

# MALAYSIAN SUSTAINABLE PALM OIL - INITIAL ASSESSMENT Public Summary Report

#### **BOUSTEAD PLANTATIONS BERHAD**

Head Office:

19th Floor Menara Boustead, 69, Jalan Raja Chulan, 50200 Kuala Lumpur, Malaysia

**Certification Unit:** 

Telok Sengat Business Unit

Telok Sengat Palm Oil Mill and Plantations (Telok Sengat Estate, Chamek Estate and Kulai Young Estate)

Location of Certification Unit: P.O. Box 513, 81909 Kota Tinggi, Johor

Report prepared by:
Mohd Hafiz Bin Mat Hussain (Lead Auditor)

Report Number: 9674424

#### **Assessment Conducted by:**

BSI Services Malaysia Sdn Bhd, Unit 3, Level 10, Tower A The Vertical Business Suites, Bangsar South No. 8, Jalan Kerinchi 59200 Kuala Lumpur Tel +603 2242 4211 Fax +603 2242 4218 www.bsigroup.com



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#### **Section 1: Executive Summary**

1.1 Organizational Infor	1.1 Organizational Information and Contact Person				
MPOB License	Telok Sengat POM: 500089304000				
	Telok Sengat Estate: 615231002000				
	Chamek Estate: 613906002000				
	Kulai Young Estate: 61605002000				
Company Name	Boustead Plantations Berhad				
Address	Head Office: 19th Floor Menara Boust	ead, 69, Jal	an Raja Chulan, 50200 Kuala		
	Lumpur, Malaysia				
	Certification unit: Telok Sengat POM, P.O. Box 513, 81909 Kota Tinggi, Johor				
Group name if applicable:	N/A				
Subsidiary of (if applicable)	N/A				
Contact Person Name	Anuar Bin Semail / Nurul Hanani Binti	Abdullah			
Website	www.bousteadplantations.com.my E-mail anuar.bea@boustead.com.my				
			hanani.bea@boustead.com.my		
Telephone	+603-2145 2121 Ext. 351	Facsimile	+603-2144 7917		

1.2 Certification	Information					
Certificate Number	Mill: MSPO 697045	1ill: MSPO 697045				
	Estate: MSPO 6970	47				
Issue Date	15/04/2019	E	Expiry date	14/04/2024		
Scope of Certification	Mill: Production of S	Sustainable Palm	Oil and Palm Oil	Products		
	Estate: Production of	of Sustainable Oi	l Palm Fruits			
Stage 1 Date		26-30/08/2018				
Stage 2 / Initial Asse	ssment Visit Date (IAV)	19-22/11/2018				
Continuous Assessme	ent Visit Date (CAV) 1	N/A				
Continuous Assessme	ent Visit Date (CAV) 2	N/A				
Continuous Assessme	ent Visit Date (CAV) 3	N/A				
Continuous Assessme	ent Visit Date (CAV) 4	N/A				
Other Certification	ons					
Certificate	Standard(	(s)	Certificate 1	Issued by	Expiry Date	
Number						
N/A						



1.3 Location of Certification Unit							
Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference o Longitude	f the site office Latitude				
Telok Sengat POM	P.O. Box 513, 81909 Kota Tinggi, Johor	104° 02' 37.5" E	1° 34' 04.5" N				
Telok Sengat Estate	P.O. Box 513, 81909 Kota Tinggi, Johor	104° 02′ 13.80″ E	1° 34′ 03.60″ N				
Chamek Estate	P.O Box No. 505, 86009 Kluang, Johor	103° 14' 59.95" E	2° 08' 58.8" N				
Kulai Young Estate	P.O BOX 106, 81000 Kulai, Johor	103° 31' 48.50" E	1° 37' 31.50" N				

1.4 Plantings & Cycle							
Fatata			Age (Years) - I	na			
Estate	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Telok Sengat Estate	353.70	897.50	1579.30	570.30	102.60		
Chamek Estate	98.80	60.80	476.90	159.10	-		
Kulai Young Estate	421.60	36.30	-	199.60	-		
Total	874.10	994.60	2056.20	929.00	102.60		

1.5 FFB Production (Actual) and Projected (tonnage)						
Producer Group	Estimated	Actual	Forecast (Jan 19 – Dec 19)			
Telok Sengat Estate	N/A	N/A	72,000			
Chamek Estate			14,500			
Kulai Young Estate			10,800			
TOTAL			97,300			

1.6 Certified CPO / PK Tonnage					
Mill	Estimated	Actual	Forecast (Jan 19 – Dec 19)		
	CPO (OER: %)	CPO (OER: %)	CPO (OER: 25.64%)		
Telok Sengat POM	N/A	N/A	24,953		
40 MT/hr	PK (KER: %)	PK (KER: %)	PK (KER: 5.61%)		
			5,467		



1.7 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Telok Sengat Estate	3503.40	60.70	115.90	3680.00	95
Chamek Estate	795.60	0	21.30	816.90	97
Kulai Young Estate	657.50	0	13.00	670.50	98
Total	4956.50	60.7	150.20	5167.40	96

#### 1.8 **Details of Certification Assessment Scope and Certification Recommendation:**

BSI Services Malaysia Sdn Bhd has conducted the Initial Certification Assessment of Telok Sengat Palm Oil Mill, located in Kota Tinggi, Johor, Malaysia comprising 3 estates (Telok Sengat Estate, Chamek Estate and Kulai Young Estate) and infrastructure.

The assessment was conducted onsite to assess the compliance of the certification unit against the MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder, MS 2530-4:2013 Part 4: General principles for palm oil mills and MSPO Guidance.

The onsite assessment was conducted on  $19 - \frac{22}{11}/2018$ .

Based on the assessment result, Telok Sengat Palm Oil Mill and supply base (Telok Sengat Estate, Chamek Estate and Kulai Young Estate) complies with the MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder, MS 2530-4:2013 Part 4: General principles for palm oil mills and MSPO Guidance and recommended for certification.



#### **Section 2: Assessment Process**

#### **Certification Body:**

BSI Services Malaysia Sdn Bhd
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
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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.

#### **Assessment Methodology, Programme, Site Visits**

This on-site assessment was conducted from 19 - 22/11/2018. The audit programme is included as Appendix A. The approach to the audit was to treat the Telok Sengat Palm Oil Mill and Supply Bases as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities. Prior to audit conducted, public consultation was made accordingly; refer https://www.bsigroup.com/en-MY/RSPO-MSPO-Certification/MSPO-clients-and-reports1/

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. MS 2530-3:2013 and MS 2530-4:2013 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The estates or smallholders sample were determined based on formula  $S = r\sqrt{n}$  where n is the number of estates while when applicable, the smallholders sample were determined following the MSPO Certification Requirement. The sampling of smallholders were based on the formula  $(r\sqrt{n})$ ; where r is the risk factor (may defers 1, 1.5 and 2 depending on risk), where n is total number of group members. The sampled smallholder listed in Appendix C.

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

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

The assessment findings for the initial assessment are detailed in Section 4.2.

This report is structured to provide a summary of assessment finding as attached in the Section 3. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

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This report was externally reviewed by MSPO approved Peer Reviewer prior to certification decision by BSI.

## 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 / Plantation / Group smallholders)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Telok Sengat POM	√	$\checkmark$	√	√	√
Telok Sengat Estate	√		√	√	
Chamek Estate	√	√		√	√
Kulai Young Estate		√	√		√
Stakeholder Consultation	√				

**Tentative Date of Next Visit: November 5, 2019 - November 7, 2019** 

**Total No. of Mandays: 7 mandays** 



#### **BSI Assessment Team:**

#### **Mohd Hafiz Mat Hussain - Lead Auditor**

He holds Bachelor Degree in Plantation Technology and Management, graduated from University Technology Mara (UiTM) on 2009. He has 4 years working experience in oil palm plantation industry. He also has the experiences as an auditor for several standards including ISO 9001, ISO 14001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2014, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2016. He had been involved in RSPO auditing since May 2013 within Malaysia, Papua New Guinea, Solomon Islands, Gabon and Liberia. During this assessment, he assessed on the aspects of land and legal issues, workers welfare, stakeholder consultation, social, long-term economic viability environment and ecological, etc. He is fluent in Bahasa Malaysia and English languages.

#### **Hu Ning Shing – Team Member**

She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in her previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she assessed on the aspects of social. She is fluent in Bahasa Malaysia and English languages.

**Accompanying Persons: Nil** 



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

#### 3.1 Details of audit results

This assessment has be assessed using the following MSPO normative requirements. The assessment details are provided in Appendix A.

- ☐ MSPO MS 2530-2:2013 General Principles for Independent Smallholders

#### 3.2 Details of Nonconformities and Opportunity for improvement

The nonconformity is listed below.

During the Certification Assessment there were ten (10) major, two (2) minor nonconformities and two (2) opportunity for improvement raised. The Telok Sengat Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Major Nonconformity(ies) has been verified for it effectiveness and closed accordingly.

	Major Nonconformities:					
Ref	Area/Process	Clause				
1711670-201811-M1	Telok Sengat POM	4.4.4.1 (Part 4)				
Requirements:	An occupational safety and health policy and plan Safety and Health Act 1994 and Factories and N be documented, effectively communicated and in	lachinery Act 1967 (Act 139) shall				
Statement of Nonconformity:	There was no monitoring by employer to condintervals, each interval being no longer than a m					
Objective Evidence: Monthly inspection for LEV at Telok Sengat POM was not done as per Local exhaust ventilation report which was done on 26/7/2018 by Hygiene Tech II (PAC Testilation Sensitive Science) & Consulting Sdn Bhd)						
Corrections:	Mill need to ensure LEV inspection will be condu	cted on monthly basis.				
Root cause analysis:	No checklist form for LEV monthly inspection est	ablished.				
Corrective Actions:	Mill will be established the checklist form and ins	spection of LEV				
Assessment Conclusion:  All the evidence sighted found adequate and effectively implemented. The checklist for LEV monthly inspection was established. The record of inspection done on Dec 18 using the checklist form was sighted. Hence, the Major NC was closed.						



Major Nonconformities:						
Ref	Area/Process	Clause				
1711670-201811-M2	Telok Sengat POM and Plantations (Telok Sengat Estate, Chamek Estate, Kulai Young Estate)	4.5.3.3 (Part 3 and Part 4)				
Requirements:	The palm oil mill management shall establish handling of used chemicals that are classif Regulations (Scheduled Waste) 2005, Environm proper and safe handling, storage and disposal. as per Environmental Quality Act 1974 (Schedul	nental Quality Act, 1974 to ensure Scheduled waste shall be disposed				
Statement of Nonconformity:	The handling on scheduled waste was not imple	mented effectively.				
Objective Evidence:	Telok Sengat POM  1. The inventory and labelling for SW409 was not updated and implemented effectively.					
	Chamek Estate (Scheduled Waste Store)  1. The scheduled waste was not properly labelling especially for SW305					
Corrections:	Mill and estate need to ensure all schedule waste inventory and labeling was updated.					
Root cause analysis:	No monitoring by the management					
Corrective Actions:	The inventory and labelling will be monitored by person	person in-charge/competent				
Assessment Conclusion:	The inventory and labelling was updated an TSPOM. Sighted the record of inventory and	•				
	2. The appointment letter for person in-charge	e at TSE, KYE was sighted.				
	3. The appointment letter for person in-charge	e at TSPOM was sighted				
4. The labelling for scheduled waste at Chamek Estate was done according Sighted the photo for labelling at scheduled waste store.						
	All the evidence sighted found adequate and effectively implemented. Hence, the Major NC was closed.					



Major Nonconformities:					
Ref	Area/Process	Clause			
1711670-201811-M3	Plantations (Telok Sengat Estate, Chamek Estate, Kulai Young Estate)	4.4.4.2 (Part 3)			
Requirements:	The occupational safety and health plan shall co d) The management shall provide the appropriat cover all potentially hazardous operations as ide control such as Hazard Identification, Risk Asses i) A First Aid Kit equipped with approved content worksite.	te PPE at the place of work to ntified in the risk assessment and sment and Risk Control (HIRARC).			
Statement of Nonconformity:	The PPE implementation was not adequately wo	rn			
Objective Evidence:	Chamek Estate  1. Harvesting - the harvester was not wear PPE  2. No first aid kit available during site visit to har	. , , , , ,			
	Teluk Sengat Estate 1. The PPE for worker working at height was not	t adequately implemented			
Corrections:	Chamek Estate:  1. To conduct regular PPE training and to give of the safety awareness.	more information and education			
	2. To improve first-aid box to sling bag (easier to carry).				
	Telok Sengat estate:  To monitor and checking during working at heig	ht			
Root cause analysis:	Chamek Estate:				
,	Some of harvester omit and unwilling to wear PPE (attitude).				
	2. First-Kit is available but Mandore is on leave during audit/assessment. Furthermore, the first-aid box is too bulky to bring to field or work place.				
	Telok Sengat Estate				
	No awareness by the contractor during work at I	height			
Corrective Actions:	Chamek Estate: Conduct meeting with workers to:				
	1. Brief awareness and long term effects that failure to wear PPE could have on their health (as per picture attached).				
	2. Briefing and handing over sling bags to resp	ective persons.			
Telok Sengat Estate:					
	Conduct training SWP working at height				
Assessment Conclusion:	The PPE monitoring was done on 3/12/2018 implementation of PPE during harvesting act	,			



2.	Record of PPE replacement was sighted for Chamek Estate.
3.	Briefing/Training for first aid box and PPE was done on 3/12/2018.
4.	SWP training at TSE was done on 4/12/18. The records were sighted.
	the evidence sighted found adequate and effectively implemented. Thus, Major was closed.

Major Nonconformities:		
Ref	Area/Process	Clause
1711670-201811-M4	Plantations (Telok Sengat Estate, Chamek Estate, Kulai Young Estate)	4.5.3.4 (Part 3)
Requirements:	Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.	
Statement of Nonconformity:	The records for recycle empty container was not	t available.
Objective Evidence:	Telok Sengat Estate 1. No record of empty container that sent for recycle to G-Planters.	
Corrections:	To hire contractor from list DOP to collect and disposed as per Schedule Waste Act 672. Disposal was done on 4 <sup>th</sup> Dec 2018. Refer ESWISS.	
Root cause analysis:	There was no monitoring of disposal of empty container established.	
Corrective Actions:	Appointed person in-charge to monitor disposal of empty container	
Assessment Conclusion:	<ol> <li>The appointment letter for person in-charge at TSE, KYE was sighted.</li> <li>Sighted the letter from DOA</li> <li>Sighted the letter from DOE</li> </ol>	
	4. The disposal of empty container was done a the UPPCR Collection form by G-Planter and	
	All the evidence sighted found adequate and eff NC was closed.	ectively implemented. Thus, Major



Major Nonconformities:		
Ref	Area/Process	Clause
1711670-201811-M5	Plantations (Telok Sengat Estate, Chamek Estate, Kulai Young Estate)	4.5.6.1 (Part 3)
Requirements:	Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:  a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. b) Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities	
Statement of Nonconformity:	The report for HCV assessment was not available.	
Objective Evidence:	The HCV assessment was done by the Malaysia Environmental Consultant on 2-10/4/2018, however the report yet to be received by the management.	
Corrections:	To follow-up with Sustainability Dept.	
Root cause analysis:	HCV assessment is yet to be received from MEC	
Corrective Actions:	Management plan will be done and implemented once HCV report obtained.	
Assessment Conclusion:	The communication between Telok Sengat BU as sighted. The evidence sighted found adequate a Hence, the Major NC was closed.	



Major Nonconformities:		
Ref	Area/Process	Clause
1711670-201811-M6	Plantations (Telok Sengat Estate, Chamek Estate, Kulai Young Estate)	4.4.2.5 (Part 3)
Requirements:	Complaints and resolutions for the last 24 mont available to affected stakeholders upon request.	
Statement of Nonconformity:	Records to show that the complaint has been re Sengat Estate.	solved were not available in Telok
Objective Evidence:	Telok Sengat Estate	
	No evidence was sighted for the complaints that have been resolved on September 2018 by verified the Complaint Record and no acknowledgement by the complainant after the complains have resolved.	
Corrections:	To prepared log book and to improved complaint form with insert signature of informer.	
Root cause analysis:	No monitoring by the management on the records of complaint	
Corrective Actions:	To monitor and checking and included in OSHA meeting.	
	To monitor log book by the management	
Assessment Conclusion:	The management has established new complaint form to include acknowledgement by the complainant after the complaints have resolved.	
	OSHA meeting minute was sighted. The disc Sengat Estate was done during OSHA meeting.	·
	The evidence sighted found adequate and effectively implemented. Hence, the Major NC was closed.	



Major Nonconformities:			
Ref	Area/Process	Clause	
1711670-201811-M7	Plantations (Telok Sengat Estate, Chamek Estate, Kulai Young Estate)	4.4.5.6 (Part 3)	
Requirements:		All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records	
Statement of Nonconformity:	Terms and conditions that stated in employm contractors' workers were not according to the E		
Objective Evidence:	Employment contracts for contractor workers were signed. However, the terms stated in the contract was not according to Employment Act 1955 as below:  a. Workers who worked more than 5 years and above only will be entitled with 60 days of sick leave per year if admitted to hospital which indicates those who has work less than 5 years is not entitled with the hospitalization leave in Telok Sengat Estate and Chamek Estate.  b. For daily rated contractor's workers, the minimum rate of overtime per hour was RM 6.50 as stated in the contract. However, for daily rated RM 38.46, minimum rate of overtime per hour should be RM 7.20 found in Telok Sengat Estate.		
Corrections:	Corrections have been made and workers have lamended agreement.	peen called to brief and sign the	
Root cause analysis:	No person incharge monitor the terms and conditions in employment contract for contract workers.		
Corrective Actions:	Training to the person in-charge		
Assessment Conclusion:	<ol> <li>The employement contract was reviewed ac</li> <li>Training for person incharge at Telok Senga</li> <li>The evidence sighted found adequate and effect Major NC was closed.</li> </ol>	t BU was done accordingly.	



Major Nonconformities:		
Ref	Area/Process	Clause
1711670-201811-M8	Plantations (Telok Sengat Estate, Chamek Estate, Kulai Young Estate)	4.4.5.11 (Part 3)
Requirements:	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.	
Statement of Nonconformity:	Linesite inspection was not carried out as per Housing and Amenities Act 1990 (Act 446).	the Workers' Minimum Standards
Objective Evidence:	Chamek Estate: Linesite inspection was carried out once a month or twice a month in Chamek Estate which does not comply with Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) by Hospital Assistant by verified through the Linesite Inspection Form. Last inspection was carried out on 9/10/2018 and 25/10/2018.	
Corrections:	Chamek Estate:	
	To do the linesite inspection as per Worker's Minimum Standards Housing and Amenities Act 1990 (Act 446).	
Root cause analysis:	Chamek Estate:	
	Linesite inspection was done twice a month instead of weekly inspection as per Act.	
Corrective Actions:	Chamek Estate:	
	Appoint person in-charge to conduct weekly inspections as per Act	
Assessment Conclusion:	All the evidence sighted found adequate and efform inspection was done on weekly basis by Mr Faiza the Major NC was closed.	



Major Nonconformities:		
Ref	Area/Process	Clause
1711670-201811-M9	Plantations (Telok Sengat Estate, Chamek Estate, Kulai Young Estate)	4.6.3.1 (Part 3)
Requirements:	Pricing mechanisms for the products and other effectively implemented.	services shall be documented and
Statement of Nonconformity:	Credit terms of payment was not clearly stated contractors.	d in the agreement signed by the
Objective Evidence:	Telok Sengat Estate and Chamek Estate: Sampled of the agreements above found that credit terms of payment were not clearly stated in the agreement in Telok Sengat Estate and Chamek Estate. Interviewed with the contractors found that the payment system has changed to 10th -15th day of the following month for wages and 15th to 20th day of the following month for the advance which cause them to late payment for the workers' salary in Teluk Sengat Estate.	
Corrections:	Chamek Estate:	
	To amend and insert terms of payment in Contract Agreement.	
Root cause analysis:	Chamek Estate and Telok Sengat Estate:  No person incharge that monitor the contract agreement especially the credit terms of payment.	
Corrective Actions:	Chamek Estate:	
	Appoint person incharge that will monitor the Contract Agreement and the payment made.	
Assessment Conclusion:	All the evidence sighted found adequate and effective contract agreement was reviewed accordingly to Hence, the Major NC was closed.	



Major Nonconformities:		
Ref	Area/Process	Clause
1711670-201811-M10	Telok Sengat POM	4.6.3.2 (Part 4)
Requirements:	All contracts shall be fair, legal and transparent a in timely manner.	nd agreed payments shall be made
Statement of Nonconformity:	Contract agreements with the CPO transporters	were found expired.
Objective Evidence:	Telok Sengat POM: CPO transporters' agreements were found expired as below: a. Company No.: 16810-V for transporting CPO which valid from 12/5/2014 for 1-year contract. b. Company No.: 21873-W for transporting CPO which valid from 12/10/2011 for 1-year contract.	
Corrections:	Boustead Plantation Berhad Markerting Department will renew CPO transporter contracts	
Root cause analysis:	Boustead Marketing Department was not renewed the CPO transporter agreements for Yewtan Enterprise and Aik Heng Hung Sdn. Bhd.	
Corrective Actions:	Mill person in-charge need to ensure all contracts c/w CPO transporters should be renewed.	
Assessment Conclusion:	The communication between TSPO and marketing department on 9/12/2018 was sighted.	
	2. The mill engineer will ensure on the renewal of contract, refer to the communication between the mill and marketing department.	
	3. The agreement for Yewtan Enterprise and A based on marketing department. Clause 6 in sighted.	
	All the evidence sighted found adequate and effectively implemented. Hence, the Major NC was closed.	



Minor Nonconformities:			
Ref	Area/Process	Clause	
1711670-201811-N1	Telok Sengat POM and Plantations (Telok Sengat Estate, Chamek Estate, Kulai Young Estate)	4.4.1.1 (Part 3 and Part 4)	
Requirements:	Social impact should be identified and plans negative impacts and promote the positive ones		
Statement of Nonconformity:	Social Impact Assessment report was not available Estate, Chamek Estate and Telok Sengat POM.	Social Impact Assessment report was not available during the audit in Telok Sengat	
Objective Evidence:	Social Impact Assessment was carried out on 2-10/4/2018 by MEC Consultant that involved the participation of relevant stakeholders. Preliminary of SIA findings was sighted. However, the official assessment report has yet to be obtained in Telok Sengat Estate, Chamek Estate and Telok Sengat POM.		
Corrections:	Mill and estate need to ensure SIA official report plan should be developed.	are identified and management	
Root cause analysis:	Mill and estate yet to receive the SIA offical repo	ort.	
Corrective Actions:	The SIA official report will be sent by MEC Consi	ultant and SIA Management Plan	
Assessment Conclusion:	CAP was accepted. The effectiveness of the corr during next assessment.	ective action will be verified	



Minor Nonconformities:		
Ref	Area/Process	Clause
1711670-201811-N2	Plantations (Telok Sengat Estate, Chamek Estate, Kulai Young Estate)	4.4.5.4 (Part 3)
Requirements:	Management should ensure employees of contribution industry minimum standards according to the em the contractor and his employee.	
Statement of Nonconformity:	The contractors' workers were not paid according the work on rest day.	g to the Employment Act 1955 for
Objective Evidence:	Interviewed with the contractors' workers in Tele they were not paying twice per piece when they contractors also informed during stakeholder int double of wages for workers who worked on resmanagement also confirmed that they did not passampled of contractor's workers as below:  a. Passport No.: B5352355 (TSE) b. Passport No.: B9247534 (TSE) c. Passport No.: B7196678 (TSE) d. Passport No.: B4073376 (TSE) e. Passport No.: B3628873 (TSE) f. Passport No.: AT198309 (TSE) g. Passport No.: AT389686 (TSE) h. Passport No.: B2102481 (CE) i. IC No.: 84XXXX-23-5XXX (CE)	worked on rest day. The erviewed that they did not pay t day. Verified with the
Corrections:	Chamek Estate and Telok Sengat Estate:  To comply with the Employment Act 1955 for the work on rest day and to reimburse the wages accordingly.	
Root cause analysis:	Chamek Estate and Telok Sengat Estate: Contractor's workers were not paid according to work on rest day because no works offered durin holiday.	
Corrective Actions:	Chamek Estate and Telok Sengat Estate:  No works will offered during rest day/ off day ar	nd public holiday.
Assessment Conclusion:	CAP was accepted. The effectiveness of the corr during next assessment.	ective action will be verified



Opportunity For Improvement		
Ref	Area/Process	Clause
1711670-201811-I1	Telok Sengat POM	4.6.3.1 (Part 4)
Objective Evidence:	Telok Sengat POM: Sampled of contract agreement that signed by the a. Company: Lian Kin Tractor Works for backhoe was to 31/12/2018. b. Memo of Agreement No.: 002/2018 for grass cult/1/2018 to 31/12/2018. However, the credit terms for payment was not stopayment was made immediately after closing according to the contraction of the con	works which valid from 1/1/2018  utting works which valid from  ated in the agreement even the

Opportunity For Improvement		
Ref	Area/Process	Clause
1711670-201811-I2	Telok Sengat POM	4.4.5.11 (Part 4)
Objective Evidence:	Telok Sengat POM: It was found the linesite inspection was carried or POM but not covered for all quarters. In the Hous that each house was inspected once a month only inspection found that MQ 7 where the workers for system) have stayed where the housing was not i the glass windows were not available and the bas	ing Inspection Schedule found  In additional, during linesite  contractor (install firefighting n good condition such as most of

Noteworthy Positive Comments
Nil



#### 3.3 Status of Nonconformities Previously Identified and OFI

Not applicable since this is Initial Assessment.

Major Nonconformities:					
Ref	Area/Process	Clause			
NC ID from eReport					
Requirements:					
Statement of Nonconformity:					
Objective Evidence:					
Corrections:					
Root cause analysis:					
Corrective Actions:					
Assessment Conclusion:					
Stage II Status:					
	MinorNonconformities:				
Ref	Area/Process	Clause			
NC ID from eReport					
Requirements:					
Statement of Nonconformity:					
Objective Evidence:					
Correction Action Evidence:					
Assessment Conclusion:					



#### 3.4 Issues Raised by Stakeholders

IS#	Description
1	Issues:
	Workers' Representatives & Contractor's Workers – The workers informed that they have been treated equally without discrimination. They were paid according to Minimum Wage Order 2016. However, the contractors' workers have not been paid double rate per piece when worked on rest day.
	Management Responses:
	The management will ensure contractors comply with the legal requirements.
	Audit Team Findings:
	Details refer to criteria 4.4.5.5.
2	Issues:
	Contractors – They informed that they have good relationship with the management and understand the complaint procedure. However, the payment was normally paid between $10^{th}-15^{th}$ day of following month caused them late pay-out to the workers.
	Management Responses:
	The management informed that Head Office has changed the system and therefore this issue has occurred.
	Audit Team Findings:
	Details refer to criteria 4.6.3.1.
3	Issues:
	NUPW Representative (Kluang Region) – He informed that no issue reported to the management. However, he hopes that the management could have two-ways communication with NUPW Kluang representatives more frequent to have better relationship.
	Management Responses:
	The management will communicate with the representative whenever necessary.
	Audit Team Findings:
	No other issue.



#### 3.5 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1711670-201811-M1	Major (4.4.4.1-Part 4)	22/11/2018	Closed on 18/2/2019
1711670-201811-M2	Major (4.5.3.3-Part 3 & Part 4)	22/11/2018	Closed on 18/2/2019
1711670-201811-M3	Major (4.4.4.2-Part3)	22/11/2018	Closed on 18/2/2019
1711670-201811-M4	Major (4.5.3.4-Part 3)	22/11/2018	Closed on 18/2/2019
1711670-201811-M5	Major (4.5.6.1-Part 3)	22/11/2018	Closed on 18/2/2019
1711670-201811-M6	Major (4.4.2.5-Part 3)	22/11/2018	Closed on 18/2/2019
1711670-201811-M7	Major (4.4.5.6-Part 3)	22/11/2018	Closed on 18/2/2019
1711670-201811-M8	Major (4.4.5.11-Part 3)	22/11/2018	Closed on 18/2/2019
1711670-201811-M9	Major (4.6.3.1-Part 3)	22/11/2018	Closed on 18/2/2019
1711670-201811-M10	Major (4.6.3.2-Part 4)	22/11/2018	Closed on 18/2/2019
1711670-201811-N1	Minor (4.4.1.1-Part 3 & Part 4)	22/11/2018	"Open"
1711670-201811-N2	Minor (4.4.5.5-Part 3)	22/11/2018	"Open"



#### 3.6 Summary of the findings by Principles and Criteria

#### MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Plantations and Organized Smallholders

Criterio	on / Indicator	Assessment Findings	Compliance	
4.1 Prin	4.1 Principle 1: Management commitment & responsibility			
Criterio	n 4.1.1 - Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	A policy for the implementation of MSPO shall be established.  - Major compliance -	The MSPO Policy was established where the policy was signed by Sr General Manager of Boustead Plantations Berhad on 1/11/2014.	Complied	
4.1.1.2	The policy shall also emphasize commitment to continual improvement.  - Major compliance -	The policy was emphasize on the engagement and commitment to produce sustainable palm oil with the objective of improving the milling and estate operation.	Complied	
Criterio	n <b>4.1.2</b> – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.  - Major compliance -	Internal Audit was conducted once a year by Sustainability section, the 1 <sup>st</sup> internal audit was conducted on 08-18/10/2018 (Telok Sengat POM and all estate) to cover the entire criterion stated in the standard. Internal audit was led by Mr Ahmad Amirul Ariff and assist by Mr Amrul Nizam and Ms Hanani as a team member. The internal auditors were found competent to conduct the audit. Sighted the competency certificate by SIRIM QAS International Sdn Bhd which was conducted on 26-27/11/2015. During the internal audit, there was 3 Major NC and 2 OFIs were issued. All the findings were in progress of closure.	Complied	

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Criterio	on / Indicator	Assessment Findings	Compliance
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.	Internal audit procedure dated July 2015 was established by the management to include audit frequency, audit schedule, audit team, performing audit, audit responsibility and etc. Internal audit shall be carried out once a year.	Complied
	- Major compliance -		
4.1.2.3	Report shall be made available to the management for their review.	All records related to Internal Audit was maintained and available at both estate visited for review.	Complied
	- Major compliance -		
Criterio	n 4.1.3 – Management Review		
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.	The management review was conducted accordingly. The 1 <sup>st</sup> Management Review was conducted on 19/10/2018 which was chaired by Planting Directing and Sustainability Chairman. All the committee members were involved during this 1 <sup>st</sup> Management Review. All the agenda were found adequate.	Complied
	- Major compliance -	agenda were round adequate.	
Criterio	Criterion 4.1.4 – Continual Improvement		
4.1.4.1	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and	Both estate visited have developed a Continual Improvement Plan for 2018 as below:	Complied
	opportunities of the company.	To ensure the slope/ terracing area minimum or free facingsoil	
	- Major compliance -	erosion  2. To ensure zero application of highly toxicity pesticides or herbicides	

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mpany shall establish a system to improve practices in ith new information and techniques or new industry rds and technology (where applicable) that are available asible for adoption.		Complied
ith new information and techniques or new industry rds and technology (where applicable) that are available asible for adoption.		Complied
••		I
r compliance -		I
ction plan to provide the necessary resources ng training, to implement the new techniques or new y standard or technology (where applicable) shall be shed.  **Tricompliance -**	Both estate visited have developed a Continual Improvement Plan for 2018 as below:  1. To ensure the slope/ terracing area minimum or free facing soil erosion  2. To ensure zero application of highly toxicity pesticides or herbicides  3. To minimize soil destruction and reduce frequency of chemical and fertilizer application  4. To substitute chemical to cultural and biological practices  5. Repainting the workers/ staff and executive house	Complied
y sh •r	standard or technology (where applicable) shall be need.	training, to implement the new techniques or new standard or technology (where applicable) shall be need.  1. To ensure the slope/ terracing area minimum or free facing soil erosion 2. To ensure zero application of highly toxicity pesticides or herbicides 3. To minimize soil destruction and reduce frequency of chemical and fertilizer application 4. To substitute chemical to cultural and biological practices 5. Repainting the workers/ staff and executive house



Criterio	on / Indicator	Assessment Findings	Compliance
4.2.1.1	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes.  - Major compliance -	The company has maintained records of request and response, land titles and OSH plans, complaints and grievances records that make available upon request.	Complied
4.2.1.2	Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.  - Major compliance -	The company holds copies of each of the management documents that are required to be publicly available. Copies of the document such as documents related to environmental and social issues, waste management plan, records of complaints and grievances were available upon request. All the policies such as Pesticide Use Policy, Human Rights Policy and Foreign Workers Policy were publicly available in the company's website: <a href="https://www.bousteadplantations.com.my">www.bousteadplantations.com.my</a> . Others sustainability practices were also available in the website.	Complied
Criterio	n 4.2.2 - Transparent method of communication and consult	ation	
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders.  - Major compliance -	Boustead Plantations Berhad – Telok Sengat Estate has developed Communication Procedure. The scope of the procedure is to handle communication for internal and external stakeholders. The methods of communication such as formally write in, through phone call, discussion or meeting and etc. The communication is achieved through notice board, meeting minutes, trainings and newspapers. Complaint/ Suggestion Form and the Suggestion Box was implemented in the company.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4.2.2.2	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.  - Minor compliance -	Telok Sengat Estate has established a Complaint Panel Committee to handle external and internal communication/ complaint in the estate. Appointment letter dated 8/1/2018 was sighted for Senior Assistant Manager as the Vice Chairman for the committee.	Complied
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.  - Major compliance -	Stakeholder list was developed in Telok Sengat Estate and last updated on September 2018. The list has included government authorities such as DOE, DOSH and BOMBA, contractors and suppliers, local communities and NGOs.	Complied
		External stakeholder meeting was carried out on 10/10/2018 with the relevant stakeholders such as government authorities, contractors and suppliers, neighboring plantation and schools' representatives.	
Criterio	n 4.2.3 – Traceability		
4.2.3.1	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s).  - Major compliance -	Telok Sengat Palm Oil Mill and Estate implemented the supply chain program based on Bousted Plantations MSPO Traceability Procedures; Issue 1; Issue date: July 2016; Rev. # 2; Rev. date: March 2918. The procedure was approved by MSPO Chairman which covering the implementation of all supply chain requirements for both POM and estate.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system.  - Major compliance -	Regular inspections on compliance with the established traceability system were conducted through periodical internal audit. Furthermore, the estate management and staff responsible to conduct related inspections on compliance of all operations including traceability	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		system. Verification on site confirmed the inspections were regularly implemented accordingly.	
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system.  - Minor compliance -	The procedure also specified that the Sustainability Chairman shall have the overall responsibility for the implementation of the procedure with assignment of relevant personnel from various departments to assist in the implementation. At Telok Sengat Business Unit, Mill Manger and estate manager responsible for the MSPO implementation.	Complied
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained.  - Major compliance -	Records of FFB sales & delivery including FFB Weighbridge Tickets together with FFB Delivery Note (Chit) and Daily Record (FFB Receiving Details Daily Report) were maintained. Sighted samples record available as following:  i) FFB Delivery Note # TSEG-03-460, Date:25/8/18, Field:PM03B,	Complied
		Type: L/F  ii) FFB Delivery Note # 00757, Date: 26/8/18, Field: PM95, PM96, PJ11, Type: FFB	
4.3 Prin	ciple 3: Compliance to legal requirements		
Criterio	n 4.3.1 – Regulatory requirements		
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.	The list of permit and license required for the operations of the estate was sighted. The sample of permit and license:	Complied
	- Major compliance -	<ol> <li>MPOB License: 615231002000 expiry 24/7/2018 (TSE)</li> <li>Diesel permit: J033067, expiry on 11/6/2019 (TSE)</li> <li>Diesel permit: J030198, expiry on 22/1/2019 (TSE)</li> <li>MPOB License: 613906002000 expiry 31/7/2019 (CE)</li> </ol>	

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Criterio	on / Indicator	Assessment Findings	Compliance
		5. Diesel permit-under renewal process. Surat sokongan Letter of from BOMBA dated 4/11/2018 was sighted.	
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register.  - Major compliance -	LORR was established to cover all legal acts, regulations and other requirement related to POM and supply base. The sample of Act and Legal:  1. OSHA 1994 2. FMA 1967 3. Pesticide Act 1974 4. Electrical Supply (Amendment) Act 2015 5. Fire Services Act 6. Environmental Quality Act 7. Local Government Act	Complied
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.  - Major compliance -	LORR was established to cover all legal acts, regulations and other requirement related to POM and supply base. The sample of Act and Legal:  1. OSHA 1994 2. FMA 1967 3. Pesticide Act 1974 4. Electrical Supply (Amendment) Act 2015 5. Fire Services Act 6. Environmental Quality Act 7. Local Government Act  Last evaluation was conducted on 2/8/2018.	Complied

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Criterio	on / Indicator	Assessment Findings	Compliance
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.  - Minor compliance -	Tracking system available to identify changes in the relevant regulations through head office, sustainability team, website information and the information are communicated from the Head Office (Sustainability Section). Boustead Plantations Berhad have centralised system for tracking any changes in the law and subscribe into Lawnet. The latest communication was done on 9/11/2018 regarding Employment Insurance System Act 2017.	Complied
Criterio	n 4.3.2 – Lands use rights		
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.  - Major compliance -	Telok Sengat Estate hold 66 land titles (under CIMB Islamic Trustee Berhad:  1. Grant No: #373, Lot 9071  2. Grant No: #25899, Lot 1292  3. Grant No: #101546, Lot 865  4. Grant No: #25900, Lot 1293  5. Grant No: #82693, Lot 396  Chamek Estate hold 5 land titles (under CIMB Islamic Trustee Berhad and Selangor Coconuts Bhd):  1. Grant No: #96683, Lot 72  2. Grant No: #89011, Lot 266  3. Grant No: #89006, Lot 132  4. Grant No: #90629, Lot 181  5. Grant No: #90630, Lot 183  For Chamek Estate, the management has changed the registry of companies a few times after Selangor Coconuts Bhd. The latest	Complied



Criterion / Indicator		Assessment Findings	Compliance
		changes for registry of companies was done 10/4/2004 from Kuala Sidim Berhad to Boustead Plantations Berhad.  The annual return of a company for Boustead Telok Sengat Sdn Bhd (Telok Sengat Estate and Telok Sengat POM) and Boustead Sungai Manar Sdn Bhd (Chamek Estate, Kulai Young Estate & Bekoh Estate) was sighted, where 100% of share under Boustead Plantations Berhad.  The supplemental agreement between CIMB Trustee Berhad and Boustead Telok Sengat Sdn Bhd dated 5/3/2010 and between CIMB Trustee Berhad and Boustead Sungai Manar Sdn Bhd dated 5/3/2010 were sighted.	
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.  - Major compliance -	Telok Sengat Estate hold 66 land titles (under CIMB Islamic Trustee Berhad:  1. Grant No: #373, Lot 9071  2. Grant No: #25899, Lot 1292  3. Grant No: #101546, Lot 865  4. Grant No: #25900, Lot 1293  5. Grant No: #82693, Lot 396  Chamek Estate hold 5 land titles (under CIMB Islamic Trustee Berhad and Selangor Coconuts Bhd):  1. Grant No: #96683, Lot 72  2. Grant No: #89011, Lot 266  3. Grant No: #89006, Lot 132  4. Grant No: #90629, Lot 181  5. Grant No: #90630, Lot 183	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		For Chamek Estate, the management has changed the registry of companies a few times after Selangor Coconuts Bhd. The latest changes for registry of companies was done 10/4/2004 from Kuala Sidim Berhad to Boustead Plantations Berhad.  The annual return of a company for Boustead Telok Sengat Sdn Bhd (Telok Sengat Estate and Telok Sengat POM) and Boustead Sungai Manar Sdn Bhd (Chamek Estate, Kulai Young Estate & Bekoh Estate) was sighted, where 100% of share under Boustead Plantations Berhad.  The supplemental agreement between CIMB Trustee Berhad and Boustead Telok Sengat Sdn Bhd dated 5/3/2010 and between CIMB Trustee Berhad and Boustead Sungai Manar Sdn Bhd dated 5/3/2010 were sighted.	
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.  - Major compliance -	A legal boundary was clearly demarcated. Site visit to boundary at field PJ14/B (TSE) with smallholder, found that the boundary stone was maintained. Some area the management has constructed the trenches. At Chamek Estate (PM95A), the management had constructed the trenches as a boundary between the estate and smallholders.	Complied
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall	There is no land dispute in the Telok Sengat Business Unit at the time of audit. The lands are leased from CIMB Trustee Berhad via verified with the land titles. There was no encroachment of land by the Telok Sengat Business Unit.	Complied

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Criterion / Indicator		Assessment Findings	Compliance			
	be made available and that these should have been accepted with free prior informed consent (FPIC).					
	- Minor compliance -					
Criterio	Criterion 4.3.3 – Customary rights					
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.  - Major compliance -	The estate lands are legally owned by the company. The existing estates are not encumbered by any customary land rights. The company has constructed trenches, wooden pegs and gates to differentiate the land boundaries. No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit.	Complied			
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available.  - Minor compliance -	The estate lands are legally owned by the company. The existing estates are not encumbered by any customary land rights. The company has constructed trenches, wooden pegs and gates to differentiate the land boundaries. No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit.	Complied			
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available.  - Major compliance -	The estate lands are legally owned by the company. The existing estates are not encumbered by any customary land rights. The company has constructed trenches, wooden pegs and gates to differentiate the land boundaries. No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit.	Complied			
4.4 Principle 4: Social responsibility, health, safety and employment condition						



Criterion / Indicator		Assessment Findings	Compliance		
Criterio	Criterion 4.4.1: Social Impact Assessment (SIA)				
4.4.1.1	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.  - Minor compliance -	Social Impact Assessment was carried out on 2-10/4/2018 by MEC Consultant that involved the participation of relevant stakeholders. Preliminary of SIA findings was sighted. However, the official assessment report has yet to be obtained in Telok Sengat Estate and Telok Sengat POM.	Minor Noncompliance		
		Thus, minor NC was raised.			
Criterion 4.4.2: Complaints and grievances					
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented.  - Major compliance -	Telok Sengat Estate has developed Flowchart of Complaint/ Suggestion (Grievance Procedure) to receive the complaints from internal and external stakeholders. The flowchart has clearly stated the Social Officer will be receiving the complaints. Besides, the company has developed Whistleblowing Policy dated 11/1/2011 signed by Senior General Manager.	Complied		
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.  - Major compliance -	Complaint/ Suggestion Form was established and implemented in the estates to record any complaints from the stakeholders. The estate management has taken action to rectify the complaints and updated the actions taken in the form and Complaint Report Book. The complainant has acknowledged on the complaint form after the issue has been resolved by the management in Chamek Estate.	Complied		



Criterio	on / Indicator	Assessment Findings	Compliance
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.  - Minor compliance -	Complaint/ Suggestion Form was implemented and the empty form was available in the suggestion box area in front of the office in Telok Sengat Estate. Interviewed with the stakeholders confirmed that they are understood about the complaint procedure.	Complied
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.	Interviewed with the stakeholders confirmed that they are understood about the complaint procedure.	Complied
	- Minor compliance -		
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request.  - Major compliance -	The company has implemented the system since August 2018. Therefore, records of complaint were since August 2018. However, records to show that the complaint have been resolved were not available in Telok Sengat Estate. Thus, Major NC was raised.	Major Noncompliance
Criterio	n 4.4.3: Commitment to contribute to local sustainable devel	opment	<u>'</u>
4.4.3.1	Growers should contribute to local development in consultation with the local communities.  - Minor compliance -	The management has made contribution to the local communities and workers such as donation to the school and temple activities upon request by the stakeholders. Besides, the company has donated paint material to local authority. The company also provided job opportunity to the local communities.	Complied
Criterio	n 4.4.4: Employees safety and health		
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.	Telok Sengat certification unit has established Safety and Health Policy, dated 1/6/2012 signed by Group Managing Director. Safety programme schedule for 2018 was established. The programme	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	- Major compliance -	comprises of emergency response plan (ERP), OSH management system, risk management, safety committee activities, medical surveillance. The last CHRA was done on September 2015 by Env Consultancy & Monitoring Services Sdn Bhd (JKKP IH 127/171-2(193)). The medical surveillance was last conducted on 20/1/2018 by OHD (JKKP KES 127/669/1(597)). All workers found to be fit for work.	
4.4.4.2	The occupational safety and health plan shall cover the following:  a) A safety and health policy, which is communicated and	<ul><li>a) The communication of safety and health policy was done by displayed the policy on the notice board at the estate office.</li><li>b) SOP for HIRARC was established. Last reviewed of the</li></ul>	Major noncompliance
	implemented.	assessment was done on March 2018 to include Harvesting,	
	b) The risks of all operations shall be assessed and documented.	Manuring, Spraying, transportation, Replanting and etc. c) A formal training programme on all aspects of OSH and MSPO was established and implemented. Training for various sategories	
	c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:	was established and implemented. Training for various categories of operators, including all field and office staff, with regards to individual duties and training needs had been reviewed and	
	<ul> <li>i. all employees involved shall be adequately trained on safe working practices</li> </ul>	found to be complied. The records of training were available at estate office. Sample training checked:	
	ii. all precautions attached to products shall be properly	Date Training Remark  1/11/2018 Spraying TSE	
	observed and applied	1/11/2018 Spraying TSE 26/9/18 Policy training	
	d) The management shall provide the appropriate PPE at the	22/5/18 Harvesting	1
	place of work to cover all potentially hazardous operations as	2/6/18 Manuring	
	identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).	2/4/18 Spraying CE	
		4/6/18 Pruning	
	e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe	16/7/18 Manuring	
	handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation	26/3/18 Manual weeding 27/3/18 Rat baiting	



Criterion / Indicator		Assessment Findings	Compliance
1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.  f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.  g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.  h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.  i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.  j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.  - Major compliance -	e) f) g)	protective equipments were provided. However, at Chamek Estate, the PPE for harvesting area and at TSE, the PPE for worker working at height was not fully implemented. The operating unit 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 were kept in the store and securely locked and comply with regulation.  The responsible persons were the Estate Manager and Assistant Manager of the respective operating units.	



Criterio	on / Indicator	Assessment Findings	Compliance
		Records of incident and accident were available, using internal reporting system. Records on Lost Time Incident (LTI) metrics found to be satisfactory.	
		Refer to (d) and (i), thus, Major NC was raised.	
Criterio	n 4.4.5: Employment conditions		
4.4.5.1	The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.  - Major compliance -	Boustead Plantations Berhad has developed Human Rights Policy dated 11/1/2016 signed by Senior General Manager. The company is committed to ensure every individual are treated with fairness, dignity and respect. The company will respect the rights of every individual. They also recognize their responsibilities to respect human rights and avoid complicity in human rights abuses. Training of the policy was conducted on 19/9/2018 in Chamek Estate. Seen the training attendance list and photo of the training. Besides, the policy was publicly displayed at the notice board outside the office.	Complied
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.  - Major compliance -	Boustead Plantations Berhad has established Equal Opportunities Policy dated 11/1/2011 signed by Senior General Manager. The company will ensure all the relevant parties will be treated equally and no discrimination based on race, caste, nationalities, religion, gender, age and etc. Interviewed with the workers from different nationalities, gender and age confirmed that no discrimination was occurred in the estate.	Complied
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed	There were employment contracts for workers. Pay and conditions are documented and are above the Minimum Wage Order 2016. Sampled	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.  - Major compliance -	of employment contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. The daily rate of RM 38.46 for the workers was stated in the contract according to Minimum Wage Order 2016. Sampled of the payslips confirmed that the workers were paid in accordance with Minimum Wage Order 2016.	
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.  - Minor compliance -	The contractors have signed on the contract agreement with the terms of they must comply with legal requirements on the wages for their workers was clearly stated. Sampled of payslips for contractors' workers in Chamek Estate for Month November 2017, June 2018 and October 2018 that have achieved Minimum Wage Order 2016 as below:  a. Passport No.: AS 576138 b. Passport No.: AS 576140  The contractors' workers also signed on the employment contract where basic salary, annual leave and public holiday entitlement was clearly outlined in the contract.  However, interviewed with the contractors' workers in Telok Sengat Estate confirmed that they were not paying twice per piece when they worked on rest day. The contractors also informed during stakeholder interviewed that they did not pay double of wages for workers who worked on rest day. Verified with the management also confirmed that they did not pay double for rest day work. Sampled of contractor's workers as below: a. Passport No.: B5352355 (TSE) b. Passport No.: B9247534 (TSE)	Minor Noncompliance



Criterio	on / Indicator	Assessment Findings	Compliance
		c. Passport No.: B7196678 (TSE) d. Passport No.: B4073376 (TSE) e. Passport No.: B3628873 (TSE) f. Passport No.: AT198309 (TSE) g. Passport No.: AT389686 (TSE) h. Passport No.: B2102481 (CE) i. IC No.: 84XXXX-23-5XXX (CE)  Thus, Minor NC was raised.	
4.4.5.5	The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.  - Major compliance -	All the direct employment workers will be registered in the Marterfile Prooflist and Labour Registers where personal details such as name, nationality, date of employed, job offered, salary and date of birth was stated in the list.  The details for the contractors' workers are registered in the Workers Registration Form in Chamek Estate.	Complied
4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.  - Major compliance -	Employment contracts for checkroll workers were acknowledged and kept a copy by the workers verified through interviewed with the workers. The contract was in the language that understood by the workers. The terms and conditions were clearly stated in the contract such as salary, annual leaves and public holiday entitlement, rate of work on rest day and overtime. Sampled of employment contracts as below:  a. Employee No.: 0516J (CE) b. Employee No.: 0520A (CE) c. Employee No.: 0545H (CE)	Major Noncompliance



Criterio	on / Indicator	Assessment Findings	Compliance
		d. Employee No.: 2814C (TSE) e. Employee No.: 2887E (TSE) f. Employee No.: 2550D (TSE)	
		Employment contracts for contractor workers were signed. However, the terms stated in the contract was not according to Employment Act 1955 as below:	
		a. Workers who worked more than 5 years and above only will be entitled with 60 days of sick leave per year if admitted to hospital which indicates those who has work less than 5 years is not entitled with the hospitalization leave in Telok Sengat Estate and Chamek Estate.	
		b. For daily rated contractor's workers, the minimum rate of overtime per hour was RM 6.50 as stated in the contract. However, for daily rated RM 38.46, minimum rate of overtime per hour should be RM 7.20 found in Telok Sengat Estate.	
		Thus, Major NC was raised.	
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.	The estate management has maintained Field & General Workers Daily Attendance Record and Bunches Record to record the attendance, tonnage, overtime and etc for individual checkroll workers.	Complied
	- Major compliance -		
4.4.5.8	The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed	The working hour and break time has been clearly stated in the employment contract. Besides, the attendance record was available	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
	and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.	and able to trace through Field & General Workers Daily Attendance Record.	
	- Major compliance -		
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.  - Major compliance -	Documented payslip was distributed to individual workers on the day of payment. Wages and overtime were paid according to the "Field & General Workers Daily Attendance. Total hours of overtime and daily attendance has recorded in the checkroll book. Sampled the payslip for month November 2017, June 2018 and October 2018 as below:  j. Employee No.: 0516J (CE) k. Employee No.: 0520A (CE) l. Employee No.: 0545H (CE) m. Employee No.: 0498G (CE) n. Employee No.: 2814C (TSE) o. Employee No.: 2863I (TSE) p. Employee No.: 2863A (TSE) q. Employee No.: 2550D (TSE)  All of them above have achieved the Minimum Wage Order 2016. Hours of overtime has recorded in the payslip as well.	Complied
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions.	The management provided free medical facilities to all the workers and dependents. The company also subsidized water and electricity to certain units.	Complied
	- Minor compliance -		



Criterio	n / Indicator	Assessment Findings	Compliance
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.  - Major compliance -	Linesite inspection was carried out once a month or twice a month in Chamek Estate which does not comply with Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) by Hospital Assistant by verified through the Linesite Inspection Form. Last inspection was carried out on 9/10/2018 and 25/10/2018. Thus, Major NC was raised.	Major Noncompliance
4.4.5.12	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.  - Major compliance -	Boustead Plantations Berhad has developed a Sexual Harassment Policy signed by Senior General Manager, En. Shoib Abdullah dated 11/1/2011. The company will ensure the comfort and security of every employee, clients, business partners and public that involved in the plantations' activities. The policy has clearly stated the types of sexual harassment such as verbal, visual, psychology, physical and etc. Gender committee was established in Chamek Estate and meeting was conducted on 29/9/2018. Complaint procedure was briefed during the meeting for the female workers.	Complied
4.4.5.13	The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.  - Major compliance -	Boustead Plantations Berhad has developed Freedom of Association Policy dated 11/11/2011 signed by Senior General Manager, En. Shoib Abdullah. The company is committed and allowed their stakeholders such as employees, clients, business partner and etc to form or join any association. The workers are allowed to join NUPW. There are total 25 workers have joined Union as to date on October 2018 in Chamek Estate.  NUPW meeting was conducted on 21/3/2018 in Chamek Estate and meeting minutes was sighted. Issues raised during the meeting was responded immediately by the management.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not exposed to hazardous working conditions.  - Major compliance -	Boustead Plantations Berhad has developed Employment of Child and Age Limit Policy dated 11/1/2011. The company will comply with the Children and Young Persons (Employment) Act 1966 and ILO Convention 138 (1973) Article 1-3. No workers less than 16 years old will be recruited and less than 18 years old for hazardous work. Document verified on the Employee Master List confirmed that all the workers employed were above 18 years old.	Complied
Criterion	4.4.6: Training and competency		
4.4.6.1	All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.  - Major compliance -	A formal training programme on all aspects of MSPO was established and implemented. Training for various categories of operators, including all field and office staff, with regards to individual duties and training needs were reviewed and found to be complied.  Training programme planned for year 2017 was consistently implemented. The programme includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to:  - workers exposed to machinery and high noise levels,  - workers working in confined space,  - harvesters  - pesticides operators  - manurers  The records of training were available at mill and estate office. Sample training checked:    Date   Training   Remark	Complied



Criterion / Indicator	Assessment Findings	Compliance
4.4.6.2 Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.  - Major compliance -	1/11/2018   Spraying   TSE   25/10/18   S/waste   26/9/18   Policy training   22/5/18   Harvesting   2/6/18   Manuring   6/8/18   Recycle   CE   19/9/18   Policy training   2/4/18   Spraying   4/6/18   Pruning   16/7/18   Manuring   26/3/18   Manual weeding   27/3/18   Rat baiting   Rat baiting   A formal training programme on all aspects of MSPO was been established and implemented. Training for various categories of operators, including all field and office staff, with regards to individual duties and training needs were reviewed and found to be complied.  Training programme planned for year 2017 was consistently implemented. The programme includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to:  - workers exposed to machinery and high noise levels,  - workers working in confined space,  - harvesters  - pesticides operators  - manurers	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4.4.6.3	A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.  - Minor compliance -	A formal training programme on all aspects of MSPO was established and implemented. Training for various categories of operators, including all field and office staff, with regards to individual duties and training needs were reviewed and found to be complied.  Training programme planned for year 2017 was consistently implemented. The programme includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to:  - workers exposed to machinery and high noise levels,  - workers working in confined space,  - harvesters  - pesticides operators  - manurers	Complied
4.5 Prin	ciple 5: Environment, natural resources, biodiversity	and ecosystem services	
Criterio	n 4.5.1: Environmental Management Plan		
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.  - Major compliance -	<ul> <li>The management had established the environmental management programme for the year 2018. The plan was as follow:</li> <li>1. To ensure water quality meets the environmental quality act 1974</li> <li>2. To ensure the slope/ terracing area minimum or free facing soil erosion</li> <li>3. To ensure zero application of highly toxicity pesticides or herbicides</li> </ul>	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4512	The environmental management plan shall sever the followings	<ul> <li>4. To minimize soil destruction and reduce frequency of chemical and fertilizer application</li> <li>5. To substitute chemical to cultural and biological practices</li> <li>To reduce conserve soil fertility</li> <li>The environmental management plan covered in the established action</li> </ul>	Committeed
4.5.1.2	The environmental management plan shall cover the following:  a) An environmental policy and objectives;	plan of significant environmental aspects identified and impacts evaluated as per documents sighted as following:	Complied
	b) The aspects and impacts analysis of all operations.	- Environmental Aspect and Impact Identification 2018; Serial # BEA/5.1/EAI dated 8/2/2018	
	- Major compliance -	- Environmental Impact Evaluation Form Serial # EIE/2018/01-1 to EIE/2018/17-02 dated 8/2/1817/7/2017	
		The estate implemented the relevant management plan for their existing planting which covered all field and facilities operational activities including operation of field upkeeps, machinery repair workshop, spraying and harvesting.	
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.	The developed environmental improvement plan to mitigate the negative impacts and to promote the positive ones were effectively implemented and monitored.	Complied
	- Major compliance -		
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan.	Few environmental plan was established (environmental management plan and waste management plan). The plan was as follow:	Complied
	- Minor compliance -	To ensure water quality meets the environmental quality act     1974	
		To ensure the slope/ terracing area minimum or free facing soil erosion	



Criterio	on / Indicator	Assessment Findings	Compliance
		To ensure zero application of highly toxicity pesticides or herbicides	
		To minimize soil destruction and reduce frequency of chemical and fertilizer application	
		5. To substitute chemical to cultural and biological practices	
		6. To reduce conserve soil fertility	
		7. To recycle waste	
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives.  - Major compliance -	The above programs were regularly communicated by estate management to all employees from time to time during routine workers assembly. The recent specific biodiversity and environmental policy briefing was conducted on 2/4/18 by G-Planters which was attended by all estate staff and employees	Complied
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.  - Major compliance -	Specific Environmental Aspects & Impacts reviews were conducted annually at each operating units. Briefings were done as part of the environmental management plan on regular basis including during workers daily muster briefing and weekly assembly. The latest meeting was conducted on 19/9/2018 at Chamek Estate.	Complied
Criterio	n 4.5.2: Efficiency of energy use and use of renewable energy	ју	
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy	There was a plan established for improving efficiency of the use of fossil fuel. Sighted the estate diesel consumption 2018. Diesel consumption/FFB produced: 2.18 l/mt (Oct 2018).	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
	including fossil fuel, electricity and energy efficiency in the operations over the base period.		
	- Major compliance -		
4.5.2.2	The oil palm premises shall estimate the direct usage of non- renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.	The estate was established estimation on total energy required. This estimation was compared to the actual usage by monthly and reported to the head office for monitoring.	Complied
	- Major compliance -		
4.5.2.3	The use of renewable energy should be applied where possible.	No renewable energy at Telok Sengat Estate and Chamek Estate.	Complied
	- Minor compliance -		
Criterion	1 4.5.3: Waste management and disposal		
4.5.3.1	All waste products and sources of pollution shall be identified and documented.	All waste products and sources of pollution was identified in Waste Management Action Plan Year 2018 for the estate. Based on the Waste Management Action Plan Year 2018 the following wastes and its	Complied
	- Major compliance -	sources were identified:	
		<ul> <li>Domestic waste: Rubbish from linesite, office and etc.</li> <li>Scheduled waste: SW305, SW306, SW 409</li> <li>Recyclable waste: Empty chemical container, empty fertilizer bag, palm fronds, etc.</li> </ul>	



Criterio	on / Indicator	Assessment Findings	Compliance
4.5.3.2	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:  a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products  - Major compliance -	As above, all waste products and sources of pollution was identified in Waste Management Action Plan Year 2018 for the estate. Site visit confirmed that the practice of reduce, reuse and recycle of materials was implemented.  Segregation of wastes i.e. general wastes and scheduled wastes were verified to be satisfactory. Proper storage areas were identified for the storage of the recyclable wastes at the estate.	Complied
4.5.3.3	The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.  - Major compliance -	Visit to estate field and premises shown the management and disposal plan has been implemented accordingly. Records sighted for SW i.e. Inventory of Scheduled Wastes; Ref.: 01IU78X0; Inventory # 2018061116IU78X092018. As at November 2018, no disposal of scheduled waste. The SW409 was 1 <sup>st</sup> generated on 25/8/2019 (0.205mt).  At Chamek Estate (Scheduled Waste Store), the scheduled waste was not properly labelling. Thus, Major NC was raised.	Major Noncompliance
4.5.3.4	Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the	Visit to estates confirmed that all pesticides stored at chemical store where empty chemical containers were triple rinsed and punctured. The containers were collected by G-Planter for recycle purposes.  However, no record of empty container that sent for recycle to G-Planters at TSE. Thus, Major NC was raised.	Major Noncompliance



Criterio	on / Indicator	Assessment Findings	Compliance
	national programme on recycling of used HDPE pesticide containers.		
	- Major compliance -		
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.	The management used to segregate the waste, i.e. general wastes and scheduled wastes was verified to be satisfactory.	Complied
	- Minor compliance -	Proper storage areas were identified for the storage of the recyclable wastes.	
Criterio	n 4.5.4: Reduction of pollution and emission		
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.	Based on the assessment done by the estate of all polluting activities as of the Environment Aspect and Impact assessment, identified sources were fertilizer, diesel and pesticide chemicals.	Complied
	- Major compliance -		
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented.	Action plan to reduce identified significant pollutants including IPM implementation, empty chemical container & empty fertilizer bags	Complied
	- Major compliance -	recycle.	
Criterio	n 4.5.5: Natural water resources		
4.5.5.1	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:	Documented Water Management Plan Year 2017 inclusive of location; wastewaters produced; treatment/containment method; reuse/recycle/disposal method was sighted. The plan was as follow:  - To ensure water quality meets the environmental quality act 1974	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	<ul> <li>a. Assessment of water usage and sources of supply.</li> <li>b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities.</li> <li>c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</li> <li>d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</li> <li>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</li> <li>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</li> <li>- Major compliance -</li> </ul>	<ul> <li>To ensure the slope/ terracing area minimum or free facing soil erosion</li> <li>To minimize soil destruction</li> <li>Protection of water courses and wetlands implemented as per established policy of slope and river buffer protection policy (Refer <i>Polisi Zon Perlindungan Cerun dan Zon Penampan Sungai</i>); dated 12/1/2015.</li> <li>At Chamek Estate, there was no river across the estate.</li> </ul>	
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.  - Minor compliance -	No river at both estate visited.	Complied
4.5.5.3	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles).	The estate practice water harvesting at strategic locations. They had constructed the silt pit at strategic area.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	- Minor compliance -		
Criterio	n 4.5.6: Status of rare, threatened, or endangered species ar	nd high biodiversity value	
4.5.6.1	Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:  a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.  b) Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.  - Major compliance -	The HCV assessment was done by the Malaysia Environmental Consultant on 2-10/4/2018, however the report yet to be received by the management. Thus Major NC was raised.	Major Noncompliance
4.5.6.2	If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:  a) Ensuring that any legal requirements relating to the protection of the species are met.  b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.  - Major compliance -	The HCV assessment was done by the Malaysia Environmental Consultant on 2-10/4/2018, however the report yet to be received by the management. Refer to Major NC raised under 4.5.6.1.	Major Noncompliance



Criterio	on / Indicator	Assessment Findings	Compliance
4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.  - Major compliance -	The HCV assessment was done by the Malaysia Environmental Consultant on 2-10/4/2018, however the report yet to be received by the management. Refer to Major NC raised under 4.5.6.1.	Major Noncompliance
Criterio	1 4.5.7: Zero burning practices		
4.5.7.1	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice.	There were two fields under replanting in Chamek Estate, PM92A and PM93B for total 40.2 ha. Site visit to the field confirmed that no sign of burning during replanting process.	Complied
	- Major compliance -	The company has implemented Clearing Methods (From Oil Palm), O.P.C. No. 51.c – July 1999 where the company implemented zero burning unless there were incidences of Basal Stem Rot [BSR] on the old stands or high risk of Oryctes infestation, then partial burning and pulverisation are to be carried out.	
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop.	The visit to estate field confirmed no use of fire for land preparation during replanting. Hence, no special application made and no approval granted.	Complied
	- Major compliance -		
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws.	The visit to estate field confirmed no use of fire for land preparation during replanting. Hence, no special application made and no approval granted.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	- Major compliance -		
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.	The visit to estate field confirmed no use of fire for land preparation during replanting. Hence, no special application made and no approval granted.	Complied
	- Minor compliance -		
4.6 Prin	ciple 6: Best Practices		
Criterio	n 4.6.1: Site Management		
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.  - Major compliance -	Boustead Plantations Bhd has established the agriculture manual (Oil Palm Circular) covers felling and clearing, planting material, weeding, lallang, manuring, pest & disease, census & thinning out, drains, road & bridges, soil/water conservation, boundaries, fences & survey, supplying, pruning, collection (harvesting), external transport and etc.	Complied
4.6.1.2	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.  - Major compliance -	The implementation in both estate was consistent with the Quality Assurance Manual and Work Instruction. Sighted Internal Audit report which was conducted once a year by Sustainability section, the 1 <sup>st</sup> internal audit was conducted accordingly to cover the entire criterion stated in the standard and SOP.	Complied
4.6.1.3	A visual identification or reference system shall be established for each field.	Field marking was sighted at both estate visited.	Complied

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Criterio	on / Indicator	Assessment Findings	Compliance
	- Major compliance -		
Criterio	n 4.6.2: Economic and financial viability plan		
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.	Boustead Plantations Berhad has implemented a management system for monitoring and reporting of performance against production targets for achieving long-term economic and financial viability.	Complied
	- Major compliance -		
4.6.2.2	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years.	The earlier planting was in year 1995 and the next replanting would be in year 2020. Replanting programme planning has established until year 2025.	Complied
	- Major compliance -		
4.6.2.3	The business or management plan may contain:	Chamek Estate has an annual operating budget for the calendar year 2018 and five-year projections (2019 - 2023) for production. The plan	Complied
	a) Attention to quality of planting materials and FFB	includes age profile, yield projection and cost per tonne of FFB	
	b) Crop projection: site yield potential, age profile, FFB yield trends	production and etc. CAPEX for Year 2018 are such as perimeter fencing for staff quarters and purchase one unit of Kubota tractor.	9
	c) Cost of production: cost per tonne of FFB		
	d) Price forecast		
	e) Financial indicators: cost benefit, discounted cash flow, return on investment		
	- Major compliance -		



Criterio	on / Indicator	Assessment Findings	Compliance
4.6.2.4	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.  - Major compliance -	Bosutead Plantations Berhad has monitored the estate performance against the estimates. They have monitored the performance through Estate Weekly Report and action plan was developed if necessary.	Complied
Criterio	n 4.6.3: Transparent and fair price dealing		
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented.  - Major compliance -	Sampled of the agreements above found that credit terms of payment were not clearly stated in the agreement in Telok Sengat Estate and Chamek Estate. Interviewed with the contractors found that the payment system has changed to 10 <sup>th</sup> -15 <sup>th</sup> day of the following month for wages and 15 <sup>th</sup> to 20 <sup>th</sup> day of the following month for the advance which cause them to late payment for the workers' salary in Telok Sengat Estate. Thus, Major NC was raised.	Major Noncompliance
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.  - Major compliance -	Sampled of contract agreement that signed by the contractors as below:  a. Company No.: JM0201536-K for FFB harvesting, internal transport/ loading FFB & sundry works which valid from 1/1/2018 to 31/12/2018.  b. Company No.: JM-0823801-U) for FFB harvesting, spraying, manuring, palm base sanitation and lent labour which valid from 1/1/2018 to 31/12/2018.	Complied
Criterion 4.6.4: Contractor			
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required	Sampled of the contract agreement found that Clause 22 has stated that the contractors have to comply with MSPO/ RSPO requirements as below:	Complied



Criterio	on / Indicator	Assessment Findings	Compliance	
	documentation and information.  - Major compliance -	<ul> <li>a. Company No.: JM0201536-K for FFB harvesting, internal transport/ loading FFB &amp; sundry works which valid from 1/1/2018 to 31/12/2018.</li> <li>b. Company No.: JM-0823801-U) for FFB harvesting, spraying, manuring, palm base sanitation and lent labour which valid from 1/1/2018 to 31/12/2018.</li> </ul>		
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor.  - Major compliance -	The contractors have signed on the contract agreement prior to provide services. Seen the contract agreement and details as refer to Criterion 4.6.3.1.	Complied	
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.  - Minor compliance -	Boustead Plantations Berhad has agreed for BSI auditors to verify the assessment through a physical inspection if required.	Complied	
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted.  - Major compliance -	The contractor will submit the invoice for that particular month for all the works done to the estate management and payment will be made by head office accordingly. Seen the tax invoice as below:  a. Invoice No.: L1602618049 dated 31/10/2018 b. Invoice No.: L1602618050 dated 31/10/2018 Seen the payment voucher# 002/2018 dated 12/11/2018 for the invoices above.	Complied	
4.7 Prin	ciple 7: Development of new planting			
Telok Se	Telok Sengat Business Unit- No new planting.			



#### MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mill

Criterio	on / Indicator	Assessment Findings	Compliance		
4.1 Princ	4.1 Principle 1: Management commitment & responsibility				
Criterio	1 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy				
4.1.1.1	Policy for the implementation of MSPO shall be established.  - Major compliance -	The MSPO Policy was established where the policy was signed by Sr General Manager of Boustead Plantations Berhad on 1/11/2014.	Complied		
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation.  - Major compliance -	The policy was emphasize on the engagement and commitment to produce sustainable palm oil with the objective of improving the milling and estate operation.	Complied		
Criterion	1 4.1.2 – Internal Audit				
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.  - Major compliance -	Internal Audit was conducted once a year by Sustainability section, the 1 <sup>st</sup> internal audit was conducted on 08-18/10/2018 (Telok Sengat POM and all estate) to cover the entire criterion stated in the standard. Internal audit was led by Mr Ahmad Amirul Ariff and assist by Mr Amrul Nizam and Ms Hanani as a team member. The internal auditors were found competent to conduct the audit. Sighted the competency certificate by SIRIM QAS International Sdn Bhd which was conducted on 26-27/11/2015. During the internal audit, there was 3 Major NC and 2 OFIs were issued. All the findings were in progress of closure.	Complied		



Criterio	on / Indicator	Assessment Findings	Compliance
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.	Internal audit procedure dated July 2015 was established by the management to include audit frequency, audit schedule, audit team, performing audit, audit responsibility and etc. Internal audit shall be carried out once a year.	Complied
	- Major compliance -		
4.1.2.3	Reports shall be made available to the management for their review.	All records related to Internal Audit was maintained and available	Complied
	- Major compliance -	at both estate visited for review.	осрос.
Criterio	n 4.1.3 – Management Review		
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.	The management review was conducted accordingly. The 1 <sup>st</sup> Management Review was conducted on 19/10/2018 which was chaired by Planting Directing and Sustainability Chairman. All the committee members were involved during this 1 <sup>st</sup> Management	Complied
	- Major compliance -	Review. All the agenda were found adequate.	
Criterio	n 4.1.4 — Continual Improvement		
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company.	Telok Sengat POM was developed a Continual Improvement Plan for 2018 as below:  1. To ensure BOD below 100ppm at final discharge  2. To upgrade from single pass opacity to double pass opacity	Complied
	- Major compliance -	3. Reduce GHG emission	
		<ul><li>4. To capture and remove dust emissions</li><li>5. To upgrade existing empty bunch hooper drainage system</li></ul>	



Criterio	on / Indicator	Assessment Findings	Compliance
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.  - Major compliance -	<ol> <li>To monitor smoke emissions from boiler and diesel genset operation</li> <li>Telok Sengat POM was developed a Continual Improvement Plan for 2018 as below:</li> <li>To ensure BOD below 100ppm at final discharge</li> <li>To upgrade from single pass opacity to double pass opacity</li> <li>Reduce GHG emission</li> <li>To capture and remove dust emissions</li> <li>To upgrade existing empty bunch hooper drainage system</li> <li>To monitor smoke emissions from boiler and diesel genset operation</li> </ol>	Complied
4.2 Prin	ciple 2: Transparency		
Criterion	4.2.1 – Transparency of information and documents relevant to	MSPO requirements	
4.2.1.1	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.	The company has maintained records of request and response, land titles and OSH plans, complaints and grievances records that make available upon request.	Complied
	- Major compliance -		



Criterio	on / Indicator	Assessment Findings	Compliance
		<u>www.bousteadplantations.com.my</u> . Others sustainability practices were also available in the website.	
Criterio	n 4.2.2 - Transparent method of communication and consultation	on	
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders.  - Major compliance -	Boustead Plantations Berhad – Telok Sengat POM has developed Communication Procedure. The scope of the procedure is to handle communication for internal and external stakeholders. The methods of communication such as formally write in, through phone call, discussion or meeting and etc. The communication is achieved through notice board, meeting minutes, trainings and newspapers. Complaint/ Suggestion Form and the Suggestion Box was implemented in the company.	Complied
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> .  - Minor compliance -	Telok Sengat POM has established a Complaint Committee to handle external and internal communication/ complaint in the estate. Fruit Supervisor has been appointed as Secretary of Complaint Committee and Social Officer in mill to handle complaints. Appointment letter dated 2/1/2017 was sighted.	Complied
4.2.2.3	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained.	Stakeholder list was developed in Telok Sengat POM. The list has included government authorities such as DOE, DOSH and BOMBA, contractors and suppliers, local communities and NGOs.	Complied
	- Major compliance -	External stakeholder meeting was carried out on 10/10/2018 with the relevant stakeholders such as government authorities, contractors and suppliers, neighboring plantation and schools' representatives together with Telok Sengat Estate. Meeting	



Criterio	on / Indicator	Assessment Findings	Compliance
		minutes was sighted and no issue was raised to the mill management by the stakeholders.	
Criterio	n 4.2.3 – Traceability		
4.2.3.1	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability.  - Major compliance -	<ol> <li>The list of permit and license required for the operations of the mill was sighted. The sample of permit and license:</li> <li>DOE License: 002340, expired 30/6/19</li> <li>Suruhanjaya Tenaga: Lesen Pepasangan Persendirian-2019/01620, expiry 19/5/19</li> <li>FMA (CF permit): all still valid (JH PMA 6811, JH PMD 382, PMT135944, PMT135943, JH PMT 11497, JH PMT 5465)</li> <li>MPOB License: 500089304000, expiry on 31/8/2019</li> <li>Permit barang kawalan berjadual: KPDNKK.J.KTG/PERMIT 0011(PD), Diesel 18,500Ltr expiry on 21/7/2019</li> <li>Permit to purchase, store and use of sodium hydroxide, expiry on 31/12/2018</li> <li>CePSWaM, 811012-01-5461</li> <li>Steam Engineer Grade 1: 099/2007</li> <li>Chargeman A4-1: PJ-T-3-H-2332-2000</li> <li>Authorised Gas Tester: NW-NJHR-AGT-0229-Q</li> <li>JH/14/EIS/02/18 (Dandang Stim Grade 2)</li> <li>JH/14/EIS/02/25 (Dandang Stim Grade 2)</li> <li>JJ266/06 (Dandang Stim Grade 2)</li> </ol>	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system.  - Major compliance -	LORR was established to cover all legal acts, regulations and other requirement related to POM and supply base. The sample of Act and Legal:  1. OSHA 1994	Complied



Criterio	on / Indicator	Assessment Findings	Compliance		
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system.  - Minor compliance -	<ol> <li>FMA 1967</li> <li>Pesticide Act 1974</li> <li>Electrical Supply (Amendment) Act 2015</li> <li>Fire Services Act</li> <li>Environmental Quality Act</li> <li>Local Government Act</li> <li>LORR was established to cover all legal acts, regulations and other requirement related to POM and supply base. The sample of Act and Legal:</li> <li>OSHA 1994</li> </ol>	Complied		
		<ol> <li>FMA 1967</li> <li>Pesticide Act 1974</li> <li>Electrical Supply (Amendment) Act 2015</li> <li>Fire Services Act</li> <li>Environmental Quality Act</li> <li>Local Government Act</li> </ol>			
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.  - Major compliance -	Tracking system available to identify changes in the relevant regulations through head office, sustainability team, website information and the information are communicated from the Head Office (Sustainability Section). Boustead Plantations Berhad have centralised system for tracking any changes in the law and subscribe into Lawnet. The latest communication was done on 9/11/2018 regarding Employment Insurance System Act 2017.	Complied		
4.3 Prince	4.3 Principle 3: Compliance to legal requirements				
Criterio	Criterion 4.3.1 – Regulatory requirements				



Criterio	on / Indicator	Assessment Findings	Compliance
4.3.1.1	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.	The land title was kept by Telok Sengat Estate (Grant No:#25899, Lot 1292)	Complied
	- Major compliance -		
4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirements register.	The land title was kept by Telok Sengat Estate.	Complied
	- Major compliance -		
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.	The land title was kept by Telok Sengat Estate.	Complied
	- Major compliance -		
4.3.1.4	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.	There was no land dispute in the Telok Sengat Certification Unit at the time of audit.	Complied
	- Minor compliance -		
Criterior	1 4.3.2 – Lands use rights		
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.	the land title was kept by Telok Sengat Estate	Complied
	- Major compliance -		
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land.	the land title was kept by Telok Sengat Estate	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	- Major compliance -		
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.	Mill boundary was clearly demarcated and maintained using fencing.	Complied
	- Major compliance -		
4.3.2.4	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC).	There is no land dispute in the Telok Sengat Certification Unit at the time of audit. The lands are leased from CIMB Trustee Berhad via verified with the land titles. There was no encroachment of land by the Telok Sengat Certification Unit.	Complied
	- Minor compliance -		
Criterio	n 4.3.3 – Customary rights		
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.  - Major compliance -	The estate lands are legally owned and leased by the company. The existing estates are not encumbered by any customary land rights. The company has constructed trenches, wooden pegs and painted the palms to differentiate the land boundaries. No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit.	Complied
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available.  - Minor compliance -	The estate lands are legally owned and leased by the company. The existing estates are not encumbered by any customary land rights. The company has constructed trenches, wooden pegs and painted the palms to differentiate the land boundaries. No issues related to loss of legal customary rights with indigenous peoples, local	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		communities and other stakeholders reported during the time of audit.	
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available.  - Major compliance -	The estate lands are legally owned and leased by the company. The existing estates are not encumbered by any customary land rights. The company has constructed trenches, wooden pegs and painted the palms to differentiate the land boundaries. No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit.	Complied
4.4 Prin	ciple 4: Social responsibility, health, safety and employn	nent condition	
Criterio	n 4.4.1: Social Impact Assessment (SIA)		
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones.  - Minor compliance -	Social Impact Assessment was carried out on 2-10/4/2018 by MEC Consultant that involved the participation of relevant stakeholders. Preliminary of SIA findings was sighted. However, the official assessment report has yet to be obtained. Thus, Minor NC was raised.	Minor Noncompliance
		Action plan for mitigate the negative impacts and promoting of positive impacts was developed in the mill based on the preliminary findings from the SIA consultant. The plan has included the issues and action to be taken into the plan.	
Criterion 4.4.2: Complaints and grievances			



Criterio	on / Indicator	Assessment Findings	Compliance
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented.  - Major compliance -	Telok Sengat POM has established a Complaint Committee to handle any complaints from internal and external stakeholders. Besides, a flow chart for handling complaint/ suggestion was developed to outline the process of handling complaint.	Complied
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties.  - Major compliance -	Complaint/ Suggestion Form was established and implemented in the mill to record any complaints from the stakeholders. Besides, Complaint Form for Housing Repair also implemented in the mill. The mill management has taken action to rectify the complaints and updated the actions taken in the form and Complaint Report Book. The complainant has acknowledged on the complaint form after the issue has been resolved by the management.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints.  - Minor compliance -	Complaint/ Suggestion Form was implemented and the empty form was available in the AP Post and Secretary of the Complaint Committee in Telok Sengat POM. Interviewed with the stakeholders confirmed that they are understood about the complaint procedure.	Complied
4.4.2.4	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time.	Interviewed with the stakeholders confirmed that they are understood about the complaint procedure.	Complied
	- Minor compliance -		
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.	The company has implemented the system since July 2017. Therefore, records of complaint were since August 2017. Evidence of action taken such as Request for Works Order was sighted to	Complied
	- Major compliance -	request the contractor to carry out repair work.	



Criterio	on / Indicator	Assessment Findings	Compliance
Criterio	n 4.4.3: Commitment to contribute to local sustainable developr	nent	
4.4.3.1	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.  - Minor compliance -	The mill management has allocated RM 63/ month allowance for the workers' children who are studying secondary school. Besides, the management has provided the opportunity for the university students to have the field trip to the mill and explained to the students on the mill process. The mill management has organized activities with the workers such as family day, Indian temple prayers, health check and bowling competition. All the activities organized was sighted with the photo evident.	Complied
Criterio	n 4.4.4: Employees safety and health		
4.4.4.1	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.  - Major compliance -	Telok Sengat certification unit has established Safety and Health Policy, dated 1/6/2012 signed by Group Managing Director. Safety programme schedule for 2018 was established. The programme comprises of emergency response plan (ERP), OSH management system, risk management, safety committee activities, medical surveillance, audiometric test, exposure monitoring.	Major Noncompliance
		1. CHRA was conducted on 7/5/2018 by Safety Solutions PLT (HQ/04/ASS/00/203).	
		2. Medical surveillance was done on 20/8/2018 by Klinik Rafeeq & Nurul, however the report yet to be received.	
		3. Chemical Exposure Monitoring was done on 26/7/18 by PAC Testing & Consulting Sdn Bhd (HQ/17/JHI/00/2). Result shown	



Criterio	n / Indicator	Assessment Findings	Compliance
		that the personal exposure were below their respension maximum exposure limit.	
		Audiometric Test was done on November 2017 by Medicare Services Sdn Bhd (HQ/08/DOC/00/632). 75 wo was tested. Based on the report, 30 workers were f hearing impairment and need to be tested 22/11/18.	rkers
		Local exhaust ventilation was done on 26/7/2018 by Hyr Tech II (PAC Testing & Consulting Sdn Bhd). However, was no monitoring by employer to conduct inspection appropriate intervals, each interval being no longer the month.	there at an
		hus, Major NC was raised.	
4.4.4.2	The occupational safety and health plan should cover the following:  a) A safety and health policy, which is communicated and implemented.	Communication on safety and health policy was conducte according to the workforce on 2/6/2018. Through intervie with workers, they were understand on issue related to C and MSPO.	w Complied
	<ul> <li>b) The risk of all operations shall be assessed and documented.</li> <li>c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: <ul> <li>i. All employees involved are adequately trained on safe</li> </ul> </li> </ul>	SOP for HIRARC was established. Last reviewed for the HIRARC was done on 2/8/18 to include EFB Hopper, workshop, chemical store, WTP station, Kernel Plant, Con Space, Boiler house, Ramp, Pressing Station, Clarification Station, Sterilizer Station and biogass.	
	working practices;  ii. All precautions attached to products should be properly observed and applied;  d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as	A formal training programme on all aspects of OSH and N was established and implemented. Training for various categories of operators, including all field and office staff, regards to individual duties and training needs had been reviewed and found to be complied. The records of training needs had been reviewed and found to be complied.	with



Criterion /	Indicator			,	Assessment Finding	ıs		Compliance
	identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).			ere available at ecked:	mill and estate office. S	Sample training		
e)	The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling			Date	Training	Remark		
	and storage in accordance to Occupational Safety Health			9/8/18	Noise exposure	TSPOM		
	(Classification Packaging and Labeling) Regulation 1997			5/6/18	PPE			
	Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.			2/6/18	Chemical handling			
f)	The management shall appoint responsible person(s) for			9/8/18	Noise exposure			
	workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations			19/6/18	Operation/Safety			
	and collective agreements.	d)			ilizer station, press stati			
g)	The management shall conduct regular two-way communication with their employees where issues that affect their business			ition, adequate ovided.	e and appropriate protec	tive equipment	equipment was	
	such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded.	e)	Act	t 1974 requirin der lock and k	nit comply with Regulation of balance of remaining ey. During visit it was no cals were kept in the sto	solution to be loted that all the	kept e	
h)	Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.			•	ly with regulation.			
i)	Employees trained in First Aid shall be present at all mill	f)			persons were the Mill Ma espective operating unit		Assistant	
	operations. First Aid equipment should be available at each worksite.	g)	JKI	KP meeting me	embers consist of emplo	yer & employee		
j)	Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.		res	sponsible perso	Records of regular meet on and workers were ma Refer OHS meeting minu	intained. There	e was	
- M	lajor compliance -		TS	POM – dated 2	20/8/18. All the agenda g OHS meeting, eg: acc	was discussed	ing at	



Criterio	on / Indicator		Assessment Findings	Compliance
			workplace inspection, safety improvement plan, issues from workers, training, complaints has been discussed and action to be taken.	
		h)	Accident and emergency procedure was established to include emergency evacuation, fire situation, chemical spillage, accident at work place. Fire drill was last conducted on 6/8/18	
		i)	First aid equipment available at worksites. First aider's competency certificate available. The training was conducted by PBSM Kota Tinggi, Johor. Cert No: RK0142706, RK0142725, RK0142718.	
			Estate/Mill First Aid Box Station (Site Visit) TSPOM Boiler, Office, Workshop	
		rep bee ava	cords of incident and accident were available, using internal orting system. Records on Lost Time Incident (LTI) metrics had en verified to be satisfactory. Accident report on 23/7/18 was silable. The JKKP 6 was submit to DOSH on 27/7/18. JKKP for 1.7 was submit to DOSH on 10/1/2018.	
Criterio	n 4.4.5: Employment conditions			
4.4.5.1	The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy	dat	ustead Plantations Berhad has developed Human Rights Policy ed 11/1/2016 signed by Senior General Manager. The company committed to ensure every individual are treated with fairness,	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	shall be signed by the top management and communicated to the employees.  - Major compliance -	dignity and respect. The company will respect the rights of every individual. They also recognize their responsibilities to respect human rights and avoid complicity in human rights abuses. Training of the policy was conducted on 7/6/2018 to the FFB suppliers and 2/6/2018 to the workers. Seen the training attendance list where all the workers from different stations were participated in the training, photo evident and meeting minutes. Besides, the policy was publicly displayed at the notice board outside the office.	
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.  - Major compliance -	Boustead Plantations Berhad has established Equal Opportunities Policy dated 11/1/2011 signed by Senior General Manager. The company will ensure all the relevant parties will be treated equally and no discrimination based on race, caste, nationalities, religion, gender, age and etc. Interviewed with the workers from different nationalities, gender and age confirmed that no discrimination was occurred in the mill.	Complied
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.  - Major compliance -	There were employment contracts for staff and workers. Pay and conditions are documented and are above the Minimum Wage Order 2016. Sampled of employment contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. The daily rate of RM 38.46 for the workers was stated in the contract according to Minimum Wage Order 2016. Sampled of the payslips confirmed that the workers were paid in accordance with Minimum Wage Order 2016 in the mill.  a. Employee No.: 0705B  b. Employee No.: 0717I  c. Employee No.: 0718H d. Employee No.: 0740T	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.  - Minor compliance -	There was contractor available in the mill for work such as grass cutting. The grass cutting was carried out by the contractor himself without employed any workers. Therefore, there was no issue on the wages of employees of contractors.	Complied
4.4.5.5	The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.  - Major compliance -	The mill management has maintained a profile of each worker together with the employment contract where personal details such as name, gender, date of birth, job description, date entry and wages was stated in the contract. Sampled of the profile as below:  a. Employee No.: 0705B b. Employee No.: 0717I c. Employee No.: 0718H d. Employee No.: 0740T	Complied
4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.  - Major compliance -	All the workers in the mill have signed on an employment contract where it has clearly outline the wages, overtime rate, public holiday entitlement, rest day, working hour and break time in the contract. Sampled of the signed employment contracts as below:  a. Employee No.: 0705B b. Employee No.: 0717I c. Employee No.: 0718H d. Employee No.: 0740T e. Employee No.: 0753C f. Employee No.: 0752F	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.  - Major compliance -	The mill management has implemented Punch Card system to record the working hours and overtimes carried out by the workers. Sampled of the punch card for November 2017, July 2018 and October 2018.	Complied
4.4.5.8	The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.  - Major compliance -	The working hours and break time has clearly stated in the employment contracts signed by the workers prior to work. The working hours for Shift 1 is from 8 a.m. to 4 p.m. and Shift 2 is from 4 p.m. to 12 a.m. The break time for lunch is 45 minutes and tea break is 15 minutes.	Complied
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.  - Major compliance -	Sampled of the payslips for November 2017, July 2018 and October 2018 confirmed that the workers have achieved Minimum Wage Order 2016 and overtimes have paid according to the Employment Act 1955 as below:	Complied
		a. Employee No.: 0705B b. Employee No.: 0717I c. Employee No.: 0718H d. Employee No.: 0740T	
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings.	The management provided free medical facilities to all the workers and dependents. Subsidized of water and electricity supply to all the workers. Besides, the company has constructed new housing to the staffs.	Complied
	- Minor compliance -		



Criterio	n / Indicator	Assessment Findings	Compliance
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.  - Major compliance -	During site visit to the linesite found that playground, football field, mosque and temple were available and free access to all the workers and dependents. Sundry shop was available at Telok Sengat Estate which is inside the living quarters for mill.	Complied
4.4.5.12	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.  - Major compliance -	Boustead Plantations Berhad has developed a Sexual Harassment Policy signed by Senior General Manager, En. Shoib Abdullah dated 11/1/2011. The company will ensure the comfort and security of every employee, clients, business partners and public that involved in the plantations' activities. The policy has clearly stated the types of sexual harassment such as verbal, visual, psychology, physical and etc. Training of the policy was conducted on 7/6/2018 to the FFB suppliers and 2/6/2018 to the workers. Seen the training attendance list where all the workers from different stations were participated in the training, photo evident and meeting minutes. Besides, the policy was publicly displayed at the notice board outside the office.	Complied
		complaint procedure for Gender Committee to report the sexual harassment and violence issue. Last meeting was conducted on 9/7/2018 and meeting minutes was sighted. The committee has suggested to carry out gotong-royong in the school area.	
4.4.5.13	The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective	Boustead Plantations Berhad has developed Freedom of Association Policy dated 11/11/2011 signed by Senior General Manager, En. Shoib Abdullah. The company is committed and allowed their stakeholders such as employees, clients, business partner and etc	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
	bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.	to form or join any association. There were total 41 workers who have joined NUPW as date October 2018.	
	- Major compliance -	Last meeting between the NUPW representative was conducted on 8/10/2018. Meeting minutes was sighted and issues were recorded in the meeting minutes.	
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.  - Major compliance -	Boustead Plantations Berhad has developed Employment of Child and Age Limit Policy dated 11/1/2011. The company will comply with the Children and Young Persons (Employment) Act 1966 and ILO Convention 138 (1973) Article 1-3. No workers less than 16 years old will be recruited and less than 18 years old for hazardous work. Document verified on the Employee Master List confirmed that all the workers employed were above 18 years old.	Complied
Criterior	4.4.6: Training and competency		
4.4.6.1	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.  - Major compliance -	A formal training programme on all aspects of MSPO was established and implemented. Training for various categories of operators, including all field and office staff, with regards to individual duties and training needs was reviewed and found to be complied.	Complied
		Training programme planned for year 2018 was consistently implemented. The programme includes training for all categories of	



Criterio	n / Indicator		Assessment Fin	dings		Compliance
			workers. Evidence of adequate and appropriate training on safe working practices provided to:			
		- workers exp	osed to machinery and hig	h noise levels,		
		- workers wor	king in confined space and	l etc		
		The records of training were available at mill and estate office. Sample training checked:				
		Date Training Remark				
		9/8/18	Noise exposure	TSPOM		
		5/6/18	PPE			
		2/6/18	Chemical handling	1		
		9/8/18	Noise exposure	1		
		19/6/18	Operation/Safety			
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.  - Major compliance -	Criteria was categories of	ing programme on all aspe established and implemen operators, including all f dividual duties and training omplied.	nted. Training for ield and office stat	various ff, with	Complied
			gramme planned for yea The programme includes t			



Criterio	on / Indicator	Assessment Findings	Compliance
		workers. Evidence of adequate and appropriate training on safe working practices provided to:	
		- workers exposed to machinery and high noise levels,	
		- workers working in confined space	
4.4.6.3	A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure.  - Minor compliance -	A formal training programme on all aspects of MSPO Principles and Criteria was established and implemented. Training for various categories of operators, including all field and office staff, with regards to individual duties and training needs was reviewed and found to be complied.	Complied
		Training programme planned for year 2018 was consistently implemented. The programme includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to:	
		- workers exposed to machinery and high noise levels,	
		- workers working in confined space and etc	
4.5 Prin	ciple 5: Environment, natural resources, biodiversity and	d ecosystem services	
Criterio	n 4.5.1: Environmental Management Plan		
4.5.1.1	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.	The management had established the environmental management programme for the year 2018. The plan was as follow:  1. To ensure BOD below 100ppm at final discharge  2. To upgrade from single pass opacity to double pass opacity  3. Reduce GHG emission	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	- Major compliance -	<ul><li>4. To capture and remove dust emissions</li><li>5. To upgrade existing empty bunch hooper drainage system</li><li>6. To monitor smoke emissions from boiler and diesel genset operation</li></ul>	
4.5.1.2	The environmental management plan shall cover the following:  a) An environmental policy and objectives;  b) The aspects and impacts analysis of all operations  - Major compliance -	The environmental management plan covered in the established action plan of significant environmental aspects identified and impacts evaluated as per documents sighted as following:  - Environmental Aspect and Impact Identification 2018; Serial # EAI/2018/001-1 to EAI/2018/013-1 dated 30/8/18  - Environmental Impact Evaluation Form Serial # EIE/2018/01-1 to EIE/2018/014-1 dated 30/8/18  The estate implemented the relevant management plan for their existing planting which covered all field and facilities operational activities including operation of field upkeeps, machinery repair workshop, spraying and harvesting.	Complied
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.  - Major compliance -	The developed environmental improvement plan to mitigate the negative impacts and to promote the positive ones were effectively implemented and monitored.	Complied
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan.  - Minor compliance -	Few environmental plan was established (environmental management plan and waste management plan). The plan was as follow:  1. To ensure BOD below 100ppm at final discharge  2. To upgrade from single pass opacity to double pass opacity  3. Reduce GHG emission  4. To capture and remove dust emissions  5. To upgrade existing empty bunch hooper drainage system	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		6. To monitor smoke emissions from boiler and diesel genset operation	
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives.  - Major compliance -	The above programs were regularly communicated by estate management to all employees from time to time during routine workers assembly. The recent specific biodiversity and environmental policy briefing was conducted on 20/8/18 which was attended by all estate staff and employees	Complied
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.	Specific Environmental Aspects & Impacts reviews were conducted quarterly. The latest meeting was conducted on 20/8/2018.	Complied
	- Major compliance -		
Criterio	<b>1 4.5.2:</b> Efficiency of energy use and use of renewable energy		
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period  - Major compliance -	A plan for improving efficiency of the use of fossil fuels was established to include Mill and estate quarters, office, meeting room, weighbridge, laboratory and mill operation, fuel consumption at estate Diesel use per mt FFB was monitored every month. The Plan for Improving Fossil Fuel and Palm GHG FY 2018 includes the following:  - To minimize and limit electrical usage - Replace bulb with an energy saving bulb last 10 times longer with 75% less energy - Switch off or unplug any charges or appliances not in use - To put in hibernate of sleep mode for all pc not in use	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
		There was a plan established for improving efficiency of the use of fossil fuel. Sighted the mill diesel use. Diesel consumption/FFB processed: 1.59 l/mt (Jan - Oct 2018).	
4.5.2.2	The oil palm premises shall estimate the direct usage of non- renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.	The mill was established estimation on total energy required. This estimation was compared to the actual usage by monthly and reported to the head office for monitoring.	Complied
	- Major compliance -		
4.5.2.3	The use of renewable energy should be applied where possible.  - Minor compliance -	There uses mesocarp fibres as its main source of energy as the steam boiler fuel. Steam turbine was fully in operation when the process runs.	Complied
Criterion	4.5.3: Waste management and disposal		
4.5.3.1	All waste products and sources of pollution shall be identified and documented.  - Major compliance -	All waste products and sources of pollution was identified in Waste Management Action Plan Year 2018 for the mill. Based on the Waste Management Action Plan Year 2017 the following wastes and its sources were identified:	Complied
		<ul> <li>Domestic waste: Rubbish from linesite, office and etc.</li> <li>Industrial waste: POME, EFB, scrap metal, compost, reused empty container, used tyres &amp; tubes</li> <li>Scheduled waste: SW305, SW306, SW 410 &amp; SW 102</li> </ul>	
4.5.3.2	A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:	As above, all waste products and sources of pollution was identified in Waste Management Action Plan Year 2018 for the mill. Site visit	Complied



Criterio	on / Indicator	Assessment Findings	Compliance	
	<ul> <li>a) Identifying and monitoring sources of waste and pollution.</li> <li>b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</li> <li>- Major compliance -</li> </ul>	confirmed that the practice of reduce, reuse and recycle of materials was implemented.  Segregation of wastes i.e. general wastes and scheduled wastes were verified to be satisfactory. Proper storage areas were identified for the storage of the recyclable wastes at the mill.		
4.5.3.3	The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005  - Major compliance -	Visit to mill shown the management and disposal plan was implemented accordingly. Records sighted for SW i.e. Inventory of Scheduled Wastes; Ref.: AS(B)J31/152/000/025; Inventory # 0104J52149321102018. 5th schedule was update accordingly as on 13/10/2018. E-consignment dated 12/10/2018 for SW410, SW409, SW305 by Modern Energy Sdn Bhd.  However, the inventory and labelling for SW409 in the scheduled waste store was not updated accordingly. Thus, Major NC was raised.	Major Noncompliance	
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.  - Minor compliance -	The management used to segregate the waste, i.e. general wastes and scheduled wastes was verified to be satisfactory.  Proper storage areas were identified for the storage of the recyclable wastes.	Complied	
Criterio	n 4.5.4: Reduction of pollution and emission			
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.	Based on the assessment done by the mill of all polluting activities as of the Environment Aspect and Impact assessment, identified	Complied	



Criterio	on / Indicator	Assessment Findings	Compliance	
	- Major compliance -	sources were boiler chimney, POME treatment & diesel as the main GHG pollutants.		
		Current monitoring for emissions was through online boiler smoke density and alarm and quarterly boiler stack monitoring of dust particulate. Other environmental assessment carried out as per Action Plan for Environmental Assessment 2018 established. Sampled boiler stack emission monitoring sighted was carried out on 12 August 2018 by Spectrum Laboratories (Johore) Sdn Bhd. Verified draft report, Ref# ETD/TSPOM/SE/2018/08/18160. The average dust emission result, 62.33 g/Nm3 , dry @ 12 % CO2.		
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented.  - Major compliance -	Significant pollutants identified were SW generated, POME discharge and boiler stack emissions. These pollutants impact to GHG were monitored as per established plan.	Complied	
	- Major compliance -	Monitoring of POME discharge conducted on monthly basis through sample analysis by external lab. Sighted sample Certificate of Analysis; Cert. # MAP1353/18; Sample date: 23/10/2018; Report date: 30/10/2018; Sample mark: 2695- Final discharge (POME), 2693 (upstream), 2694 (downstream). Analysis done by Felda Palm Industries Sdn Bhd, Makmal Analisa Bukit Besar shown all results found within the limits as per DOE compliance schedule.		
		Current monitoring for emissions was through online boiler smoke density and alarm and quarterly boiler stack monitoring of dust particulate. Other environmental assessment carried out as per		



Criterio	n / Indicator	Assessment Findings	Compliance	
		Action Plan for Environmental Assessment 2018 established. Sampled boiler stack emission monitoring sighted was carried out on 12 August 2018 by Spectrum Laboratories (Johore) Sdn Bhd. Verified draft report, Ref# ETD/TSPOM/SE/2018/08/18160. The average dust emission result, 62.33 g/Nm3 , dry @ 12 % CO2.		
		Visit to mill shown the management and disposal plan was implemented accordingly. Records sighted for SW i.e. Inventory of Scheduled Wastes; Ref.: AS(B)J31/152/000/025; Inventory # 0104J52149321102018. 5 <sup>th</sup> schedule was update accordingly as on 13/10/2018. E-consignment dated 12/10/2018 for SW410, SW409, SW305 by Modern Energy Sdn Bhd.		
4.5.4.3	Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.  - Major compliance -	Monitoring of POME discharge conducted on monthly basis through sample analysis by external lab. Sighted sample Certificate of Analysis; Cert. # MAP1353/18; Sample date: 23/10/2018; Report date: 30/10/2018; Sample mark: 2695- Final discharge (POME), 2693 (upstream), 2694 (downstream). Analysis done by Felda Palm Industries Sdn Bhd, Makmal Analisa Bukit Besar shown all results found within the limits as per DOE compliance schedule.	Complied	
Criterior	4.5.5: Natural water resources			
4.5.5.1	The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:  a) Assessment of water usage and sources.	Documented Water Management Plan Year 2017 inclusive of location; wastewaters produced; treatment/containment method; reuse/recycle/disposal method was sighted. The plan implemented as per following:  - Identification of water sources	Complied	



Criterion / Indicator	Assessment Findings	Compliance
<ul> <li>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.</li> <li>c) Ways to optimize water and nutrient usage and reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</li> <li>- Major compliance -</li> </ul>	<ul> <li>Efficient use of water</li> <li>Renewability of water sources</li> <li>Riparian buffer zone</li> <li>Areas where buffer zone not established</li> <li>Water quality monitoring</li> <li>Effluent analysis</li> <li>Demarcation of wetlands areas</li> <li>Soil and water conservation measures</li> <li>No construction of bunds/weirs/dam across main rivers</li> </ul>	
	<ul> <li>Sampled implementation in place including the following monitoring were sighted:</li> <li>Monthly water analysis by mill, latest conducted on 7/11/2017; Analysis cert. no.: 20171114/006A-06C by Dynakey Laboratories Sdn Bhd</li> <li>Yearly estate river inlet and outlet analysis; Analysis cert. no.: 20171011-19A-0 - 20B-0); dated: 31/10/2017 at Sipit Division by Dynakey Laboratories Sdn Bhd</li> </ul>	
	Protection of water courses and wetlands implemented as per established policy of slope and river buffer protection policy (Refer <i>Polisi Zon Perlindungan Cerun dan Zon Penampan Sungai</i> ); dated 12/1/2015. Protection program includes monitoring of river water quality as per sample Certificate of Analysis; Cert. # 20171114-06-0; Sample date: 7/11/2017; Report date: 20/11/2017; Sample mark: A. Upstream; B. Downstream; C. Final discharge (POME). All results found within the limit as per DOE compliance schedule.	



Criterio	on / Indicator	Assessment Findings	Compliance
4.5.5.2	Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.  - Major compliance -	No open discharge of POME into water course was practiced. This was based on the field visit which found piping installation of sprinkler applications which were verified with the documents sighted as following:  • DOE Licence: JPKKS/12/003471 (validity period 1/7/2017 - 30/6/2018) for 30 MT/hr and method of POME discharge is land irrigation with BOD final discharge limit <50mg/l  • Discharge from Final Discharge Pit; Plan # SJ/701/14/01-02	
4.6 Prin	ciple 6: Best Practices	Proposed Dewatering Press Site; Plan # GE/SP/ETP/182 Proposed Sprinkler Application Site	
Criterio	n 4.6.1: Mill Management		
4.6.1.1 Standard operating procedures shall be appropriately documented and consistently implemented and monitored.  - Major compliance -		Quality Assurance Manual (QAM, Rev:01, Date:2/11/09), Mill operation Manual (MOM, Issue 2, Date: June 2002) and Standard Operating Procedure for SPOM was established to cover all the station. Sighted some of the procedure related to loading ramp, sterilization station, threshing and press station, clarification station, kernel station, depericarper station, kernel station, effluent treatment plant, boiler house, power house, water treatment plant and etc.	Complied
		Work Instructions were derived from SOPs and it were displayed at work stations at the mill and at certain locations at the estates, such	



Criterion / Indicator		Assessment Findings	Compliance			
		as the Muster Notice Boards. Eg: WI Boiler Station, WI Sterilizer Station, WI Oil Room, WI Press Station and etc.				
4.6.1.2	All palm oil mills shall implement best practices.  - Major compliance -	The implementation in the TSPOM was consistent with the Quality Assurance Manual and Work Instruction. Sighted Internal Audit report which was conducted once a year by Sustainability section, the 1 <sup>st</sup> internal audit was conducted on 08-18/10/2018 to cover the entire criterion stated in the standard and SOP.  Visiting Engineering Visit for Telok Sengat POM was conducted on 23-25/7/2018 by Deputy Group Engineer, Group Engineering Department. The report dated 07/2018 was sighted.	Complied			
Criterion	4.6.2: Economic and financial viability plan					
A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.  - Major compliance -		TSPOM and supply base was established and implemented its commitment to long term sustainability and improvements through a capital expenditure programme eg: Capital expenditures, vehicle and heavy plant running schedule, OER, KER and etc. Budget 2018 and 5 years planning horizon (projections 2019- 2023) was verified during the audit.  Telok Sengat POM was made progress towards achieving their performance production targets for the current financial year.	Complied			
Criterion 4.6.3: Transparent and fair price dealing						



Assessment Findings		
mpany: Lian Kin Tractor Works for backhoe works which id from 1/1/2018 to 31/12/2018. mo of Agreement No.: 002/2018 for grass cutting works ich valid from 1/1/2018 to 31/12/2018.	Complied	
orters' agreements were found expired as below: mpany No.: 16810-V for transporting CPO which valid m 12/5/2014 for 1-year contract. mpany No.: 21873-W for transporting CPO which valid m 12/10/2011 for 1-year contract.  r NC was raised.  r and payment voucher was sighted for the payment e contractors as below:  ork Order# 325/2018 dated 5/10/2018 for grass cutting October 2018 and payment was made on 1/11/2018 th payment voucher# TSM 451/2018.  ork Order# 326/2018 dated 5/10/2018 for grass cutting October 2018 and payment was made on 1/11/2018 th payment voucher# TSM 452/2018.	Major Noncompliance	
h pa ork ( Oct	ayment voucher# TSM 451/2018.  Order# 326/2018 dated 5/10/2018 for grass cutting tober 2018 and payment was made on 1/11/2018	



Criterio	on / Indicator	Assessment Findings	Compliance
4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.	The contractors have been briefed on the MSPO requirements during the stakeholder meetings on 7/6/2018.	Complied
	- Major compliance -		
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor.  - Major compliance -	The contractors have signed on the contract agreement prior to provide services. Seen the contract agreement and details as refer to Criterion 4.6.3.1.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.  - Minor compliance -	Boustead Plantations Berhad has agreed for BSI auditors to verify the assessment through a physical inspection if required.	Complied



#### **Section 4: Assessment Conclusion and Recommendation**

#### **Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings**

Based on the findings during the assessment Telok Sengat Palm Oil Mill Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of Telok Sengat Palm Oil Mill Certification Unit is approved.

Acknowledgement of Assessment Findings	Report Prepared by
Name:	Name:
Anuar bin Semail	Mohd Hafiz Mat Hussain
Company name:	Company name:
Boustead Plantations Berhad	BSI Services Malaysia Sdn. Bhd.
Title:	Title:
Planting Director	Client Manager
Signature:	Signature:
	Howe
Date: 27/3/2019	Date: 23/3/2019



#### **Appendix A: Assessment Plan**

Date	Time		Subjects	(MH)	(HNS)
Sunday 18/11/2018	15:00 21:00	-	Travel to Johor	√	√
Monday, 19/11/2018	08:30 09:00	-	<ul> <li>Opening Meeting (Telok Sengat Estate)</li> <li>Presentation by Sime Darby Team</li> <li>Presentation by BSI Lead Auditor -introduction of team member and assessment agenda</li> <li>Confirmation of assessment scope and finalizing audit scope</li> </ul>	√	√
Sengat Estate	09:00 11:00	-	<b>Telok Sengat Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc	√	√
	10:30- 12:30		<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc.)		√
	11:00 12:30	_	Document review (MS:2530 Part 3), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices, P7: Development of New Planting.	√	V
	12:30 13:30	-	Lunch / Break	√	√
	13:30 16:30	-	Continue with Document review and site verification if deemed necessary.	√	√
	16:30 17:00	-	Interim closing meeting	√	√
Tuesday, 20/11/2018	07:30 08:30	-	Travel to Chamek Estate	√	√
Chamek Estate	09:00 11:00	-	Chamek Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc	√	√
	10:30- 12:30		<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc.)		√
	11:00 12:30	_	Document review (MS:2530 Part 3), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices, P7: Development of New Planting.	√	√
	12:30 13:30	_	Lunch / Break	√	√
	13:30 16:30	_	Continue with Document review and site verification if deemed necessary.	√	√



Date	Time		Subjects	(MH)	(HNS)
	16:30 17:00	-	Interim closing meeting	√	√
Wednesday, 21/11/2018	08:00 08:30	_	Travel to Telok Sengat POM	√	√
Telok Sengat POM	08:30- 11:00		<b>Telok Sengat Palm Oil Mill</b> Field Assessment: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	√	V
	10:30- 12:30		<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc.)		√
	11:00 12:30	-	Document Review (MS:2530 Part 4), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices	V	V
	12:30 13:30	-	Lunch / Break	√	√
	13:30 16:30	-	Continue with Document review and site verification if deemed necessary.	√	√
	16:30 17:00	-	Interim closing meeting	√	√
Thursday 22/11/2018	07:30 08:30	-	Travel to Telok Sengat POM	√	√
22,11,2010	08:30- 12:30		<b>Telok Sengat POM</b> Document Review (MS:2530 Part 4), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices	√	√
	12:30 13:30	-	Lunch / Break	√	√
	13:30 15:30	-	<b>Telok Sengat Estate</b> Document review (MS:2530 Part 3), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices, P7: Development of New Planting	√	√
	15:30 16:30	-	Preparation for closing meeting	√	√
	16:30 17:30	-	Closing meeting	√	√



#### **Appendix B: List of Stakeholders Contacted**

- 1. Gender Representative
- 2. Workers Representative
- 3. Sprayers
- 4. Harvesters
- 5. Mill Operators
- 6. Contractor
- 7. NUPW Representative (Kluang Region)



#### **Appendix C: Smallholder Member Details**

No	Name of smallholder	Year Planted	Land Area (ha)	Forecast FFB (Mt/ha/year)
1	Not applicable			
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
	TOTAL			



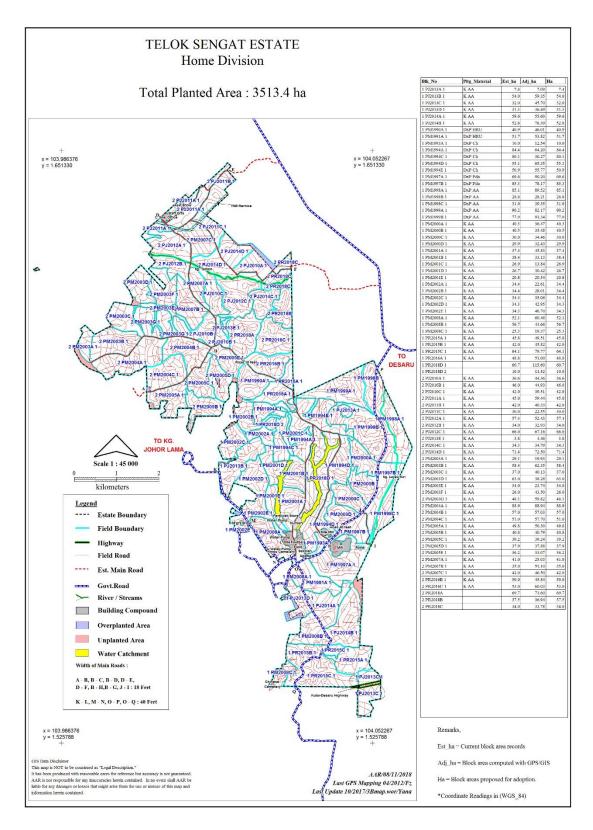


Appendix D: Telok Sengat Palm Oil Mill Location and Field Map



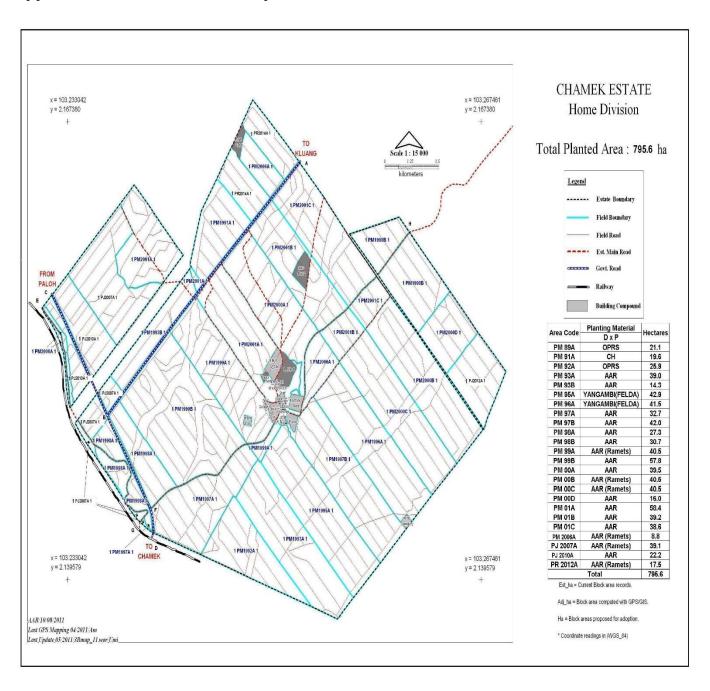


#### Appendix E: Telok Sengat Estate Field Map





#### **Appendix F: Chamek Estate Map**





#### **Appendix G: List of Abbreviations**

BOD Biochemical Oxygen Demand

CB Certification Bodies
CE Chamek Estate

CHRA Chemical Health Risk Assessment

COD Chemical Oxygen Demand

CPO Crude Palm Oil EFB Empty Fruit Bunch

EHS Environmental, Health and Safety
EIA Environmental Impact Assessment
EMS Environmental Management System

FFB Fresh Fruit Bunch

FPIC Free, Prior, Informed and Consent

GAP Good Agricultural Practice

GHG Greenhouse Gas

GMP Good Manufacturing Practice
GPS Global Positioning System
HCV High Conservation Value
IPM Integrated Pest Management

ISCC International Sustainable Carbon Certification

LD50 Lethal Dose for 50 sample
MSPO Malaysian Sustainable Palm Oil
MSDS Material Safety Data Sheet

MT Metric Tonnes
OER Oil Extraction Rate

OSH Occupational Safety and Health

PK Palm Kernel
PKO Palm Kernel Oil
POM Palm Oil Mill

POME Palm Oil Mill Effluent

PPE Personal Protective Equipment

RTE Rare, Threatened or Endangered species
SEIA Social & Environmental Impact Assessment

SIA Social Impact Assessment SOP Standard Operating Procedure

TSE Telok Sengat Estate
TSPOM Telok Sengat Palm Oil Mill