

RSP0 – 2nd ANNUAL SURVEILLANCE ASSESSMENT (ASA2)

Kulim (Malaysia) Berhad
Head Office: K.B. 705, Ulu Tiram Estate, 80990 Ulu Tiram, Johor, Malaysia
Certification Unit: Sindora Palm Oil Mill KB 501, 86009 Kluang, Johor, Malaysia.

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Section 1 Scope of the Annual Surveillance Assessment

1. Company Details			
RSPO Membership Number	1-0006-04-000-00	Date	Member since 8 August 2004
Company Name	Kulim (Malaysia) Berhad		
Address	Head Office: K.B. 705, Ulu Tiram Estate, 80990 Ulu Tiram, Johor, Malaysia Certification Unit: Sindora Palm Oil Mill, KB 501, 86009 Kluang, Johor, Malaysia.		
Subsidiary of (if applicable)	Not Applicable		
Contact Name	Puan. Azmariah Muhamed		
Website	www.kulim.com.my	E-mail	azmariah@kulim.com.my
Telephone	+607-8611611/8622000	Facsimile	+607-8631084

2. Certification Information			
Certificate Number	SPO 612392	Original Issued Date	23/01/2009
		Expiry Date	22/01/2019
Scope of Certification	Sindora Palm Oil Mill Sindora Estate Sungai Papan Estate REM & Pasak Estate		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
ER 0551	ISO 14001:2004	SIRIM	20/09/2016
AR 1825	ISO 9001:2008	SIRIM	21/11/2017
EU-ISCC-Cert-DE119-60152024	ISCC	ASG Cert.	1/02/2016 (Recertification Planned in Jan.16)
ISCC-PLUS-Cert-60152024	ISCC	ASG Cert.	1/02/2016 (Recertification Planned in Jan.16)
A43172	MS1500:2009 (HALAL)	Dept. of Islamic Development Malaysia	30/04/2017
MPOB-CoP/MF/0003-1	Code of Good Milling Practice	MPOB	12/12/2015 (Recertification planned in Dec. 15)

3.Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS	
		Easting	Northing
Sindora Palm Oil Mill	Kluang, Johor, Malaysia.	103° 27' 44.31"	1° 59' 07.33"
Sindora Estate	Kluang, Johor, Malaysia.	103° 28' 17.97"	1° 57' 48.11"
Sungai Papan Estate	Kota Tinggi Johor, Malaysia.	104° 06' 21.80"	1° 31' 01.25"
REM Pasak Estate	Kota Tinggi, Johor, Malaysia.	103° 52' 54.96"	1° 42' 12.41"

4.Description of Supply Base						
Estate	Mature (ha)	Immature (ha)	Total Planted (ha)	Infrastructure & Other (ha)	Total Hectarage	% of Planted
Sindora Estate	2,030.41	1,368.02	3,398.43	520.68	3,919.11	86.71
Sungai Papan Estate	2,273.53	559.77	2,833.30	188.67	3,021.97	93.76
REM Pasak Estate	1,621.22	524.19	2,145.41	431.35	2,576.76	83.25
TOTAL	5,925.16	2,451.98	8,377.14	1140.70	9,517.84	88.02

Note: Area increased due to Sungai Papan Estate (previously under Sedenak Supply base) become Sindora supply base during ASA2. Re-survey of area was conducted and hectare statement revised as per survey.

5. Plantings Cycle					
Estate	Age (Years) & %				
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30
Sindora Estate	34.32	34.25	0	0	31.43
Sungai Papan Estate	15.85	52.14	24.43	0	7.58
REM Pasak Estate	7.62	29.66	8.07	39.31	15.33

6a. Certified Tonnage of FFB (Own Certificate Scope)			
Estate	FFB Tonnage / Year		
	Estimated (Nov 14 – Oct 15)	Actual (Nov 14 – Oct 15)	Forecast (Nov 15 – Oct 16)
Sindora Estate	44,177.00	47,057.03	41,419.00
Sungai Papan Estate	0	56,730.54	47,396.00
REM Pasak Estate	38,703.00	40,986.94	39,967.00
Rengam	46,595.00	4,997.00	8,373.00
Total - Own Supply Base	129,475.00	149,771.51	137,155.00
Ulu Tiram Estate	0	108.72	0
Basir Ismail Estate	0	27.82	0
Kuala Kabong Estate	0	354.66	0
Total – Certified Group Estate	0	491.20	0
GRAND TOTAL	129,475.00	150,262.71	137,155.00

6b. Non-Certified Tonnage of FFB (outside supplier)

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Independent FFB Supplier	Tonnage / Year		
	Estimated (Nov 14 – Oct 15)	Actual (Nov 14 – Oct 15)	Forecast (Nov 15 – Oct 16)
Nilai Megah	5,695	11,194.62	6,355
Guan Leng	37,000	9013	3940
Che Yu Trading	2,000	6415	2,400
Ree Fong	4,845	1500	4,885
Sri Mahtai	1,850	5359	2,300
Hup Guan	3,100	2090	3,780
Md. Sangidi	3,000	7478	3,600
Sri Misan	4,590	13035	4,750
Eng Lee Haut Trading	0	40,392	39356
TOTAL	62,080	96,477.28	71,366

7.Certified Tonnage

Mill	Estimated (Nov 14 – Oct 15)			Actual (Nov 14 – Oct 15)			Forecast (Nov 15 – Oct 16)		
	FFB	CPO	PK	FFB	CPO	PK	FFB	CPO	PK
Sindora Palm Oil Mill Capacity: 40mt/hr	129,475.00	26,348.00	6,819.00	150,262.71	30,833.91	8,745.29	137,155.00	28,391.00	7,886.00

Section 2 Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd.,
 (ASI Accreditation RSPO-ACC-19)
 B-08-01(East), Level 8,
 Block B, PJ8, No. 23
 Jalan Barat, Seksyen 8,
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BSI is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is RSPO Accredited (RSPO-ACC-19) since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta, Indonesia, Singapore, Bangkok and Australia which involve in RSPO Certification Program.

Assessment Methodology, Programme, Site Visits

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The ASA2 was conducted from 7 - 9 December 2015. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. These included consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

During this assessment Rengam estate was removed from the Sindora Palm Oil Mill supply base because the FFB from Rengam estate is being delivered to Sedenak Palm Oil Mill and included under Sedenak supply base. Sungai Papan estate is added to Sindora Palm Oil Mill’s supply base because the majority of the FFB from Sungai Papan estate is now supplied to Sindora Palm Oil Mill. REM estate and Pasak Division and all the FFB is supplied to Sindora Palm Oil Mill under the name of REM estate.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families, review of documentation and monitoring data. RSPO P&C MYNI 2014 and RSPO SCCS November 2014 and questionnaires were used to guide the collection of information. The comments made by external stakeholders were also taken into account in the assessment.

The Major Nonconformities that were assigned during the ASA1 which was closed during the last assessment was followed up to ensure it is remaining closed. All the previous nonconformities remains closed. The assessment findings for ASA2 are detailed in Section 3.3 and Appendix A.

This summary report is structured to provide detail of the assessment. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

This report was reviewed by Mr. Mohamed Hidhir, the BSI Report Reviewer prior to certification decision.

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

1.Assessment Program					
Name (Mill / Supply Base)	Year 1	Year 2	Year 3	Year 4	Year 5
Sindora Palm Oil Mill	√	√	√	√	√
Sindora Estate	√		√	√	
Sungai Papan Estate	√	√		√	√
REM & Pasak Estate		√	√		√

Tentative Date of Next Visit: 9 November 2016.

Total No. of Mandays: 9

BSI Assessment Team:**Muhammad Haris B. Abdullah – Team Leader**

He holds Master in Business Administration from the University Utara Malaysia and Bachelor of Business Administration (Hons) Majored in Human Resource Development from the Open University Malaysia. He has more than 3 years working experience in oil palm plantation and conducting social impact assessments of agriculture, agriculture best practices, and environmental impact assessment and workers welfare. He completed the RSPO Lead Auditor Training in April 2013 and passed the course. He is also passed the ISO 14001, ISO 9001, OHSAS 18001 Lead Auditor Training Courses and qualified as EICC auditor. He has completed International Sustainable and Carbon Certification (ISCC) Lead Auditor Training Courses. Recently he has attended the RSPO P&C Social and Labour Standards and the Mechanics of Social Auditing Workshop on 17 – 19 September in Bangkok, Thailand. He had assisted with conducting audits of oil palm plantation for more than 7 companies against the RSPO P&C in Indonesia and in Malaysia for the past 4 years. During this assessment, he assessed on the aspect of environment, Safety and Health, Legal, Social and community engagements, Stakeholders consultation, and workers welfare. He is able to speak and understand Bahasa Malaysia, English, Tamil and Bahasa Indonesia.

Ragu Samy – Team member

Ragu Erulappan is a fulltime employee with BSI Services Malaysia. He graduated from University Technology Malaysia. He attended internal RSPO training in 22 December 2014. He has completed ISO 9001:2008 Quality Management System Lead Auditor training, ISO 14001, ISO 18001 Lead Auditor Training. Currently he is an ISO 9001:2008, ISO 14001, ISO 18001, C-TPAT (Supply Chain Security) and GDPMD (Good Distribution Practice for Medical Devices) Lead Auditor. He has more than 5 years of auditing experience since August 2010 covering Environment, Safety and Health, Legal aspects in various industries. He is involved as Environment, Safety and Health Auditor during the RSPO Assessment. For this assessment he assesses Mill and Estate OSH, Legal, and Environment aspects. He is able to speak and understand Bahasa Malaysia, English and Tamil.

Senniah Appalasamy – Lead Assessor

He holds degree in Resource Economics from Agriculture University, Malaysia. He has vast experience in Plantation crop management covering oil palm plantation, rubber, cocoa and pepper for more than 10 years. He is also experience in manufacturing sector as a quality controller and production management. He is involved in RSPO implementation and assessment since 2008 as a team member and subsequently as a lead auditor with RSPO approved certification body covering assessment with RSPO P&C, RSPO SCCS, RSPO NPP and RSPO Group Certification in Malaysia, Indonesia and Thailand. He has completed ISO 9001:2008, Social Auditing Training by RSPO at Yogyakarta, RSPO SCCS awareness training, RSPO Lead Auditor Training Course, RSPO SCCS Lead Auditor Training Course, RSPO – RED Lead Auditor Training Course, International Sustainable Carbon Certification (ISCC) Lead Auditor training, Sustainability Report Assurance (SRA) Assessor Training, ISO 14001 Lead Auditor Training Course and OHSAS 18001 Lead Auditor Training Course. Besides RSPO, he is also qualified as ISCC lead auditor and SRA Lead Assessor. He have experience in other standards i.e. Global Gap Option 1 and 2 (Fruit, vegetable and aquaculture) and GMP B+ as team member. He assessed Mill and Estate best practices, supply chain, OSH, HCV, Legal, Environment and stakeholder interview.

Accompanying Persons: Not Applicable

Section 3 Assessment Findings

3.1 Details of audit results are provided in the following Appendix:

- RSPO P&C MYNI 2014 Summary of Findings – Appendix A
- Time Bound Plan – Section 3.2 below and Appendix B
- RSPO Supply Chain Certification Report – Appendix F

3.2 Progress against Time Bound Plan

Kulim (Malaysia) Berhad has 100% ownership in Kulim Plantations (Malaysia) Sdn Bhd. Kulim Plantations (Malaysia) Sdn Bhd has Tereh Palm Oil Mill and 2 estates i.e. Tereh Utara Estate and Tereh Selatan Estate which supply to certified Tereh Palm Oil Mill.

Kulim (Malaysia) Berhad has disposed interest in New Britain Palm Oil Ltd in 2014. Kulim (Malaysia) Berhad previously managed the Tunjuk Laut Palm Oil Mill and Siang Palm Oil Mill but since October 2013 this has been leased to third party operator (Awan Timur Resources and AA Sawit respectively). Kulim (Malaysia) Berhad no longer manages the operations and no management control. The leasing company has changed the name of the mill to Awan Timur Palm Oil Mill. Siang Estate previously supplies FFB to Siang Palm Oil Mill which was previously certified under Johor Corporation and now managed by third party. Siang Palm Oil Mill is not within Kulim (Malaysia) Berhad's management control. Siang Palm Oil Mill is under AA Sawit's management control and the name is changed to Siang Palm Oil Mill – Fruit Express.

Pasir Panjang Palm Oil Mill was under Johor Corporation, and acquired under Kulim (Malaysia) Berhad through Mahamurni Plantations Sdn Bhd in 2012. At the same time Kulim (Malaysia) Berhad has acquired Pasir Panjang Palm Oil Mill through Mahamurni Plantation Sdn Bhd. Pasir Panjang Palm Oil Mill enter time bound plan as per "work plan Kulim / Jcorp estate" document and due for certification in 2016. Since March 2015, all Jcorp estate is now supplied to Pasir Panjang Mill which will enter RSPO Certification 2016. However due to new restructuring starting January 2015, seven (7) estate will be under Kulim (Malaysia) Berhad namely Kuala Kabong, Ulu Tiram, Basir Ismail, REM (combined with Pasak Division/estate), Labis Bahru, Mutiara and Sungai Sembrong. All other operating unit will be under Mahamurni Plantation Sdn. Bhd.

Kulim (Malaysia) Berhad has 100% ownership in Mahamurni Plantations Sdn Bhd. Mahamurni Plantations Sdn Bhd have 3 palm oil mills i.e.: Sedenak Palm Oil Mill, Palong Palm Oil Mill, and Pasir Panjang Palm Oil Mill. Mahamurni Plantations Sdn Bhd also has 9 estates: Sedenak Estate, Sungai Papan which supply to certified Sedenak Palm Oil Mill; Mungka Estate, Kemedak Estate, Palong Estate, Ladang UMAC which supply to certified Palong Palm Oil Mill; Rengam Estate supply to certified Sindora Palm Oil Mill. Pasir Panjang Estate will supply to Pasir Panjang Palm Oil Mill, which due for certification by 2016.

Kulim (Malaysia) Berhad has 100% ownership in Selai Sdn Bhd. (Selai Estate and Enggang Estate) both supply to certified Tereh Palm Mill. Kulim (Malaysia) Berhad has 100% ownership in Sindora Berhad. Sindora Berhad has Sindora Estate supplying to certified Sindora Palm Oil Mill. Sungai Tawing Estate supplying to certified Tereh Palm Oil Mill. Kulim (Malaysia) Berhad has 94.49% ownership in Kumpulan Bertam Plantations Berhad. Kumpulan Bertam Plantations Berhad has Sepang Loi Estate supply to certified Palong Palm Oil Mill. Kulim (Malaysia) Berhad itself has 7 estates: Basir Ismail Estate, Ulu Tiram Estate, Kuala Kabong Estate supply to certified Sedenak Palm Oil Mill; Sungai Sembrong Estate and Mutiara Estate supply to certified Tereh Palm Oil Mill; REM Estate and Pasak division will supply to certified Sindora Palm Oil Mill; Labis Bahru Estate supply to certified Palong Palm Oil Mill.

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BSi concludes that Kulim has completed all of the commitments of its Time Bound Plan that relate to company owned and managed Palm Oil Mills and Estates. The progress with the Pasir Panjang Certification planned will be followed up. During the ASA2:

1. There is no any other isolated lapse in Time Bound Plan.
2. No systematic failures to proceed with implementation of the Time Bound Pan since first certified.
3. The changes in the Time bound Plan for Pasir Panjang Palm Oil Mill is acceptable because the company just took over the management control.

Kulim (Malaysia) Berhad has completed NPP for the new planting development in Indonesia at PT Wahana Semesta Karisma, PT Harapan Barito Sejahtera and PT Sawit Sumber Rejo on 12/8/2014 posted on the RSPO website's NPP Notification section. At the time of preparation of this Report, BSI is not aware of any new issues involving:

- a. Any unresolved significant land disputes;
- b. Any replacement of primary forest or loss of HCVs;
- c. Any labour disputes that are not being resolved through an agreed process;
- d. Any evidence of noncompliance with any law at any of the landholdings.

BSI considers that Kulim (Malaysia) Berhad complies with the RSPO requirements for Partial Certification rules.

3.3 Details of Findings

No new nonconformity was raised during this 2nd annual assessment.

Non-Conformity		
NCR #	Description	Category (Major / Minor)
-Nil-	Requirements:	-Nil-
	Evidence of Nonconformity:	
	Statement of Nonconformity:	
	Corrective Action Plan:	
	Status:	

Observation	
OBS #	Description
-Nil-	-Nil-

Positive Findings	
PF #	Description
1	The management has initiated the biogas project and expect completion by 2016. This will significantly reduce the greenhouse gas emission.
2	Communication and awareness among the field employees on OSH matters are continue to be

	maintained by all operating units.
Issues raised by Stakeholders	
<p>Internal and external stakeholders were consulted to obtain their views on Sindora Palm Oil Mill and supply base environmental and social performance and any issues of concern that they may have. External stakeholders were contacted by email and telephone to arrange meetings where practical and to seek their views on the environmental and social performance of the Mill and supply base. External stakeholders were interviewed at their premises where practical or they were invited to the Mill or the Estate. Internal stakeholders were interviewed in groups in the workplace or at their housing. Company management representatives were not present at any of the meetings. A list of stakeholders contacted is included at Appendix E.</p>	
IS #	Description
1	<p>Issues Contractors: Contractors confirm payment is prompt as per agreed contract. Contractor highlighted that the mill to consider prepare a place for non-muslim workers from their company to have their meal during fasting month.</p> <p>Management Responses Management had overlooked this issue and agreed to allow them to use the mill canteen during the fasting month.</p> <p>Audit Team Findings No other issues.</p>
2	<p>Issues Workers union secretary: No pending disputes or any wage issues. Company follow the NUPW/MAPA agreement and minimum wage requirement.</p> <p>Management Responses Management always encourage union representative and workers to meet them to resolve any issue immediately and open for discussion.</p> <p>Audit Team Findings No disputes were raised by workers interview with them which indicate that the freedom to join union and procedure to voice out grievances is implanted</p>
3	<p>Issues Foreign workers representative: No issue regarding pay and condition of work. The representative highlighted that they are treated equally. All foreign workers have access to all facilities similar to local workers.</p> <p>Management Responses The management treat all employees equally and no discrimination.</p> <p>Audit Team Findings No disputes were highlighted by foreign workers interviewed during field visit.</p>
4	<p>Issues Shopkeeper: Requested management to repair the damaged drain behind the shop. No pending disputes or any other issues.</p> <p>Management Responses Management aware of the drainage condition and already tendered the repairing works to contractor.</p> <p>Audit Team Findings Tender contract and related documents were sighted. No other issues.</p>

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3.3.1 Status of Nonconformities Previously Identified and Observation

All the previous Major nonconformities were followed up and remain closed. No minor nonconformity was raised during the last ASA1.

Non-Conformity		
NCR #	Description	Category (Major / Minor)
-Nil-	Requirements:	-Nil-
	Evidence of Nonconformity:	
	Statement of Nonconformity:	
	Action:	
	Status:	


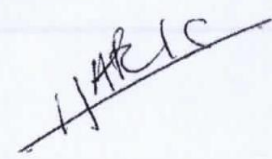
Observation	
OBS #	Description
-Nil-	-Nil-

3.3.2 Summary of the nonconformities and status

CAR Ref.	CLASS	ISSUED	STATUS
CR01	Minor	24/07/2008	Closed on 21/01/2010
CR03	Minor	27/07/2008	Closed on 21/01/2010
CR05	Minor	21/01/2010	Closed on 13/01/2011
CR06	Minor	13/01/2011	Closed on 05/11/2011
CR07	Minor	12/11/2012	Closed on 03/12/2013
CR10	Major	10/12/2013	Closed on 06/02/2014
CR11	Minor	10/12/2013	Closed on 25/01/2014
1123525M1	Major	13/11/2014	Closed on 10/01/2015
1123525M2	Major	13/11/2014	Closed on 10/01/2015

Assessment Conclusion and Recommendation:

It is concluded that Sindora Certification Unit and supply base complies with the RSPO P&C Malaysian National Interpretation (MY-NI 2014) and the RSPO Supply Chain Certification Standard (Nov 2014). It is recommended that the certification of Sindora Certification Unit is approved and continued.

Acknowledgement of Assessment Findings	Report Prepared by
Name: Madam Azmariah Muhamed	Name: Muhd. Haris Abdullah
Company name: Kulim (Malaysia) Berhad	Company name: BSI Services Malaysia Sdn Bhd
Title: Head of Sustainability Department	Title: Lead Auditor
Signature: 	Signature: 
Date: 15 January 2016	Date: 8 January 2016

Appendix A: Summary of the Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Commitment to Transparency			
Criterion 1.1:			
Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	Adequate information covering on environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making. Information on environmental, social and legal issues relevant to RSPO Criteria was made available to relevant stakeholders for effective participation in decision making. Publicly available documents such as land title, OSH plan, HCV documents, negotiation procedure, complaint records, RSPO public summary reports, EIA, Management Plans & Continuous Improvement Plans and company policies are available.	Complied
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	All operating units continue to maintain records of information request and response. Request for information are attended promptly and confirmed by stakeholders interviewed.	Complied
Criterion 1.2:			
Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			
1.2.1	Publicly available documents shall include, but are not necessary limited to: <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). - Major compliance –	Publicly available management documents covers Land titles, OHS plans, EIA, SIA, HCV documentation, Pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, RSPO Public Summary Report, company policies and Continual improvement plans. All operating units have individual documents and records to demonstrate compliance to this indicator. RSPO Public summary reports are publicly available on request at each certification unit and at the head office.	Complied
Criteria 1.3:			
Growers and millers commit to ethical conduct in all business operations and transactions.			

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Criterion / Indicator	Assessment Findings	Compliance
1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. -Minor compliance-	Policy committing to a code of ethical conduct and integrity available. This has been documented and communicated with employees. Complied
Principle 2: Compliance with applicable laws and regulations		
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.		

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Criterion / Indicator	Assessment Findings	Compliance
<p>2.1.1 Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p>	<p><u>Mill</u> a) Poison Ordinance, 1952 – Permit to Purchase, Store and Use of Sodium Hydroxide valid until 31/12/15. b) Peraturan- Peraturan Kawalan Bekalan 1974 Peraturan 9(2) – Diesel Permit valid until 27/8/16. c) EQA 1974 – Peraturan-Peraturan Kualiti Alam Sekeliling (Premis Yang Ditetapkan) (Minyak Kelapa Sawit Mentah) 1977 - Anerobik Pond No.1 & 2 Cleaning completed on 20/11/15. Sighted report submitted to DOE dated 24/11/15. d) EQA 1974 – Competent Person Certified Environmental Professional in the Treatment of Palm Oil Mill Effluent (CEPPOME) – Competent is the Assistant Manager. Sighted Competent Certificate dated 4/11/15. e) OSHA 1994 – Authorised Entrant & Standby Person for Confined Space – Competent Person is the Assistant Manager. Sighted NIOSH Training Card No. NW-HQ-AE-2433, valid until 28/5/16. f) FMA 1967 – 1st Grade Engine Driver Certificate available. Sighted No. Perakuan J224106. g) Akta Bekalan Elektrik – Competent Charge Man available. Sighted Competency Record No. PJ 1131245. h) USECHH 2000 – Occupational Medical Surveillance Program for Year 2015 has been conducted on 7/9/15 for e.g. Laboratories, Store, & Boiler Workers. Results shows no abnormal results and report recommended workers are fit to work at the chemical exposure areas. i) USECHH 2000 – Chemical Health Risk Assessment been conducted on 10/1/13. Chemical Register been prepared accordingly and submitted to DOSH on 8/1/15.</p> <p><u>Sungai Papan Estate</u> a) USECHH 2000 – Chemical Health Risk Assessment been conducted on May 2013. Chemical Register been prepared accordingly and submitted to DOSH on 30/1/15. b) Peraturan – peraturan Lembaga Minyak Sawit Malaysia (Perlesenan) 2005 – Seen License No. 570243002000 valid until 29/2/16. c) Peraturan- Peraturan Kawalan Bekalan 1974 Peraturan 9(2) – Diesel Permit valid until 23/2/16.</p> <p><u>REM Estate</u> a) Peraturan – peraturan Lembaga Minyak Sawit Malaysia (Perlesenan) 2005 – Seen License No. 501259002000 valid until 31/3/16. b) Peraturan- Peraturan Kawalan Bekalan 1974 Peraturan 9(2) – Diesel Permit (Pasak Division) valid until 11/10/16. c) USECHH 2000 – Chemical Health Risk Assessment been conducted on 4/2/13. Chemical Register been prepared accordingly and submitted to DOSH on 25/3/15.</p>	<p>Complied</p>
<p>2.1.2 A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -</p>	<p><u>Mill & Estates</u> All operating units maintain documented system for identifying, evaluating, reviewing and updating applicable regulations and other requirements.</p>	<p>Complied</p>

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2.1.3 A mechanism for ensuring compliance shall be implemented. - Minor compliance -	<u>Mill & Estates</u> Evaluation of legal requirements and compliance status with legal requirement is monitored by operating units, sustainability team, OHS Department and head office audit Department.	Complied
2.1.4 A system for tracking any changes in the law shall be implemented. - Minor compliance -	<u>Mill & Estates</u> Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Head Office. On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operations.	Complied
Criterion 2.2: The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.		
2.2.1 Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -	Land ownership such as land title and land lease documents is available. There is no change in the land ownership. All the land belongs to Kulim (Malaysia) Berhad. <u>Sungai Papan estate:</u> Holds 26 lease hold land titles. E.g: No.HSD 13177, HSD 13163, HSD 13176. <u>REM estate:</u> Holds 15 titles. 14 free hold and 1 lease land. E.g: PN 13369, G 91216, 49873.	Complied
2.2.2 Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	During the field visit it was noted that legal boundaries are clearly demarcated and visibly maintained throughout the estate. Mill is located inside the Sindora Estate and sharing the estate boundary.	Complied
2.2.3 Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	There is no land dispute in the certification unit and supply base at the time of audit. The land belongs to Kulim (Malaysia) Berhad. Land ownership documents verified.	Complied
2.2.4 There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	There is no land dispute in the certification unit and supply base at the time of audit. The land belongs to Kulim (Malaysia) Berhad. Land ownership documents verified.	Complied
2.2.5 For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	There is no land dispute in the certification unit and supply base at the time of audit. The land belongs to Kulim (Malaysia) Berhad. Land ownership documents verified.	Complied
2.2.6 To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	There is no land dispute in the certification unit and supply base at the time of audit. The land belongs to Kulim (Malaysia) Berhad. Land ownership documents verified.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
Criterion 2.3: Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.			
2.3.1	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).. - Major compliance -	The estate lands are legally owned and leased by the company. The existing estates are not encumbered by any customary land rights. Interview with the surrounding communities and stakeholders confirm no disputes.	Complied
2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. - Minor compliance -	The estate lands are legally owned by the company and no other users were identified within the land area.	Complied
2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	The estate lands are legally owned by the company and no other users were identified within the land area.	Complied
2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	The estate lands are legally owned by the company and no other users were identified within the land area.	Complied
Principle 3: Commitment to long-term economic and financial viability			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			

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3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -	Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains FFB yield, CPO, OER, and KER, costs of production, etc.	Complied
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	Sindora operating units have a long range replanting plan until 2041. <u>Sungai Papan estate:</u> 111.75ha has been replanted in 2015. The next replanting will be in 2017 for 214.90ha. <u>REM estate:</u> The next replanting will be in 2016 for 165.57ha.	Complied
Principle 4: Use of appropriate best practices by growers and millers			
Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.			
4.1.1	Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	Palm Mill holds SOP: Mill Operation Manual includes mill SOP and work instruction as a guidance document to operate the mill. Estates have a separate SOP and Estate Manual) covers land preparation, planting material, upkeep, harvesting, transport etc.	Complied
4.1.2	A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	Mill advisor and plantation Inspector make regular visit to evaluate the performance of the mill and estates. General Manager visits the estates on quarterly basis to review estate performance against Kulim Sustainability standard. <u>Mill:</u> Mill Advisor visit: 28/9/2015 DOE visit: 28/9/2015 DOSH visit: 25/8/2015 <u>Sungai Papan estate:</u> Plantation Inspector visit: 20-21 September 2015 (Ref. No.: MYH/LSP/No.2/2015) <u>REM Estate:</u> Plantation Inspector visit: 28-30 September 2015	Complied
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	The records of monitoring and the actions taken maintained for more than 12 months. Records were verified during the document review found compliance.	Complied
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	Sindora Palm Oil Mill weighbridge clerk verify and record third party FFB purchased by the mill.	Complied
Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -	Good agriculture practices which follows the group agriculture manual contains Standard Operating Procedures to ensure soil fertility is managed to a level that ensures optimal and sustained yield. Agronomist visits the estate to ensure good agriculture practices are maintained and provide fertilizer recommendations. <u>Sungai Papan estate:</u> Agronomy visit: 15-16 June 2015 (Report No.: 1/15) <u>REM Estate:</u> Agronomy visit: 20& 28 October 2015 (Report No.: 2/15)	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.2.2	Records of fertiliser inputs shall be maintained. - Minor compliance -	Fertilizer recommendation dated 3 rd November 2015 for 2016 was available. As for 2015, the recommendation was given on 6 th November 2014. Application records match the recommendation which has been completed in November 2015. Sample application checked: Kieserite 0.75kg/palm have been applied at Field No.P03. Fertilizer application records are available in the field costing book verified and found to be compliance.	Complied
4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	Leaf analysis result which shows the nutrient level was used as guidance for the fertilizer recommendation. Soil sampling was last done on 21/4/14 by Kulim Research and development department (UTCL Laboratory) (Report No.: S/1404/LSP/0153-0156). Leaf sampling was done on 11/5/15 (Report No.: LI/1505/LSP/0406-0415).	Complied
4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -	EFB application only applied to selected fields. Average about 40 - 45mt/ha EFB applied. POME application is carried out at fields near to the mill. Zero burning is carried out during replanting through chipping and residues applied back to field.	Complied
Criterion 4.3: Practices minimise and control erosion and degradation of soils.			
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	All the estates hold copies of soil map. Soil maps and field visit confirm that there is no fragile soil on the estates. Mostly are Rengam and Bungor series.	Complied
4.3.2	A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	Planting terraces had been constructed where slope >10°. Fields are established with cover crops such as <i>muccuna</i> and soft grasses and ferns.	Complied
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	Estate has implemented annual road maintenance programme. Example of programme checked at Sungai Papan and REM estates shows the map indicating road repairs and maintenance for the whole estate roads includes grading, compacting and stone application to strengthen the road surface.	Complied
4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -	There is no peat soil or soil categorised as problematic or fragile soil at all estates visited.	Complied
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	There is no peat soil.	Complied
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	There is no peat soil or soil categorised as problematic or fragile soil at all estates visited.	Complied
Criterion 4.4: Practices maintain the quality and availability of surface and ground water.			

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Criterion / Indicator	Assessment Findings	Compliance
4.4.1 An implemented water management plan shall be in place. - Minor compliance -	<p>All operating unit have water management plan. Implementation as per the plan covers water conservation and action plan to be taken during the drought season. The plan takes into account the efficient use of resources, ensure amongst other that the use of water did not impact on other users, avoid contamination of ground and surface water, and appropriate treatment of mill effluent. No flooding issues noted. Housing supplied with water tank and inspection carried out for any leakage or wastage. Field practice includes silt pits construction to retain water. Outgoing water monitoring to identify any adverse effect from the mill and estate activities conducted. Latest laboratory analysis results at Sungai Papan estate indicate (Test Report No.: WI/1511/0699-0702) dated 2/11/2015 analysed for nitrogen and phosphate due to the recent fertilizer application activities. Result shows less than 0.07mg/L nitrogen and phosphate in the sample. REM Pasak river water analysis dated 25/11/15 (Report No. WI/1511/0761, 0762). Result shows less than 0.4mg/L nitrogen and phosphate in the sample.</p> <p>There is an Integrated Water Management Plan which has been implemented. The plan takes into account the efficient use of resources, ensure amongst other that the use of water did not impact on other users, avoid contamination of ground and surface water, and appropriate treatment of mill effluent.</p> <p>Sindora operating unit monitors water quality of outgoing waters to identify any adverse effect from the mill and estate activities. The laboratory analysis results indicate (Test Report No.: WI/1510/0649-0652) dated 23/10/2015 all the specifications are within the permitted limit such as BOD below 100mg/l.</p>	Complied
4.4.2 Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -	<p>Estates assessed has prepared map showing riparian buffer zones and demarcated the areas prior to replanting for all the estates. Field inspection at Sungai Papan and REM Pasak Estates confirmed that the buffer zone beside the stream has been maintained.</p>	Complied
4.4.3 Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -	<p>Treatment of mill effluent carried out as per SOP and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD) is monitored. Latest effluent analysis dated 29/11/2015 (Report No.: EI/1511/1120-1122) by UTCL laboratory shows all parameters are within the approved limit.</p> <p>Regular monitoring was done on monthly basis and every quarterly via "Borang Penyata Suku Tahun" to DOE for compliance. The latest "Borang Penyata Suku Tahun" 3rd quarter of 2015 was sighted during the audit. Result was found in compliance with the regulatory limit.</p>	Complied
4.4.4 Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	<p>Mill has maintained monitoring on water usage for processing which recorded on daily and summarised month end. Average water usage was range from 0.54 – 0.36mt/mt of FFB processed.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.		
4.5.1 Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	Similar to last assessment, the IPM is documented in through standard operating procedures. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Barn owls <i>Tyto alba</i> has been introduced for biological control of rats. Barn owl boxes are constructed at the rate of 1 box to 20ha. Census record dated 28/9/15 found occupancy rate of 50%. Census records also show that there is no outbreak of leaf eating pest. Although there have been no outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators. The estates have planted beneficial plants such as <i>Cassia cobanensis</i> and <i>Turnera subulata</i> and <i>Antigonon leptopus</i> .	Complied
4.5.2 Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	IPM training is given by the Agronomist and plantation executives with qualification in agriculture. Interview with the staff confirm their understanding of the Kulim's IPM practices. Rat baiting and barn owl census training dated 26/2/2015 was given by assistant manager to the 17 workers.	Complied
Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment		
4.6.1 Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance -	Written justification is in the Standard Operating Procedures of all agrochemicals used. Selected products are specific to the target pest, weed and disease. The selection is also evaluated by the agronomist during his visit to the estate.	Complied
4.6.2 Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -	Records of pesticides and their active ingredients used, LD50, area treated, amount of a.i. applied per ha, and number of applications was maintained.	Complied
4.6.3 Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Kulim's Agriculture Manual. The implementation in the field is consistent with the manual. There is no prophylactic use of pesticides.	Complied

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4.6.4	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, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances. - Minor compliance -	At the time of assessment there were no class 1a or 1b pesticides. Company has ceased the use of paraquat since 1 March 2015. Alternatives such as Glyphosate were used. Complied
4.6.5	Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance -	Pesticide operators given training on the safe handling and application of the pesticides. Suitable personal protective equipment and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers. Complied
4.6.6	Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -	The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation. Agrochemical containers recycled for premix agrochemical. Complied
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	The quantity of agrochemicals required for various field conditions are documented and justified through agronomist advisory. Complied
4.6.8	Pesticides shall be applied aurally only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	No aerial spraying. Complied
4.6.9	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	No associated smallholders. Employees demonstrate knowledge and skills on pesticide handling. MSDS was displayed in local Bahasa Malaysia language at the agrochemical store for each chemical stored as well as a Work Instruction on safe handling for the easy understanding of the agrochemical handlers. Complied

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4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -	Domestic waste material are disposed properly at designated landfill and managed well as per the company procedures. The procedures are fully understood by workers and managers. Interview with workers and managers reveal that they are aware of the proper disposal and zero burning policy including domestic waste are not allowed to be burn. Management dispose waste material as per regulation for schedule waste and domestic waste.	Complied
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	<u>Sungai Papan Estate</u> Annual medical surveillance carried out for all operators as per CHRA. The last medical surveillance was done by OHD Doctor (DOSH Reg. No.: HQ/11/DOC/00/235) on 9 August 2015 and the result shows some of the workers need further check-up. The management has planned to arrange further follow up check up on the identified workers based on the medical surveillance report. <u>REM Estate</u> Annual medical surveillance carried out for all operators as per CHRA. The last medical surveillance was done by OHD Doctor (DOSH Reg. No.: HQ/11/DOC/00/235) on 11 October 2015 and the result shows some of the workers need further check-up. The management has planned to arrange further follow up check up on the identified workers based on the medical surveillance report.	Complied
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	Pesticide handlers and sprayers in the estates were noted to be men only. It was verified from records, field inspections and interviews that no pregnant or breast-feeding woman had been offered work as pesticide operator.	Complied
Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:			
4.7.1	A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. - Major compliance -	<u>Mill & Estates</u> Approved Health and Safety Policy dated since 2008 is displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the on-site safety officers and monitored by OSH Manager from Head Office.	Complied

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<p>4.7.2</p> <p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. - Major compliance -</p>	<p><u>Mill & Estates</u></p> <p>Risk assessment had been carried out on all operations where health and safety is an issue. Significant hazards were determined and documented in the HIRADC analysis. For Mill sighted HIRADC analysis for Workshop, Store, Shredding Loading Ramp/Hopper, Sterilizer, and Biogas Construction Plant & Boiler.</p> <p>Whereas for Estates sighted HIRADC for Loading, Transportation to Platform, fruit harvesting, spraying and land fill activities.</p> <p>Procedures and control measures were implemented to mitigate the risks. Annual audiometric tests for mill staff and workers for year 2015 is still in the progress and the management have planned to conduct the annual audiometric test on 20/12/15. The workers interviewed did not suffer from significant hearing disabilities. The employees exposed to high noise levels were interviewed. The workers are aware of the danger of hearing loss due to prolonged exposure to high noise levels. The workers are also aware of the complaints process and mechanism available. "Permit to work" system was applied at the POM for contractors.</p>	<p>Complied</p>

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<p>4.7.3</p> <p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p><u>Mill & Estates</u></p> <p>Training programme planned for year 2015 was consistently implemented. The programme includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to:</p> <ul style="list-style-type: none"> - workers exposed to machinery and high noise levels, - workers working on waste collection, - harvesters - pesticides operators - manurers <p>Training also provided on use of fire extinguishers and fire drill, awareness and understanding of MSDS/CSDS and first aid. Employees interviewed at POM confirmed to be provided with safety training relating to their work at least once a year by the qualified Safety & Health Officer and training records are available. Evaluation carried out on each training programme to determine its effectiveness. The training content was revised periodically for improvement. The safety and health training on exposure to noise levels conducted by the qualified Safety & Health Officer complied with the requirements of the Factories and Machinery (Noise Exposure) Regulations. All staff and mill employees attended the training as indicated in the records maintained. The content of the training include the said provisions of the regulations, purpose and explanation of audiometric test, proper usage of ear plugs and ear mufflers, and consequence of hearing loss. Appropriate PPE had been provided to all workers at the place of work to cover all potentially hazardous operations. There are warning signs to use PPE (this includes helmet, safety boots, ear plugs, ear mufflers, etc.) displayed at appropriate work areas for the protection of safety and health.</p>	<p>Complied</p>
<p>4.7.4</p> <p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.</p> <ul style="list-style-type: none"> - Major compliance - 	<p><u>Mill & Estates</u></p> <p>The responsible persons are the Mill Manager, Assistant Managers and the Head of the respective operating units. Records of regular meetings between the responsible person and workers to discuss about health and safety had been verified to be satisfactory.</p> <p>E.g. sighted POM S&H Meeting dated 8/11/15 & 18/8/15, Sungai Papan Estate dated 26/10/15 & 15/6/15 and REM Estate dated 19/11/15 & 25/6/15.</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance
4.7.5 Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. - Minor compliance -	<u>Mill & Estates</u> Accident and emergency procedures had been written and briefed to staff, workers, contractors and visitors. Workers trained in First Aid were present in the mill and field operations. Records on all accidents had been verified to be maintained satisfactorily. Quarterly review on accident cases had been carried out during quarterly meeting of Environment, Safety & Health (ESH).	Complied
4.7.6 All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -	<u>Mill</u> Medical care has been provided to all the workers. Local workers are covered by SOCSO, whereas foreign workers are covered by Foreign Workers Compensation Scheme Seen Serial No. Card W0012-7349 & Serial No. Card W0012-7355 (www.epampasan.net.my). <u>Sungai Papan Estate</u> Medical care has been provided to all the workers. Local workers are covered by SOCSO, whereas foreign workers are covered by Foreign Workers Compensation Scheme Seen Berjaya Sampo Insurance (Policy No.:15DJBWWCZ01001, valid until 29/12/2016). <u>REM Estate</u> Medical care has been provided to all the workers. Local workers are covered by SOCSO, whereas foreign workers are covered by Foreign Workers Compensation Scheme with RHB Insurance Bhd. Seen Policy Certificate No. FW176584.	Complied
4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	<u>Mill & Estates</u> Records on Lost Time Accident (LTA) metrics had been verified to be satisfactory. Sighted accident report dated 15/8/15 for mill worker, accident report dated 4/5/15 for Sungai Papan Estate worker and accident report dated 13/5/15 for REM Estate. Appropriate accident investigation reports & JKPP 6 letters been submitted accordingly. DOSH visits at the mill and estates been recorded in the DOSH log book and noted comments highlighted by DOSH has been taken action accordingly by the organization.	Complied
Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.		
4.8.1 A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. - Major compliance -	<u>Mill & Estates</u> Formal training program for the year 2015 available and implemented. Regular assessment of training conducted to ensure understanding among the employees. Trainings conducted include a formal training programme on all aspects of RSPO Principles and Criteria and the Supply Chain Certification System. The various trainings conducted and the training records maintained to be acceptable.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
4.8.2 Records of training for each employee shall be maintained. - Minor compliance -	Training records available. Some of the samples: <u>Mill:</u> 1. Schedule Waste Training dated 6/3/15 2. ERP & CPR Training dated 10/8/15 & 11/8/15 <u>Sungai Papan Estate:</u> 1. First Aid training dated 15/6/15 2. Fire Drill training dated 30/2/15 <u>REM Estate:</u> 1. Tractor Safe Driving Training dated 17/10/15 2. Chemical Handling training dated 13/1/15	Complied
Principle 5: Environmental responsibility and conservation of natural resources and biodiversity		
Criterion 5.1: Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.		
5.1.1 An environmental impact assessment (EIA) shall be documented. - Major compliance -	Environmental impact assessment documents and reviewed by Kulim Sustainability Team and representatives from each Sindora Mill and Estate on 1 November 2015 and at REM Pasak on 27/7 2015. Review of the Environmental Aspects and Impacts Register (Form No.: EPA-SINPOM-2014, LSP-EIA/2015 and EPA-REM PASAK-2015). This involved conducting a re-assessment for each of the significant risks and providing risk control. The Environmental Aspect Impact Assessment cover the following activities: <ul style="list-style-type: none"> • Building new roads, processing mills or other infrastructure; • Putting in drainage or irrigation systems; • Replanting areas; • Management of mill effluents; • Soil and water resources • Other activities in the mill and estates. • Air quality, greenhouse gases and ecosystems, and • Amenity Sindora Mill carried out the latest review of environmental impacts using the Environmental Risk Assessment Form EPA-SINPOM-2015 in 1/9/15. This involved conducting a re-assessment for each of the significant risks.	Complied
5.1.2 Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. - Minor compliance -	Identification of environmental impacts that requires changes in current practices, in order to mitigate negative effects is developed. The mitigation plans have timetable for change and developed and implemented within a comprehensive management plan. The management plan has identified with responsible person. The continuous implementation of the improvements activities were checked during the field and document audit. Examples of the improvement include reinstatement of riparian buffer zones, construction of oil traps, management of schedule waste etc. The responsible person is the Assistant Manager.	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
5.1.3	<p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p> <p>- Minor compliance -</p>	<p>Environmental improvement plan incorporated with monitoring of changes in the operations. It is implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring protocol, which is adaptive to operational changes and is reviewed annually to reflect the results of monitoring operational changes that may have positive and negative environmental impacts.</p> <p>An environmental improvement plan was implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring protocol, which is adaptive to operational changes and is reviewed every year to reflect the results of monitoring operational changes that may have positive and negative environmental impacts.</p>	Complied
<p>Criterion 5.2: The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and and operations managed to best ensure that they are maintained and/or enhanced.</p>			
5.2.1	<p>Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).</p> <p>- Major compliance -</p>	<p>Information in High Conservation Value (HCV) assessment includes both the planted area itself and relevant wider landscape-level with considerations of surrounding areas. Initial HCV assessment conducted in 2007 by external consultant is reviewed annually to ensure management and monitoring plans are relevant and conducted. This was carried out by the head office personnel with knowledge on HCV. Sindora Operating unit continue consultation with the Department Wildlife and National Park to discuss and seek assistant from the department on issues related to elephant sighting at the boundary of the Sindora Estate.</p>	Complied
5.2.2	<p>Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan.</p> <p>- Major compliance -</p>	<p>Similar to last assessment there were no RTE within the estate but endangered species such as elephant was sighted at the Sindora estate boundary adjacent to state forest. The Department of Wildlife and National Park continue to conduct regular visit to the site. The company through its Kulim Wildlife Defenders Program continues to support to detect illegal hunters and handing them to regulatory departments for further action.</p>	Complied
5.2.3	<p>There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species.</p> <p>- Minor compliance -</p>	<p>Operating units have programme to regularly educate the workforce about the status of these RTE species. Procedure is available to take appropriate disciplinary measures in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. There were no such cases noted during this assessment. There is evidence that the operating units continuously prevent and discourage illegal or hunting, fishing or collecting activities. Signages as well as routine patrolling activities were utilised as part of creating awareness among employees and maintain HCVs.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
5.2.4 Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance -	Management plan is incorporated with ongoing monitoring of the status of HCV and RTE species that are affected by plantation or mill operations and reported by the Kulim SPO Team from Head Office. Outcomes of monitoring are communicated with plantation management and with management plan. HCV monitoring of monthly record by SPO Department available and animal such as wild boar, king cobra and wild duct and monkey was still sighted. Elephant was not sighted by the team based on report in November 2015.	Complied
5.2.5 Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	There was no HCV set-aside that needs any negotiation process with the local communities.	Complied
Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.		
5.3.1 All waste products and sources of pollution shall be identified and documented. - Major compliance -	Documented identification of all wastes were reflected in the Waste and pollution Management Plan for the complex dated 5 October 2015. Visits made to Mill together with estates showed that all waste products and sources of pollution were identified and documented. The documentation and identification of all the waste products such as scheduled waste, domestic waste and recyclable waste such as metal, plastic, mill waste and polluting materials e.g. EFB, POME, Stack emissions and Boiler ashes were maintained and monitored at the Mill. Scheduled Waste identified included spent hydraulic oil (SW 305), spent lubricant oil (SW 306), used chemical containers/drums (SW 409), used filters SW 410) and used batteries (SW 102). Records on the usage and disposal were well recorded and documented. Appropriate secondary containment for the diesel skid tanks, chemical and scheduled waste storage areas was verified to be maintained.	Complied
5.3.2 All chemicals and their containers shall be disposed of responsibly. - Major compliance -	All chemical containers are disposed as per the company procedures. Most of the agrochemical containers are recycled for pre-mixing agrochemicals. Recycling is only for the same purpose.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>5.3.3</p> <p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.</p> <p>- Minor compliance -</p>	<p>Management and disposal of hazardous chemicals and their containers available in waste and pollution management plan. Surplus chemical containers are reused for premixing agrochemical. Balance is disposed of in an environmentally and socially responsible way after triple rinse by returned to collector G-Planter on 1/12/15. The disposal instructions on the manufacturers' labels are adhered to. No use off open fire for waste disposal. Scheduled waste is managed well with designated storage area at the mill and each of the estates not to less than 180 days in accordance with the requirements of the Environmental Quality Act 1974 (Scheduled Wastes), Regulations, 2005. Disposal was through licensed collector (No. 002086) Kualiti Alam Sdn Bhd.(Consignment note No.: 2015120516V71JXA) dated 24/6/2015 for SW305, SW306, SW307, and SW410 and Clinical Waste SW404 dated 7/10/2015 No. 0000475, sent to Kuala Lumpur.</p> <p><u>Mill & Estates</u></p> <p>Scheduled waste is managed well with designated storage area at the mill and each of the estates not to less than 180 days in accordance with the requirements of the Environmental Quality Act 1974 (Scheduled Wastes), Regulations, 2005. Disposal was through licensed collector. The company has continued managing scheduled waste stores at the mill and each of the estates. Agrochemical containers are triple rinsed and punctured to avoid any misuse. At mill, schedule waste is disposed through licensed collector OLST Petro-Chemical Sdn Bhd. Sighted Consignment note No.: 2015092918FRI1GJ dated 29/9/2015 for SW305. Whereas at REM Estate schedule waste is disposed through licensed collector Kualiti Alam Sdn Bhd. Sighted Consignment note No.: 0912633003 dated 24/8/2015 for SW307 – Oil mix water.</p>	<p>Complied</p>
<p>Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>		
<p>5.4.1</p> <p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored.</p> <p>- Minor compliance -</p>	<p>Mill has maximised renewable energy use. The mill production output records and the renewable energy used were monitored monthly. The Mill monitors and reports energy usage monthly to head office through monthly report. The energy usage varies depending on the FFB supplied by the estates. During low crop there is a slight increase in use of diesel fuel for processing. Monitoring of fuel used is based on per Mt of CPO. Average 11% of fiber used per month combining with 5% of shell as renewable energy source. Estates monitor the use of fossil fuel/mt FFB. Average is 0.8L/mt FFB.</p> <p>Sindora Palm Oil Mill is constructing biogas plant to collect and use biogas. It is expected to complete by end of 2016 if the test run and commissioning is successful.</p>	<p>Complied</p>
<p>Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.</p>		

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Criterion / Indicator	Assessment Findings	Compliance
5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -	Complied
5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -	Complied
Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.		
5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -	Complied
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	Complied
5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -	Complied
Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.		

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Criterion / Indicator		Assessment Findings	Compliance
Criterion 6.1: Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.			
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	Sindora operating unit social impact assessment was reviewed annually by taking into consideration the feedback from stakeholders and social action plan is developed based on feedback received from external and internal stakeholders. Record of meeting with attendance list and minute of meeting are available as attachment. Sustainability Department executives conduct annual survey to get feedback from stakeholders. Latest survey was conducted on 3/7/15. SIA action plan has been updated on 1/8/15.	Complied
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	Assessment also covered Social Amenities, Environment, Road Users, Employee Changes, Safety and Health Issues, Surrounding Communities, Government Official, Police, Labour Department, Health Department, Contractors and Suppliers.	Complied
6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -	Based on the SIA findings and recommendation from the sustainability executives, a timetable with responsibilities for mitigation and monitoring of the social impacts were developed and reviewed as necessary. The Assistant Manager is responsible for the social issues and communication with the stakeholders.	Complied
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	Annual SIA improvement plans reviewed yearly. The assessment was through meeting with the effected parties and stakeholders conducted by the Kulim Sustainability executives. Latest review was done on 1/8/2015.	Complied
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	No smallholder schemes at Sindora Certification Unit.	Complied
Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.			
6.2.1	Consultation and communication procedures shall be documented. - Major compliance -	Documented consultation and communication procedures "Grievance Procedure" SOP was established and available since 2008.	Complied
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	The responsibility to ensure effective implementation of the SOP is the respective Mill and Estate Managers assisted by assistant managers. These executives of the respective operating unit handle social issues of the mill and estates.	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -	Stakeholder list has been updated on the 1/10/2015 including all the stakeholders with the contact persons and detail which include government agency NGO, supplier, and contractor. Several internal and external stakeholders have been conducted separately with different stakeholder. Several internal and external stakeholders have been conducted separately with different stakeholder. i.e. Latest meeting at Sungai Papan Estate was on 25 November 2015. As for REM estate, last meeting was done on 19/2/2015.	Complied
Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.			
6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance -	A documented dispute resolution procedure is available in Mill and Estate which is effective, timely, and appropriate and open to any affected parties. The complaint and grievances is open to effected parties including internal and external stakeholders.	Complied
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance -	SOP to resolve social disputes "Grievance Procedures" SOP dated since 2008 has been established. Stakeholder meetings are held regularly to identify and give opportunity to stakeholders to complaint or raise disputes. Issues are discussed and consensual agreements reached during stakeholder meetings. Follow-up actions had timelines, responsibilities, and details of actions and monitored by managers for satisfactory conclusion. Minutes of meetings are maintained and reviewed.	Complied
Criterion 6.4: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	SOP to identify legal and customary rights as well as people entitled to compensation has been established. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. - Minor compliance -	SOP is as per in 6.3.2 above.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders to date. Complied
Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.		
6.5.1	Documentation of pay and conditions shall be available. - Major compliance -	Documentation of pay and conditions such as pay slips shows gross pay, net pay, leave, medical leave pay etc are maintained by the company. Minimum wage is paid to workers and no complaint was received during interview with workers. Complied
6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. - Major compliance -	Employment contract are available and understood by workers. This was confirmed during the workers interview. Pay and conditions explained to workers by the operating units. Basic daily pay was verified to be in accordance with the minimum wage payment. Sample contract and payslip of employees (Passport No.: AS 042957, AR 894911, AS 031718) for the month of October 2015 verified during the audit and found paid more than the minimum wage. Complied
6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. - Minor compliance -	Palm Oil Mill and estates provide adequate housing, water supplies, medical, educational and welfare amenities in accordance with Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446). The Mill has completed the new housing project for workers. Water is supplied to workers housing through piping. The water tanks are provided for storage purpose. Complied
6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	Accesses to food for the workers are considered adequate and sufficiently. Complied
Criterion 6.6: The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.		
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	Workers have freedom to join the workers union. Policy on Freedom of Association dated since 2008. Complied

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Criterion / Indicator		Assessment Findings	Compliance
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	Worker Union (NUPW) was formed by the workers. Union meeting has been conducted on the 2/3/2015 and no major issue has been highlighted. Interview with NUPW state secretary and local representatives confirmed that there were no pending issues. <u>Sungai Papan estate:</u> Latest meeting was done on 19/11/2015 attended by 10 workers. <u>REM estate:</u> Latest meeting was done on 13/2/2015 attended by 8 workers.	Complied
Criterion 6.7: Children are not employed or exploited.			
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	Operating units are complied with the minimum age requirement. No employees below the age of 18.	Complied
Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	A policy on equal opportunity available and displayed at the offices along with the other policies.	Complied
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	Migrant workers are recruited with 3 years contract. Local workers are on a long term employment. No any kind of discrimination was noted. Job opportunities and amenities such as free housing, water and electricity supplies, medical care are given to all employees without discrimination. All employees are aware of the grievance procedures through the various Committees such as Gender Committee for women, foreign workers representation and union committee to highlight their concerns and grievances if any. No grievances were highlighted to the audit team by internal and external stakeholders.	Complied
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	Recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. It was noted during the audit that there is no discrimination based on nationality, race, gender, age, etc.	Complied
Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.			
6.9.1	Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	Policy on protection against Sexual Harassment and other forms of harassment available and implemented. There is no any reported case of harassment in the operating units. Gender committee namely "WOW" (Women Onwards) has been established in all operating units and guided by Sustainability Department from HQ.	Complied

Criterion / Indicator	Assessment Findings	Compliance
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	Reproductive rights of the female workers are protected. Female employees are aware that they are entitled for two months paid maternity leave. Sungai Papan and REM estates conducted the last complex level meeting on 14/9/2015 attended by 15 female workers and staffs. Complied
6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance -	Existing grievance procedure to handle grievances from internal and external stakeholders contains flow chart and available in the local language. Grievances and complaints are treated as confidential and not discussed in public. Complied
Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.		
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	Pricing mechanism for FFB is based on Malaysian Palm Oil Board pricing published in the MPOB website and publicly available. Complied
6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). - Major compliance -	The palm oil mill management have explained FFB pricing, and pricing mechanisms for FFB and inputs/services and documented. The FFB suppliers interviewed understand the pricing calculation methods. Complied
6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -	Contractors/suppliers understand contractual agreement and stated that the contract is transparent and fair. The company has standard term and condition of contract agreement which is explained prior to signing. Sample agreement of grocery shop owner dated 1/1/2015 was verified. Complied
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	Interview of contractors and workers confirmed payment is made promptly. Inspection to the "Grievance Book" indicated no complaint was raised in relation to processing of the payment. Complied
Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.		
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance -	Contributions are regularly made to school activities and community activities. This was confirmed by local community head and school headmistress during interview. Company also allow access to local community to access through the estate roads. Consultations with the local communities are held to encourage them to highlight and suggest any activities for local community development Complied
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance -	No scheme smallholders. Complied
Criterion 6.12: No forms of forced or trafficked labour are used.		

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Criterion / Indicator		Assessment Findings	Compliance
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	All employees are legal with local identification card for local employees and foreign employees are with valid passports and working permits. No evident of trafficked workers were found during the audit.	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance -	No contract substitution was noted.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	Equal opportunity and non-discriminatory policy is implemented. No temporary workers. Migrant workers are treated equally as per the locals.	Complied
Criterion 6.13: Growers and millers respect human rights.			
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	The existing policy covers the necessary aspects of human rights. Employees are aware of their rights and workers and staff union monitor to ensure no violations.	Complied
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	Not applicable for Peninsular Malaysia.	Complied
Principle 7: Responsible development of new plantings Sindora Palm Oil Mill Certification unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this surveillance assessment.			
Principle 8: Commitment to continual improvement in key areas of activity			
Criterion 8.1: Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.			

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Criterion / Indicator	Assessment Findings	Compliance
<p>8.1.1</p> <p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); <ul style="list-style-type: none"> • Optimising the yield of the supply base. <p>- Major compliance -</p>	<p>Kulim has stopped the use of paraquat since March 2015. Environmental impacts of the operations were identified and reviewed periodically. Environmental Impact Management details the impact mitigation measures and actions required to improve environmental performance for the identified significant impacts. FFB yield is optimised. Sindora Mill is in the process of constructing Biogas plant to capture methane from POME. Kulim estates are in the midst of re-survey the HCV area and enhance the biodiversity area such as Bird sanctuary.</p>	<p>Complied</p>

Appendix B: Kulim (Malaysia) Berhad Time Bound Plan

TIME BOUND PLAN – Certification Units in Malaysia			
No.	MANAGEMENT UNIT		
	Malaysia	Time Bound for certification	Status
1	Sedenak Palm Oil Mill	2009	Certified 2009. Recertification completed in 2014
2	Sindora Palm Oil Mill	2009	Certified 2009. Recertification completed in 2014
3	Tereh Palm Oil Mill	2009	Certified 2009. Recertification completed in 2014
4	Palong Palm Oil Mill	2009	Certified 2009. Recertification completed in 2014
5	Pasir Panjang Palm Oil Mill (Previously certified through JCorp. But terminated due to the mill was leased to third party and Kulim (Malaysia) Berhad did not have the management control. Now the management control is under Kulim (Malaysia) Berhad after fully acquiring the Palm Oil Mill in 2015)	2016	Planning in 2016.
Indonesia			
6	PT Harapan Barito Sejahtera	NPP completed	Planting in progress.
7	PT Sawit Sumber Rejo	NPP completed	Planting in progress
8	PT Wahana Semesta Karisma	NPP completed	Planting in progress

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Appendix C: Kulim (Malaysia) Berhad – Sindora Certification Unit RSPO Certificate Details

Kulim (Malaysia) Berhad
 Sindora Palm Oil Mill,
 KB 501,
 86009 Kluang, Johor,
 MALAYSIA

BSI RSPO Certificate No: SPO 612392

Date of Initial Certificate Issued: 23 January 2009

Date of Expiry: 22 January 2019

RSPO membership number: 1-0006-04-000-00

Applicable Standards: RSPO P&C 2013; RSPO Certification System June 2007 (revised March 2011); Annex 4: Procedures for Annual Surveillance; RSPO P&C MY-NIWG 2014; RSPO Supply Chain Certification Standard November 2014 Module E - CPO Mills: Mass Balance

Sindora Palm Oil Mill and Supply Base					
Location Address		Sindora Palm Oil Mill, KB 501, 86009 Kluang, Johor, Malaysia.			
GPS Location		Longitude: 103° 27' 44.31" E Latitude: 1° 59' 7.33" N			
CPO Tonnage Total		28,391			
PK Tonnage Total		7,886			
CPO Claimed for Certification		28,391			
PK Claimed for Certification		7,886			
Own estates FFB Tonnage		137,155			
Scheme Smallholder FFB Tonnage		-			
Company's adjacent Suppliers FFB Tonnage – Other adjacent estates (Certified)		-			
Estates	Production Area		Other use (ha)	Certified Area / Total land lease (ha)	Annual FFB Production (mt)
	Mature (ha)	Immature (ha)			
Sindora Estate	2,030.41	1,368.02	520.68	3,919.11	41,419
Sungai Papan Estate	2,273.53	559.77	188.67	3,021.97	47,396
REM Estate	1,621.22	524.19	431.35	2,576.76	39,967
Rengam estate*	-	-	-	-	8,373
TOTAL	5,925.16	2,451.98	1140.70	9,517.84	137,155

*Note: Certified FFB estimated to be received by Sindora Palm Oil Mill from Group Estate. The Group Estate is certified under Sedenak Supply Base.

Appendix D: Assessment Plan

PRELIMINARY AGENDA					
Date	Time	Subjects	Senniah	Muhd Haris	Ragu
Sunday 6/12/2015	PM	Audit team travelling to Kluang	√	√	√
Monday 7/12/2015 Sindora Palm Oil Mill	08.30 – 09.00	Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation). 	√	√	√
	09.00 – 12.00	Sindora Palm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	√	√	√
	09.00 – 12.00	Meeting with stakeholders (Government, village rep, smallholders, Workers Leader, contractor etc.)	-	√	-
	12.00 – 13.00	Lunch	√	√	√
	13.00 – 16.30	Sindora Palm Oil Mill : Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: 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 etc. Verify previous nonconformities.	√	√	√
	16.30-17.00	Interim Closing briefing.	√	√	√
Tuesday 8/12/2015	08.30 – 12.00	Sungai Papan Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√
	12.00 – 13.00	Lunch	√	√	√
	13.00 – 16.30	Sungai Papan Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	16.30-17.00	Interim Closing Briefing	√	√	√
Wednesday 9/12/2015	8.30 – 12.00	REM Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√
	12.00 – 13.00	Lunch	√	√	√

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PRELIMINARY AGENDA					
Date	Time	Subjects	Senniah	Muhd Haris	Ragu
	13.00 – 15.30	REM Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	15.30-16.30	Verify any outstanding issues and preparation for Closing Meeting	√	√	√
	16.30-17.30	Closing Meeting	√	√	√
Thursday 10/12/2015	AM	Audit team travelling back to KL.	√	√	√

Appendix E: Stakeholders Contacted

<p>Internal Stakeholders</p> <p>Managers and Assistants Male Mill Staff/Workers Female Mill Staff/Workers Foreign Worker Field workers Nursery workers Male and Female Estate workers Hospital Assistant Union Representatives Gender Committee Secretary Boiler operators Engine room operators Store clerk Staff and Welder at workshop Press station worker Weighbridge Staff</p>	<p>External Stakeholders</p> <p>Head of the Village Neighboring Estate Mosque Committee Contractors & Consultants Electrical Contractor General Supplier</p>
<p>Government Departments</p> <p>Labour Department Department of Safety and Health (DOSH) Department of Wildlife and National Park (Johor)</p>	<p>Non Governmental Organization</p> <p>National Union of Plantation Workers All Malaysia Estate Staff Union GreenPalm</p>

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Appendix F: Sindora Palm Oil Mill Supply Chain Assessment (Module E – CPO Mills: Mass Balance)

Requirements	Compliance
E.1 Definition	
<p>E.1.1 Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>The Sindora Palm Oil Mill receives and process certified and non- certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the annual assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and sales volume of RSPO certified palm products through RSPO IT System.</p>
E.2 Explanation	
<p>E.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced should then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. Actual production recorded in Section 1 of the public summary report..</p>
<p>E.2.2 The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>	<p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>
E.3 Documented procedures	
<p>E.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</p> <p>b) The name 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 site procedures for the implementation of this standard.</p>	<p>Latest written documented procedures (No. SM/WI/2 Revised on 2/08/15) for the chain of custody is with Mass Balance (MB) model covering all the RSPO Supply Chain Certification Standard and Traceability for handling certified and noncertified FFB. This developed based on the RSPO SCCS 21 November 2014. The mill manager has the responsibility to ensure implementation assisted by the on-site compliance executive. The MB model is used because certified and non-certified FFB is received and processed at Sindora Palm Oil Mill.</p> <p>The mill manager and assistant manager have awareness of the supply chain system. The manager has overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements.</p>
<p>E.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	<p>Sindora Palm Oil Mill has documented procedures for the incoming FFB, processing and outgoing palm products (CPO and PK). System available to make marking on the receiving documents to differentiate the certified and non-certified FFB received</p>
E.4 Purchasing and goods in	
<p>E.4.1 The site shall verify and document the volumes of certified and non-certified FFBs received.</p>	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and non-certified FFB. Records verified by internal and external audit. i.e.: FFB received from Sg. Papan Estate: Weighbridge Ticket No. 84555, dated: 31/10/15, Transport No. JJE 5729 and weight: 25.42mt certified.</p>

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E.4.2 The site shall inform the CB immediately if there is a projected overproduction.	The facilities aware of this procedure.
E.5 Record keeping	
E.5.1 a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis. (b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)	Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and non-certified FFB. Computerized system in place. Records verified by internal and external audit. Computerized system in place with the delivery deducted accordingly. The Mill aware that only positive stock can be delivered. No short selling.
E.5.2 In cases where a mill outsources activities to an independent palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement	No outsourcing activities.

Actual Certified Palm Production – Nov. 2014 – Oct. 2015 (ASA1)

MILL	CAPACITY	CPO	PK
Sindora Palm Oil Mill	40 mt/hr	30,833.91	8,745.29

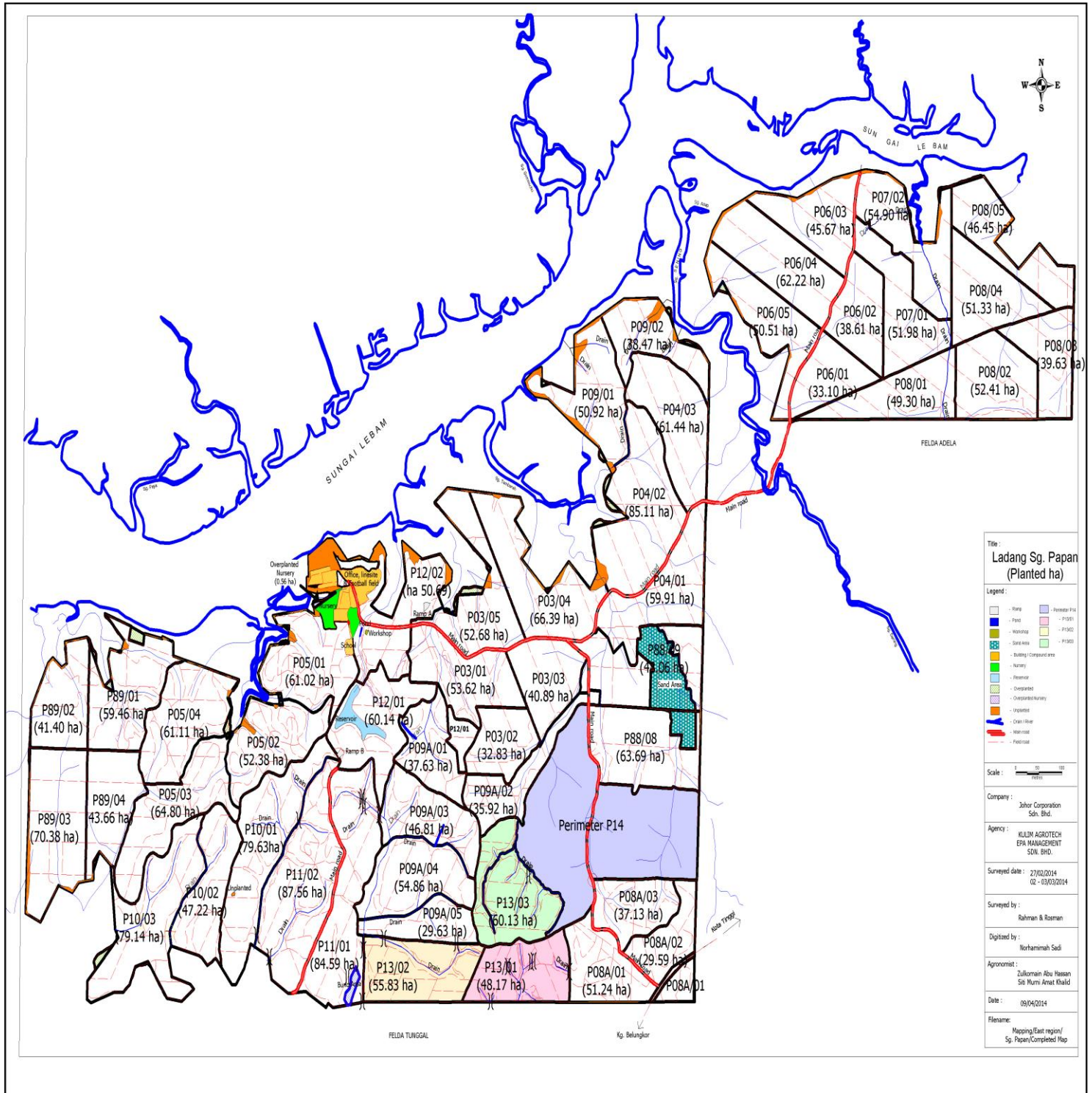
Actual Sales of Certified Palm Products – Nov. 2014 – Oct. 2015 (ASA1)

MILL	Certified CPO Sales	Certified PK Sales	Remarks
Sindora Palm Oil Mill	2,171.41mt (Confirmed sales through eTrace)	NIL	Sales of certified palm products in eTrace

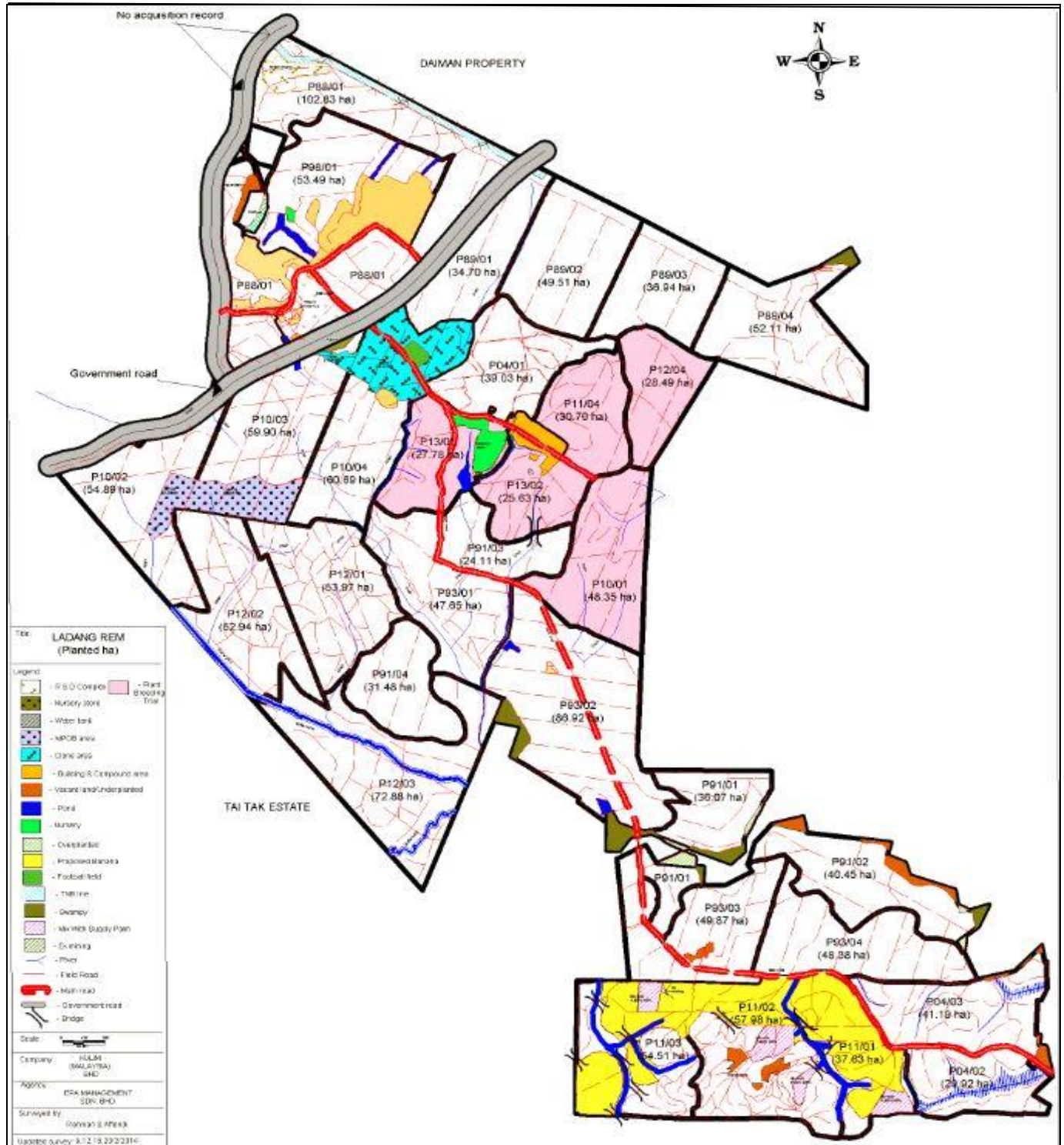
Actual Certified FFB Received Monthly – Nov. 2014 – Oct. 2015 (ASA1)

Month	Sindora Estate	REM Estate	REM Pasak Division	Sg. Papan Estate	Rengam Estate	Ulu Tiram Estate	Basir Ismail Estate	Kuala Kabong Estate	Total FFB/Month
Nov. 2014	4,427.60	1,793.75	1,693.79	3,820.48	0	0	0	0	11,735.62
Dec. 2014	4,007.38	1,927.46	1,817.34	4,189.35	0	0	0	0	11,941.53
January 2015	3,131.68	1,475.33	1,239.93	2,774.78	0	0	0	0	8,621.72
February 2015	3,498.75	1,290.84	1,171.79	2,331.11	0	0	0	0	8,292.49
March 2015	4,060.39	1,929.28	1,554.02	4,038.91	0	0	0	0	11,582.60
April 2015	4,380.10	2,048.04	1,592.16	5,240.29	0	0	0	0	13,260.59
May 2015	4,151.78	2,165.71	1,621.78	5,385.34	0	0	0	0	13,324.61
June 2015	3,972.58	2,127.03	1,530.50	5,755.76	0	0	0	0	13,385.87
July 2015	3,939.18	2,021.62	1,513.94	6,601.55	0	0	0	0	14,076.29
August 2015	3,803.51	2,197.40	1,389.20	6,119.16	4,997.00	27.82	354.66	108.72	18,997.47
Sept. 2015	3,781.62	2,126.75	1,465.52	5,477.11	0	0	0	0	12,851.00
Oct. 2015	3,902.46	1,925.56	1,368.20	4,996.70	0	0	0	0	12,192.92
Total	47,057.03	23,028.77	17,958.17	56,730.54	4,997.00	27.82	354.66	108.72	150,262.71

Appendix G: Map shows location of the Sungai Papan Estate



Appendix H: Map shows location of the REM Estate



Appendix I: List of Abbreviations Used

ASA	Annual Surveillance Assessment
BOD	Biological Oxygen Demand
CHRA	Chemical Health Risk Assessment
CPO	Crude Palm Oil
DOE	Department of Environment
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
GMP	Good Manufacturing Practice
HCV	High Conservation Value
IAV	Initial Assessment Visit
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
MAPA	Malaysian Agriculture Producers Association
MPOA	Malaysian Palm Oil Association
MSDS	Material Safety Data Sheet
MSPO	Malaysian Sustainable Palm Oil
MY-NI	Malaysian National Interpretation
NUPW	National Union of Plantation Workers
PK	Palm Kernel
PPE	Personal Protective Equipment
RED	Renewable Energy Directive
RSPO P&C	Roundtable on Sustainable Palm Oil Principle & Criteria
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure