

- SURVEILLANCE ASSESSMENT Public Summary Report

Boustead Plantations Berhad

Client company Address:

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

Certification Unit:

Telok Sengat Palm Oil Mill

Location of Certification Unit:

Telok Sengat Business Unit Telok Sengat Palm Oil Mill 81909, Kota Tinggi, Johor, Malaysia

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Report Number: 3091762

Assessment Conducted by:

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Section 1: Executive Summary

1.1 Organizational Information and Contact Person						
Company Name	Boustead Plantations Berhad	Boustead Plantations Berhad				
Mill/Estate	MPOB License No.		Expiry	Date		
Telok Sengat Palm Oil Mill	500089304000		31/8/2	020		
Telok Sengat Estate	615231002000		30/9/2	020		
Kulai Young Estate	616050002000		31/12/2020			
Chamek Estate	613906002000		31/7/2020			
Address	19th Floor Menara Boustead, 69, Jala	ın Raja (Chulan,	50200 Kuala Lumpur, Malaysia		
Certification Unit	Telok Sengat Business Unit, Telok Se Malaysia	ngat Es	tate, 81	1909 Kota Tinggi, Johor,		
Contact Person Name	Anuar Bin Semail / Nurul Hanani Binti	i Abdulla	ah			
Website	www.bousteadplantations.com.my	E-mail	l	anuar.bea@boustead.com.my hanani.bea@boustead.com.my		
Telephone	+603-2145 2121 Ext. 351	Facsin	nile	+603-2144 7917		

1.2 Certifica	1.2 Certification Information						
Certificate Number	Mill: MSPO 697045 Estate: MSPO 697047						
Issue Date	15/04/2019	15/04/2019 Expiry date 14/04/2024					
Scope of Certification	Mill: Production of Sustainable Estate: Production of Sustainab						
Standard	Mill: MS 2530-4:2013 Part 4: General principles for palm oil mills Estate: MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholders						
Stage 1 Date		26-30/08/2018					
Stage 2 / Initia	l Assessment Visit Date (IAV)	19-22/11/2018					
Continuous Ass	Continuous Assessment Visit Date (CAV) 1		10-13/03/2020				
Continuous Assessment Visit Date (CAV) 2		-					
Continuous Ass	sessment Visit Date (CAV) 3	-					
Continuous Ass	sessment Visit Date (CAV) 4	-					



Other Certifications							
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date				
Nil							

1.3 Location of Certification Unit						
Name of the Certification Unit	Site Address	GPS Reference of the site office				
(Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)		Longitude	Latitude			
Telok Sengat Palm Oil Mill	Telok Sengat Palm Oil Mill, 81909 Kota Tinggi, Johor, Malaysia	104.04375	1.56792			
Telok Sengat Estate	Telok Sengat Estate, 81909 Kota Tinggi, Johor, Malaysia	104.03717	1.56767			
Chamek Estate	Chamek Estate, Jalan Paloh, 86009 Kluang, Johor, Malaysia	103.24999	2.14967			
Kulai Young Estate	Kulai Young Estate, Jalan Sedenak, 81000 Kulai, Johor, Malaysia	103.53014	1.62542			

1.4 Certified Area								
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted			
Telok Sengat Estate	3,503.40	60.70	115.90	3,680.00	95.20			
Chamek Estate	795.60	-	21.30	816.90	97.39			
Kulai Young Estate	657.50	-	13.00	670.50	98.06			
TOTAL	4,956.50	60.70	150.20	5,167.40	95.92			

1.5 Plantings & Cycle							
Estato		А	ge (Years)			Maturett	Toomanduus
Estate	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30	Mature**	Immature
Telok Sengat Estate	353.70	897.50	1,579.30	570.30	102.60	3,149.70	353.70
Chamek Estate	98.80	60.80	476.90	159.10	-	696.80	98.80
Kulai Young Estate	421.60	36.30	-	199.60	-	235.90	421.60
Total (ha)	874.10	994.60	2,056.20	929.00	102.60	4,082.40	874.10



1.6 Certified Tonnage of FFB						
		Tonnage / year				
Estate	Estimated (7 2010)	Actual	Forecast			
	(Jan 2019 – Dec 2019)	(May 2019 – Feb 2020)	(Mar 2020 – Feb 2021)			
Telok Sengat Estate	72,000.00	60,000.00	68,400.00			
Chamek Estate	14,500.00	12,083.33	13,775.00			
Kulai Young Estate	10,800.00	9,000.00	10,260.00			
Total	97,300.00	81,083.33	92,435.00			

1.7 Uncertified Tonnage of FFB							
	Tonnage / year						
Estate	Estimated	Actual	Forecast				
	(Jan 2019 - Dec 2019)	(May 2019 - Feb 2020)	(Mar 2020 – Feb 2021)				
Small Growers	10,000.00	6,753.00	10,000.00				
FFB Suppliers	60,000.00	49,020.00	60,000.00				
Total	70,000.00	55,773.00	70,000.00				

1.8 Certified Tonnage							
	Estimated (Jan 2019 – Dec 2019)	Actual (May 2019 – Feb 2020)	Forecast (Mar 2020 – Feb 2021)				
Mill Capacity:	FFB	FFB	FFB				
40 MT/hr	97,300.00	81,083.33	92,435.00				
SCC Model:	CPO (OER: 25.64%)	CPO (OER: 21.30%)	CPO (OER: 22.00%)				
МВ	24,947.72	17,270.75	20,335.70				
	PK (KER: 5.61%)	PK (KER: 5.45%)	PK (KER: 5.50%)				
	5,458.53	4,419.04	5,083.93				

1.9 Actual Sold Volume (CPO)						
CDO (MT)	MSPO Certified	Other Schei	nes Certified	Conventional	Total	
CPO (MT)	MSFO Cel tilled	ISCC	RSPO	Conventional	iotai	
15,500.00	Nil	n/a	n/a	15,500.00	15,500.00	



1.10 Actual Sold Volume (PK)						
DV (MT)	MSPO Certified	Other Schei	mes Certified	Conventional	Total	
PK (MT)	PISFO Certified	ISCC	RSPO	Conventional	iotai	
3,700.00	Nil	n/a	n/a	3,700.00	3,700.00	



Section 2: Assessment Process

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 190 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 10-13/3/2020. The audit programme is included as Section 2.3. The approach to the audit was to treat the Telok Sengat Business Unit 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 sample were determined based on formula $S = r\sqrt{n}$ where n is the number of estates while when applicable, the smallholders' sample were determined following the MSPO Certification Requirement. However, no certified smallholders involved within Telok Sengat Business Unit certification.

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 surveillance 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.

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



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

Assessment Program					
Name (Mill / Plantation / Group smallholders)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Telok Sengat Palm Oil Mill	✓	✓	✓	✓	✓
Telok Sengat Estate	✓	✓	✓	✓	✓
Chamek Estate	✓	✓	✓	✓	✓
Kulai Young Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: March 1, 2021 - March 4, 2021

Total No. of Mandays: 8 days

2.1 BSI Assessment Team

Team Member Name	Role (Team Leader or Team member)	Qualifications (Short description of the team members)
Hafriazhar Mohd Mokhtar	Team Leader	Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 9001, ISO 14001, ISO 45001 and ISO 50001 and has accumulated more than 1000 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the MSPO & RSPO P&C and SCCS standards since 2011 and completed his MSPO & RSPO P&C and SCCS Lead Assessor courses successfully. He has been involved in RSPO audits within Malaysia, Papua New Guinea, Solomon Islands, Gabon, Nigeria and Pakistan. During this assessment, he assessed the aspects Legal, SIA, workers employment terms, pay & conditions, welfare, stakeholders' consultation, social, long-term economic viability etc. (Principle 2, Principle 3, Principle 4, Principle 6, and Principle 7). Able to speak and understand Bahasa Malaysia and English.
Muhammad Naqiuddin	Team Member	He holds Bachelor of Science Horticulture at University Putra Malaysia. He has 11 years working experience in oil palm plantation industry as sustainability team. Joining the sustainability team, he managed, implement and monitors the RSPO, ISCC, MSPO and ISO9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also supports in providing training related to RSPO, MSPO and other certifications where applicable to the operations during previous company. He is a trained as Safety and Health Officer, Food Safety



	System (FSSC and ISO 22000) for Mill and refineries, ISO 9001, ISO 45001 and already attend HCV training with Proforest. During assessment, he covered the Mill best practices, Estate best practices, Land and Legal issues, Environment and ecological, HCV, OHS, Waste management, environment aspect impact, and environment aspect impact etc. (Principle 1, Principle 3, Principle 4, Principle 5 and Principle 7). Able to speak and understand Bahasa Malaysia and English.
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2.2 Accompanying Persons

No.	Name	Role
Nil	n/a	n/a

2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment (attached assessment plan).

Date	Time	Subjects	нмм	MNM
Monday 9/3/2020	PM	Audit team travel to JB	✓	✓
Tuesday 10/3/2020	08:30 - 09:00	 Opening Meeting (Kulai Young Estate) Presentation by Boustead Presentation by BSI Lead Auditor - introduction of team member and assessment agenda Confirmation of assessment scope and finalizing audit scope 		✓
	09:00 - 12:30	Kulai Young Estate Estate assessment: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	✓
	12:30 - 13:30	Lunch break		
	13:30 - 16:30	Kulai Young Estate Document Review (MS2530:2011 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, P6: Best practices and P7: Development of New Planting	√	✓
	16:30 - 17:00	Interim closing meeting	✓	✓
Wednesday 11/3/2020	08:30- 12:30	Chamek Estate Estate assessment: 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.	√	✓

...making excellence a habit."



Date	Time		Subjects	нмм	MNM
	10:30 12:30	-	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	✓	-
	12:30 12:30 13:30	_	Lunch break	✓	✓
	13:30 16:30	-	Chamek Estate Document Review (MS2530:2011 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, P6: Best practices and P7: Development of New Planting	~	~
Thursday 12/3/2020	08:30- 12:30		Telok Sengat Palm Oil Mill Mill Assessment: Plant visit, FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	~	~
	10:30 12:30	-	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	✓	-
	12:30 13:30	-	Lunch break	✓	✓
	13:30 16:30	_	Telok Sengat Palm Oil Mill Document review (MS2530:2011 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	~	~
	16:30 17:00	-	Interim closing meeting	✓	✓
Friday 13/3/2020	08:30- 12:30		Telok Sengat Estate Estate assessment: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	~
	10:30 12:30	-	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	✓	-
	12:30 13:30	-	Lunch break	✓	✓
	13:30 16:30	_	Telok Sengat Estate Document Review (MS2530:2011 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, P6: Best practices and P7: Development of New Planting	~	~
	16:30 17:00	_	Closing meeting	✓	✓



Section 3: Assessment Findings

3.1 Details of audit results

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

- ☐ MSPO MS 2530-2:2013 General Principles for Independent Smallholders
- ☑ MSPO MS 2530-3:2013 General Principles for Oil Palm Plantations and Organized Smallholders

3.2 Details of Nonconformities and Opportunity for improvement

The nonconformity is listed below.

During the Certification Assessment there were one (1) Major & one (1) Minor nonconformities raised. The Telok Sengat Business Unit 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 Non-conformity(ies) has been verified for its effectiveness and closed accordingly.

Major/ Minor Nonconformities:			
Ref:	Area/Process: MS2530-3:2013 (MSPO Part 3)	Clause:	
1892458-202003-M1	Telok Sengat Business Unit	4.5.5.1 (Part 3)	
	Issue Date: 13/3/2020	Due Date: 12/6/2020	
Requirements:	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: b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities.		
Statement of Nonconformity:	The requirement was not adequately complied with		
Objective Evidence:	The monitoring of outgoing water was not available in all estate during audit. From the HCV report by MEC dated July 2018, estate was required to monitor the water quality which may have negative impacts into the natural waterways.		
Corrections:	The estate already sent quotations to HQ department for water sampling and waiting their replied		
Root cause analysis:	This HCV report monitoring requirement not captured in the existing plan		
Corrective Actions:	To include in the established water management plan and conduct water sampling at outgoing water once a year		
Assessment Conclusion:	Quotations received by Telok Sengat Business Unit's estates on 16/3/2020 and the sampling in all estates planned to be conducted on April 2020. However, due to COVID-19 Movement Control Order (MCO), the actual sampling activities were		



postponed to June 2020 and Telok Sengat Business Unit allowed extension to
implement the CAP to 90 days. Actual sampling completed on June 2020 with
evidence received shown that natural stream/river water sampling in all estates
(Telok Sengat Estate, Kulai Young Estate & Chamek Estate) analysis results complied
with all parameters. Hence, Major NC was closed on 8/6/2020.

Major/Minor Nonconformities:			
Ref:	Area/Process: MS2530-3:2013 (MSPO Part 3)	Clause:	
1892458-202003-N1	Telok Sengat Business Unit	4.4.5.4 (Part 3)	
	Issue Date: 13/3/2020	Due Date: 12/3/2021	
Requirements:	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		
Statement of Nonconformity:	Information in contractor workers' payslip was insu workers paid based on legal/industry minimu employment contract agreed between the contract	m standards according to the	
Objective Evidence:	Objective evidence: Payslip for Kulai Young Estate contractor's employees as per following: - Cipta Melati Enterprise Employee ID # B5783219; Date joined: 24/4/2011; Post: Harvester - Cipta Melati Enterprise Employee ID # B7193861; Date joined: 16/7/2017; Post: Harvester - Cipta Melati Enterprise Employee ID # B3624666; Date joined: 29/7/2013; Post: Harvester		
Corrections:	The Estate to conduct training and checking on contractor employees' payments		
Root cause analysis:	No briefing and checking for contractor on ensure employees contractor paid based on legal or industry minimum standards		
Corrective Actions:	To conduct briefing and regularly checking on contractor employees' payments		
Assessment Conclusion:	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.		

Opportunity for Improvement			
Ref: Nil Area/Process: n/a Clause: n/a			
Objective Evidence:	n/a		

	Noteworthy Positive Comments			
PF 1	Stakeholder interview – mostly positive feedbacks			
PF 2	Good continuous improvement program implementation generally for productivity aspects			
PF 3	Good social contributions towards internal and external stakeholders			
PF 4	Good documents retrieval			



3.3 Status of Previously Identified Nonconformities and OFI

Major/ Minor Nonconformities:			
Ref: 1711670-201811-M1	Area/Process: MS2530-3:2013 (MSPO Part 3) & MS2530-4:2013 (MSPO Part 4)	Clause: 4.4.4.1 (Part 4)	
	Telok Sengat Business Unit	,	
	Issue Date: 22/11/2018	Date Closed: 18/2/2019	
Requirements:	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.		
Statement of Nonconformity:	There was no monitoring by employer to cor interval, each interval being no longer than a mo		
Objective Evidence:	Monthly inspection for LEV at Telok Sengat POM was not done as per Local exhaust ventilation report which was done on 26/7/2018 by Hygiene Tech II (PAC Testing & Consulting Sdn Bhd).		
Corrections:	Mill need to ensure LEV inspection will be conducted on monthly basis.		
Root cause analysis:	No checklist form for LEV monthly inspection established.		
Corrective Actions:	Mill will be established the checklist form and inspection of LEV.		
Assessment Conclusion:	All the evidence sighted found adequate and effectively implemented. The checklist for LEV monthly inspection was established. The record of inspection done on Dec 18 using the checklist form was sighted. Hence, the Major NC was closed on 18/2/2019.		
Verification Statement	ASA 1 verification:		
	The OSH programme dated 4 Jan 2020 cover for OSH meeting, Training, WPI, HIRARC and others. Policy already been communicated with workers and staff during OSH meeting and morning briefing. OSH Manual refer to OSH/001/2015 dated 7 Dec 2015.		
	Interview with staff and workers revealed that all working SOPs being consistently implemented among all employees and monitored by the management through daily muster briefing, training and etc.		
	Hence, the Major NC remained closed.		

Major/ Minor Nonconformities:		
Ref: 1711670-201811-M2	Area/Process: MS2530-3:2013 (MSPO Part 3) & MS2530-4:2013 (MSPO Part 4) Telok Sengat Business Unit	Clause: 4.5.3.3 (Part 3 and Part 4)
	Issue Date: 22/11/2018	Date Closed: 18/2/2019
Requirements:	The palm oil mill management shall establish handling of used chemicals that are classi Regulations (Scheduled Waste) 2005, Environn proper and safe handling, storage and disposal as per Environmental Quality Act 1974 (Scheduled Vaste)	fied under Environmental Quality nental Quality Act, 1974 to ensure Scheduled waste shall be disposed ed Waste) Regulations, 2005.
Statement of Nonconformity:	The handling on scheduled waste was not imple	mented effectively.



Objective Evidence:	 Telok Sengat POM: The inventory and labelling for SW409 was not updated and implemented effectively. Chamek Estate (Scheduled Waste Store): The scheduled waste was not properly labelling especially for SW305
Corrections:	Mill and estate need to ensure all schedule waste inventory and labeling was updated.
Root cause analysis:	No monitoring by the management
Corrective Actions:	The inventory and labelling will be monitored by person in-charge/competent person
Assessment Conclusion:	- The inventory and labelling were updated and implemented accordingly at TSPOM. Sighted the record of inventory and photo of labelling.
	- The appointment letter for person in-charge at TSE, KYE was sighted.
	- The appointment letter for person in-charge at TSPOM was sighted
	- The labelling for scheduled waste at Chamek Estate was done accordingly. Sighted the photo for labelling at scheduled waste store.
	All the evidence sighted found adequate and effectively implemented. Hence, the Major NC was closed on 18/2/2019.
Verification Statement	ASA 1 verification:
	Visit to estate field and premises shown the management and disposal plan has been implemented accordingly. Records has been maintained by relevant person in-charge. Sighted during site verification in Chamek estate, the labelling of scheduled waste was available accordingly. The inventory can refer 01IU78X0 dated Jan 2020 show date of generate was accordingly to regulation requirement
	Visit to mill shown the management and disposal plan has been implemented accordingly. Records sighted for SW i.e. Identification Inventory of Scheduled Wastes; Inventory last dated Jan 2019, In Mill generate SW 409, 410, 305, 306, 109, 103 and 102. Last disposal is on SW 305, 102,410,109,306 at Kualiti Alam dated Jan 2020
	Hence, the Major NC remained closed.

Major/ Minor Nonconformities:		
Ref: 1711670-201811-M3	Area/Process: MS2530-3:2013 (MSPO Part 3) & MS2530-4:2013 (MSPO Part 4) Telok Sengat Business Unit	Clause: 4.4.4.2 (Part 3)
	Issue Date: 22/11/2018	Date Closed: 18/2/2019
Requirements:	The occupational safety and health plate d) The management shall provide the appropriate all potentially hazardous operations as identified such as Hazard Identification, Risk Assessmi) A First Aid Kit equipped with approved corworksite.	te PPE at the place of work to cover in the risk assessment and control nent and Risk Control (HIRARC).
Statement of Nonconformity:	The PPE implementation was not adequately wo	rn



Objective Evidence:	Chamek Estate 1. Harvesting - the harvester was not wearing PPE adequately (safety helmet) 2. No first aid kit available during site visit to harvesting area (PM00C) Telok Sengat Estate 1. The PPE for worker working at height was not adequately implemented
Corrections:	 Chamek Estate: To conduct regular PPE training and to give more information and education of the safety awareness. To improve first-aid box to sling bag (easier to carry). Telok Sengat Estate:
	To monitor and checking during working at height.
Root cause analysis:	 Chamek Estate: Some of harvester omit and unwilling to wear PPE (attitude). First-Kit is available but Mandore is on leave during audit/assessment. Furthermore, the first-aid box is too bulky to bring to field or work place.
	Telok Sengat Estate
	No awareness by the contractor during work at height
Corrective Actions:	Chamek Estate:
	Conduct meeting with workers to:
	1. Brief awareness and long-term effects that failure to wear PPE could have on their health (as per picture attached).
	2. Briefing and handing over sling bags to respective persons.
	Telok Sengat Estate: Conduct training SWP working at height
Assessment Conclusion:	 The PPE monitoring was done on 3/12/2018 by the management to check the implementation of PPE during harvesting activity. Record of PPE replacement was sighted for Chamek Estate.
	3. Briefing/Training for first aid box and PPE was done on 3/12/2018.
	4. SWP training at TSE was done on 4/12/18. The records were sighted.
	All the evidence sighted found adequate and effectively implemented. Thus, Major NC was closed on 18/2/2019.
Verification Statement	ASA 1 verification:
	OSH Policy dated 2 Dec 2019 already been communicated with workers and staff during OSH meeting and morning briefing. OSH Manual refer to OSH/001/2015 dated 7 Dec 2015.



In Kulai Young Estate, OSH meeting conducted quarterly by management, the latest
record is dated 12 December 2019 and previously meeting record is on 26 September 2019 and 27 June 2019.
i) The Employee already been trained in First aid as per verification during site visit and interview session. The latest training was done on Nov 2019.
Hence, the Major NC remained closed.

Major/ Minor Nonconformities:		
Ref:	Area/Process: MS2530-3:2013 (MSPO Part	Clause:
1711670-201811-M4	3) & MS2530-4:2013 (MSPO Part 4)	4.5.3.4 (Part 3)
	Telok Sengat Business Unit	
	Issue Date: 22/11/2018	Date Closed: 18/2/2019
Requirements:	Empty pesticide containers shall be pur environmentally and socially responsible way, contamination of water sources or to human he manufacturer's labels should be adhered to. R national program on recycling of used HDPE pes	ealth. The disposal instructions on Reference should be made to the
Statement of Nonconformity:	The records for recycle empty container was not	: available.
Objective Evidence:	Telok Sengat Estate 1. No record of empty container that sent for the empty containe	cycle to G-Planters.
Corrections:	To hire contractor from list DOP to collect and di 672. Disposal was done on 4 th Dec 2018. Refer E	
Root cause analysis:	There was no monitoring of disposal of empty co	ontainer established.
Corrective Actions:	Appointed person in-charge to monitor disposal	of empty container
Assessment Conclusion:	1. The appointment letter for person in-charge	at TSE, KYE was sighted.
	2. Sighted the letter from DOA	
	3. Sighted the letter from DOE	
	4. The disposal of empty container was done a the UPPCR Collection form by G-Planter and	
	All the evidence sighted found adequate and efform NC was closed on 18/2/2019.	ectively implemented. Thus, Major
Verification Statement	ASA 1 verification:	
	Estate conducted the Triple Rinsing of Empty Chemical Container Training (Latihan 3 Kali Pembilasan Bekas Racun dan Bahan Kimia) on 29 June 2019 to all sprayers gang for both divisions based on the guideline for used plastic pesticide container recycling program (UPPCRP). Visit to estates confirmed that all pesticides stored at chemical store where empty chemical containers have been tripling rinsed and punctured. The containers were collected by G-Planter for recycle purposes. Hence, the Major NC remained closed.	



Major/ Minor Nonconformities:		
Ref: 1711670-201811-M5	Area/Process: MS2530-3:2013 (MSPO Part 3) & MS2530-4:2013 (MSPO Part 4) Telok Sengat Business Unit	Clause: 4.5.6.1 (Part 3)
	Issue Date: 22/11/2018	Date Closed: 18/2/2019
Requirements:	Information shall be collated that includes both to relevant wider landscape-level considerations (substitution of high biodiversity value habitate ecosystems, that could be significantly affected by Conservation status (e.g. The International Utland Natural Resources (IUCN) status on legal prohabitat requirements of rare, threatened, or end significantly affected by the grower(s) activities	ts, such as rare and threatened by the grower(s) activities. nion on Conservation of Nature otection, population status and
Statement of Nonconformity:	The report for HCV assessment was not available	e.
Objective Evidence:	The HCV assessment was done by the Malaysia Environmental Consultant on 2-10/4/2018, however the report yet to be received by the management.	
Corrections:	To follow-up with Sustainability Dept.	
Root cause analysis:	HCV assessment is yet to be received from MEC	
Corrective Actions:	Management plan will be done and implemented	I once HCV report obtained.
Assessment Conclusion:	The communication between Telok Sengat Bl sighted. The evidence sighted found adequate ar the Major NC was closed on 18/2/2019.	-
Verification Statement	ASA 1 verification:	
	The HCV assessment was done by the Malaysia 10/4/2018, however the report yet to be receive audit the report of HCV was available dated Ju report includes Telok Sengat Estate, Kulai You Estate, and Bekoh Estate with total hectarage HCV area was 279.18 ha.	ed by the management. On ASA 1 ly 2018 in all operating unit. This ng Estate, Chamek Estate, Eldred
	Hence, the Major NC remained closed.	

Major/ Minor Nonconformities:		
Ref: 1711670-201811-M6	Area/Process: MS2530-3:2013 (MSPO Part 3) & MS2530-4:2013 (MSPO Part 4)	Clause: 4.4.2.5 (Part 3)
	Telok Sengat Business Unit	
	Issue Date: 22/11/2018	Date Closed: 18/2/2019
Requirements:	Complaints and resolutions for the last 24 month available to affected stakeholders upon request.	ns shall be documented and made
Statement of Nonconformity:	Records to show that the complaint has been re Sengat Estate.	solved were not available in Telok
Objective Evidence:	Telok Sengat Estate	



	No evidence was sighted for the complaints that have been resolved on September 2018 by verified the Complaint Record and no acknowledgement by the complainant after the complains have resolved.	
Corrections:	To prepared log book and to improved complaint form with insert signature of informer.	
Root cause analysis:	No monitoring by the management on the records of complaint	
Corrective Actions:	To monitor and checking and included in OSHA meeting. To monitor log book by the management	
Assessment Conclusion:	The management has established new complaint form to include acknowledgement by the complainant after the complaints have resolved.	
	2. OSHA meeting minute was sighted. The discussion on the complaint at Telok Sengat Estate was done during OSHA meeting accordingly.	
	The evidence sighted found adequate and effectively implemented. Hence, the Major NC was closed on 18/2/2019.	
Verification Statement	ASA 1 verification:	
	Complaints and resolutions records were documented and made available to affected stakeholders upon request since August 2018 including the OSHA minutes of meeting.	
	Hence, the Major NC remained closed.	

Major/ Minor Nonconformities:		
Ref: 1711670-201811-M7	Area/Process: MS2530-3:2013 (MSPO Part 3) & MS2530-4:2013 (MSPO Part 4) Telok Sengat Business Unit	Clause: 4.4.5.6 (Part 3)
	Issue Date: 22/11/2018	Date Closed: 18/2/2019
Requirements:	All employees shall be provided with fair contract employee and employer. A copy of employment every employee indicated in the employment recommendation.	contract is available for each and
Statement of Nonconformity:	Terms and conditions that stated in employment contractors' workers were not according to the E	
Objective Evidence:	Employment contracts for contractor workers we stated in the contract was not according to Empla. Workers who worked more than 5 years and a days of sick leave per year if admitted to hospita work less than 5 years is not entitled with the hosping testate and Chamek Estate. b. For daily rated contractor's workers, the mining was RM 6.50 as stated in the contract. However, minimum rate of overtime per hour should be RI Estate.	ere signed. However, the terms loyment Act 1955 as below: above only will be entitled with 60 all which indicates those who has aspitalization leave in Telok num rate of overtime per hour a for daily rated RM 38.46,
Corrections:	Corrections have been made and workers have amended agreement.	been called to brief and sign the
Root cause analysis:	No person in charge monitor the terms and concontract workers.	ditions in employment contract for



Corrective Actions:	Training to the person in-charge
Assessment Conclusion:	The employment contract was reviewed accordingly.
	2. Training for person in charge at Telok Sengat BU was done accordingly.
	The evidence sighted found adequate and effectively implemented. Hence, the Major NC was closed on 18/2/2019.
Verification Statement	ASA 1 verification:
	Employment contracts for checkroll workers were acknowledged and kept a copy by the workers verified through interviewed with the workers. The contract was in the language that understood by the workers. The terms and conditions were clearly stated in the contract such as salary, annual leaves and public holiday entitlement, rate of work on rest day and overtime. Sampled of employment contracts sighted as following:
	Kulai Young Estate:
	- Employee # 2951H; Date joined: 1/7/2017; Post: Crèche Ayah
	- Employee # 2958A; Date joined: 1/7/2019; Post: Watchmen
	- Contractor (Cipta Melati Enterprise) Employee ID # B5783219; Date joined: 24/4/2011; Post: Harvester
	- Contractor (Cipta Melati Enterprise) Employee ID # B7193861; Date joined: 16/7/2017; Post: Harvester
	- Contractor (Cipta Melati Enterprise) Employee ID # B3624666; Date joined: 29/7/2013; Post: Harvester
	Chamek Estate:
	- Employee # 2123B; Date joined: 1/6/1995; Post: Auxiliary Police
	- Employee # 0521H; Date joined: 1/3/2010; Post: Harvester
	- Employee # 557S; Date joined: 1/3/2010; Post: Harvester
	- Contractor (Perusahaan Mewah Hijau) Employee ID # B3765591; Date joined: 24/4/2011; Post: Harvester
	- Contractor (Perusahaan Mewah Hijau) Employee ID # AU161915; Date joined: 16/7/2017; Post: Harvester
	- Contractor (Lokman Baba Resources) Employee ID # C06995112; Date joined: 29/7/2013; Post: Harvester
	Telok Sengat Estate:
	- Employee # 2874A; Date joined: 1/11/2011; Post: Auxiliary Police
	- Employee # 2882J; Date joined: 1/4/2014; Post: Harvester
	- Employee # 2868F; Date joined: 3/10/2011; Post: Harvester
	- Contractor (Cipta Melati Enterprise) Employee ID # AU226215; Date joined: 24/4/2011; Post: Harvester
	- Contractor (Cipta Melati Enterprise) Employee ID # AU187928; Date joined: 16/7/2017; Post: Harvester



- Contractor (Cipta Melati Enterprise) Employee ID # AU226215; Date joined: 29/7/2013; Post: Harvester
Hence, the Major NC remained closed.

Major/ Minor Nonconformities:			
Ref: 1711670-201811-M8	Area/Process: MS2530-3:2013 (MSPO Part 3) & MS2530-4:2013 (MSPO Part 4) Telok Sengat Business Unit	Clause: 4.4.5.11 (Part 3)	
	Issue Date: 22/11/2018	Date Closed: 18/2/2019	
Requirements:	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.		
Statement of Nonconformity:	Linesite inspection was not carried out as per Housing and Amenities Act 1990 (Act 446).	the Workers' Minimum Standards	
Objective Evidence:	Chamek Estate: Linesite inspection was carried out once a month or twice a month in Chamek Estate which does not comply with Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) by Hospital Assistant by verified through the Linesite Inspection Form. Last inspection was carried out on 9/10/2018 and 25/10/2018.		
Corrections:	Chamek Estate:		
	To do the linesite inspection as per Worker's Minimum Standards Housing and Amenities Act 1990 (Act 446).		
Root cause analysis:	Chamek Estate:		
	Linesite inspection was done twice a month instead of weekly inspection as per Act.		
Corrective Actions:	Chamek Estate:		
	Appoint person in-charge to conduct weekly inspections as per Act		
Assessment Conclusion:	All the evidence sighted found adequate and effectively implemented. The linesite inspection was done on weekly basis by Mr Faizal. The record was sighted. Hence, the Major NC was closed on 18/2/2019.		
Verification Statement	ASA 1 verification:		
	Based on the Workers' Minimum Standards Housing and Amenities (Amendment) Act 2019, line-site housing areas were inspected at least twice a month and inspection report were documented in "Line Site Inspection Log book". Sighted sample latest inspection was carried out by Hospital Assistant – Mr. Zayuri Mohd Noor on 18.04.2019 in Telok Sengat Estate. Hence, the Major NC remained closed.		
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Major/ Minor Nonconformities:			
Ref: 1711670-201811-M9	Area/Process: MS2530-3:2013 (MSPO Part 3) & MS2530-4:2013 (MSPO Part 4) Telok Sengat Business Unit	Clause: 4.6.3.1 (Part 3)	



	Issue Date: 22/11/2018	Date Closed: 18/2/2019
Requirements:	Pricing mechanisms for the products and other services shall be documented and effectively implemented.	
Statement of Nonconformity:	Credit terms of payment was not clearly stated contractors.	d in the agreement signed by the
Objective Evidence:	Telok Sengat Estate and Chamek Estate: Sampled of the agreements above found that credit terms of payment were not clearly stated in the agreement in Telok Sengat Estate and Chamek Estate. Interviewed with the contractors found that the payment system has changed to 10th -15th day of the following month for wages and 15th to 20th day of the following month for the advance which cause them to late payment for the workers' salary in Telok Sengat Estate.	
Corrections:	Chamek Estate:	
	To amend and insert terms of payment in Contra	act Agreement.
Root cause analysis:	Chamek Estate and Telok Sengat Estate: No person incharge that monitor the contract agreement especially the credit terms of payment.	
Corrective Actions:	Chamek Estate:	
	Appoint person incharge that will monitor the Contract Agreement and the payment made.	
Assessment Conclusion:	All the evidence sighted found adequate and effectively implemented. The contract agreement was reviewed accordingly to include credit terms of payment. Hence, the Major NC was closed on 18/2/2019.	
Verification Statement	ASA 1 verification:	
	Pricing mechanism for estates within Telok Sengat Business Unit mainly involved contracts for harvesting work, transportation of workers and FFB. Sighted that contracts available in documented information being signed and agreed by both parties that covers the pricing/pay rate, payment terms, terms and condition, areas of services, etc. Contracts found renewed annually and are paid promptly according to the terms.	
	Contracts are fair, legal and transparent as per sample sighted as following:	
	- Boustead Plantations Berhad Memorandum of Harvesting Contract; Contractor: Lokman I Agreement Serial Number: Contract Agreem 31/12/2020	Khalid Baba Resources; Contract
	- Boustead Plantations Berhad Memorandum of Harvesting Contract; Contractor: Perusahaan Serial Number: Contract Agreement 3 2020;	Mewah Hijau; Contract Agreement
	Consultation with stakeholders among estate vendors and contractors confirmed that agreed payments were made in timely manner by estates. Hence, the Major NC remained closed.	



Major/ Minor Nonconformities:				
Ref: 1711670-201811-M10	Area/Process: MS2530-3:2013 (MSPO Part 3) & MS2530-4:2013 (MSPO Part 4) Telok Sengat Business Unit	Clause: 4.6.3.2 (Part 4)		
	Issue Date: 22/11/2018	Date Closed: 18/2/2019		
Requirements:	All contracts shall be fair, legal and transparent a made in timely manner.	- ' '		
Statement of Nonconformity:	Contract agreements with the CPO transporters	were found expired.		
Objective Evidence:	Telok Sengat POM: CPO transporters' agreements were found expired as below: a. Company No.: 16810-V for transporting CPO which valid from 12/5/2014 for 1-year contract. b. Company No.: 21873-W for transporting CPO which valid from 12/10/2011 for 1-year contract.			
Corrections:	Boustead Plantation Berhad Markerting Depart contracts	ment will renew CPO transporter		
Root cause analysis:	Boustead Marketing Department was not renewed the CPO transporter agreements for Yewtan Enterprise and Aik Heng Hung Sdn. Bhd.			
Corrective Actions:	Mill person in-charge need to ensure all contracts c/w CPO transporters should be renewed.			
Assessment Conclusion:	 The communication between TSPO and marketing department on 9/12/2018 was sighted. The mill engineer will ensure on the renewal of contract, refer to the communication between the mill and marketing department. The agreement for Yewtan Enterprise and Aik Heng Hung Sdn Bhd still valid based on marketing department. Clause 6 in the contractor agreement was sighted. All the evidence sighted found adequate and effectively implemented. Hence, the Major NC was closed on 18/2/2019. 			
Verification Statement	ASA 1 verification:			
 Contracts are fair, legal and transparent as per sample sighted as following. Company No.: 440251P (Jaya Sewajar Sdn Bhd), dated 1995 valid up (Contract valid based on clause 12 - unless terminated by either part months' notice in advance). Company No.: 581864 U (Asia Elmark Sdn Bhd), dated 20.11.2018, remass at time of audit. Contract Ref: BEA/OCP/XI/2018. Company No.: 21873-W (Yew Tan Enterprise), dated 12.10.2011 remass at time of audit (Contract valid based on clause 6 - Term; unless to by either party with 2 months' notice in advance). Company No.: 612175-V (Sing Rubber & Transport Sdn Bhd), dated 26 contract remain valid as at time of audit. 		Bhd), dated 1995 valid up to date. terminated by either party with 2 d), dated 20.11.2018, remains valid I/2018 e), dated 12.10.2011 remain valid clause 6 – Term; unless terminated nce) asport Sdn Bhd), dated 26.08.2019,		
Consultation with stakeholders among mill vendors and contractors confirm agreed payments were made in timely manner by the mill.				



Hence, the Major NC remained closed.

Major/Minor Nonconformities:				
Ref: 1711670-201811-N1	Area/Process: MS2530-3:2013 (MSPO Part 3) & MS2530-4:2013 (MSPO Part 4) Telok Sengat Business Unit	Clause: 4.4.1.1 (Part 3 and Part 4)		
	Issue Date: 22/11/2018	Date Closed: 13/3/2020		
Requirements:	Social impact should be identified and plans are negative impacts and promote the positive ones	•		
Statement of Nonconformity:	Social Impact Assessment report was not available Estate, Chamek Estate and Telok Sengat POM.	le during the audit in Telok Sengat		
Objective Evidence:	Social Impact Assessment was carried out on 2-10/4/2018 by MEC Consultant that involved the participation of relevant stakeholders. Preliminary of SIA findings was sighted. However, the official assessment report has yet to be obtained in Telok Sengat Estate, Chamek Estate and Telok Sengat POM.			
Corrections:	Mill and estate need to ensure SIA official report are identified and management plan should be developed.			
Root cause analysis:	Mill and estate yet to receive the SIA official report.			
Corrective Actions:	The SIA official report will be sent by MEC Consultant and SIA Management Plan will be established.			
Assessment Conclusion:	CAP was accepted. The effectiveness of the corrective action will be verified during next assessment.			
Verification Statement	ASA 1 verification:			
	Social impact identified through Social Impact Assessment conducted by Malaysian Environmental Consultants Sdn. Bhd. as per report dated 29/6/2018. Assessment was conducted on 2-10/4/2018 with stakeholder consultations conducted on 21-22/5/2018.			
	Hence, the Minor NC has been closed on 13/3/2020.			

Major/Minor Nonconformities:			
Ref: 1711670-201811-N2	Area/Process: MS2530-3:2013 (MSPO Part 3) & MS2530-4:2013 (MSPO Part 4) Telok Sengat Business Unit	Clause: 4.4.5.4 (Part 3)	
	Issue Date: 22/11/2018	Date Closed: 13/3/2020	
Requirements:	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.		
Statement of Nonconformity:	The contractors' workers were not paid according to the Employment Act 1955 for the work on rest day.		
Objective Evidence:	Interviewed with the contractors' workers in Telok Sengat Estate confirmed that they were not paying twice per piece when they worked on rest day. The contractors also informed during stakeholder interviewed that they did not pay double of wages for workers who worked on rest day. Verified with the management also confirmed that they did not pay double for rest day work.		

...making excellence a habit."



Corrections:	Sampled of contractor's workers as below: a. Passport No.: B5352355 (TSE) b. Passport No.: B9247534 (TSE) c. Passport No.: B7196678 (TSE) d. Passport No.: B4073376 (TSE) e. Passport No.: B3628873 (TSE) f. Passport No.: AT198309 (TSE) g. Passport No.: AT389686 (TSE) h. Passport No.: B2102481 (CE) i. IC No.: 84XXXX-23-5XXX (CE)	
Corrections.	Chamek Estate and Telok Sengat Estate: To comply with the Employment Act 1955 for the work on rest day and to reimburse the wages accordingly.	
Root cause analysis:	Chamek Estate and Telok Sengat Estate:	
	Contractor's workers were not paid according to Employment Act 1955 for the work on rest day because no works offered during rest day/ off day and public holiday.	
Corrective Actions:	Chamek Estate and Telok Sengat Estate:	
	No works will be offered during rest day/ off day and public holiday.	
Assessment Conclusion:	CAP was accepted. The effectiveness of the corrective action will be verified during next assessment.	
Verification Statement	ASA 1 verification:	
	There were employment contracts for workers. Pay and conditions are documented and are above the Minimum Wage Order 2020. Employment contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker for Telok Sengat Estate and Chamek Estate.	
	Hence, the Minor NC has been closed on 13/3/2020. However, based on samples sighted in Kulai Young Estate, it was found that information in contractor workers' payslip was insufficient for management to ensure workers paid based on legal/industry minimum standards according to the employment contract agreed between the contractor and his employee for following samples:	
	Kulai Young Estate pay slip for contractor's employees as per following - Cipta Melati Enterprise Employee ID # B5783219; Date joined: 24/4/2011; Post: Harvester - Cipta Melati Enterprise Employee ID # B7193861; Date joined: 16/7/2017; Post: Harvester - Cipta Melati Enterprise Employee ID # B3624666; Date joined: 29/7/2013; Post: Harvester	
	Hence, a Minor NC has been raised again since issues occurred at different sites to previously highlighted.	



Opportunity for Improvement			
Ref: 1711670-201811-I1	Area/Process: MS2530-3:2013 (MSPO Part 3) & MS2530-4:2013 (MSPO Part 4) Telok Sengat Business Unit	Clause: 4.6.3.1 (Part 4)	
Objective Evidence:	Telok Sengat POM: Sampled of contract agreement that signed by the contractors as below: a. Company: Lian Kin Tractor Works for backhoe works which valid from 1/1/2018 to 31/12/2018. b. Memo of Agreement No.: 002/2018 for grass cutting works which valid from 1/1/2018 to 31/12/2018. However, the credit terms for payment was not stated in the agreement even the payment was made immediately after closing account.		
Verification Statement	ASA I verification: Pricing mechanism for mill mainly for FFB purchased from external supplier. Price of current FFB price is prominently displayed at the mill outside the weighbridge counter and updated on monthly basis. Sighted the price as of 27.08.2019 is RM17.81. Price of past FFB price can be obtained through 'Monthly FFB Purchase" file, based on "Telok Sengat Palm Oil Mill Own Estate – Boustead Estates Agency Sdn Bhd (Marketing Department)" letter issued by Marketing department on monthly basis. Calculation of FFB price is based on 'Kadar Perahan 1% (MPOB)' guideline. Each of the grower will be updated on the new price and issued with "Computation of Payment for FFB Purchased" for reference and cross –checking.		

Opportunity for Improvement			
Ref:	Area/Process: MS2530-3:2013 (MSPO Part 3)	Clause:	
1711670-201811-I2	& MS2530-4:2013 (MSPO Part 4)	4.4.5.11 (Part 4)	
	Telok Sengat Business Unit	, ,	
Objective Evidence:	Telok Sengat POM: It was found the linesite inspection was carried on weekly basis in Telok Sengat POM but not covered for all quarters. In the Housing Inspection Schedule found that each house was inspected once a month only. In additional, during linesite inspection found that MQ 7 where the workers for contractor (install firefighting system) have stayed where the housing was not in good condition such as most of the glass windows were not available and the basin in kitchen was broken.		
Verification Statement	ASA I verification: During site visit to the linesite found that playground, football field, mosque and		
	temple were available and free access to all the workers and dependents. Sundry shop was available at Telok Sengat Estate which is inside the living quarters for mill.		

3.4 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1711670-201811-M1	Major (4.4.4.1-Part 4)	22/11/2018	Closed on 18/2/2019
1711670-201811-M2	Major (4.5.3.3-Part 3 & Part 4)	22/11/2018	Closed on 18/2/2019
1711670-201811-M3	Major (4.4.4.2-Part3)	22/11/2018	Closed on 18/2/2019
1711670-201811-M4	Major (4.5.3.4-Part 3)	22/11/2018	Closed on 18/2/2019



1711670-201811-M5	Major (4.5.6.1-Part 3)	22/11/2018	Closed on 18/2/2019
1711670-201811-M6	Major (4.4.2.5-Part 3)	22/11/2018	Closed on 18/2/2019
1711670-201811-M7	Major (4.4.5.6-Part 3)	22/11/2018	Closed on 18/2/2019
1711670-201811-M8	Major (4.4.5.11-Part 3)	22/11/2018	Closed on 18/2/2019
1711670-201811-M9	Major (4.6.3.1-Part 3)	22/11/2018	Closed on 18/2/2019
1711670-201811-M10	Major (4.6.3.2-Part 4)	22/11/2018	Closed on 18/2/2019
1711670-201811-N1	Minor (4.4.1.1-Part 3 & Part 4)	22/11/2018	Closed on 13/3/2020
1711670-201811-N2	Minor (4.4.5.4-Part 3)	22/11/2018	Closed on 13/3/2020
1892458-202003-M1	Major (4.5.5.1-Part 3)	13/3/2020	Closed on 12/6/2020
1892458-202003-N1	Minor (4.4.5.4-Part 3)	13/3/2020	Open

3.5 Issues Raised by Stakeholders

IS#	Description
1	Feedbacks/Issues:
	Small grower – No issue with estates. Boustead estate management responsive to any request
	made. E.g. seeking permission to use estate route. Access to old Indian temple in the estate is not
	being restricted. No signs of disagreement between workers, contractors and management as at
	current. Received invitation for stakeholder meeting regularly but not being able to attend due to
	tightness in own estate activities.
	Management Responses:
	Open to all suggestion and will continue to assist small growers nearby the estate area should there
	a need.
	Audit Team Findings:
2	No further action. Reviewed stakeholder meeting minutes, no issue raised by the small growers.
2	Feedbacks/Issues: Estate sundry shop owner – Operating the shop since his father's generation. Aware of how
	complaint can be made with the estate management and all inquiry made is responded promptly by
	the estate management. Received stakeholder meeting invitation from estate management; and
	participated the meeting. Observed workers of the estates can move freely without being restricted
	and may choose to purchase their daily food supplied in the shop or externally.
	Management Responses:
	The management will continue to support the shop owner and open to any complaint and
	suggestion if any.
	Audit Team Findings:
	No further action.
3	Issues:
	SK, SJK(C), SJK(T), Sekolah Agama – No issue with estate and mill. Boustead management is
	supportive and provide contribution whenever requested. Students are from estate, village and
	nearby town area. No negative feedback or complaint received from any parents related to
	Boustead management. Based on communication and daily observation done by teachers, there is
	no signs that students is working after school or during school break.
	Management Responses:
	Will continue to include school's representative in stakeholder meeting and support any request
	made by the school.
	Audit Team Findings:



	No further issue.
4	Issues: Clinic – No issue with Boustead management. Received regular stakeholder meeting invitation and contribute whenever request made. No major accidents reported / treated that relates to Boustead employees.
	Management Responses: Management is committed to support the clinic if needed. Will continue to invite clinic for any stakeholder meeting and get as many feedbacks to improve further.
	Audit Team Findings: No further action.
5	Issues: Suppliers (spare-parts, engineering, transportation)- He has informed that payment was made promptly once they delivered the goods and services. He has good relationship with the management, receive regular invitation for meeting and attended stakeholder meeting.
	Management Responses: Have being dealing with the company for years and will continue to ensure payment is made promptly.
	Audit Team Findings: Payment records reviewed and confirmed they are made promptly.
6	Issues: Head of Village (Kg. Johor Lama & Kg. Chamek) – Estate management is supportive and responded to request made promptly. No complain received so far from any of the villager. No land encroachment. Have good relationship with the estate management and always receive invitation for meeting. The most recent meeting is in regard to MSPO introduction and sharing of information.
	Management Responses: The management acknowledged good relationship with the village representative and recently meet up with stakeholder. Will continue to support the villager and assist on any request made to the best they can
	Audit Team Findings: No further action. Review of stakeholder meeting confirmed.
7	Issues: Gender committee – well verse with the procedure to lodge complain if there is any case of sexual harassment. No sexual issue raised or received from any of their members and workers. They were treated equally disregards of gender.
	Management Responses: Will continue to support the gender committee.
	Audit Team Findings: No further issue.



Section 4: Assessment Conclusion and Recommendation

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

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

Certification Unit is approved and/or continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name:	Name:
Anuar Semail	Hafriazhar Mohd. Mokhtar
Company name:	Company name:
Boustead Plantation Berhad	BSI Services Malaysia Sdn. Bhd.
Title:	Title:
Head of Sustainability and Safety	Lead Auditor
Anuar Semail Date: 10/79/02 justainability and Safety Rousteau Estates Agency Sdn. Bhd.	Signature: Date: 6/7/2020



Appendix A: Summary of the findings by Principles and Criteria

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

Criterio	on / Indicator	Assessment Findings	Compliance	
4.1 Prin	1.1 Principle 1: Management commitment & responsibility			
Criterio	n 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	A policy for the implementation of MSPO shall be established. - Major compliance -	The MSPO Policy was established where the policy was signed by Chief Executive Officer of Boustead Plantations Berhad dated 9/12/2019.	Comply	
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	The policy was emphasized on the engagement and commitment to produce sustainable palm oil with the objective of improving the milling and estate operation.	Comply	
Criterio	n 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Internal audit was planned and conducted on annual basis by internal auditors from Boustead Plantations HQ sustainability unit. Latest internal audit was conducted on 21-22/11/2019 at Kulai Young Estate by a team led by Muhd. Hafiz Mamat assisted by Ahmad Amirul Ariff and Amrul Nizam Abdul Ghani. 3 Major NC raised in Kulai Young Estate were verified closed by internal auditors on 9/3/2020. Sighted the Lead Auditor training certificate for completion of MSPO Lead Auditor Course held on 18-22/12/2017; Cert. # MSPO 46130. Chamek Estate 19-20/11/2019.	Comply	



Criterio	on / Indicator	Assessment Findings	Compliance
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.	Internal audit procedure; SOP Issue 1; Date of issue: July 2016 was established by the management to include audit frequency, audit schedule, audit team, performing audit, audit responsibility etc. Internal audit shall be carried out once a year.	Comply
	- Major compliance -		
4.1.2.3	Report shall be made available to the management for their review.	All records related to Internal Audit was maintained and available for review at all estates visited.	Comply
	- Major compliance -		
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.	Latest management review meeting was conducted on 28/11/2019 chaired by Planting Director as a Sustainability Chairman and attended by Visiting Engineer, Sustainability personnel and all operating units' managers and assistant managers.	Comply
	- Major compliance -		
Criterio	n 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.	Action plan for continual improvements in estates were based on consideration of operational productivity, safety, environmental and social opportunities as following: - Increase application of field mechanization to counter labour	Comply
	- Major compliance -	shortage - To ensure the slope/ terracing area minimum or free facing soil erosion	

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Criterio	on / Indicator	Assessment Findings	Compliance
		 To ensure zero application of highly toxicity pesticides or herbicides To minimize soil destruction and reduce frequency of chemical and fertilizer application To substitute chemical to cultural and biological practices Repainting the workers/ staff and executive house 	
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 -	Estates within Boustead Telok Sengat Busniess Unit has established system to improve practices in line with new information and techniques or new industry standards and technology such as for Kulai Young Estate that has planned a new mechanization involved the use of Backpack Blower in estate field operation. Trial use has been kick started since February 2020.	Comply
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.	Kulai Young Estate has planned a new mechanization involved the use of Backpack Blower in estate field operation. Trial use has been kick started since February 2020.	Comply
	- Major compliance -		
4.2 Prin	ciple 2: Transparency		
Criterion	4.2.1 – Transparency of information and documents relevant	to MSPO requirements	
4.2.1.1	The management shall communicate 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.	Estates within Boustead Telok Sengat Busniess Unit has maintained records of request and response, land titles and OSH plans, complaints and grievances records that make available upon request.	Comply



Criterio	n / Indicator	Assessment Findings	Compliance
	- 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 or social outcomes. - Major compliance -	Estates within Boustead Telok Sengat Busniess Unit holds copies of each of the management documents that are required to be publicly available. Copies of the document such as documents related to environmental and social issues, waste management plan, records of complaints and grievances were available upon request. All the policies such as Pesticide Use Policy, Human Rights Policy and Foreign Workers Policy were publicly available in the company's website: www.bousteadplantations.com.my . Others sustainability practices were also available in the website.	Comply
Criterio	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 -	Estates within Boustead Telok Sengat Business Unit has developed Communication Procedure. The scope of the procedure is to handle communication for internal and external stakeholders. The methods of communication such as formally write in, through phone call, discussion or meeting etc. The communication is achieved through notice board, meeting minutes, trainings and newspapers. Complaint/ Suggestion Form and the Suggestion Box was implemented in the company.	Comply
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 -	Management official nominated responsible for stakeholders' communication and consultation are the estate managers.	Comply
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input	List of stakeholders available for both internal and external stakeholders identified by estates. Records of consultation and	Comply



Criterio	on / Indicator	Assessment Findings	Compliance
	from stakeholders should be properly maintained. - Major compliance -	communication maintained properly as per sample records for minutes of meeting of stakeholder consultation meeting latest conducted at Kulai Young Estate on 17/12/2019. Feedbacks and inputs from stakeholders were recorded and actions were taken for necessary issues. Other records of sampled communication maintained includes the following:	
		- DOSH visit log book; latest visit on 11/9/2019	
		- Borang Laporan Kerosakan Rumah; latest received on 12/10/2019	
		- Borang Aduan Masalah Pekerja; latest received on 14/10/2019	
Criterio	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). - Major compliance -	Estates within Boustead Telok Sengat Business Unit implemented the supply chain program based on Bousted Plantations MSPO Traceability Procedures; Issue 1; Issue date: July 2016; Rev. # 2; Rev. date: March 2918. The procedure was approved by MSPO Chairman which covering the implementation of all supply chain requirements for both POM and estate.	Comply
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Regular inspections on compliance with the established traceability system were conducted through periodical internal audit. Furthermore, the estate management and staff responsible to conduct related inspections on compliance of all operations including traceability system. Verification on site confirmed the inspections were regularly implemented accordingly.	Comply



Criterio	on / Indicator	Assessment Findings	Compliance
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	The procedure also specified that the Sustainability Chairman shall have the overall responsibility for the implementation of the procedure with assignment of relevant personnel from various departments to assist in the implementation. At Telok Sengat Business Unit, Mill Manger and Estate Manager responsible for the MSPO implementation.	Comply
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	Records of FFB sales & delivery including FFB Weighbridge Tickets together with FFB Delivery Note (Chit) and Daily Record (FFB Receiving Details Daily Report) were maintained. Sighted samples record available as following:	Comply
		- FFB weighbridge ticket # 101677; Supplier: Telok Sengat Estate; Field # PM97B; DO # TS97285; Net weight: 5,380 kg; Vehicle # JDN1024	
		- FFB weighbridge ticket # 101534; Supplier: Chamek Estate; Field # 00C, 01C, 98B, PM01/PM01A; DO # 3942; Net weight: 30,090 kg; Vehicle # JMR6789	
		- FFB weighbridge ticket # 101635; Supplier: Kulai Young Estate; Field # 13, PJ11, PM95; DO # 01586; Net weight: 17,750 kg; Vehicle # JMT6388	
4.3 Prin	ciple 3: Compliance to legal requirements		
Criterio	n 4.3.1 – Regulatory requirements		
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.	Estate operations are in compliance with the applicable local, state, national and ratified international laws and regulations. Legal	Comply



Criterio	on / Indicator	Assessment Findings	Compliance
	- Major compliance -	Requirement Register (LRR) Document No. SMP-GPB-22 (rev 06) was available for verification.	
		1) License from BAKAJ for extract surface water 07/A/KJ/005 dated 31 Dec 2019 valid until 31 Dec 2020	
		2) MPOB license 616050002000 was valid until 31 Dec 2020	
		3) Weighbridge calibration already been complete dated 12 Dec 2019 as per license B 1550921	
		4) MPOB license 613906002000 was valid until 31/7/2020	
		5) Salary deduction license from JTK referred PP3/29/254/2006 dated 1 August 2006	
		6) License for Diesel BPGK JH (KLU)2321 SK with total 7280liter	
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirement register. - Major compliance -	LORR was established to cover all legal acts, regulations and other requirement related to POM and supply base. The sample of Act and	Comply
		Legal:	
		1. Minimum Wages Order 2020	
		2. Sabah Labour Ordinance 1950	
		3. OSHA 1994	
		4. FMA 1967	
		5. Uniform Building By Law 1984	
		6. Pesticide Act 1974	
		7. Electrical Supply (Amendment) Act 2015	

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Criterio	on / Indicator	Assessment Findings	Compliance
		8. Fire Services Act 9. Environmental Quality Act 10. Local Government Act	
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	LORR was established to cover all legal acts, regulations and other requirement related to POM and supply base. The sample of Act and Legal.	Comply
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. - Minor compliance -	Tracking system available to identify changes in the relevant regulations through head office, sustainability team, website information and the information are communicated from the Head Office (Sustainability Section). Boustead Plantations Berhad have centralised system for tracking any changes in the law and subscribe into Lawnet. The latest updated was done on 15/7/2019.	Comply
Criterio	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. - Major compliance -	Estates within Boustead Telok Sengat Business Unit ensured that their oil palm cultivation activities do not diminish land use rights of others by operating strictly within own area. Telok Sengat Estate hold 66 land titles (under CIMB Islamic Trustee Berhad: - Grant No: #373, Lot 9071 - Grant No: #25899, Lot 1292 - Grant No: #101546, Lot 865 - Grant No: #25900, Lot 1293 - Grant No: #82693, Lot 396	Comply



Criterion / Indicator	Assessment Findings	Compliance
	Chamek Estate hold 5 land titles (under CIMB Islamic Trustee Berhad and Selangor Coconuts Bhd): Grant No: #96683, Lot 72 Grant No: #89011, Lot 266 Grant No: #89006, Lot 132 Grant No: #90629, Lot 181 Grant No: #90630, Lot 183 Kulai Young Estate total 5 land titles as per sample sighted as following: Title # 229629; Lot # 3564; Area: 103.3465 ha; Mukim: Kulai; Daerah Kulai; Reg. date: 2/1/2016 Title # HSD 64796; Lot # PTD 109033; Area: 563.33 ha; Mukim: Kulai; Daerah Kulai; Reg. date: 15/3/2016 Title # 64789; Lot # PTD 109026; Area: 0.28 ha; Mukim: Kulai; Daerah Kulai; Reg. date: 15/3/2016 Title # 64784; Lot # PTD 109021; Area: 0.19 ha; Mukim: Kulai; Daerah Kulai; Reg. date: 15/3/2016 Title # 64797; Lot # PTD 109034; Area: 0.05 ha; Mukim: Kulai; Daerah Kulai; Reg. date: 15/3/2016	
	For Chamek Estate, the management has changed the registry of companies a few times after Selangor Coconuts Bhd. The latest changes for registry of companies was done 10/4/2004 from Kuala Sidim Berhad to Boustead Plantations Berhad. The annual return of a company for Boustead Telok Sengat Sdn Bhd (Telok Sengat Estate and Telok Sengat POM) and Boustead Sungai Manar Sdn Bhd (Chamek Estate, Kulai Young Estate & Bekoh Estate)	



Criterio	on / Indicator	Assessment Findings	Compliance
		was sighted, where 100% of share under Boustead Plantations Berhad. The supplemental agreement between CIMB Trustee Berhad and Boustead Telok Sengat Sdn Bhd dated 5/3/2010 and between CIMB Trustee Berhad and Boustead Sungai Manar Sdn Bhd dated 5/3/2010 were sighted.	
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. - Major compliance -	Telok Sengat Estate hold 66 land titles (under CIMB Islamic Trustee Berhad: Grant No: #373, Lot 9071 Grant No: #25899, Lot 1292 Grant No: #101546, Lot 865 Grant No: #25900, Lot 1293 Grant No: #82693, Lot 396 Chamek Estate hold 5 land titles (under CIMB Islamic Trustee Berhad and Selangor Coconuts Bhd): Grant No: #96683, Lot 72 Grant No: #89011, Lot 266 Grant No: #89006, Lot 132 Grant No: #90629, Lot 181 Grant No: #90630, Lot 183 Kulai Young Estate total 5 land titles as per sample sighted as following: Title # 229629; Lot # 3564; Area: 103.3465 ha; Mukim: Kulai; Daerah Kulai; Reg. date: 2/1/2016	Comply



Criterio	n / Indicator	Assessment Findings	Compliance
		 Title # HSD 64796; Lot # PTD 109033; Area: 563.33 ha; Mukim: Kulai; Daerah Kulai; Reg. date: 15/3/2016 Title # 64789; Lot # PTD 109026; Area: 0.28 ha; Mukim: Kulai; Daerah Kulai; Reg. date: 15/3/2016 Title # 64784; Lot # PTD 109021; Area: 0.19 ha; Mukim: Kulai; Daerah Kulai; Reg. date: 15/3/2016 Title # 64797; Lot # PTD 109034; Area: 0.05 ha; Mukim: Kulai; Daerah Kulai; Reg. date: 15/3/2016 	
		For Chamek Estate, the management has changed the registry of companies a few times after Selangor Coconuts Bhd. The latest changes for registry of companies was done 10/4/2004 from Kuala Sidim Berhad to Boustead Plantations Berhad.	
		The annual return of a company for Boustead Telok Sengat Sdn Bhd (Telok Sengat Estate and Telok Sengat POM) and Boustead Sungai Manar Sdn Bhd (Chamek Estate, Kulai Young Estate & Bekoh Estate) was sighted, where 100% of share under Boustead Plantations Berhad.	
		The supplemental agreement between CIMB Trustee Berhad and Boustead Telok Sengat Sdn Bhd dated 5/3/2010 and between CIMB Trustee Berhad and Boustead Sungai Manar Sdn Bhd dated 5/3/2010 were sighted.	
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.	A legal boundary was clearly demarcated. Site visit to boundary at field PJ14/B (TSE) with smallholder, found that the boundary stone was maintained. Some area the management has constructed the trenches. At Chamek Estate (PM95A), the management had	Comply



Criterio	on / Indicator	Assessment Findings	Compliance
	- Major compliance -	constructed the trenches as a boundary between the estate and smallholders.	
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 and informed consent (FPIC). - Minor compliance -	There is no land dispute in the Telok Sengat Business Unit at the time of audit. The lands are leased from CIMB Trustee Berhad via verified with the land titles. There was no encroachment of land by the Telok Sengat Business Unit. Maps available as per sample UAV Mapping; Field Hectarage Statement by GPS Kulai Young Home Division.	Comply
Criterio	n 4.3.3 – Customary rights		
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	The estate lands are legally owned by the company. The existing estates are not encumbered by any customary land rights. The company has constructed trenches, wooden pegs and gates to differentiate the land boundaries. No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit.	Comply
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	The estate lands are legally owned by the company. The existing estates are not encumbered by any customary land rights. The company has constructed trenches, wooden pegs and gates to differentiate the land boundaries. No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit.	Comply
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available.	The estate lands are legally owned by the company. The existing estates are not encumbered by any customary land rights. The company has constructed trenches, wooden pegs and gates to	Comply



Criterio	on / Indicator	Assessment Findings	Compliance
	- Major compliance -	differentiate the land boundaries. No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit.	
4.4 Prin	ciple 4: Social responsibility, health, safety and emplo	byment condition	
Criterio	n 4.4.1: Social Impact Assessment (SIA)		
4.4.1.1	Social impact should be identified, and plans are implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	Social impact identified through Social Impact Assessment conducted by Malaysian Environmental Consultants Sdn. Bhd. as per report dated 29/6/2018. Assessment was conducted on 2-10/4/2018 with stakeholder consultations conducted on 21-22/5/2018.	Comply
Criterio	n 4.4.2: Complaints and grievances		
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	Telok Sengat Estate has developed Flowchart of Complaint/ Suggestion (Grievance Procedure) to receive the complaints from internal and external stakeholders. The flowchart has clearly stated the Social Officer will be receiving the complaints. Besides, the company has developed Whistleblowing Policy dated 11/1/2011 signed by Senior General Manager.	Comply
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. - Major compliance -	Complaint/ Suggestion Form was established and implemented in the estates to record any complaints from the stakeholders. The estate management has taken action to rectify the complaints and updated the actions taken in the form and Complaint Report Book. The complainant has acknowledged on the complaint form after the issue has been resolved by the management in Chamek Estate.	Comply



Criterio	on / Indicator	Assessment Findings	Compliance
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - Minor compliance -	Complaint/ Suggestion Form was implemented, and the empty form was available in the suggestion box area in front of the office in Telok Sengat Estate. Interviewed with the stakeholders confirmed that they are understood about the complaint procedure.	Comply
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance -	Consultation with the stakeholders confirmed that they are understood about the complaint procedure.	Comply
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request.	Complaints and resolutions records were documented and made available to affected stakeholders upon request since August 2018.	Comply
Critorio	- Major compliance -	anmont.	
Criterioi	1 4.4.3: Commitment to contribute to local sustainable develo	prinent	
4.4.3.1	Growers should contribute to local development in consultation with the local communities.	The management has made contribution to the local communities and workers such as donation to the school and temple activities upon	Comply
	- Minor compliance -	request by the stakeholders. Besides, the company has donated paint material to local authority. The company also provided job opportunity to the local communities.	
Criterio	1 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 OSH programme dated 4 Jan 2020 cover for OSH meeting, Training, WPI, HIRARC and others. Policy already been communicated	Comply



Criterio	on / Indicator	Assessment Findings	Compliance
	- Major compliance -	with workers and staff during OSH meeting and morning briefing. OSH Manual refer to OSH/001/2015 dated 7 Dec 2015.	
		Interview with staff and workers revealed that all working SOPs being consistently implemented among all employees and monitored by the management through daily muster briefing, training and etc.	
		OSH Policy dated 2 Dec 2019 already been communicated with workers and staff during OSH meeting and morning briefing. OSH Manual refer to OSH/001/2015 dated 7 Dec 2015.	
4.4.4.2	The occupational safety and health plan shall cover the following:	OSH Policy dated 2 Dec 2019 already been communicated with	Comply
	a) A safety and health policy, which is communicated and implemented.	workers and staff during OSH meeting and morning briefing. OSH Manual refer to OSH/001/2015 dated 7 Dec 2015.	
	b) The risks of all operations shall be assessed and documented.	In Kulai Young Estate, OSH meeting conducted quarterly by management, the latest record is dated 12 December 2019 and previously meeting record is on 26 September 2019 and 27 June 2019.	
	c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:	previously meeting record is on 20 September 2019 and 27 June 2019.	
	 i. all employees involved shall be adequately trained on safe working practices 	a) Safety and health policy was available dated 2 Dec 2019 already been communicated to employee dated 18 June 2019 as per training	
	ii. all precautions attached to products shall be properly observed and applied	record. b) The risk recorded under Hazard Identification Risk Assessment and	
	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).	Risk Control (HIRARC). This record covered from office activities until field maintenance activities and updated dated Jan 2020. For chemical in estate, Chemical Hazard Risk Assessment (CHRA) already been conducted by ENV Consultancy & Monitoring Services Sdn Bhd. dated September 2015.	



Criterion / Indicator	Assessment Findings	Compliance
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 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.	c) Awareness and training programme which includes the following requirements for employees exposed to pesticides was available under Training needs and plan record dated Jan 2020.Fro detail training been conducted can referred under indicator 4.4.6.2 d) Chamek Estate	
f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements. g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded. h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees. i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite. j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals. - Major compliance -	 Harvesting - the harvester was not wear PPE adequately (safety helmet) No first aid kit available during site visit to harvesting area (PM00C) Telok Sengat Estate The PPE for worker working at height was not adequately implemented As per verification fro the last audit finding as per above,in estate been visit, the ppe was adequately been using by harvester as per site verification in PM95B. The workers was aware regarding PPE and First aid also available during audit. For the working at height at Chamek estate the harness already been apply at FFB weighbridge area according to their HIRARC and recommendation. e) The management already establish Standard Operating Procedure for handling of chemical to ensure proper and 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, This can referred OSH Manual refer to OSH/001/2015 dated 7 Dec 2015. 	



Criterio	on / Indicator	Assessment Findings	Compliance
		f) The management have appoint manager as responsible person(s) for workers' safety and health verified per Safety Organization chart. The appointed person already attend the training according to OSH training needs and plan.	
		g) The management was conducted the regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Latest record sighted conduct on 23 Dec 2019, this meeting periodically conduct and previously was on 24 Sept 2019 and 24 June 2019.	
		h) Accident and emergency procedure were established to include emergency evacuation, fire situation, chemical spillage, accident at work place.	
		i) The Employee already been trained in First aid as per verification during site visit and interview session. The latest training was done on Nov 2019.	
		j) The record of accident was available sampling JKKP 8 is available for Chamek estate, dated send on 9 Jan 2020, 1 case has been reported as per JKKP 6 dated 23 Nov 2019 with total LTI 11 days.	
Criterio	n 4.4.5: Employment conditions		
4.4.5.1	The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.	Boustead Plantations Berhad has developed Human Rights Policy dated 11/1/2016 signed by Senior General Manager. The company is committed to ensure every individual are treated with fairness, dignity and respect. The company will respect the rights of every individual. They also recognize their responsibilities to respect human rights and	Comply



Criterio	on / Indicator	Assessment Findings	Compliance
	- Major compliance -	avoid complicity in human rights abuses. Latest training of the policy was conducted on 29/7/2019 in Telok Sengat Estate. Seen the training attendance list and photo of the training. Besides, the policy was publicly displayed at the notice board outside the office.	
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - Major compliance -	Boustead Plantations Berhad has established Equal Opportunities Policy dated 11/1/2011 signed by Senior General Manager. The company will ensure all the relevant parties will be treated equally and no discrimination based on race, caste, nationalities, religion, gender, age etc. Interviewed with the workers from different nationalities, gender and age confirmed that no discrimination was occurred in the estate.	Comply
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.	There were employment contracts for workers. Pay and conditions are documented and are above the Minimum Wage Order 2020. Employment contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker as per samples as following:	Comply
	- Major compliance -	Kulai Young Estate:	
		- Employee # 2951H; Date joined: 1/7/2017; Post: Crèche Ayah	
		- Employee # 2958A; Date joined: 1/7/2019; Post: Watchmen	
		- Contractor (Cipta Melati Enterprise) Employee ID # B5783219; Date joined: 24/4/2011; Post: Harvester	
		- Contractor (Cipta Melati Enterprise) Employee ID # B7193861; Date joined: 16/7/2017; Post: Harvester	



Criterion / Indicator	Assessment Findings	Compliance
	- Contractor (Cipta Melati Enterprise) Employee ID # B3624666; Date joined: 29/7/2013; Post: Harvester	
	Chamek Estate:	
	- Employee # 2123B; Date joined: 1/6/1995; Post: Auxiliary Police	
	- Employee # 0521H; Date joined: 1/3/2010; Post: Harvester	
	- Employee # 557S; Date joined: 1/3/2010; Post: Harvester	
	- Contractor (Perusahaan Mewah Hijau) Employee ID # B3765591; Date joined: 24/4/2011; Post: Harvester	
	- Contractor (Perusahaan Mewah Hijau) Employee ID # AU161915; Date joined: 16/7/2017; Post: Harvester	
	- Contractor (Lokman Baba Resources) Employee ID # C06995112; Date joined: 29/7/2013; Post: Harvester	
	Telok Sengat Estate:	
	- Employee # 2874A; Date joined: 1/11/2011; Post: Auxiliary Police	
	- Employee # 2882J; Date joined: 1/4/2014; Post: Harvester	
	- Employee # 2868F; Date joined: 3/10/2011; Post: Harvester	
	- Contractor (Cipta Melati Enterprise) Employee ID # AU226215; Date joined: 24/4/2011; Post: Harvester	
	- Contractor (Cipta Melati Enterprise) Employee ID # AU187928; Date joined: 16/7/2017; Post: Harvester	
	- Contractor (Cipta Melati Enterprise) Employee ID # AU226215; Date joined: 29/7/2013; Post: Harvester	



Criterio	on / Indicator	Assessment Findings	Compliance
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. - Minor compliance -	However, based on samples sighted above, it was found that information in contractor workers' payslip was insufficient for management to ensure workers paid based on legal/industry minimum standards according to the employment contract agreed between the contractor and his employee for following samples: Kulai Young Estate pay slip for contractor's employees as per following - Cipta Melati Enterprise Employee ID # B5783219; Date joined: 24/4/2011; Post: Harvester - Cipta Melati Enterprise Employee ID # B7193861; Date joined: 16/7/2017; Post: Harvester - Cipta Melati Enterprise Employee ID # B3624666; Date joined: 29/7/2013; Post: Harvester	Minor NC
4.4.5.5	The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. - Major compliance -	All the direct employment workers will be registered in the Masterfile Proof List and Labour Registers where personal details such as name, nationality, date of employed, job offered, salary and date of birth was stated in the list. The details for the contractors' workers are registered in the Workers Registration Form in estates' office.	Comply
4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records. - Major compliance -	Employment contracts for checkroll workers were acknowledged and kept a copy by the workers verified through interviewed with the workers. The contract was in the language that understood by the workers. The terms and conditions were clearly stated in the contract such as salary, annual leaves and public holiday entitlement, rate of	Comply



Criterio	n / Indicator	Assessment Findings	Compliance
		work on rest day and overtime. Sampled of employment contracts sighted as per indicator 4.4.5.3 above.	
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.	The estate management has maintained Field & General Workers Daily Attendance Record and Bunches Record to record the attendance, tonnage, overtime etc. for individual checkroll workers.	Comply
	- 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 working hour and break time have been clearly stated in the employment contract. Besides, the attendance record was available and able to trace through Field & General Workers Daily Attendance Record.	Comply
	- 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.	Documented payslip was distributed to individual workers on the day of payment. Wages and overtime were paid according to the "Field & General Workers Daily Attendance. Total hours of overtime and daily attendance has recorded in the checkroll book. Payslips sighted for	Comply
	- Major compliance -	sample workers as per indicator 4.4.5.3 above. Except for findings in indicator 4.4.5.4, it was confirmed that workers achieved the Minimum Wage Order 2020. Hours of overtime has recorded in the payslip as well.	
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions.	The management provided free medical facilities to all the workers and dependents. The company also subsidized water and electricity to certain units.	Comply



Criterio	n / Indicator	Assessment Findings	Compliance
	- Minor 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 -	Based on the Workers' Minimum Standards Housing and Amenities (Amendment) Act 2019, line-site housing areas were inspected at least twice a month and inspection report were documented in "Line Site Inspection Log book". Sighted sample latest inspection was carried out by Hospital Assistant – Mr. Zayuri Mohd Noor on 18.04.2019 in Telok Sengat Estate.	Comply
4.4.5.12	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	Boustead Plantations Berhad has developed a Sexual Harassment Policy signed by Senior General Manager, En. Shoib Abdullah dated 11/1/2011. The company will ensure the comfort and security of every employee, clients, business partners and public that involved in the plantations' activities. The policy has clearly stated the types of sexual harassment such as verbal, visual, psychology, physical etc. Gender committee for Telok Sengat Estate and Mill is combined with participation from both side; lead by the chairperson Pn. Zaliha Bt Ahmad and AJK – Pn Masitah Bte Said. Meeting minutes dated 17.01.2019 was held at Telok Sengat Estate, meeting minutes sighted. Topic discussed includes, election of the committee to be done biannually, proposal of activities, stray dogs, etc. Meeting was also held dated on 09.07.2019.	Comply
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	Boustead Plantations Berhad has developed Freedom of Association Policy dated 11/11/2011 signed by Senior General Manager, En. Shoib Abdullah. The company is committed and allowed their stakeholders such as employees, clients, business partner etc. to form or join any association. Consultation with both the local and foreign workers confirmed that they are free to join NUPW. Sample sighted for NUPW	Comply



Criterio	n / Indicator	Assessment Findings	Compliance
	work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. - Major compliance -	local committee meeting that was latest conducted out on 24.06.2019 in Telok Sengat Estate, where election of the committee was held.	
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not exposed to hazardous working conditions. - Major compliance -	Boustead Plantations Berhad has developed Employment of Child and Age Limit Policy dated 11/1/2011. The company will comply with the Children and Young Persons (Employment) Act 1966 and ILO Convention 138 (1973) Article 1-3. No workers less than 16 years old will be recruited and less than 18 years old for hazardous work. Document verified on the Employee Master List confirmed that all the workers employed were above 18 years old.	Comply
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	A formal training programme on all aspects of MSPO was established and implemented. Training for various categories of operators, including all field and office staff, with regards to individual duties and training needs were reviewed and found to be complied.	Comply
	shall be kept. - Major compliance -	Training programme planned for year 2019 was consistently implemented. The programme includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to:	
		- workers exposed to machinery and high noise levels,	
		- workers working in confined space,	
		- harvesters	



Criterio	on / Indicator		Assessment Finding	js	Compliance
		- pesticides operators			
		- manurers			
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.	established and imple operators, including all	formal training programme on all aspects of MSPO was been stablished and implemented. Training for various categories of perators, including all field and office staff, with regards to individual uties and training needs were reviewed and found to be complied.		
	- Major compliance -	Date	Training	Remarks	
		Kulai Young Estate			
		2 Jan 2020	First Aid Training	Attended by staff	
		12 Dec 2019	Fire Fighting	Attended by Staff and workers	
		1 Jan 2019	Harvesting Training	Attended by Staff and workers	
		15 Oct 2019	Pesticide handling training	Attended by Staff and workers	
		14 Nov 2019	Rat Baiting Training	Attended by Staff and workers	
		Chamek Estate			



Criterion / Indicator		Assessment Findings		
	18 June 2019	Company Policy Training	Attended by Management team, staff and workers	
	13 May 2019	Integrated Pest Management Training	Attended by staff	
	20 June 2019	Scheduled waste Training	Attended by staff	
	29 June 2019	Triple rinsing and recycle programmed training	Attended by Staff and workers	
	2 April 2019	Soil erosion & Buffer zone training	Attended by Staff and workers	
	11 Oct 2018	First Aid training with CPR by Bulan Sabit Merah Malaysia	Attended by staff	
	24 Oct 2018	Emergency response training by Bomba	Attended by Management team, staff and workers	
	Telok Sengat Esta	te	1	



Criterio	Criterion / Indicator		Assessment Findings		
		17 Feb 2020	SOP and Harvesting Training	Attended by staff and workers	
		10 March 2020	Chemical handling training	Attended by staff and workers	
		11 Oct 2018	First Aid training with CPR by Bulan Sabit Merah Malaysia	Attended by staff	
		24 Oct 2018	Emergency response training by Bomba	Attended by Management team, staff and workers	
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.	The continuous training has been programme according to training needs and plan 2019. This also to ensure that all employee is well trained on their job function accordingly. Sampling Record can refer as per indicator 4.4.6.2		at all employee is well	Comply
	- Minor compliance -				
4.5 Prin	ciple 5: Environment, natural resources, biodiversity	and ecosystem serv	ices		
Criterio	n 4.5.1: Environmental Management Plan				
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.	Based on the <i>Polisi Alam Sekitar & Biodeversiti</i> (Environmental & Biodiversity Policy); dated 2 Dec 2019; signed by Senior GM of Bousted Estates Agency Sdn Bhd, the HCV Management Plan has been established as 4 objectives as following:			Comply



Criterion / Indicator	Assessment Findings	Compliance
- Major compliance -	i) Wild Life Conservation	
	Target: to ensure no illegal hunting activities inside or outside the estate perimeter in line with the Protection of Wild Life Act 1972	
	Action plan: monitoring records of hunting incidences; collaboration with estate workers; local people and stakeholders such as neighboring estate to investigate the extent and reasons for hunting and their awareness; training of estate personnel especially Aps in anti-poaching measures; working closely with local authorities such as Perhilitan to highlight and curtail any illegal activities.	
	ii) Waterways Quality and Health Monitoring	
	Target: to ensure recommended WQI index met a range of 81 to 100%	
	Action plan: prohibit manuring and herbicide spraying at any point in buffer zone; prohibit application of herbicide/insecticide which classified as highly toxicity chemical; continue application of EFB as substitute fertilizers; monitoring the use of oil and chemical trap constructed to avoid chemical flowing into water source	
	iii) Agricultural Land Contamination	
	Target: to continuously establish and enhance in-estate buffers	
	Action plan: establish 3m buffer zone adjacent to forest reserve; continue the in-estate program of establishment and enhancement of riverine buffer zones; continue planting of wild/natural species of hard word along identified water courses, wetland and biodiversity area	



Criterio	on / Indicator	Assessment Findings	Compliance
		iv) Degradation of Agricultural Land Target: to minimize or free from soil erosion at slope/terrace area Action plan: planting LCC such as Pueraria Javanica at along slopes and Mucuna Bracteata; construct terrace at slope area >25o; continue constructing silt pits; conservation of Nephorolepis Biserrata; prohibit spray at any points of sloping banks; continue setting up buffer zone; planting certivar/Guatemala grasses; construct and maintain well drainage system; continue plant timer trees especially in buffer zone area The above programs were regularly communicated by estate management to all employees from time to time during routine workers assembly. The recent specific environmental and biodiversity	
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations. - Major compliance -	policy briefing was conducted on 6-7 Nov 2019 and continuously until for year 2019 attended by all estate staff and employees. On top of the above biodiversity management plan and objectives, the environmental management plan covered in the established action plan of significant environmental aspects identified and impacts evaluated as per documents sighted as following: - Environmental Aspect and Impact Identification 2020/2021; Serial # EAI/2020/03-03 to EAI/2020/013-4 dated 14 Jan 2020 - Environmental Impact Evaluation Form Serial # EIE/2020/001-1 to EIE/2020/014-4 dated 14 Jan 2020 In estate no changes and same as previous year because no new activity and already covered in aspect and impact.	Comply



Criterio	on / 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 developed environmental improvement plan to mitigate the negative impacts and to promote the positive ones were effectively implemented and monitored.	Comply
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Few environmental plans were established (environmental management plan and waste management plan). The plan was as follow: - To ensure water quality meets the environmental quality act 1974 - To ensure the slope/ terracing area minimum or free facing soil	Comply
		 erosion and to keep buffer zone without chemical activity. To ensure zero application of highly toxicity pesticides or herbicides To minimize soil destruction and reduce frequency of chemical and fertilizer application 	
		 To substitute chemical to cultural and biological practices To reduce conserve soil fertility To recycle waste such as to recycle empty container as recycle waste after triple rinsing or reuse back as chemical container for spraying activity. 	
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	The above programs were regularly communicated by estate management to all employees from time to time during routine workers assembly. The recent specific biodiversity and environmental	Comply



Criterion / Indicator		Assessment Findings		Compliance
	objectives Major compliance -		une 2019. For other training such as other can refer in training indicator.	
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	Specific Environmental Aspects & Impacts reviews were conducted annually at each operating unit. Briefings were done as part of the environmental management plan on regular basis including during workers daily muster briefing and weekly assembly. The latest meeting was conducted on 24 Sept 2019.		Comply
Criterio	n 4.5.2: Efficiency of energy use and use of renewable energy	ју		
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.	consumption/FFB produced can refer to indicator 4.5.2.2		Comply
	- 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.	estimation was compared to the actual usage by monthly and reported to the head office for monitoring. The record of Diesel		Comply
	- Major compliance -	Estate	Liter/FFB (Diesel)	
		Kulai Young estate	1.97	



Criterio	Criterion / Indicator Assessment Findings		nt Findings	Compliance
		Chamek estate	2.09	
		Telok Sengat estate	2.65	
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	No renewable energy at applicati Business Unit except for mill only.	Comply	
Criterio	n 4.5.3: Waste management and disposal			
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	All waste products and sources of pollution had been identified in Waste Management Action Plan Year 2020 for the estate. Based on the Waste Management Action Plan Year 2020 the following wastes and its sources were identified:		Comply
	. a.jo. compilation	Domestic waste: Rubbish fromScheduled waste: SW305, SW4	linesite, office etc. at Field PM01B 09 &SW 410 ical container, empty fertilizer bag,	
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:	As above, all waste products and sources of pollution had been identified in Waste Management Action Plan Year 2020 for the estate. Site visit confirmed that the practice of reduce, reuse and recycle of		Comply
	a) Identifying and monitoring sources of waste and pollution	materials has been implemented.		
	b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products	Segregation of wastes i.e. general wastes and scheduled wastes were verified to be satisfactory. Proper storage areas were identified for the storage of the recyclable wastes at the estate.		
	- Major compliance -			



on / Indicator	Assessment Findings	Compliance
The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. - Major compliance -	Visit to estate field and premises shown the management and disposal plan has been implemented accordingly. Records has been maintained by relevant person in-charge. Sighted during site verification in Chamek estate, the labelling of scheduled waste was available accordingly. The inventory can refer 01IU78X0 dated Jan 2020 show date of generate was accordingly to regulation requirement	Comply
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 -	Estate conducted the Triple Rinsing of Empty Chemical Container Training (Latihan 3 Kali Pembilasan Bekas Racun dan Bahan Kimia) on 29 June 2019 to all sprayers gang for both divisions based on the guideline for used plastic pesticide container recycling program (UPPCRP). Visit to estates confirmed that all pesticides stored at chemical store where empty chemical containers have been tripling rinsed and punctured. The containers were collected by G-Planter for recycle purposes.	Comply
Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. - Minor compliance -	The management used to segregate the waste, i.e. general wastes and scheduled wastes was verified to be satisfactory. Proper storage areas were identified for the storage of the recyclable wastes. Domestic waste disposal was done in landfill within estates field such as at Field PM01B for Chamek Estate.	Comply
	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 - 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 watercourses.	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 - 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 - Estate conducted the Triple Rinsing of Empty Chemical Container Training (Latihan 3 Kali Pembilasan Bekas Racun dan Bahan Kimia) on 29 June 2019 to all sprayers gang for both divisions based on the guideline for used plastic pesticide container recycling program (UPPCRP). Visit to estates confirmed that all pesticides stored at chemical store where empty chemical containers have been tripling rinsed and punctured. The containers were collected by G-Planter for recycle purposes. - Major compliance - Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. - Minor compliance - Domestic waste disposal was done in landfill within estates field such



Criterio	on / Indicator	Assessment Findings	Compliance
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.	Based on the assessment done by the estate of all polluting activities as of the Environment Aspect and Impact assessment, identified sources were fertilizer, diesel and pesticide chemicals.	Comply
	- Major compliance -		
4.5.4.2		Action plan to reduce identified significant pollutants including IPM implementation, empty chemical container & empty fertilizer bags	Comply
	- Major compliance -	recycle.	
Criterio	n 4.5.5: Natural water resources		
4.5.5.1	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:	a) Documented Water Management Plan Year 2020 inclusive of location; wastewaters produced; treatment/containment method;	Major NC
		reuse/recycle/disposal method was sighted. The plan implemented as	
	a. Assessment of water usage and sources of supply.	per following:	
	b. Monitoring of outgoing water which may have negative	- Identification of water sources	
	impacts into the natural waterways at a frequency that	- Efficient use of water	
	reflects the estate's current activities.	- Renewability of water sources	
	c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application,	- Riparian buffer zone	
	maintenance of equipment to reduce leakage, collection of rainwater, etc.). d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at	- Areas where buffer zone not established	
		- Water quality monitoring	
		- Effluent analysis	
		- Demarcation of wetlands areas	

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Criterio	on / Indicator	Assessment Findings	Compliance
	or before planting or replanting, along all natural waterways within the estate. e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented. 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 -	 Soil and water conservation measures No construction of bunds/weirs/dam across main rivers b) The monitoring of outgoing water was not available in Kulai Young estate during audit. From the HCV report by MEC dated July 2018, estate was need to monitor the water quality which may have negative impacts into the natural waterways. Thus, Major NC been raised c) As per water management plan, estate already include the ways to optimize water and nutrient usage to reduce wastage such as recycle water was using as chemical mixture. d) During site visit in PB 14B, the waterways were keep maintaining and restoring appropriate riparian buffer zones. No chemical activity was sighted. e) No sighted of natural vegetation in riparian areas has been removed. f) In Kulai Young estate, they are using rain water harvesting (pond) in estate as water source verified referred License from BAKAJ for extract surface water 07/A/KJ/005 dated 31 Dec 2019 valid until 31 Dec 2020 	
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance -	As per visit to estate field confirmed no construction of bunds, weirs and dams across main rivers or waterways passing through an estate.	Comply
4.5.5.3	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in	The estate practice water harvesting at strategic locations. They also maintained monitoring records of water usage which recorded every day and summarized on monthly basis including the monitoring of	Comply



Criterio	on / Indicator	Assessment Findings	Compliance
	conservation terraces and various natural receptacles). - Minor compliance -	rainfall water, which has been an alternative source of water as mitigation plan during draught season.	
Criterio	n 4.5.6: Status of rare, threatened, or endangered species ar	nd high biodiversity value	
4.5.6.1	Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover: a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. b) Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities. - Major compliance -	The HCV assessment was done by the Malaysia Environmental Consultant on 2-10/4/2018, however the report yet to be received by the management. On ASA 1 audit the report of HCV was available dated July 2018 in all operating unit. This report includes Telok Sengat Estate, Kulai Young Estate, Chamek Estate, Eldred Estate, and Bekoh Estate with total hectarage 8,3337.94 Ha. As per report total HCV area was 279.18 ha.	Comply
4.5.6.2	If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include: a) Ensuring that any legal requirements relating to the protection of the species are met. b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.	The management plan was available referred as per Table 6.2 Recommendation for managing and monitoring identified threats to HCV from HCV report by Malaysian Environmental Consultants (MEC) 20 July 2018.	Comply



Criterio	on / Indicator	Assessment Findings	Compliance
	- Major compliance -		
4.5.6.3	established and effectively implemented, if required. - Major compliance -	signed by Senior GM of Bousted Estates Agency Sdn Bhd, the HCV Management Plan has been established as 4 objectives as following:	Comply
		i) Wild Life Conservation	
		Target: to ensure no illegal hunting activities inside or outside the estate perimeter.	
		Action plan: monitoring records of hunting incidences; collaboration with estate workers; local people and stakeholders such as neighboring estate to investigate the extent and reasons for hunting and their awareness; training of estate personnel especially APs in anti-poaching measures; working closely with local authorities such as Perhilitan to highlight and curtail any illegal activities.	
		ii) Waterways Quality and Health Monitoring	
		Target: to ensure recommended WQI index met a range of 81 to	
		100%	
		Action plan: prohibit manuring and herbicide spraying at any point in buffer zone; prohibit application of herbicide/insecticide which classified as highly toxicity chemical; continue application of EFB as substitute fertilizers; monitoring the use of oil and chemical trap constructed to avoid chemical flowing into water source.	
		iii) Agricultural Land Contamination	



Criterion / Indicator		Assessment Findings		Compliance
Criterio	n 4.5.7: Zero burning practices	continue the in-estate program of	zone adjacent to forest reserve; establishment and enhancement of nting of wild/natural species of hard	
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. - Major compliance -	O.P.C. No. 51.c – July 1999 whe burning unless there were incident		Comply
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.	during replanting Honge no enecis	no use of fire for land preparation al application made, and no approval	Comply



Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws.	The visit to estate field confirmed no use of fire for land preparation during replanting. Hence, no special application made, and no approval granted.	Comply
	- Major compliance -		
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.	The visit to estate field confirmed no use of fire for land preparation during replanting. Hence, no special application made, and no approval granted.	Comply
	- Minor compliance -	granted.	
	ciple 6: Best Practices n 4.6.1: Site Management		
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	Boustead Plantations Bhd has established the agriculture manual (Oil Palm Circular) covers felling and clearing, planting material, weeding, lallang, manuring, pest & disease, census & thinning out, drains, road & bridges, soil/water conservation, boundaries, fences & survey, supplying, pruning, collection (harvesting), external transport etc. This been verified during site verification and all according to company Standard Procedure.	Comply
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	The implementation in estate was consistent with the Quality Assurance Manual and Work Instruction. Sighted Internal Audit report which was conducted once a year by Sustainability section, the 1 st	Comply



Criterio	on / Indicator	Assessment Findings	Compliance
	either soil, nutrients or chemicals. - Major compliance -	internal audit was conducted accordingly to cover the entire criterion stated in the standard and SOP.	
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	Field marking was sighted at state visited. They are using palm trunk or sign board to identify the field.	Comply
Criterio	n 4.6.2: Economic and financial viability plan		
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	Boustead Plantations Berhad has implemented a management system for monitoring and reporting of performance against production targets for achieving long-term economic and financial viability.	Comply
4.6.2.2	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years.	The earlier planting was in year 1995 and the next replanting would be in year 2020. Replanting programme planning has established until year 2025.	Comply
	- Major compliance -		
4.6.2.3	The business or management plan may contain:	From the estate visited, each estate has an annual operating budget for the calendar year 2019 and five-year projections (2019 - 2023) for	Comply
	a) Attention to quality of planting materials and FFB	production. The plan includes age profile, yield projection and cost per	
	b) Crop projection: site yield potential, age profile, FFB yield trends	tonne of FFB production etc. CAPEX for Year 2020 are such as perimeter fencing for staff quarters and purchase one unit of Kubota tractor.	
	c) Cost of production: cost per tonne of FFB	tractor.	



Criterio	on / Indicator	Assessment Findings	Compliance
	d) Price forecast e) Financial indicators: cost benefit, discounted cash flow, return on investment - Major compliance -		
4.6.2.4	The management plan shall be effectively implemented, and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. - Major compliance -	Bosutead Plantations Berhad has monitored the estate performance against the estimates. They have monitored the performance through Estate Weekly Report and action plan was developed if necessary.	Comply
Criterio	n 4.6.3: Transparent and fair price dealing		
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	Pricing mechanism for estates within Telok Sengat Business Unit mainly involved contracts for harvesting work, transportation of workers and FFB. Sighted that contracts available in documented information being signed and agreed by both parties that covers the pricing/pay rate, payment terms, terms and condition, areas of services, etc. Contracts found renewed annually and are paid promptly according to the terms.	Comply
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Contracts are fair, legal and transparent as per sample sighted as following: - Boustead Plantations Berhad Memorandum of Agreement Chamek Estate; FFB Harvesting Contract; Contractor: Lokman Khalid Baba Resources; Contract Agreement Serial Number: Contract Agreement 2 2020; Duration: 1/1/2020 -31/12/2020	Comply



Criterio	on / Indicator	Assessment Findings	Compliance
		- Boustead Plantations Berhad Memorandum of Agreement Chamek Estate; FFB Harvesting Contract; Contractor: Perusahaan Mewah Hijau; Contract Agreement Serial Number: Contract Agreement 3 2020; Duration: 1/1/2020 -31/12/2020	
		Consultation with stakeholders among estate vendors and contractors confirmed that agreed payments were made in timely manner by estates.	
Criterio	n 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.	Sampled contract agreements (as per indicator 4.6.3.2 above) were included with a special clause on MSPO compliance required for the contractor upon award.	Comply
	- Major compliance -		
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor.	The contractors have signed on the contract agreement prior to provide services. Seen the contract agreement and details as refer to Criterion 4.6.3.2.	Comply
	- Major compliance -	Citerion 4.0.5.2.	
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.	Boustead Plantations Berhad has agreed for BSI auditors to verify the assessment through a physical inspection if required.	Comply
	- Minor compliance -		
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.	The contractor will issue the working chit for every work done on daily basis as stated in the contract agreement. During the month end, the contractor will issue the tax invoice to the company for all the work done to proceed for payment.	Comply

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Criterion / Indicator	Assessment Findings	Compliance
- Major compliance -		
4.7 Principle 7: Development of new planting		
Telok Sengat Business Unit- No new planting.		



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

Criterio	on / Indicator	Assessment Findings	Compliance		
4.1 Prin	4.1 Principle 1: Management commitment & responsibility				
Criterio	n 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy				
4.1.1.1	Policy for the implementation of MSPO shall be established. - Major compliance -	The MSPO Policy was established where the policy was signed by Chief Executive Officer of Boustead Plantations Berhad dated 9/12/2019.	Comply		
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - Major compliance -	The policy was emphasized on the engagement and commitment to produce sustainable palm oil with the objective of improving the milling and estate operation.	Comply		
Criterio	n 4.1.2 – Internal Audit				
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Internal audit was planned and conducted on annual basis by internal auditors from Boustead Plantations HQ sustainability unit. Latest internal audit was conducted on 30/9/2019 – 2/10/2019 at Telok Sengat Mill by a team led by Azrin Mazhidi Abdul Manab assisted by Kamaroladzha Othman and Muhammad Hazim Kamarudin. 3 Major NC raised in Telok Sengat Mill were verified closed by internal auditors on 24/10/2019. Sighted the Lead Auditor training certificate for completion of MSPO Lead Auditor Course held on 25-29/6/2018; Cert. # 55784.	Comply		



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; SOP Issue 1; Date of issue: July 2016 was established by the management to include audit frequency, audit schedule, audit team, performing audit, audit responsibility etc. Internal audit shall be carried out once a year.	Comply
	- Major compliance -		
4.1.2.3	Reports shall be made available to the management for their review.	All records related to Internal Audit was maintained and available for review at the mill.	Comply
	- Major compliance -	To Teview at the Itilii.	
Criterion	1 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.	Latest management review meeting was conducted on 28/11/2019 chaired by Planting Director as a Sustainability Chairman and attended by Visiting Engineer, Sustainability personnel and all operating units' managers and assistant managers including the	Comply
	- Major compliance -	mill.	
Criterion	1 4.1.4 — Continual Improvement		
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company.	Telok Sengat POM has developed a Continual Improvement Plan for 2020 as below: - To ensure BOD below 100ppm at final discharge - To upgrade from single pass opacity to double pass opacity	Comply
	- Major compliance -	- Reduce GHG emission	
ŀ		- To capture and remove dust emissions	



Criterio	on / Indicator	Assessment Findings	Compliance
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.	 To monitor smoke emissions from boiler and diesel genset operation Telok Sengat POM has developed a Continual Improvement Plan for 2020 as below: To ensure BOD below 100ppm at final discharge To upgrade from single pass opacity to double pass opacity 	Comply
	- Major compliance -	 Reduce GHG emission To capture and remove dust emissions To upgrade existing empty bunch hopper drainage system To monitor smoke emissions from boiler and diesel genset operation 	
	4.2.1 – Transparency of information and documents relevant to	MSPO requirements	
4.2.1.1	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.	The company has maintained records of request and response, MSPO procedures, authority visit books (DOSH & DOE), complaints and grievances records that was made available upon request.	Comply
	- Major compliance -		
4.2.1.2	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.	Telok Sengat POM situated within Telok Sengat Estate land area. Estates within Boustead Telok Sengat Business Unit holds copies of each of the management documents that are required to be publicly available. Copies of the document such as documents related to environmental and social issues, waste management plan, records	Comply
	- Major compliance -	of complaints and grievances were available upon request. All the policies such as Pesticide Use Policy, Human Rights Policy and Foreign Workers Policy were publicly available in the company's	



Criterio	on / Indicator	Assessment Findings	Compliance
		website: www.bousteadplantations.com.my . Others sustainability practices were also available in the website.	
Criterio	n 4.2.2 - Transparent method of communication and consultation	on	
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance - Telok Sengat POM has developed Communication Procedure. The scope of the procedure is to handle communication for internal and external stakeholders. The methods of communication such as formally write in, through phone call, discussion or meeting and etc. The communication is achieved through notice board, meeting minutes, trainings and newspapers. Complaint/ Suggestion Form and the Suggestion Box was implemented in the company.		Comply
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . - Minor compliance -	Telok Sengat POM has established a Complaint Committee to handle external and internal communication/ complaint in the estate. Fruit Supervisor has been appointed as Secretary of Complaint Committee and Social Officer in mill to handle complaints. Appointment letter dated 2/1/2017 was sighted.	Comply
4.2.2.3	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained.	Stakeholder list was developed in Telok Sengat POM. The list has included government authorities such as DOE, DOSH and BOMBA, contractors and suppliers, local communities and NGOs.	Comply
	- Major compliance -	External stakeholder meeting for Telok Sengat POM was conducted simultaneously with Estate on 21.05.2018 with participation from internal and external stakeholder such as Police department, external grower, schools, consultant, fire department, head of village, etc. Issues noticed being discussed and concern raised by stakeholders are documented in the meeting minute (Sesi(2)2018).	



Criterio	on / Indicator	Assessment Findings	Compliance	
		E.g. school seeking mill to assist spraying at the perimeter, removal of old trees, etc.		
Criterio	n 4.2.3 – Traceability			
4.2.3.1	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. - Major compliance - Telok Sengat POM implemented the supply chain program based on Bousted Plantations MSPO Traceability Procedures; Issue 1; Issue date: July 2016; Rev. # 2; Rev. date: March 2918. The procedure was approved by MSPO Chairman which covering the implementation of all supply chain requirements for both POM and estate.			
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Regular inspections on compliance with the established traceability system were conducted through periodical internal audit. Furthermore, the mill management and staff responsible to conduct related inspections on compliance of all operations including traceability system. Verification on site confirmed the inspections were regularly implemented accordingly.	Comply	
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system. - Minor compliance -	The procedure also specified that the Sustainability Chairman shall have the overall responsibility for the implementation of the procedure with assignment of relevant personnel from various departments to assist in the implementation. At Telok Sengat Business Unit, Mill Manager and Estate Manager responsible for the MSPO implementation.	Comply	
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -	Records of storage, sales, delivery or transportation of CPO & PK were maintained as per sample sighted as following:	Comply	
	Piajor compilance	- CPO dispatch ticket # 103228; Customer: PGEO Edible Oils Sdn. Bhd.; DO # CPO 1232020; Net weight: 34,280 kg; Vehicle # WGW995/T/JJ1607		

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Assessment Findings	Compliance
 PK dispatch ticket # 103023; Customer: PGEO Oil Mill Sdn. Bhd.; DO # PK 123202006239; Net weight: 40,100 kg; Vehicle # JHH2621/7679 	
FFB incoming records also maintained for own and external FFB supplies as per sample as following:	
- FFB weighbridge ticket # 101677; Supplier: Telok Sengat Estate; Field # PM97B; DO # TS97285; Net weight: 5,380 kg; Vehicle # JDN1024	
- FFB weighbridge ticket # 101765; Supplier: Guntung Division; Field # PM04A; DO # G04585; Net weight: 10,050 kg; Vehicle # JMX7794	
- FFB weighbridge ticket # 101534; Supplier: Chamek Estate; Field # 00C, 01C, 98B, PM01/PM01A; DO # 3942; Net weight: 30,090 kg; Vehicle # JMR6789	
- FFB weighbridge ticket # 101635; Supplier: Kulai Young Estate; Field # 13, PJ11, PM95; DO # 01586; Net weight: 17,750 kg; Vehicle # JMT6388	
- FFB weighbridge ticket # 101641; Supplier: Tanjong Buai Oil Palm; Field # 90; DO # 4009; Net weight: 1,880 kg; Vehicle # JDN1024	
- FFB weighbridge ticket # 101750; Supplier: Jaya Sewajar Sdn. Bhd.; Field # 00; DO # JS3012; Net weight: 3,840 kg; Vehicle # JMP5572	
	 PK dispatch ticket # 103023; Customer: PGEO Oil Mill Sdn. Bhd.; DO # PK 123202006239; Net weight: 40,100 kg; Vehicle # JHH2621/7679 FFB incoming records also maintained for own and external FFB supplies as per sample as following: FFB weighbridge ticket # 101677; Supplier: Telok Sengat Estate; Field # PM97B; DO # TS97285; Net weight: 5,380 kg; Vehicle # JDN1024 FFB weighbridge ticket # 101765; Supplier: Guntung Division; Field # PM04A; DO # G04585; Net weight: 10,050 kg; Vehicle # JMX7794 FFB weighbridge ticket # 101534; Supplier: Chamek Estate; Field # 00C, 01C, 98B, PM01/PM01A; DO # 3942; Net weight: 30,090 kg; Vehicle # JMR6789 FFB weighbridge ticket # 101635; Supplier: Kulai Young Estate; Field # 13, PJ11, PM95; DO # 01586; Net weight: 17,750 kg; Vehicle # JMT6388 FFB weighbridge ticket # 101641; Supplier: Tanjong Buai Oil Palm; Field # 90; DO # 4009; Net weight: 1,880 kg; Vehicle # JDN1024 FFB weighbridge ticket # 101750; Supplier: Jaya Sewajar Sdn. Bhd.; Field # 00; DO # JS3012; Net weight: 3,840 kg; Vehicle



Criterio	on / Indicator	Assessment Findings	Compliance
Criterio	n 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 -	Mill operations are in compliance with the applicable local, state, national and ratified international laws and regulations. Legal Requirement Register (LRR) Document No. SMP-GPB-22 (rev 06) was available for verification.	Comply
4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirement register. - Major compliance -	LORR was established to cover all legal acts, regulations and other requirement related to POM and supply base. The sample of Act and Legal: 1. Minimum Wages Order 2020 2. OSHA 1994 3. FMA 1967 4. Uniform Building By Law 1984 5. Electrical Supply (Amendment) Act 2015 6. Fire Services Act 7. Environmental Quality Act 8. Local Government Act	Comply
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	LORR was established to cover all legal acts, regulations and other requirement related to POM and supply base. The sample of Act and Legal.	Comply



Criterio	on / 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 -	Tracking system available to identify changes in the relevant regulations through head office, sustainability team, website information and the information are communicated from the Head Office (Sustainability Section). Boustead Plantations Berhad have centralised system for tracking any changes in the law and subscribe into Lawnet. The latest updated was done on 15/7/2019.	Comply
Criterio	n 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 -	Telok Sengat POM situated within Telok Sengat Estate land area. Estates within Boustead Telok Sengat Business Unit holds copies of each of the management documents that are required to be publicly available. Copies of the document such as documents related to the land title was kept by Telok Sengat Estate for mill's area.	Comply
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 -	Telok Sengat POM situated within Telok Sengat Estate land area. Estates within Boustead Telok Sengat Business Unit holds copies of each of the management documents that are required to be publicly available. Copies of the document such as documents related to the land title was kept by Telok Sengat Estate for mill's area.	Comply
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	Mill boundary was clearly demarcated and maintained using fencing.	Comply
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	There is no land dispute in the Telok Sengat Business Unit at the time of audit. The lands are leased from CIMB Trustee Berhad via	Comply



Criterio	on / Indicator	Assessment Findings	Compliance
	available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	verified with the land titles. There was no encroachment of land by the Telok Sengat Business Unit.	
Criterio	n 4.3.3 – Customary rights		
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	The estate lands are legally owned and leased by the company. The existing estates are not encumbered by any customary land rights. The company has constructed trenches, wooden pegs and painted the palms to differentiate the land boundaries. No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit.	Comply
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	The estate lands are legally owned and leased by the company. The existing estates are not encumbered by any customary land rights. The company has constructed trenches, wooden pegs and painted the palms to differentiate the land boundaries. No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit.	Comply
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	The estate lands are legally owned and leased by the company. The existing estates are not encumbered by any customary land rights. The company has constructed trenches, wooden pegs and painted the palms to differentiate the land boundaries. No issues related to loss of legal customary rights with indigenous peoples, local	Comply



Criterio	on / Indicator	Assessment Findings	Compliance
		communities and other stakeholders reported during the time of audit.	
4.4 Prin	ciple 4: Social responsibility, health, safety and employr	nent condition	
Criterio	n 4.4.1: Social Impact Assessment (SIA)		
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	Social impact identified through Social Impact Assessment conducted by Malaysian Environmental Consultants Sdn. Bhd. as per report dated 29/6/2018. Assessment was conducted on 2-10/4/2018 with stakeholder consultations conducted on 21-22/5/2018.	Comply
Criterio	n 4.4.2: Complaints and grievances		
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	Telok Sengat POM has developed Flowchart of Complaint/ Suggestion (Grievance Procedure) to receive the complaints from internal and external stakeholders. The flowchart has clearly stated the Social Officer will be receiving the complaints. Besides, the company has developed Whistleblowing Policy dated 11/1/2011 signed by Senior General Manager.	Comply
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - Major compliance -	Complaint/ Suggestion Form was established and implemented in the mill to record any complaints from the stakeholders. Besides, Complaint Form for Housing Repair also implemented in the mill. The mill management has taken action to rectify the complaints and updated the actions taken in the form and Complaint Report	Comply



Criterio	on / Indicator	Assessment Findings	Compliance
		Book. The complainant has acknowledged on the complaint form after the issue has been resolved by the management.	
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - Minor compliance -	Complaint/ Suggestion Form was implemented, and the empty form was available in the AP Post and Secretary of the Complaint Committee in Telok Sengat POM. Interviewed with the stakeholders confirmed that they are understood about the complaint procedure.	Comply
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.	Consultation with the stakeholders confirmed that they are understood about the complaint procedure.	Comply
	- Minor compliance -		
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.	Complaints and resolutions records were documented and made available to affected stakeholders upon request since August 2018.	Comply
	- Major compliance -		
Criterio	1 4.4.3: Commitment to contribute to local sustainable developr	nent	
4.4.3.1	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.	The mill management has allocated RM 63/ month allowance for the workers' children who are studying secondary school. Besides, the management has provided the opportunity for the university students to have the field trip to the mill and explained to the students on the mill process. The mill management has organized	Comply
	- Minor compliance -	activities with the workers such as family day, Indian temple	



Criterio	on / Indicator	Assessment Findings	Compliance
		prayers, health check and bowling competition. All the activities organized was sighted with the photo evident.	
Criterio	n 4.4.4: Employees safety and health		
4.4.4.1	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented. - Major compliance -	The OSH programme dated 4 Jan 2020 cover for OSH meeting, Training, WPI, HIRARC and others. Policy already been communicated with workers and staff during OSH meeting and morning briefing. OSH Manual refer to OSH/001/2015 dated 7 Dec 2015. Interview with staff and workers revealed that all working SOPs being consistently implemented among all employees and monitored by the management through daily muster briefing, training and etc.	Comply
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: i. All employees involved are adequately trained on safe working practices; ii. All precautions attached to products should be properly observed and applied; 	 The plan of Safety and health was available dated Jan 2020. a) The Safety and health policy were available dated 2 Dec 2019 already been communicated to employee dated 3 March 2020 as per training record. b) HIRARC – OSH /HIRARC/1 dated 11 Feb 2020 & CHRA by Safety Solution PLT (HQ/04/ASS/00/203-2018/007). As per sampling recommendation from CHRA assessor to conduct chemical exposure monitoring for Potassium Chromate and N-Hexane by Hygiene Tech 1 in Laboratory. The record of Chemical exposure was available dated6 August 2019 by PAC Testing & Consulting Sdn Bhd (JKKP KIM 127/453/8/ (3)) 	Comply



Criterion / Indicator	Assessment Findings	Compliance
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) for workers' safety and health. The appointed 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 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.	c) The Awareness and training programme which includes the following requirements for employees exposed to chemical and hazard was available under Training needs and plan record dated Jan 2020. Detail training been conducted can referred under indicator 4.4.6.2 d) PPE issuance record was available under store management. For Lab local exhaust ventilation monitoring was available as per report ref: HQ/18/JHII/00/00019-2019/003 dated 4 April 2019 from CIH Laboratory Snd Bhd. e) The SOP available under title Health, Safety & Environmental (HSE) Manual dated 1 July 2013. This manual includes 15 area from activity reception & dispatch until Mill store. f) The management already appoint manager as person responsible regarding to safety and health as per letter Ref: OSH/02/AM/Hashini dated 17 Feb 2017. g) The management have conducted regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such OSH meeting dated 13 Feb 2020 and previously done on 9 Oct 2019. h) Accident and emergency procedures was available, and instructions was be clearly understood by all employees during training. The record can refer under training indicator i) Employees trained in First Aid was available at all mill operations. First Aid equipment also available at each worksite. Latest training on 2 May 2018 and valid for 3 years.	



Criterio	on / Indicator	Assessment Findings	Compliance
	- Major compliance -	 j) The record of accident was available in mill, from the previous year the 2 record of JKKP 7 on hearing impairment and kept record accordingly. 	
Criterio	n 4.4.5: Employment conditions		
4.4.5.1	The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees. - Major compliance -	Boustead Plantations Berhad has developed Human Rights Policy dated 11/1/2016 signed by Senior General Manager. The company is committed to ensure every individual are treated with fairness, dignity and respect. The company will respect the rights of every individual. They also recognize their responsibilities to respect human rights and avoid complicity in human rights abuses. Latest training of the policy was conducted on 29/7/2019 in Telok Sengat POM. Seen the training attendance list and photo of the training. Besides, the policy was publicly displayed at the notice board outside the office.	Comply
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - Major compliance -	Boustead Plantations Berhad has established Equal Opportunities Policy dated 11/1/2011 signed by Senior General Manager. The company will ensure all the relevant parties will be treated equally and no discrimination based on race, caste, nationalities, religion, gender, age and etc. Interviewed with the workers from different nationalities, gender and age confirmed that no discrimination was occurred in the mill.	Comply
4.4.5.3	Management shall ensure that employees' pay, and conditions meet legal or industry minimum standards as per Collective Agreements.	There were employment contracts for staff and workers. Pay and conditions are documented and are above the Minimum Wage Order 2020. Sampled of employment contracts confirmed that	Comply



Criterio	n / Indicator	Assessment Findings	Compliance
	The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.	terms and conditions are clearly outlined and have been signed by the worker as per samples as following:	
	- Major compliance -	- Employee # 0668J; Date joined: 20/6/2015; Workstation: Hard Bunch	
		- Employee # 0700G; Date joined: 15/6/2016; Workstation: Loading Ramp	
		- Employee # 0755G; Date joined: 8/12/2018; Post Workstation: Capstan Line	
		- Employee # 0754J; Date joined: 1/11/2018; Workstation: Lab	
		- Employee # 0744G; Date joined: 16/5/2018; Workstation: General Gang	
		- Employee # 1065V; Date joined: 19/1/2017; Workstation: Weighbridge	
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.	There was contractor available in the mill for work such as grass cutting. The grass cutting was carried out by the contractor himself without employed any workers. Therefore, there was no issue on the wages of employees of contractors.	Comply
	- Minor compliance -		
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.	The mill management has maintained a profile of each worker together with the employment contract where personal details such as name, gender, date of birth, job description, date entry and wages were stated in the contract.	Comply



Criterio	n / Indicator	Assessment Findings	Compliance
	- 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. - Major compliance -	Employment contracts for checkroll workers were acknowledged and kept a copy by the workers verified through interviewed with the workers. The contract was in the language that understood by the workers. The terms and conditions were clearly stated in the contract such as salary, annual leaves and public holiday entitlement, rate of work on rest day and overtime. Sampled of	Comply
		employment contracts sighted as per indicator 4.4.5.3 above.	
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 mill management has implemented Punch Card system to record the working hours and overtimes carried out by the workers.	Comply
	- Major 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.	The working hours and break time were clearly stated in the employment contracts signed by the workers prior to work. The working hours for Shift 1 are from 8 a.m. to 4 p.m. and Shift 2 is from 4 p.m. to 12 a.m. The break time for lunch is 45 minutes and	Comply
	- Major compliance -	tea break are 15 minutes.	
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.	Documented payslip was distributed to individual workers on the day of payment. Wages and overtime were paid according to the Punch-Card Attendance records. Total hours of overtime and daily	Comply
	- Major compliance -	attendance were recorded in the checkroll book. Payslips sighted for sample workers as per indicator 4.4.5.3 above and it was confirmed that workers achieved the Minimum Wage Order 2020.	
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	The management provided free medical facilities to all the workers and dependents. Subsidized of water and electricity supply to all	Comply



Criterio	n / Indicator	Assessment Findings	Compliance
	work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings.	the workers. Besides, the company has constructed new housing to the staffs.	
	- Minor 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. During site visit to the linesite found that playground, football field, mosque and temple were available and free access to all the workers and dependents. Sundry shop was available at Telok		Comply
	- Major compliance -	Sengat Estate which is inside the living quarters for mill.	
4.4.5.12	4.4.5.12 The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. Boustead Plantations Berhad has developed a Sexual Policy signed by Senior General Manager, En. Shoib Ab 11/1/2011. The company will ensure the comfort and		Comply
	- Major compliance -	every employee, clients, business partners and public that involved in the plantations' activities. The policy has clearly stated the types of sexual harassment such as verbal, visual, psychology, physical etc. Gender committee for Telok Sengat Mill and Estate is combined with participation from both side; lead by the chairperson Pn. Zaliha Bt Ahmad and AJK – Pn Masitah Bte Said. Meeting minutes dated 17.01.2019 was held at Telok Sengat Estate, meeting minutes sighted. Topic discussed includes, election of the committee to be done biannually, proposal of activities, stray dogs, etc. Meeting was also held dated on 09.07.2019.	
4.4.5.13	The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective	Boustead Plantations Berhad has developed Freedom of Association Policy dated 11/11/2011 signed by Senior General Manager, En. Shoib Abdullah. The company is committed and allowed their stakeholders such as employees, clients, business partner etc. to form or join any association. Consultation with both the local and foreign workers confirmed that they are free to join NUPW. Sample	Comply



Criterio	n / Indicator	A	ssessment Finding	gs	Compliance
	bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.		4.06.2019 in Telok S	nittee meeting that was latest in Telok Sengat Estate, where eld.	
	- 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. - Major compliance -	and Age Limit Policy with the Children and ILO Convention 138 (years old will be recrui	dated 11/1/2011. The Young Persons (Empl 1973) Article 1-3. No ited and less than 18 y ied on the Employee	d Employment of Child e company will comply oyment) Act 1966 and workers less than 16 years old for hazardous Master List confirmed 8 years old.	Comply
Criterion	4.4.6: Training and competency				
4.4.6.1	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training. - Major compliance -			Comply	
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.	implemented. The programme includes training for all categories of		Comply	
	- Major compliance -	Date	Training	Remark	



Criterio	on / Indicator	A	Assessment Findin	gs	Compliance
		3 March 2020	Blower application training	Attended by workers and staff	
		19 Feb 2020	Safety working procedure at workplace	Attended by workers and staff	
		19 Feb 2020	Working safely at height	Attended by workers and staff	
		20 Jan 2020	MSPO & RSPO Training	Attended by all	
		17 Feb 2020	Ergonomics Training	Attended by all	
		2 May 2018	First Aider Training	Attended by First Aider	
4.4.6.3	A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure. - Minor compliance -	Criteria was establish categories of operator regards to individual found to be complied Training programme implemented. The pro	ned and implemented ors, including all field duties and training ne planned for year 2 ogramme includes train	of MSPO Principles and Training for various and office staff, with eds was reviewed and 019 was consistently ing for all categories of	Comply
		workers. Evidence of working practices pro	adequate and approp	oriate training on safe	



Criterion / Indicator		Assessment Findings	Compliance
		- workers working in confined space etc.	
4.5 Prin	ciple 5: Environment, natural resources, biodiversity and	d ecosystem services	
Criterio	n 4.5.1: Environmental Management Plan		
4.5.1.1	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented. - Major compliance -	The environmental impact assessment (EIA) was documented as Environmental Aspect & Impact Identification Form; File # BEA/5.1/EAI. Environmental impact assessment was made based on the procedure of Environmental Aspect/Impact Evaluation; Rev. 1; Issue date: Jan 2017. For mill, it was sighted that the aspect identified, and impact evaluated covered all mill operational stations activities including operation of vertical sterilizer, maintenance of crude oil pumps, sludge pumps, waste pumps, effluent treatment plant and etc. For estate, the assessment covered all field and facilities operational activities including operation of field upkeeps, machinery repair workshop, spraying and harvesting. Sample: - Area/Field: Workshop; Serial # EAI/2018/14-01; Activity: Welding; Aspect: Material Consumption; Environmental Load Item: Welding rods & Acetylene gas; Control: SW disposal of spent welding rod & reuse of gas cylinder	Comply
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives;b) The aspects and impacts analysis of all operations- Major compliance -	The environmental management plan covered in the established action plan of significant environmental aspects identified and impacts evaluated as per documents sighted as following: - Environmental Aspect and Impact Identification 2018; Serial # EAI/2018/001-1 to EAI/2018/013-1 dated 30/8/18	Comply



Criterio	n / Indicator	Assessment Findings	Compliance
		- Environmental Impact Evaluation Form Serial # EIE/2018/01-1 to EIE/2018/014-1 dated 30/8/18	
		The mill implemented the relevant management plan for their existing planting which covered all field and facilities operational activities including operation of operations, machinery repair, workshop, and others.	
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.	The developed environmental improvement plan to mitigate the negative impacts and to promote the positive ones were effectively implemented and monitored.	Comply
	- Major compliance -		
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan.	Few environmental plans were established (environmental management plan and waste management plan). The plan was as	Comply
	- Minor compliance -	follow:	
		- To ensure BOD below 100ppm at final discharge	
		- To upgrade from single pass opacity to double pass opacity	
		- Reduce GHG emission	
		 To capture and remove dust emissions – install ESP was in progress 	
		- To upgrade existing empty bunch hopper drainage system	
		- To monitor smoke emissions from boiler and diesel genset operation and emission from LEV	



Criterio	on / Indicator	Assessment Findings	Compliance
implemented to ensure that employees understand the policy, w		The recent specific biodiversity and environmental policy briefing was conducted on Feb 2020 which was attended by all estate staff and employees.	Comply
	- 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 -	The management already conduct the regular meeting EPMC with workers representative periodically. This meeting discus regarding to environmental quality such as Biology oxygen demand for POME, Scheduled waste management, dust particulate emission and others.	Comply
Criterio	1 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 to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period - Major compliance -	A plan for improving efficiency of the use of fossil fuels was established to include Mill and estate quarters, office, meeting room, weighbridge, laboratory and mill operation, fuel consumption at estate Diesel use per mt FFB was monitored every month. The Plan for Improving Fossil Fuel and Palm GHG FY 2019 includes the following:	Comply
	Plajor compilance	- To minimize and limit electrical usage	
		- Replace bulb with an energy saving bulb last 10 times longer	
		with 75% less energy	
		- Switch off or unplug any charges or appliances not in use	
		- To put in hibernate of sleep mode for all pc not in use	



Criterion / Indicator		Assessme	nt Findings	Compliance
		- conduct training give awareness		
			improving efficiency of the use of sel use. Diesel consumption/FFB	
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	el, and estimation was compared to the actual usage by monthly as s. This reported to the head office for monitoring.		Comply
	machinery operations.	Operating Unit	Diesel	
	- Major compliance -	Telok Sengat Mill	1.04	
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	There uses mesocarp fibers as its main source of energy as the steam boiler fuel. Steam turbine was fully in operation when the process runs.		Comply
Criterio	n 4.5.3: Waste management and disposal			
4.5.3.1	All waste products and sources of pollution shall be identified and documented.		f pollution was identified in Waste 2019 for the mill. Based on the	Comply
	- Major compliance -		ear 2019 the following wastes and	
		- Domestic waste: Rubbish fron	n linesite, office and etc.	
		- Industrial waste: POME, EFE empty container, used tyres 8	3, scrap metal, compost, reused tubes	
		- Scheduled waste: SW305, SW	7306, SW 409, SW410 & SW 102	



Criterio	on / Indicator	Assessment Findings	Compliance
4.5.3.2	A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for: a) Identifying and monitoring sources of waste and pollution. b) Improving the efficiency and recycling potential of mill byproducts by converting them into value-added products. - Major compliance -	As above, all waste products and sources of pollution was identified in Waste Management Action Plan Year 2019 for the mill. Site visit confirmed that the practice of reduce, reuse and recycle of materials was implemented. Segregation of wastes i.e. general wastes and scheduled wastes were verified to be satisfactory. Proper storage areas were identified for the storage of the recyclable waste.	Comply
4.5.3.3	- Major compliance -	The first time storage of the feet aluste waster	
4.5.3.3	The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005	implemented accordingly. Records sighted for SW i.e. Identification implemented accordingly. Records sighted for SW i.e. Identification in the sign of	
	- Major compliance -		
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.	The domestic waste for mill was handle by Telok Sengat Estate.	Comply
	- Minor compliance -		
Criterio	n 4.5.4: Reduction of pollution and emission		
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.	Based on the assessment done by the mill of all polluting activities as of the Environment Aspect and Impact assessment, identified sources were boiler chimney, POME treatment & diesel as the main GHG pollutants. Current monitoring for emissions was through	Comply



Criterio	on / Indicator	Assessment Findings	Compliance
	- Major compliance -	online boiler smoke density and alarm and quarterly boiler stack monitoring of dust particulate. Other environmental assessment carried out as per Action Plan for Environmental Assessment 2018 established.	
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	Significant pollutants identified were SW generated, POME discharge and boiler stack emissions. These pollutants impact to GHG were monitored as per established plan. All action already been implemented and verified during site visit and document review.	Comply
4.5.4.3	Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations. - Major compliance -	Monitoring of POME discharge conducted on monthly basis through sample analysis by external lab and establish in Online Environmental Report Quarterly report to Department of Environmental (DOE) accordingly. As per verification all record the result show below 100 ppm and comply with latest Jadual Pematuhan requirement.	Comply
Criterio	n 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 into the natural waterways at a frequency that reflects the mill's current activities.	Protection of water courses and wetlands implemented as per established policy of slope and river buffer protection policy (Refer Polisi Zon Perlindungan Cerun dan Zon Penampan Sungai); dated 12/1/2015. Protection program includes monitoring of river water quality as per sample Certificate of Analysis; Cert. # 20191114-06-0; Sample date: Nov 2019; Sample mark: A. Upstream; B. Downstream; C. Final discharge (POME). All results found within the limit as per DOE compliance schedule.	Comply



Criterio	on / Indicator	Assessment Findings	Compliance
	 c) Ways to optimize water and nutrient usage and reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). - Major compliance - 		
4.5.5.2	Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations. - Major compliance -	No open discharge of POME into water course was practiced. This was based on the field visit which found piping installation of sprinkler applications which were verified with the documents and site verification.	
4.6 Prin	ciple 6: Best Practices		
Criterio	n 4.6.1: Mill Management		
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	Quality Assurance Manual (QAM, Rev:01, Date:2/11/09), Mill operation Manual (MOM, Issue 2, Date: June 2002) and Standard Operating Procedure for SPOM was established to cover all the station. Sighted some of the procedure related to loading ramp, sterilization station, threshing and press station, clarification station, kernel station, depericarper station, kernel station, effluent treatment plant, boiler house, power house, water treatment plant etc.	Comply
4.6.1.2	All palm oil mills shall implement best practices. - Major compliance -	The implementation in the TSPOM was consistent with the Quality Assurance Manual and Work Instruction. Sighted Internal Audit report which was conducted once a year by Sustainability section, the 1st internal audit was conducted on Oct 2019 to cover the entire	Comply



Criterion / Indicator		Assessment Findings	Compliance
		criterion stated in the standard and SOP. The other was reported by Visited Engineer.	
Criterio	n 4.6.2: Economic and financial viability plan		
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	TSPOM and supply base was established and implemented its commitment to long term sustainability and improvements through a capital expenditure programme e.g.: Capital expenditures, vehicle and heavy plant running schedule, OER, KER etc. Budget 2019- and 5-years planning horizon (projections 2019- 2023) was verified during the audit.	Comply
		Telok Sengat POM was made progress towards achieving their performance production targets for the current financial year.	
Criterio	n 4.6.3: Transparent and fair price dealing		
 4.6.3.1 Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance - 		Pricing mechanism for mill mainly for FFB purchased from external supplier. Price of current FFB price is prominently displayed at the mill outside the weighbridge counter and updated on monthly basis. Sighted the price as of 27.08.2019 is RM17.81. Price of past FFB price can be obtained through 'Monthly FFB Purchase" file, based on "Telok Sengat Palm Oil Mill Own Estate – Boustead Estates Agency Sdn Bhd (Marketing Department)" letter issued by Marketing department on monthly basis. Calculation of FFB price is based on 'Kadar Perahan 1% (MPOB)' guideline. Each of the grower will be updated on the new price and issued with "Computation of Payment for FFB Purchased" for reference and cross –checking.	Comply



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 -		 Contracts are fair, legal and transparent as per sample sighted as following: Company No.: 440251P (Jaya Sewajar Sdn Bhd), dated 1995 valid up to date. (Contract valid based on clause 12 - unless terminated by either party with 2 months' notice in advance) Company No.: 581864 U (Asia Elmark Sdn Bhd), dated 20.11.2018, remains valid as at time of audit. Contract Ref: BEA/OCP/XI/2018 Company No.: 21873-W (Yew Tan Enterprise), dated 12.10.2011 remain valid as at time of audit (Contract valid based on clause 6 – Term; unless terminated by either party with 2 months' notice in advance) Company No.: 612175-V (Sing Rubber & Transport Sdn Bhd), dated 26.08.2019, contract remain valid as at time of audit. Consultation with stakeholders among mill vendors and contractors confirmed that agreed payments were made in timely manner by the mill. 	
Criterion	1 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 -	Sampled contract agreements (as per indicator 4.6.3.2 above) were included with a special clause on MSPO compliance required for the contractor upon award.	Comply



Criterion / Indicator		Assessment Findings	Compliance
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	The contractors have signed on the contract agreement prior to provide services. Seen the contract agreement and details as refer to Criterion 4.6.3.2.	Comply
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	Boustead Plantations Berhad has agreed for BSI auditors to verify the assessment through a physical inspection if required.	Comply



Appendix B: List of Stakeholders Contacted

Government Officer:	Community/neighbouring village:		
SK Telok Sengat	Village Head, Kampung Johor Lama		
Sekolah Agama Telok Sengat	Village Head, Kampung Chamek		
SJK(C) Telok Sengat			
SJK(T) Telok Sengat			
Suppliers/Contractors/Vendors:	Worker's Representative/Gender Committee:		
Mill suppliers & contractors	Workers Representative		
Estate suppliers & contractors	Gender Representative		
	Harvesters		
	Sprayers		
	Mill Operators		



Appendix C: Smallholder Member Details

No.		Smallholder		GPS	Certified	Planted
	Name	MPOB License Number	Planted Area (District)	U. U	Area (ha)	
1	Nil	n/a	n/a	n/a	n/a	n/a



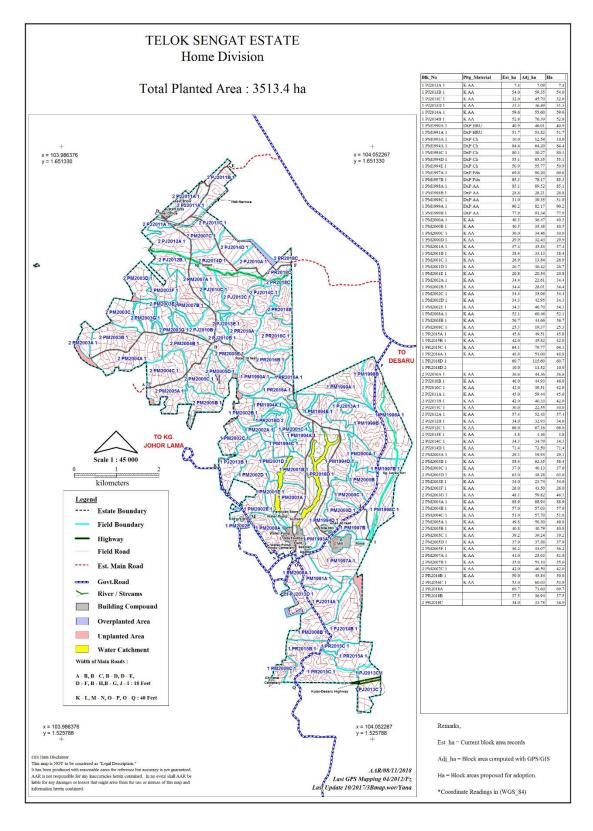
Appendix D Location and Field Map

Telok Sengat Palm Oil Mill Location



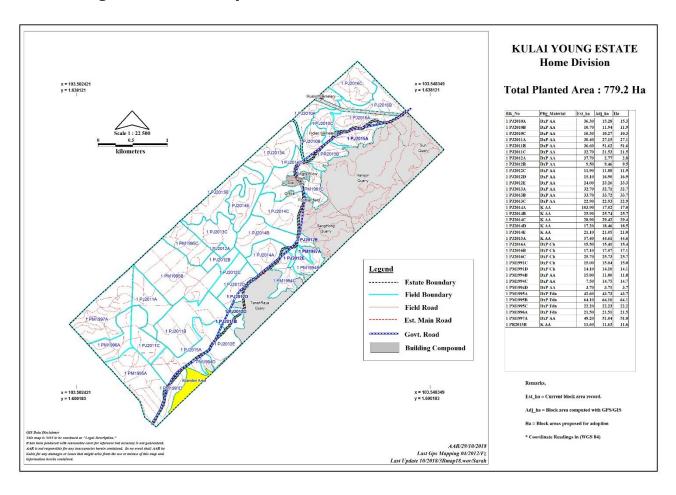


Telok Sengat Estate Field Map



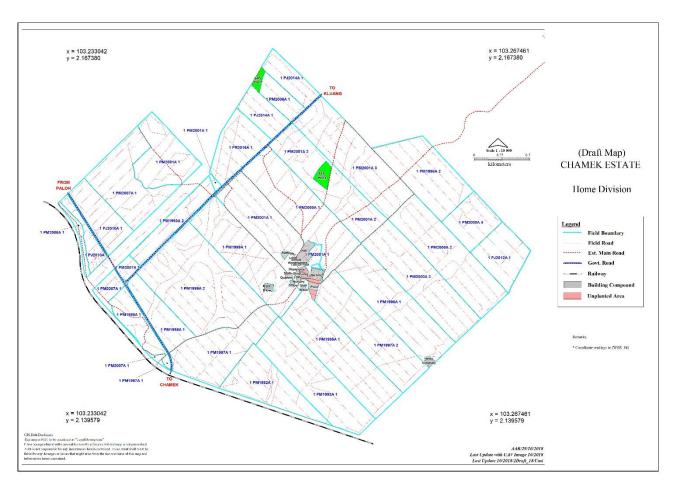


Kulai Young Estate Field Map





Chamek Estate Field Map





Appendix E: List of Abbreviations

BOD Biochemical Oxygen Demand

CB Certification Bodies
CE Chamek Estate

CHRA Chemical Health Risk Assessment COD Chemical Oxygen Demand

CPO Crude Palm Oil
EFB Empty Fruit Bunch

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

FFB Fresh Fruit Bunch

FPIC Free, Prior, Informed and Consent

GAP Good Agricultural Practice

GHG Greenhouse Gas

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

ISCC International Sustainable Carbon Certification

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

MT Metric Tonnes
OER Oil Extraction Rate

OSH Occupational Safety and Health

PK Palm Kernel
PKO Palm Kernel Oil
POM Palm Oil Mill

POME Palm Oil Mill Effluent

PPE Personal Protective Equipment

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

SIA Social Impact Assessment SOP Standard Operating Procedure

TSE Telok Sengat Estate
TSPOM Telok Sengat Palm Oil Mill