
Training	Date
Manuring at buffer zone	19/05/2023
Harvesting training	17/08/2023
Spraying calibration	12/09/2023
Spill containment	12/05/2023
Fertilizer handling	13/02/2023
Chemical handling	10/04/2023
Fire Drill Training	27/10/2023
ERP & CPR Training	15/06/2023

#### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

			1	
		Safety work at Chemical store	15/06/2023	
		Triple rinsing	10/04/2023	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed. - Minor Compliance -	Supply chain training carried out for perso tasks critical to the effective implementatio Certification Standard (SCCS). Training con- attended by Mill representatives.	n of the Supply Chain	Complied
	n 3.8: Supply chain requirement for mills			
(note: A	Il supply chain requirements are considered as <b>Critical (C)</b> . However, it will i	not contribute to suspension if there is more th	nan 5 non-compliance w	vithin a principle)
3.8.1	Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.	Tereh Palm Oil Mill only receives certified FFE supply base. Therefore, Tereh Palm Oil I Preserved supply chain system and mod assessment, the audit team verified the vo certified FFB entering the mill, the implement controls and volume sales of RSPO certified	Mill uses the Identity lule. During the P&C olumes and sources of entation of processing	Complied
3.8.2	Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	Tereh Palm Oil Mill only receives certified F supply base. Therefore, qualifies for the Ide chain system and module. Hence this indica	ntity Preserved supply	Not Applicable

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**RSPO P&C Public Summary Report** 

#### Revision 15 (Nov 2023)

3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. Summary of CPO and PK production for the assessment period is available in table 10 of this summary report.	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization, PalmTrace. The registration of PalmTrace will be carried out by the Marketing Department in HQ. Company has registered in PalmTrace system as follows:	Complied
		Member Name: Johor Plantations Berhad Tereh Palm Oil Mill	
		Palm Trace ID: RSPO_AC10000001292	
		Members ID: RSPO_PO1000001263	
		Member category : Oil Mill	
		Licence status: 31/01/2023 – 22/01/2024	
3.8.5	<ul> <li>Documented procedures</li> <li>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:</li> <li>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> </ul>	<ul> <li>a) Tereh Palm Oil Mill shall have written procedures to ensure the implementation of all elements of the applicable supply chain model specified. The SCCS Operations are guided by 2 operating procedures which is Mahamurni Plantations Sdn Bhd; Procedure Title: CSPO &amp; CSPK Supply Chain; Procedure No: MKTG 04; Document Date: January 2021; Revision; 02 and Sustainable Management system – Traceability; Document Number: SQD/SMS/2.1; Document Date: 17/02/2022; Issue No: 01; Rev Number; 06.</li> </ul>	Complied

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

	<ul> <li>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.</li> <li>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</li> </ul>	<ul> <li>b) Seen the records that included in the procedure are as below Weighbridge tickets, Training records, Internal audit report, Invoice and contracts, Delivery and storage records and Daily Production Report. Training records for RSPO Supply Chain &amp; Stamping was sighted where the training was conducted on 05/03/2023 for the critical control point responsible person such as Weighbridge Operators and Security Guards. Seen the attendance list and interviewed with the attendees confirmed that they are understand the procedure.</li> </ul>	
		c) Head of each operating unit appointed as person responsible for all certification inclusive of RSPO SCCS. Responsibility of the person-in-charge has clearly stated in the appointment letter, SID/SD/ADMIN/047/23 dated 08/09/2023.	
		Tereh Palm Oil Mill has developed Sustainable Management system – Traceability; Document Number: SQD/SMS/2.1; Document Date: 17/02/2022; Issue No: 01; Rev Number; 06, which has covered the process of incoming of FFB and ensuring no contamination in the IP mill.	
3.8.6	<ul> <li>Internal Audit <ul> <li>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</li> <li>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>b. Effectively implements and maintains the standard requirements within its organisation.</li> <li>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</li> </ul> </li> </ul>	Tereh Palm Oil Mill has a written procedure to conduct annual internal audit to determine whether the mill Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents and Effectively implements and maintains the standard requirements within its organisation. Refer Internal Audit Procedure (Doc. No.: SQD/SMS/3.2, Issue No.: 1, Rev. No.: 0 dated 01/08/2020) where the objective is to ensure that the implementation of company's RSPO, ISCC and MSPO management system is in line with the policies, procedures and other requirements. The frequency of the internal audit to be carried out is at least once within 12 months (before expiry of the certificate).	Complied

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**RSPO P&C Public Summary Report** 

#### Revision 15 (Nov 2023)

	review at least annually. The mill shall maintain the internal audit records and reports.	The latest internal audit was carried out on 11/07/2023 by SQD team. There no non-conformance was raised based on Internal Audit Report. All the clauses in RSPO SCCS and RSPO Market Communications and Claims were covered during the audit.	
3.8.7	<ul> <li>Purchasing and Goods In</li> <li>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</li> <li>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</li> <li>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</li> </ul>	Tereh Palm Oil Mill maintain the daily records of all certified FFB received and documented in daily processing records. The records include the FFB suppliers, weight, and vehicle transportation details. The mill has maintained records of FFB received such as Delivery Notes and Weighbridge operator. Sample of FFB delivery records: Incoming FFB Sample 1 Company: Johor Plantation Berhad	Complied
		<ul> <li>Estate: Selai Estate</li> <li>Certified No: RSPO 613086</li> <li>Date: 29/07/2023</li> <li>Ticket Number: 183XXX</li> <li>Vehicle Number: WEJ19XX</li> <li>Field / Block: P13/2E</li> <li>FFB Weight: 8.00 MT</li> </ul>	
		<ul> <li>Sample 2</li> <li>Company: Eng Lee Heng Trading Sdn Bhd</li> <li>Estate: Eng Lee Heng Trading Sdn Bhd</li> <li>Certified No: RSPO 660787</li> <li>Date: 24/09/2023</li> <li>Ticket Number: 189XXX</li> <li>Vehicle Number: 189XXX</li> <li>Field / Block: P08</li> <li>FFB Weight: 17.43 MT</li> </ul>	

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### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

<ul> <li>3.8.8 Sales and Goods Out The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation): <ul> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ul> </li> </ul>	<ul> <li>CPO - IP</li> <li>a) The name and address of the buyer; IXXXXXXX SXXXXXX Fats Sdn Bhd</li> <li>b) The name and address of the seller; Tereh Palm Oil Mill</li> <li>c) The loading or shipment / delivery date; 26/09/2023</li> <li>d) The date on which the documents were issued; 26/09/2023</li> <li>e) RSPO Certificate Number: RSPO 613086</li> <li>f) A description of the product: CPO Identity Preserve</li> <li>g) The quantity of the products delivered; 44.14 Mt</li> <li>h) Any related transport documentation; JUP19XX</li> <li>i) A unique identification number: C094XX</li> </ul>	Complied
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### RSPO P&C Public Summary Report

#### Revision 15 (Nov 2023)

		<ul> <li>f) A description of the product: PK Identity Preserve</li> <li>g) The quantity of the products delivered; 44.53 Mt</li> <li>h) Any related transport documentation; VEN32XX</li> <li>i) A unique identification number: K024XX</li> </ul>	
3.8.9	<ul> <li>Outsourcing Activities</li> <li>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</li> <li>ii) The mill shall ensure the following: <ul> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> <li>b) The mill has an agreement or contract covering the outsourced process with each 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.</li> <li>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</li> </ul> </li> </ul>	<ul> <li>Tereh Palm Oil Mill has established Standard Operating Procedure related Outsourcing Activities. Refer Traceability Procedure dated 17/02/2022 with reference number SQD/SMS/2.1 Section 6.9 Outsourced Activity.</li> <li>i. Stated in the SOP, CPO mill cannot outsource processing activities like refining or crushing. Outsourcing activities for Tereh Palm Oil Mill was for CPO and PK transportation.</li> <li>ii. Sighted the contract agreement between Johor Plantations Berhad and contractor;</li> <li>a) Tereh Palm Oil Mill has legal ownership of all input material to be included in the outsourced process. Refer listing of FFB Supplier Certified and Non-Certified. The contract agreement and details like MPOB licence were kept in the file.</li> <li>b) There is 7 transporter assigned by Mill for CPO. PK transport will be assigned by buyer. Refer Sampel Contract Agreement between Johor Plantations Berhad and Transporter as below:</li> <li>TXX TXXX KXXX Sdn. Bhd. – Agreement on the Transportation of Crude Palm Oil (CPO) From Johor Plantations Berhad Group Mills To Various Refineries; Initial term: 13 months commencing from 01/06/2023 to 30/06/2024.</li> </ul>	t

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

		<ul> <li>PXXXXXXXX OXXXXXXX Sdn. Bhd. – Agreement on the Transportation of Crude Palm Oil (CPO) From Johor Plantations Berhad Group Mills To Various Refineries; Initial term: 13 months commencing from 01/06/2023 to 30/06/2024.</li> <li>FXXX LXXXXXXX Sdn. Bhd. – Agreement on the Transportation of Crude Palm Oil (CPO) From Johor Plantations Berhad Group Mills To Various Refineries; Initial term: 13 months commencing from 01/06/2023 to 30/06/2024.</li> <li>SXXXX SXXX Sdn. Bhd. – Agreement on the Transportation of Crude Palm Oil (CPO) From Johor Plantations Berhad Group Mills To Various Refineries; Initial term: 13 months commencing from 01/06/2023 to 30/06/2024.</li> <li>SXXXX SXXXX Sdn. Bhd. – Agreement on the Transportation of Crude Palm Oil (CPO) From Johor Plantations Berhad Group Mills To Various Refineries; Initial term: 13 months commencing from 01/06/2023 to 30/06/2024.</li> <li>C) The mill trades CSPO and CSPK with its buyers among refineries and/or oleo-chemical plants. Based on agreements, transporter has no ownership of transported</li> </ul>	
		products and owned by buyer. The contract agreements specified that all transporters are required to fulfil and comply with applicable legal requirements. Refer Section 16.4.	
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.	Tereh Palm Oil Mill mill has record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products. Refer Stakeholder List dated August 2023.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	No change of names and contract details of transporter for the physical handling of RSPO certified oil palm products. The mill ae	Complied

### RSPO P&C Public Summary Report

#### Revision 15 (Nov 2023)

		aware that the CB are to be informed if there are any changes of updates.	
3.8.12	<ul> <li>Record keeping</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>For Mass Balance Module, the mill: <ul> <li>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</li> <li>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.</li> <li>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.</li> </ul> </li> </ul>	<ol> <li>The mill has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these Sustainability Management System as below:         <ul> <li>Dispatch of CPO/PK delivery order</li> <li>Daily Production Report</li> <li>FFB Dispatch Report from supplying estate</li> <li>Training records</li> <li>FFB Transaction records</li> </ul> </li> <li>Traceability Procedure (Doc. No.: SQD/SMS/1.2, Issue No. 1, Rev. No.: 05 dated 1/8/20, the records retention for all RSPO Supply Chain related records to be retained for a minimum of 5 years' period.</li> <li>Records and balance of all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK monitored on a real- time basis on daily/monthly production figure.</li> <li>N/A due to module of Tereh Palm Oil Mill was IP.</li> </ol>	Complied
3.8.13	Extraction Rate 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	Conversion factor of CPO and PK production is depending on the actual OER and KER. Extraction average as per Table 10.	Complied

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RSPO P&C Public Summary Report Revision 15 (Nov 2023)

	extraction rates based upon past experience, documented and applied it consistently.		
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Complied
3.8.15	Processing 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.	No incoming of uncertified FFB and mill only process RSPO certified FFB from Kulim (M) Berhad group estates. Hence there are no uncertified products being produced, stored or transported for this certification unit.	Complied
3.8.16	<ul> <li>Registration of Transactions</li> <li>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.</li> <li>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.</li> </ul>	Shipping announcement in the RSPO IT platform carried out by the mills when RSPO certified products are sold as certified to refineries. Details of transaction summarized under Table 11.	Complied
3.8.17	Claims 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.	Johor Plantations Berhad has obtained Trademark License from RSPO and seen the trademark license. The facility is aware with the requirements of the RSPO Rules on Market Communications and Claims. Licence Number: 1-0080-09-100-00 Validity: 08/08/2023 until 07/08/2025	Complied
Genera	I corporate communications		
4.1	A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives		Complied

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Page 74 of 171

**RSPO P&C Public Summary Report** 

#### Revision 15 (Nov 2023)

	and principles of RSPO. Corporate communication is a "non-product related" claim.	and annual report with the use of trademark logo. Johor Plantations Berhad has obtained Trademark License from RSPO and seen the trademark license# 1-0080-09-100-00 which valid from 08/08/2023 until 07/08/2025 for IP Model for Tereh Palm Oil Mill. The facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	
4.2	In corporate communications, a member is allowed to: A. display its RSPO membership status B. display the RSPO web address (www.rspo.org) C. state that the member supports the work of RSPO D. state the member's history with regard to RSPO E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership	Johor Plantations Berhad has stated the member's history with regard to RSPO in the company's website and annual report with the use of trademark logo. Johor Plantations Berhad has obtained Trademark License from RSPO and seen the trademark license# 1-0080-09-100-00 which valid from 08/08/2023 until 07/08/2025 for IP Model for Tereh Palm Oil Mill. The facility is aware with the requirements of the RSPO Rules on Market Communications and Claims. The use of trademark logo were in compliance with the RSPO Trademark License.	Complied
4.3	Members are <b>not allowed</b> to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	Johor Plantations Berhad has stated the member's history with regard to RSPO in the company's website and annual report with the use of trademark logo. Johor Plantations Berhad has obtained Trademark License from RSPO and seen the trademark license# 1-0080-09-100-00 which valid from 08/08/2023 until 07/08/2025 for IP Model for Tereh Palm Oil Mill. The facility is aware with the requirements of the RSPO Rules on Market Communications and Claims. The use of trademark logo were in compliance with the RSPO Trademark License.	Complied
4.4	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 palm oil products.	The communication that made via website is consistent, clear and does not mislead the consumer and stakeholders as to the certified content of oil palm products in their own products.	Complied

**RSPO P&C Public Summary Report** 

#### Revision 15 (Nov 2023)

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4.5	<ul> <li>Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include: <ul> <li>"We have been sourcing RSPO certified palm oil since (YEAR)."</li> <li>"We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year."</li> <li>"We have been RSPO certified since (YEAR)."</li> <li>"We have been RSPO certified since (YEAR)."</li> <li>"We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil."</li> <li>"In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified."</li> <li>"Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits."</li> <li>"We are RSPO certified. Ask us for our RSPO certified products."</li> </ul> </li> </ul>	The company does not make any statement that may misleading to the consumers to believe that RSPO membership by itself implies that selling of RSPO-certified oil palm products by verified through the website.	Complied
4.6	RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following: A. Use the RSPO Trademark with a valid trademark licence number to promote its membership of RSPO. It is sufficient for non-certified members to indicate this only once in their communication. B. Claim statements are limited to the following examples: i. "The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR)." ii. X% of palm oil sourced by our organisation are certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as (a) Identity Preserved, (b) Segregated, (c) Mass Balance, or (d) Book and Claim. C. In cases wherein an organisation/member would like to indicate their commitment to sourcing RSPO certified volumes, the statement shall be accompanied with a disclaimer: "This reported figure is not audited through RSPO Certification".	Johor Plantations Berhad has stated the member's history with regard to RSPO in the company's website and annual report with the use of trademark logo. Johor Plantations Berhad has obtained Trademark License from RSPO and seen the trademark license# 1-0080-09-100-00 which valid from 08/08/2023 until 07/08/2025 for IP Model for Tereh Palm Oil Mill. The facility is aware with the requirements of the RSPO Rules on Market Communications and Claims. The use of trademark logo were in compliance with the RSPO Trademark License.	Complied

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### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

Produc	Product-specific communications				
5.1 Ge	neral				
5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	No packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.	Complied		
5.1.2	Product-specific communications are voluntary.	No Product-specific communications are being made by the UoC.	Complied		
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	There is no RSPO Label is displayed for product specific communication from Johor Plantations Berhad.	Complied		
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that the product is CSPO (IP) with RSPO certificate number.	Complied		
5.1.5	If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below • RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field. • Both parties shall inform their certification body in writing about the agreement. • The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer.	Tereh Palm Oil Mill is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable		

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### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain	Tereh Palm Oil Mill is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable
<b>5.2 Off</b>	pack claims Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.	<ul> <li>Tereh Palm Oil Mill ensured the required information is available in document form. Outgoing records of CPO and PK were verified as below:</li> <li>CPO - IP</li> <li>j) The name and address of the buyer; IXXXXXXX SXXXXXX Fats Sdn Bhd</li> <li>k) The name and address of the seller; Tereh Palm Oil Mill</li> <li>l) The loading or shipment / delivery date; 26/09/2023</li> <li>m) The date on which the documents were issued; 26/09/2023</li> <li>n) RSPO Certificate Number: RSPO 613086</li> <li>o) A description of the product: CPO Identity Preserve</li> <li>p) The quantity of the products delivered; 44.14 Mt</li> <li>q) Any related transport documentation; JUP19XX</li> <li>r) A unique identification number: C094XX</li> <li>PK - IP</li> <li>j) The name and address of the seller; Tereh Palm Oil Mill</li> <li>l) The loading or shipment / delivery date; 05/10/2023</li> </ul>	Complied

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**RSPO P&C Public Summary Report** 

#### Revision 15 (Nov 2023)

		<ul> <li>m) The date on which the documents were issued; 05/10/2023</li> <li>n) RSPO Certificate Number: RSPO 613086</li> <li>o) A description of the product: PK Identity Preserve</li> <li>p) The quantity of the products delivered; 44.53 Mt</li> <li>q) Any related transport documentation; VEN32XX</li> </ul>	
5.2.2	When confirming the sale of certified palm oil 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.	A unique identification number: K024XX Tereh Palm Oil Mill ensured the required information is available in document form. Outgoing records of CPO and PK were verified as below: CPO - IP s) The name and address of the buyer; IXXXXXXXX SXXXXXX Fats Sdn Bhd t) The name and address of the seller; Tereh Palm Oil Mill u) The loading or shipment / delivery date; 26/09/2023 v) The date on which the documents were issued; 26/09/2023 w) RSPO Certificate Number: RSPO 613086 x) A description of the product: CPO Identity Preserve y) The quantity of the products delivered; 44.14 Mt z) Any related transport documentation; JUP19XX aa) A unique identification number: C094XX PK - IP	Complied
		<ul> <li>r) The name and address of the buyer; PXXX OXX Mill Sdn Bhd</li> <li>s) The name and address of the seller; Tereh Palm Oil Mill</li> <li>t) The loading or shipment / delivery date; 05/10/2023</li> <li>u) The date on which the documents were issued; 05/10/2023</li> <li>v) RSPO Certificate Number: RSPO 613086</li> <li>w) A description of the product: PK Identity Preserve</li> <li>x) The quantity of the products delivered; 44.53 Mt</li> <li>y) Any related transport documentation; VEN32XX</li> </ul>	

RSPO P&C Public Summary Report

#### Revision 15 (Nov 2023)

		A unique identification number: K024XX	
5.2.3	Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options:	Not applicable since Tereh Palm Oil Mill is not under distributor or wholesaler category.	Not Applicable
	<ul> <li>If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil 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 products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation.</li> <li>If the distributor or wholesaler is supply chain certified, they should</li> </ul>		
5 2 On	follow the requirements outlined in section 5.2.2. pack claims		
5.5 01	-		
5.3.1	Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.	There is no On Pack Claim by mill since they produce only raw product which is CPO and PK only. Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.	Not Applicable
5.3.2	In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:	There is no On Pack Claim by mill since they produce only raw product which is CPO and PK only. Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.	Not Applicable
	A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:		
	<ul> <li>RSPO IP/SG CERTIFIED*</li> <li>Contains RSPO IP/SG palm oil*</li> <li>Contains RSPO certified palm oil (IP/SG)*</li> </ul>		

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### RSPO P&C Public Summary Report

#### Revision 15 (Nov 2023)

	*Add RSPO TM Licence Number below or next to the claim.		
	<ul> <li>B) or Mass Balance (MB) Certified Products: <ul> <li>RSPO MIXED*</li> <li>Contributes to the production of RSPO certified palm oil*</li> <li>Contains RSPO certified palm oil (MB)*</li> </ul> </li> <li>*Add RSPO TM Licence Number below or next to the claim.</li> </ul>	There is no On Pack Claim by mill since they produce only raw product which is CPO and PK only. Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.	Not Applicable
	<ul> <li>C) For Partially Certified Products:</li> <li>RSPO 50% MIXED*</li> <li>Contains at least 50% RSPO certified palm oil*</li> <li>*Add RSPO TM Licence Number below or next to the claim.</li> </ul>	There is no On Pack Claim by mill since they produce only raw product which is CPO and PK only. Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.	Not Applicable
	<ul> <li>D) For Products covered with Book and Claim (B&amp;C):</li> <li>RSPO CREDITS*</li> <li>Supports the production of RSPO certified palm oil*</li> <li>Contains palm oil covered by the purchase of RSPO Credits*</li> <li>*Add RSPO TM Licence Number below or next to the claim.</li> </ul>	There is no On Pack Claim by mill since they produce only raw product which is CPO and PK only. Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.	Not Applicable
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	There is no On Pack Claim by mill since they produce only raw product which is CPO and PK only. Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.	Not Applicable
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	There is no On Pack Claim by mill since they produce only raw product which is CPO and PK only. Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.	Not Applicable



**RSPO P&C Public Summary Report** 

#### Revision 15 (Nov 2023)

5.3.5	Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient.	There is no On Pack Claim by mill since they produce only raw product which is CPO and PK only. Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.	Not Applicable
5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	There is no On Pack Claim by mill since they produce only raw product which is CPO and PK only. Not applicable as no packings required for the mill products as deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO IP and PK IP.	Not Applicable
MODUL	E A – IDENTITY PRESERVED		
	95% of the palm oil content must be RSPO IP certified.	Oil palm content is 100% CPO and claim as RSPO IP-certified.	Complied
	If 100% of RSPO IP certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	Oil palm content is 100% CPO and claim as RSPO IP-certified. All infeed material (FFB) is RSPO certified.	Complied
Messag	ing		
	<ul> <li>Messaging ALLOWED for storytelling in product-specific communications may include any of the following elements: <ul> <li>The palm oil products contained in this product have been certified to come from RSPO sources. www.rspo.org</li> <li>By choosing this product, you are sure that it contains RSPO certified palm oil. For more information: www.rspo.org</li> <li>RSPO certified sustainable palm oil products were kept apart from other palm oil products throughout the supply chain.www.rspo.org</li> <li>Certified sustainable palm oil products can be traced back to RSPO certified mills and plantations. www.rspo.org</li> </ul> </li> </ul>	Tereh Palm Oil Mill is producing crude palm product and does not involved in any "messaging". Therefore, this indicator was not applicable.	Not Applicable

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RSPO P&C Public Summary Report Revision 15 (Nov 2023)

Product	<ul> <li>The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org</li> <li>RSPO certified sustainable palm oil has been produced according to stringent environmental and social criteria. www.rspo.org</li> <li><b>t-Specific Communications Labelling</b></li> <li>Members are allowed to use the RSPO Label in one of the following ways:</li> </ul>	Tereh Palm Oil Mill is producing crude palm product and does not	Not Applicable
	<ul> <li>RSPO Trademark that includes the tag "CERTIFIED"; or</li> <li>RSPO Trademark that includes the tag "This product contains certified sustainable palm oil".</li> </ul>	involved in any labelling of end-product. Therefore, this indicator was not applicable.	
Princip	le 4: Respect community and human rights and deliver benefits		
Criterio	n 4.1: The unit of Certification respects human rights, which includes resp	ecting the rights of Human Rights Defenders.	
4.1.1	<ul> <li>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</li> <li>Critical (Major) compliance -</li> </ul>	Kulim (Malaysia) Berhad has a Sustainability Policy which signed by the Managing Director on 1/10/2020. The policy which among others, states it commitment to respect, support and protect international human rights against violence, threats, all forms of retaliation, and effective elimination of all forms of violation of human rights which include against HRD, whistle-blowers, complainants and community spokespersons. The policy is provided in either English or Bahasa Malaysia, or both to relevant external stakeholders. Translated policy briefed to internal stakeholders among foreign workers by each countries	Complied
		workers' representatives. Briefing to all workers was conducted from time to time during daily morning muster assembly.	
		While for stakeholders, communication of the policy has been done during the stakeholders meeting conducted on 21/09/2023 with attendance of all stakeholders from the central region. The meeting involved the management of all estates and mill within Tereh Complex and attended by external stakeholders among local	

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Page 83 of 171

### **RSPO P&C Public Summary Report**

#### Revision 15 (Nov 2023)

4.1.2	The unit of certification does not instigate violence or use any form of		Complied
	harassment in their operations. - Minor compliance -	violence or harassment in the operations and align with the policy established in the document "sustainability policy". It has been confirmed with records and interview with the workers itself.	
Criteri	on 4.2: There is a mutually agreed and documented system for dealing with	complaints and grievances, which is implemented and accepted by all	affected parties
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	Berhad which documented in SOPs title Grievance document number SQD/SMS/4.1 dated 01/08/2023 issuance #01. As per stated in procedure that the management of each operating units will allow for involvement of independent legal, technical advice and third parties mediator. In the SOPs has outline the process flow for any complaint/grievances which started from complaint received by immediate executive and supervisor as 1 <sup>st</sup> steps. If the complaint unable to be resolved within 10 days, the complaint will be escalated to Department general manager/manager/ assistant or executive in-charge and step 3 within 7 days if the issues have not been resolved, the issues need to be escalated to Division/department director.	Complied
		Stated in clause 5.8, that the management will respect and protect anonymity of the complainant.	
		As per sustainability policy stated commitment of Johor Plantation Berhad to respect, support and protect international human rights against violence, threats and all form of retaliation and contribute to the effective eliminations of all forms of violations of human rifhrs and fundamental freedom of individuals and people including the	

**RSPO P&C Public Summary Report** 

#### Revision 15 (Nov 2023)

		human rights defenders. Whistle blower, complainants and community spokespersons.	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	There is evidence that the procedure is in place which has been communicated to all workers during morning muster call and posted at the notice board. It has been further confirmed during site visit and interview with the workers where they can demonstrate their understanding on the procedure.	Complied
		There is no illiterate parties that has been identified for the sample estates. While for stakeholders, communication of the procedure has been done during the stakeholders meeting conducted on 21/09/2023 with attendance of all stakeholders from the central region.	
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	Sample of 15 complaint has been taken and verified at all operating units which has been received in year 2022 and 2023 regards to the housing compound. There is evidence that both complaints has been responded on timely manner. There is no complaint has been received for other operating units. For housing repair, all operating units maintained logbook for housing repair book. There is evidence that all housing repair report has been responded and as per timeline has been mentioned in the SOPs.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	There are systems that has been established by Johor Plantations Berhad which documented in SOPs title Grievance document number SQD/SMS/4.1 dated 01/08/2023 issuance #01 which clearly stated that there is always options for involvement of independent legal, technical advice and third parties mediator.	Complied
Criterio	on 4.3: The unit of Certification contributes to local sustainable developmen	It as agreed by local communities.	
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated.	There is evidence that contribution has been made by the management to stakeholder's base on consultation or request. As per interviewed with stakeholders, they are aware that any	Complied
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#### **RSPO P&C Public Summary Report**

#### Revision 15 (Nov 2023)

	- Minor compliance -	<ul> <li>contribution can be requested to the management for each operating unit. Sample of contribution that has been made.</li> <li>1. Contribution to SMK Seri Kota Paloh for sports event, and program Sekolah Penyayang dated 02/07/2023.</li> <li>2. Contribution in assisting SMK Seri Kota Paloh with vehide for an event.</li> <li>3. Donation to SK Ladang Tereh on 06/02/2023 for appreciation ceremony and closing for national days ceremony, cricket tournament,</li> </ul>	
Criterio	<b>n 4.4:</b> Use of the land for oil palm does not diminish the legal, customary	or user rights of other users without their free, prior and informed cons	sent.
4.4.1	<ul> <li>(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.</li> <li>Critical (Major) compliance -</li> </ul>	ownerships or lease. Details as per below	Complied

**RSPO P&C Public Summary Report** 

#### Revision 15 (Nov 2023)

		<ul> <li>Ownership reference#562232, Lot#3892 total hectarage 356.30Ha</li> <li><u>Sungai Tawing Estate</u></li> <li>There is only 1 land title for Sungai Tawing Estate, which is H.S.(D) 6060 PTD2137 total 2225.7675 owned by Sindora Berhad one of subsidiaries company for Johor Plantation Berhad.</li> </ul>	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	There is no land dispute in all estates and mill within Tereh complex since last audit. The land belongs to Kulim (M) Berhad as per land ownership documents verified. Interview conducted with the local community representatives also confirmed this.	Complied
		In case of any arising land dispute, the process will be handled based on the procedure for Land Encroachment; Doc. # PROP/MP/5; Date: 9/6/2020; Rev. # 4. Hence, this indicator is not applicable.	
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.	There is no land dispute in all estates and mill within Tereh complex since last audit. The land belongs to Kulim (M) Berhad as per land ownership documents verified. Interview conducted with the local community representatives also confirmed this.	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 -	In case of any arising land dispute, the process will be handled based on the procedure for Land Encroachment; Doc. # PROP/MP/5; Date: 9/6/2020; Rev. # 4.	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	There is no land dispute in all estates and mill within Tereh complex since last audit. The land belongs to Kulim (M) Berhad as per land	Complied



RSPO P&C Public Summary Report

#### Revision 15 (Nov 2023)

	status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	ownership documents verified. Interview conducted with the local community representatives also confirmed this.	
4.4.3	<b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	In case of any arising land dispute, the process will be handled based on the procedure for Land Encroachment; Doc. # PROP/MP/5; Date: 9/6/2020; Rev. # 4. Based on the map and stakeholders consultation, there is no evidence of any local community land involved. Therefore, this indicator is not applicable.	Not Applicable
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	There is no land dispute in all estates and mill within Tereh complex since last audit. The land belongs to Kulim (M) Berhad as per land ownership documents verified. Interview conducted with the local community representatives also confirmed this.	Complied
4.4.5	<ul> <li>(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.</li> <li>- Critical (Major) compliance -</li> </ul>	There is no evidence of any local community land involved. In case of any arising land dispute, the process will be handled based on the procedure for Land Encroachment; Doc. # PROP/MP/5; Date: 9/6/2020; Rev. # 4. Hence, this indicator is not applicable.	Not Applicable
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	There is no land dispute in all estates and mill within Tereh complex since last audit. The land belongs to Kulim (M) Berhad as per land ownership documents verified. Interview conducted with the local community representatives also confirmed this.	Complied
Criteric This is c	on 4.5: No new plantings are established on local peoples' land where it ca dealt with through a documented system that enables these and other stake	n be demonstrated that there are legal, customary or user rights, wit holders to express their views through their own representative institu	hout their FPIC. Itions.
4.5.1	<ul> <li>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</li> <li>- Critical (Major) compliance -</li> </ul>	<ul> <li>There is no new planting in the Tereh Palm Oil Mill Supply bases.</li> <li>There is evidence of land title for each operating units to show legal ownerships or lease. Details as per below</li> <li><u>Tereh Selatan Estate</u></li> <li>Land title H.S. (D) 5655, PTD3504 total 1210.32 for agriculture</li> </ul>	Complied

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

		<ul> <li>Land title H.S. (D) 5658, total 3.7332Ha leased 99 years until 27/08/2078.Land used for oil palms</li> </ul>	
		• Land title H.S. (D) 5657, total 130.4478Ha leased for 99 years until 27/08/2078 for oil palm plantaytions	
		<ul> <li>Land title H.S.(D) 5660, PTD 4609 leased for 99 years until 27/08/2078.</li> </ul>	
		• Land title H.S.(D) 6061, PTD 3509, total 607.0275Ha	
		Selai Estate	
		There are 2 land titles has been verified which under the ownerships of Selai Sdn Bhd which is one of subsidiaries company under Johor Plantations Berhad.	
		Ownership reference#562233, Lot#2838 total hectarage 3179Ha registered November 2017	
		Ownership reference#562232, Lot#3892 total hectarage 356.30Ha	
		Sungai Tawing Estate	
		There is only 1 land title for Sungai Tawing Estate, which is H.S.(D) 6060 PTD2137 total 2225.7675 owned by Sindora Berhad one of subsidiaries company for Johor Plantation Berhad.	
4.5.2	<b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local	No new planting and issues of customary land occurred in all operating units under Tereh Complex a that requires FPIC process since the last audit.	Complied
	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.	It was verified via Global Risk Assessment Services System (GRASS), a system that monitors new development and changes on changes of landscape via satellite images, that there was no new development in all operating units under Tereh Complex in the past	
	- Critical (Major) compliance -	recent years.	

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**RSPO P&C Public Summary Report** 

#### Revision 15 (Nov 2023)

		The estate's land statement was verified to have no additional changes to the planted area. This was cross checked against the previous year's land statements and MPOB License	
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -	operating units under Tereh Complex a that requires FPIC process since the last audit.	Complied
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -	It was verified via Global Risk Assessment Services System (GRASS), a system that monitors new development and changes on changes of landscape via satellite images and interview with local communities and neighbouring estate, that there was no new development in all operating units under Tereh Complex in the past recent years.	Complied
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -		Complied
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	No new planting and issues of customary land occurred in all operating units under Tereh Complex a that requires FPIC process since the last audit.	Complied



**RSPO P&C Public Summary Report** 

#### Revision 15 (Nov 2023)

4.5.7	New lands are not acquired for plantations and mills after 15 November	It was verified via Global Risk Assessment Services System	Complied
1.3.7	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.	(GRASS), a system that monitors new development and changes on changes of landscape via satellite images, that there was no new development in all operating units under Tereh Complex in the past	Complicu
	- Minor compliance -	recent years.	
4.5.8	<ul> <li>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</li> <li>- Critical (Major) compliance -</li> </ul>	The estate's land statement was verified to have no additional changes to the planted area. This was cross checked against the previous year's land statements, MPOB License and interview with local communities and neighbouring estate.	Complied
	<b>n 4.6:</b> Any negotiations Concerning compensation for loss of legal, customa local communities and other stakeholders to express their views through the stakeholders to express their views through the stakeholders to express to express the stakeholders to express the stakeholders t		ables indigenous
4.6.1	<ul> <li>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</li> <li>Critical (Major) compliance -</li> </ul>	Procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation is in place and is contained in the SPO Negotiations Concerning Compensation Program dated 4/9/2007. This procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly.	Complied
4.6.2	<ul> <li>(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.</li> <li>Critical (Major) compliance -</li> </ul>	An SOP known as Negotiations Concerning Compensation Program dated 4/9/2007 was established by Kulim (Malaysia) Berhad to identify legal and customary rights as well as people entitled to compensation as per procedure in place and is contained in the SPO Negotiations Concerning Compensation Program dated 4/9/2007. The procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly.	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.	Tereh Complex does not have scheme smallholders within its certification unit Thus, this indicator is not applicable.	Not Applicable

### **RSPO P&C Public Summary Report**

#### Revision 15 (Nov 2023)

	- Minor compliance -		
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	There was no dispute that involved compensation in Tereh Complex. Hence, this indicator is not applicable	Not Applicable
	on 4.7: Where it can be demonstrated that local peoples have legal, cus shment of rights, subject to their FPIC and negotiated agreements.	stomary or user rights, they are compensated for any agreed land	acquisitions and
4.7.1	<ul> <li>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</li> <li>- Critical (Major) compliance -</li> </ul>	Kulim (M) Berhad has developed the procedure for Land Encroachment; Doc. # PROP/MP/5; Date: 9/6/2020; Rev. # 4. The objective is to establish and maintain the procedures on handling properties encroachment cases. Flow chart of handling the land encroachment by the company and local communities was developed. Besides, compensation calculation (based on situation and management approval) was described in the procedure as well	Complied
4.7.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	The same procedure for Land Encroachment; Doc. # PROP/MP/5; Date: 9/6/2020; Rev. # 4 will be used for calculating and	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 -		Complied
<b>Criteric</b> rights.	contracts to benefit from plantation development.	communities and neighbouring estate	stoma



**RSPO P&C Public Summary Report** 

#### Revision 15 (Nov 2023)

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 -	communities and neighbouring estate	Complied
4.8.2	<b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	There are no customary right lands both operating units under Tereh Complex. It has been confirmed through interview with local communities and neighbouring estate	Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -		Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	There are no customary right lands both operating units under Tereh Complex. It has been confirmed through interview with local communities and neighbouring estate	Complied
Princip	le 5: Support smallholder inclusion		
Criterio	n 5.1: The unit of certification deals fairly and transparently with all smallh	olders (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.	Current FFB prices was displayed at Weighbridge. FFB Prices was based on MPOB and it was publicly available and accessible by	Complied

#### **RSPO P&C Public Summary Report**

#### Revision 15 (Nov 2023)

	- Minor compliance -	smallholders. For certified FFB Supplier from ISH, the FFB Pricing was stated in the agreement and according to MPOB Price.	
5.1.2	<ul> <li>(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).</li> <li>- Critical (Major) compliance -</li> </ul>	The management has socialized the ISH programs during the stakeholder meeting dated 21/09/2023. The topics covered was Current and previous FFB Prices, FFB Pricing Mechanism, RSPO Certification and RSPO P&C.	Complied
5.1.3	<ul> <li>(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</li> <li>- Critical (Major) compliance -</li> </ul>	The management has socialized the ISH programs during the stakeholder meeting dated 21/09/2023. The topics covered was Current and previous FFB Prices, FFB Pricing Mechanism, RSPO Certification and RSPO P&C.	Complied
5.1.4	<b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	stakeholder meeting dated 21/09/2023. The topics covered was Current and previous FFB Prices, FFB Pricing Mechanism, RSPO	Complied
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	For Eng Lee Heng (under WAGS-West), the agreement between both parties was available. Verified that agreement was fair, legal and transparent and have agreed time frame.	Complied
5.1.6	<ul> <li>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</li> <li>- Critical (Major) compliance -</li> </ul>	All payment record was verified and were in order. Refer sample payment voucher for the month of January 2023 and May 2023. Verification through interview with Eng Lee Heng found all payments was made accordingly.	Complied
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).	Records of weighing equipment stamping was maintained on annual basis at visited operating units even though there is no smallholder within Tereh Palm Oil Mill certification unit. Summary of stamping records as follows:	Complied

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### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

	- Minor compliance -	Weighing equipment	Model/Capacity	Date of stamping/cert. number	
		FLINTEC FT- 11	M900110750, 80,000 kg	24/05/2023, A01360	
		GSE 350	986124, 60,000 kg	24/05/2023, A013609	
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 -	stakeholder mee Current and pre Certification and Heng under WAG	ting dated 21/09/2023. vious FFB Prices, FFB Pr RSPO P&C. At the mome GS West with Certificate 5. Mutual agreement be	H programs during the The topics covered was ricing Mechanism, RSPO nt of audit, only Eng Lee No: RSPO660787, Expiry tween both parties was	Complied
5.1.9	<ul> <li>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</li> <li>- Critical (Major) compliance -</li> </ul>	in Grievance Mec 1 Aug 2020. Th (Malaysia) Berha of this mechanism complaints and	hanism Doc. No. SQD/SM e scope covers all thos d and may have complain n is to have a documente	vailable and documented AS/4.1 Issue No. 1 dated we who deal with Kulim ts or grievances. The aim d system for dealing with eeable, accepted by all wer.	Complied
Criterio	<b>n 5.2:</b> The unit of certification supports improved livelihoods of smallholde	rs and their inclusi	on in sustainable palm oil	value chains.	
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	stakeholder me consultation with	eting dated 21/09/2023	H programs during the 3. The topics covered and assess their needs for 1 their interest in RSPO	Complied



**RSPO P&C Public Summary Report** 

#### Revision 15 (Nov 2023)

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 -	The management has socialized the ISH programs during the stakeholder meeting dated 21/09/2023. The topics covered was included on developed and implemented 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.	Complied		
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	The management has socialized the ISH programs during the stakeholder meeting dated 21/09/2023. The topics covered was included on provides support to smallholders to promote legality of FFB production if required. The copy of relevant documents such as MPOB licence, RSPO Certificate were reviewed.	Complied		
5.2.4	<ul> <li>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</li> <li>- Critical (Major) compliance -</li> </ul>	The management has socialized the ISH programs during the stakeholder meeting dated 21/09/2023. The topics covered was involved on Chemical / Pesticide Handling Procedure.	Complied		
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	The management has socialized the ISH programs during the stakeholder meeting dated 21/09/2023. Website and Documentation verification confirmed that Johor Plantations Berhad regularly reviewed and publicly reports on the progress of the Smallholder support programme.	Complied		
Princip	le 6: Respect workers' rights and conditions				
Criterio	<b>n 6.1:</b> Any form of discrimination is prohibited.				
6.1.1	<b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	Innic       discrimination and equal opportunities are available as follows:         kual       1)       Business Policy			

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### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

	- Critical (Major) compliance -	These Policies emphasise on fairness and equal opportunities for relevant group such as all employees, including foreign and local are embedded. These Policies prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. Implementation of these Policies were evidenced from reviews of employment contracts of foreign and local workers, as well as interviews conducted with sampled workers. These workers confirmed the absence of any form of discrimination and that they were accorded equal opportunities.	
6.1.2	<ul> <li>(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.</li> <li>Critical (Major) compliance -</li> </ul>	Reviewed and sampled during the audit were employment contracts, monthly payslips, and manpower supply contract between Kulim (Malaysia) Berhad and PT Hamparan Karya Insani dated 13/01/2020. The agreement states among others that cost of workers' transportation to the respective estates/mill will be borne by Kulim. The Demand Letter issued by Indonesian consulate dated 17/02/2020 also specifies that levy and PLKS fees are to be borne by employer.	Complied
		Payslips of migrant workers that were sampled also showed no evidence of recruitment fees being paid. Interviews were also carried out with local and migrant workers from Indonesia and Bangladesh. Based on the above, there was no evidence of any form of discrimination or charging of recruitment fees for migrant workers.	
6.1.3	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. - Minor compliance -	Evidence was available that the process of recruitment, selection and hiring are based on skills, capabilities, qualities and medical fitness. It has been verified base on the employment contract, training records and program, recruitment records such as job interview and medical check up and also interview with sample workers.	Complied

**RSPO P&C Public Summary Report** 

#### Revision 15 (Nov 2023)

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6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	There is no pregnancy test has been practices for both operating units. There are no female workers that working in the operations or at field which most of the female workers working at admin in the office or as cleaner. It has been confirmed through interview with female workers that has been sample at both operating	Complied
6.1.5	<ul> <li>(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.</li> <li>Critical (Major) compliance -</li> </ul>	As per verification, there is evidence that gender committee has been established by each operating units which has been name as WOW (Women on words) committee. As per interview, the objective of the committee is on of method of communication of the policy/procedure, channel for grievance and to conduct activities between the female workers. Sighted records of activities that has been conducted such awareness on female health, Minutes meeting sighted for all operating units as per below 1. Tereh Selatan Estate- 14/06/2023, 24/08/2023, 16/02/2023 2. Tereh Palm Oil Mill-12/07/2023 3. Selai Estate-25/05/2023 4. Sungai Tawing Estate- 22/01/2023, 22/01/2022	Complied
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	There is evidence indicating equal payment for all types of work performed by the workers. Harvesting, specifically, has been categorized into two systems: mechanical buffalo system and buffalo-assisted harvesting. In both systems, compensation is determined based on the calculation of average bunch wages. As for tasks related to spraying and fertilizer application, workers receive payment on a daily rate, set at RM57.69.	Complied
	<b>on 6.2:</b> Pay and conditions for staff and workers and for contract workers a iving wages (DLW).	lways meet at least legal or industry minimum standards and are suff	cient to provide
6.2.1	<b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in	Kulim (Malaysia) Berhad is a member of the Malaysian Agricultural Producers Association (MAPA) and is therefore subjected to the agreement between MAPA and the National Union of Plantation	Complied
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### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

	national languages (English or Bahasa Malaysia) and explained to them in language they understand. - Critical (Major) compliance -	Workers (NUPW). The MAPA/NUPW agreement dated 2/04/2019 had expired on 31/12/2021. Based on the interview conducted with the NUPW officer, the terms and conditions of the previous MAPA/NUPW agreement remains binding. Pending on the signing of the new agreement still in the court process. The employment contracts signed with all workers contain applicable labour laws related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc are stipulated in the employment contracts. Clause 9 of all the employment contract states that unless otherwise stated, all terms and conditions of contract are subjected to the Employment Act 1955 and SOCSO Act 1969, and the current MAPA/NUPW agreement. These contracts were prepared in Bahasa Malaysia for Malaysian and Indonesian workers. For Bangladeshi workers, the contracts were also prepared in Bengali. In addition, the Company had also printed and distributed to all workers a booklet entitled Buku Panduan Anggota Pekerja Perladangan which contain applicable labour laws and contents of NUPW/MAPA agreement.	
		Workers interviewed confirmed that the contents of their contracts were explained to them prior to signing and that they had understood the contents.	
6.2.2	<b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.	Employment contract has been verified by the auditor during the audit which has been signed by both parties in the document "Employment contract". In the document has detailed up payments and conditions of the employment. Stated in the contract, for salary payment, the management will pay base on minimum wages order 2022 which are RM57.69/day or RM1500/months. While for piece rate workers, rate for each works	Complied

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

	- Critical (Major) compliance -	will be following the MAPA NUPW agreement as per details in indicator 6.2.1.	
3 	Stated also working hours will be from 6.30am to 1430pm with 30minutes rest the field from 1100am to 1130am. While for harvesters, working hours has been set base on task allocation which need to be completed for the day.		
		Mentioned also that overtime will be paid base on 1.5 times for normal days, 2.0times for rest day and 3.0 for public holiday.	
		Workers' payslips were also reviewed which showed accurate information for all work performed, such as daily rated work, piece rated work, overtime, and work on rest days. None of the workers' family members assisted in any of the work done by the workers.	
		Workers who were sampled and their payslips reviewed were as per indicator 6.2.1 above. The payslips sighted for months March'23, June'23 and September'23.	
		Statutory deductions by Malaysian workers were for contributions for EPF, EIS, SOCSO. Foreign workers had no statutory deductions made. Non-statutory deductions for both local and foreign workers were for monthly surau deductions, sports and recreational club membership, NUPW membership fee and payment for advances. Records of workers' applications to deduct their salaries for these non-statutory deductions were sighted and verified	
6.2.3	<ul> <li>(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.</li> <li>Critical (Major) compliance -</li> </ul>	Based on review of workers' sampled punch cards, employment contracts and payslips, evidence was available that Tereh Palm Oil Mill and its supply base were able to demonstrate compliance with Employment Act 1955 related to regular working hours, overtime, sickness and holiday entitlement, maternity leave, etc. This includes statutory deductions (SOCSO, EPF, EIS) and non-statutory deductions (e.g. sports and recreation club, surau funds, electricity	Complied

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

6.2.4	(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.	bills, union membership, etc) in accordance with the relevant laws and Labour Office permits. Based on visits made to the Tereh Palm Oil Mill and estate line site, adequate housing, sanitation facilities, water supplies, medical and welfare amenities are being provided to all employees and their family members residing within the premises. Houses have between 2 to 3 bedrooms with between 2 to 3 occupants per house. Electricity and water are available 24 hours a day, and electricity usage of up to 50kW per month is subsidised. Water is provided free of charge. The areas surrounding the housing area are generally clean and well maintained. The houses were generally in good state of repair and grass kept reasonable short. Domestic waste bins are emptied thrice per week. Perimeter drains are clear of any blockages. Other facilities that has been provided is football field, mosque, clinic and shops	Complied
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	All operating units were able to demonstrate that efforts have been made to improve workers' access to adequate, sufficient and affordable food. Based on visits made to the canteen/grocery shops and interviews conducted with the canteen and grocery shop operators showed that price lists were submitted regularly for price and supply monitoring. Sighted was grocery shop price monitoring and cleanliness inspection, and a price list of items sold.	Complied
6.2.6	A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. <b>PROCEDURAL NOTE:</b> STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and	Based on pay slips sighted, all sampled workers who complete the number of days offered in a month receive at least minimum wages applicable, which is RM1,500 per month, or more. All operating units under Tereh Complex have calculated their own prevailing wages and in-kind benefits. The calculation took into account housing, electricity and water, education, creche facilities, healthcare, sports and recreation activities, transport, clothing and food.	Complied

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

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).	
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.	
In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local	
experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or	
region in accordance to the RSPO endorsed method for determining a DLW. Local	
applicability for benchmarks is important and it may differ based on the needs of each	
locality or country). These benchmarks will be developed in collaboration and consultation	
with relevant stakeholders such as palm oil industry members, workers' union, authorities	
and/or relevant organisations.	
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).	
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:	
<ul> <li>Updated assessment on prevailing wages and in-kind benefits</li> </ul>	
<ul> <li>There is annual progress on the implementation of living wages</li> </ul>	
• 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	

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### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

6.2.7	<ul> <li>The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.</li> <li>Minor compliance -</li> <li>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</li> <li>Minor compliance -</li> </ul>	As per verifications during the site visit, interview and document review, there is no casual, temporary and day labour has been hired by Johor Plantations Berhad- Tereh Palm Oil Mill certification units. All activities has been done by either permanent workers or contractors` workers. For contractors` workers, work that has been done mainly on harvesting and FFB transport.	Complied
freedom	<b>n 6.3:</b> The unit of Certification respects the rights of all personnel to form of association and collective bargaining are restricted under law, the empl personnel.		
6.3.1	<b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented. - Critical (Major) compliance -	established in Bahasa Malaysia and English which can be sighted in	Complied
		There is evidence that the policy has been implemented which operating units has been established. Communication of the policy has been done during morning muster call and have been verified base on the training records. Interview with worker confirmed their understanding on the policy which they has right to join any union established.	
6.3.2	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.	audit and has been established in Bahasa Malaysia. It also has	Complied

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

	- Minor compliance -	Tereh Selatan Estate	
		Minutes meetings sighted for meeting conducted between management and union representative under NUPW and latest meeting has been conducted on 23/03/2023 with attendance representative from both (employer/employee). Representative from employee has been elected by the members and notification sighted from NUPW on 09/02/2022 reference number NUPW/ISB/E/121B/2022. Issues that have been discuss such as water supplied and housing compound. The minutes meeting was documented in Bahasa Malaysia.	
		Rengam Estate	
		Minutes meetings sighted for Rengam Estate dated 18/02/2023 with representative of workers from NUPW	
		Selai Estate	
		There is evidence that minute meeting of representative for NUPW in Selai Estate which latest meeting has been conducted on 04/09/2023 with attendance representative from both employer and employee. Issues that have been discussed is related to housing compound, safety and activities that will be conducted in year 2023.	
		Tereh Palm Oil Mill	
		Minutes meetings sighted 23/06/2023 for Tereh Palm Oil Mill where it has been attended by representative from employer and employees. There is evidence that all workers representative attended is freely elected during the NUPW meeting that has been conducted previously.	
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	Based on audit interview held with NUPW representatives, review of minutes of meetings between NUPW representatives and management evidence was available that management does not interfere with the formation or operation of the NUPW. Workers'	Complied

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### RSPO P&C Public Summary Report

#### Revision 15 (Nov 2023)

	- Minor compliance -	representatives were chosen from among the workers as confirmed by the NUPW representatives. The meetings were attended by Malaysian workers as well as foreign workers from Indonesia and Bangladesh.	
Criterio	on 6.4: Children are not employed or exploited.		
6.4.1	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. - Minor compliance -	Kulim (Malaysia) Berhad has established Core Labour Standard Policy dated 1/10/2021 where they are not engaged in or support the use of Child Labour and will provide adequate support to enable children of its employees to attend and remain in school until no longer a child. This was verified during field observations and review of check roll list. The minimum age of workers to recruit is 18 years old. This requirement is also included in all agreements with its contractors via Addendum to the Agreement.	Complied
6.4.2	<ul> <li>(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.</li> <li>Critical (Major) compliance -</li> </ul>	Documentary evidence is available that minimum age requirements are met. This is based on workers' check roll list and copies of their passport/NRIC details. Based on workers' NRIC and passports, all workers were at least 18 years old when employed.	Complied
6.4.3	<ul> <li>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</li> <li>- Critical (Major) compliance -</li> </ul>	Review from the master list of workers for both estate and POM and interview with the workers, it was confirmed that there are no young workers recruited by the managements of each operating units	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 -	The policy has been explained to related stakeholders for both operating units during the stakeholders' consultations dated 21/09/2023 with attendance of various stakeholders such as local communities, government agencies. Other than that, the management has disseminated policy and procedure to all stakeholders that unable to attend the stakeholders consultations	Complied

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

Criterio	on 6.5: There is no harassment or abuse in the workplace, and reproductive	e rights are protected.	
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	Sexual harassment policy has been established and documented in the document title "Sexual harassment policy" dated 07/12/2021 signed by Mr Mohd Farus Adli Shukery. Stated in the policy that the management recognize that sexual harassment and violence exist both in the workplace and society. The management also committed to eradicate all forms of sexual harassment and violence in the workplace and commitment for zero tolerance against that. The policy has been establish in both English and Bahasa Malaysia There is evidence that the policy has been implemented which operating units has been established. Communication of the policy has been done during morning muster call and have been verified base on the training records. Interview with worker confirmed their understanding on the policy which they has right to join any union established. Policies also being communicated during stakeholder consultation.	Complied
6.5.2	<ul> <li>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</li> <li>Critical (Major) compliance -</li> </ul>	Sexual harassment policy has been established and documented in the document title "Sexual harassment policy" dated 07/12/2021 signed by Mr Mohd Farus Adli Shukery. Stated in the policy that the management recognize that sexual harassment and violence exist both in the workplace and society. The management also committed to eradicate all forms of sexual harassment and violence in the workplace and commitment for zero tolerance against that. The policy has been establish in both English and Bahasa Malaysia There is evidence that the policy has been implemented which operating units has been established. Communication of the policy has been done during morning muster call and have been verified base on the training records. Interview with worker confirmed their understanding on the policy which they has right to join any union	Complied

### RSPO P&C Public Summary Report

#### Revision 15 (Nov 2023)

6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified. - Minor compliance -	established. Policies also being communicated during stakeholder consultation. A census form to assess the needs of new mothers is available. This form enables the assessment to be done of new mothers' needs for creche/childcare, antenatal, vaccination, maternity and paternity, postpartum care, prenatal check-up, breastfeeding facilities, awareness and counselling. However, there has been no new mother during the past one year. Nevertheless, female employees interviewed confirmed their awareness of this assessment form	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	The Company's grievance mechanism is available and documented in Grievance Mechanism Doc. No. SQD/SMS/4.1 Issue No. 1 dated 1 Aug 2020. The scope covers all those who deal with Kulim (Malaysia) Berhad and may have complaints or grievances. The aim of this mechanism is to have a documented system for dealing with complaints and grievances that is agreeable and accepted by all stakeholders. Clause 5.8 states that anonymity of complainants will be respected and protected if requested. This mechanism was briefed during muster	Complied
		The Company has established a complaint flowchart for WOW (Carta Alir Aduan WOW). This flowchart shows the different stages involved when WOW receives and handles grievances. The efficiency of handling the grievances can be further improved by incorporating specific timeframes for each stage.	
Criterio	n 6.6: No forms of forced or trafficked labour are used.		
6.6.1	<ul> <li>(C) All workers have entered into employment voluntarily and the following are prohibited:</li> <li>Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> </ul>	As per verification, there is no forms or trafficked labour has been used for all operating units under Johor Plantations Berhad- Tereh Palm Oil Mill certification unit. It has been verified base on the interview and records.	Complied
	Charging the workers for recruitment fees.	a. Retention of passports/ identity document- As per interview at the workers quarters, there is evidence that workers kept	

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### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

Contract substitution	passport by their self at the housing which able to show after
Involuntary overtime	requested by the auditor. The workers also mentioned that workers need to submit passport 3 months before passport
<ul> <li>Lack of freedom of workers to resign</li> </ul>	renewal.
<ul> <li>Penalty for termination of employment</li> </ul>	b. Charging of recruitment fees- As per interview with newly
Debt bondage	recruitment workers, there is evidence that there is no
Withholding of wages	recruitment fees has been charged for all workers. All fees,
- Critical (Major) compliance -	transport cost has been beared by recruiting agent. It has been
	further confirmed based on payslips of newly recruited workers for 1 <sup>st</sup> and 2 <sup>nd</sup> months of works.
	c. Contract substitution- As per interview, there is no contract substitution has been practised where workers clearly
	mentioned that they has been explain on scope of jobs and
	locations of the workplace.
	d. Penalty for termination of employment-
	There is no termination has happen in all operating units under
	Tereh Complex.
	e. Debt bondage: There is no evidence of any incidence of debt
	bondage. It has been verified based on sample of pay slips
	where there is no deduction of salary for debt. Further verification has been done through interview that confirmed
	that there is no loan/borrowing money given by the
	management to the workers. There is also no recruitment fee
	charged to the workers, hence confirmed that there is no debt
	bondage implemented. As per interview, there is no cost borned
	by the workers during the recruitment process. From the workers respond, they only used money which is for their own
	goods. Other cost has been paid by the management.
	f. Withholding of wages: There is no evidence of withholding of
	wages. Workers' wages have been paid by the management

#### **RSPO P&C Public Summary Report**

#### Revision 15 (Nov 2023)

		bank account and can be withdrawn at the nearest ATM and sighted evidence of payment that has been signed by the workers. There is evidence that there were no workers' wages being withheld by the management. It has been further confirmed through interview with the workers	
6.6.2	(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented. - Critical (Major) compliance -	<ul> <li>Special labour policy and procedures have been established under the Kulim (Malaysia) Berhad Core Labour Standard signed by Executive Director dated 1/10/2021.This Policy:</li> <li>1) prohibits the employment of children and young persons, forced and bonded labour</li> <li>2) provides for signing of written employment contracts in a language they understand with clear remuneration and description of duties.</li> <li>3) workers' entitlement to housing and basic amenities which are at par with statutory requirements.</li> <li>4) free of discrimination, coercion, or violence</li> <li>5) rights of employees to join trade unions.</li> <li>6) accessibility to grievance procedure</li> <li>7) entitled to one day off per week.</li> <li>Based on pay slips, employment contracts, punch cards reviewed, and interviews conducted with workers, were able to demonstrate the implementation of this Policy</li> </ul>	Complied
Criterio	<b>6.7:</b> The unit of certification ensures that the working environment under	r its control is safe and without undue risk to health.	
6.7.1	<b>(C)</b> 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. - Critical (Major) compliance -	The General Manager/ Senior Manager/ manager/ Deputy Manager/ Assistant In-Charge/ Acting manager of the respective Operating Units are appointed as the Chairman for Safety and Health Committee at the estate as stated in the appointment letter dated 01/02/2023 undersigned by the Chairman, ESG Committee Occupational Safety and Health Main Committee Kulim (M) Berhad.	Complied

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

been held by the	Records were available confirming that quarterly OSH meetings had been held by the estate which involved the employees and contractors. The date of last four meetings are as follows:			
OSH Meeting	Tereh Selatan Estat	e Rengam Estate		
1 <sup>st</sup> Quarter	15/03/2023	23/03/2023		
2 <sup>nd</sup> Quarter	19/06/2023	27/06/2023		
3 <sup>rd</sup> Quarter	11/09/2023	28/09/2023		
4 <sup>th</sup> Quarter	-	-		
	I			
OSH Meeting	Selai Estate	Sg Tawing Estate		
1 <sup>st</sup> Quarter	06/02/2023	01/03/2023		
2 <sup>nd</sup> Quarter	17/05/2023	14/06/2023		
3 <sup>rd</sup> Quarter	11/08/2023	11/10/2023		
4 <sup>th</sup> Quarter	-	-		
	I			
OSH Meeting	Tereh Pa	lm Oil Mill		
1 <sup>st</sup> Quarter	20/03/2	)23		
2 <sup>nd</sup> Quarter	21/06/2	)23		
3 <sup>rd</sup> Quarter	26/09/2	)23		
4 <sup>th</sup> Quarter	-			

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

6.7.2	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. - Minor compliance -	"Prosedur Kecemasan". Among th are fire breakout, and flood. E Working Procedures were availab chemical stores. Emergency Pla incidences such as Fire, Accident,	, rev. 1, dated 01/03/2021] and e emergency situations identified mergency Procedures and Safe ole at the office, workshops and ns were available for identified Chemical Spillage and Evacuation. ormed in the estate to counter any	Complied
		Estate	Training date	
		Tereh Selatan Estate	12/10/2023	
		Rengam Estate	21/08/2023	
		Tereh Palm Oil Mill	05/03/2023	
		Sg Tawing Estate	02/04/2023	
		Selai Estate	16/06/2023	
		First aiders were present in the operating and obtained certificates the operating units. Visit to the station and gangs were equipped the respective first aid holders inco on the methods to use the items are regularly monitored by the mil replenish the used items and re	as the PIC to address first aid in mill and estates indicated each with first aid kits. Interview with licated that they were well aware in the first aid boxes. The boxes I and estate Hospital Assistants to	

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

items used were also m inspection as follows:	lso maintained and availat ws:	ble in the boxes. Latest	
Estate/ Mill	First Aid Training date	Latest First Aid Monitoring Record	
h Selatan Estate	tate 17/10/2023	12/10/2023	
gam Estate	04/10/2023	04/10/2023	
ereh Palm Oil Mill	ill 01/10/2023	10/10/2023	
Tawing Estate	18/05/2023	25/10/2023	
lai Estate	13/08/2023	10/10/2023	
Accident Records were maintained in the operating units and verified as follows.			
<u>reh Selatan Estate</u>	ite		
Accident records for 2022 were maintained and available for verification. The JKKP 8 Form (Reference Number: JKKP 8/128056/2022) for the year ending 2022 have been submitted to DOSH on 13/01/2023 and available for verification. There were 11 accidents reported for the year 2022 with 28 TLA. The JKKP 6 Forms have been submitted to DOSH and available for verification.			
ngam Estate			
Accident records for 2022 were maintained and available for verification. The JKKP 8 Form (Reference Number: JKKP 8/138655/2023) for the year ending 2022 have been submitted to DOSH on 27/01/2023 and available for verification. There were 6			

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

			rted for the year 2022 with 61 TLA. The JKKP 6 Forms mitted to DOSH and available for verification.	
		<u>Tereh Palm Oi</u>	l Mill	
		verification. 8/135233/202	rds for 2022 were maintained and available for The JKKP 8 Form (Reference Number: JKKP 2) for the year ending 2022 have been submitted to 11/2023 and available for verification. There were no rted.	
		<u>Selai Estate</u>		
		verification. 8/132307/202 DOSH on 18/0 accidents repo	rds for 2022 were maintained and available for The JKKP 8 Form (Reference Number: JKKP 2) for the year ending 2022 have been submitted to 01/2023 and available for verification. There were 4 rted for the year 2022 with 10 TLA. The JKKP 6 Forms mitted to DOSH and available for verification.	
		Sg Tawing Est	ate	
		verification. 8/132217/202 DOSH on 18/0 accidents repo	rds for 2022 were maintained and available for The JKKP 8 Form (Reference Number: JKKP 2) for the year ending 2022 have been submitted to 11/2023 and available for verification. There were 20 orted for the year 2022 with 281 TLA. The JKKP 6 een submitted to DOSH and available for verification.	
6.7.3	<b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for	carried out at	ance record for the year 2023. Based on the HIRARC Non- the estates/mill the PPE types for the various activities complian tified and implemented.	
	those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.	Category	PPE provided	

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Page 113 of 171

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

Major) compliance -	Tractor Driver	Safety Helmet, Safety Shoes, Ear Plug, Safety Vest.
	Sprayers	Respirator, nitrile glove, goggles, wellington boots, apron.
	Manuring	Apron, wellington boots, dust mask, nitrile glove.
	Harvester	Safety helmet, Goggle, sickle cover, hand glove, wellington boots
	all employees. shoes. Special Safety shoes is	Records of PPE issued are maintained individually to PPE issued to the workers is safety helmets, safety PPE for workers assigned to height, confined space. sued on a 6 monthly basis and recorded.
	Category Mill operator	PPE provided Safety boots, earmuff, safety vest, helmet,
		cotton glove
	Water treatment Pla Operator	Safety boots, earmuff, safety vest, helmet, cotton glove, dust mask.
	Workshop	Safety Helmets, Goggles, Leather Gloves, safety Shoes.
	according to t	states visited provided appropriate PPE to all worker he job type. The PPE given as per HIRARC and ctive Equipment (PPE) Procedure.

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

		equipment (PPE charge. During t	), which is provine field visit to the stores of the	the Spraying Gar respective estate	ersonal protective agement free of ng and Manuring es and mill, it was	
			es prior to returr	ning home from w	the workers to ork. The showers	
		PPE usage for Ma	anuring Activity v	was not effectivel	y implemented.	
		During site visit at Tereh Selatan Estate, Field P17/3, Manur operation (Mix 1) it was found that all 4 workers was not wear Mask as their PPE. It was not in line with Procedure Manuring a HIRARC that was referred to SDS Section 8.3 Personal Protect Equipment (PPE), safety glass / goggles, Gloves, wear bo covering clothing, rubber shoes and use approved respirate protective equipment. Thus, Major NC was raised.				
6.7.4	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. - Minor compliance -	operating units dispensary mana restrictions for w In case of major	All workers are provided with medical care which is borne by the operating units management. Each operating unit has its own dispensary managed by a certified Hospital Assistant. There are no restrictions for workers to obtain medical aid from the dispensary. In case of major injuries or health issues, workers are referred to private clinics or hospitals which is totally borne by the management as well.			
		Operating Unit	Month	Total Workers	Amount	
		Tereh Selatan	May 2023	220	RM7,XXX.XX	
		Estate	Aug 2023	229	RM8,XXX.XX	

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Page 115 of 171

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

				-		
			Sept 2023	227	RM8,XXX.XX	
		Rengam	May 2023	232	RM8,XXX.XX	
		Estate	Aug 2023	238	RM8,XXX.XX	
			Sept 2023	240	RM8,XXX.XX	
		Tereh Palm	May 2023	94	RM8,XXX.XX	
		Oil Mill	Aug 2023	94	RM8,XXX.XX	
			Sept 2023	94	RM8,XXX.XX	
		Sungai Tawing Estate	May 2023	201	RM7,XXX.XX	
			Aug 2023	212	RM8,XXX.XX	
			Sept 2023	215	RM8,XXX.XX	
		Selai Estate	May 2023	268	RM9,XXX.XX	
			Aug 2023	271	RM9,XXX.XX	
			Sept 2023	265	RM9,XXX.XX	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	during the safety metrics was main	nces are reviewed ne Accident (LTA) Ind to be updated. MyKKP systems.	Complied		
		Operating Unit		2022		

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

			Cases	Days	Average Hours	Average Day	
		Tereh Selatan Estate	11	28	445,800	187	
		Rengam Estate	6	61	379,464	163	
		Tereh Palm Oil Mill	0	0	338,000	130	
		Sg Tawing Estate	20	281	362,400	151	
		Selai Estate	4	10	180,408	76	
		* Death case is catego	rized as lo	oss of 60	00 days.		
Princip	e 7: Protect, conserve and enhance ecosystems and the environm	ent					
Criterio	n 7.1: Pests, diseases, weeds and invasive introduced species are effective	ely managed using appro	priate Int	egrated	Pest Managen	nent (IPM) te	chniques.
7.1.1	<ul> <li>(C) IPM plans are implemented and monitored to ensure effective pest control.</li> <li>- Critical (Major) compliance -</li> </ul>	The estates has establi on controlling the pest i the plan established as 1. Ganoderma census	nfestation follows:				Complied
		2. Rat baiting program	n				
		3. Barn owl census					
		4. Maintenance of barn owl box					
		5. Beneficial plant pla	nting prog	gram			
		Reviewed the implement	ntation of	the mar	agement plar	as follows:	

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

		R	The ganoderma census conducted for the year 2023 for tengam Estate. The estate conducted the census on September 023.	
		2	ample on Rat baiting programs for Rengam Estate was on Jan 023 for field P00 and P03. Records of implementation is vailable for review.	
		h	Barn Owl Box ratio in the Tereh Selatan Estate recorded at 1:15 a. Reviewed the latest barn owl census FY 2023 with accupancy recorded at 65%.	
		m	at damage census at Selai Estate which was conducted in the nonth of July until September 2023, and the programme was onducted on in the month of June until September 2023	
		Fe O	Lat baiting census program conducted on the month of ebruary 2023, April 2023, June 2023, August 2023, and October 2023. Rat baiting program conducted for the month of anuary 2023 and May 2023.	
			lanting of Turnera Subulata at Sg Tawing Estate conducted in he month of May 2023.	
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.		e were no species referenced in the Global invasive Species pase and CABI.org sighted within the estate and POM premises.	Complied
	- Minor compliance -			
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	Verific condu replar	vidence of fire use to control pest in the estates sampled. cation at Sg Tawing Estate field P98/02 where replanting are ucted. There is no evident of fire being used as part of nting process. The management adopt with the chipping of for composting prior to planting new palm.	Complied

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

Criterio	n 7.2: Pesticides are used in ways that do not endanger health of workers	, families, communities or th	e environment.		
7.2.1	<ul> <li>(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.</li> <li>- Critical (Major) compliance -</li> </ul>	The written justification of Malaysia Berhad Agricultur Table H01-2 till Table H01 Active Ingredient, Chemica Dosage/18L	Complied		
LD50, area treated, amount of active ingredients applied per ha and real number of applications) are provided.	Records of Pesticide/Agr recorded and monitored verification. Data were san Tereh Selatan Estate		Complied		
		Chemicals	Aug 2023	Sept 2023	
		Kenlly/G Met	0.00025	0.00236	
		Ken Glyphosate	0.01487	0.05140	
		Miracle	0.02417	0.03022	
		Rengam Estate			
		Chemicals	Aug 2023	Sept 2023	
		Foxil	0.01	0.01	
		Ken Glyphosate	0.04	0.04	
		Miracle	0.0001	0.0001	
		Sungai Tawing Estate			
		Chemicals	Aug 2023	Sept 2023	

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Page 119 of 171

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

		Ken Glyphosate	0.04	0.05			
		Miracle	0.0036	0.009			
		Selai Estate	Selai Estate				
		Chemicals	Aug 2023	Sept 2023			
		Ally	0.0032	0.00043			
		Supremo 41	0.0487	0.0200			
7.2.3	<ul> <li>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</li> <li>- Critical (Major) compliance -</li> </ul>	The estates have implem where they have stated chemical through impleme Plan.	Complied				
		Sighted during the site visi beneficial plants along the as barn owl boxes plac eliminated. In its place, a instead.					
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -	There is no prophylactic us	e of pesticides in all	estates visited.	Complied		
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:	The Chemical Registers f available for verification a there are introductions of r The register showed that o the mill and estates. Parac	nd reviewed yearly new chemicals in the nly class III & IV pes	and as and when operations.	Complied		

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

	<ul> <li>a) Judgment of the threat and verify why this is a major threat</li> <li>b) Why there is no other alternative which can be used</li> <li>c) Which process was applied to verify why there is no other less hazardous alternative</li> <li>d) What is the process to limit the negative impacts of the application</li> <li>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</li> <li>Minor compliance -</li> </ul>	In its place, less hazardous alternatives so Acephate was used instead.		
7.2.6	<b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out. - Critical (Major) compliance -	Pesticide operators are given training on application of the pesticides. Suitable equipment's and application equipment pro- based on the PPE issuance forms. Sampled the training conducted for pesticide Tereh Selatan Estate	Complied	
		Training	Date	
		Spraying Calibration Training	16/05/2023	
		Chemical Mixing	29/09/2023	
		Triple Rinsing Training	03/08/2023	
		Rengam Estate	·J	
		Training	Date	
		Spraying Technique Training	08/06/2023	

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

Chemical Handling an	nd Spill containment	18/05/2023	
Triple rinsing		12/05/2023	
SDS Training		18/05/2023	
Tereh Palm Oil Mill			
Training		Date	
Chemical handling		02/10/2023	
Sg Tawing Estate			
Training		Date	
Spraying Calibration		10/04/2023	
Chemical Handling		14/02/2023	
Triple Rinsing		08/01/2023	
Selai Estate			
Training		Date	
Spraying calibration		12/09/2023	
Chemical handling		10/04/2023	
Safety work at Chem	ical store	15/06/2023	
			1

...making excellence a habit." Page 122 of 171

#### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

#### Triple rinsing 10/04/2023 (C) Storage of all pesticides is in accordance with recognised best 7.2.7 Pesticides were found stored in the mill and all estate's Chemical Complied Store in accordance with the Occupational Safety and Health Act practices. 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their - Critical (Major) compliance -Regulations. The stores were at all times locked and at the time of visit the store keeper was seen to unlock the pad-lock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage 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 Complied Excess chemical containers that were not used for premixing have disposed of and/or handled responsibly if used for other purposes. been triple rinsed and punctured was categorized under scheduled - Minor compliance waste and disposed through waste contractors. All estates has disposed the empty chemical container to the licensed 3<sup>rd</sup> party. Samples records for disposal as the following: 1. Tereh Selatan Estate has disposed the Empty Chemical Container to Licensed 3<sup>rd</sup> party Contractor, SS Setia teknologi Enterprise. Cash Sale No: 2342 24/05/2023 was available for verification. A total of 130 pieces of empty chemical container and 494 rait bait plastic. Triple rinsing records are available for verification dated 22/10/2023. 2. Selai Estate has disposed the Empty Chemical Container to Licensed 3rd party Contractor, Kualiti Alam Sdn Bhd. Consignment Note (C.N Number: 20231012102J83X7 dated 12/10/2023 was available for verification. A total of 0.0311 mt

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

		of Empty Chemical Containers was disposed under code SW409.	
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 -	No aerial spraying for pesticide were done in all the estates	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 CHRA of each operating units have recommended the necessity of annual medical surveillance for pesticide applicators exposed to pesticides that are classified as organophosphates. There were no use of organophosphate chemicals in all the estates audited. This was verified via the Chemical Register, visit to the Chemical Store of each operating units as well as interview with the respective estate's pesticide applicators. Nevertheless, the estates conduct monthly health screening at the estate clinics by their own Medical Assistant and records were available for verification. Health surveillance are also done for the workers to identify general health conditions regularly. Records were available and verified as below: Tereh Selatan Estate - Medical Surveillance for 2023 was conducted for 38 estate workers on 30/07/2023 for workers exposed to n- hexane, pesticides and hazardous fumes. The medical surveillance	Complied
		was conducted at Uni Klinik, Permas Jaya. The results indicated that all workers had no abnormal results that were occupational caused.	
		Rengam Estate - Medical Surveillance for 2023 was conducted for 10 estate workers on 02/08/2023 for workers exposed to n-hexane, pesticides and hazardous fumes. The medical surveillance was conducted at JPG Terrasolutions Sdn Bhd. The results indicated that all workers had no abnormal results that were occupational caused.	

Page 124 of 171

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

		Tereh Palm Oil Mill - Medical Surveillance for 2023 was conducted for 46 mill workers (6 workers exposed by N-Hexane, 1 worker exposed on Pesticides and 39 workers for biological effect monitoring) and on 30/07/2023 for workers exposed to n-hexane, pesticides and hazardous fumes. The medical surveillance was conducted at JPG Terrasolutions Sdn Bhd. The results indicated that all workers had no abnormal results that were occupational caused. Sg Tawing Estate - Medical Surveillance for 2023 was conducted for 23 estate workers on 01/08/2023 for workers exposed to n-hexane, pesticides and hazardous fumes. The medical surveillance was conducted at JPG Terrasolutions Sdn Bhd. The results indicated that all workers on 01/08/2023 for workers exposed to n-hexane, pesticides and hazardous fumes. The medical surveillance was conducted at JPG Terrasolutions Sdn Bhd. The results indicated that all workers had no abnormal results that were occupational caused. Selai Estate - Medical Surveillance for 2023 was conducted for 44 estate workers on 01/08/2023 for workers exposed to n-hexane,	
		pesticides and hazardous fumes. The medical surveillance was conducted at Uniklinik Permas jaya. The results indicated that all workers had no abnormal results that were occupational caused.	
7.2.11	<ul> <li>(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.</li> <li>Critical (Major) compliance -</li> </ul>	For Johor Plantations Berhad, the SOP for Agrochemical Management under Sustainable Management System; Doc Number: SQD/SMS/6.1; Doc Date: 01.08.2020 (Issue 01) states "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." All estates visited have prohibited woman workers who are confirmed pregnant or breast-feeding to handle chemicals as per Internal Memo verified in the estates.	Complied

### RSPO P&C Public Summary Report

#### Revision 15 (Nov 2023)

7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented. - Minor compliance -	The operating units have meticulously crafted a comprehensive Waste Management Plan that intricately delineates various waste products and their respective sources. This plan, a testament to the organization's commitment to environmental stewardship, undergoes a thorough annual review to ensure its continued relevance and efficacy.	Complied
		Within the category of Scheduled Waste, the plan identifies specific items such as empty chemical containers (SW409), empty hydrocarbon containers (SW409), batteries (SW102), spent oil (SW305), and more. These scheduled waste items are linked to particular sources, ranging from the process of chemical application at the laboratory and water treatment plant to the workshop and fertilizer store.	
		The Non-Scheduled Waste category encompasses a diverse array of waste types, including domestic waste from linesite, recyclable materials like plastics and bottles, garden waste, and kitchen waste. Workshop-generated waste includes used welding rods and tools, broken metal equipment, and mill byproducts, such as POME (Process extraction of CPO), EFB, shredded fiber, shell, boiler ash, and liquid waste.	
		The Waste Management Plan not only accounts for solid waste but also addresses liquid waste concerns. Effluent discharge (land) from furrows, septic tank overflow, and spillage from linesite are meticulously documented and managed. Rubber materials, office- related waste like used paper and spent printer cartridges, as well as emissions such as black smoke, dust, and air pollutants from mill stacks, are all systematically considered.	
		This robust Waste Management Plan aligns seamlessly with waste identification practices, and its periodic review ensures that it	

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

remains adaptive and responsive to the evolving needs of sustainable waste management within the operational units.
Tereh Selatan Estate
Reviewed the waste management plan established that stated scheduled management must be conducted as per Work Instruction, Scheduled Waste, issue no. 1, rev. 0. Dated 01/10/2022. Refer document no. SPO/WI/06. In the SOP established, under section 6 Reference stated the storage of schedule waste were according:
<ul> <li>6.4 Waste Card as per 7<sup>th</sup> Scheduled of Environmental Quality (Scheduled Wastes) Regulations 2005</li> <li>6.5 Work Instructions on scheduled waste management (this document)</li> <li>6.6 SOP on packaging and labelling scheduled waste for disposal</li> <li>6.7 Standard label for scheduled waste</li> </ul>
The training on schedule waste management was conducted on 16/10/2023 and 14/03/2023.
Rengam Estate
The waste management reviewed on 01/08/2023 details the waste type, souces, action plans, frequency, records and responsibility.
Sample of waste taken is as following:
TypeSourceActionFreqRecordsRespons bility
Contami nated SoilWorksh opCollect andWithin 180SW Disposal 

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RSPO P&C Public Summary Report Revision 15 (Nov 2023)

<b></b>					dav£		Chanalya	,r
				Schedul	day of		Storeke	
				e Waste Store	generati on		eper, Forema	
				SLOIE	UII		n	
		Tereh Palm	n Oil Mill					
		Schedule v	Schedule waste training dated 16/07/2023					
		Selai Estate	Selai Estate					
			The waste management reviewed on 01/09/2023 details the waste type, souces, action plans, frequency, records and responsibility.					
		Sample of	Sample of waste taken is as following:					1
		Туре	Source	Action	Freq	Records	Respons	
					•		bility	
		Contami nated rags / sacks	Fertilizer store, chemical store	Collect and place in the Schedul e Waste Store	Within 180 days from day of generati on	SW Disposal Records, PCD Claning records, Training	Manager , Asst Manager , Storeke eper, Forema	
7.3.2	Proper disposal of waste material, according to procedures that are fully		ting units k	ac octablic	hod and de	cumontod	n Waste and	Complied
1.3.2	understood by workers and managers, is demonstrated. - Minor compliance -	Pollution M was review	lanagement	t Plan as p ually basis	er waste io . The plan	dentification includes W	n. The plan /aste Type,	Complied
		Kulim (M) waste gen disposal of	Berhad has erated doci	s establishe umented in waste. Refe	d procedur Labelling,	e to handle handling, s	e scheduled storage and WI/19, rev.	

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### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

on the waste ma implementation of The mill mainta generated by m Reviewed the im and September 2 The mill and e through licensed of the latest disp	anagement pla of the manager in the records ill operation a ventory record 2023. estate disposed operator, Kual posal records as	n and ment p s of in nd not s for t d the iti Alar s follow		
Estate	Date	SW	Consignment Note no	
Tereh Palm Oil mill	29/08/2023	410 409 305 110 429	2023082913547XWU 2023082913T58NQW 20230829130KQXUE 202308291360SBUZ 20220905150YTHVO	
Tereh Selatan Estate	13/07/2023	404 408 409 110 307	2023071316M0ETWZ 2023073109EOA0ZI 2023073109ECVNLQ 2023073109BH3R5G 20230731094XSI3O	
Rengam Estate	31/07/2023	409 307 410 408	2023073110WR58KJ 20230731100WRPGU 20230731101BE3S4 2023073110CBXP0J	

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Page 129 of 171

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

			306	2023073110YN3XMB	
	Selai	12/10/2023	109	2023101210JNGKIM	
	Estate		305	2023101210QJZ935	
			306	2023101210VC21W	
			307	2023101210F7LOS8	
			409	20231012102J83X7	
			410	202301210WF4ZBC	
			306	20231012100R1HK3	
	Sg Tawing	29/08/2023	408	20230829090YIHDP	
	Estate		307	2023082909XS63U	
			410	2023082909CRK0YF	
			110	2023082909ML82CI	
			410	2023082909PJMRKZ	
			305	2023082909XGB8IR	
			409	2023082909OEK9G	
-					
				e Schedule Waste Inventor e latest submission as follows	
1	L. Tereh Sela 20/10/2023		Ref No	p: JAS.JKL.600-3/4/79 dated	d
2	2. Rengam l 30/10/2023		No:	JAS.JKL.600-3/2/44 dated	d
3	3. Tereh Palr 31/10/2023		Ref No	b: JAS.JKL.600-3/1/12 date	d

# bsi.

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

		4. Selai Estate – Ref No: AS(B)J11/123/000/171 dated 30/10/2023				
		<ol> <li>Sg Tawing Estate – Ref No: AS(B)J11/123/000/173 dated 31/10/2023</li> </ol>				
		Domestic Waste				
		The estate disposed the domestic waste through landfill. Visitation at landfill area found that the area is well manage as per the SOP established. Only domestic waste were disposed in the landfill Details of location visited as the following:				
		1. Tereh Selatan Estate – Block 04 - 2°11′14″ N , 103°20′48″ E.				
		2. Rengam Estate – P03 Block 02 - 1°54′14″ N , 103°25′4″ E.				
		3. Tereh Palm Oil Mill – P04 Block 1 - 2°13' 16" N 103°21' 35" E				
		4. Selai Estate – P14 Block 1 - 2°15' 36" N 103°25' 52" E				
		Verification during the interview with each PIC for domestic waste and schedule waste handling found that the understanding on waste handling is good. Sample of the training taken is as following:				
		Selai Estate – Schedule Waste and PCD Cleaning training conducted on 14/06/2023.				
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	There is no indication of fire being used for waste disposal. Domestic waste was properly disposed of in a designated landfill area. There is also no sign of scheduled waste or recyclable waste in the landfill.				
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.						
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	SOPs of good agricultural practices to manage soil fertility to optimise yield and minimise environmental impacts were				

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

		documented in Kulim (Malaysia) Berhad – Agricultural Manual under	]
		section D: Manuring. The procedure includes:	
		D01 – General Information	
		D02 – Methods of Applications	
		D03 – Precision Manuring	
		D04 – Quality Check and Storage	
		D05 – EFB Utilization	
		D06 – POME Utilization	
		D07 – MIWAMAS Composting System	
		D08 – Bio-compost Application	
		D09 – Bio-compost : Quality Check	
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 -	<ul> <li>Foliar and soil sampling was carried out by Internal Agronomist from Agronomy Advisory and Services Department prior to the fertilizer recommendation for the next financial year. Leaf and soil nutrient analysis are commonly used in the diagnosis of fertilizer requirements in oil palms. The frequency for leaf sampling must be conduct for every year while for soil analysis, the frequency for soil sampling is conducted at 5 years intervals (Leaf and Soil Sampling Notes Procedure - Kulim (M) Bhd.</li> <li>Reviewed the sampling records as follows:</li> <li>1. <u>Tereh Selatan Estate</u> Latest Soil Sampling was conducted in January 2023. Refer report no. LI/2023/01/06 dated 10/01/2023. Latest leaf sampling was conducted on February 2022. Refer report no. LI/2021/02/19 dated 09/02/2022.</li> <li>2. Pongam Estate</li> </ul>	Complied
		<ol> <li>Rengam Estate         Latest leaf and soil Sampling was conducted in 28/03/2022 to 11/04/2022 with the test conducted on 13—17/04/2022. Lab     </li> </ol>	

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Page 132 of 171

**RSPO P&C Public Summary Report** 

#### Revision 15 (Nov 2023)

		report dated 24/02/ available for review. 3. Selai Estate Latest Soil Sampling was no. SI/2023/08/98 dated conducted on August 2023 07/08/2023			
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 -	<ul> <li>The estates implement serecycling strategy, which in</li> <li>1. Applying Empty Fruit dosage determined Agronomists.</li> <li>2. Stacking cut fronds i them to decom pose</li> <li>3. Applying bio compositions</li> <li>4. Utilizing Palm Oil Mill for effective resource</li> <li>The estate has establish program FY 2023. Review October 2023 as follows:</li> </ul>	nclude: Bunches (EFB) in sp based on reco n between rows of naturally. t in selected fields. Effluent (POME) thro utilization. ned EFB and Bio-	pecific fields, with the ommendations from palm trees, allowing ough a furrow system Compost application	
		Estate		nage EFB	
			Bio compost		
		Tereh Selatan Estate	2,783.90	3,519.00	
		Rengam Estate	5,674.07	1,490.76	
		Selai Estate	6,808.06	0.00	

#### **RSPO P&C Public Summary Report**

#### Revision 15 (Nov 2023)

		The mill has recorded the EFB produced for the year 2022 and until todate September 2023. Total of 67,609.23 mt of EFB produce in 2022 an 43,875.02 mt in 2023 equivalent to 20.34 % and 20.45 % to the FFB process respectively.	
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	The fertiliser application was conducted as per recommendation by agronomist base on foliar sampling conducted. The fertiliser application records was available at the estate visited for review. Sample taken as following:	
		1. Tereh Selatan Estate – Report dated September 2023 showing all field manuring operation was completed	
		<ol> <li>Rengam Estate – Report dated 27/10/2023 showing the progress is complete until August programs at all field except the replanting area P00 and in progress at P06. The verification on fertilizer recommendation made by the Agronomy Advisory Department dated 10/01/2023.</li> </ol>	
		<ol> <li>Selai Estate – Report of manuring application is available for review. The progress is complete as until October 2023 for all field.</li> </ol>	
		<ol> <li>Sg Tawing Estate – Report of manuring application is available for review. The progress is complete as until August 2023 for all field as per recommendation by agronomist.</li> </ol>	
Criterio	<b>n 7.5:</b> Practices minimise and control erosion and degradation of soils.		
7.5.1	<ul> <li>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</li> <li>- Critical (Major) compliance -</li> </ul>	The operating units has identified the soil series in the estates and established soil series maps. Soil series identified in the estates as follows:	
		Estate Soil Series	

**RSPO P&C Public Summary Report** 

#### Revision 15 (Nov 2023)

	Tereh Selatan Estate	Batang Merbau (12.01%), Batu Lapan (1.37%), Bungor (7.79%), Chermin (1.64%), Jabil (1.2%), Lubok Sendong (3.52%), Rengam (17.79%), Setol (2.54%), Sogomana (3.90%), Tai Tak (19.72%), Siri Tawar (16.10%), Tebok (11.29%), Tepus (1.13%)	
	Rengam Estate	Baling (14.09%), Durian (0.57%), Pelepah (1.12%), Rengam (57.51%), Tai Tak (14.46%), Tepus (12.25%)	
	Selai Estate	Kesatuan Jabil – Tepus (0.37%), Kesatuan Tai Tak Rengam (19.69%), Kompleks Aluvium Setempat (4.81%), Organic Clay & Muck (0.17), Batang Merbau (3.11%), Batu Lapan (0.86%), Binjai (16.51%), Harimau (10.23%), Lating (0.19%), Medang (4.08%), Padang Besar (2.66%), Pelepah (3.74%), Tai Tak (10.43%), Tebok (16.59%), Tepus (6.13%), Tok Yong (0.43%).	
	Sg Tawing Estate	Kesatuan Jabil-Tepus (3.14%), Kompleks Aluvium-Setempat(2.74%), Batu Lapan (3.87%), Bungor (17.71%), Chat (3.29%), Gajah Mati (0.79%), Gong Chenak (1.83%), Harimau (1.94%), Kechor (1.51%), Kuala Brang (0.23%), Padang Besar (6.89%), Serdang (3.61%), Sitiawan (1.44%), Slime Tailings (0.58%), Tai Tak (13%), Tawar (7.62%), Tebok (23.6%), Tepus (4.64%), Terap (1.5%), Tanah Curam (0.07%)	



RSPO P&C Public Summary Report

#### Revision 15 (Nov 2023)

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 -	<ul> <li>Addressed in the Agricultural Manual under chapter as follows:</li> <li>1. A07 – Terrace and Platform Construction</li> <li>2. A07A – Palm Lining and Terrace</li> <li>3. A08 – Harvester Path Construction</li> <li>4. A17 – Protection of Natural Water Courses and</li> <li>5. A18 – Water Management Plan in Peat Area.</li> <li>No replanting was conducted on steep slopes more than 25 degree.</li> </ul>	Complied
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No new planting conducted at all estates visited as verified and sighted during site visit.	Complied
<b>Criterio</b> operatio	<b>n 7.6:</b> Soil surveys and topographic information are used for site planning ns.	in the establishment of new plantings, and the results are incorporate	d into plans and
7.6.1	<b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	Soil series and topography map available for estate sampled. No fragile soil categorized in the estates sampled. Details is as per 7.5.1 The estate have taken into account the land terrain, drainage and road systems in planning the 2023 replanting.	Complied
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	<ul> <li>There is no excessive planting on marginal soil. Site visit at Rengam Estate found that there is a forest reserve was conserve in the estate at P17/03.</li> <li>The management has addressed in the Agricultural Manual under chapter as follows: <ol> <li>A07 – Terrace and Platform Construction</li> <li>A07A – Palm Lining and Terrace</li> <li>A08 – Harvester Path Construction</li> <li>A17 – Protection of Natural Water Courses and</li> <li>A18 – Water Management Plan in Peat Area.</li> </ol> </li> </ul>	Complied

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RSPO P&C Public Summary Report

#### Revision 15 (Nov 2023)

7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	assessment	The Agronomy Advisory and Services Department conducted assessment and provided the estates with topography maps. Sampled topography information at estates sited as follows:					
		Degree	Tereh Selatan Estate	Rengam	Selai Estate	Sg Tawing		
		0°-2°	25.03	12.25	39.8	22.66		
		2°-6°	53.95	53.74	48.13	42.48		
		6°-12°	20.08	31.89	12.07	26.65		
		12°-20°	0.94	2.12	0.61	6.94		
		20°-25°	0.00	0.00	0.01	1.00		
		>25°	0.00	0.00	0.00	0.27		
Criteri	on 7.7: No new planting on peat, regardless of depth after 15 November 20	)18 and all pe	atlands are ma	anaged respon	sibly.			
7.7.1	<b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	(GFW)	– Ma	alaysia	peat	Forest Watch lands (	Not Applicable	
	- Critical (Major) compliance -	https://data 98490b85d3 all estate vis						
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.	(GFW)	– Ma	alaysia	peat	Forest Watch lands (	Not Applicable	
	PROCEDURAL NOTE:		is available at					

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### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

7.7.3	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 - (C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	As confirmed through site visit, and through Global Forest Watch (GFW) – Malaysia peat lands ( <u>https://data.globalforestwatch.org/datasets/8d8462fca7b74b2985</u> <u>98490b85d3bd44_9/explore</u> ), there is no peat area is available at all estate visited. Thus this indicator is not applicable	Not Applicable
7.7.4	<ul> <li>(C) A documented water and ground cover management programme is in place.</li> <li>- Critical (Major) compliance -</li> </ul>	As confirmed through site visit, and through Global Forest Watch (GFW) – Malaysia peat lands ( https://data.globalforestwatch.org/datasets/8d8462fca7b74b2985 98490b85d3bd44 9/explore), there is no peat area is available at all estate visited. Thus this indicator 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 crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition. - Critical (Major) compliance -	(GFW) – Malaysia peat lands ( https://data.globalforestwatch.org/datasets/8d8462fca7b74b2985 98490b85d3bd44_9/explore), there is no peat area is available at all estate visited. Thus this indicator is not applicable	Not Applicable

**RSPO P&C Public Summary Report** 

#### Revision 15 (Nov 2023)

7.7.6	<b>(C)</b> All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance. - Critical (Major) compliance -	As confirmed through site visit, and through Global Forest Watch (GFW) – Malaysia peat lands ( https://data.globalforestwatch.org/datasets/8d8462fca7b74b2985 98490b85d3bd44 9/explore), there is no peat area is available at all estate visited. Thus this indicator is not applicable	Not Applicable
7.7.7	<b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance. - Critical (Major) compliance -	(GFW) – Malaysia peat lands ( <u>https://data.globalforestwatch.org/datasets/8d8462fca7b74b2985</u> <u>98490b85d3bd44 9/explore</u> ), there is no peat area is available at all estate visited. Thus this indicator is not applicable	Not Applicable
Criterio	<b>n 7.8:</b> Practices maintain the quality and availability of surface and ground	water	
7.8.1	<ul> <li>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:</li> <li>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</li> <li>b) Workers have adequate access to clean water.</li> <li>Minor compliance -</li> </ul>	The operating units has established a water management plan	Complied

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

proc The thro wat sam	3.93 L/ton FFB production, for Mutiara Estate and 0.21 L/ton FFB production for Tereh Utara Estate. The workers were provided with adequate access of clean water through water treatment plan. The estate conducted the drinking water analysis by 3 <sup>rd</sup> party lab once every 6 months. For river water sampling on monthly basis. Reviewed the water sampling records as follow:						
1.	<ul> <li><u>Tereh Palm Oil Mill</u></li> <li>Drinking Water Analysis         <ul> <li>Latest drinking water analysis was conducted on 07/06/2023.</li> <li>Refer report no. LW/437(1-2)/23. The results of treated water analysis as the following:</li> </ul> </li> </ul>						
	Parameter	Limit					
	рН	5.8	7.3	6.5 – 9.0			
	Turbidity	0.93	0.77	5			
	Aluminium	0.38	ND (<0.2)	0.2			
	Free Residue	0.00	1.4	0.2 -5			
	E-coliND (<10)ND (<10)Nil2. The river water analysis was conducted on 04/09/2023 with the report dated 14/09/2023 with report no: EI/2023/09/538.						

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

		stream and downstream at he result is following –
Parameter	Upstream	Downstream
BOD	39	52
COD	26	46
AN	3.54	2.58
pН	4.4	6.8
of treated water Water Quality	Analysis LW/438(1-2)/23 dat analysis was within p Standard, Ministi	permissible limit of Drinking y of Health Malaysia
<ol> <li>Drinking Water A Refer report no. of treated water Water Quality Engineering Sen</li> <li>River water anal a. WI/2023/10 b. WI/2023/07 c. WI/2023/07 The results of ri</li> </ol>	Analysis LW/438(1-2)/23 dat analysis was within p Standard, Ministr vices Division, Year 2 lysis /626 dated 10/10/20 /466 dated 25/09/20 /342 dated 21/08/20	)23 )23 )23 /as within permissible limit
<ol> <li>Drinking Water A Refer report no. of treated water Water Quality Engineering Sen</li> <li>River water anal a. WI/2023/10 b. WI/2023/07 c. WI/2023/07 The results of ri</li> </ol>	Analysis LW/438(1-2)/23 dat analysis was within p Standard, Ministr vices Division, Year 2 lysis /626 dated 10/10/20 /466 dated 25/09/20 /342 dated 21/08/20 ver water analysis w er Quality Standards	permissible limit of Drinking y of Health Malaysia; 2010. 023 023 023 vas within permissible limit

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Page 141 of 171

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

	b. WI/2023/08/503 dated 16/08/2023						
	The results of river water analysis was within permissible limit of National Water Quality Standards for river class II/III						
	<u>ai Estate</u>	A 1 -					
1.	Drinking Water			25/25/2222			
				on 25/05/2023. of treated water			
	analysis as the		23. The results				
	Parameter	Result - Inlet	Result -	Limit			
	Parameter	Result - Iniet	Treated				
		ГО		6.5 – 9.0			
	рН	5.8	7.1	0.5 - 9.0			
	Turbidity	0.78	0.63	5			
	Aluminium	ND (<0.2)	ND (<0.2)	0.2			
	Free Desidue	0.00	1.2				
	Free Residue	0.00	1.2	0.2 -5			
	E-coli	ND (<10)	ND (<10)	Nil			
			( ) _ ( )				
2.				03/10/2023 with			
				NI/2023/10/596.			
		en is conducted vith DOE. Samp		d downstream at			
	Parameter	Upstream	Downstream	Limit			

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

	Nitrate Nitrogen	0.05	0.12	7
	Phosphorus	0.05	0.08	0.2
<u>Sc</u>	<u>g TawingEstate</u>			
1.		water analysis LW/488(1-2)/2		on 25/05/2023. of treated water
	Parameter	Result - Inlet	Result - Treated	Limit
	рН	5.5	7.1	6.5 – 9.0
	Turbidity	53.4	2.01	5
	Aluminium	0.23	ND (<0.2)	0.2
	Free Residue	0.00	1.8	0.2 -5
	E-coli	ND (<10)	ND (<10)	Nil
2.	the report date The sample tak	d 08/09/2023 w	ith report no: \ at upstream an	05/09/2023 with NI/2023/09/521. d downstream at is following – Limit

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

			Nitrate Nitrogen	0.99	1.22	7	
			Phosphorus	<0.05	<0.05	0.2	
7.8.2	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	prot the Wat	tection of water Agricultural Ma	procedures for the h are documented in Protection of Natural cations for the river	Complied		
	provided there is no evidence of environmental deterioration having occurred during the previous cycle.	Riv	ver size		Reserve area	a on each side (M)	
	- Critical (Major) compliance -	>4	<del>1</del> 0m		50m		
		Be	etween 20m – 4	l0m	40m		
		Be	etween 10m – 2	20m	20m		
		Be	etween 5m – 10	)m	10m		
		<5	5m		5m		
			stated in the pro e area for eithe			allowed in the buffer	
		Tere	eh Selatan Esta	te			
		Sg. clea palr	Sembrong at arrly demarcated	field P07/01 a with white an	and P06/03, th d colour pole a	nrough the estate to he buffer zone was and blue ring ant the ion along the buffer	

## RSPO P&C Public Summary Report

### Revision 15 (Nov 2023)

		zone dated 20/02/202 on chemical handling spraying at buffer zon Site visit at buffer zon along the buffer zone <u>Selai Estate</u> The river buffer zone colour ring at the palm the HCV water catchn was conducted on 10/	23. Training discussed g and area of sprayi e area is mentioned. he area found that the area. was clearly demarcate n trunks as sighted at fi nent area. Training on 04/2023.	ving training at buffer on the safe operating ng is mentioned. No re is no spraying mark ed with blue and white eld P09/01 adjacent to the chemical handling te visit at buffer zone	
7.8.3	<ul> <li>Mill effluent is treated to be in compliance with national regulations.</li> <li>Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</li> <li>Minor compliance -</li> </ul>	Mill effluent is treated cooling pond, through aerobic treatment, be effluent through the effluent water test ond the final discharge (da is taken as the followi	Complied		
		Parameter	Result	Limit	
		BOD	355	2500	
		COD	2534	N/A	
		Ammonical Nitrogen	232	N/A	
		Total Nitrogen	297	N/A	

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Page 145 of 171

## RSPO P&C Public Summary Report Revision 15 (Nov 2023)

r							
		S	Suspended Sol	id 2	060	N/A	
		Т	Total Solid	1	1556	N/A	
		þ	эΗ		8.4	N/A	
		C	Dil and Grease		4	N/A	
		A	Alkalinity	4	050	N/A	
		Re Ya	egulation 13 c ang Ditetapkar	of Peraturan – I	Peraturan Alam Da Sawit) 1977	(DOE) through the Sekeliling (Premis , which stated only	
		is		er sampling poir		naintain, no leakage here are no effluent	
						efer the calibration ty until 12/07/2024	
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -			rs the water co onitoring record		on monthly basis.	Complied
			Month FY 2023	Water cons	sumption per FF (L/FFB)	B processed	
				Processing	Domestic	Total	
			Jan	1.00	0.49	1.49	
			Feb	1.02	0.49	1.51	
			Mar	1.31	0.60	1.91	

## RSPO P&C Public Summary Report Revision 15 (Nov 2023)

			A	1 22	0.52	1 75	
			Apr	1.22	0.53	1.75	
			Мау	1.11	0.34	1.46	
			Jun	1.54	0.29	1.83	
		-	Jul	1.03	0.25	1.28	
			Aug	0.98	0.21	1.19	
		-	Sep	1.30	0.21	1.51	
			Oct	N/A	N/A	N/A	
			Nov	N/A	N/A	N/A	
			Dec	N/A	N/A	N/A	
			Average	1.17	0.34	1.51	
				umption for mill 20L/ton FFB proc		acceptable as the	
Criterio	n 7.9: Efficiency of fossil fuel use and the use of renewable energy is optim	nised	d				
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	est				e energy has been ementation records	
				nit monitor the c ample of records		FFB production on	
		Tei	reh Palm Oil N	4ill			
			Mo	nth	Diesel /	/ mt FFB	

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January – December 2022	250,332 – 0.70 l/ffb
January 2023	1.14
February 2023	1.32
March 2023	1.29
April 2023	0.58
May 2023	0.54
June 2023	0.62
July 2023	0.28
August 2023	0.36
September 2023	0.55
Fereh Selatan Estate	
Month	Diesel / mt FFB
January 2023	9.58
February 2023	11.41
March 2023	8.98
April 2023	5.55
May 2023	2.65
June 2023	3.44
July 2023	1.16

## RSPO P&C Public Summary Report Revision 15 (Nov 2023)

1	1	
	August 2023	3.60
	September 2023	2.79
	Rengam Estate	
	Month	Diesel / mt FFB
	January – December 2022	6.51 - 284697
	January 2023	6.38
	February 2023	6.36
	March 2023	7.41
	April 2023	9.20
	May 2023	8.98
	June 2023	9.48
	July 2023	8.97
	August 2023	8.95
	September 2023	11.86
		available at Rengam Estate – with the year 2022 and todate 2023.
	Month	Diesel / mt FFB
	January – December 2022	4.54 - 386926
	January 2023	6.49

## RSPO P&C Public Summary Report Revision 15 (Nov 2023)

February 2023	5.72
March 2023	6.81
April 2023	8.34
May 2023	5.67
June 2023	5.54
July 2023	4.40
August 2023	3.86
September 2023	3.45
Sg Tawing Estate	
Month	Diesel / mt FFB
January – December 2022	6.24 - 218035
January 2023	6.44
February 2023	8.43
March 2023	10.51
April 2023	8.44
May 2023	9.96
June 2023	7.84
July 2023	7.55
August 2023	5.49

## RSPO P&C Public Summary Report Revision 15 (Nov 2023)

		September 2023	5.57	
	<b>7.10:</b> Plans to reduce pollution and emissions, including greenhouse g d to minimise GHG emissions.			evelopments are
7.10.1	(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported. - Critical (Major) compliance -	gaseous emissions to air and co Tools and systems used include for air emissions, water quality regulations and SW disposal we Water samples were regularly tal environment officer in charge an DOE requirements at final discha Monitoring of the GHG quantity Calculator Version 4.0 which is s Based on verification of variou PalmGHG Calculator was correct The GHG calculator were captur there are a total of 363.03 m Kabong Estate). There are no Estate during the current licens date). Hence the reason of detai	was done through RSPO PalmGHG submitted to the RSPO Secretariat. us record, the data in the RSPO	Complied
7.10.2	<ul> <li>(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).</li> <li>Critical (Major) compliance -</li> </ul>		alm Oil Mill and Supply Base since	Complied

### RSPO P&C Public Summary Report Revision 15 (Nov 2023)

#### Complied 7.10.3 The environmental management practices at the mill, in alignment (C) Other significant pollutants are identified and plans to reduce or with Johor Plantation Berhad's commitment outlined in the minimise them implemented and monitored. Environmental Policy, exhibit a thorough approach to pollution - Critical (Major) compliance control. The identification of significant pollutants during the environmental impact assessment has been translated into detailed plans documented in the Environmental Management Plan. The implementation of the management plan is diligently monitored by an appointed individual, with specific time frames set for completion. The review of the plan's implementation reveals the following key practices: 1. Daily monitoring of Electrostatic Precipitator (ESP) performance ensures continuous assessment of emissions control, as evidenced by the detailed review of ESP Performance Monitoring Data Recording. 2. Regular stack sampling, conducted biannually, provides comprehensive insights into emissions control measures, as demonstrated by the latest stack sampling on 27/06/2023. 3. The mill employs a systematic approach to inspecting tanks and machinery, addressing concerns related to leakage and spillage. Periodic inspections, conducted monthly, weekly, and daily, are documented, ensuring a proactive stance on preventing environmental hazards associated with vehicles and machinery. 4. Responsible disposal of mill by-products, such as fibre and shell, through sale to buyers and utilization as boiler fuel, exemplifies a sustainable waste management strategy. In summary, the mill's commitment to pollution control is reflected in the proactive and systematic environmental management practices. The implementation of measures, along with the ongoing monitoring and inspection, underscores a dedication to upholding

## RSPO P&C Public Summary Report

### Revision 15 (Nov 2023)

		environmental standards and minimizing the environmental footprint of the mill's operations.	
Criterio	<b>7.11:</b> Fire is not used for preparing land and is prevented in the manage	ed area	
7.11.1	<b>(C)</b> Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	According to the Environmental Policy of Johor Plantation Berhad, signed by the Managing Director, the company explicitly expresses its commitment to adopting zero burning techniques during land preparation for both new planting and replanting programs. This commitment is contingent upon adhering to the guidelines outlined for the implementation of the ASEAN policy for zero burning. This stance reflects the company's dedication to environmentally responsible practices in the context of land preparation activities.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	Johor Plantation Berhad has implemented a comprehensive Fire Prevention and Control Procedure, dated 01/08/2020. Each operating unit within the organization has formed a dedicated fire prevention team. In alignment with criterion 3.7.2, awareness training on Emergency Response Procedures (ERP) has been successfully conducted.	Complied
		Moreover, to ensure transparency and stakeholder involvement, the fire prevention plan has been effectively communicated during stakeholder meetings. This proactive approach underscores the commitment of Johor Plantation Berhad to fire prevention measures and the inclusion of stakeholders in promoting a safer and more resilient operational environment.	
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	The operating units demonstrate a commitment to transparency and safety by effectively communicating the fire prevention plan and control measures to all stakeholders during meetings. Upon reviewing the minutes of Stakeholder consultation meetings, it has been verified that comprehensive discussions and clear communication regarding fire prevention details were conducted.	Complied

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## RSPO P&C Public Summary Report

### Revision 15 (Nov 2023)

		This ensures that all relevant stakeholders are well-informed and engaged in understanding the fire prevention measures, contributing to a collective effort in maintaining a secure operational environment.	
	<b>n 7.12:</b> Land clearing does not cause deforestation or damage any area r prest. HCVs and HCS forests in the managed area are identified and protect		h Carbon Stock
7.12.1	<ul> <li>(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.</li> <li>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</li> <li>Critical (Major) compliance -</li> </ul>	Verified through the assessment of sampled estates, it has been confirmed that since 2018, no land clearing activities for plantation expansion have occurred that would result in harm to primary forests or encroachment upon areas designated for protection under High Conservation Values (HCVs) or High Conservation Stock (HCS) forests.	Complied
7.12.2	<ul> <li>(C) HCVs, HCS forests and other conservation areas are identified as follows:</li> <li>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.</li> <li>b) Any new land clearing (in existing plantations or new plantings) after</li> </ul>	<ul> <li>Johor Plantation Berhad has undertaken High Conservation Value (HCV) assessments for all operating units, and the findings have been documented in the following reports:</li> <li>1. Biodiversity assessment of Tereh Selatan Estate dated 04/09/2015.</li> <li>2. Papid Biodiversity Accessment of Eitheen Oil Palm Plantations of Accessment of Eitheen Oil Palmatheen Oil P</li></ul>	Complied
	<ul> <li>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.</li> <li>PROCEDURAL NOTE:</li> </ul>	<ol> <li>Rapid Biodiversity Assessment of Fifteen Oil Palm Plantations of Kulim (M) Berhad Final Report dated February 2013, Part two: fact sheets: Selai.</li> <li>Rapid Biodiversity Assessment of Fifteen Oil Palm Plantations of Kulim (M) Berhad Final Report dated February 2013, Part two: fact sheets: Mutiara and Sg. Sembrong.</li> </ol>	
	Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019). - Critical (Major) compliance -	These assessments signify a proactive approach by Johor Plantation Berhad in evaluating and documenting the HCV within their operating units, with the action plan for each HCV area are details for each estate.	

## RSPO P&C Public Summary Report Revision 15 (Nov 2023)

7.12.3	Indicator is not applicable in Malaysia context	N/A	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 -	<ul> <li>The estates have implemented a comprehensive Biodiversity Improvement Plan, strategically divided into immediate action plans and long-term strategies. The plan meticulously outlines specific actions, completion dates, and the designated individuals responsible for implementation. The plan were develop with the consultation of stakeholders with input received during the stakeholder meeting.</li> <li>The sampled implementation of the management plan was scrutinized with the following key findings: <ol> <li>Continuous Animal Sighting and Reporting: The sampled estates consistently conducted animal sighting activities and diligently reported their findings to the Sustainability and Innovation Department on a monthly basis. The records for May, June, July, August, and September 2023 revealed the presence of various wildlife, including Wild Boar, Eagle, Hornbill, Snakes, Monitor Lizards, and Jungle Fowl.</li> <li>HCV Monitoring on Monthly Basis: The estates sampled demonstrated a proactive approach by conducting High Conservation Value (HCV) monitoring on a monthly basis. This monitoring encompassed observation and swift actions to address any issues identified during the process. The records for the months of May, June, July, August, and September 2023 were thoroughly reviewed, highlighting a commitment to ongoing monitoring and intervention.</li> </ol> </li> <li>Establishment of Buffer Zones: The sampled estates have established buffer zones for main drains and river flows, emphasizing their commitment to environmental conservation. These buffer zones are clearly demarcated with blue and white poles and blue and white rings at the palm trunks, showcasing</li> </ul>	Complied

## RSPO P&C Public Summary Report

### Revision 15 (Nov 2023)

		a tangible effort to protect and preserve these critical ecological areas.	
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.	The audit focused on assessing the rights of local communities in various conservation areas, including High Conservation Value (HCV) areas, High Conservation Stock (HCS) forests identified post-15/11/2018, peatland, and other designated conservation zones. Key observations and findings are as follows:	Complied
	- Minor compliance -	1. Documentation Review: Thorough scrutiny of relevant documentation revealed clear records documenting the rights of local communities in HCV areas and conservation zones.	
		2. Interview with Stakeholders: Extensive interviews with local community representatives, estate management, and other stakeholders highlighted a robust understanding among local communities regarding their rights within conservation areas. There was a shared acknowledgment of the importance of active local community involvement in the maintenance and management of these areas.	
		3. Verification of Agreements: Solid evidence supported negotiated agreements between the estate and local communities, adhering to Free, Prior, and Informed Consent (FPIC) principles. These agreements delineated terms and conditions governing local community participation in conservation areas. The negotiation process actively involved local communities, securing their consent with a comprehensive understanding of the implications.	
		4. Involvement in Maintenance and Management: Local communities actively participated in the maintenance and management of the conservation areas, encompassing activities such as monitoring, protection, and sustainable resource utilization. These activities aligned with the terms stipulated in	

## RSPO P&C Public Summary Report Revision 15 (Nov 2023)

		the negotiated agreements. In conclusion, there has been no reduction in the rights of local communities within the specified conservation areas. The evidence, including negotiated agreements obtained through FPIC, indicates that the estate has successfully fostered the engagement of local communities in the maintenance and management of these areas, in compliance with RSPO requirements.	
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. - Minor compliance -	The estates' management actively promotes awareness on High Conservation Value (HCV) and Rare, Threatened, and Endangered (RTE) species during morning briefings and training sessions for workers. Noteworthy training sessions, including Spraying and Chemical handling at Selai Estate on 10/04/2023, HCV and buffer zone training for sprayers at Tereh Selatan Estate on 06/03/2023, and Prohibition of hunting RTE wildlife training on 07/04/2023, have been reviewed.	Complied
		In addition, the estates visited have strategically placed signboards at various locations, such as the office compound, muster ground, housing area, and HCV area, conveying the prohibition of capturing, harming, collecting, or killing RTE species. This comprehensive approach reflects a commitment to raising awareness and enforcing conservation measures within the estates.	
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. - Minor compliance -	The audit findings confirm that, since 15/11/2018, there have been no new identifications of significant conservation areas in the three sampled estates. Daily field supervision is carried out by both staff and executives to ensure continuous monitoring of these areas. Animal sightings are consistently engaged in by the estates, with monthly reports being provided to the Sustainability and Innovation Department. Records spanning from May to October 2023 demonstrate the presence of diverse wildlife in these estates,	Complied

## RSPO P&C Public Summary Report

### Revision 15 (Nov 2023)

		including Jungle Fowl, Snakes, Monitor Lizards, Hornbills, Crows, Kingfishers, Wild Boars, and Owls.	
7.12.8	<ul> <li>(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.</li> <li>- Critical (Major) compliance -</li> </ul>		Complied

### **Appendix B: GHG Reporting Executive Summary**

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

Emission per product	tCO <sub>2</sub> e/tProduct
СРО	0.51
РКО	0.51

Production	t/yr
FFB Process	332,370.51
CPO Produced	69217.99
PKO Produced	18254.18

Extraction	%
OER	20.83
KER	5.49

Land Use		На
OP Planted Area		32284.25
OP Planted on peat		1366.41
Conservation (forested)		57.05
Conservation (non-forested)		366.32
	Total	34074.03

#### **Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO2e / FFB	tCO₂e	tCO <sub>2</sub> e / FFB	tCO₂e	tCO <sub>2</sub> e / FFB	tCO₂e	tCO2e / FFB
Emission								
Land Conversion	163343.24	0.53	4554.47	0.47	12201.29	0.00	180099.00	1.00
CO <sub>2</sub> Emission from fertilizer	7372.17	0.02	290.70	0.03	1448.53	0.00	9111.40	0.05
NO <sub>2</sub> Emission	5682.83	0.02	463.58	0.04	945.91	0.10	7092.32	0.16
Fuel Consumption	6197.96	0.02	78.55	0.01	487.88	0.00	6764.38	0.03
Peat Oxidation	0.00	0.00	1630.34	0.17	0.00	0.00	1630.34	0.17
Sink								
Crop Sequestration	-154827.74	-0.50	-4317.03	-0.44	-11565.20	0.00	170709.97	-0.94
Conservation Sequestration	-451.07	-0.00	-3.34	-0.00	-3.58	0.00	-457.99	-0.00
Total	27317.39	0.09	2697.27	0.28	3514.83	0.00	33529.49	0.37

\*Note: Includes both estates and smallholders

# **bsi**

## **RSPO P&C Public Summary Report** Revision 15 (Nov 2023)

### **Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
Emission		
POME	22614.41	0.07
Fuel Consumption	781.04	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	-343.29	0.00
Sales of PKS	-12,373.59	-0.04
Sales of EFB	0.00	0.00
Total	10,678.57	0.03

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

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

\*This mill has no kernel crusher operation.

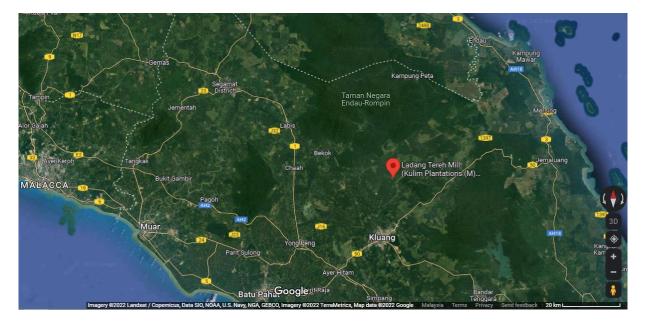
Palm Oil Mill Effluent (POME) Treatment:			
Divert to Compost (%) 0			
Divert to anaerobic diversion (%)	100		

POME Diverted to Anaerobic Digestion:			
Divert to anaerobic pond (%)	16		
Divert to methane captured (flaring) (%)	81		
Divert to methane captured (energy generation) (%)	3		

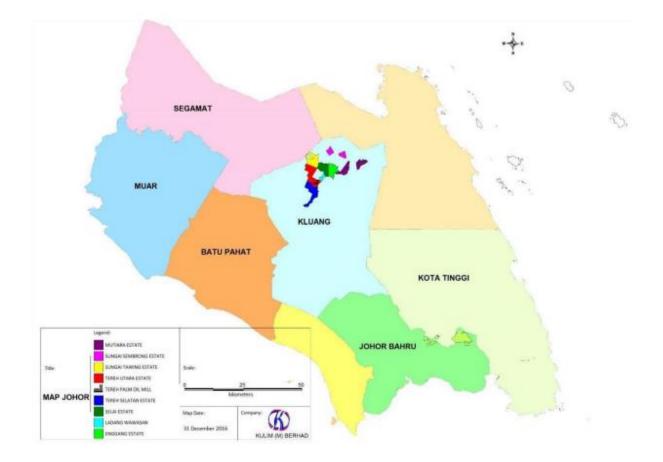
Notes: The GHG calculator were capturing the 2022 FFB activity, which there are a total of 363.03 mt diverted from peat area (Kuala Kabong Estate). There are no FFB diverted from Kuala Kabong Estate during the current license period (verified as of the audit date). Hence the reason of details of peat being in the report is due to the availability of crop from Kuala Kabong Estate in the year 2022.



### PF441 RSPO P&C Public Summary Report Revision 15 (Nov 2023)



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

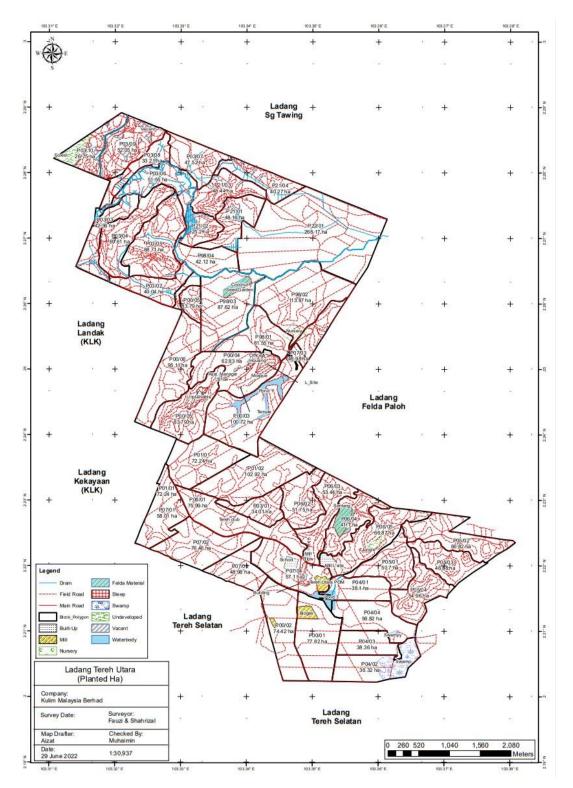


...making excellence a habit." Page 161 of 171

## RSPO P&C Public Summary Report Revision 15 (Nov 2023)

### Appendix D: Estate Field Map

Tereh Utara Estate

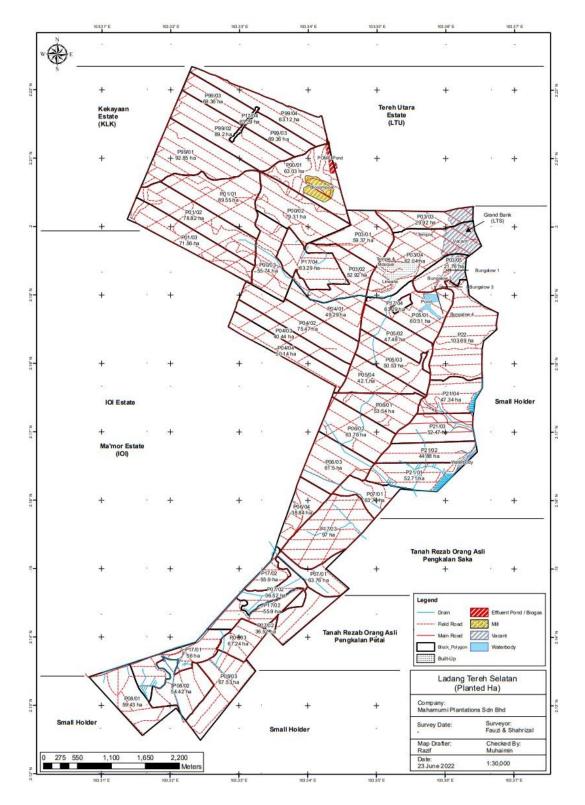


...making excellence a habit." Page 162 of 171



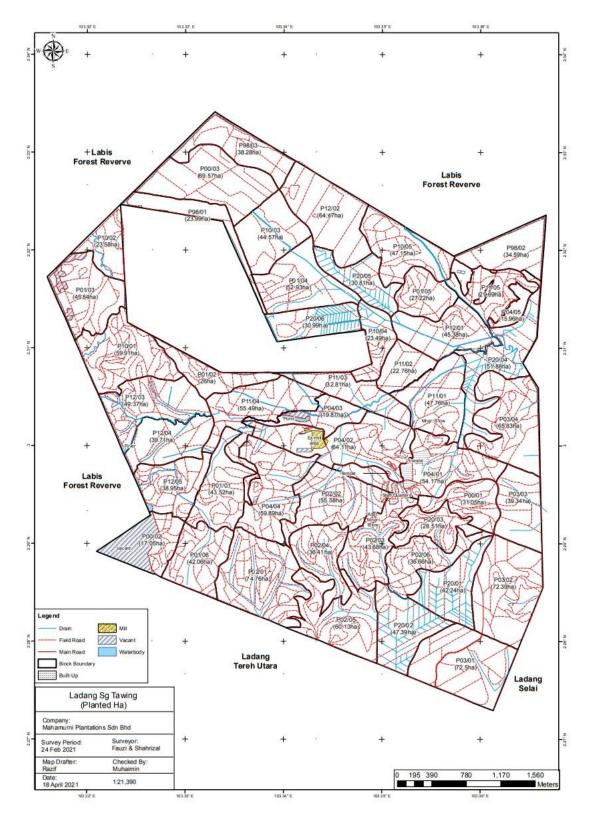
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### Tereh Selatan Estate



## RSPO P&C Public Summary Report Revision 15 (Nov 2023)

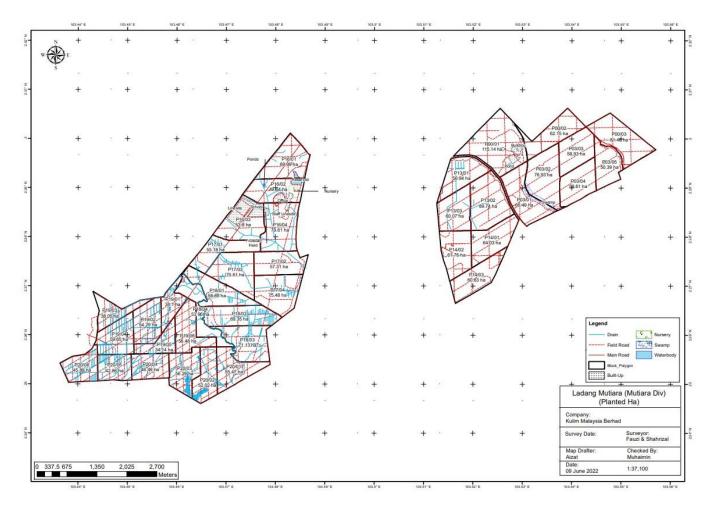
### Sungai Tawing Estate



...making excellence a habit." Page 164 of 171

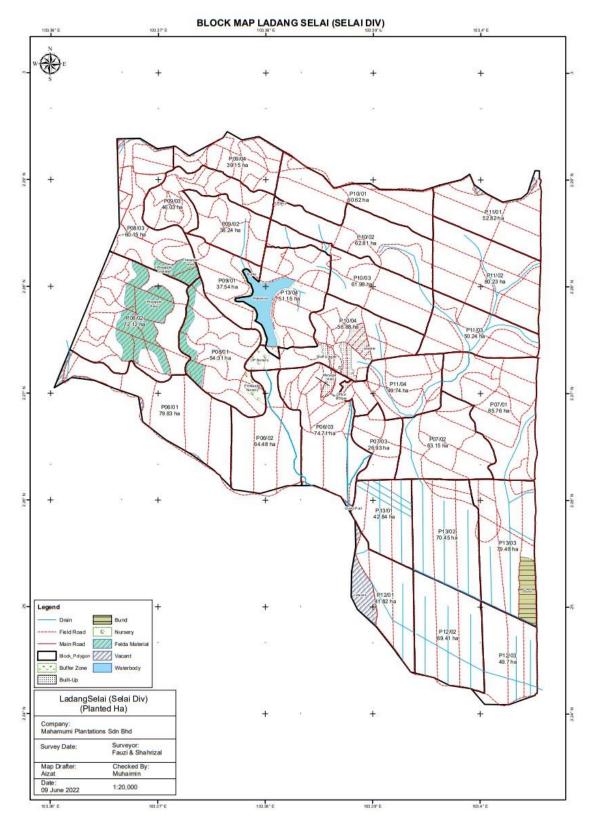
## RSPO P&C Public Summary Report Revision 15 (Nov 2023)

### Mutiara Estate



### PF441 RSPO P&C Public Summary Report Revision 15 (Nov 2023)

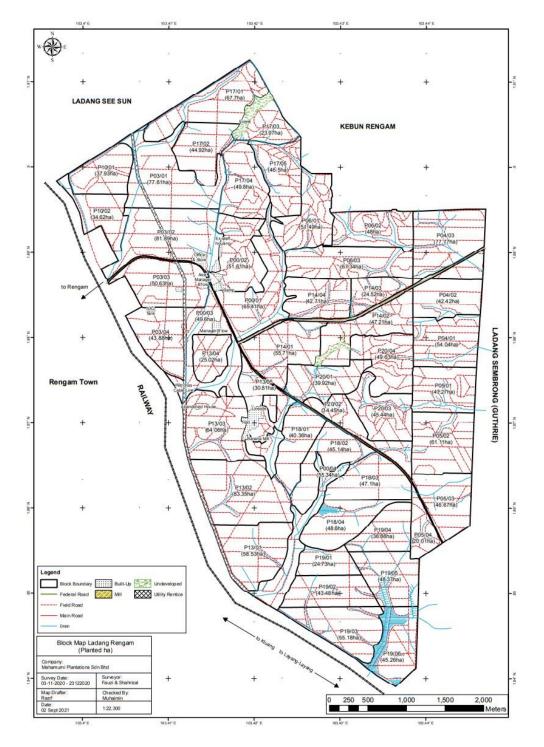
### Selai Estate



...making excellence a habit." Page 166 of 171

## PF441 RSPO P&C Public Summary Report Revision 15 (Nov 2023)

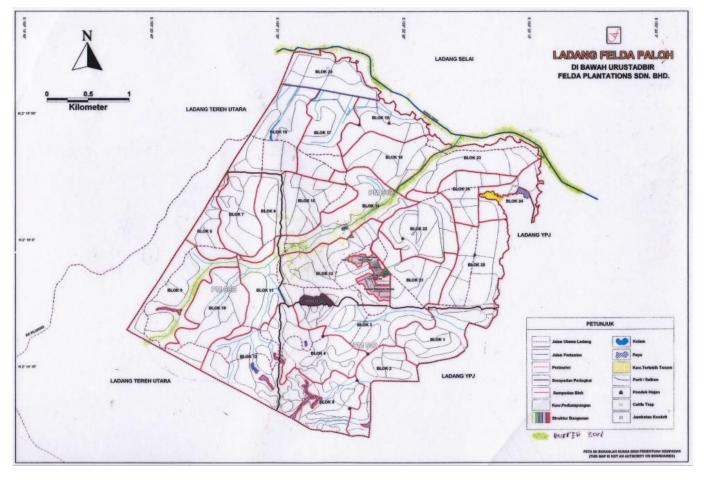
Rengam Estate





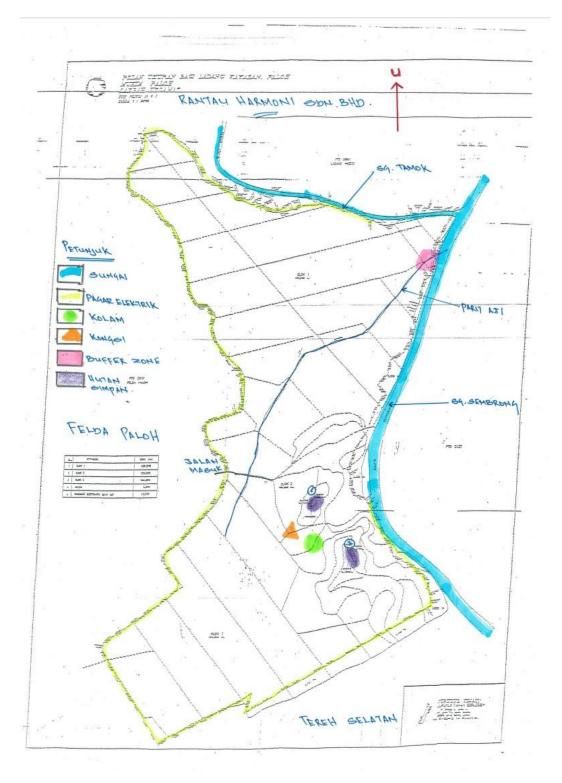
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### Felda Paloh Estate



### PF441 RSPO P&C Public Summary Report Revision 15 (Nov 2023)

### Wawasan Estate





## RSPO P&C Public Summary Report Revision 15 (Nov 2023)

### Appendix E: List of Smallholder Registered and/or sampled

Sampling Group	Current Certification	Scope Extension	Other:
Risk Factor Applied	N/A	N/A	N/A
Justification of Risk Factor Applied	N/A	N/A	N/A
Number of samples	N/A	N/A	N/A
Remarks	N/A	N/A	N/A

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

## RSPO P&C Public Summary Report Revision 15 (Nov 2023)

### **Appendix F: List of Abbreviations**

a.i BOD CB CHRA COD CPO CSPO CSPKO EFB EHS EIA EIA EIA EMS FFB	Active Ingredient Biochemical Oxygen Demand Certification Bodies Chemical Health Risk Assessment Chemical Oxygen Demand Crude Palm Oil Certified Sustainable Palm Oil Certified Sustainable Palm Kernel Oil Empty Fruit Bunch Environmental, Health and Safety Environmental Impact Assessment Environmental Management System Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
gps HCV	Global Positioning System 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 Pom	Palm Kernel Oil 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