PF824 MSPO Public Summary Report Revision 0 (Aug 2017)

MALAYSIAN SUSTAINABLE PALM OIL ANNUAL SURVEILLANCE ASSESSMENT 3 Public Summary Report

Keresa Plantations Sdn Bhd

Head Office: P.O. Box 2607 97008 Bintulu, Sarawak Malaysia

Keresa Palm Oil Mill, Sujan Estate and Jiba Estate Lot 1, Block 17, Lavang Land District 97000 Bintulu

Sarawak, Malavsia

Report prepared by: Mohamed Hidhir Zainal Abidin (Lead Auditor)

Report Number: 8838710

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 Information and Contact Person				
MPOB License	Keresa POM : 51055700 Sujan Estate & Jiba Estate: 50365610			
Company Name	Keresa Plantations Sdn Bhd/Keresa M	lill Sdn Bhd		
Address	Head office : Level 6, Tun Jugah tower, 18, Jalan Tunku Abdul Rahman 93100 Kuching, Sarawak Certification Unit : Postal address : PO Box 2607 97008 Bintulu, Sarawak, Malaysia Location address : Lot 1, Block 17, Lavang Land District 97000 Bintulu, Sarawak, Malaysia			
Group name if applicable:	Not applicable			
Subsidiary of (if applicable)	Not applicable			
Contact Person Name	Mr Abdul Aziz Bin Zainal Abidin (Deputy General Manager)			
Website	www.keresa.com.my	E-mail	aziz@keresa.com.my	
Telephone	+6086 981105	Facsimile	+6086 981106	

1.2 Certification Information					
Certificate Number	MSPO 644925 (Jiba Est	MSPO 644920 (Keresa POM) MSPO 644925 (Jiba Estate) MSPO 644923 (Sujan Estate)			
Issue Date	11/11/2015	E	xpiry date	10/11/2020	
Scope of Certification	on Keresa POM: Production Sujan Estate and Jiba E				cts
Stage 1 Date		N/A			
Stage 2 / Initial Ass	sessment Visit Date (IAV)	22-25 July 2015			
Continuous Assessr	nent Visit Date (CAV) 1	5-8 December 2016			
Continuous Assessr	nent Visit Date (CAV) 2	7-10 November 2017			
Continuous Assessr	nent Visit Date (CAV) 3	23-25 October 2018			
Continuous Assessr	nent Visit Date (CAV) 4				
Other Certificat	ions				
Certificate Number	Standard(s)		Certificate	Issued by	Expiry Date
EU-ISCC-Cert- DE104-11421401	ISCC		ISCC Gut Cert		03/12/2018
RSPO 559278	RSPO		BSI		20/10/2020

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1.3 Location of Certification Unit							
Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of Longitude	of the site office Latitude				
Keresa Palm Oil Mill (30 mt/hr)	Lot 1, Block 17, Lavang Land District 97000 Bintulu, Sarawak, Malaysia	113° 35′ 59.1″ E	03° 09′ 49.6″ N				
Sujan Estate	Lot 1, Block 17, Lavang Land District 97000 Bintulu, Sarawak, Malaysia	113° 36′ 09.0″ E	03° 10′ 34.3″ N				
Jiba Estate	Lot 1, Block 17, Lavang Land District 97000 Bintulu, Sarawak, Malaysia	113° 33′ 36.4″ E	03° 09′ 10.5″ N				

1.4	Plantings	&	Cvc	le
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P-1-1-			Age (Years) - ha	a			
Estate	0 - 3 4 - 10 11 - 20 21 - 25						
Sujan Estate	0	0	2697.95	380.13	0		
Jiba Estate	0	0	0	2268.82	0		
TOTAL	0	0	2697.95	2648.95	0		

1.5 FFB Production (Actual) and Projected (tonnage)						
Producer Group	Projected (Oct 2017-Sept 2018)Actual production (Oct 2017-Sept 2018)Projected production for next 12 months (Oct 2018 – Sept 2019)					
Sujan Estate	75,600.00	64,159.32	68,000			
Jiba Estate	48,000.00	45,966.99	49,000			
TOTAL	123,600.00	110,126.31	117,000			

1.6 Certified CPO / PK Tonnage					
Mill	Estimated (Previous Year)	Actual (This Year)	Forecast (Next Year)		
	CPO (OER:20 %)	CPO (OER: 20.13 %)	CPO (OER:21 %)		
Karaaa DOM	23, 826	22,168.43	24,570		
Keresa POM	PK (KER:5 %)	PK (KER: 4.16 %)	PK (KER: 5.5%)		
	6,180	4,581.25	6,435		



1.7 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Sujan Estate	2,697.95	0	464.62	3,162.57	86.89
Jiba Estate	2,648.95	0	211.48	2,860.43	91.47
TOTAL	5,346.9	0	676.1	6,023	

1.8 Details of Certification Assessment Scope and Certification Recommendation:

BSI Services Malaysia Sdn Bhd has conducted the annual surveillance Assessment of Keresa Plantation, located in Bintulu comprising of Sujan, Jiba Estate, KEresa POM and infrastructure

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

The onsite assessment was conducted on 22-25 October 2018

Based on the assessment result, Keresa Plantation complies with the MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for oil palm plantations and organized smallholder, MS 2530-4:2013 Part 4: General principles for palm oil mills

and recommended for continued certification.

Section 2: Assessment Process

Certification Body:

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 Nicholas Cheong: <u>Nicholas.Cheong@bsigroup.com</u> www.bsigroup.com

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 23-25 October 2018. The audit programme is included as Appendix A. The approach to the audit was to treat the Keresa POM, Sujan Estate and Jiba estate 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.

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 $N = 1.0\sqrt{y}$ where y 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 $(1.0\sqrt{y}) \times (z)$; where 1.0 is the risk factor (may defers ro 1.2 and 1.4 depending on risk), where y is total number of group members and where z is the multiplier defined by the risk assessment. 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.

All the previous nonconformities are remains closed. The assessment findings for the this 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. The certificated issued to each certification unit (Keresa POM, Sujan Estate and Jiba Estate), however the audit was conducted concurrently (7-10 November 2017).

This report was internally reviewed by Approved BSI Internal Reviewer.

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 4)	Year 5 (ASA 5)
Keresa POM	\checkmark	\checkmark	\checkmark	\checkmark	\checkmark
Sujan Estate	\checkmark	\checkmark	\checkmark	\checkmark	\checkmark
Jiba Estate	\checkmark	\checkmark	\checkmark	\checkmark	\checkmark

Tentative Date of Next Visit: October 23, 2019 - October 25, 2019

Total No. of Mandays: 6

BSI Assessment Team:

<u> Mohamed Hidhir Zainal Abidin – Lead Auditor</u>

He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, 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 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health, environmental and workers and stakeholders consultation.

Daniel Francis – Team Member

Daniel Francis is a fulltime employee with BSI Services Malaysia. He holds a Bachelor of Applied Science Degree in Food Science, graduated from Charles Sturt University, Australia. He has over 8 years of working experience in the oil and gas industry and 3 years in the food & beverage industry. He is an experienced auditor for several management system standards including ISO 9001, ISO 14001, OHSAS 18001 and Integrated Management System. He had completed the ISO 9001:2015 Lead Auditor Course and RSPO SCC Lead Auditor Course. He had been involved in the RSPO audits with various companies in Malaysia. During assessment, he covers the legal issues and occupational safety and health.

Section 3: Assessment Findings

3.1 Details of audit results

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

□ MSPO MS 2530-2:2013 – General Principles for Independent Smallholders
 □ MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders
 □ MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills

3.2 Details of Nonconformities and Opportunity for improvement

The nonconformity is listed below.

During the annual surveillance assessment there were eight (8) Major nonconformities (3 major for Sujan Estate and 3 major for Jiba Estate). The Keresa POM, Sujan Estate and Jiba estate 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				
1700127-201810-M1	Keresa POM	Part 4: 4.4.4.2 (s)			
Requirements:	First Aid equipment should be available at each	worksite.			
Statement of Nonconformity:	The first aid equipment was not effectively inspe	ected and monitored.			
Objective Evidence:	 First Aid Kits are provided at various work sites at the Mill. Verified on site visit location: Workshop and Laboratory. However, the content of first aid kit was inadequate as per the Guidelines on First Aid in the Workplace (2nd Edition) by DOSH. eq. Missing scissors and expired eye lotion. Not according to the Tatacara Kerja Selamat – Peti Kecemasan (1.3) Ubat-ubatan samaada dalam bentuk tablet, kapsul, suntikan termasuk ubat titis telinga dan mata tidak dibenarkan disimpan di dalam peti kecemasan. No evidence of recent inspection (frequency every 2 months) to confirm that it 				
Corrections:	 had been appropriately stocked. Tatacara Kerja Selamat/ SOP for first aid kit was available for estate only. For Mill, new SOP for first aid kit will be established by referring to Factory and Machinery Act Fourth Schedule (Regulation 38(2)(i) approved eye ointment or eye drops can be kept in the first aid kit box. 				

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Corrective Actions:	To replace the missing items, establish the new tatacara kerja selamat and do the inspection.
Assessment Conclusion:	Implemented evidences found to be effective thus the major NC was closed on 15/1/19. Continuous implementation will be further verified in the next assessment.

Major Nonconformities:			
Ref	Area/Process	Clause	
1700127-201810-M2	Sujan Estate	Part 3: 4.5.3.3	
Requirements:	chemicals that are classified under Environmer	management shall establish Standard Operating Procedure for handling of used nicals that are classified under Environment Quality Regulations (Scheduled te) 2005, Environmental Quality Act, 1974 to ensure proper and safe Iling, storage and disposal.	
Statement of Nonconformity:	Waste management and disposal was not impler	nented effectively.	
Objective Evidence:	Bhd as the authorized clinical waste collection ar	e disposal is not according to Guidelines on the Handling and Management of nical Waste in Malaysia 2009. So not according to the Waste Management Procedure in Keresa Plantations Sdn id & Keresa Mill Sdn Bhd – 3.2.3.11 Clinical waste stored to be collected and	
	However, it was noted that the Medical Assistant waste to Bintulu Specialist Hospital for disposal.		
	The disposal is not according to Guidelines on th Clinical Waste in Malaysia 2009.		
	There is no approval from DOE to transport the clinical waste to Bintulu Specialis Hospital.		
Corrections:	To discuss the issue (high transportation cost) with DOE and to extend the storage of clinical waste. So economically, the waste will be collected by contractor in time of 6 months.		
Corrective Actions:	Storage of clinical waste in estate can be extended up to 6 months (DOE did not approved the extension). Collection by contractor now can be done bianually to reduce the transportation cost. Collection will be done by contractor. Keresa will also be looking for VMO for alternative for collection and disposal.		
Assessment Conclusion:	Implemented evidences found to be effective thus the major NC was closed on 15/1/19. Continuous implementation will be further verified in the next assessment.		

Major Nonconformities:			
Ref	Area/Process	Clause	
1700127-201810-M3	Jiba Estate	Part 3: 4.5.3.3	
Requirements:	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.		
Statement of Nonconformity:	Waste management and disposal was not implement	ented effectively.	
Objective Evidence:	Clinical waste from the clinic was disposed through Bintulu Specialist Hospital Sdn Bhd as the authorized clinical waste collection and disposal contractor appointed by the company. Latest disposal was done on 05/09/2018.		
	However, it was noted that the Medical Assistant (MA) transports the clinical waste to Bintulu Specialist Hospital for disposal.		
	The disposal is not according to Guidelines on the Handling and Management of Clinical Waste in Malaysia 2009.		
		so not according to the Waste Management Procedure in Keresa Plantations Sdn d & Keresa Mill Sdn Bhd – 3.2.3.11 Clinical waste stored to be collected and sposed by the registered contractor under DOE.	
	There is no approval from DOE to transport the clinical waste to Bintulu Specialist Hospital.		
Corrections:	To discuss the issue (high transportation cost) with DOE and to extend the storage of clinical waste. So economically, the waste will be collected by contractor in time of 6 months.		
Correction Action Plan:	Storage of clinical waste in estate can be extended up to 6 months. Collection by contractor now can be done bianually to reduce the transportation cost. We will also be looking for VMO for alternative.		
Assessment Conclusion:	Implemented evidences found to be effective thus the major NC was closed on 15/1/19. Continuous implementation will be further verified in the next assessment.		

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Major Nonconformities:			
Ref	Area/Process	Clause	
1700127-201810-M4	Keresa POM	Part 4: 4.3.1.4	
Requirements:	The management should assign a person respons track and update the changes in regulatory require	•	
Statement of Nonconformity:	The person responsible has not effectively moni Labour Ordinance (Cap 67), Section 109 (Paymen		
Objective Evidence:	Salary payment is by cash and paid at mill's office and paid after 7th of the following month. Checked 3 months payment form July – September 2018: i) September 2018: Cash received on 9/10/18, refer to delivery note# 85353 by Guard and Escort Services (S) Sdn Bhd. Payment is made on 9/10/18 with employees acknowledgement in the check roll report GPR74BMW ii) August 2018: Cash received on 12/9/18, refer to delivery note# 75282 by Guard and Escort Services (S) Sdn Bhd. Payment is made on 9/10/18 with employees acknowledgement in the check roll report GPR74BMW iii) July 2018: Cash received on 10/8/18, refer to delivery note# 84126 by Guard and Escort Services (S) Sdn Bhd. Payment is made on 10/8/18 with employees acknowledgement in the check roll report GPR74BMW		
Corrections:	To discuss this issue with management. Late payment due to estate.		
Correction Action Plan:	Mill management will rectify this issue by planning to request separate date for salary payment by not following estate's date		
Assessment Conclusion:	Implemented evidences found to be effective thus the major NC was closed on 15/2/19. Continuous implementation will be further verified in the next assessment.		

Major Nonconformities:			
Ref	Area/Process	Clause	
1700127-201810-M5	Sujan Estate	Part 3: 4.3.1.4	
Requirements:	The management should assign a person respons track and update the changes in regulatory require		
Statement of Nonconformity:	The person responsible has not effectively monitored compliance to the Sarawak Labour Ordinance (Cap 67), Section 109 (Payment of wages).		
Objective Evidence:	Labour Ordinance (Cap 67), Section 109 (Payment of wages). Salary payment is by cash and paid at estate's office and paid after 7th of the following month. Checked 3 months payment form July – September 2018: i) September 2018: Cash received on 9/10/18, refer to delivery note# 85352 by Guard and Escort Services (S) Sdn Bhd. Payment is made on 9/10/18 with employees acknowledgement in the check roll report GPR74BMW ii) August 2018: Cash received on 12/9/18, refer to delivery note# 75282 by Guard and Escort Services (S) Sdn Bhd. Payment is made on 12/10/18 with employees acknowledgement in the check roll report GPR74BMW iii) July 2018: Cash received on 11/8/18, refer to delivery note# 75389 by Guard and Escort Services (S) Sdn Bhd. Payment is made on 11/8/18 with employees acknowledgement in the check roll report GPR74BMW		



Corrections:	 To discuss this issue with JTK. To notify responsible person to consistently monitored date of salary payment and 	
	report the submission progress to management by weekly basis.	
	3. To upgrade system so that PIC in HQ will receive all the data in short time.	
Correction Action Plan:	Estate management will rectify this issue. Salary payment must be done 7 days after closing date. Estate management will monitor/follow-up progress of submission with office clerk/admin.All forms and correction must be submitted to main office on first to second day only. On the year 2019, we will be using new system called Lintramax which will fasten the process of salary payment as the data will be keyed in online and PIC in headquarters will receive the data faster.	
Assessment Conclusion:	Implemented evidences found to be effective thus the major NC was closed on 15/2/19. Continuous implementation will be further verified in the next assessment.	

Major Nonconformities:			
Ref	Area/Process	Clause	
1700127-201810-M6	Jiba Estate	Part 3: 4.3.1.4	
Requirements:	The management should assign a person respons track and update the changes in regulatory require		
Statement of Nonconformity:	The person responsible has not effectively moni Labour Ordinance (Cap 67), Section 109 (Payment	· ·	
Objective Evidence:	Salary payment is by cash and paid at estate's office and paid after 7th of the following month. Checked 3 months payment form July – September 2018: i) September 2018: Cash received on 9/10/18, refer to delivery note# 85352 by Guard and Escort Services (S) Sdn Bhd. Payment is made on 9/10/18 with employees acknowledgement in the check roll report GPR74BMW ii) August 2018: Cash received on 12/9/18, refer to delivery note# 75282 by Guard and Escort Services (S) Sdn Bhd. Payment is made on 12/10/18 with employees acknowledgement in the check roll report GPR74BMW iii) July 2018: Cash received on 11/8/18, refer to delivery note# 75389 by Guard and Escort Services (S) Sdn Bhd. Payment is made on 11/8/18 with employees acknowledgement in the check roll report GPR74BMW		
Corrections:	1. To discuss this issue with JTK.		
	2.To notify responsible person to consistently monitored date of salary payment and report the submission progress to management by weekly basis.3. To upgrade system so that PIC in HQ will receive all the data in short time.		
Correction Action Plan:	Estate management will rectify this issue. Salary payment must be done 7 days after closing date. Estate management will monitor/follow-up progress of submission with office clerk/admin.All forms and correction must be submitted to main office on first to second day only. On the year 2019, we will be using new system called Lintramax which will fasten the process of salary payment as the data will be keyed in online and PIC in headquarters will receive the data faster.		
Assessment Conclusion:	Implemented evidences found to be effective thus the major NC was closed on 15/2/19. Continuous implementation will be further verified in the next assessment.		

Major Nonconformities:			
Ref	Area/Process	Clause	
1700127-201810-M7	Sujan Estate	Part 3: 4.4.5.6	
Requirements:	All employees shall be provided with fair contrac employee and employer. A copy of employment every employee indicated in the employment reco	contract is available for each and	
Statement of Nonconformity:	Contract signed by both employee and employer rated workers	has not included rates for piece	
Objective Evidence:	Details of rates for piece rated worker was not included in the main contract based on the contract sampled: 1. Emp. ID:11883 - Contract 14/07/18 – 14/07/20 2. Emp. ID:10082 - Contract 23/7/18 – 23/07/19 (contract extension) 3. Emp. ID:10176 - Contract 28/12/17 – 28/12/19 4. Emp. ID:11159 - Contract 04/10/17 – 04/10/19 5. Emp. ID:11990 - Contract 25/07/18 – 25/07/20 6. Emp. ID:11883 - Contract 14/07/18 – 14/07/20		
Corrections:	To review and ammend contract agreement.		
Correction Action Plan:	an: New contract agreement was amended. All rates (daily & piece-rate) were attached to the new contract agreement. For the long term action, PIC will review the contract agreement from time to time and update the latest rate for any work in the estate		
Assessment Conclusion:	Implemented evidences found to be effective thus the major NC was closed on 15/1/19. Continuous implementation will be further verified in the next assessment.		

Major Nonconformities:		
Ref	Area/Process	Clause
1700127-201810-M8	Jiba Estate	Part 3: 4.4.5.6
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:	Contract signed by both employee and employer has not included rates for piece rated workers	
Objective Evidence:	Details of rates for piece rated worker was not included in the main contract based on the contract sampled: 1. Emp. ID: 11549 - Contract 12/10/17- 12/10/19 2. Emp. ID: 11457 - Contract 12/08/17 -12/8/19 3. Emp. ID: 10037 – Contract 24/06/17 - 23/06/19	
Corrections:	To review and ammend contract agreement.	
Correction Action Plan:	rrection Action Plan: New contract agreement was amended. All rates (daily & piece-rate) were attached to the new contract agreement. For the long term action, PIC will review the contract agreement from time to time and update the latest rate for any work in the estate	



Assessment	Implemented evidences found to be effective thus the major NC was closed on
Conclusion:	15/1/19. Continuous implementation will be further verified in the next assessment.

	Noteworthy Positive Comments					
1	External stakeholders for the mill and estates shown positive feedbacks towards the company.					
2	Keresa management unit has maintained good relationship with the local community and other stakeholders.					

3.3 Status of Nonconformities Previously Identified and OFI

Finding Reference	1552568-201711-M1	Certificate Reference	MSPO 644920
Certificate Standard	MS2530-2:2013	Clause	4.3.1.1
Category	Major		
Area/Process:	MS 2530-4:2013 Part 3		
Details:	Lack of monitoring for the applic	ation of workers' work	c permit.
Objective evidence:	 The management was not monitored effectively to the issue as follow 1. Late submission of working permit to the Malaysia Imigration (Taufik-B1724449) 2. No follow up for the submission of working permit to the Malaysia Imigration on February 17 for Muhammad Riyanto (B5905702) 		
Cause	Lack of monitoring		
Correction / containment	 To submit the working permit to Malaysia Immigration as soon as the workers start working for the company Estate clerk need to follow up the validity of workers' working permit with HR Department in Kuching monthly Lack of monitoring 		
Corrective action	Management had employed new HR Cadet/Executive to monitor closely application of workers' work permit ASA3 verification: No late submission issue of working permit and all permit has been renewed. Thus, the major NC is remained closed.		
Closed?:	Yes		

Finding Reference	1552568-201711-M2	Certificate Reference	MSPO 644920
Certificate Standard	MS2530-2:2013	Clause	4.3.1.1
Category	Major		
Area/Process:	MS 2530-4:2013 Part 3		
Details:	Lack of monitoring for the application of workers' work permit.		
Objective evidence:	The management was not monitored effectively to the issue as follow 1. Late submission of working permit to the Malaysia Imigration (Ruslan- B616977 and Armas-B5650618)		

Cause	Lack of monitoring
Correction / containment	 To submit the working permit to Malaysia Immigration as soon as the workers start working for the company Estate clerk need to follow up the validity of workers' working permit with HR Department in Kuching monthly Lack of monitoring
Corrective action	Management had employed new HR Cadet/Executive to monitor closely application of workers' work permit ASA3 verification: No late submission issue of working permit and all permit has been renewed. Thus, the major NC is remained closed.
Closed?:	Yes

Finding Reference	1552568-201711-N1	Certificate Reference	MSPO 644920
Certificate Standard	MS2530-2:2013	Clause	4.3.1.4
Category	Minor		
Area/Process:	MS 2530-4:2013 Part 3		
Details:	The management was not effect Sarawak Labour Ordinance (Cap		
Objective evidence:	Salary for Oct 2017 was not paid accordingly as per Sarawak Labour Ordinance (Cap 67), Section 109 (Payment of wages), not later than 7 days.		
Cause	Lack of monitoring		
Correction / containment	To do the monitoring on key-in the workers' piece-rated twice a month (middle and end of the month) so that the admin clerk can process the data quickly.		
Corrective action	ASA3 verification: Salary payment is by cash and payment form July – September September 2018: Cash received 85352 by Guard and Escort Servi 9/10/18 with employees acknow GPR74BMW August 2018: Cash received on 1 by Guard and Escort Services (S) 12/10/18 with employees acknow GPR74BMW July 2018: Cash received on 11/8	2018. on 9/10/18, refer to d ices (S) Sdn Bhd. Payr ledgement in the chec 2/9/18, refer to delive Sdn Bhd. Payment is vledgement in the che	elivery note# nent is made on k roll report ery note# 75282 made on eck roll report



	Guard and Escort Services (S) Sdn Bhd. Payment is made on 11/8/18 with employees acknowledgement in the check roll report GPR74BMW
Closed?:	No
Justification	The corrective action was not effectively addressed the previous minor and upgraded to major NC.

Finding Reference	1552568-201711-N2	Certificate Reference	MSPO 644920
Certificate Standard	MS2530-2:2013	Clause	4.3.1.4
Category	Minor		
Area/Process:	MS 2530-4:2013 Part 3		
Details:	The management was not effect Sarawak Labour Ordinance (Cap		
Objective evidence:	Salary for Oct 2017 was not paid Ordinance (Cap 67), Section 109 days.		
Cause	Lack of monitoring		
Correction / containment	To do the monitoring on key-in the workers' piece-rated twice a month (middle and end of the month) so that the admin clerk can process the data quickly.		
Corrective action			
Closed?:	No		
Justification	The corrective action was not eff and upgraded to major NC.	fectively addressed the	e previous minor

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Finding	1552568-201711-N3	Certificate	MSPO 644920
Reference Certificate Standard	MS2530-2:2013	Reference Clause	4.3.1.4
Category	Minor		
Area/Process:	MS 2530-4:2013 Part 4		
Details:	The management was not effect Sarawak Labour Ordinance (Cap		
Objective evidence:	Salary for Oct 2017 was not paid Ordinance (Cap 67), Section 109 days.		
Cause	Lack of monitoring		
Correction / containment	To do the monitoring on key-in the workers' piece-rated twice a month (middle and end of the month) so that the admin clerk can process the data quickly.		
Corrective action	ASA3 verification: Salary payment is by cash and p payment form July – September September 2018: Cash received 85353 by Guard and Escort Serv 9/10/18 with employees acknow GPR74BMW August 2018: Cash received on 1 by Guard and Escort Services (S) with employees acknowledgeme July 2018: Cash received on 10/8 Guard and Escort Services (S) So with employees acknowledgeme	2018. on 9/10/18, refer to d ices (S) Sdn Bhd. Payr ledgement in the chec 2/9/18, refer to delive Sdn Bhd. Payment is nt in the check roll rep 3/18, refer to delivery In Bhd. Payment is ma	elivery note# ment is made on k roll report ery note# 75282 made on 9/10/18 port GPR74BMW note# 84126 by ade on 10/8/18
Closed?:	No		
Justification	The corrective action was not eff and upgraded to major NC.	ectively addressed the	e previous minor



3.4 Issues Raised by Stakeholders

IS #	Description
1	Issues:
	Workers' Representatives - The representatives highlighted that they are treated equally on use of
	the facilities. Housing provided is in good condition and the payment of salary was according to the
	requirement and so far no workers was complained to them.
	Management Responses:
	The management treats all employees equally with no discrimination. Management will continue to
	treat all workers equally without discrimination.
	Audit Team Findings:
	No complaints were highlighted by foreign workers during interviewed. Site visit to the housing area
	found out that is in good condition at the time of the visit. Verified that the mill has budgeted for
	building of new labour linesite for improvement on the condition of the mill labour line-site.
2	Issues:
	Gender Committee Chairman: No issue of sexual harassment and violence case reported thus far.
	Management Responses:
	Information noted by the management.
	Audit Team Findings:
	Document reviewed of the meeting minutes and interviewed with female workers confirmed that no
	issue on sexual harassment has reported.
3	Issues:
	KSGS Smallholders (Rumah Majang) – They informed that no land encroachment by the
	management. Payment was made according to MPOB daily price. Credit term for the fertilizer
	purchase and business opportunity as sundry shop owner has been provided
	Management Responses:
	The Management will continue support the smallholders whenever required.
	Audit Team Findings:
	No further verification was required
4	Issues:
	Contractor and supplier: Contractor confirm payment is prompt as per agreed contract.
	Management Responses:
	Payment is made as per the agreed terms.
	Audit Team Findings:
	No other issues.
5	Issues:
	MPOB: Good corporation given by the mill and estates. Neighboring "rumah panjang" will be group
	under MPOB SPOC project for MSPO
	Management Responses:
	Will continue to support which ever possible.
	Audit Team Findings:
	No further issue.

3.5 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1211918M1	Major	25/7/2015	Closed out on 17/9/15
1211918M2	Major	25/7/2015	Closed out on 17/9/15

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1211918M3	Major	23/7/2015	Closed out on 17/9/15
1211918M4	Major	23/7/2015	Closed out on 17/9/15
1211918M5	Major	23/7/2015	Closed out on 17/9/15
1211918M6	Major	24/7/2015	Closed out on 17/9/15
1211918M7	Major	24/7/2015	Closed out on 17/9/15
1211918M8	Major	24/7/2015	Closed out on 17/9/15
1415560M1	Major	8/12/2016	Closed out on 7/2/17
1415560M2	Major	8/12/2016	Closed out on 1/2/17
1415560M3	Major	8/12/2016	Closed out on 1/2/17
1415560M4	Major	8/12/2016	Closed out on 1/2/17
1415560M5	Major	8/12/2016	Closed out on 1/2/17
1415560M6	Major	8/12/2016	Closed out on 1/2/17
1552568-201711-M1	Major	10/11/2017	Closed out on 5/1/18
1552568-201711-M2	Major	10/11/2017	Closed out on 5/1/18
1552568-201711-N1	Minor	10/11/2017	Not effectively close. Upgraded to major NC
1552568-201711-N2	Minor	10/11/2017	Not effectively close. Upgraded to major NC
1552568-201711-N3	Minor	10/11/2017	Not effectively close. Upgraded to major NC
1700127-201810-M1	Major	25/10/18	Closed on 15/1/19
1700127-201810-M2	Major	25/10/18	Closed on 15/1/19
1700127-201810-M3	Major	25/10/18	Closed on 15/1/19
1700127-201810-M4	Major	25/10/18	Closed on 15/2/19 with consession approval (1 month)
1700127-201810-M5	Major	25/10/18	Closed on 15/2/19 with consession approval (1 month)
1700127-201810-M6	Major	25/10/18	Closed on 15/2/19 with consession approval (1 month)
1700127-201810-M7	Major	25/10/18	Closed on 15/1/19
1700127-201810-M8	Major	25/10/18	Closed on 15/1/19



3.6 Summary of the findings by Principles and Criteria

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

Criterio	n / Indicator	Assessment Findings	Compliance		
4.1 Princ	4.1 Principle 1: Management commitment & responsibility				
Criterion	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 company has initiated the implementations of MSPO requirements. MSPO Policy has been established and signed by Senior Group General Manager dated April 2015.	Yes		
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	The established policy has emphasized on the commitment to sustainable development and continuous improvement with the objective of improving the milling and estate operation.	Yes		
Criterion	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.	The MSPO Internal Audit Procedure (KERESA/MSPO/QP-10; Rev 1; Effective date: 27/09/2016) was established. The internal audit need to be conducted annual.	Yes		
	- Major compliance -	Annual MSPO internal audit was carried from 04/09/2018 to 07/09/2018. Audit covered both documentation and field operation for the mill and estates. There were 05 Major NCs raised by the Internal Auditors. Audit report was available with the summary of findings for each respective work units.			

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Criterion / 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 (KERESA/MSPO/QP-10; Rev 1; Effective date: 27/09/2016) was established and effectively implemented. The procedure was reviewed by the management to include the competency requirement for MSPO internal auditor.	Yes Yes
	- Major compliance -	The Internal Audit was led by (Lead Auditor) Mr Nofri Bin Zulkefli; (Auditor) Winnie Siman, Alicesa Ramba, Eliza Nojin & Adderly Tie Chung Siong.	
4.1.2.3	Report shall be made available to the management for their review.	Internal audit report dated 07/09/2018 was made available for management review.	Yes
	- Major compliance -		
Criterion	4.1.3 – Management Review		
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for	The Management Review Procedure (First Editions; Version 1.0) dated September 2015 was established.	Yes
	effective implementation of MSPO and decide on any changes, improvement and modification.	MSPO Management Review was carried out on 24/09/2018. Minute Meeting of Management Review MSPO was available. All pertinent	
	- Major compliance -	elements for MSPO implementation has been reviewed and presented to top management.	
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 opportunities of the company.	TQM has worked with estate to review and update the social and environmental aspects and impacts risk registers and to develop improvement plans.	Yes
	- Major compliance -		
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Criterio	n / Indicator	Assessment Findings	Compliance
4.1.4.2	The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption. - Major compliance -	The estate has optimised the use of mechanised operations to reduce pollutions.	Yes
4.1.4.3	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. - Major compliance -	The estate has appointed the assistant manager as in charge person to implement and monitor any new technologies being implemented and training of other personnel's. Currently, the estate has optimized the use of mechanized operations to reduce pollutions. Sighted continuous improvement plan dated January 2018 which was prepared by TQM unit.	Yes
4.2 Princ	iple 2: Transparency		
Criterion 4	1.2.1 – Transparency of information and documents relevant to MSF	PO requirements	
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.	Sujan Estate has maintained records of requests and responses, Land titles/user rights, Safety and health plans, Plans and impact assessments relating to environmental and social impact, Plans for pollution prevention, Records of complaints and grievances, Plans for continuous improvement and make available upon request.	Yes
	- Major compliance -		
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	Sujan Estate holds copies of each of the management documents that are required to be publicly available. Copies of the document such as Plans and impact assessments relating to environmental and social	Yes

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Criterion / Indicator		Assessment Findings	Compliance
	or social outcomes. - Major compliance -	impact, Plans for pollution prevention, records of complaints and grievances were available on request. Keresa policy is to make documents and copies of the document publicly available on request, except those relating to commercial confidentiality.	
Criterion	4.2.2 – Transparent method of communication and consultation		
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	Keresa Plantation Sdn Bhd has established and implement Complaints & Grievances Procedure (Ref. SOC 3.2, Version 1) that define the responsibilities and actions required for receiving, recording and responding to enquiries and requests from internal and external stakeholders. The estate has implemented the "Communication and Consultation Management guidelines" as evidenced by the maintenance of filing systems for recording written requests for assistance and information. Inspection of a sample of records found that requests for information were received only from Government Departments (DOE, DOSH, MPOB) and complaint form from the local communities. Furthermore, worker & smallholder survey has been conducted from time to time for establishing active communication.	Yes
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 -	The TQM Executive (Haliza Amir) has been appointed as Social Management Representative for internal and external stakeholders. The responsibilities have been stated in the appointment letter dated 11/10/18.	Yes
		Interviews with Stakeholders confirmed that Keresa has an open	



Criterio	n / Indicator	Assessment Findings	Compliance
		approach to communication with staff, workers and local communities.	
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 available that include the supplier, contractor, smallholders, external stakeholders plantation, villagers & government agency such as DOSH, MPOB, DOE, Labour department & etc. For internal stakeholder, JCC meeting was used to collect feedback. The action request has been recorded and track by Ms Winnie. Request from government agency was by visit log book such as MPOB, DOE and DOSH. The action has been taken accordingly and recorded. Joint consultative committee (JCC) meeting, internal stakeholder meeting that involve worker representative and chaired by group estate manager, Mr Handrick Lagang. The latest meeting was conducted on 21/3/2018 that involved Jiba and Sujan estate. All issued has been discussed with current action plan has been established.	Yes
Criterion	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).	SOP on the traceability of the FFB has established in ISCC Management System guidelines revision 1. Refer to SOP/ISCC/KPSB/EST 04 dated 25/10/17.	Yes
	- Major compliance -		
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Traceability inspection report carried out on monthly basis. Refer to report dated $19/10/18$ for Sujan Estate (Mapo – $18/10/18$, Semerah – $17/10/18$, Belungai – $2/10/18$). The detail of the record includes daily	Yes



Criterio	n / Indicator	Assessment Findings	Compliance
		despatch quantity and division which show the traceability from field to the POM.	
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system Minor compliance -	Eliza Nojin (TQM Executive) has been assigned to maintain the traceability system. The appointment letter dated 1/1/17 with job responsibility has been clearly defined.	Yes
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained.	Inspection of records confirmed these were updated daily based on daily harvesting summary report. Reprot dated 23/10/18 was sighted.	Yes
	- Major compliance -		
4.3 Princ	iple 3: Compliance to legal requirements		
Criterion	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.	Keresa Plantation has maintained the systems for documentation, checking and assessment of legal compliance with applicable laws and regulations.	Yes
	- Major compliance -	Inspection of records showed that the estates has maintained legal compliance with statutory requirements.	
		Sample of permit and license sighted at Sujan Estate were :	
		i) MPOB license for nursery – registered under Keresa Plantations Sdn Bhd, 516060011000 (valid until 31/10/2019)	
		ii) MPOB license – registered under Keresa Plantations Sdn Bhd, 503656102000 (valid until 28/02/2019)	

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Criterio	n / Indicator	Assessment Findings	Compliance
		iii) Petrol License #A31608 - Bintulu Development Authority (BDA) SPL000005 (valid until 31/12/2018)	
		iv) Diesel/petrol KPDNKK (BTU.P.33/2007(D), BLESS #BL2017066107; Serial #Q007291) valid until 23/11/2018. Quantity (15,000 litres).	
		v) Trading License – The Business, Professions and Trading License Ordinance. (Borang I, Seksyen 5, 23 dan 24(2)) – No. 828476 valid until 14/04/2019.	
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register.	A Legal Compliance procedure has been established (KP 16 Mechanism for ensuring legal compliance dated 15 Mar 2010). All operating units have Legal & Other Requirements Register (LORR) covering all the	Yes
	- Major compliance -	necessary regulatory requirements. TQM sustainability department have reviewed and updated the LORR at both mil and estates on 02/10/2017.	
		All the new legal requirements were include in the legal register accordingly:	
		i) Minimum Wages Order 2016	
		ii) Occupational Safety & Health Act 1994 (Act 514) Regulation & Orders	
		iii) Labour Ordinance (Sarawak CAP.76)	
		iv) Labour Act 1955	
		v) Environmental Quality Act 1974 (Act 127)	



Criterio	n / Indicator	Assessment Findings	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.	Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office.	Yes
	- Major compliance -	On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operations. Tracking system on any changes in the law been well implemented.	
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.	The person responsible has not effectively monitored compliance to the Sarawak Labour Ordinance (Cap 67), Section 109 (Payment of wages). Salary payment is by cash and paid at estate's office and paid after 7th of the following month. Checked 3 months payment form July – September 2018:	Noncompliance
		i) September 2018: Cash received on 9/10/18, refer to delivery note# 85352 by Guard and Escort Services (S) Sdn Bhd. Payment is made on 9/10/18 with employees acknowledgement in the check roll report GPR74BMW	
		ii) August 2018: Cash received on 12/9/18, refer to delivery note# 75282 by Guard and Escort Services (S) Sdn Bhd. Payment is made on 12/10/18 with employees acknowledgement in the check roll report GPR74BMW	
		iii) July 2018: Cash received on 11/8/18, refer to delivery note# 75389 by Guard and Escort Services (S) Sdn Bhd. Payment is made on 11/8/18 with employees acknowledgement in the check roll report GPR74BMW	
		Previous NC was not effectively close thus upgraded to major NC.	

Criterion 4.3.2 – Lands use rights



Criterio	n / Indicator	Assessment Findings	Compliance
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 -	Keresa Estate operation is on lease land. There are documents in place showing legal ownership or lease and a history of land tenure. As reported during the last assessment, estate was developed on State Lease Land, issued by Department of Land and Survey; Bintulu Division dated 28 December 1996 for 99 years (between 01 January 1981 and 01 January 2080) over an area of 6,023 ha in Lot No. 1 Block 17 Lavang Land District, Bintulu Sarawak.	Yes
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 -	Keresa Estate operation is on lease land. There are documents in place showing legal ownership or lease and a history of land tenure. As reported during the last assessment, estate was developed on State Lease Land, issued by Department of Land and Survey; Bintulu Division dated 28 December 1996 for 99 years (between 01 January 1981 and 01 January 2080) over an area of 6,023 ha in Lot No. 1 Block 17 Lavang Land District, Bintulu Sarawak.	Yes
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	Field visit to Sujan Estate noted that boundaries are visibly maintained and verified during the visit at field S0006 (boundary with Sarawak State Land). Legal boundaries are clearly demarcated and visibly maintained throughout the estate. All the boundaries are visibly maintained as per company SOP.	Yes
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 be made available and that these should have been accepted with free prior informed consent (FPIC).		Yes



Criterio	n / Indicator	Assessment Findings	Compliance
	- Minor compliance -		
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 -	There is no customary land or negotiated agreements at Keresa Plantation (Sujan Estate) land.	Yes
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	The right to use the land is not disputed and there were no customary land within the Keresa Plantation (Sujan Estate).	Yes
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	Not applicable for Keresa Plantation (Sujan Estate) as there were no negotiation has occurred.	Yes
4.4 Princ	iple 4: Social responsibility, health, safety and employmen	t condition	
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 -	TQM department has conduct with the internal stakeholder on the 5/9/2014 using survey that includes the criteria of term & condition of work, social provision and safety & health. A summary report has been compiled and analysed.	Yes
		Joint consultative committee (JCC) meeting, internal stakeholder meeting that involve worker representative and chaired by AGM, Mr Khairul Azizan Alias. The latest meeting was conducted on 21/3/2018 that involved Jiba and Sujan estate. All issued has been discussed	

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n / Indicator	Assessment Findings	Compliance
	with current action plan has been established.	
	Session with Long House Leader@ Tuai Rumah, smallholders and	
	MPOB was carried out on 17/10/18. The intent is to explain on the associated smallholder disengagement under RSPO certification and also for MSPO SPOC group certification briefing by MPOB	
4.4.2: Complaints and grievances		
A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	The estate has established the procedure (Chapter 3: Complaints & Grievance Procedures dated: December 2009) to deal with complaints and grievances by using the complaint form. Sighted some of the complaint form at Jiba Estate, mostly complaint on the housing (light and fan not function).	Yes
The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. - Major compliance -	Inspection of records at estate indicated that written communications were replied promptly and the correspondence kept in file (KP5-19: Fail Cadangan/ Aduan/ Permintaan).	Yes
A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - Minor compliance -	The Estate maintains 'complaint form' and 'maintenance and repairing report' for receiving and responding to requests and complaints from employees. No external stakeholders were recorded related on complaint and grievances. Review of the registers found there was no outstanding or unresolved grievance.	Yes
	4.4.2: Complaints and grievances A system for dealing with complaints and grievances shall be established and documented. - Major compliance - The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. - Major compliance - A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.	A system for dealing with complaints and grievances shall be established and documented. The estate has established the procedure (Chapter 3: Complaints & Grievance Procedures dated: December 2009) to deal with complaints and grievances by using the complaint form. Sighted some of the complaint form at Jiba Estate, mostly complaint on the housing (light and fan not function). The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. Inspection of records at estate indicated that written communications were replied promptly and the correspondence kept in file (KP5-19: Fail Cadangan/ Aduan/ Permintaan). A complaint form should be made available at the premises, where employees and affected stakeholders can make complaint. The Estate maintains 'complaint form' and 'maintenance and repairing report' for receiving and responding to requests and complaints form employees. Ne external stakeholders were recorded related on complaint and grievances. Review of the registers found there was no



Criterio	n / Indicator	Assessment Findings	Compliance
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.	Interview with stakeholders found that they are aware of the procedure and no pending issues.	Yes
	- 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.	Record review found that previous complaints and requests from 2009 were still available.	Yes
	- Major compliance -		
Criterion	4.4.3: Commitment to contribute to local sustainable development		
4.4.3.1	Growers should contribute to local development in consultation with the local communities.	Keresa Plantation Sdn. Bhd. has taken the initiative to assist the smallholders such as providing technical assistant to obtain the RSPO certification. Apart from that, the plantation allows the local villagers	Yes
		to have the access of the road. The Plantation offers the contribution for those who were buying the seedling from keresa nursery with extra 50 seedlings and provide fertilizer at much cheaper price as compare to market to the smallholders which has been confirmed through smallholders interview.	
Criterion	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.	The estate has established the OSH Policy which was signed by the Managing Director dated 17/10/2017.	Yes
	- Major compliance -		

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Criterio	n / Indicator	Assessment Findings	Compliance
		The OSH plan for 2018 was established to cover the housing inspection, OSH audit, training, workplace inspection, OSH meeting etc which was prepared by SHE Exec, TQM Unit.	
4.4.4.2	 The occupational safety and health plan shall cover the following: a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall 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 identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). 	 Keresa Plantations has the OSH policy that has been communicated to the staff and workers. On site supervisors and estate assistant managers ensure the implementation of it. HIRARC – Latest review on 21/10/2018. Coverage of activities including the diesel storage, mess, community hall and riding motorcycle. In addition to specific training courses, safety briefings are given during muster. Sampled of the training:- i) Safety Briefing to Contractors (14/05/2018) ii) Store Management Workflow 2018 (08/05/2018) iii) Fire Safety Course (20/04/2018) Chemical register dated 01/10/2018 was sighted. Seen the chemical used were: i) Metsulfuron- Metsulfuron-Methyl ii) Mamba 360SL – Glyphosate 	Yes
	e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational	iv) Starane v) Hasten/Bivert	

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 Safety Health (Classification Packaging and Labeling) Regulation 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) 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 should be present at all field operations. A First Aid should be present at all field operations. A First Aid should be previewed periodically at quarterly intervals. • Major compliance - vi) Alion SDS for the said chemicals are available at each worksite. vi) Alion SDS for the said chemicals are available at each worksite. vi) Alion Major compliance - vi) Alion vi) Alion Sugan estate follows the Keresa Plantation fact Health (Use and standard of Exposure of Chemical Hazardous to Health) Regulation 2000. Keresa Plantation has established Safe & Standard Operating Procedure for Oil Plaim Plantations (SSOP) dated January 2011. (Doc ref KP2-5). Estate upkeep, crop evacuation, chemical and agrochemical management, pest control, highly toxic pesticides, working at height etc. CHRA (Ref: HQ/14/ASS/00/343-2018/001) was conducted on 26/01/2018 (Batch 2), 20/07/2018 (Batch 1), 04/07/2018 (Batch 5), 20/07/2018 (Batch 1), 04/07/2018 (Batch 5
At the estate, there is an appointed OSH Coordinator (TQM Exec) who is responsible for organizing safety training, meetings and

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Criterion / Indicator	Assessment Findings	Compliance
	Appointment of SHC Chairman: Abdul Aziz Bin Zainal Abidin (21/10/2018), SHC secretary: Adderly Tie Chung Siong (21/10/2018).	
	Refer OHS meeting minutes :	
	OHS meeting at Sujan Estate – #3: dated 20/10/2018, #2: dated 06/06/2018, #1: dated 29/03/2018. All the agenda was discussed accordingly during OHS meeting, e.g.: HSE accidents statistics, HSE target, HSE training, HSE promotion, Inspection and walkabout pre-audit, subcommittee report etc.	
	Records were available confirming that quarterly OSH meetings had been held at the estate.	
	Emergency Preparedness and Response Plan was developed for the following type of scenario :	
	i) ERP for Fire	
	ii) ERP for Bund Break	
	iii) ERP for Chemical and Fertilizer Spillage	
	iv) ERP for Suicide Attempt and Prevention	
	v) ERP for Bush Fire	
	vi) ERP for injury and illness require Medical attentions	
	vii) ERP for flood	
	ix) ERP for poisoning	
	x) ERP for workplace violence.	

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Criterior	/ Indicator	Assessment Findings	Compliance
		The estate has site specific Plans (refer to the above) including maps showing assembly areas and up-to-date lists of emergency contacts with training conducted to communicate the Plan. Interviews of estate staff and workers confirmed understanding of emergency response.	
		First Aid Kits are provided at various work sites at the estates and inspection confirmed these had been appropriately stocked. Verified on field visit location: Workshop and Fertilizer store.	
		All accidents are investigated and reported to Head Office. Seen the accident and injury report has been summarized on monthly basis for the whole Keresa Plantation.	
		Seen the report on month Sept 2018 (05 cases) and on month August 2018 (04 cases). The cases reported were mainly due to injury on the field work.	
		JKKP 8 was sent to DOSH on 11/01/2018.	
Criterion	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 -	The management has established a policy on good social ethics regarding human rights such as Human rights policy dated 30/11/17, Equal Rights Policy dated 1/12/2009, Prevention of sexual harassment & domestic violence in the workplace policy dated 1/12/2009, freedom of association policy dated 1/12/2009, etc. has been signed off by Managing Director of the group.	Yes



Criterio	n / Indicator	Assessment Findings	Compliance
		The policy was communicated by displayed at the strategic location, induction & training, memo and meeting. Keresa plantation has established Equal Rights Policy, signed by	
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.	Managing Director dated 1/12/09 to ensure equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. Inspection of a sample of pay records and interviews of staff and workers at the Mill did not identify any issues related to discrimination.	Yes
	- Major compliance -		
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance -	There is a contract and agreement for staff and workers including foreign workers and pay and conditions are documented and are above the industry minimum standard. Inspection of a sample of employee contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. Staff and Workers confirmed this during interview. Sampled Workers checked for September 2018 wages:	Yes
		 Emp. ID:11549 Emp. ID:10037 Emp. ID:11457 	
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.	Keresa Finance Department arranges contracts for the purchase of goods and services, including those with FFB suppliers. The contract clearly stated that the contractor must strictly follow all applicable national and ratified international laws.	Yes
	- Minor compliance -	Interviews of contractors indicated that they understand their contracts. Further interview with the contractor's workers found that they were paid at least meeting the minimum wages requirement.	



Criterio	n / Indicator	Assessment Findings	Compliance
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 -	Keresa Plantation (Sujan Estate) has a register of all staff and workers at the premise. The detail includes full name, gender, date of birth, date joined, job title. The basic wages, copy of passport and permit etc were maintained in the employee personnel file.	Yes
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 -	There is a contract and agreement for staff and workers including foreign workers and pay and conditions are documented and are above the industry minimum standard. Inspection of a sample of employee contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. 1. Emp. ID: 11549 - Contract 12/10/17- 12/10/19 2. Emp. ID: 11457 - Contract 12/08/17 -12/8/19 3. Emp. ID: 10037 - Contract 24/06/17 - 23/06/19 Details of rates for piece rated worker was not included in the main contract based on the contract sampled: 1. Emp. ID:11883 - Contract 14/07/18 - 14/07/20 2. Emp. ID:10082 - Contract 23/7/18 - 23/07/19 (contract extension) 3. Emp. ID:10176 - Contract 28/12/17 - 28/12/19 4. Emp. ID:11159 - Contract 25/07/18 - 25/07/20 6. Emp. ID:11883 - Contract 14/07/18 - 14/07/20 7. Thus, a major NC was issued.	Non- Compliance

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Criterion	/ 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 employees and employer. - Major compliance -	Keresa Plantation (Sujan Estate) has a daily attendance log sheet time recording system to monitor the working hours of its workers and staffs.	Yes
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 and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.	The management was in the progress of applying the overtime permit from labour department. Interview of workers and pay record shows the overtime payments are in accordance to law and workers are not forced to work overtimes.	Yes
	- 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 -	 Sample payslips checked found the overtime payments are documented in line with the Employee agreement. 1. Emp. ID:11549 2. Emp. ID:10037 3. Emp. ID:11457 	Yes
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.	Interviews of local and foreign workers indicated satisfaction with the standard of housing and facilities. Electricity and water are provided without charges. Keresa provide transport for children to school. Health Clinic has been provided for the employees and family members with free treatment. Outturn incentive for daily attendance on the muster and incentive of contract extension for foreign workers. Local employees has yearly bonus based on personal performance	Yes



Criterior	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 -	Residents at all company housing have access to facilities established by the company, such as health clinic, sports field, crèche, and places of worship.	Yes
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 -	Keresa Plantation has established prevention of sexual harassment & domestic violence in the workplace policy signed by Manging Director dated 1/12/09 and displayed at strategic location. Interviews of internal and external stakeholders confirmed awareness and understanding of the Policy.	Yes
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 -	Interviews of staff and workers confirmed Keresa Plantation supports freedom of association. At estate there is a local committee made up of workers representatives elected by workers. JCC meeting has been conducted for the internal stakeholder with the company management staffs. The last meeting was conducted on the 21/3/2018. Interview of Staff and Workers also confirmed their awareness of freedom of association but there was no worker unions being formed at the moment. Session with Long House Leader@ Tuai Rumah, smallholders and MPOB was carried out on 17/10/18. The intent is to explain on the associated samllhilder disengagement under RSPO certification and also for MSPO SPOC group certification briefing by MPOB.	Yes



Criterior	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.	Inspection of a sample of personnel files at the estate confirmed recruits' ages were checked against their Identity Card for Malaysian workers or their passport in the case of foreign workers. Under-age persons were not observed at any of the work locations visited.	Yes
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.	Sujan estate has prepared a HSE Training Plan 2018 for KMSB & KPSB that lists the internal and external training courses scheduled for the year. In addition estate has a schedule of "on-the-job" training for the main tasks. The estate also maintained training records for individual staff and workers, including induction of new workers.	Yes
	- Major compliance -	Training carried out for 2018:	
		i) SHE Policy (31/07/2018)	
		ii) SDS Training (27/02/2018)	
		iii) Grievance Procedure (03/03/2018)	
		iv) Chemical Handling (27/03/2018)	
		v) Scheduled Waste (07/04/2018)	
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	Sujan estate has conducted training needs assessment prior to prepare the annual training plan for the year 2018 for all the employee groups including new and existing workers and staffs. Training programs are	Yes

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Criterio	n / Indicator	Assessment Findings	Compliance
	competency required to all employees based on their job description.	based on worker's competency requirements. Workers must be properly trained before assigned to the respective work units.	
	- Major compliance -	On-site observation @ assessment will be carried out by field staff and assistant to monitor training effectiveness.	
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.	Continuous training program are planned and implemented covering all employees and contractors as per the documented training procedure.	Yes
	- Minor compliance -		
	Ciple 5: Environment, natural resources, biodiversity and economic structure 4.5.1: Environmental Management Plan	cosystem services	_
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.	Keresa Plantations Sdn. Bhd. has an Environmental policy dated 27/12/2016 that has been signed by the Managing Director and environmental management plan with relevant to the applicable laws and regulations. Interviews of staff and workers found that the policy	Yes
	- Major compliance -	has been communicated and implemented	
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives;	The established environmental management plan has covered the environmental aspects and impacts based on Keresa Plantations & Mill.	Yes
	 b) The aspects and impacts analysis of all operations. - Major compliance - 	The Environmental Aspect & Impact assessment has been reviewed on 01/09/2018. The assessment is conducted according to the Procedure Manual – Identification of Environmental Aspects and Evaluations of Environmental Impacts Ref: KPSB 1/2012 dated	

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Criterio	n / Indicator	Assessment Findings	Compliance
		01/01/2012. The scoring and evaluation criteria provided in this Manual. Sample of assessment reviewed:	
		Herbicides spraying activity which covers:	
		1. Mist	
		2. Chemical residue to water course	
		3. Chemical residue to land	
		EFB mulching and decanter cake application which covers:	
		1. Decanter cake	
		2. EFB/cake spilled into water course	
		3. EFB/cake overflow into water course	
		The mitigation plans related to the sample assessed above, has been reviewed and found satisfactory. Mitigation plans includes work procedures and training has been provided to the operators.	
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 continuous monitoring as per initial implementation was implemented on timely basis where for each operating unit the planned programs were included in annual budgeting. Results of the programs that were monitored will determine operational changes	Yes
	- Major compliance -	whether have positive or negative environmental impacts. The visit confirmed that programs gave continuous improvement accordingly to the company.	



Criterio	n / Indicator	Assessment Findings	Compliance
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Keresa Mill's environmental improvement program also includes continual improvement plans. For example, waste management, water quality, soil erosion, biodiversity, pesticides and etc.	Yes
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.	Annual training program of the estate includes environmental awareness and compliance related trainings to the executives, staffs and workers. The training was conducted accordingly on 31/07/2018.	Yes
	- Major compliance -		
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.	Environmental related matters were discussed during HSE meeting. The last HSE meeting was conducted on 20/10/2018. No issue related to environmental was raised during this meeting. Workers interview	Yes
	- Major compliance -	reveal that they are encouraged to discuss environmental issues with the management.	
Criterion	4.5.2: 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 an appropriate timeframe. There	The estate maintains records of energy usage, which is reported monthly to head office. The use of the fossil fuel against the FFB production is being monitored.	Yes
	should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.	Average for January 2018 to September 2018 : 6.51 litre/mt FFB	



Criterion / Indicator		Assessment Findings	Compliance
	- 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.	Sujan estate has estimation on total energy required. This estimation was compared to the actual usage by monthly and reported to the head office for monitoring.	Yes
	- Major compliance -		
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	Sujan estate has implemented buffalo assisted harvesting as to reduce usage of fossil fuel in field operation. The use of buffalo assisted harvesting is more cost effective compared to mechanize and diesel powered prime movers.	Yes
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 -	Based on documented pollution prevention plan (KM 4-1 Waste Register RSPO/ISCC), among the waste products identified and documented including general waste and scheduled waste. Sources of waste were from the mill, estates and housing area. Common waste identified including domestic waste and scheduled waste. For estates, its reusable and recyclable wastes identified included empty fertilizer bags and triple rinsed empty chemical containers. Organic biomass waste generated by estates including fronds and chipped fell palms. Other specific activities such as mill maintenance and estate vehicle workshop generate few categories of scheduled waste such as SW	Yes

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Criterio	n / Indicator	Assessment Findings	Compliance
		305, SW 306, SW 409 and SW 410. Clinic operation generated clinical waste.	
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 - 	Documented pollution prevention plan (KM 4-1) was emphasized in the pollution prevention plan where the site visit confirmed that the practice of reduce, reuse and recycle of materials has been implemented throughout the company mill and estates. Method of handling the domestic/general wastes are segregation at the collection point from offices and housing area before being disposed through landfill. For scheduled wastes, the handling was done according to the legal requirement where a scheduled waste store was constructed in each operating unit for storage. A company registered with DOE, Trienekens (Sarawak) Sdn Bhd (DOE #004932) was appointed to collect the scheduled waste from all the scheduled waste storage facilities within the company. Latest disposal was done on 28/05/2018 for SW305 & SW306 (C/N #KRS286B0118001) & SW410 (C/N #KRS286B0318001). Clinical waste from the clinic was disposed through Bintulu Specialist Hospital Sdn. Bhd. as the authorized clinical waste collection and disposal contractor appointed by the company. Latest disposal was done on 05/09/2018.	Yes

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Criterion / Indicat	tor	Assessment Findings	Compliance
for hand Environm Environm handling,	agement shall establish Standard Operating Procedure dling of used chemicals that are classified under nent Quality Regulations (Scheduled Waste) 2005, nental Quality Act, 1974 to ensure proper and safe , storage and disposal. compliance -	 SOP for scheduled waste dated 15/10/2009 was established. For scheduled wastes, the handling was done according to the legal requirement where a scheduled waste store was constructed in each operating unit for storage. A company registered with DOE, Trienekens (Sarawak) Sdn Bhd (DOE #004932) was appointed to collect the scheduled waste from all the scheduled waste storage facilities within the company. Latest disposal was done on 28/05/2018 for SW305 & SW306 (C/N #KRS286B0118001) & SW410 (C/N #KRS286B0318001). Clinical waste from the clinic was disposed through Bintulu Specialist Hospital Sdn Bhd as the authorized clinical waste collection and disposal contractor appointed by the company. Latest disposal was done on 05/09/2018. However, it was noted that the Medical Assistant (MA) transports the clinical waste to Bintulu Specialist Hospital for disposal. The disposal is not according to Guidelines on the Handling and Management of Clinical Waste in Malaysia 2009. Also not according to the Waste Management Procedure in Keresa Plantations Sdn Bhd & Keresa Mill Sdn Bhd – 3.2.3.11 Clinical waste stored to be collected and disposed by the registered contractor under DOE. There is no approval from DOE to transport the clinical waste to Bintulu Specialist Hospital. Major NC issued. 	Non- compliance



Criterio	n / Indicator	Assessment Findings	Compliance
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 national programme on recycling of used HDPE pesticide containers.	spot painted in red before return back to supplier. Visit and records confirmed that no empty chemical containers being disposed other	Yes
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. - Minor compliance -	Domestic wastes are being disposed at estate landfill and it's away from watercourse. At Sujan Estate, landfill area is located at field S0201	Yes
Criterion	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. - Major compliance -	The established environmental management plan has covered the environmental aspects and impacts based on Keresa Plantations & Mill. The Environmental Aspect & Impact assessment has been reviewed. The assessment is conducted according to the Procedure Manual – Identification of Environmental Aspects and Evaluations of Environmental Impacts Ref: KPSB 1/2012 dated 01/01/2012. The scoring and evaluation criteria provided in this Manual. Sujan estate has done environmental impact and aspect identification involving all the activities within the estate.	Yes



Criterio	n / Indicator	Ass	essment Findings		Compliance
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	•	nt plan include assessment operation such as waste, a		Yes
Criterion	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: a. Assessment of water usage and sources of supply.	Keresa Plantations Sdn Bl 20/07/2017 was sighted. promote efficient use o requirements under Sarav Interim National Water Sta	Including specific paramet f water and meet water vak Water Resource Enact	ers for WMP to er conservation	Yes
	 b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities. c. Ways to optimize water and nutrient usage to reduce 	Water management plan (KP 2-201 dated lune 2010) involved wate		hich inclusive of itoring. Drinking Quality Standard	
	wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).			ablishment (Ref.	
	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.	Buffer zones established as River width > 40 meters			
	e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.	20 to 40 meters 10 to 20 meters 5 to 10 meters < 5 meters	40 meters 20 meters 10 meters 5 meters		

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Criterio	n / Indicator	Assessment Findings	Compliance
	 f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually. Major compliance - 	Sujan Estate implemented the river water monitoring by taking water samples from 7 sampling points of river and streams running through the estate including Sg. Jiba, Sg. Semerah, Sg. Jampang and Sg. Besal. Sample analyses were done every 3 months by ESI Sampling Sdn. Bhd. Sampled analysis report (Report period of April – Jun 2018; Ref. # NREB/6-1/2G/6) shown that analysis were done against Class IIA of NWQSM and the results were in-compliance with the standard. The result for water analysis which was done on 29/06/2018 (Report No: KPSB/08-06/028) shown all the parameters were within the limits.	
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance -	There were no construction of bunds, weirs and dams across main rivers or waterways passing through an estate.	Yes
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). - Minor compliance -	Water management plan includes rain water harvesting, desilting of road side drains and etc. For housing complex, the rain water harvesting was used for cleaning housing compound and etc.	Yes
Criterion 4.5.6: Status of rare, threatened, or endangered species and 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:	Keresa Plantations had engaged a consultant (Wild Asia) in 2009 to conduct a biodiversity assessment of the land at the Estate as well as preparation of site-specific short-term and long-term HCV Management Plans. The report for Environmental and Biodiversity	Yes



a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. Review dated May 2010 by Wild Asia was sighted. There was no HCV and rare, threatened, or endangered species being identified within the estate area. b) 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. There was no HCV and rare, threatened, or endangered species being identified within the estate area. 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: There was no HCV and rare, threatened, or endangered species being identified within the estate area. No illegal hunting signages are prominently erected at the estate entrance and other strategic area and awareness training has been given to workers and other stakeholders. No illegal nunting signages are prominently erected at the estate entrance and other stakeholders. No illegal nunting signages are prominently erected at the estate entrance and other strategic area and awareness training has been given to workers and other stakeholders. No illegal number stakeholders. No illegal number stakeholders. No illegal number stakeholders. Yes 4.5.6.3 A management plan to comply with Indicator 1 shall be There was no HCV and rare, threatened, or endangered species being Yes	Criterio	n / Indicator	Assessment Findings	Compliance
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 compliance4.5.6.2If 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.There was no HCV and rare, threatened, or endangered species being identified within the estate area.Yes4.5.6.3A management plan to comply with Indicator 1 shall beThere was no HCV and rare, threatened, or endangered species being iven to workers and other strategic, or endangered species being given to workers and other strategic, area and awareness training has been given to workers and other strategic area and awareness training has been given to workers and other strategic area and awareness training has been given to workers and other strategic area and awareness training has been given to workers and other strategic area and awareness training has been given to workers and other strategic area and awareness training has been given to workers and other strategic area and awareness training has been given to workers and other strategic area and awareness training has been given to workers and other strategic area and awareness training has been given to workers and other strategic area and awareness training has been given to workers and other strategic area and awareness training has been given to workers and other strategic area and awareness training has been given to workers and other strategic area and awareness training has been given to workers and other strategic area and awareness training has b		rare and threatened ecosystems, that could be significantly	and rare, threatened, or endangered species being identified within	
4.5.6.2If 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.There was no HCV and rare, threatened, or endangered species being identified within the estate area.Yesb) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts. - Major compliance -No illegal hunting signages are prominently erected at the estate entrance and other strategic area and awareness training has been given to workers and other stakeholders.Yes4.5.6.3A management plan to comply with Indicator 1 shall beThere was no HCV and rare, threatened, or endangered species being there was no HCV and rare, threatened, or endangered species being yesYes		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)		
 4.3.6.2 If rare, threatened or endangered species, or nigh 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 - 4.5.6.3 A management plan to comply with Indicator 1 shall be 		- Major compliance -		
 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 - 4.5.6.3 A management plan to comply with Indicator 1 shall be 	4.5.6.2	biodiversity value, are present, appropriate measures for	identified within the estate area.	Yes
 b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts. - Major compliance - 4.5.6.3 A management plan to comply with Indicator 1 shall be There was no HCV and rare, threatened, or endangered species being Yes 			entrance and other strategic area and awareness training has been	
4.5.6.3 A management plan to comply with Indicator 1 shall be There was no HCV and rare, threatened, or endangered species being Yes		collecting activities; and developing responsible measures to		
		- Major compliance -		
established and effectively implemented, if required. identified within the estate area.	4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.	There was no HCV and rare, threatened, or endangered species being identified within the estate area.	Yes
- Major compliance -		- Major compliance -		



Criterion	/ Indicator	Assessment Findings	Compliance
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.	Keresa Plantations has established and implemented Best Management Practice (KP 2) approach through its standard operations and procedures (KP2-4 SOPs –Field Policy Manual).	Yes
	- Major compliance -	Under its conservation measures chapter entitled Environment Conservation (SOP #7 iii; version 2 dated 1 Jan 2009), all mitigations measures for plantation activities including land preparation or replanting shall be in compliance with the approved Environment Impact Assessment (EIA) by Natural Resource and Environmental Board of Sarawak. This is including Zero Open Burning practices where the visit to the field and facilities confirm that the company are in compliance of its Zero Open Burning policy.	
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.		Yes
	- 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.	Not applicable for Sujan estate.	Yes
	- Major compliance -		



Criterior	n / Indicator	Assessment Findings	Compliance
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	Not applicable for Sujan estate. Currently, there is no replanting at Sujan Estate.	Yes
4.6 Princ	iple 6: Best Practices		
4.0 FINC			
Criterion	4.6.1: Site Management		
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.	Keresa Plantations has well established management systems for monitoring and control of best practice implementation at its estate. This includes the programme of regular internal audits by TQM and agronomist for maintaining and improving the production. Fertilizer recommendation for 2018 was made available. Date of the last visit as follows: Agronomist visit: 26-28/9/2017 For 2018, the visit is planned on 4-7/11/18 by external agronomist, Mr Chong Choon Fong.	Yes
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.	Sujan Estate has overlain a topographic map on the soil map to identify areas of potential erosion risk at Sujan Estate. The estate has identified steep areas for setting aside as conservation areas when replanting is due. Inspection of field conditions at estate showed well established and maintained groundcover vegetation.	Yes
	- Major compliance -		



Criterio	n / Indicator	Assessment Findings	Compliance
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	Inspection of field conditions at sloping areas and terraces, found stacking of pruned fronds along the contour for protection against soil erosion was relatively consistent.	Yes
Criterion	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.		Yes
	- 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 1997. Based on long range replanting programme (2020-2029). The next replanting is planned in 2023.	Yes
	- Major compliance -		
4.6.2.3	The business or management plan may contain:	Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business	Yes
	a) Attention to quality of planting materials and FFB	plan contains FFB yield, costs of production, etc. It also includes environment, social (workers and staffs welfare), and health and safety component and associated capital expenditure for improvement of smallholder schemes.	
	b) Crop projection: site yield potential, age profile, FFB yield trends		
	c) Cost of production : cost per tonne of FFB		
	d) Price forecast	CAPEX gazetted for 2019:	



Criterio	n / Indicator	Assessment Findings	Compliance
	e) e) Financial indicators : cost benefit, discounted cash flow, return on investment	i) Water Treatment Plant and Mini Workshop	
	- Major compliance -	ii) Vehicle – Motor Grader and farm tractor	
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 -	Keresa Plantations monitored the estate performance against the targets. It also recommends changes to the plans if necessary.	Yes
Criterion 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 -	The pricing method has been clearly stated in the contract and contractors are explained on the term of contracts prior to the signing of contract. Refer to contract dated 1/5/18 under Ling Brothers Machinery for FFB transportation.	Yes
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Sample contract and payment record verification together with interviews of suppliers and contractor found the payments has been made as per contract. Sampled Contractor (Ling Brothers Machinery). Refer to tax invoice #I-000172 dated 30/9/2018 paid in timely manner.	Yes
Criterion 4.6.4: Contractor			
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information.	Keresa plantation has initiated the MSPO awareness to all its contractors. Latest MSPO awareness briefing to contractors was	Yes

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Criterio	n / Indicator	Assessment Findings	Compliance
	- Major compliance -	conducted on 15/8/18 by TQM Team. Interview with the contractors found that they understand on the MSPO requirements.	
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor Major compliance -	Keresa Plantation has prepared a standard contract for all the contractors. The signed copy of the contract available at the estate office. Sample of contract agreement under Ling Brothers Machinery for FFB transportation dated 1/5/18.	Yes
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	Keresa Plantation has no objection to allow BSI auditors to verify the assessment through physical inspection if required.	Yes
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 -	Sample contract and payment record verification together with interviews of suppliers and contractor found the payments has been made as per contract. The management monitored by checking and signing the assessment of the contractor for each task before the payment was made. Sampled Contractor (Ling Brothers Machinery-FFB Transporter). Refer to tax invoice #I-000172 dated 30/9/2018 paid in timely manner.	Yes





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

Criterio	n / Indicator	Assessment Findings	Compliance		
4.1 Principle 1: Management commitment & responsibility					
Criterion	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 company has initiated the implementations of MSPO requirements. MSPO Policy has been established and signed by Senior Group General Manager dated April 2015.	Yes		
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	The established policy has emphasized on the commitment to sustainable development and continuous improvement with the objective of improving the milling and estate operation.	Yes		
Criterion	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.	The MSPO Internal Audit Procedure (KERESA/MSPO/QP-10; Rev 1; Effective date: 27/09/2016) was established. The internal audit need to be conducted annual.	Yes		
	- Major compliance -	Annual MSPO internal audit was carried from 04/09/2018 to 07/09/2018. Audit covered both documentation and field operation for the mill and estates. There were 05 Major NCs raised by the Internal Auditors. Audit report was available with the summary of findings for each respective work units.			



Criterio	n / 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 (KERESA/MSPO/QP-10; Rev 1; Effective date: 27/09/2016) was established and effectively implemented. The procedure was reviewed by the management to include the competency requirement for MSPO internal auditor.	Yes
	- Major compliance -	The Internal Audit was led by (Lead Auditor) Mr Nofri Bin Zulkefli; (Auditor) Winnie Siman, Alicesa Ramba, Eliza Nojin & Adderly Tie Chung Siong.	
4.1.2.3	Report shall be made available to the management for their review.	Internal audit report dated 07/09/2018 was made available for management review.	Yes
	- Major compliance -		
Criterion	4.1.3 – Management Review		
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for	The Management Review Procedure (First Editions; Version 1.0) dated September 2015 was established.	Yes
	effective implementation of MSPO and decide on any changes, improvement and modification.	MSPO Management Review was carried out on 24/09/2018. Minute Meeting of Management Review MSPO was available. All pertinent	
	- Major compliance -	elements for MSPO implementation has been reviewed and presented to top management.	
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 opportunities of the company.	TQM has worked with the estate to review and update the social and environmental aspects and impacts risk registers and to develop improvement plans.	Yes
	- Major compliance -		
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Criterior	n / Indicator	Assessment Findings	Compliance
4.1.4.2	The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption.	The estate has optimized the use of mechanized operations to reduce pollutions.	Yes
	- Major compliance -		
4.1.4.3	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be	The estate has appointed the assistant manager as in charge person to implement and monitor any new technologies being implemented and training of other personnel's.	Yes
	established. - Major compliance -	Currently, the estate has optimized the use of mechanized operations to reduce pollutions.	
4.2 Princ	iple 2: Transparency		
Criterion 4	2.1 – Transparency of information and documents relevant to MSF	PO requirements	
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.	Jiba Estate has maintained records of requests and responses, Land titles/user rights, Safety and health plans, plans and impact assessments relating to environmental and social impact, plans for pollution prevention, records of complaints and grievances, plans for continuous improvement and make available upon request.	Yes
	- Major compliance -		



Criterio	n / Indicator	Assessment Findings	Compliance
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 -	Jiba Estate holds copies of each of the management documents that are required to be publicly available. Copies of the document such as Plans and impact assessments relating to environmental and social impact, Plans for pollution prevention, records of complaints and grievances were available on request. Keresa policy is to make documents and copies of the document publicly available on request, except those relating to commercial confidentiality.	Yes
Criterion	4.2.2 – Transparent method of communication and consultation		
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	Keresa Plantation Sdn Bhd has established and implement Complaints & Grievances Procedure (Ref. SOC 3.2, Version 1) that define the responsibilities and actions required for receiving, recording and responding to enquiries and requests from internal and external stakeholders. The estate has implemented the "Communication and Consultation Management guidelines" as evidenced by the maintenance of filing systems for recording written requests for assistance and information. Inspection of a sample of records found that requests for information were received only from Government Departments (DOE, DOSH, MPOB) and complaint form from the local communities. Furthermore, worker & smallholder survey has been conducted from time to time for establishing active communication.	Yes
4.2.2.2	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.	The TQM Executive (Haliza Amir) has been appointed as Social Management Representative for internal and external stakeholders. The responsibilities have been stated in the appointment letter dated	Yes

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Criterio	n / Indicator	Assessment Findings	Compliance
4.2.2.3	 Minor compliance - 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 - 	 11/10/18. Interviews with Stakeholders confirmed that Keresa has an open approach to communication with staff, workers and local communities. Stakeholder list available that include the supplier, contractor, smallholders, external stakeholders plantation, villagers & government agency such as DOSH, MPOB, DOE, Labour department & etc. For internal stakeholder, JCC meeting was used to collect feedback. The action request has been recorded and track by Ms Winnie. Request from government agency was by visit log book such as MPOB, DOE and DOSH. The action has been taken accordingly and recorded. Joint consultative committee (JCC) meeting, internal stakeholder meeting that involve worker representative and chaired by group estate manager, Mr Handrick Lagang. The latest meeting was conducted on 21/3/2018 that involved Jiba and Sujan estate. All issued has been discussed with current action plan has been established. Session with Long House Leader@ Tuai Rumah, smallholders and 	Yes
		MPOB was carried out on 17/10/18. The intent is to explain on the associated smallholder disengagement under RSPO certification and also for MSPO SPOC group certification briefing by MPOB	
Criterion 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).	SOP on the traceability of the FFB has established in ISCC Management System guidelines revision 1. Refer to SOP/ISCC/KPSB/EST 04 dated 25/10/17.	Yes
	- Major compliance -		



Criterio	n / Indicator	Assessment Findings	Compliance
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Traceability inspection report carried out on monthly basis. Refer to report dated 24 October 2018 for Jiba Estate Division (Mapo, Semerah and Belungai). The detail of the record includes daily despatch quantity and division which show the traceability from field to the POM.	Yes
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system.	Eliza Nojin (TQM Executive) has been assigned to maintain the traceability system. The appointment letter dated 1/1/17 with job responsibility has been clearly defined.	Yes
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained Major compliance -	Inspection of records confirmed these were updated daily. Verified traceability records: i) Harvesting summary record dated 24/10/18 for Belungai 01 Division. ii) Driver FFB daily collection dated 24/10/18, tractor# LB.03	Yes
4.3 Princ	iple 3: Compliance to legal requirements		
Criterion	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.	Keresa Plantation has maintained the systems for documentation, checking and assessment of legal compliance with applicable laws and regulations.	No

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Criterio	n / Indicator	Assessment Findings	Compliance
	- Major compliance -	Inspection of records showed that the estates has maintained legal compliance with statutory requirements.	
		Sample of permit and license sighted at Jiba Estate were :	
		i) MPOB licence for nursery – registered under Keresa Plantations Sdn Bhd, 516060011000 (valid until 31/10/2019)	
		ii) MPOB license – registered under Keresa Plantations Sdn Bhd, 503656102000 (valid until 28/02/2019)	
		iii) Petrol License #A31608 - Bintulu Development Authority (BDA) SPL000005 (valid until 31/12/2018)	
		iv) Diesel/petrol KPDNKK (BTU.P.33/2007(D), BLESS #BL2017066107 Serial number Q007291 valid until 23/11/2018. Quantity (15,000 litres).	
		v) Trading License – The Business, Professions and Trading License Ordinance. (Borang I, Seksyen 5, 23 dan 24(2)) – No. 882820 valid until 14/04/2019.	
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register. - Major compliance -	A Legal Compliance procedure has been established (KP 16 Mechanism for ensuring legal compliance dated 15 Mar 2010). All operating units have Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. TQM sustainability department	Yes
		have reviewed and updated the LORR at both mil and estates on 02/10/2017.	
		All the new legal requirements were include in the legal register accordingly:	
		i) Minimum Wages Order 2016	

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Criterio	n / Indicator	Assessment Findings	Compliance
		ii) Occupational Safety & Health Act 1994 (Act 514) Regulation & Orders	
		iii) Labour Ordinance (Sarawak CAP.76)	
		iv) Labour Act 1955	
		v) Environmental Quality Act 1974 (Act 127)	
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.	Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office.	Yes
	- Major compliance -	On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operations. Tracking system on any changes in the law been well implemented.	
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.	The person responsible has not effectively monitored compliance to the Sarawak Labour Ordinance (Cap 67), Section 109 (Payment of wages). Salary payment is by cash and paid at estate's office and paid after 7th of the following month. Checked 3 months payment form	Non- Compliance
	- Minor compliance -	July – September 2018:	
		i) September 2018: Cash received on 9/10/18, refer to delivery note# 85352 by Guard and Escort Services (S) Sdn Bhd. Payment is made on 9/10/18 with employees acknowledgement in the check roll report GPR74BMW	
		ii) August 2018: Cash received on 12/9/18, refer to delivery note# 75282 by Guard and Escort Services (S) Sdn Bhd. Payment is made on 12/10/18 with employees acknowledgement in the check roll report GPR74BMW	

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Criterio	n / Indicator	Assessment Findings	Compliance
		iii) July 2018: Cash received on 11/8/18, refer to delivery note# 75389 by Guard and Escort Services (S) Sdn Bhd. Payment is made on 11/8/18 with employees acknowledgement in the check roll report GPR74BMW.	
		Previous NC was not effectively close thus upgraded to major NC.	
Criterion	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 -	Keresa Estate operation is on lease land. There are documents in place showing legal ownership or lease and a history of land tenure. As reported during the last assessment, estate was developed on State Lease Land, issued by Department of Land and Survey; Bintulu Division dated 28 December 1996 for 99 years (between 01 January 1981 and 01 January 2080) over an area of 6,023 ha in Lot No. 1 Block 17 Lavang Land District, Bintulu Sarawak.	Yes
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 -	Keresa Estate operation is on lease land. There are documents in place showing legal ownership or lease and a history of land tenure. As reported during the last assessment, estate was developed on State Lease Land, issued by Department of Land and Survey; Bintulu Division dated 28 December 1996 for 99 years (between 01 January 1981 and 01 January 2080) over an area of 6,023 ha in Lot No. 1 Block 17 Lavang Land District, Bintulu Sarawak.	Yes
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.	Field visit to Jiba Estate noted that boundaries are visibly maintained and verified during the visit at field J98 (boundary with Rh Lawai). Legal boundaries are clearly demarcated and visibly maintained	Yes



n / Indicator	Assessment Findings	Compliance	
- Major compliance -	throughout the estate. All the boundaries are visibly maintained as per company SOP.		
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 be made available and that these should have been accepted with free prior informed consent (FPIC).	There was no land disputes noted during the audit at Jiba Estate as the estate has the legal ownership documents which was under the Keresa Plantation Sdn. Bhd.	Yes	
- Minor compliance -			
Criterion 4.3.3 – Customary rights			
Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.	There is no customary land or negotiated agreements at Keresa Plantation (Jiba Estate) land.	Yes	
- Major compliance -			
Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	The right to use the land is not disputed and there were no customary land within the Keresa Plantation (Jiba Estate).	Yes	
Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	Not applicable for Keresa Plantation (Jiba Estate) as there were no negotiation has occurred.	Yes	
	 Major compliance - 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 be made available and that these should have been accepted with free prior informed consent (FPIC). Minor compliance - 4.3.3 – Customary rights 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 - Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. Minor compliance - Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. 	• Major compliance - throughout the estate. All the boundaries are visibly maintained as per company SOP. 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 be made available and that these should have been accepted with free prior informed consent (FPIC). There was no land disputes noted during the audit at Jiba Estate as the estate has the legal ownership documents which was under the Keresa Plantation Sdn. Bhd. 4.3.3 - Customary rights Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. There is no customary land or negotiated agreements at Keresa Plantation (Jiba Estate) land. • Major compliance - Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. The right to use the land is not disputed and there were no customary land within the Keresa Plantation (Jiba Estate). • Minor compliance - Not applicable for Keresa Plantation (Jiba Estate) as there were no negotiated agreements should be made available.	



Criterio	n / Indicator	Assessment Findings	Compliance
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 -	TQM department has conduct with the internal stakeholder on the 5/9/2014 using survey that includes the criteria of term & condition of work, social provision and safety & health. A summary report has been compiled and analysed.	Yes
Criterion	4.4.2: Complaints and grievances		L
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	The estate has established the procedure (Chapter 3: Complaints & Grievance Procedures dated: December 2009) to deal with complaints and grievances by using the complaint form. Sighted some of the complaint form at Jiba Estate, mostly complaint on the housing (light and fan not function).	Yes
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 -	Inspection of records at estate indicated that written communications were replied promptly and the correspondence kept in file (KP5-19: Fail Cadangan/ Aduan/ Permintaan).	Yes
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 -	The Estate maintains 'complaint form' and 'maintenance and repairing report' for receiving and responding to requests and complaints from employees. No external stakeholders were recorded related on complaint and grievances. Review of the registers found there was no outstanding or unresolved grievance.	Yes



Criterio	n / Indicator	Assessment Findings	Compliance	
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.	Interview with stakeholders found that they are aware of the procedure and no pending issues.	Yes	
	- 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.	Record review found that previous complaints and requests from 2009 were still available.	Yes	
	- Major compliance -			
Criterion	4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Growers should contribute to local development in consultation with the local communities Minor compliance -	Keresa Plantation Sdn. Bhd. has taken the initiative to assist the smallholders such as providing technical assistant to obtain the RSPO certification. Apart from that, the plantation allows the local villagers to have the access of the road. The Plantation offers the contribution for those who were buying the seedling from keresa nursery with extra 50 seedlings and provide fertilizer at much cheaper price as compare to market to the smallholders which has been confirmed through smallholders interview.	Yes	
Criterion	Criterion 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.	The estate has established the OSH Policy which was signed by the Managing Director dated 17/10/2017.	Yes	
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Criterio	on / Indicator	Assessment Findings	Compliance
	- Major compliance -	The OSH plan for 2018 was established to cover the housing inspection, OSH audit, training, workplace inspection, OSH meeting etc which was prepared by SHE Exec, TQM Unit.	
4.4.4.2	The occupational safety and health plan shall cover the following:k) A safety and health policy, which is communicated and implemented.	Keresa Plantations has the OSH policy that has been communicated to the staff and workers. On site supervisors and estate assistant managers ensure the implementation of it.	Yes
	 I) The risks of all operations shall be assessed and documented. 	HIRARC – Latest review on 21/10/2018. Coverage of activities including the diesel storage, mess, community hall and riding motorcycle.	
	m) An awareness and training programme which includes the following requirements for employees exposed to pesticides:	In addition to specific training courses, safety briefings are given during muster. Sampled of the training:-	
	iii. all employees involved shall be adequately trained on safe working practices	i) Safety Briefing to Contractors (14/05/2018)ii) Store Management Workflow 2018 (08/05/2018)	
	 iv. all precautions attached to products shall be properly observed and applied 	iii) Fire Safety Course (20/04/2018) iv) Forst Aid Training (22/02/2018)	
	n) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as	Chemical register dated 01/10/2018 was sighted. Seen the chemical used were:	
	Hazard Identification, Risk Assessment and Risk Control (HIRARC).	i) Metsulfuron- Metsulfuron-Methyl ii) Mamba 360SL – Glyphosate	
	 o) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and 	iii) Starmix	

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Criterion / Indicator	Assessment Findings	Compliance
 safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. p) 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. q) 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. r) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees. s) 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. t) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals. - Major compliance - 	 iv) Starane v) Hasten/Bivert vi) Alion SDS for the said chemicals are available at the store in Dual-language (Bahasa Malaysia and English). Jiba estate follows the Keresa Plantations SOP for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labelling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. Keresa Plantation has established Safe & Standard Operating Procedure for Oil Palm Plantations (SSOP) dated January 2011. (Doc ref KP2-5). Estate upkeep, crop evacuation, chemical and agrochemical management, transportation of workers, utilities management, pest control, highly toxic pesticides, working at height etc. CHRA (Ref: HQ/14/ASS/00/343-2018/001) was conducted on 26/01/2018 at Keresa Plantations Sdn Bhd (Jiba Estate & Sujan Estate) by DOSH registered assessor, HQ/14/ASS/00/343. Medical surveillance was conducted on 28/06/2018 (Batch 1), 04/07/2018 (Batch 2), 20/07/2018 (Batch 3), 03/08/2018 (Batch 4) & 17/08/2018 (Batch 5) by Occupational Health Doctor DOSH Reg. No. JKKP HQ/08/DOC/00(206). Result of the Medical Examinations found to be normal without any health detrimental issues. 	

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Criterion / Indicator	Assessment Findings	Compliance
	At the estate, there is an appointed OSH Coordinator (TQM Exec) who is responsible for organizing safety training, meetings and investigation and reporting of accidents and Incidents.	
	Appointment of SHC Chairman: Abdul Aziz Bin Zainal Abidin (21/10/2018), SHC secretary: Adderly Tie Chung Siong (21/10/2018).	
	Refer OHS meeting minutes :	
	OHS meeting at Jiba Estate – #3: dated 20/10/2018, #2: dated 06/06/2018, #1: dated 29/03/2018. All the agenda was discussed accordingly during OHS meeting, e.g.: HSE accidents statistics, HSE target, HSE training, HSE promotion, Inspection and walkabout pre-audit, subcommittee report etc.	
	Records were available confirming that quarterly OSH meetings had been held at the estate.	
	Emergency Preparedness and Response Plan was developed for the following type of scenario:	
	i) ERP for Fire	
	ii) ERP for Bund Break	
	iii) ERP for Chemical and Fertilizer Spillage	
	iv) ERP for Suicide Attempt and Prevention	
	v) ERP for Bush Fire	
	vi) ERP for injury and illness require Medical attentions	
	vii) ERP for flood	

Criterio	n / Indicator	Assessment Findings	Compliance
		ix) ERP for poisoning	
		x) ERP for workplace violence.	
		The estate has site specific Plans (refer to the above) including maps showing assembly areas and up-to-date lists of emergency contacts with training conducted to communicate the Plan. Interviews of estate staff and workers confirmed understanding of emergency response.	
		First Aid Kits are provided at various work sites at the estates and inspection confirmed these had been appropriately stocked. Verified on field visit location: Workshop and Fertilizer store.	
		All accidents are investigated and reported to Head Office. Seen the accident and injury report has been summarized on monthly basis for the whole Keresa Plantation.	
		Seen the report on month March 2018 (03 cases), April 2018 (01 case) and May 2018 (03 cases). The cases reported were mainly due to injury on the field work.	
		JKKP 8 was sent to DOSH on 11/01/2018.	
Criterion	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.	& domestic violence in the workplace policy dated 1/12/2009, freedom	Yes
	- Major compliance -	of association policy dated 1/12/2009, etc. has been signed off by Managing Director of the group.	



Criterio	n / Indicator	Assessment Findings	Compliance
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 -	The policy was communicated by displayed at the strategic location, induction & training, memo and meeting. Keresa plantation has established Equal Rights Policy, signed by Managing Director dated 1/12/09 to ensure equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. Inspection of a sample of pay records and interviews of staff and workers at the Mill did not identify any issues related to discrimination.	Yes
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance -	There is a contract and agreement for staff and workers including foreign workers and pay and conditions are documented and are above the industry minimum standard. Inspection of a sample of employee contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. Staff and Workers confirmed this during interview. Sampled Workers checked for September 2018 wages:	Yes
		 Emp. ID:11883 Emp. ID:10082 Emp. ID:10176 Emp. ID:11559 Emp. ID:11990 Emp. ID:11883 	
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the	Keresa Finance Department arranges contracts for the purchase of goods and services, including those with FFB suppliers. The contract clearly stated that the contractor must strictly follow all	Yes

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Criterion	/ Indicator	Assessment Findings	Compliance
	employment contract agreed between the contractor and his employee Minor compliance -	applicable national and ratified international laws. Interviews of contractors indicated that they understand their contracts. Further interview with the contractor's workers found that they were paid at least meeting the minimum wages requirement.	
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 -	Keresa Plantation (Jiba Estate) has a register of all staff and workers at the premise. The detail includes full name, gender, date of birth, date joined, job title. The basic wages, copy of passport and permit etc were maintained in the employee personnel file.	Yes
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 -	There is a contract and agreement for staff and workers including foreign workers and pay and conditions are documented and are above the industry minimum standard. Inspection of a sample of employee contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. 1. Emp. ID:11883 - Contract 14/07/18 – 14/07/20 2. Emp. ID:10082 - Contract 23/7/18 – 23/07/19 (contract extension) 3. Emp. ID:10176 - Contract 28/12/17 – 28/12/19 4. Emp. ID:11159 - Contract 04/10/17 – 04/10/19 5. Emp. ID:11990 - Contract 25/07/18 – 25/07/20 6. Emp. ID:11883 - Contract 14/07/18 – 14/07/20	Non- Compliance

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Criterio	n / Indicator	Assessment Findings	Compliance
		As for piece rated workers, the rates detail was not included in the main contract based on the contract sampled: 1. Emp. ID: 11549 - Contract 12/10/17- 12/10/19 2. Emp. ID: 11457 - Contract 12/08/17 -12/8/19 3. Emp. ID: 10037 – Contract 24/06/17 - 23/06/19 Thus, a major NC was issued	
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.	Keresa Plantation (Jiba Estate) has a daily attendance log sheet time	Yes
	- 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 and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.	The management was in the progress of applying the overtime permit from labour department. Interview of workers and pay record shows the overtime payments are in accordance to law and workers are not forced to work overtimes.	Yes
	- 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.	Sample payslips checked found the overtime payments are documented in line with the Employee agreement. 1. Emp. ID:11883	Yes
	- Major compliance -	 Emp. ID:10082 Emp. ID:10176 Emp. ID:11559 	
		5. Emp. ID:11990	

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Criterior	n / Indicator	Assessment Findings	Compliance
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. - Minor compliance -	 6. Emp. ID:11883 Interviews of local and foreign workers indicated satisfaction with the standard of housing and facilities. Electricity and water are provided without charges. Keresa provide transport for children to school. Health Clinic has been provided for the employees and family members with free treatment. Outturn incentive for daily attendance on the muster and incentive of contract extension for foreign workers. Local employees has yearly bonus based on personal performance 	Yes
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 -	Residents at all company housing have access to facilities established by the company, such as health clinic, sports field, crèche, and places of worship.	Yes
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 -	Keresa Plantation has established prevention of sexual harassment & domestic violence in the workplace policy signed by Manging Director dated 1/12/09 and displayed at strategic location. Interviews of internal and external stakeholders confirmed awareness and understanding of the Policy.	Yes
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	Interviews of staff and workers confirmed Keresa Plantation supports freedom of association. At estate there is a local committee made up of workers representatives elected by workers. JCC meeting has been conducted for the internal stakeholder with the company management	Yes



Criterion	n / Indicator	Assessment Findings	Compliance
	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.	staffs The last meeting was conducted on the 28/3/2018. Interview of Staff and Workers also confirmed their awareness of freedom of association but there was no worker unions being formed at the moment.	
	- Major 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.	Inspection of a sample of personnel files at the estate confirmed recruits' ages were checked against their Identity Card for Malaysian workers or their passport in the case of foreign workers. Under-age persons were not observed at any of the work locations visited.	Yes
	- Major compliance -		
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.	Jiba estate has prepared a HSE Training Plan 2018 for KMSB & KPSB that lists the internal and external training courses scheduled for the year. In addition estate has a schedule of "on-the-job" training for the main tasks. The estate also maintained training records for individual staff and workers, including induction of new workers.	Yes
	- Major compliance -	Training carried out for 2018:	
		i) SHE Policy (31/07/2018)	
		ii) SDS Training (27/02/2018)	
		iii) Grievance Procedure (03/03/2018)	

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Criterio	n / Indicator	Assessment Findings	Compliance
		iv) Chemical Handling (27/03/2018) v) Scheduled Waste (07/04/2018)	
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.	Jiba estate has conducted training needs assessment prior to prepare the annual training plan for the year 2018 for all the employee groups including new and existing workers and staffs. Training programs are based on worker's competency requirements. Workers must be properly trained before assigned to the respective work units.	Yes
	- Major compliance -	On-site observation @ assessment will be carried out by field staff and assistant to monitor training effectiveness.	
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.	Continuous training program are planned and implemented covering all employees and contractors as per the documented training procedure.	Yes
	- Minor compliance -		
4.5 Princ	iple 5: Environment, natural resources, biodiversity and ec	osystem services	
Criterion	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 -	Keresa Plantations Sdn. Bhd. has an Environmental policy dated 27/12/2016 that has been signed by the Managing Director and environmental management plan with relevant to the applicable laws and regulations. Interviews of staff and workers found that the policy has been communicated and implemented.	Yes



Criterio	n / Indicator	Assessment Findings	Compliance
4.5.1.2	The environmental management plan shall cover the following: c) An environmental policy and objectives; d) The aspects and impacts analysis of all operations. - Major compliance -	The established environmental management plan has covered the environmental aspects and impacts based on Keresa Plantations & Mill. The Environmental Aspect & Impact assessment has been reviewed on 01/09/2018. The assessment is conducted according to the Procedure Manual – Identification of Environmental Aspects and Evaluations of Environmental Impacts Ref: KPSB 1/2012 dated 01/01/2012. The scoring and evaluation criteria provided in this Manual. Sample of assessment reviewed: Herbicides spraying activity which covers: 1. Mist 2. Chemical residue to water course 3. Chemical residue to land EFB mulching and decanter cake application which covers: 1. Decanter cake 2. EFB/cake spilled into water course 3. EFB/cake overflow into water course The mitigation plans related to the sample assessed above, has been reviewed and found satisfactory. Mitigation plans includes work procedures and training has been provided to the operators.	Yes



Criterio	n / Indicator	Assessment Findings	Compliance
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. - Major compliance -	The continuous monitoring as per initial implementation was implemented on timely basis where for each operating unit the planned programs were included in annual budgeting. Results of the programs that were monitored will determine operational changes whether have positive or negative environmental impacts. The visit confirmed that programs gave continuous improvement accordingly to the company.	Yes
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Keresa Mill's environmental improvement program also includes continual improvement plans. For example, waste management, water quality, soil erosion, biodiversity, pesticides and etc.	Yes
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.	Annual training program of the estate includes environmental awareness and compliance related trainings to the executives, staffs and workers. The training was conducted accordingly on 31/07/2018.	Yes
	- Major compliance -		
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	Environmental related matters were discussed during HSE meeting. The last HSE meeting was conducted on 20/10/2018. No issue related to environmental was raised during this meeting. Workers interview reveal that they are encouraged to discuss environmental issues with the management.	Yes



Criterio	n / Indicator	Assessment Findings	Compliance
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 including fossil fuel, electricity and energy efficiency in the operations over the base period.	The estate maintains records of energy usage, which is reported monthly to head office. The use of the fossil fuel against the FFB production is being monitored. Average for January 2018 to September 2018 : 5.12 litre/mt FFB	Yes
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. - Major compliance -	Jiba estate has estimation on total energy required. This estimation was compared to the actual usage by monthly and reported to the head office for monitoring.	Yes
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	Jiba estate has implemented buffalo assisted harvesting as to reduce usage of fossil fuel in field operation. The use of buffalo assisted harvesting is more cost effective compared to mechanize and diesel powered prime movers.	Yes
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 -	Based on documented pollution prevention plan (KM 4-1 Waste Register RSPO/ISCC), among the waste products identified and documented including general waste and scheduled waste. Sources of waste were from the mill, estates and housing area. Common waste	Yes

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Criterio	n / Indicator	Assessment Findings	Compliance
		identified including domestic waste and scheduled waste. For estates, its reusable and recyclable wastes identified included empty fertilizer bags and triple rinsed empty chemical containers. Organic biomass waste generated by estates including fronds and chipped fell palms.	
		Other specific activities such as mill maintenance and estate vehicle workshop generate few categories of scheduled waste such as SW 305, SW 306, SW 409 and SW 410. Clinic operation generated clinical waste.	
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: c) Identifying and monitoring sources of waste and pollution d) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products - Major compliance - 	Documented pollution prevention plan (KM 4-1) was emphasized in the pollution prevention plan where the site visit confirmed that the practice of reduce, reuse and recycle of materials has been implemented throughout the company mill and estates. Method of handling the domestic/general wastes are segregation at the collection point from offices and housing area before being disposed through landfill. For scheduled wastes, the handling was done according to the legal requirement where a scheduled waste store was constructed in each operating unit for storage.	Yes
		A company registered with DOE, Trienekens (Sarawak) Sdn Bhd (DOE #004932) was appointed to collect the scheduled waste from all the scheduled waste storage facilities within the company. Latest disposal was done on 28/05/2018 for SW305 & SW306 (C/N #KRS286B0118001) & SW410 (C/N #KRS286B0318001).	
		Clinical waste from the clinic was disposed through Bintulu Specialist Hospital Sdn. Bhd. as the authorized clinical waste collection and	

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Criterior	n / Indicator	Assessment Findings	Compliance
		disposal contractor appointed by the company. Latest disposal was done on 05/09/2018.	
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 -	 SOP for scheduled waste dated 15/10/2009 was established. For scheduled wastes, the handling was done according to the legal requirement where a scheduled waste store was constructed in each operating unit for storage. A company registered with DOE, Trienekens (Sarawak) Sdn Bhd (DOE #004932) was appointed to collect the scheduled waste from all the scheduled waste storage facilities within the company. Latest disposal was done on 28/05/2018 for SW305 & SW306 (C/N #KRS286B0118001) & SW410 (C/N #KRS286B0318001). Clinical waste from the clinic was disposed through Bintulu Specialist Hospital Sdn Bhd as the authorized clinical waste collection and disposal contractor appointed by the company. Latest disposal was done on 05/09/2018. However, it was noted that the Medical Assistant (MA) transports the clinical waste to Bintulu Specialist Hospital for disposal. The disposal is not according to Guidelines on the Handling and 	Non- compliance
		Management of Clinical Waste in Malaysia 2009. Also not according to the Waste Management Procedure in Keresa Plantations Sdn Bhd & Keresa Mill Sdn Bhd – 3.2.3.11 Clinical waste stored to be collected and disposed by the registered contractor under DOE.	



Criterio	n / Indicator	Assessment Findings	Compliance
		There is no approval from DOE to transport the clinical waste to Bintulu Specialist Hospital. Major NC issued.	
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 national programme on recycling of used HDPE pesticide containers.	confirmed that no empty chemical containers being disposed other	Yes
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.	Domestic wastes are being disposed at estate landfill and it's away from watercourse. Jiba Estate landfill located at field J9808.	Yes
Criterion	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. - Major compliance -	The established environmental management plan has covered the environmental aspects and impacts based on Keresa Plantations & Mill. The Environmental Aspect & Impact assessment has been reviewed. The assessment is conducted according to the Procedure Manual – Identification of Environmental Aspects and Evaluations of Environmental Impacts Ref: KPSB 1/2012 dated 01/01/2012. The scoring and evaluation criteria provided in this Manual. Jiba estate has	Yes



Criterio	n / Indicator	Ass	sessment Findings		Compliance
		done environmental impace activities within the estate	ct and aspect identification i	involving all the	
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -		ent plan include assessment operation such as waste, ai		Yes
Criterion	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: g. Assessment of water usage and sources of supply. h. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities. i. 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.). j. 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. 			Yes	

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Criterio	n / Indicator	A	ssessment Findings		Compliance
	 k. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented. I. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually. Major compliance - 	samples from 7 sampling the estate including Sg. Ji Sample analyses were do Sampled analysis report NREB/6-1/2G/6) shown to NWQSM and the results The result for water anal	20 meters 10 meters 5 meters 1 the river water monitoring points of river and streams riba, Sg. Semerah, Sg. Jampan ne every 3 months by ESI San (Report period of April – Jutthat analysis were done agai were in-compliance with the salysis which was done on 29/0 pown all the parameters were were sales	running through g and Sg. Besal. npling Sdn. Bhd. in 2018; Ref. # nst Class IIA of standard. 06/2018 (Report	
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance -	There were no construc rivers or waterways pass	tion of bunds, weirs and daiing through an estate.	ms across main	Yes
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). - Minor compliance -	road side drains and e	n includes rain water harvest etc. For housing complex, cleaning housing compound a	the rain water	Yes



Criterio	n / Indicator	Assessment Findings	Yes
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:c) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly	Keresa Plantations had engaged a consultant (Wild Asia) in 2009 to conduct a biodiversity assessment of the land at the Estate as well as preparation of site-specific short-term and long-term HCV Management Plans. The report for Environmental and Biodiversity Review dated May 2010 by Wild Asia was sighted. There was no HCV and rare, threatened, or endangered species being identified within	
	affected by the grower(s) activities.	the estate area.	
	 d) Conservation status (<i>e.g.</i> 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 -		
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:	There was no HCV and rare, threatened, or endangered species being identified within the estate area.	Yes
	 a) Ensuring that any legal requirements relating to the protection of the species are met. 	No illegal hunting signages are prominently erected at the estate entrance and other strategic area and awareness training has been given to workers and other stakeholders.	
	 b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts. 		
	- Major compliance -		



Criterior	n / Indicator	Assessment Findings	Compliance
4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.	There was no HCV and rare, threatened, or endangered species being identified within the estate area.	Yes
Criterion	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.	Keresa Plantations has established and implemented Best Management Practice (KP 2) approach through its standard operations and procedures (KP2-4 SOPs –Field Policy Manual).	Yes
	- Major compliance -	Under its conservation measures chapter entitled Environment Conservation (SOP # 7.iii; version 2 dated 1 Jan 2009), all mitigations measures for plantation activities including land preparation or replanting shall be in compliance with the approved Environment Impact Assessment (EIA) by Natural Resource and Environmental Board of Sarawak.	
		This is including Zero Open Burning practices where the visit to the field and facilities confirm that the company are in compliance of its Zero Open Burning policy.	
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.		Yes
	- Major compliance -		



Criterio	n / Indicator	Assessment Findings	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. - Major compliance -	Not applicable for Jiba estate.	Yes
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	Not applicable for Jiba estate. Currently, there is no replanting at Jiba Estate.	Yes
4 6 Princ	iple 6: Best Practices		
Criterion	4.6.1: Site Management		
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	Keresa Plantations has well established management systems for monitoring and control of best practice implementation at its estate. This includes the programme of regular internal audits by TQM and agronomist for maintaining and improving the production. Fertilizer recommendation for 2018 was made available. Date of the last visit as follows:	Yes
		TQM unit visit: 18-19/4/17	
		Agronomist visit: 26-28/9/2017	
		SHO visit, 18/5/18, safety workplace inspection 11/8/18.	
		TQM visit (monthly) 7/9/18 (J9706, J9707)	

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Criterion / Indicator		Assessment Findings	Compliance
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.	Jiba Estate has overlain a topographic map on the soil map to identify areas of potential erosion risk at Jiba Estate. The estate has identified steep areas for setting aside as conservation areas when replanting is due. Inspection of field conditions at estate showed well established and maintained groundcover vegetation.	Yes
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	Inspection of field conditions at sloping areas and terraces, found stacking of pruned fronds along the contour for protection against soil erosion was relatively consistent.	Yes
Criterion	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. - Major compliance -	Keresa Plantations has implemented a management system for monitoring and reporting of performance against production targets for achieving long-term economic and financial viability.	Yes
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 1997 and the next replanting would be in 2020. Total 523.92 ha will be replanted.	Yes
	- Major compliance -		



Criterio	n / Indicator	Assessment Findings	Compliance
4.6.2.3	 The business or management plan may contain: i) Attention to quality of planting materials and FFB j) Crop projection: site yield potential, age profile, FFB yield trends k) Cost of production : cost per tonne of FFB l) Price forecast m)e) Financial indicators : cost benefit, discounted cash flow, return on investment - Major compliance - 	Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains FFB yield, costs of production, etc. It also includes environment, social (workers and staffs welfare), and health and safety component and associated capital expenditure for improvement of smallholder schemes.	Yes
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 -	Keresa Plantations monitored the estate performance against the targets. It also recommends changes to the plans if necessary.	Yes
Criterion	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 -	The pricing method has been clearly stated in the contract and contractors are explained on the term of contracts prior to the signing of contract. Refer to contract dated 1/5/18 under Unify Services for transportion of FFB, fertilizer and workers.	Yes



Criterion / Indicator		Assessment Findings	Compliance
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Sample contract and payment record verification together with interviews of suppliers and contractor found the payments has been made as per contract. Sampled Contractor (Unify Services for transport of FFB, fertilizer and workers). Refer to tax invoice #0153 dated 30/9/2018 paid in timely manner.	Yes
Criterion	4.6.4: Contractor		
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	Keresa plantation has initiated the MSPO awareness to all its contractors. Latest MSPO awareness briefing to contractors was conducted on 11/8/17 by TQM Team. Interview with the contractors found that they understand on the MSPO requirements.	Yes
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor Major compliance -	Keresa Plantation has prepared a standard contract for all the contractors. The signed copy of the contract available at the estate office. Sample of contract agreement for transportion of FFB, fertilizer and workers under Unify Service dated 1/5/18.	Yes
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	Keresa Plantation has no objection to allow BSI auditors to verify the assessment through physical inspection if required.	Yes
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the		Yes

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Criterion / Indicator	Assessment Findings	Compliance
contractor, by checking and signing the assessment of the contractor for each task and season contracted. - Major compliance -	payment was made. Sampled Contractor (Unify Services for transport of FFB, fertilizer and workers). Refer to tax invoice #0153 dated 30/9/2018 paid in timely manner.	
4.7 Principle 7: Development of new planting Not applicable since there is no new planting area at Sujan Estate		

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



Criterio	n / Indicator	Assessment Findings	Compliance
4.1 Princ	iple 1: Management commitment & responsibility		
Criterion	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 company has initiated the implementations of MSPO requirements. MSPO Policy has been established and signed by Senior Group General Manager dated April 2015.	Yes
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 established policy has emphasized on the commitment to sustainable development and continuous improvement with the objective of improving the milling and estate operation.	Yes
Criterion	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 -	Annual MSPO internal audit was carried on 31/3/2017 concurrently with RSPO/ISCC elements for Keresa Mill. Audit covered both documentation and field operation for the estate. There were 8 Major and 1 Minor NCs raised by Internal Auditors. Audit report was available with the summary of findings for each respective work units.	Yes
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. - Major compliance -	Internal audit procedure was established and effectively implemented. The procedure was reviewed by the management to include the competency requirement for MSPO internal auditor. Internal Audit was led by Ms Winnie Siman where she was attended the MSPO2530:2013 awareness and internal auditing with SIRIM STS on 11-12/4/2017.	Yes



Criterio	n / Indicator	Assessment Findings	Compliance
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	Internal audit report dated 31/3/2017 was made available for management review.	Yes
Criterion	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. - Major compliance -	Management Review Procedure (dated September 2015) was established. MSPO management review was carried out on 18/5/17. All pertinent elements for MSPO implementation has been reviewed and presented to top management.	Yes
Criterion	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. - Major compliance -	TQM has worked with Mill to review and update the social and environmental aspects and impacts risk registers and to develop improvement plans. The Mill has been working with the Estates and outside suppliers to improve FFB quality and the OER which is an important indicator of processing efficiency. Furthermore, the mill completed the construction of Gasifier to reduce EFB produce by mill and convert it to value added product (bio char) and still under commissioning. The mill is also in progress on modification of oil room vertical clarifier and modification of sterilizer.	Yes Yes



n / Indicator	Assessment Findings	Compliance
The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.	The Mill has optimised the use of steam turbines for generating electricity, which has reduced the dependence on the usage of non-renewable fossil fuel. Biogas plant is in progress selection of contractor.	Yes
- Major compliance -		
ciple 2: Transparency		
4.2.1 – Transparency of information and documents relevant to MSPO I	requirements	
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.	Keresa Plantation & Mill has maintained records of requests and responses, Land titles/user rights, Safety and health plans, Plans and impact assessments relating to environmental and social impact, Plans for pollution prevention, Records of complaints and	Yes
- Major compliance -	grievances, Plans for continuous improvement and make available upon request.	
The 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.	Keresa mill holds copies of each of the management documents that are required to be publicly available. Copies of the document such as Plans and impact assessments relating to environmental and social impact, Plans for pollution prevention, records of	Yes
- Major compliance -	complaints and grievances were available on request. Keresa policy is to make documents and copies of the document publicly available on request, except those relating to commercial confidentiality	
	 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 - iple 2: Transparency 2.1 – Transparency of information and documents relevant to MSPO 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. Major compliance - The 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. 	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. The All has optimised the use of steam turbines for generating electricity, which has reduced the dependence on the usage of non-renewable fossil fuel. Biogas plant is in progress selection of contractor. • Major compliance - information and documents relevant to MSPO requirements 2.1 - Transparency Keresa Plantation & Mill has maintained records of requests and responses, Land titles/user rights, Safety and health plans, Plans and impact assessments relating to environmental and social impact, Plans for pollution prevention , Records of complaints and grievances, Plans for continuous improvement and make available upon request. The 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. Keresa and impact assessments relating to environmental and social impact, Plans for pollution prevention , records of the document such as Plans and impact. Assessments relating to environmental and social impact, Plans for pollution prevention request. The 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. Keresa mill holds copies of each of the management documents that are required to be publicly available. Copies of the document and social impact, Plans for pollution prevention, records of compliants and grievances were available on request. Keresa policy is to make documents and copies of the document publicly available.<

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Criterio	n / Indicator	Assessment Findings	Compliance
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	Keresa Plantation & Mill has established and implement Complaints & Grievances Procedure (Ref. SOC 3.2, Version 1) that define the responsibilities and actions required for receiving, recording and responding to enquiries and requests from internal and external stakeholders. The Mill has implemented the "Communication and Consultation Management guidelines" as evidenced by the maintenance of filing systems for recording written requests for assistance and information. Timeline to disclose within 3 working days and inform in writing within 3 working days. Inspection of a sample of records found that requests for information were received only from Government Departments (DOE, DOSH, MPOB) and request mostly from workers fro house repair.	Yes
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 -	The TQM Executive (Alicesa Anak Ramba) has been appointed as Social Management Representative for internal and external stakeholders. The responsibilities have been stated in the appointment letter dated 01/01/2017. Interviews with Stakeholders confirmed that Keresa has an open approach to communication with staff, workers and local communities.	Yes
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. - Major compliance -	Stakeholder list available that include the supplier, contractor, smallholders, external stakeholders plantation, villagers & government agency such as DOSH, MPOB, DOE, Labour department & etc. For internal stakeholder, JCC meeting was used to collect feedback. The action request has been recorded and track by Ms Alicesa. Request from government agency was by visit log	Yes

Criterior	n / Indicator	Assessment Findings	Compliance
		book such as MPOB, DOE and DOSH. The action has been taken accordingly and recorded.	
		Meeting with long house leader, smallholder and MPOB was carried out on 17/10/18. The intent of meeting is to promote MSPO certification to all smallholders under SPOC (Sustainable Palm Oil Cluster) group certification.	
		Joint consultative committee (JCC) meeting, internal stakeholder meeting that involve worker representative and chaired by mill manager. Last meeting was conducted on 26/9/18. All issued has been discussed with current action plan has been established.	
Criterion	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.	Procedures are controlled documents and controlled and updated by TQM Department. These procedures are current and include all elements of the traceability for controlling the receipt, sale and dispatch of palm products.	Yes
	- Major compliance -		
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system.	TQM has conducted internal inspections on compliance with the traceability system through the monthly official report. MPOB reports (EL) MF4A, (EL) MF 4 and MPOB PX-4 MF dated 5 th October 2018 was verified.	Yes
4.2.3.3	The management shall identified and assign suitable employees to	The TQM Executive has overall responsibility for the traceability activities – planning and executing sales of CPO & PK, aspects	Yes

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Criterio	n / Indicator	Assessment Findings	Compliance
	implement and maintain traceability system.	of FFB receipts, processing and shipping of palm products.	
	- Minor compliance -	Interview with the TQM Executive confirmed his knowledge of the MSPO traceability requirements.	
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -	Inspection of records confirmed these were updated daily. There were procedures on the record keeping which applicable to MSPO in the future. Records of storage, sales, delivery or transportation of crude palm oil and palm kernel was verified such as weighbridge ticket & daily mill report with storage record of CPO and PK is monitored daily by laboratory stock record. Sample of FFB, CPO and PK delivery records checked:	Yes
		Supplier: SS2-Sujan Stapang Estate 2, ticket# 108557, vehicle: QSV3181, nett weight: 11.76 mt	
		Supplier: Aling – Aling AK Kam, ticket# 108521, vehicle: QTL8195, nett weight: 2.0 mt	
		Supplier: Wajang Estate S/B, ticket# 108493, vehicle: QTN1151, nett weight: 5.64 mt	
		Palm Kernel (PK)	
		Buyer: Bintulu Edible Oil Sdn Bhd, ticket# 006737, vehicle: QKS3632, nett weight: 28.6 mt, commodity: normal (non-certified)	
		Buyer:SOP Bintulu Oils Sdn Bhd, ticket# 006740, vehicle: QTM 8785, nett weight: 40.920 mt, commodity: normal (non-certified).	
		Identification of commodity type based on stamping (ISCC /RSPO) and for nomal without stamping.	



Criterio	n / Indicator	Assessment Findings	Compliance
Criterion	4.3.1 – Regulatory requirements		
4.3.1.1	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations. - Major compliance -	Keresa Mill has maintained the systems for documentation, checking and assessment of legal compliance with applicable laws and regulations. Inspection of records showed that the Keresa Mill has maintained legal compliance with statutory requirements.	Yes
		Sample of Permit and license sighted were :	
		i) MPOB license #510557004000; validity period 01/04/2018 to 31/03/2019 for 275,000MT per year	
		ii) Diesel license (28,135 Ltr), BLESS #BL22018039228, serial #Q000913 valid from 10/10/2018 until 09/10/2019.	
		iii) Mill DOE license #003095 and compliance schedule JPKKS_Bintulu/2018/003095A; validity 01/07/2018 to 30/06/2019 for 60 MT FFB/hr and method of POME discharge on waterways. (BOD below 50ppm).	
		iv) Fire Certificate, serial #305319, No. JBPM: SK/7/33/2015 valid until 12/12/2018.	
		v) Certificate of Fitness and Inspections validity	
		• SW PMT 2004 valid until 07/04/2019	
		• SW PMT 8299 valid until 05/12/2019	
		• SW PMT 5391 valid until 07/04/2019	
		• SW PMD 469 valid until 11/06/2019	
		• SW PMD 1131 valid until 07/04/2019	

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Criterio	n / Indicator	Assessment Findings	Compliance
		Competent person :	
		i) Steam engineer – P. Shailendran (144/2008) Grade 1.	
		ii) Engine driver – Suring Anak Laroh (SW/06/Est/01/7) Grade 1.	
4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirements register. - Major compliance -	A Legal Compliance procedure has been established (KP 16 Mechanism for ensuring legal compliance dated 15 Mar 2010). All operating units have Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements.	Yes
		TQM sustainability department have reviewed and updated the LORR at the mill on 02/10/2017.	
		All the new legal requirements were include in the legal register accordingly:	
		i) Minimum Wages Order 2016	
		ii) Factory Machinery Act 1970, Person In-Charge Regulations Amendment 2014	
		iii) Environment Quality, Clean Air Regulation 2014	
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.	Tracking system available to identify changes in the relevant regulations through head office, website information and the	Yes
	- Major compliance -	information are communicated from the Group Head Office.	
		On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operations. Tracking system on any changes in the law been well implemented.	

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Criterio	n / Indicator	Assessment Findings	Compliance
4.3.1.4	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements. - Minor compliance -	The person responsible has not effectively monitored compliance to the Sarawak Labour Ordinance (Cap 67), Section 109 (Payment of wages). Salary payment is by cash and paid at mill's office and paid after 7th of the following month. Checked 3 months payment form July – September 2018:	Non- compliance
		i) September 2018: Cash received on 9/10/18, refer to delivery note# 85353 by Guard and Escort Services (S) Sdn Bhd. Payment is made on 9/10/18 with employees acknowledgement in the check roll report GPR74BMW	
		ii) August 2018: Cash received on 12/9/18, refer to delivery note# 75282 by Guard and Escort Services (S) Sdn Bhd. Payment is made on 9/10/18 with employees acknowledgement in the check roll report GPR74BMW	
		iii) July 2018: Cash received on 10/8/18, refer to delivery note# 84126 by Guard and Escort Services (S) Sdn Bhd. Payment is made on 10/8/18 with employees acknowledgement in the check roll report GPR74BMW.	
		Previous NC was not effectively close thus upgraded to major NC.	
Criterion	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. - Major compliance -	Keresa Mill operation is on lease land. There are documents in place showing legal ownership or lease and a history of land tenure. As reported during the last assessment, estate was developed on State Lease Land, issued by Department of Land and Survey; Bintulu Division dated 28 December 1996 for 99 years (between 01 January 1981 and 01 January 2080) over an area of 6,023 ha in Lot No. 1	Yes
		Block 17 Lavang Land District, Bintulu Sarawak.	

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Criterio	n / Indicator	Assessment Findings	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. - Major compliance -	Keresa Mill operation is on lease land. There are documents in place showing legal ownership or lease and a history of land tenure. As reported during the last assessment, estate was developed on State Lease Land, issued by Department of Land and Survey; Bintulu Division dated 28 December 1996 for 99 years (between 01 January 1981 and 01 January 2080) over an area of 6,023 ha in Lot No. 1 Block 17 Lavang Land District, Bintulu Sarawak.	Yes
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	Keresa mill was within the perimeter of Keresa estate. The boundary between the mill and the estate was clearly separated using the perimeter fencing.	Yes
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 was no land disputes noted during the audit at Keresa Mill as the mill has the legal ownership documents which was under the Keresa Plantations Sdn. Bhd.	Yes
	- Minor compliance -		
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 -	There is no customary land or negotiated agreements within the Keresa Mill land area.	Yes
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	There was no customary land within the Keresa mill land area.	Yes



Criterio	n / Indicator	Assessment Findings	Compliance
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	Not applicable for Keresa Mill as there were no negotiation has occurred.	Yes
4.4 Princ	ciple 4: Social responsibility, health, safety and employment co	ondition	
Criterion	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 -	TQM department has conduct with the internal stakeholder on the 31/7/2014 using survey that includes the criteria of term & condition of work, social provision and safety & health. A summary report has been compiled and analysed.	Yes
		Seen the Social Impact Assessment of Keresa Plantation which involved small holders & Workers has been conducted on 2017. Worker survey (75 participants- Overall Keresa Plantation) has been conducted on 30/05/17 and small holders survey on June to July 2017 from 3 long houses that involved 21 participants. For positive impacts, the latest assessment was carried out on 19- 20/7/18 which covers 15 pertinent social aspect such as education facilities, CLC etc.	
		Seen the action request plan of JCC 2018 & smallholder meeting has been established after the meeting and the status of action will be updated on the following meeting where some of the action has been completed and some of the action was still in- progress. Session with long house leader @ <i>Tuai Rumah</i> and other external stakeholder was carried out on 17/10/18.	



Criterio	n / Indicator	Assessment Findings	Compliance
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 -	The Mill has established the procedure (Chapter 3:Complaints & Grievance Procedures dated: December 2009) to deal with complaints and grievances by using the complaint form. Sighted some of the complaint form at mill, mostly complaint for house repair.	Yes
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 -	Inspection of records at Mill indicated that written communications were replied promptly and the correspondence kept in file (KP5-19: Fail Cadangan/ Aduan/ Permintaan). Most of the complaint was on the repair request e.g. complaint dated 15/10/18 [house no.5/block A – no electricity, house no.4/block A – house lighting issue]	Yes
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - Minor compliance -	The Mill maintains 'complaint form' and 'maintenance and repairing report' for receiving and responding to requests and complaints from employees. No external stakeholders were received related on complaint and grievances. Review of the registers found there was no outstanding or unresolved grievance.	Yes
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.	Interview with stakeholders found that they are aware of the procedure and no pending issues.	Yes
	- Minor compliance -		



Criterio	n / Indicator	Assessment Findings	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.	Record review found that previous complaints and requests from 2009 were still available until the latest complaint records on October 2018.	Yes
	- Major compliance -		
Criterion	4.4.3: Commitment to contribute to local sustainable development		
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.	Keresa Plantations Sdn. Bhd. has taken the initiative to assist the smallholders such as providing technical assistant to obtain the RSPO certification. Apart from that, the plantation allows the local villagers to have the access of the road and provide business opportunity for the local in opening sundry shop at the linesite. Furthermore, the company also made contribution to the local longhouse for the festival celebration. The lastest contribution to long house is HDPE water tank for rain water harvesting programme in July 2018	Yes
Criterion	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 -	Keresa Mill has established Occupational Safety, Health and Hygiene Policy dated 17/10/2017 which was signed by the Managing Director. The OSH Plan 2018 was established to cover the housing inspection, OSH audit, training, workplace inspection, OSH meeting, medical surveillance, audiometric test, LEV etc. which was prepared by SHE Exec, TQM Unit.	Yes



Criterion	/ Indicator	Assessment Findings	Compliance
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. b) The risk of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: All employees involved are adequately trained on safe working practices; 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 identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. f) The management shall appoint responsible person(s) of trust shall 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 that affect their business 	Keresa Mill has an Occupational Safety, Health and Hygiene Policy that has been communicated to the staff and workers. On site supervisors and Mill assistant managers ensure the implementation of it. Sample of OSH activities carried out were: i) Audiometric test (Ref: GGOSH/PUA-KERESA/2018/01) was conducted on 13/06/2018 for 30 workers by Global Green OSH Services Sdn Bhd. The result shown that 2 workers was found STS and need to be retest within 3 months. Testing result was reviewed by OHD, JKKP HQ/08/DOC/00/427. ii) Medical surveillance was conducted accordingly for the Lab Sampler, Boiler men and Water Treatment Operator (04 workers) on 02/08/2018 by Medan Jaya Medical Clinic (HQ/08/DOC/00/206). Based on the report, it was found that all workers was found fit for work. The Mill reviewed the Safety Risk Assessment (HIRARC) for the main tasks. HIRARC register, latest review on 19/10/2018 was sighted. All activities i.e. department Reception, Sterilizer, Boiler, Oil clarification station, CPO despatch bay, Kernal Silo, workshop, Gasifier Plan and workshop have been identified and documented. HSE Training Plan 2018 for KMSB & KPSB was consistently implemented. The program 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,	Noncompliance

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Criterion / Indicator	Assessment Findings	Compliance
 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. h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees. i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite. j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals. - Major compliance - 	 workers working in confined space, In addition to specific training courses, safety briefings are given during muster to reinforce awareness, such as correct wearing of PPE. SDS for all the chemicals used are available at the store in Duallanguage (Bahasa Malaysia and English). Apart from that, various warning sign was seen throughout the factory area Observed at loading ramp, sterilizer station, engine room, boiler station and workshop adequate and appropriate protective equipment was provided. Latest PPE issuance was provide on 20/10/2018 for Safety Shoes. Keresa Mill follows the Keresa Plantations SOP for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labelling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. CHRA was conducted on 13/72017 at Keresa Mill by DOSH registered assessor, JKKP KIM127/453/6(33). LEV Report (Ref: HQ/14/JHII/00/193-2018/027) was conducted on 22/06/2018 by ESI Sampling Sdn Bhd. The management had been established the action plan based on the recommendation by the assessor. 	

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Criterion / Indicator	Assessment Findings	Compliance
	At the Mill, there is a designated OSH Coordinator who is responsible for organising safety training, meetings and investigation and reporting of accidents and Incidents.	
	Safety & Health Committee Chairman & OSH secretary –	
	Appointment of SHC – Mill Manager (Chairman): Mr. Shailendran A/L R. Palpanadan (27/11/2017), SHC secretary: Mr. Adderly Tie (27/11/2017).	
	Records were available confirming that quarterly OSH meetings had been held at the Mill.	
	Refer OHS meeting minutes :	
	OHS meeting – #2: dated 01/08/2018, #1: dated 06/03/2018.	
	The Mill has site specific Plans including maps showing assembly areas and up-to-date lists of emergency contacts with training conducted to communicate the Plan. Interviews of Mill staff and workers confirmed understanding of emergency response procedures.	
	First Aid Kits are provided at various work sites at the Mill. Verified on site visit location: Workshop and Laboratory.	
	However, the content of first aid kit was inadequate as per the Guidelines on First Aid in the Workplace (2nd Edition) by DOSH. eq. Missing scissors and expired eye lotion.	
	Not according to the Tatacara Kerja Selamat – Peti Kecemasan (1.3) Ubat-ubatan samaada dalam bentuk tablet, kapsul, suntikan	

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Criterio	n / Indicator	Assessment Findings	Compliance
		termasuk ubat titis telinga dan mata tidak dibenarkan disimpan di dalam peti kecemasan.	
		No evidence of recent inspection (frequency every 2 months) to confirm that it had been appropriately stocked.	
		Major NC issued.	
		All accidents are investigated and reported to Head Office. JKKP 8 was sent to DOSH on 11/01/2018.	
		i) Refer accident dated 11/10/2018 at sterilizer station. Investigation was done internally by SHEO.	
		ii) Refer accident dated 19/03/2018 at digester no. 1 station. Investigation was done internally by SHEO. JKKP 6 was sent to DOSH on 23/03/2018.	
Criterion	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 shall be signed by the top management and communicated to the employees.	The management has established a policy on good social ethics regarding human rights such as Equal Rights Policy, Prevention of sexual harassment & domestic violence in the workplace policy, freedom of association policy, etc. has been signed off by Managing Director of the group, dated 30/11/2016.	Yes
		The policy was communicated by displayed at the strategic location, induction & training, memo and meeting.	
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment	Keresa mill has established Equal Rights Policy, signed by Managing Director dated 1/12/09 to ensure equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.	Yes

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Criterio	n / Indicator	Assessment Findings	Compliance
	 regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. Major compliance - 	Inspection of a sample of pay records and interviews of staff and workers at the Mill did not identify any issues related to discrimination.	
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 is a contract and agreement for staff and workers including foreign workers and pay and conditions are documented and are above the industry minimum standard. Inspection of a sample of employee contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. Staff and Workers confirmed this during interview. Sampled Workers checked for September 2018 wages: a) Employee No.: E0772 b) Employee No.: E0792 c) Employee No.: E0714 e) Employee No.: E0765	Yes
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 -	Keresa Finance Department arranges contracts for the purchase of goods and services, including those with FFB suppliers. The contract clearly stated that the contractor must strictly follow all applicable national and ratified international laws. Interviews of contractors indicated that they understand their contracts. Further interview with the contractor's workers found	Yes

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Criterio	n / Indicator	Assessment Findings	Compliance
		that they were paid at least meeting the minimum wages requirement	
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.	Keresa Mill has a register of all staff and workers at the premise. The detail includes full name, gender, date of birth, date joined, job title. The basic wages, copy of passport and permit etc were maintained in the employee personnel file.	Yes
	- Major compliance -		
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.	There is a contract and agreement for staff and workers including foreign workers and pay and conditions are documented and are above the industry minimum standard. Inspection of a sample of employee contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker.	Yes
		a) Employee No.: E0772 (local, signed date 18/7/18)	
		b) Employee No.: E0692 (local, signed date 5/7/16)	
		c) Employee No.: E0700 (contract valid from 20/10/18 – 20/10/20)	
		d) Employee No.: E0714 (contract valid from 3/1/17- 3/1/19)	
		e) Employee No.: E0765 (contract valid from 4/4/18- 4/4/20)	
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.	The Keresa Mill has a "Punch Card" time recording system to monitor the working hours of its workers and staffs.	Yes
	- Major compliance -		



Criterior	/ Indicator	Assessment Findings	Compliance
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 Keresa Mill has obtained the overtime permit from labour department. Payslip of the workers and staff have been checked and verified that was within the allowed limit by labour department.	Yes
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 -	Sample payslips checked found the wages and overtime payments are documented in line with the employee contract & agreement and complies with Minimum Wage Order 2012 requirement of RM 920 monthly. Sampled Workers checked for September 2018 wages: a) Employee No.: E0772	Yes
		b) Employee No.: E0692c) Employee No.: E0700d) Employee No.: E0714	
		e) Employee No.: E0765	
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.	Interviews of local and foreign workers indicated satisfaction with the standard of housing and facilities. Electricity and water are provided without charges. Keresa provide transport for children to school.	Yes
	- Minor compliance -		



Criterion	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 -	Residents at all company housing have access to facilities established by the company, such as health clinic, sports field, crèche, and places of worship.	Yes
4.4.5.12	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	Keresa Plantations Sdn. Bhd. has established prevention of sexual harassment & domestic violence in the workplace policy and displayed at strategic location. Interviews of internal and external stakeholders confirmed awareness and understanding of the Policy.	Yes
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 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.	Interviews of staff and workers confirmed Keresa Mill Sdn. Bhd. supports freedom of association. Policy on Freedom of Association dated August 2010. Although there were no Labour Unions, workers and staff are represented in Joint Consultative Committee (JCC) which was established since September 2010. Members are elected from representatives of every division including foreign workers. Regular meetings are held every three months. Latest meeting was held on 26/9/18.	Yes
	- Major 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.	Inspection of a sample of personnel files at the Mill confirmed recruits ages were checked against their Malaysian Identity Card or their passport in the case of foreign workers. Under-age persons	Yes
	- Major compliance -	were not observed at any of the work locations visited.	



Criterio	n / Indicator	Assessment Findings	Compliance
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.	Keresa Mill has prepared a HSE Training Plan 2018 for workers and contractors that lists the internal and external training courses scheduled for the year.	Yes
	- Major compliance -	Training plan for 2018 for Keresa Mill as follows:	
		i) Safety Alert Briefing (11/10/2018)	
		ii) Stand down Tool Box for Incident (11/10/2018)	
		iii) Confined Space Training (01/08/2018)	
		iv) Scheduled Waste Training (07/04/2018)	
		v) Grievances Procedure Training (03/03/2018)	
		SOP training for mill work unit	
		i) SOP Empty Bunch Press/Thresher (13/02/2018)	
		ii) SOP Sterilizer/Press/Digester (14/02/2018)	
		Seen the training records of the above sampled training have been maintained accordingly.	
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.	Keresa Mill has prepared an annual HSE Training Plan 2018 based on the training needs. This includes the internal and external training courses scheduled for the year.	Yes
	- Major compliance -		
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	Continuous training program is planned and implemented covering all employees and contractors as per the documented training procedure.	Yes



Criterio	n / Indicator	Assessment Findings	Compliance
	and responsibility in accordance to the documented training procedure.		
	- Minor compliance -		
4.5 Princ	ciple 5: Environment, natural resources, biodiversity and ecosy	ystem services	
Criterion	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. - Major compliance -	Keresa Mill has an Environmental policy dated 27/12/16 that has been signed by the Managing Director and the environmental management plan with relevant to the applicable laws and regulations. Interviews of staff and workers found that the policy has been communicated and implemented.	Yes
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	The established environmental management plan has covered the environmental aspects and impacts based on Keresa Plantations & Mill.	Yes
	- Major compliance -	Sighted the documented environmental impact assessment established based on Procedure Manual Ref. No.: 1/20012; Doc. No.: Aspect Impact 1/2012; Identification of Environmental Aspects and Evaluation of Environmental Impacts.	
		It was sighted for Keresa Mill, the Mill Environmental Significant Aspect (E 4.3.3 .1 Env. Aspect Register V2; dated May 2010) amended Sep 2011 was last reviewed on 09/02/2018 for the Gasifier roofing and flooring construction.	



Criterio	n / Indicator	Assessment Findings	Compliance
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 continuous monitoring as per initial implementation was implemented on timely basis where for each operating unit the planned programs were included in annual budgeting. Results of the programs that were monitored will determine operational changes whether have positive or negative environmental impacts. The visit confirmed that programs gave continuous improvement accordingly to the company.	Yes
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Keresa Mill's environmental improvement program also includes continual improvement plans. For example, compliance to the POME discharge and stack emission, waste management, water quality and etc.	Yes
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.	Annual training program of the mill includes environmental awareness and compliance related trainings to the executives, staffs and workers.	Yes
	- Major compliance -		
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -	Environmental related matters were discussed during HSE meeting. The last HSE meeting was conducted on 01/08/2018. No issue related to environmental was raised during this meeting. Workers interview reveal that they are encouraged to discuss environmental issues with the management.	Yes
Criterion	4.5.2: 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	Utilization of fossil fuels (diesel for genset) was monitored and control through stores stocks and materials checking reported on monthly basis. Effective maintenance plan and productive	Yes

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Criterio	n / Indicator	Assessment Findings	Compliance
	to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period - Major compliance -	operation plan for genset including regular servicing of gensets as well as efficient operation of FFB process to fully utilize the free source of fuel i.e. biomass (fiber and shell) were implemented. The quantity of biomass also monitored to achieve the expected percentage of fiber ($60 - 70\%$) and shell (3%) quantities being consumed.	
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. - Major compliance -	Keresa Mill has estimation of total energy required. This estimation was compared to the actual usage by monthly and reported to the head office for monitoring.Fossil fuel usage recorded at 0.77 liter per FFB processed (todate Sept 2018).Electricity usage recorded at 2.85 kWh per FFB processed (todate Sept 2018).	Yes
4.5.2.3	The use of renewable energy should be applied where possible Minor compliance -	Utilization of fossil fuels (diesel for genset) was monitored and control through stores stocks and materials checking reported on monthly basis. Effective maintenance plan and productive operation plan for genset including regular servicing of gensets as well as efficient operation of FFB process to fully utilize the free source of fuel i.e. biomass (fiber and shell) were implemented. The quantity of biomass also monitored to achieve the expected percentage of fiber ($60 - 70\%$) and shell (3%) quantities being consumed.	Yes

Criterio	n / Indicator	Assessment Findings	Compliance
4.5.3.1	All waste products and sources of pollution shall be identified and documented Major compliance -	Based on documented pollution prevention plan (KM 4-1 Waste Register RSPO/ISCC), among the waste products identified and documented including general waste and scheduled waste. Sources of waste were from the mill, estates and housing area. Common waste identified including domestic waste and scheduled waste. Other specific type of waste generated by the mill is organic (biomass) waste which is also a source of renewable energy consists of fibres, shells, empty fruit bunches, boiler ashes and decanter solids.	Yes
		Other specific activities such as mill maintenance and vehicle workshop generate few categories of scheduled waste such as SW 305, SW 306, SW 409 and SW 410.	
4.5.3.2	 avoid or reduce pollution. The waste management plan should include measure for: a) Identifying and monitoring sources of waste and pollution. b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products. - Major compliance - 	Documented pollution prevention plan (KM 4-1) was emphasized in the pollution prevention plan where the site visit confirmed that the practice of reduce, reuse and recycle of materials has been implemented throughout the company mill and estates. Method of handling the domestic/general wastes are segregation at the collection point from offices and housing area before being disposed through landfill (Sujan estate). For scheduled wastes, the handling was done according to the legal	Yes
		requirement where a scheduled waste store was constructed in each operating unit for storage.	
		A company registered with DOE, Trienekens (Sarawak) Sdn Bhd (DOE #004932) was appointed to collect the scheduled waste from all the scheduled waste storage facilities within the company. Latest	

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n / Indicator	Assessment Findings	Compliance	
	disposal was done on 28/05/2018 for SW305 & SW306 (C/N #KRS286B0118001) & SW410 (C/N #KRS286B0318001).		
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 -	SOP for scheduled waste dated 15/10/2009 was established. For scheduled wastes, the handling was done according to the legal requirement where a scheduled waste store was constructed in each operating unit for storage. A company registered with DOE, Trienekens (Sarawak) Sdn Bhd (DOE #004932) was appointed to collect the scheduled waste from all the scheduled waste storage facilities within the company. Latest disposal was done on 28/05/2018 for SW305 & SW306 (C/N #KRS286B0118001) & SW410 (C/N #KRS286B0318001). Method of handling the domestic/general wastes are segregation	y to the legal onstructed in vak) Sdn Bhd ed waste from mpany. Latest SW306 (C/N 01).	
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.	at the collection point from offices and housing area before being disposed through Sujan estate landfill.	Yes	
	Mathad of handling the demostic/general wastes are cogregation		
Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse Minor compliance -	at the collection point from offices and housing area before being disposed through estate landfill.	Yes	
	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 - 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. - Major compliance - Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.	disposal was done on 28/05/2018 for SW305 & SW306 (C/N #KRS286B0118001) & SW410 (C/N #KRS286B0318001). 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) SOP for scheduled waste storage. - Major compliance - A company registered with DOE, Trienekens (Sarawak) Sdn Bhd (DOE #004932) was appointed to collect the scheduled waste from all the scheduled waste storage facilities within the company. Latest disposal was done on 28/05/2018 for SW305 & SW306 (C/N #KRS286B0118001) & SW410 (C/N #KRS286B0138001). 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. - Major compliance - Method of handling the domestic/general wastes are segregation at the collection point from offices and housing area before being disposed through sujan estate landfill. Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. Method of handling the domestic/general wastes are segregation at the collection point from offices and housing area before being disposed through estate landfill.	



Criterio	n / Indicator	Assessment Findings	Compliance
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. - Major compliance -	Based on the assessment of all polluting activities as of the Environment Aspect and Impact assessment (KM 4-1 Baseline Waste ID), identified source was boiler chimney. Current monitoring was through online boiler smoke density and alarm and six-monthly boiler stack monitoring of dust particulate. Sampled monitoring report latest done on 21/08/2018 by ESI Sampling Sdn. Bhd. (Report ref. # KMSB/ST-B1&2/2018/2) for	Yes
		boiler chimney no. 1 & 2. Result for boiler chimney no. 1 shown the stack emissions are within limit at 0.357 g/Nm3. Result for boiler chimney no. 2 shown the stack emissions are within limit at 0.359 g/Nm3.	
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	Based on KM 4-1 Baseline Waste ID, main source of significant pollutants and greenhouse gas (GHG) identified was methane (CH4) emission through POME treatment. The company are in process of obtaining proposals to construct methane capture facilities in POME treatment pond. Other less significant GHG emissions identified including COx, SOx and NOx from various sources including fossil fuel, chemical and fertilizer consumptions.	Yes
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.	Palm Oil Mill Effluent (POME) treated through anaerobic pond treatment system where the licensed limit for final discharge BOD was increased by DOE from 20mg/l to 50mg/l for latest issued licensed. Regular monitoring was conducted by the mill by taking	Yes

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Criterior	ı / Indicator	Assessment Findings	Compliance
	- Major compliance -	the sample of waste water in final discharge point and water at the upstream and downstream of the river.	
		Latest sample analyses results for the month of July, August and September 2018 shown that the mill has consistently met the requirement for BOD limit.	
		Sample: ESI Laboratory Sdn Bhd (Lab #ELK/KMSB/02/252/18) Certificate of analysis ref. #KMSB/14-09/252 dated 04/10/2018 for sample taken on 14/09/2018).	
		Result:	
		BOD3 final discharge = 5.9mg/l	
		BOD3 river (Sungai Sujan) upstream = <2mg/l	
		BOD3 river (Sungai Sujan) downstream = <2mg/l	
Criterion	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.b) Monitoring of outgoing water which may have negative impacts	Keresa Plantations Sdn Bhd – Keresa Mill Sdn Bad Water Management Plan (WMP) dated 20/07/2017. Including specific parameters for WMP to promote efficient use of water and meet water conservation requirements under Sarawak Water Resource Enactment 1998 and Interim National Water Standards for Malaysia.	Yes
	into the natural waterways at a frequency that reflects the mill's current activities.	Water management plan (KP 2-201 dated June 2010) involved water consumption management and quality monitoring which	
	c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application,	inclusive of drinking water monitoring and discharge water monitoring. Drinking water monitoring was done as per National	

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Criterio	n / Indicator	Assessment Findings	Compliance
	maintenance of equipment to reduce leakage, collection of rainwater, etc.).	Water Quality Standard Malaysia (NWQSM) by Kementerian Kesihatan Malaysia through its Pejabat Kesihatan Bahagian Bintulu.	
	- Major compliance -	Sample analyses were done every 3 months by ESI Sampling Sdn. Bhd. Sampled analysis report (Report period of April – Jun 2018; Ref. # NREB/6-1/2G/6) shown that analysis were done against Class IIA of NWQSM and the results were in-compliance with the standard.	
		The result for water analysis which was done on 29/06/2018 (Report No: KPSB/08-06/028) at Keresa Mill shown all the parameters were within the limits.	
		Water consumption for firefighting, housing, boiler and mill was monitored monthly basis. Total average water consumption for period January – September 2018 at Keresa Mill was at 377,544.00 m3.	
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.	Palm Oil Mill Effluent (POME) treated through anaerobic pond treatment system where the licensed limit for final discharge BOD was increased by DOE from 20mg/l to 50mg/l for latest issued	Yes
	- Major compliance -	licensed. Regular monitoring was conducted by the mill by taking the sample of waste water in final discharge point and water at the upstream and downstream of the river.	
		Latest sample analyses results for the month of July, August and September 2018 shown that the mill has consistently met the requirement for BOD limit.	

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Criterio	n / Indicator	Assessment Findings	Compliance
		Sample: ESI Laboratory Sdn Bhd (Lab #ELK/KMSB/02/252/18) Certificate of analysis ref. #KMSB/14-09/252 dated 04/10/2018 for sample taken on 14/09/2018).	
		Result:	
		BOD3 final discharge = 5.9mg/l	
		BOD3 river (Sungai Sujan) upstream = <2mg/l	
		BOD3 river (Sungai Sujan) downstream = <2mg/l	
4.6 Princ	iple 6: Best Practices		
Criterion	4.6.1: Mill Management		
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.	Kerasa Mill has established a system for monitoring and control of best practice implementation. This includes the programme of regular internal audits by Mill Advisory, TQM and Inspectors for maintaining and improving the production.	Yes
		 SOP for Keresa Plantation – January 2011(KP 2-5) & Safe Working Procedure for mill operation – established 17/10/12, rev1/2012. Consist of: i) FFB Reception Station ii) Steriliser Station iii) Press Station iv) CPO & PK despatch v) ETP vi) EFB management vii) Security and safety viii) Store and offices ix) Workshop 	

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Criterio	n / Indicator	Assessment Findings	Compliance
4.6.1.2	All palm oil mills shall implement best practices	 x) Boiler Station xi) Tractor/shovel and forklift xii) Hydrant pump xiii) Electrical work Noted SOP review for Sterlization dated 18/8/17 and working at height dated 21/1/18. There was no changes for the other SOPs. Mill advisory report by Ir. Telochan Singh dated 8/10/18 was sighted. The report is mainly on mill efficiency, performance, utilization, legal compliance as well as overall safety and health requirements. External Mill Advisor and TQM department inspect and report on 	Yes
	- Major compliance -	the operations on annual basis. The on-site managers develop Action Plans from the Advisory Reports for improvement of the operations. Review of Advisory Reports, Action Plans and site inspections confirmed consistent records of implementation of SOPs. This to ensure that performance is on track and best practices being consistently implemented.	
Criterion	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.	Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains FFB yield, CPO, OER, and KER, costs of production, milling utilisation, FFB pricing etc. It also includes	Yes
	- Major compliance -	environment, social (workers and staffs welfare), and health and safety component and associated capital expenditure for	

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Criterio	n / Indicator	Assessment Findings	Compliance
Criterion	4.6.3: Transparent and fair price dealing	 improvement of smallholder schemes. CAPEX gazetted for 2018: i) ESP @ VORSEP for boilers with TPM sensor (Clean Air Regulation 2014 compliance by June 2019) ii) NIR machine for lab testing equipment (reduction of solvent usage/ exposure to workers) iii) New housing block for workers (4 units) iv) New prime mover (shovel) for reception/loading ramp station 	
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented Major compliance -	Keresa mill offers FFB pricing as per MPOB guidelines and mills average OER. The pricing method has been clearly stated in the contract and agreed by the FFB supplier.For other services, details of contract mention under schedule A (scope of work, company information, validity period) and schedule B more on the payment term, rates, variation orders, liability, compliance with law/safety management/insurance etc.	Yes
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	 Sample contract and payment record verification together with interviews of suppliers and contractor found the payments has been made as per contract. Eg: 1. FFB Supplier Agreement (04/2016), Goldenrise Sdn Bhd effective date 1/1/17. The payment was paid as per the agreement (interim payment by 20th day of delivery month based on FFB delivered from 1st to 15th of each delivery month) 2. CPO and PK transporter agreement, Soon Hup Transport (Sarawak) Sdn Bhd. dated 25/6/2018. Commence date: 1/7/18, expiry date: 20/6/20. The payment was paid as per the 	Yes

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Criterio	n / Indicator	Assessment Findings	Compliance
		agreement. Refer to tax invoice no. SHT/BTU/2018/176 dated 30/6/18.	
Criterion	4.6.4: Contractor		
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. - Major compliance -	Keresa Mill Sdn. Bhd. has initiated the MSPO awareness to all its contractors. Interview with the contractors found that he has understood on the MSPO requirements. A few sessions with contractors was done on 9,15 and 22/10/18 for the briefing on the RSPO awareness.	Yes
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor Major compliance -	Keresa Mill Sdn. Bhd. has prepared a standard contract for all the contractors. The signed copies of the contracts were available at the mill. Sample of contract, CPO and PK transporter agreement, Soon Hup Transport (Sarawak) Sdn Bhd. dated 25/6/2018 was sighted.	Yes
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	Keresa Plantations Sdn. Bhd. has no objection to allow BSI auditors to verify the assessment through physical inspection if required.	Yes



4.0 Assessment Conclusion and Recommendation:

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

Based on the findings during the assessment **Keresa Plantation** – **Keresa POM, Jiba and Sujan Estate** complies with the **MS 2530-3:2013** and **MS 2530-4:2013**. It is recommended that the certification of **Keresa Plantation** – **Keresa POM, Jiba and Sujan Estate** is approved.

Acknowledgement of Assessment Findings	Report Prepared by
Name:	Name:
Abdul Aziz bin Zainal Abidin	Mohamed Hidhir Zainal Abidin
Company name:	Company name:
Keresa Plantations Sdn. Bhd.	BSI Services Malaysia Sdn. Bhd.
Title:	Title:
Deputy General Manager	Lead auditor
Signature;	Signature:
St.	
Date: 30 1/03/2019	Date: 20/3/19



Appendix A: Assessment Plan

Date	Time	Subjects	(MH)	(KL)
Sunday 5/11/17	PM	Travelling to Bintulu via MH2746 (ETA:1900) (Stay at Hotel, Bintulu)	\checkmark	-
Tuesday 7/11/17	11:00	Audit Team (Kelvin) travelling to Bintulu via MH2742 (ETA:1045)Audit Team travelling to site	\checkmark	\checkmark
(Keresa POM)	13:30 14:00	 Opening Meeting: Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation). 	V	V
	14:00 15:00	 Keresa Palm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc. 	V	\checkmark
	15:00 16:30	 Document Review P1 – P6 (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 and P6 : Best practices 	V	\checkmark
	16:30 17:00	Interim Closing briefing	\checkmark	\checkmark
Wednesday 8/11/17 (Jiba Estate)	08:30 12:30	 Jiba 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. 	\checkmark	V
	12:30 13:30	- Lunch	\checkmark	\checkmark
	13:30 16:30	 Jiba Estate Document review P1 – P6 (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	\checkmark
	16:30 17:00	 Interim Closing Briefing 	\checkmark	\checkmark

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Thursday	8:30	_	Sujan Estate		√
9/11/17 (Sujan	12:00		Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc),	v	, v
Estate)			agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.		
	12:00 13:30	-	Lunch/Rest/Prayers	\checkmark	\checkmark
	13:30 16:30	-	Sujan Estate Document review P1 – P6 (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	\checkmark	V
	16:30 17:30	-	Interim Closing Briefing	\checkmark	\checkmark
Friday 10/11/17	8:30 12:00	-	Meeting with stakeholders at Keresa POM (Government, village rep, smallholders, Workers Leader, contractor etc.)	-	-√
(Keresa POM)	8.30 12:30	-	Document Review P1 – P6 (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 and P6 : Best practices	V	V
	12:00 13:30	-	Lunch/Rest/Prayers	\checkmark	\checkmark
	13:30 16:00	-	Keresa Palm Oil Mill Document audit continues for Keresa Palm Oil Mill	\checkmark	\checkmark
	15:30 16:00	-	Verify any outstanding issues & Preparation for closing meeting	\checkmark	\checkmark
	16:00 17:00	-	Closing Meeting	\checkmark	\checkmark
Thursday 11/11/17	AM		Audit Team travelling back to KL via MH2743 (ETD:1100)	\checkmark	\checkmark

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Appendix B: List of Stakeholders Contacted

Internal Stakeholders

	esa Plantations Sdn. Bhd. agement team I Executives ical Assistant he Attendants ale worker der committee chairman ign worker's esentatives operators	
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External Stakeholders

Government Departments - MPOB	NGOs and others Contractor – Yun Hoo Sdn Bhd Supplier – Qudqoa Chemical Sdn Bhd	Local Communities TR Majang	
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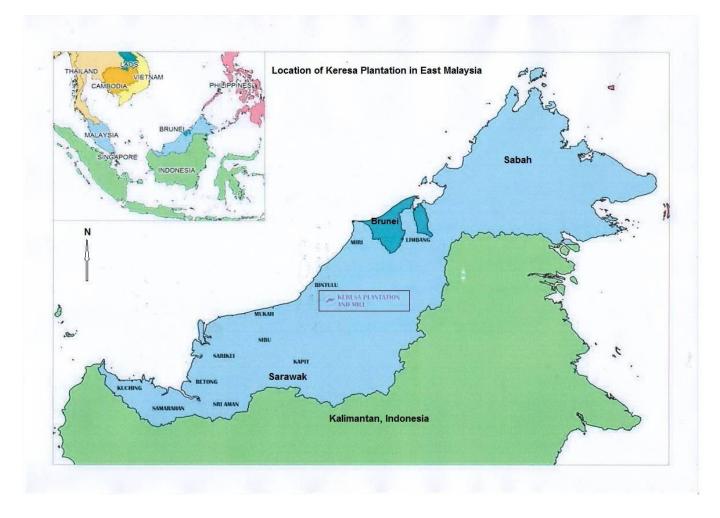
No	Name of smallholder	Year Planted	Land Area (ha)	Forecast FFB (Mt/ha/year)
1	N/A			
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
	TOTAL			

Appendix C: Smallholder Member Details

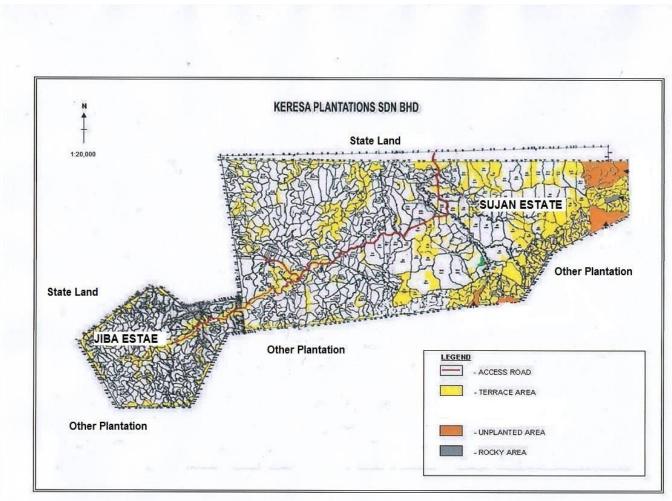
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Appendix D

i) Location Map of Keresa Palm Oil Mill Certification Unit and Supply bases



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ii) Sujan Estate and Jiba Estate Field Map

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Appendix E: List of Abbreviations Used

AN	Ammoniacal Nitrogen
ANPN	National Park Agency Gabon
BOD	Biological Oxygen Demand
CHRA	Chemical Health Risk Assessment
CPO	Crude Palm Oil
DGEPN	Environmental Protection Agency Gabon
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
GMP	Good Manufacturing Practice
HCV	High Conservation Value
IAV	Initial Assessment Visit
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
MSDS	Material Safety Data Sheet
MSPO	Malaysian Sustainable Palm Oil
0&G	Oil and Grease
РК	Palm Kernel
PPE	Personal Protective Equipment
PSQM	Plantation Sustainability and Quality Management
PQR	Performance Quality Rating
RC	Re-Certification
RED	Renewable Energy Directive
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
SOU	Strategic Operating Unit
SS	Suspended Solids
TN	Total Nitrogen
TS	Total Solids
VFA	Volatile Fatty Acids