

**MALAYSIAN SUSTAINABLE PALM OIL
MSPO OPMC Public Summary Report**

- Initial Assessment
- Annual Surveillance Assessment (Choose an item.)
- Recertification Assessment (RA 1)
- Extension of Scope

BOUSTEAD PLANTATIONS BERHAD
Client Company (HQ) Address: 10 th , 11 th , and 18 th Floor, Menara Boustead 69, Jalan Raja Chulan 50200 Kuala Lumpur, Malaysia
Certification Unit: Boustead Emastulin Sdn. Bhd. - Segaria Business Unit Segaria Palm Oil Mill and Segaria Estate
Date of Final Report: 2/6/2023

Report prepared by:
Mohd Nur Amin Bin Mohd Halim (Lead Auditor)

Report Number: 3852047

Assessment Conducted by:
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Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
Company Name	Boustead Emastulin Sdn. Bhd. - Segaria Business Unit		
Mill/Estate	Certification Unit	MPOB License No.	Expiry Date
	Segaria Palm Oil Mill	508110904000	31/05/2024
	Segaria Estate	504677002000	31/03/2024
Address	Head Office: 10 th , 11 th , and 18 th Floor, Menara Boustead, 69, Jalan Raja Chulan, 50200 Kuala Lumpur, Malaysia		
Management Representative	Pn. Azmariah Muhamed/ Cik Mitah Limpu		
Website	www.bousteadplantations.com.my	E-mail	azmariah@bplant.com.my
			mitah@bplant.com.my
Telephone	03-2145 2121	Facsimile	03-2144 7917

1.2 Certification Information			
Certificate Number	Mill: MSPO 682292 Estate: MSPO 682293	Certificate Start Date	22/03/2023
Date of First Certification	22/03/2018	Certificate Expiry Date	21/03/2028
Scope of Certification	<input checked="" type="checkbox"/> Mill: Production of Sustainable Palm Oil and Palm Oil Products <input checked="" type="checkbox"/> Estate: Production of Sustainable Oil Palm Fruits		
Visit Objectives	<p>The objective of the assessment is to conduct a reassessment and look for positive evidence to ensure the elements of the scope of certification and the requirements of the management standard are effectively addressed by the Boustead Plantations Berhad's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the Boustead Plantations Berhad specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan.</p>		
Standard	<input type="checkbox"/> MSPO MS 2530-2:2013 – General Principles for Independent Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills		
Recertification Assessment Visit Date (RAV) 1	20/02/2023 - 23/02/2023		
Continuous Assessment Visit Date (CAV) 1_1	-		
Continuous Assessment Visit Date (CAV) 1_2	-		
Continuous Assessment Visit Date (CAV) 1_3	-		
Continuous Assessment Visit Date (CAV) 1_4	-		

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1.3 Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 682292	RSPO Principles & Criteria of Sustainable Palm Oil production: 2018; Malaysian National Interpretation: 2019	BSI Services Malaysia Sdn. Bhd.	06/03/2028
QMS 00454	ISO 9001:2015	SIRIM QAS International Sdn. Bhd.	20/07/2024

1.4 Location of Certification Unit			
Name of the Certification Unit (Palm Oil Mill/ Estate)	Site Address	GPS Reference of the site office	
		Latitude	Longitude
Segaria Palm Oil Mill	P.O. Box 132, 91308 Semporna, Sabah, Malaysia	4° 29' 54.3" N	118° 24' 03.8" E
Segaria Estate	P.O. Box 132, 91308 Semporna, Sabah, Malaysia	4° 29' 54.30" N	118° 24' 03.8" E

1.5 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Segaria Estate	4,465.10	197.97	83.40	4,764.20	94.08
Total (ha)	4,465.10	197.97	83.40	4,764.20	

Note:
The changes in of Infrastructure in area of statement are due to management conduct re-survey for the whole area at all estates.

1.6 Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Segaria Estate	691.70	458.00	2,133.80	1,059.00	122.60	3,773.40	691.70
Total (ha)	691.70	458.00	2,133.80	1,059.00	122.60	3,773.40	691.70

1.7 Certified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Mar 2022 - Feb 2023)	Actual (Jan 2022 - Jan 2023)	Forecast (Mar 2023 - Jan 2024)
Segaria Estate	78,000.00	73,719.24	77,000.00

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Total (mt)	78,000.00	73,719.24	77,000.00
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1.8 Uncertified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Mar 2022 - Feb 2023)	Actual (Jan 2022 - Jan 2023)	Forecast (Mar 2023 - Jan 2024)
N/A	N/A	N/A	N/A
Total (mt)	N/A	N/A	N/A

1.9 Certified Tonnage			
Mill Capacity: 30 MT/hr SCC Model: SG	Estimated (Mar 2022 - Feb 2023)	Actual (Jan 2022 - Jan 2023)	Forecast (Mar 2023 - Jan 2024)
	FFB	FFB	FFB
	78,000.00	73,719.24	77,000.00
	CPO (OER: 22.56%)	CPO (OER: 22.80%)	CPO (OER: 23.00%)
	17,550.00	16,807.99	17,710.00
	PK (KER: 3.50%)	PK (KER: 3.51%)	PK (KER: 3.50%)
	2,730.00	2,587.55	2,268.00

1.10 Actual Sold Volume (CPO)					
CPO (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
16,807.99	0.00	0.00	16,807.99	0.00	16,807.99

1.11 Actual Sold Volume (PK)					
PK (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
2,587.55	0.00	0.00	2,587.55	0.00	2,587.55

Section 2: Assessment Process

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI 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 20/02/2023-23/02/2023. The audit programme is included as Section 2.4. The approach to the audit was to treat the Segaria Palm Oil Mill and Segaria Estate as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities. The public notification has been published on 22/12/2022 via website as following: [01-03-mspo-public-notification recertification boustead-plantations-segaria-palm-oil-mill--supply-base english.pdf](#)

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 Certification Unit not using MSPO certification marks for any type of on- and off-product communication. The Certification Unit are compliance with the use of the MSPO Logo and related claims.

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

Emails also sent to selected stakeholders among NGOs, local authorities and interested parties on 14/02/2023. No feedbacks or comments received from the global stakeholder consultation and email consultation except for on-site consultation as reported under section 3.5 of this report. 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 Section 3.6.

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.

One of the previous nonconformities is re-occurred while the others are closed. The assessment findings from the initial assessment are detailed in Section 4.2. Major NC closure was conducted offsite based on evidence submitted.

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This report was externally reviewed by MSPO approved Peer Reviewer prior to certification and recertification decision by BSI. For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

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

Assessment Program					
Name (Mill / Plantation)	Year 1 (Recertification)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
Segaria Palm Oil Mill	✓	✓	✓	✓	✓
Segaria Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: February 19, 2024 - February 23, 2024

Total No. of Mandays: 7

2.1 BSI Assessment Team

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Mohd Nur Amin Bin Mohd Halim (MNA)	Team Leader	<p>Education: Diploma Office Management & Technology, UiTM.</p> <p>Work Experience: He gained his career as sustainability practitioner in Government Link Company related to palm oil plantation for over 6 years and 10 months majorly handling operational excellent, environment, safety and health at the upstream and downstream operations. He then joining an international certification body over the last 3 years and started his auditing career as qualified lead auditor for MSPO (OPMC and SCCS) scheme; and qualified auditor for ISCC Waste and Residue scheme. Concurrent, he was also a document controller and scheme coordinator for MSPO (OPMC and SCCS) prior to DSM accreditation.</p> <p>Training attended: He has completed Exemplar IMS (9001, 14001 & 45001) LA Course (2019), SA 8000 Course (2019), Endorse MSPO SCCS Course (2020), Endorse MSPO LA Course (2020), Endorse ISCC Waste and Residue Course (2020), HCV & HCS Course (2020), Endorse ISCC Basic & PLUS Course (2022), CQI & IRCA ISO 14001:2015 LA Course (2022), Endorse RSPO P&C LA Course (2022), Endorse RSPO SCCS LA Course (2022).</p> <p>Aspect covered in this audit:</p>

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		<p>Interview with smallholders and stakeholders, Company policy & commitment, Internal Audit, Management Review, Continuous Improvement Plan, Transparency & communications, Traceability, Legal requirement, land used rights, social aspect & aspects, human rights, employees' welfare, trafficking & child labour, stakeholders' consultation, mill best practices, mill economic viability and mill contractor management. (Principle 1, Principle 2, Principle 3, Principle 4, Principle 6).</p> <p>Language proficiency: He is fluent in both verbal/ written English and Bahasa Malaysia languages.</p>
Amir Bin Bahari (AB)	Team Member	<p>Education: Bachelor Of Science (Hons) Chemistry, from Universiti Sains Malaysia (USM) in 1985 and Diploma in Palm Oil Milling Technology/Management in 1996 from MPOB, a registered Chemist with Institut Kimia Malaysia as AMIC.</p> <p>Work Experience: 34 years' experience in the oil palm industry including in the mill and estates, 350 mandays in RSPO auditing, and 210 mandays in MSPO audit.</p> <p>Training attended: Attended RSPO Lead Assessor Course (Refresher) on May 2022 and MSPO Lead Auditor course in April 2016, as well as courses related to HCV & GHG, social and environmental related program.</p> <p>Aspect covered in this audit: Interview with workers, safety requirement, safety risk analysis, safety implementation, accident reporting, environmental management & action plan, environmental requirement, biodiversity & HCV, water & waste management, opening burning practices, training, estate best practices, Estate economic viability and estate contractor and new development. (Principle 4, Principle 5 Principle 6 and Principle 7).</p> <p>Language proficiency: He is fluent in both verbal/ written English and Bahasa Malaysia languages.</p>
Mohd Sabre Salim (MSS)	Peer Reviewer	<p>Education: Master's in Business Administration (MBA) from UiTM in 2006 and Bachelor Science Agribusiness from UPM in 1986.</p> <p>Work Experience: He gained his working exposure in the plantation sector, serving as an Plantation Manager with Hap Seng Plantation Berhad and currently as consultant, free-lance lecturer, and trainer at MDV Management Sdn Bhd. He has more than 50 MSPO report that has been reviewed.</p> <p>Training attended: He has completed Endorsed Lead Auditor Course and Endorsed MSPO Lead Auditor Course and MSPO Peer Review certificate by MPOCC. He has attended MSPO Peer Reviewer 1 - 2017 by MPOCC.</p> <p>Expertise:</p>

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		General management, leadership & financial management, occupational safety & health management, plantation (agriculture & agribusiness) management, Malaysian Sustainable Palm Oil (MSPO).
Muhammad Sufyan Azmi (MSA)	Peer Reviewer	<p>Education: Master’s in Business Administration (MBA) from Open University Of Malaysia and Bachelor Degree in Bioindustry from UPM in 2006.</p> <p>Work Experience: He gained his working exposure in the plantation sector with 15 years’ experience, currently serving as a Plantation Manager with TSH Resources Berhad and previously as an Audit Executive with Kulim Malaysia Berhad.</p> <p>Training attended: He has attended MSPO Peer Reviewer 2 - 2017 by MPOCC.</p> <p>Expertise: General management, auditing, environment and plantation management.</p>

2.2 Impartiality and conflict of interest

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

2.3 Accompanying Persons

No.	Name	Role
	N/A	

2.4 Assessment Plan

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

Date	Time	Subjects	MNA	AB
Sunday 19/02/2023	09:00 - 18:00	Audit team travel from Kuala Lumpur to Semporna, Sabah	✓	✓
Monday 20/02/2023	07:30	Travel to Segaria Estate (for Opening Meeting)	✓	✓
	08:30 - 09:00	Opening Meeting <ul style="list-style-type: none"> • Presentation by Boustead Group’s management • Presentation by BSI Lead Auditor – introduction of team member and assessment agenda • Confirmation of assessment scope and finalizing audit scope 	✓	✓

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Date	Time	Subjects	MNA	AB
	09:00	Travel to Segaria POM	✓	✓
	09:20 - 12:30	Segaria POM Site 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.	✓	✓
	12:30 - 13:30	Lunch break	✓	✓
	13:30 - 16:30	Segaria POM Document review P1 – P6 (MS 2530 Part 4): SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓
Tuesday 21/02/2023	07:30	Travel to Segaria POM	✓	✓
	08:30 - 11:30	Segaria POM Continue document review P1 – P6 (MS 2530 Part 4): General documentation.	✓	✓
	11:30 - 12:30	Interim closing meeting	✓	✓
	12:30 12:50 - 17:00	Travel to Segaria Estate (with Lunch Break) Segaria Estate Document review P1 – P7 (MS 2530 Part 3): General documentation e.g., Legal, Manual and Procedures, production and monitoring records, IPM & HCV records, SEIA documents and records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	✓ ✓	✓ ✓
Wednesday 22/02/2023	07:30	Travel to Segaria Estate	✓	✓
	10:00 - 12:30	Stakeholder Consultation Meeting Lead Auditor session with external stakeholders	✓	✓
	08:30 - 12:30	Segaria Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant, etc.), agrochemical mixing area, wastes management, workers housing, clinic, landfill, etc.	✓	✓
	12:30 - 13:30	Lunch Break	✓	✓
	13:30 - 17:00	Segaria Estate	✓	✓

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Date	Time	Subjects	MNA	AB
		Continue document review P1 – P7 (MS 2530 Part 3) general documentation.		
Thursday 23/02/2023	07:30	Travel to Segaria Estate	✓	✓
	08:30 - 10:30	Segaria Estate Continue document review P1 – P7 (MS 2530 Part 3) general documentation.	✓	✓
	10:30 - 11:00	Interim closing meeting with Segaria Estate	✓	✓
	11:00 - 11:30	Assessment team discussion and preparation	✓	✓
	11:30	Travel to Segaria POM	✓	✓
	11:50 - 13:00	Closing meeting at Segaria POM		
	13:00	End of Assessment	✓	✓
	13:00 - 17:00	Audit team travel to Tawau	✓	✓
Friday 24/02/2023	08:00 - 17:00	Audit team travel back to Kuala Lumpur	✓	✓

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
- MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills

3.2 Details of Nonconformities and Opportunity for improvement

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

During the assessment there were two (2) Majors & zero (0) minor nonconformities; and two (2) OFIs raised. The Segaria Palm Oil Mill and Segaria Estate Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the Corrective Actions for the Major Non-conformities has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-Conformity Report			
NCR Ref #:	2313686-202302-M1	Issue Date:	23/02/2023
Due Date:	22/05/2023	Date of Closure:	24/05/2023
Area/Process:	Segaria Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.1.3.1 Major
Requirements:	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.		
Statement of Nonconformity:	The changes in the HCV ha (a major changes in the ha statement) were not discussed in the Management Review meeting.		
Objective Evidence:	Minutes of Management Review Meeting on the following dates reviewed not included agenda of HCV hectare changes. 1. Minutes of meeting dated 18/11/2021 (attended 14 participants) 2. Minutes of meeting dated 15/01/2022 (attended 17 participants)		
Corrections:	Conduct a meeting to discuss the changes in the hectare statement and appoint a secretary to take minutes of the meeting.		
Root cause analysis:	1. No mill staff were trained in the MSPO Standard requirement i.e., things to be discussed in the management review meeting pertaining to MSPO. 2. Agenda of the meeting does not include the change of HCV hectare.		

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Corrective Actions:	<ol style="list-style-type: none"> 1. Request training in the MSPO Standard requirement from the Sustainability and Safety Department (Headquarter Office). 2. Include "Changes in HCV Hectarage" in the management review meeting agenda so that it will be discussed in the Management Review Meeting.
Assessment Conclusion:	<p>Segaria Estate submitted the evidence for NC Major with documents includes correction as below.</p> <ol style="list-style-type: none"> 1. Training plan for Year 2023 established by Segaria Estate management which includes MSPO Requirements scheduled in June and December 2023. 2. Management review meeting with document name as 'Minit Mesyuarat Pengurusan Kali Pertama 2023'. The meeting was conducted on 15/04/2023 and attended by 19 participants includes with manager, assistant managers and field staffs at Meeting Room, Main Division, Segaria Estate Office. Review on the agenda meeting, Segaria Estate management includes 4.0 'Kelestarian, Keselamatan & Kesihatan' which Identified topic of discussion 'Penambahan dan pengurangan Kawasan HCV di Ladang Segaria'. <p>The evidence submitted were found adequate and effectively implemented. The Major NC was closed on 19/05/2023.</p> <p>The implementation of the corrective actions will be verified during next assessment.</p>

Non-Conformity Report			
NCR Ref #:	2313686-202302-M2	Issue Date:	23/02/2023
Due Date:	22/05/2023	Date of Closure:	24/05/2023
Area/Process:	Segaria Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.4.5.3 Major
Requirements:	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.		
Statement of Nonconformity:	Salary payment for field workers is not according to Minimum Wages Order 2022.		
Objective Evidence:	<p>Based on sample of payslip from different types of works, gender and origin countries in Segaria Estate, it has been found that salary payment is not according to Minimum Wages Order 2022 which is RM57.69/day.</p> <ol style="list-style-type: none"> 1. 2738, Basic Wages 465.11, Work: 24 days, Ave Wage: MYR27.36. 2. 1427, Basic Wages: 993.00, Work: 25 days, Ave Wage: MYR39.72. 3. 1649, Basic Wages: 431.86, Work: 24 days, Ave Wage: MYR25.40. 4. 1785, Basic Wages 985.64, Work: 23 days, Ave Wage: MYR42.85. 		
Corrections:	Management to conduct motion study for all types of work, biannually basis, to identify the average productivity for respective types of work to ensure rate offered comply with daily minimum wage i.e., RM57.69/day.		
Root cause analysis:	The sampled workers frequently did not complete their 8-hour shift, hence, caused the low productivity and their salary did not achieve minimum wage i.e., RM57.69/day.		

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Corrective Actions:	<ol style="list-style-type: none"> 1. Close monitoring of workers' working hours by establishing working hours record. 2. Taking disciplinary action to workers who were not completing 8-hours of work by verbal and written warning.
Assessment Conclusion:	<p>Segaria Estate submitted the evidence for NC Major with documents includes correction as below.</p> <ol style="list-style-type: none"> 1. 'Kehadiran Pekerja' form submitted for April 2023 includes the emphasized of working hours monitoring for sprayer available to review. Based on the form, management able to demonstrate entry hours and exit hours of each sprayer to track the completing the task and to meet eight (8) hours attendance. 2. Sampled of 'Surat Amaran Bertulis' dated 01/02/2023 issued to workers as disciplinary action taken against workers who were not completing eight (8) hours of work. 3. Payment Voucher dated on 13/04/2023 for makeup wages to workers (For ID#2738, ID#1427, ID#1649 and ID#1785) available to review and sighted. Photo of cash payment for the makeup wages submitted and review. <p>The evidence submitted were found adequate and effectively implemented. The Major NC was closed on 19/05/2023.</p> <p>The implementation of the corrective actions will be verified during next assessment.</p>

Opportunity For Improvement			
Ref:	2313686-202302-I1	Clause:	MSPO 2530 Part 3: 4.3.1.1
Area/Process:	Segaria Estate		
Objective Evidence:	Management may further improve to clarify with NRA assessor on the grass cutter requirement to under the annual audiometry test due discrepancy in the NRA report page 23 (item on others) and page 24 (item 8.3 - audiometric testing program).		

Opportunity For Improvement			
Ref:	2313686-202302-I2	Clause:	MSPO 2530 Part 3: 4.2.2.3
Area/Process:	Segaria Estate		
Objective Evidence:	<p>Onsite interview with CLC teachers informed they are required assistance from Boustead's management to look into education facilities which currently needs to be upgraded.</p> <p>Based on document review on the stakeholder consultation on 27/10/2022, sighted request of new building. In response to the request, Segaria Estate has included into Management Plan on Social Assessment for the year 2023 updated February 2023.</p> <p>Based on the action plan, Segaria Estate proposed Capital Expenditure of Main Budget 2013 to include new CLC School Building with estimated cost MYR xxx,xxx.xx.</p> <p>Official letter ref. doc.: Bil (131) SE-111/3/01/-03P dated 16/01/2023 issued to headquarters which include with items proposed for new CLC school Building (Upgrade). This proposal is supported Head of Business Unit due to current location</p>		

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	<p>of the education facility is still using the converted from Old Masjid nearby the labour line with poor conditions.</p> <p>However, as at audit date headquarters still on hold status on the proposal. This matter raised as OFI for auditor to follow up on next assessment on the proposed status.</p>
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Noteworthy Positive Comments	
1	Good commitment from the management teams on the documentation and preparation of the audit
2	Good and comprehensive management plan
3	Positive feedbacks from employee on handling internal issues

3.3 Status of Nonconformities Previously Identified and OFI

Non-Conformity Report			
NCR Ref #:	2152915-202201-M1	Issue Date:	14/01/2022
Due Date:	13/04/2022	Date of Closure:	27/04/2022
Area/Process:	Boustead Segaria Estate	Clause & Category (Major / Minor)	MSPO 2530 Part 3: 4.4.5.3 Major
Requirements:	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.		
Statement of Nonconformity:	Deduction of pay for sample workers does not fully meet legal conditions.		
Objective Evidence:	<p>Based on the sample pay slips for the month of February 2021 salary, it was found that there's a store deduction for the following sample employees:</p> <ul style="list-style-type: none"> - Employee ID # 2749; Group: P; Div.: A; Male; Store deduction: RM 35.50 - Employee ID # 1625; Group: P; Div.: A; Male; Store deduction: RM 1.17 <p>However, no authorized Labour Department (JTK) salary deduction permits available for the store deduction made. Hence, a Major Non-compliance has been raised on the matter.</p>		
Corrections:	With immediate effect no store deduction will be made from workers' salary.		
Root cause analysis:	Application for store deduction has been submitted but did not receive approval from Jabatan Tenaga Kerja (JTK).		
Corrective Actions:	Comply at all times with the issued permit for deduction by JTK		
Assessment Conclusion:	<p>CAP has been accepted. Evidence of CAP effectiveness has been verified as following:</p> <ul style="list-style-type: none"> - Internal memo # 02/2022 dated 15/1/2022 by Estate Senior Manager to all Senior Managers, Chief Clerk, Checkroll Clerks and Field Supervisors to discontinue store deduction with immediate effect - Follow-up email with JTK Sabah on permit application status 		

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	<p>- Monitoring of compliance for payslip by estate management and sustainability personnel</p> <p>Based on the evidence of CAP implementation, the Major NC confirmed to be effectively addressed and closed on 13/4/2022.</p>
Verification Statement:	<p>Deduction of pay for sample workers does not fully meet legal conditions.</p> <p>Based on sample of payslip from different types of works, gender and origin countries in Segaria Estate, it has been found that salary payment is not according to Minimum Wages Order 2022 which is RM57.69/day.</p> <ol style="list-style-type: none"> 1. 2738, Basic Wages 465.11, Work: 24 days, Ave Wage: MYR27.36. 2. 1427, Basic Wages: 993.00, Work: 25 days, Ave Wage: MYR39.72. 3. 1649, Basic Wages: 431.86, Work: 24 days, Ave Wage: MYR25.40. 4. 1785, Basic Wages 985.64, Work: 23 days, Ave Wage: MYR42.85. <p>Therefore, audit team decide to re-raise this non-conformity during this assessment.</p>

Non-Conformity Report			
NCR Ref #:	2152915-202201-M2	Issue Date:	14/01/2022
Due Date:	13/04/2022	Date of Closure:	27/04/2022
Area/Process:	Boustead Segaria POM	Clause & Category (Major / Minor)	MSPO 2530 Part 4: 4.5.1.2 Major
Requirements:	<p>The environmental management plan shall cover the following:</p> <p>b) The aspects and impacts analysis of all operations</p>		
Statement of Nonconformity:	Environmental aspect and impact assessment were not available.		
Objective Evidence:	Environmental aspect and impact assessment for one (1) unit of Dust Particulate Reduction System Boiler's ESP which was recently installed and operated at Segaria Palm Oil Mill was not available.		
Corrections:	Immediately prepare assessment the potential EAI for New Boiler ESP		
Root cause analysis:	The Management has implemented EAI but no assessment for new machinery.		
Corrective Actions:	The Management will ensure proper management and monitoring in future.		
Assessment Conclusion:	<p>CAP has been accepted. Evidence of CAP effectiveness has been verified as following:</p> <ul style="list-style-type: none"> - Environmental aspects and impacts assessment records for New Boiler ESP - Monitoring of compliance for payslip by estate management and sustainability personnel <p>Based on the evidence of CAP implementation, the Major NC confirmed to be effectively addressed and closed on 13/4/2022.</p>		
Verification Statement:	<p>Verified records of the EAI for 2022/23 form serial no EAI/2022/016-1</p> <p>ESP operation has been included in the list of EAI operation of the mill dated 21/01/2022. Aspects identified as follows.</p> <ol style="list-style-type: none"> 1. Electrical Power Consumption 2. Combustion Emission 		

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	3. Waste Disposal There was no recurrence of non-conformity. Thus, the NCR remains closed.
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Non-Conformity Report			
NCR Ref #:	2152915-202201-N1	Issue Date:	14/01/2022
Due Date:	Next Assessment	Date of Closure:	Open
Area/Process:	Boustead Segaria Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.4.5.4, Minor
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:	Sample employee of contractor is not fully ensured to be paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.		
Objective Evidence:	<p>Based on Work Agreement for a sample Contractor’s (Asniey Jaya Enterprise) Worker ID # AT 968315; Post: Bin Lorry Driver. It was found that the conditions stated that rate of pay for the worker is 18% from Estate Payment where in case of Estate payment is RM5,000.00, the total payment for the worker will be 18% = RM900 with additional conditions that the worker entitled for RM1,100.00/month or RM42.31/day maximum rate as per Minimum Work Order 2018. For sample month of May 2021, it was found that the worker has been working for 27 days with total gross salary of Rm1,510.00.</p> <p>Based on the records of estate FFB Summary 1/5/2021 - 31/5/2021, total amount of estate payment to contractor for the worker’s work was RM5,315.16 where a calculated amount of RM956.70 is supposed to be paid as the worker’s salary.</p> <p>However, the amount does not reflective of actual pay listed in the worker’s pay slip and there’s no clear records of payment of the worker for its work on the additional day (27 days work instead of 25 available normal working days for month of May 2021). The payment for contractor also included bin handling where a total amount of RM885.86 was allotted for month of May 2021.</p> <p>Due to the lack of information and inconsistency in the payslip, it was uncertain whether the worker’s pay was according to the agreement or legal requirement. Furthermore, the agreement still referred to the outdated Minimum Wage Order 2018 although the agreement was signed on 4/1/2021.</p> <p>Due to the inconsistency, hence a Minor NC has been raised on the matter.</p>		
Corrections:	Term for rate of pay has been revised accordingly for year 2022 contract. Minimum wages Order 2020 duly insert in the new agreement to supersede the previous Act.		
Root cause analysis:	Condition for rate of pay to the workers wrongly stated in the agreement. Actual rate is 28% instead of 18% stated in the agreement.		
Corrective Actions:	Management to monitor contractor employees are being paid according to mutual agreement at all times by verifying the payslip.		
Assessment Conclusion:	CAP has been accepted. Evidence of CAP effectiveness will be verified in next assessment.		

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Verification Statement:	<p>Based on evidence, verified the sampled contractor had revised agreement include the changes of 28% of rate of pay to worker. The agreement signed by both parties on 28/11/2022.</p> <p>Verified the latest payslip for sample contractor’s Asnie Jaya Enterprise, confirmed the contractor implement the 28% of rate of pay to worker as stated in revised agreement version.</p> <p>The implementation of corrective action plan is at satisfactory and therefore, previous Minor NC closed on 23/02/2023.</p>
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Opportunity For Improvement		
Ref:	OFI 1	Clause: MSPO 2530 Part 4: 4.4.4.2
Area/Process:	Boustead Segaria Palm Oil Mill	
Objective Evidence:	Safety Data Sheet (SDS) for chemicals stored and used such as engine oil, grease, hydraulic oil was only available in English language. However, SDS in national language (Bahasa Malaysia) could be made available for ease of understanding as stated in OSH (Classification, Labelling and Safety Data Sheet of Hazardous Chemicals) Regulations 2013 (CLASS Regulations). [i.e., Reg 13 (3) (b)].	
Verification Statement:	Sighted the following SDS both languages English and Bahasa Malaysia were made available and at respective site.	
	Chemical	SDS Date
	1 Sulfuric Acid	27/02/2021
	2 Ammonia Buffer Solution	27/02/2021
	3 Phenolphthalein Indicator 1%	27/02/2021

Opportunity For Improvement		
Ref:	OFI 2	Clause: MSPO 2530 Part 3: 4.4.4.2
Area/Process:	Boustead Segaria Estate	
Objective Evidence:	Safety Data Sheet (SDS) for chemicals stored and used such as engine oil, grease, hydraulic oil was only available in English language. However, SDS in national language (Bahasa Malaysia) could be made available for ease of understanding as stated in OSH (Classification, Labelling and Safety Data Sheet of Hazardous Chemicals) Regulations 2013 (CLASS Regulations).	
Verification Statement:	The following SDS was sighted having both languages English and Bahasa Malaysia were made available and kept at site.	
	Chemical	SDS Date
	1 Bayfolan	22/02/2020
	2 CALIME (CaCO3 / CaO	06/01/2022
	3 Ancom Amine 48	25/11/2020
	4 Thiram 80% WP	06/01/2022

3.4 Summary of the Nonconformities and Status

CAR Ref.	Clause & Category (Major / Minor)	Issued Date	Status & Date (Closure)
2313686-202302-M1	MSPO 2530 4.1.3.1 Part 3- Major	23/02/2023	Closed on 19/05/2023
2313686-202302-M2	MSPO 2530 4.4.5.3 Part 3- Major	23/02/2023	Closed on 19/05/2023

3.5 Issues Raised by Stakeholders

IS #	Description
1	<p>Issues: Gender representative for each operating unit</p> <p>2 gender representatives for each operating have been interviewed. Based on the interview, there is evidence that all female workers can participate in gender committee and has been invited for meeting that will be conducted every 6 months. As per interview, it has been confirmed that grievance procedure for any harassment has been communicated and all representatives can demonstrate their understanding on the procedure. Other than that, pregnancy test has not been conducted for female workers but only self-assessment on pregnant symptom such as period delay will be submitted online on monthly basis. Representative also has been asked on discrimination and has been confirmed there is no discrimination has been practiced. All female workers received same benefits, leave and others. New mother assessment has been conducted for each operating units and has been confirmed by one of representative which also new mother.</p>
	<p>Management Responses:</p> <p>No further verifications required.</p>
	<p>Audit Team Findings:</p> <p>No action required.</p>
2	<p>Issues: Mr Azis Passangan/Kampung Sipit Magai</p> <p>Head of village for Kampung Sipt Magai, Mr Azis Passangan has been interviewed. Most of the villagers works as public and government servant, village works and own their own oil palms farm. Based on the on the interview, it has been confirmed that good relationships have been between both parties. They also mentioned that there are no operation/ activities in estates and POM that give adverse effect to the local communities. Any vacancies in estate/POM will be posted at notice board and nearby coffee shops at the village area. As per interview, some villagers work in the estate and POM. There are no cases of pollution has happened and identified by the villagers. There are also no issues of land dispute/ customary right land in Segaria Estate/ POM which has been confirmed by Mr Azis who already reside at that area for than more than 20 years.</p>
	<p>Management Responses:</p> <p>No further verifications required.</p>
	<p>Audit Team Findings:</p> <p>No action required.</p>
3	<p>Issues: Worker’s representative for Segaria Estate and Segaria POM</p> <p>Mr Aidil has been appointed as president for workers union in Segaria Estate. He mentioned he has been elected through election that has been conducted without interference of the management. He said all workers and staff can join the workers union except executive. For now, there is no request from the workers union and routine meeting will be conducted at least once a year. Responded to question on</p>

	<p>promotion, he said that all promotion is based on the recommendation by the section lead, appraisal approval by the management. If there is grievance/appeal on the promotion, it can be communicated with representative from workers union and the issues will be forwarded to the management.</p> <p>Management Responses: No further verifications required.</p> <p>Audit Team Findings: No action required.</p>
4	<p>Issues: Neighbouring estate/ Sukhatta Haris/ Lai Kar Wan Plt Lai Kar Wan plantations is located around 2 km from Segaria Estate where all staff/workers are using Segaria Estate to access to Semporna town. There are no boundaries for Lai Kar Wan Plantations with Segaria Estate. There is no land dispute which both estates have their own legal ownership from Sabah state government. Good relationships have been maintained and issues will be discussed through meeting and phone call. He also aware method/mechanism of communication if there are any issues related to land.</p> <p>Management Responses: No further verifications required.</p> <p>Audit Team Findings: No action required.</p>
5	<p>Issues: Asniey Jaya Enterprise/ Kedai Nurhayati During the interview, one of stakeholders mentioned that she has lodged complaint to assistant manager regards to sundry shops. However, until the day of audit, there is no respond by the management. Interviewed with the contractors confirmed that the wages of workers will be paid only after they received payment from Segaria Estate, which is normally after 10th of the following month.</p> <p>Management Responses: No further verifications required.</p> <p>Audit Team Findings: No action required.</p>
6	<p>Issues: Aldaon bin Abdullah/ S.K Segaria S.K Segaria is located inside the area of Segaria Estate. The headmaster of S.K Segaria confirm that good relationships has been maintained by both parties where estate has provided contribution in term of manpower and expenses for any school activities. Complaint procedure and consultation procedure has been communicated to them during the stakeholders meeting. It has been confirmed with headmaster that all kids which working at Segaria Estate/POM attended school and there are no kids helping their parent at the field.</p> <p>Management Responses: No further verifications required.</p> <p>Audit Team Findings: No action required.</p>
7	<p>Issues: Kemal Abhisefa/ CLC Segaria Mr Kemal Abhisefa is a teacher for community learning centre (CLC) in Segaria Estate which provided education to Indonesian kids which studies at secondary level. He mentioned that not kids from Segaria POM/Estate attended CLC but also kids from the surrounding the area. As for now, there is 2 teachers</p>


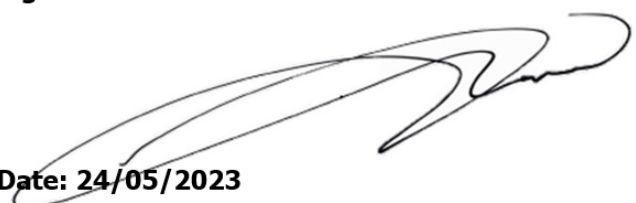
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<p>with 4 assistant helpers. He appreciates commitment that has been given by the estates to ensure school building has been maintained and school operation run smoothly. He also asked is there any planning to enlarge/ replace current school which current can't cope up with numbers of student.</p>
<p>Management Responses: Official letter ref. doc.: Bil (131) SE-111/3/01/-03P dated 16/01/2023 issued to headquarters which include with items proposed for new CLC school Building (Upgrade). This proposal is supported Head of Business Unit due to current location of the education facility is still using the converted from Old Masjid nearby the labour line with poor conditions. However, as at audit date headquarters still on hold status on the proposal. This matter raised as OFI for auditor to follow up on next assessment on the proposed status.</p>
<p>Audit Team Findings: Based on document review on the stakeholder consultation on 27/10/2022, sighted request of new building. In response to the request, Segaria Estate has included into Management Plan on Social Assessment for the year 2023 updated February 2023. Based on the action plan, Segaria Estate proposed Capital Expenditure of Main Budget 2013 to include new CLC School Building with estimated cost MYR xxx,xxx.xx. As per verified by the auditor, budget to construct new school building has been included in the capital expenditure for year 2023 and yet to be approved.</p>

3.6 List of Stakeholders Contacted

<p>Government Officer: Sek. Keb. Segaria</p>	<p>Community/neighbouring village: Kampung Sipit Magai CLC Segaria</p>
<p>Suppliers/Contractors/Vendors: Lai Kar Wan Plantation Sdn. Bhd. Kedai Nurhayati Asnie Jaya Enterprise</p>	<p>Worker's Representative/Gender Committee: Worker Representative Gender Representative from each Operating Units</p>

Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings	
Based on the findings during the assessment Boustead Emastulin Sdn. Bhd. - Segaria Business Unit Certification Unit complies with the 2530-3:2013 and MS 2530-4:2013 . It is recommended that the certification of Boustead Emastulin Sdn. Bhd. - Segaria Business Unit Certification Unit is approved and/or continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: Mitah Binti Limpu	Name: Mohd Nur Amin Bin Mohd Halim
Company name: Boustead Plantations Berhad	Company name: BSI Services Malaysia Sdn. Bhd.
Title: Sustainability Executive	Title: Client Manager
Signature:  Date: 31/05/2023	Signature:  Date: 24/05/2023

Appendix A: Summary of the findings by Principles and Criteria

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

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	A policy for the implementation of MSPO shall be established. - Major compliance -	Segaria Estate adopted Boustead Plantations Berhad (BPB) Group’s established policy for the implementation of MSPO which was signed by Chief Executive Officer dated 02/12/2021. Segaria Estate conduct briefing on MSPO policy to workers dated on 11/01/2023 during muster morning.	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	BPB Group policy established emphasized on the engagement and commitment to produce sustainable palm oil with the objective of continuously improving the estate operation. The policy emphasized the commitment of continuously improve the effectiveness of quality management system for company’s traceability and transparency of supply chain. The policy also emphasized commitment of continuous stakeholder engagement that strive to continue to be an active supporter of the sustainability initiative and will work to strengthen MSPO standards and adherence to it.	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.	BPB Group HQ team plan to audit Segaria Business Unit on 13/12/2022 until 15/12/2022. BPB Group established Internal audit procedure, rev.02, issue no.01,	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>updated on 24/05/2022.</p> <p>As per SOP established, the internal audit shall be carried out once a year guided by the annual audit schedule. Follow up audit can be carried out as and when it is required. The GE Department/Sustainability Chairman will fix the date of the audit with management representative. Internal Audit was conducted on 13/12/2022 until 15/12/2022 by HQ Team.</p>	
4.1.2.2	<p>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.</p> <p>- Major compliance -</p>	<p>BPB Group established Internal audit procedure, rev.02, issue no.01, updated on 24/05/2022.</p> <p>The procedure established a system that may be utilized to comply with the relevant element of a formal certification scheme.</p> <p>For each non-conformance noted, the management representative will propose corrective action plan necessary and time for completion. Where possible, corrective actions are discussed with the management representative during the closing meeting. An investigation finding is also required to study the reason for such non-conformance. If any case, the operating unit can propose and communicate the corrective actions to the lead auditor from time to time. Operating unit should give response or action plan within 2 weeks. All corrective action together with evidence shall be submitted to Lead Auditor within one (1) month form the date of audit.</p> <p>Internal Audit was conducted on 13/12/2022 until 15/12/2022 by HQ Team.</p> <p>Document review of Internal Audit Report with report No.: 01/2022, 1 finding raised with NCR Category as Critical/Major. The finding issued being review by lead auditor on 06/01/2023. which were all resolved and verified closed by the lead auditor on 06/01/2023.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	All records related to Internal Audit was well maintained and made available for review. The operating units maintained all audit reports and corrective action plan and available for review.	Complied
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	Segaria Business Unit conduct management review with minutes records on 12/01/2023. The meeting attended by the Head of Business Unit Head, all operating units’ managers, and committee members. Document review on minutes of meeting, verified the meeting agenda includes with the discussion on the internal audit conducted on 13/12/2022 until 15/12/2022. The discussion is to review the continuous correction plan and improvement based on nonconformity closed on 06/01/2023. <u>Major Non-conformance (Major NC)</u> The changes in the HCV ha (a major changes in the ha statement) were not discussed in the Management Review meeting. 1. Minutes of Management Review Meeting on the following dates reviewed not included agenda of HCV hectarage changes. Minutes of meeting dated 18/11/2021 (attended 14 participants) 2. Minutes of meeting dated 15/01/2022 (attended 17 participants)	Major Non-conformance
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.	Segaria Estate updated their individual Continuous Improvement Plan for year 2023 includes elements of social and environmental. The plan established based on outcome from stakeholders meeting and	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	nonconformance raised during internal/external audit. Based on document review, the plan updated on 10/01/2023 includes the potential issues raised, impact, opportunities for improvement and timelines. The updated plan has considered by includes with safety and health elements.	
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 -	Segaria Estate adopt BPB Group’s system to improve practices in line with new information and techniques such as using the social board, external stakeholder meeting, management meeting and morning muster rollcall as platform to disseminate information.	Complied
4.1.4.3	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. - Major compliance -	Continuous action to train all workers on current technic as well as technology as specified in indicator 4.1.4.2 above was well provided as established in annual training program.	Complied
4.2 Principle 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. - Major compliance -	Segaria Estate is transparent and open to communicate its information on environmental, social and legal issues related to sustainability practice to its stakeholders. Latest external stakeholder meeting conducted at meeting room Segaria Estate’s office on 27/10/2022. The agenda of meeting includes company policies, communication procedures (any complaint/grievance channel through phone called (089-707315), email (segariaest@bplant.com.my), official letter to managers and request/response form), emergency action plan, buffer zone & recovery	Complied

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Criterion / Indicator		Assessment Findings	Compliance															
		HCV area, mill process flow, introduction on MSPO & RSPO certification, Force labour indicator, social amenities, environmental recovery and questionnaire session. No negative feedbacks received during the session. 36 externals attended involve suppliers, contractors, transporters, neighbouring estates, government agencies and school.																
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 -	Segaria Estate kept copies all management documents publicly available. Copies of the document includes environmental and social issues, plans for pollution prevention, records of complaints and grievances. BPB Group’s policies such as Pesticide Use Policy, Human Rights Policy, Foreign Workers Policy, etc are available publicly in company website; https://www.bousteadplantations.com.my/sustainability-approach-policies/ .	Complied															
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 -	Segaria Estate adopt BPB Group’s Consultation Procedure established includes the objectives as follow. 1. Change of information and sharing of ideas between estate management and internal as well as external stakeholders 2. To assess and identify relevant topics for mutual benefits The procedure describes type, method and frequency of consultations as follow table. <table border="1"> <thead> <tr> <th>Type</th> <th>Method</th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td>Muster call</td> <td>Assembly</td> <td>Daily</td> </tr> <tr> <td>Management meeting</td> <td>Face to face</td> <td>Weekly</td> </tr> <tr> <td>Staff meeting</td> <td>Face to face</td> <td>Monthly</td> </tr> <tr> <td>Workers’ meeting</td> <td>Face to face</td> <td>6-monthly</td> </tr> </tbody> </table>	Type	Method	Frequency	Muster call	Assembly	Daily	Management meeting	Face to face	Weekly	Staff meeting	Face to face	Monthly	Workers’ meeting	Face to face	6-monthly	Complied
Type	Method	Frequency																
Muster call	Assembly	Daily																
Management meeting	Face to face	Weekly																
Staff meeting	Face to face	Monthly																
Workers’ meeting	Face to face	6-monthly																

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Criterion / Indicator		Assessment Findings			Compliance
		Stakeholders' meeting	Face to face	Annually	
		Public notification	Signboard	As required	
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 -	Segaria Estate maintained by nominated Ms. Nor Fadzillah Binti Abdul Rahim as person in-charge of communication with appointment letter since 01/01/2019.			Complied
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. - Major compliance -	<p>Segaria Estate maintained records of list of stakeholders with internal updated on 11/01/2023 and external updated on 15/01/2023.</p> <p>Latest external stakeholder meeting conducted at meeting room Segaria Estate's office on 27/10/2022. The agenda of meeting includes company policies, communication procedures (any complaint/grievance channel through phone called (089-707315), email (segariaest@bplant.com.my), official letter to managers and request/response form), emergency action plan, buffer zone & recovery HCV area, mill process flow, introduction on MSPO & RSPO certification, Force labour indicator, social amenities, environmental recovery and questionnaire session. No negative feedbacks received during the session. 36 externals attended involve suppliers, contractors, transporters, neighbouring estates, government agencies and school.</p> <p><u>Opportunity for Improvement (OFI)</u></p> <p>Onsite interview with CLC teachers informed they are required assistance from Boustead's management to look into education facilities which currently needs to be upgraded.</p> <p>Based on document review on the stakeholder consultation on 27/10/2022, sighted request of new building. In response to the request, Segaria Estate has included into Management Plan on Social Assessment for the year 2023 updated February 2023.</p>			OFI

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Based on the action plan, Segaria Estate proposed Capital Expenditure of Main Budget 2013 to include new CLC School Building with estimated cost MYR xxx,xxx.xx.</p> <p>Official letter ref. doc.: Bil (131) SE-111/3/01/-03P dated 16/01/2023 issued to headquarters which include with items proposed for new CLC school Building (Upgrade). This proposal is supported Head of Business Unit due to current location of the education facility is still using the converted from Old Masjid nearby the labour line with poor conditions.</p> <p>However, as at audit date headquarters still on hold status on the proposal. This matter raised as OFI for auditor to follow up on next assessment on the proposed status.</p>	
Criterion 4.2.3 – Traceability			
4.2.3.1	<p>The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s).</p> <p>- Major compliance -</p>	<p>Segaria Estate adopt BPB Group’s Traceability procedure includes the FFB Traceability Flowchart system. The flowchart system established with objective to monitor Estate Structured Crop Recovery Assessment.</p>	Complied
4.2.3.2	<p>The management shall conduct regular inspections on compliance with the established traceability system.</p> <p>- Major compliance -</p>	<p>Segaria Estate adopt BPB Group’s Traceability procedure describes operating unit to regularly inspect on compliance periodically as internal audit as method to inspect as specified in Criterion 4.1.2.</p> <p>Additional, BPB Group’s Sec. 1.1, Internal Office Control of Administrative Procedure, Chapter.01 dated 02/05/2012 describe routine responsibilities of estate management and staff to conduct related inspections on compliance of all operations including traceability system.</p> <p>Segaria Estate conduct inspection for traceability system on daily basis. The staffs would prepare all the documents and the assistant manager</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		will check and verified the content. FFB delivery record from estate to mill was sighted and verified.	
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	Segaria Business Unit maintained the appointment En. Mohd Hamdan Bin Husin as Traceability Chairman with appointment letter remain on 18/01/2021.	Complied
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	<p>Segaria Estate adopt BPB Group’s Traceability procedure includes the FFB Traceability Flowchart system. The flowchart system established with objective to monitor Estate Structured Crop Recovery Assessment.</p> <p>Segaria Estate adopt BPB Group’s Sales of Produce Ex-Estate/Mill Procedures dated 2/5/2012 were to maintain FFB Weighbridge Tickets, FFB Delivery Note and Daily Record of FFB Summary Logbook.</p> <p>Segaria Estate adopt BPB Groups’ Retention of Documents procedure as describes in Chapter 13 that the operating units maintain document with minimum retention period of seven (7) years prior of disposal. Document review on FFB delivery including FFB Weighbridge Tickets, FFB Delivery Note and Daily Record of FFB Summary Logbook as follow sample.</p> <p><u>FFB</u> Ticket No: 472809, 03/01/2023 Delivery Note: A 138286, Field: BLK 97/98, PM 99G1 Bunches: 389 Vehicles: ST 2592 P Weighbridge: 472809, Weight: 6,630 kgs</p> <p><u>FFB</u> Ticket No: 473213, 15/01/2023 Delivery Note: A 138627, Field: BLK 58/56, PM 10B/ 10A</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		Bunches: 210 Vehicles: SA 5406C Weighbridge: 473213, Weight: 7,780 kgs <u>FFB</u> Ticket No: 473582, 27/01/2023 Delivery Note: A 138944, Field: BLK 72, PM 11D Bunches: 127 Vehicles: SAA 5310G Weighbridge: 473582, Weight: 11,820 kgs	
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. - Major compliance -	Segaria Estate maintained the list of permit and license required for the operations of the estate were sighted and updated 14/12/2022. The sample of permit and license as follow: 1. MPOB License 504677002000 valid until 31/03/2024. 2. Lesen Untuk Menggaji Pekerja Bukan Pemastautin for 19 Philippines valid until 21/10/2023. 3. Diesel Storage Permit No.: S 010222 for Diesel of 43,200 litre and Petrol of 2,000 litre valid until 15/01/2023. 4. Permit Potongan Daripada Gaji Pekerja with No. 600/1/2/16(11/SPN/2020-0120) valid until 18/07/2024. 5. Fertilizer Storage Permit valid until 15/02/2022. 6. Lesen Bagi Pemasangan Persendirian Akta Bekalan Elektrik 1990 valid	OFI

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		<p>until 18/09/2023.</p> <p><u>Opportunity for Improvement (OFI)</u></p> <p>Management may further improve to clarify with NRA assessor on the grass cutter requirement to under the annual audiometry test due discrepancy in the NRA report page 23 (item on others) and page 24 (item 8.3 - audiometric testing program).</p>	
4.3.1.2	<p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>Segaria Estate adopt BPB Group’s Legal and Other Requirements Register (LORR) established to cover all legal acts, regulations and other requirement. The sample of Act and Legal:</p> <ol style="list-style-type: none"> 1. Children and Young Person (Employment) (amendment) Act 2010 Updated November 2020 2. Environmental Quality (Amendment) Act 2012 Updated April 2020 3. Sabah Labour Ordinance 1950 4. OSHA 1994 5. Electrical Supply (Amendment) Act 2015 	Complied
4.3.1.3	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>Segaria Estate adopt BPB Group’s Legal and Other Requirements Register (LORR) established to cover all legal acts, regulations and other requirement. LORR was reviewed annually with latest review was conducted on 01/08/2022. The sample of Act and Legal:</p> <ol style="list-style-type: none"> 1. Occupational Safety and Health Act 1994 2. Factories and Machinery Act 1967 3. Environmental Quality (Amendment) Act 2012 Updated April 2020. 4. Children and Young Person (Employment) (amendment) Act 2010 Updated November 2020 5. National Wages Consultative 	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	<p>Segaria Estate manager remain the appointment Mrs Fadzillah Binti Abdul Rahman as person in-charge to monitor compliance and track update the changes in regulatory requirements.</p> <p>Document review sighted appointment letter without any changes with date on 18/01/2021.</p> <p>BPB Group maintain the method of tracking system 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). BPB Group centralized system for tracking any changes in the law and subscribe into Lawnet.</p>	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	<p>The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.</p> <p>- Major compliance -</p>	<p>Segaria Estate’s oil palm cultivation activities do not diminish the land use rights of other users. The conditions stipulated in the land titles were adhered to.</p>	Complied
4.3.2.2	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.</p> <p>- Major compliance -</p>	<p>Segaria Estate able to show their legal ownership with evidence of three (3) land titles registered under company’s name Boustead Emastulin Sdn. Bhd., kept with effect from 20/5/2005 and 25/8/2005. The documents kept as follow.</p> <ol style="list-style-type: none"> 1. Provisional Lease # 26290060 dated 24/10/74 (7,317 Acre) Ref. # L.S.1210/1/3/II,25/8/2005 change of name from Ladang Segaria Sdn Bhd to Boustead Emastulin Sdn Bhd 2. Provisional Lease # 126290122 dated 1/1/65 (4,012 acres) Ref. # L.S.1210.1.3/II, dated 20/5/2005 change of name from Ladang Segaria Sdn Bhd to Boustead Emastulin Sdn Bhd 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		3. Provisional Lease # 125311284 dated 17/4/75 (398.9 Acres) Ref. # L.S.1210.1.319, dated 20/5/2005 change of name from Ladang Segaria Sdn Bhd to Boustead Emastulin Sdn Bhd Sighted latest authorized payment as per Land Cess Payment 2021 – Segaria Estate; Letter ref. # (02) SE-111/06/07-01B; Date: 29/12/2021 to Majlis Daerah Semporna.	
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	Onsite visit sighted the legal perimeter boundary marker is available with boundary markers were installed at various points at the boundary areas. Site visit to boundary at field 94K with Mount Pock Forest, found that the boundary stone (04° 29' 54.3" N, 118° 24' 03.5" E) was maintained and peg using wooden peg.	Complied
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	BPB Group's established Fair Compensation Procedure (Procedure 6.4.1); Ref. # 1; issued date: 4/2/2015; version 01. The procedure has clearly stated the process of negotiation and compensation if any land disputes with Legal Department. If the negotiation process failed, legal proceedings will be the next action. However, there was no land dispute at the sampled estate. The company has the legal ownership documents as demonstrated by possessing land titles.	Not Applicable
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	There was no land dispute at the sampled estate. The company has the legal ownership documents as demonstrated by possessing land titles.	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should be made available. - Minor compliance -	There was no land dispute at the sampled estate. The company has the legal ownership documents as demonstrated by possessing land titles.	Not Applicable
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	There was no land dispute at the sampled estate. The company has the legal ownership documents as demonstrated by possessing land titles.	Not Applicable
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	BPB Group's HQ hired third party's consultant to established Social Impact Assessment for Boustead Emastulin Sdn. Bhd. covered Segaria Estate and Mill, Semporna, Sabah, Malaysia date from 27/09/2017 until 01/10/2017. Site of Assessment Area is 3,071.60 ha (Main Div) and 1,393.50 ha (Sipit Division). Objective of the assessment remain with no changes as follow. 1. To collect all the information related to social issues and workers' livelihood in Segaria Estate and Mill. 2. To propose management actions based on the identified social impacts. 3. To provide recommendations to manage the social impacts that have occurred and to anticipate the social impacts that are likely to arise (advancing benefits and mitigating adverse effects) and, 4. To propose monitoring measures for the identified impacts to demonstrate continuous improvement.	Complied

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		<p>From the assessment conduct, Segaria Estate collect feedback with relevant issues from external stakeholders meeting into Social Action Plan Year 2023 dated 01/02/2023.</p> <p>Latest external stakeholder meeting conducted at meeting room Segaria Estate’s office on 27/10/2022. The agenda of meeting includes company policies, communication procedures (any complaint/grievance channel through phone called (089-707315), email (segariaest@bplant.com.my), official letter to managers and request/response form), emergency action plan, buffer zone & recovery HCV area, mill process flow, introduction on MSPO & RSPO certification, Force labour indicator, social amenities, environmental recovery and questionnaire session. No negative feedbacks received during the session. 36 externals attended involve suppliers, contractors, transporters, neighbouring estates, government agencies and school.</p> <p>Document review on the action plan as follow example: Other facilities: Estate canteen and grocery stores. Matters raised: Affordable goods price sold to workers. Monitoring: Selling price always been supervised by assistant and supervisor to avoid excessive price charged by seller. Status: Continuous practice</p> <p>Document review, sighted estate management received the list of goods sold by grocer on quarterly basis with latest by January 2023 as mechanism to monitor goods sold to workers at affordable price.</p>	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented.	BPB Group established Policy and Procedures – Grievance Procedure with Doc. No.: HR/2022/023/003, Rev.0 update on 01/03/2022.	Complied

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	- Major compliance -	<p>The procedure describes immediate superior need to respond within 3 days of the complaint received and further 5 days if the respond has not been satisfied. It has been verified through interview that the system able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.</p> <p>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.</p>	
4.4.2.2	<p>The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.</p> <p>- Major compliance -</p>	<p>The Complaint/Suggestion forms available in the suggestion box area in front of the estate office. Consultation made with the stakeholders confirmed that they are aware and understood about the complaint procedure.</p> <p>Based on the records, all the complaints were lodged by internal stakeholders and generally about defects of housing facility, and request of facility (e.g. transport to town, extension of electricity supply).</p> <p>There was no complaint or grievance lodged by external stakeholder since the last assessment. Verification of the records of complaints lodged the actions taken by the management were found to be appropriate and timely manner.</p>	Complied
4.4.2.3	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.</p> <p>- Minor compliance -</p>	<p>The complaint forms were available at the operating unit's office, where the stakeholders can easily access should it be needed. Among the information available in the form is name of requestor/complainant, date of request, details of complaint/grievance, details of action taken including dates and acknowledgement signature of the requestor.</p>	Complied
4.4.2.4	<p>Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.</p>	<p>Employees and the surrounding communities were made aware that complaints or suggestions can be made any time through various</p>	Complied

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	- Minor compliance -	meetings such as morning muster, training/briefing and stakeholder consultation. Based on interview with the stakeholders, it was noted that they were aware of the complaint's procedure. Latest external stakeholder meeting conducted at meeting room Segaria Estate's office on 27/10/2022. The agenda of meeting includes company policies, communication procedures (any complaint/grievance channel through phone called (089-707315), email (segariaest@bplant.com.my), official letter to managers and request/response form) and questionnaire session. 36 externals attended involve suppliers, contractors, transporters, neighbouring estates, government agencies and school.	
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance -	Segaria Estate maintained complaints and resolutions record over the past 24 months (i.e. from February 2020) and all the records are available as at audit. The management has started to implement the complaint form since implementation of RSPO certification in October 2017. The records of complaint were available from October 2017 up to date.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - Minor compliance -	BPB contribute to local development in consultation with the local communities. 1. BPB HQ committed to advancing its business sustainably while propelling the economic growth of the surround communities for obtained approximately 4% of total external FFB from surrounding smallholders. 2. Biodiversity protection and conservation of HCV areas. Empowering Orang Asli through business opportunist by employed them to work	Complied

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	<p>in BPB estates.</p> <ol style="list-style-type: none"> 3. BPB HQ engages with smallholders and out-growers on NDPE commitment to purchase FFB from responsible source and requirement for them to comply with the 'No Deforestation, No Peat and No Exploitation' commitment as per BPlant Sustainability Policy on 14/02/2023. 4. BPB HQ conduct Kotak Rezeki initiative benefits hundreds of surrounding communities needy on 14/11/2022. 5. BPB HQ distributes wakalah zakat to 200 army veterans through cooperation with Persatuan Veteran Angkatan Tentera Malaysia on 25/10/2022. 6. BPB HQ is continuing to contribute improvement of living condition of surrounding communities on Community Road Maintenance Programmed near Segamaha & Rimba Nilai Business Units. 7. BPB HQ has Nurturing future generations through education collaboration with Indonesia Consulate and approval of Malaysia's Ministry of Education on 23/05/2022 8. BPB HQ conduct Jelajah Kasih Ramadhan deliver smiles to 2,400 disadvantaged people especially old folks on 09/05/2022. 9. BPB HQ established Bank Pakaian BPB delivers smile to the needy on 25/04/2022. 10. BPB HQ established Jelajah Kasih Ramadan to bringing smiles to the needy especially old folks on 11/04/2022. 11. BPB HQ continuously supporting oil palm smallholders' development program on 06/04/2022. 12. BPB HQ take initiative to contribute for flood relief in Terengganu on 12/03/2022. 	

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		<p>Segaria Estate continuously support CSR programmed conducted for both internal and external communities as follow.</p> <ol style="list-style-type: none"> 1. Segaria Estate continuously engaged the COVID-19 Contribution (Positive Contact Workers). 2. Segaria Estate continuously conduct Excellent Student Award SPM to give an appreciation of excellent result among employee's children. 3. Segaria Estate with collaboration with Segaria POM continuously support Blood Donation Campaign with Hospital Semporna and Hospital Kunak. 	
Criterion 4.4.4: Employees safety and health			
4.4.4.1	<p>An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>BPB Group maintained the current Group Occupational Safety & Health Management Policy and Plan signed by the CEO dated 12/7/2021. The policy displayed prominently on notice boards in English and local language Bahasa Malaysia.</p> <p>The Policy is implemented through the OSH activities by the on-site Safety Officers and monitored by OSH Manager from Head Office. Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees, contractors & visitors. Commitment to be responsibilities of both employer & employees. The policy as committed will be reviewed/revised as deemed appropriate. In Interviews with the workers and staff during the site visit revealed that the employees have been briefed and has understood the policy.</p>	Complied
4.4.4.2	<p>The occupational safety and health plan shall cover the following:</p>	<p>a) The policy has been established and elaborated in item 4.4.4.1 above. The policy among others has mentioned the details of the</p>	Complied

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<p>a) A safety and health policy, which is communicated and implemented.</p> <p>b) The risks of all operations shall be assessed and documented.</p> <p>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:</p> <ul style="list-style-type: none"> i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied <p>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).</p> <p>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.</p> <p>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.</p>	<p>policy statement and the direction of the organisation towards implementing ESH practices. The clause "A safety and health policy, which is communicated and implemented" is mentioned in the policy. Safety briefing to employees & contractors was made in several training sessions inclusive of safety requirement of the organization.</p> <p>b) Segaria Estate identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports (ref no HQ/11/ASS/00/298-2018/131 by DAB OH Sdn Bhd) dated 14/09/2018 were verified during the assessment. HIRARC is subject for a review in event of the following.</p> <ol style="list-style-type: none"> 1. Change in work process 2. Revision/changes in legislative requirement 3. Occurrence of accidents <p>Segaria Estate had list of HIRARC review updated Jan 2023 respectively. Amendments are summarized in a list detailing dates and reasons for updates. Review on 07/04/2022 was made following an incidence relating to FFB loading.</p> <table border="1" data-bbox="1070 1061 1865 1391"> <thead> <tr> <th>No.</th> <th>Areas/ Activities</th> <th>No.</th> <th>Areas/ Activities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Palm/ bunch census</td> <td>12</td> <td>Harvesting & collection</td> </tr> <tr> <td>2</td> <td>Circle/ selective spraying</td> <td>13</td> <td>Transportation workers</td> </tr> <tr> <td>3</td> <td>Confined space</td> <td>14</td> <td>Walking palm to palm</td> </tr> <tr> <td>4</td> <td>Drainage-machine</td> <td>15</td> <td>Loose fruit collection</td> </tr> <tr> <td>5</td> <td>Grass cutting</td> <td>16</td> <td>In field machine 10 mt</td> </tr> <tr> <td>6</td> <td>Compound sanitation</td> <td>17</td> <td>Water catchment</td> </tr> <tr> <td>7</td> <td>Fertilizer application</td> <td>18</td> <td>Chemical mixing</td> </tr> <tr> <td>8</td> <td>Replanting</td> <td>19</td> <td>Nursery</td> </tr> <tr> <td>9</td> <td>Bridge maintenance</td> <td>20</td> <td>Workers quarters</td> </tr> </tbody> </table>	No.	Areas/ Activities	No.	Areas/ Activities	1	Palm/ bunch census	12	Harvesting & collection	2	Circle/ selective spraying	13	Transportation workers	3	Confined space	14	Walking palm to palm	4	Drainage-machine	15	Loose fruit collection	5	Grass cutting	16	In field machine 10 mt	6	Compound sanitation	17	Water catchment	7	Fertilizer application	18	Chemical mixing	8	Replanting	19	Nursery	9	Bridge maintenance	20	Workers quarters	
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<p>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.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>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.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 5%;">10</td> <td style="width: 60%;">Water treatment plant</td> <td style="width: 5%;">21</td> <td style="width: 30%;">Workshop operations</td> </tr> <tr> <td>11</td> <td>COVID-19 monitoring</td> <td>22</td> <td>Mechanical spraying</td> </tr> </table> <p>There are no new activities in the Estate.</p> <p>Segaria Estate expand mechanization area through purchase of additional MTG for the mature palms. This being introduced to reduce reliance on labour. Appropriate risk control measures were determined and implemented for the respective activities and operation. Most of the moving part and rotating machinery were installed with machine guarding and properly covered. Appropriate administrative controls such as safety signage were displayed at all workstations in the estate office and workshop. In general, the control measures were appropriate to the identified risks.</p> <p>c) The training held by the Estate in the CU in relation to the pesticides handling as 4.4.6.1. Included therein are the precautionary measures of products organized by the manufacturer.</p> <p>Details of other training are available 4.4.6.1 under training and competency. OSH programs are also implemented. Common programs were initiated from HQ level e.g. OSH meeting, workplace inspection, inspection on PPE, training on MSPO/RSPO etc.</p> <p>Training and briefing on the operations were provided for workers to educate them on safe working practices. This is also made to ensure that the applicable precautions are adhered. Training for employees is conducted from time to time based on needs through various method such as on the job training, briefings, meetings, etc. The staff and workers such as the storekeepers, harvesters, pruners, field workers, sprayers, fertilizer and rat bait workers were trained, and they had understood the hazards involved and how the</p>	10	Water treatment plant	21	Workshop operations	11	COVID-19 monitoring	22	Mechanical spraying	
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		<p>chemicals should be used in a safe manner. Based on the HIRARC carried out at the Estate the PPE types for the various activities were identified and recommended.</p> <p>d) The following PPE issuance record issues for the Estate in 2022/23 on selectively period were sighted and verified. Field visits to the following sites observed compliance to PPE adherence.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Work</th> <th>PPE issuance</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Harvester</td> <td>Safety helmet, sickle cover, hand glove. Wellington boots.</td> </tr> <tr> <td>2</td> <td>Sprayers</td> <td>Respirator, nitrile glove, goggles, wellington boots, apron.</td> </tr> <tr> <td>3</td> <td>Manurer</td> <td>Apron, wellington boots, dust mask, nitrile glove.</td> </tr> <tr> <td></td> <td>Gen set</td> <td>Era plug, safety shoes, safety helmet, cotton gloves.</td> </tr> <tr> <td>4</td> <td>WTP operator</td> <td>Safety boots, earmuff, safety vest, helmet, cotton glove, dust mask.</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>No.</th> <th>Estate</th> <th>Site</th> <th>Activities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Segaria</td> <td>PR22E</td> <td>Selective Weeding</td> </tr> <tr> <td>2</td> <td>Segaria</td> <td>Nursery PM 94A1</td> <td>Weeding/ P & D</td> </tr> <tr> <td>3</td> <td>Segaria</td> <td>PM00B2</td> <td>Harvesting</td> </tr> </tbody> </table> <p>e) The estate had established an SOP for chemical handling. This is available in SOP – Operational Control Procedure under subject Chemical Safety Management. This includes compliance related to:</p> <ol style="list-style-type: none"> 1. Conduct/ reassess CHRA 2. Review of chemical register 	No.	Work	PPE issuance	1	Harvester	Safety helmet, sickle cover, hand glove. Wellington boots.	2	Sprayers	Respirator, nitrile glove, goggles, wellington boots, apron.	3	Manurer	Apron, wellington boots, dust mask, nitrile glove.		Gen set	Era plug, safety shoes, safety helmet, cotton gloves.	4	WTP operator	Safety boots, earmuff, safety vest, helmet, cotton glove, dust mask.	No.	Estate	Site	Activities	1	Segaria	PR22E	Selective Weeding	2	Segaria	Nursery PM 94A1	Weeding/ P & D	3	Segaria	PM00B2	Harvesting	
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3	Segaria	PM00B2	Harvesting																																		

Criterion / Indicator		Assessment Findings	Compliance												
		<p>3. Chemical management assessment review</p> <p>4. Conduct health surveillance.</p> <p>The document was sighted and currently applicable to the estate operations.</p> <p>f) The Estate Manager was appointed as responsible person(s) for safety and health issues and chairman for OSH Committee. The Manager subsequently assigned duties of ESH coordinator to the Assistants or healthcare assistant for the down line implementation of ESH practices in the Estate. All identified Executives were officially given a letter for such an appointment. Records of regular meetings between the responsible person and workers to discuss about health and safety had been verified to the satisfactory maintained. All identified Executives were officially given a letter for such an appointment.</p> <p>Records of regular meetings between the responsible person and workers to discuss about health and safety had been verified to the satisfactory maintained. Occupational Safety Health (OSH) Committee has been established together. The OSH committee organization chart for 2023 was available. The Estate Manager is the chairman and the Sr Assistant Manager is the secretary. OSH Committee meetings were held once in three months. Review of the minutes of the meeting:</p> <table border="1"> <thead> <tr> <th>No.</th> <th>1st</th> <th>2nd</th> <th>3rd</th> <th>4th</th> <th>Appointment Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>21/12/2022</td> <td>21/09/2022</td> <td>22/06/2022</td> <td>09/03/2022</td> <td>16/07/2021</td> </tr> </tbody> </table> <p>g) The OSH Committee meetings confirmed that among the agenda discussed, included the following:</p>	No.	1st	2nd	3rd	4th	Appointment Date	1	21/12/2022	21/09/2022	22/06/2022	09/03/2022	16/07/2021	
No.	1st	2nd	3rd	4th	Appointment Date										
1	21/12/2022	21/09/2022	22/06/2022	09/03/2022	16/07/2021										

Criterion / Indicator		Assessment Findings	Compliance			
		<ol style="list-style-type: none"> 1. Passing of previous minutes and arising matters 2. Accident report (Monthly Data of Mill/Estate Safety Performance) 3. Workplace inspection 4. Safety report and programme 5. Training 6. Environmental issues 7. Other matters – COVID-19 compliance <p>h) The procedures for accident and emergencies have been established. There is formation of ERP Team & ERP for all the identified incidences. In addition the procedures have been summarized in a chart flow form and displayed for information of all employees in the estate. They includes emergencies relating fire, chemical spillage, flood and accident at work place.</p> <ol style="list-style-type: none"> 1. <i>Ahli J/Kuasa Pasukan Bertindak Kecemasan 20213 headed by the Estate Manager</i> 2. <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Kebakaran</i> 3. <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Banjir</i> 4. <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Tumpahan Kimia</i> 5. <i>Carta Aliran Pelan Tindakan Kecemasan-COVID-19</i> <p>The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were issued by SSD and amended to tailor to the situation differences in the Estate and mill.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%; text-align: center;">No.</td> <td style="width: 60%;">Emergency situation</td> <td style="width: 30%; text-align: center;">Estate</td> </tr> </table>	No.	Emergency situation	Estate	
No.	Emergency situation	Estate				

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Criterion / Indicator		Assessment Findings				Compliance															
		1	Fire		/																
		2	Oil spillage		-																
		3	Effluent overflow		-																
		4	Chemical spillage		/																
		5	Flood		/																
		6	Accident at workplace		/																
		<p>ERT members received training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The training are conducted by an accredited or qualified organization who can demonstrate their suitability to provide training.</p> <p>i) The trained personnel for the First Aid were among the employees working as field staff/ mandores. The first aid boxes were available at various points in the Estate office, workshop, and store. The Estate distributed the first aid box to the mandores and brought along to the field during operations. In addition, there are also first aid boxes kept in the office, store and workshops</p> <p>j) Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man Day MC.) This is summarized officially in the JKKP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKKP 8 a mandatory requirement with submission as follows. Accident Statistics are being maintained in a satisfactory manner.</p> <table border="1"> <thead> <tr> <th rowspan="2">No.</th> <th colspan="3">No of cases in 2022</th> <th rowspan="2">Total</th> <th rowspan="2">JKKP 8 submission</th> </tr> <tr> <th>Cases</th> <th>LTI</th> <th>Non LTI</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>2</td> <td>53</td> <td>0</td> <td>2</td> <td>12/01/2023</td> </tr> </tbody> </table> <p>The Estate incidences were related to harvesting activities and falling from trailer while performing FFB loading on 05/04/2022 at P 00C1</p>				No.	No of cases in 2022			Total	JKKP 8 submission	Cases	LTI	Non LTI	1	2	53	0	2	12/01/2023	
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1	2	53	0	2	12/01/2023																

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Criterion / Indicator		Assessment Findings	Compliance
		with LTI of 49 days. Accident investigation was made on 07/04/2022 identifying the root cause as awareness level towards SOP compliance. In general, all major incidences were attended to with proper documents maintained to address root causes and prevention measures etc.	
Criterion 4.4.5: Employment conditions			
4.4.5.1	The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees. - Major compliance -	BPB Group established the Sustainability Policy; Signed by CEO updated 02/12/2021 to implement the good social practices regarding human rights in respect of industrial harmony. 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.	Complied
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - Major compliance -	BPB Group established the Sustainability Policy; Signed by CEO updated 02/12/2021 to implement the good social practices regarding human rights in respect of industrial harmony. The company ensured all relevant parties will be treated equally and no discrimination based on race, caste, nationalities, religion, gender, age etc. Onsite interview conducted with the workers from different nationalities, gender and age confirmed that no discrimination practice by the management within Segaria Business Unit.	Complied
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	Management ensured that employees' pay, and conditions meet legal or industry minimum standards and as per agreed Collective Agreements (CA). Collective agreement between MAPA/NUPW and member sighted latest in circular number 12/2019 dated 02/04/2019.	Major NC

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Criterion / Indicator	Assessment Findings	Compliance																																				
<p>on minimum wage. - Major compliance -</p>	<p>As per Boustead Holdings Policy, collective agreement will be revised at frequency 3 years once and latest agreement is still under reviewed. Details of CA has been documented as following.</p> <ol style="list-style-type: none"> 1. MAPA/NUPW Agreement on the wages of harvesters, harvesting kanganyies, loaders and "other loaders" on oil palm estates, 2019 2. MAPA/NUPW Agreement Palm Oil Mill Employees` Agreement, 2019 3. MAPA/NUPW Filed and other general employees and fringe benefits agreement, 2019. <p>Although these old agreements were expired in Dec 2021, the current adjustment to suit minimum wage of RM1,500 per month per employee was ensured by management for living wage sufficient to meet basic needs.</p> <p>Documentations of pay available in the form of Monthly Pay Slip and conditions as per Work Agreement Contract as per sample sighted as follow.</p> <table border="1" data-bbox="1032 970 1525 1375"> <thead> <tr> <th>No.</th> <th>Workers ID</th> <th>Designation</th> </tr> </thead> <tbody> <tr><td>1.</td><td>1386</td><td>Harvester</td></tr> <tr><td>2.</td><td>1628</td><td>Harvester</td></tr> <tr><td>3.</td><td>1240</td><td>Watchmen</td></tr> <tr><td>4.</td><td>1501</td><td>LF Collector</td></tr> <tr><td>5.</td><td>1579</td><td>LF Collector</td></tr> <tr><td>6.</td><td>1785</td><td>Sprayer</td></tr> <tr><td>7.</td><td>2520</td><td>Manurer</td></tr> <tr><td>8.</td><td>2738</td><td>Sprayer</td></tr> <tr><td>9.</td><td>1427</td><td>Sprayer</td></tr> <tr><td>10.</td><td>1649</td><td>Sprayer</td></tr> <tr><td>11.</td><td>2558</td><td>Driver</td></tr> </tbody> </table>	No.	Workers ID	Designation	1.	1386	Harvester	2.	1628	Harvester	3.	1240	Watchmen	4.	1501	LF Collector	5.	1579	LF Collector	6.	1785	Sprayer	7.	2520	Manurer	8.	2738	Sprayer	9.	1427	Sprayer	10.	1649	Sprayer	11.	2558	Driver	
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Criterion / Indicator		Assessment Findings			Compliance
		12.	2501	Mandore	
		13.	1542	Harvester	
		<p><u>Major Non-conformance (Major NC)</u> Salary payment for field workers is not according to Minimum Wages Order 2022. Based on sample of payslip from different types of works, gender and origin countries in Segaria Estate, it has been found that salary payment is not according to Minimum Wages Order 2022 which is RM57.69/day</p> <ol style="list-style-type: none"> 1. 2738, Basic Wages 465.11, Work: 24 days, Ave Wage: MYR27.36. 2. 1427, Basic Wages: 993.00, Work: 25 days, Ave Wage: MYR39.72. 3. 1649, Basic Wages: 431.86, Work: 24 days, Ave Wage: MYR25.40. 4. 1785, Basic Wages 985.64, Work: 23 days, Ave Wage: MYR42.85. 			
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 -	<p>To ensure employees of contractors are paid based on legal or industry minimum standards, the management requests payslips from the contractors. Payslips of employees from several contractors of the sampled estate available for verification. Generally, the pays were found to be meeting the minimum standard requirements. Document review of sample contractor’s payslip at Segaria Estate for February 2023 is according to the requirement, which is applicable includes minimum wages and SOCSO contributions.</p>			Complied
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.	<p>Segaria Estate registered all the recruited workers in the Labour Registration Record where personal details such as name, nationality, next of kin, education standard, date of employed, job description, wage rate, and date of birth etc. were stated in the registration card.</p>			Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.4.5.6	<p>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.</p> <p>- Major compliance -</p>	<p>BPB Group established New Recruitment Procedure, Rev:01, effectively on 02/2020. Foreign Workers Procedure, Rev.: 01, Issued no.: 01, dated 01/2016. The procedure is to ensure workers recruitment to identified workers that fit the needs on the jobs suit with Segaria Estate operations.</p> <p>BPB Group established Foreign Workers Procedure, Rev:01, Issue: Jan 2016, dated 25/01/2016. The procedure is to ensure estate/mill follow the correct steps in employment of foreign workers as stipulated by the government agencies/state government.</p> <p>Review on the employment contracts sighted available for samples of own and contractor’s employees, confirmed 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, overtime and etc.</p> <p>Onsite interview with workers informed they kept a copy of the employment contracts were acknowledged.</p>	Complied
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p> <p>- Major compliance -</p>	<p>Segaria Estate maintained current practice on time recording by using Field & General Workers Daily Attendance Record and Oil Palm Harvester Reception Data sheet to record the attendance, tonnage, overtime and etc. for each of individual workers.</p>	Complied
4.4.5.8	<p>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.</p> <p>- Major compliance -</p>	<p>Segaria Estate maintained current practices on time recording by using Field & General Workers Daily Attendance Record and Oil Palm Harvester Reception Data sheet.</p> <p>Onsite interview with sampled workers informed working time and break time is according to employment contract. Overtime offered to workers</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		is voluntarily upon mutually agreement between management and workers.	
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	Segaria Estate maintained current practices on time recording by using Field & General Workers Daily Attendance Record and Oil Palm Harvester Reception Data sheet. Documented payslip distributed to all workers on the day of payment. Wages and overtime were paid according to the 'Field & General Workers Daily Attendance and Oil Palm Harvester Reception Data'. Total hours of overtime and daily attendance has recorded on the time sheet. Review on the sampled workers' payslip, the paid of task rate and overtime offer are state as according to the attendance sheet. Management kept copy the payslip and presented to auditor for review from the system. The sampled of workers' employment contract as the indicator 4.4.5.3 above.	Complied
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions. - Minor compliance -	BPB Group through Segaria Business Unit management provided free medical facilities to all the workers and dependents in Segaria Estate. Community Learning Centre available for the educational purpose especially to foreign workers' children from six (6) years old until 17 years old. Free treated water and electricity supplied to each of workers' housing units.	Complied
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 -	BPB Group provide to workers are provided with free housing facilities which includes potable water and electricity. Housing inspection by the medical assistants was also carried out on weekly basis which criteria is mainly focusing on cleanliness and safety. Records of inspection were well maintained for verification.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Onsite visit at workers housing observed the amenities available include playground, football field, church, mosque, sundry shop and crèche were available at Segaria Estate.</p> <p>The workers quarters have adequate clean water supply by estate management, the management also done the analysis to ensure water was safe for domestic use.</p> <p>Document review on the workers housing inspection latest conducted on 04/02/2023, 11/02/2023, 12/02/2023 and 19/02/2023.</p> <p>Document review on the Visiting Medical Officer (VMO) visit report dated 04/02/2023 and 11/02/2023 by Dr. Nasib Sakiman; MMC #27286.</p> <p>Immediate action was taken by estate’s person in-charge to be responded to the VMO upon next coming visit.</p>	
4.4.5.12	<p>The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- Major compliance -</p>	<p>BPB Group maintained the current Anti-Harassment Policy Statement signed by CEO dated 01/03/2022.</p> <p>Objective of the policy is strictly prohibited harassment, as well as inappropriate or unwelcome behavior that, if left unchecked, could become severe or pervasive as to constitute harassment.</p> <p>Segaria Estate established Sexual Harassment Complaint Procedure for estate level which includes the method of complaint as follow.</p> <ol style="list-style-type: none"> 1. Phone call (089-70xxxx) 2. Request and Response Form 3. Official complaints to Assistant Manager or Manager 4. Complaint box 5. Worker’s representative 6. Website Boustead Plantation, E-Adu 7. Official letter to General Director of Labour Department 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Management established few social practices regarding human rights that provide guidelines to prevent all forms of sexual harassment and violence at the workplace under Social Policies in the company's website: https://www.bousteadplantations.com.my/sustainability-approach-policies/.</p> <p>Consultation made on-site with stakeholders confirmed no sexual harassment and violence occurred in the workplace.</p> <p>Document review, no sexual harassment complaints or grievance lodged as at audit.</p>	
4.4.5.13	<p>The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>	<p>Segaria Estate established 'Persatuan Pekerja Segaria (PPS)'. Document review on minutes of meeting sighted, PPS conducted on 06/12/2022. The agenda of meeting discuss includes dissolves of previous committee, elect new committee and logistic matters.</p> <p>Management established few social practices regarding human rights that respect the right of all employees to form or join union and allow workers own representatives to facilitate collective bargaining as the Freedom of Association Policy; Dated: 2/12/2019 under Social Policies: https://www.bousteadplantations.com.my/sustainability-approach-policies/.</p>	Complied
4.4.5.14	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children and young persons is acceptable on family farms, under adult supervision, and when not interfering with their education. They shall not be exposed to hazardous working conditions.</p> <p>- Major compliance -</p>	<p>Management established few social practices regarding human rights that prevent employment of children and young persons as the Children Employment and Minimum Age Policy; Dated: 2/12/2019: https://www.bousteadplantations.com.my/sustainability-approach-policies/.</p> <p>Review of workers particulars and consultation with stakeholders confirmed that the company adopted the Children and Young Persons (Employment) Act 1966 and ILO Convention 138 (1973) Article 1-3. No</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance																																																									
		workers less than 16 years old will be recruited and less than 18 years old for hazardous work.																																																										
Criterion 4.4.6: Training and competency																																																												
4.4.6.1	<p>All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.</p> <p>- Major compliance -</p>	<p>Segaria Estate had trained their staff, workers and records of training were kept in the MSPO training file. The records included information on the title of the training, name and signature of the attendees, name of the trainer, time and venue. Among others the training held by the units as listed below.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Estate - Subject</th> <th>Date</th> </tr> </thead> <tbody> <tr><td>1</td><td>CPR procedure</td><td>11/03/2022</td></tr> <tr><td>2</td><td>Compound hygiene & disease</td><td>22/12/2022</td></tr> <tr><td>3</td><td>RB prohibition/ IPM Management</td><td>28/04/2022</td></tr> <tr><td>4</td><td>Chemical handling/ management</td><td>17/01/2023</td></tr> <tr><td>8</td><td>Recycling & Environment Guide</td><td>31/10/2022</td></tr> <tr><td>9</td><td>RSPO/ MSPO Supply Chain SCCS</td><td>10/01/2023</td></tr> <tr><td>10</td><td>Fertilizer application - calibration</td><td>05/11/2022</td></tr> <tr><td>11</td><td>Buffer zone maintenance</td><td>23/09/2022</td></tr> <tr><td>12</td><td>Oil trap- procedure /maintenance</td><td>30/10/2022</td></tr> <tr><td>13</td><td>SW/ Waste Management</td><td>07/12/2022</td></tr> <tr><td>14</td><td>Triple rinsing – guidelines</td><td>16/11/2022</td></tr> <tr><td>15</td><td>Pay Slip/ Employment Contract</td><td>11/07/2022</td></tr> <tr><td>16</td><td>Fertilizer application</td><td>26/11/2022</td></tr> <tr><td>17</td><td>Rat baiting - SOP</td><td>01/09/2022</td></tr> <tr><td>18</td><td>Harvesting FFB/ FFB Quality</td><td>09/01/2023</td></tr> <tr><td>19</td><td>Zero Burning/ Line site</td><td>07/12/2022</td></tr> <tr><td>20</td><td>PPE adherence</td><td>07/12/2022</td></tr> <tr><td>21</td><td>Pesticides handling - SOP</td><td>12/11/2022</td></tr> </tbody> </table>	No.	Estate - Subject	Date	1	CPR procedure	11/03/2022	2	Compound hygiene & disease	22/12/2022	3	RB prohibition/ IPM Management	28/04/2022	4	Chemical handling/ management	17/01/2023	8	Recycling & Environment Guide	31/10/2022	9	RSPO/ MSPO Supply Chain SCCS	10/01/2023	10	Fertilizer application - calibration	05/11/2022	11	Buffer zone maintenance	23/09/2022	12	Oil trap- procedure /maintenance	30/10/2022	13	SW/ Waste Management	07/12/2022	14	Triple rinsing – guidelines	16/11/2022	15	Pay Slip/ Employment Contract	11/07/2022	16	Fertilizer application	26/11/2022	17	Rat baiting - SOP	01/09/2022	18	Harvesting FFB/ FFB Quality	09/01/2023	19	Zero Burning/ Line site	07/12/2022	20	PPE adherence	07/12/2022	21	Pesticides handling - SOP	12/11/2022	Complied
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Criterion / Indicator		Assessment Findings			Compliance	
		22	Harvesting/ Pruning SOP	16/11/2022		
		23	Workplace inspection ESH	15/02/2022		
		24	LF Collection SOP	13/11/2022		
		25	Tractor/ Vehicles safe driving	24/09/2022		
		27	Replanting/ Nursery guidelines	05/07/2022		
		28	Spraying guidelines	17/01/2023		
		29	Policies briefing - RSPO & MSPO	16/01/2023		
		30	ERP Fire/ Flood/ Accident	08/2/2023		
		31	Pregnant Employees Rights	13/02/2023		
		32	RTE/ HCV/ Buffer Zone - Guide	07/12/2022		
		33	Work ethics/ Gender/ Harassment	13/09/2022		
		34	Basic Life Support/ 1st Aid	14/02/2023		
		35	COVID-19 guidelines/ awareness	04/04/2022		
		36	First Aid Management - PPE	06/12/2022		
		37	Operations Gen set	22/12/2022		
		38	Health Awareness KKM	18/10/2022		
4.4.6.2	<p>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.</p> <p>- Major compliance -</p>	<p>Similar methods for identifying the training needs are used in all the Estate. The details of the training needs include categories of:</p> <ol style="list-style-type: none"> 1. Job descriptions 2. Sections 3. Employees' group. <p>Included in this program are subjects related to:</p> <ol style="list-style-type: none"> 1. Environment e.g. Environmental, safety & health policy 2. Scheduled waste management 3. Environmental responsibility, HCV & biodiversity training 4. Field activities/operations 				Complied

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Criterion / Indicator		Assessment Findings	Compliance
		5. Equipment handling, vehicles maintenance etc.	
4.4.6.3	A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure. - Minor compliance -	The training program for 2023 covering all aspects of the MSPO indicators and other essential operations activities has been established. Training identification matrix has been established with target months for of implementation. The training program/subjects among others includes the following.	Complied

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Criterion / Indicator		Assessment Findings				Compliance	
		No.	Estate - Subjects	Month			
				1-4	5-8	9-12	
		1	ESH Legal & Other requirements	/	/	/	
		2	Slope/ Buffer Zone management	/	-	/	
		3	ER Plan (Chemical spill, Fire. Lightning)	/	-	/	
		4	First Aid/ CPR	/	-	/	
		5	Scheduled waste management	/	-	/	
		6	Fire Drill	-	/	-	
		7	Store management	/	-	-	
		8	Chemical Handlings	/	/	-	
		9	RSPO MSPO Policy Training	/	-	/	
		10	Rat Baiting	/	/	-	
		11	Effective workplace inspection	/	/	/	
		12	Workshop Management	-	/	/	
		13	GAP training/ SW	/	/	/	
		14	Induction Program – New Worker	/	-	-	
		15	IPM Management	/	-	-	
		16	FFB Grading	/	-	/	
		17	EFB application	-	-	/	
		18	BPB Policies	/	-	-	
		19	Gen-set Operations.	-	-	/	
		20	Oil trap management	/	-	/	
		21	Weighbridge Operations	/	-	-	
		22	Maintenance of spraying equipment	-	/	-	
		23	HCV Biodiversity understanding	-	-	/	
		24	Fertilizer application	/	-	/	
		25	Water treatment management	-	/	-	
26	Estate Activities/ Mill Work stations	/	/	/			

Criterion / Indicator		Assessment Findings				Compliance
		27	Triple rinsing/ Recycling guidelines	-	/	-
		28	Safe driving techniques	/	-	/
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services						
Criterion 4.5.1: Environmental Management Plan						
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. - Major compliance -	BPB Group maintained the current Environmental and Biodiversity Policy signed by CEO on 1207/2021. The policy describes company commitment to protecting the environment and conserving biodiversity through sustainable development. This is policy is prominently displayed in the office along with other Company's Policies.				Complied
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 -	a) BPB Group maintained the current Environmental and Biodiversity Policy signed by CEO on 1207/2021. The objectives of the environmental management plan among others include the following. 1. Implement and comply to all prevailing statutory environmental laws 2. Plantation development emphasizing zero burning practices. 3. Compliance of DOE- to minimize pollution of land/ water/ air. 4. To control and practice GAP systems in both mineral/ peat soils. 5. Identification of HCV and preserving riparian zones. b) Environmental Impact Assessment 2023 updated on January 2023 compiled internally by the estate management and BPB HQ SSD Department. The analysis covered the following activities.				Complied

Criterion / Indicator		Assessment Findings				Compliance																
		<ol style="list-style-type: none"> 1. Harvesting/ weeding/ fertilizer application 2. Mulching/ road upkeep/ ramp 3. Workshop/ chemical store 4. Lubricant store/ fertilizer store 5. Impact of field operations activities towards environmental 6. Identification of riparian zone 7. All the relevant positive/ negative impact and mitigation plan 																				
4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p> <p>- Major compliance -</p>	<p>Environmental Impact Assessment 2023 updated on January 2023 includes details of mitigation of the negative impacts. They are summarized as below.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Activities</th> <th>Impacts</th> <th>Mitigation plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Harvesting</td> <td>Promote positive impact to soil structure through biomass frond & EFB mulching.</td> <td>Practice proper frond stacking. EFB applied to improve nutrient & biomass</td> </tr> <tr> <td>2</td> <td>Weeding</td> <td>Negative impact as polluting the soil with usage of chemicals.</td> <td>Dosage of chemicals is monitored & calibrated. Cattle integration introduced to reduce reliance of chemical.</td> </tr> <tr> <td>3</td> <td>Manuring</td> <td>Over usage of chemical & fertilizer affecting soil toxicity causing leaching/ wash off.</td> <td>Identify buffer zones and to prevent leaching of fertilizer and chemicals. Application along frond stacking rows.</td> </tr> </tbody> </table>				No.	Activities	Impacts	Mitigation plan	1	Harvesting	Promote positive impact to soil structure through biomass frond & EFB mulching.	Practice proper frond stacking. EFB applied to improve nutrient & biomass	2	Weeding	Negative impact as polluting the soil with usage of chemicals.	Dosage of chemicals is monitored & calibrated. Cattle integration introduced to reduce reliance of chemical.	3	Manuring	Over usage of chemical & fertilizer affecting soil toxicity causing leaching/ wash off.	Identify buffer zones and to prevent leaching of fertilizer and chemicals. Application along frond stacking rows.	Complied
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Criterion / Indicator		Assessment Findings				Compliance	
		4	Road upkeep	Damages through grading and chambering	Water collected at drain pits is collected to maximize moisture of nearest palm.		
		5	Loading Bay	FFB transportation of lorries in minimizing leakages of fuel	Education to drivers and monitoring of vehicles movements.		
		6	Workshop	Spillage to prevent pollution	Availability of spill kit and health surveillance for welding personnel.		
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Environmental Impact Assessment 2023 updated on January 2023 includes details of mitigation of the negative impacts. In addition, IPM management intensified in the fields planting of beneficial plants to reduce reliance of chemicals on events of pest and disease.				Complied	
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives. - Major compliance -	Segaria Estate implement the training program for 2023 in relation to the policy and objectives of the environmental management and improvement plans has been established with subject listed below.				Complied	
		No.		Month			
				1-4	5-8	9-12	
		1	ESH Legal & Other requirements		/	/	/
		2	Slope/ Buffer Zone management		/	-	/
		3	Scheduled waste management		/	-	/
		4	Store management		/	-	-
		5	Chemical Handlings		/	/	-
		6	RSPO MSPO Policy Training		/	-	/
		7	Workshop Management		-	/	/
		8	GAP training/ SW		/	/	/
		9	EFB application		-	-	/
		10	Oil trap management		/	-	/

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Criterion / Indicator		Assessment Findings					Compliance																								
		11	Maintenance of spraying equipment	-	/	-																									
		12	HCV Biodiversity understanding	-	-	/																									
		13	Fertilizer application	/	-	/																									
		14	Water treatment management	-	/	-																									
		15	Triple rinsing/ Recycling guidelines	-	/	-																									
4.5.1.6	<p>Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.</p> <p>- Major compliance -</p>	<p>Segaria Estate discussed environmental issues as part of agenda incorporated into safety & health meeting.</p> <p>The forum used in quarterly OSH meeting and annual management review meeting. The latter emphasized more on issues on water management plan, electricity use, diesel consumption, waste management, SIA plan, renewable energy, aspect/impact.</p> <p>Minutes were sighted and adequately includes agenda of environmental issues.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 5%;">1.</td> <td style="width: 45%;">OSH meeting</td> <td style="width: 10%;">1st</td> <td style="width: 10%;">2nd</td> <td style="width: 10%;">3rd</td> <td style="width: 10%;">4th</td> </tr> <tr> <td></td> <td></td> <td>21/12/22</td> <td>21/09/22</td> <td>22/06/22</td> <td>09/03/22</td> </tr> <tr> <td>2.</td> <td>Management Review Meeting</td> <td colspan="2">1st</td> <td colspan="2">2nd</td> </tr> <tr> <td></td> <td></td> <td colspan="2">18/11/21</td> <td colspan="2">15/01/22</td> </tr> </table>					1.	OSH meeting	1st	2nd	3rd	4th			21/12/22	21/09/22	22/06/22	09/03/22	2.	Management Review Meeting	1st		2nd				18/11/21		15/01/22		Complied
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		18/11/21		15/01/22																											
Criterion 4.5.2: Efficiency of energy use and use of renewable energy																															
4.5.2.1	<p>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.</p> <p>- Major compliance -</p>	<p>Environmental Impact Assessment 2023 updated on January 2023 includes details of mitigation of the negative impacts.</p> <p>The plan includes with improving the efficiency of the use of fossil fuels and incorporated into the Environmental Aspect and Impact report 2023.</p> <p>The document was reviewed/updated on Jan 2023. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 5%;">No.</td> <td style="width: 20%;">Target</td> <td style="width: 30%;">Objective</td> <td style="width: 45%;">Action plan</td> </tr> </table>					No.	Target	Objective	Action plan	Complied																				
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Criterion / Indicator		Assessment Findings				Compliance																																				
		1	Backhoe tractor	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel																																					
		2	Van/ Supervisory vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.																																					
		3	Electrical supply	To reduce reliance on gen-sets for power supply	To run steam turbine during non-processing min 2 hours																																					
		4	Electrical supply	Reduce electricity usage	Use time switches and daylight sensors for outside lighting																																					
		5	Electrical supply	Reduce electricity usage	Educate employees on power saving via inspection and training.																																					
<p>The utilization of fossil fuel in 2022 is being monitored with records ratio diesel L/FFB mt shown below. (Baseline is 5.70 L/mt FFB)</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Month</th> <th>Ratio</th> <th>No.</th> <th>Month</th> <th>Ratio</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Jan</td> <td>5.45</td> <td>7</td> <td>July</td> <td>7.53</td> </tr> <tr> <td>2</td> <td>Feb</td> <td>6.79</td> <td>8</td> <td>Aug</td> <td>6.09</td> </tr> <tr> <td>3</td> <td>Mac</td> <td>6.18</td> <td>9</td> <td>Sep</td> <td>5.58</td> </tr> <tr> <td>4</td> <td>Apr</td> <td>6.09</td> <td>10</td> <td>Oct</td> <td>5.82</td> </tr> <tr> <td>5</td> <td>May</td> <td>6.55</td> <td>11</td> <td>Nov</td> <td>6.88</td> </tr> </tbody> </table>							No.	Month	Ratio	No.	Month	Ratio	1	Jan	5.45	7	July	7.53	2	Feb	6.79	8	Aug	6.09	3	Mac	6.18	9	Sep	5.58	4	Apr	6.09	10	Oct	5.82	5	May	6.55	11	Nov	6.88
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Criterion / Indicator		Assessment Findings						Compliance
		6	Jun	7.18	12	Dec	6.29	
						Total	426,623	
		<p>Segaria Estate records and monitors the diesel utilization over the running hours of gen-set and other vehicles running. Performance variation in view of several factors i.e.</p> <ol style="list-style-type: none"> 1. Infrastructure of Estate 2. Community size/ no of gen-sets 3. No. of vehicles/ age of machine 4. Weather interference/ crop production volume 5. Crop diversion to other mill due to breakdown. <p>There is no opportunity for Segaria Estate to capitalize the utilization of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.</p>						
4.5.2.2	<p>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.</p> <p>- Major compliance -</p>	<p>Segaria Estate estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel in all transport and machinery operations was available in the estate yearly budgets.</p>						Complied
4.5.2.3	<p>The use of renewable energy should be applied where possible.</p> <p>- Minor compliance -</p>	<p>There was no opportunity to use renewable energy (shell/fibre/EFB) in Segaria Estate since its only applicable for mill operations.</p>						Complied
Criterion 4.5.3: Waste management and disposal								

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Criterion / Indicator		Assessment Findings					Compliance
4.5.3.1	<p>All waste products and sources of pollution shall be identified and documented.</p> <p>- Major compliance -</p>	<p>Environmental Impact Assessment 2023 updated on January 2023 includes details of mitigation of the negative impacts.</p> <p>All waste products and sources of pollution has been identified and documented in the Waste Management Plan for 2023.</p> <p>Details as follows:</p>					Complied
		No.	Activities	Source	Waste/Pollution	Affected	
		1	General store	Petrol oil, lubricant Chemical	Spillage & contamination	Land, water	
		2	Scheduled Waste store	Scheduled waste	All type of Scheduled Waste	Environmental	
		3	Office	Domestic/ office waste	Paper plastic	Land, water	
				Toilet & kitchen	Sewage		
		4	Workshop	Used oil & grease	Spillage	Recycled	
				Metal waste	Wastage		
Oil drum/ tank							
5	Labour line	Domestic waste	Solid waste	Land, water			
		Toilet/ kitchen waste	sewage				
6	Field activities	Operation waste	Palm frond, FFB stalk	Land /water			
4.5.3.2	<p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <p>a) Identifying and monitoring sources of waste and pollution</p> <p>b) Improving the efficiency of resource utilization and</p>	<p>a) Segaria Estate established the Waste and Pollution Management Plan 2023 as shown below. Identifying and monitoring sources of waste and pollution as follow.</p>					Complied
		No.	Activities	Source	Waste/ Pollution	Affected	

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Criterion / Indicator		Assessment Findings					Compliance
	recycling of potential wastes as nutrients or converting them into value-added by-products - Major compliance -	1	General store	Petrol oil, lubricant Chemical	Spillage & contamination	Land, water	
		2	Scheduled Waste store	Scheduled waste	All type of SW	Environmental	
		3	Office	Domestic/ office waste	Paper plastic	Land, water	
				Toilet & kitchen	Sewage		
		4	Workshop	Used oil & grease	Spillage	Recycled	
				Metal waste	Wastage		
				Oil drum/ tank			
		5	Labour line	Domestic waste	Solid waste	Land, water	
				Toilet/ kitchen waste	Sewage		
		b) Segaria Estate identify the efficiency of source of resource for utilization and recycling of potential wastes as nutrients or converting them into value-added by-products as follow.					
c)							
		No.	Activities	Source	Prevention	Action Plan	
		1	General store	Petrol oil, lubricant Chemical	Keep items in designated area i.e. Bund 110% of capacity	Establish recovery procedure - accidental	

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Criterion / Indicator		Assessment Findings				Compliance
					spillage. Kit available	
		2	Scheduled Waste store	Scheduled waste	Comply to EQA requirement	Dispose as SW & maintain record.
		3	Office	Domestic/ office waste Toilet & kitchen	Implement recycling of waste Provide bins	Continuous education on environmental issues and program.
		4	Workshop	Used oil & grease	Display signboards & provide litter bins	
				Metal waste Oil drum/ tank	Collect discarded materials for recycling	Provide training on recycling
		5	Labour line	Domestic waste	Display signboards & provide litter bins	Provide training on recycling
		5	Labour line	Toilet & kitchen waste	Ensure no accidental spillage	Cease using facilities in event of non-functional
4.5.3.3	The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and	BPB Group maintained the current SOP on Scheduled Waste Management dated June 2017.				Complied

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Criterion / Indicator		Assessment Findings	Compliance																																															
	<p>safe handling, storage and disposal.</p> <p>- Major compliance -</p>	<p>The inventory of the waste generated is recorded using the "E-SWISS" inventory online system.</p> <p>Document review of all scheduled waste generated disposed to Lagenda Bumimas Sdn Bhd with license no. 003440 valid until 30/4/2023.</p> <p>Clinical Waste SW 404 generated from estate' clinic will dispose to using Medicare Lab Tawau through Sedafiat Sdn Bhd.</p> <p>Scheduled waste disposal details as follow.</p> <table border="1"> <thead> <tr> <th rowspan="2">No.</th> <th rowspan="2">Date</th> <th colspan="7">Metric Ton</th> </tr> <tr> <th>SW 410</th> <th>SW 306</th> <th>SW 102</th> <th>SW 109</th> <th>SW 409</th> <th>SW 305</th> <th>SW 110</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>13/02/2023</td> <td>0.412</td> <td>0.237</td> <td>0.061</td> <td>0.006</td> <td>0.070</td> <td>0.245</td> <td>-</td> </tr> <tr> <td>2</td> <td>27/07/2022</td> <td>0.107</td> <td>0.100</td> <td>0.062</td> <td>-</td> <td>0.090</td> <td>0.600</td> <td>0.025</td> </tr> </tbody> </table> <p>SW 404 disposal details as follows.</p> <table border="1"> <thead> <tr> <th rowspan="2">No.</th> <th rowspan="2">SW 404</th> <th colspan="3">Metric Ton</th> </tr> <tr> <th>05/01/2023</th> <th>06/07/2022</th> <th>03/03/2022</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>SW 404</td> <td>0.006</td> <td>0.0065</td> <td>0.0015</td> </tr> </tbody> </table>	No.	Date	Metric Ton							SW 410	SW 306	SW 102	SW 109	SW 409	SW 305	SW 110	1	13/02/2023	0.412	0.237	0.061	0.006	0.070	0.245	-	2	27/07/2022	0.107	0.100	0.062	-	0.090	0.600	0.025	No.	SW 404	Metric Ton			05/01/2023	06/07/2022	03/03/2022	1	SW 404	0.006	0.0065	0.0015	
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4.5.3.4	<p>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.</p> <p>- Major compliance -</p>	<p>BPB Group maintained the current SOP on Scheduled Waste Management dated June 2017. The procedure describes guideline and practice for handling empty pesticides containers are as follows.</p> <ol style="list-style-type: none"> All class 2 and above containers are tripled rinsed, and holes punctured at the bottom only if the waste generator is to dispose as non-scheduled waste. Containers to be disposed as scheduled waste need not go the triple rinsing and hole punctured process. <p>These guidelines are based on Department of Agriculture (DOA) with ref. No.: 91/120/038/014 dated 7/11/2002.</p>	Complied																																															

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Criterion / Indicator		Assessment Findings	Compliance						
		<p>The inventory of the waste generated is recorded using the "E-SWISS" inventory online system.</p> <p>Document review of all scheduled waste generated disposed to Lagenda Bumimas Sdn Bhd with license no.003440 valid until 30/4/2023.</p> <p>Clinical Waste SW 404 generated from estate' clinic will disposed to using Medicare Lab Tawau through Sedafiat Sdn Bhd.</p> <p>Visit to Segaria Estate' waste store observed empty pesticide containers were collected with proper storage. Mainly containers are tripled rinsed and holes punctured at the container base.</p>							
4.5.3.5	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p>- Minor compliance -</p>	<p>BPB Group maintained the current SOP on Scheduled Waste Management dated June 2017.</p> <p>Onsite visit to the respective landfill area will be verified in the forthcoming site audit. All domestic waste generated from workers quarters was disposed in respective land fill for the estate. The landfills were located away i.e. about 1km from water sources.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%;">Estate</th> <th style="width: 20%;">Site</th> <th style="width: 60%;">Remarks</th> </tr> </thead> <tbody> <tr> <td>Segaria</td> <td>PM99B</td> <td>Collection two or three times per week</td> </tr> </tbody> </table>	Estate	Site	Remarks	Segaria	PM99B	Collection two or three times per week	Complied
Estate	Site	Remarks							
Segaria	PM99B	Collection two or three times per week							
Criterion 4.5.4: Reduction of pollution and emission									
4.5.4.1	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.</p> <p>- Major compliance -</p>	<p>Environmental Impact Assessment 2023 updated on January 2023 includes details of mitigation of the negative impacts.</p> <p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate/ soot emissions and effluent.</p> <p>Environmental Aspect and Impact (EAI) updated on January 2023 covers estate activities/ operation.</p>	Complied						

Criterion / Indicator		Assessment Findings				Compliance																
		<p>Pollution Identification Environmental Improvement Action Plan established is to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental aspect for estate operations as follow.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Environmental Aspect</th> <th colspan="2">Source</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td colspan="2">Air emissions - from vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).</td> </tr> <tr> <td>2</td> <td>Water</td> <td colspan="2">Water discharges - Cleaning water/ run-off/process station, chemical washings, water waste from line site</td> </tr> <tr> <td>3</td> <td>Land</td> <td colspan="2">Land - Scheduled waste, domestic waste and industrial/ process waste. Clinical wastes – generated from clinics.</td> </tr> </tbody> </table> <p>1. Scheduled waste generated disposed to Lagenda Bumimas Sdn Bhd with license no.003440 valid until 30/4/2023. 2. Full compliance to zero burning practices.</p>				No.	Environmental Aspect	Source		1	Air	Air emissions - from vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).		2	Water	Water discharges - Cleaning water/ run-off/process station, chemical washings, water waste from line site		3	Land	Land - Scheduled waste, domestic waste and industrial/ process waste. Clinical wastes – generated from clinics.		
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4.5.4.2	<p>An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p> <p>- Major compliance -</p>	<p>Segaria Estate established Waste and Pollution Management Plan 2023 as shown below. The PIC and time frame was also shown in the management plan.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Activities</th> <th>Source</th> <th>Prevention</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td rowspan="2">General store</td> <td>Petrol oil, lubricant</td> <td rowspan="2">Keep items in designated area i.e. Bund 110% of capacity</td> <td rowspan="2">Establish recovery procedure - accidental spillage. Kit available</td> </tr> <tr> <td></td> <td>Chemical</td> </tr> </tbody> </table>				No.	Activities	Source	Prevention	Action Plan	1	General store	Petrol oil, lubricant	Keep items in designated area i.e. Bund 110% of capacity	Establish recovery procedure - accidental spillage. Kit available		Chemical	Complied				
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Criterion / Indicator		Assessment Findings				Compliance	
		2	Scheduled Waste store	Scheduled waste	Comply to EQA requirement	Dispose as SW & maintain record.	
		3	Office	Domestic/ office waste	Implement recycling of waste Provide bins	Continuous education on environmental issues and program.	
				Toilet & kitchen			
		4	Workshop	Used oil & grease	Display signboards & provide litter bins	Provide training on recycling	
				Metal waste Oil drum/ tank	Collect discarded materials for recycling		
		5	Labour line	Domestic waste	Display signboards & provide litter bins	Provide training on recycling	
6	Labour line	Toilet & kitchen waste	Ensure no accidental spillage	Cease using facilities in event of non-functional			
Criterion 4.5.5: Natural water resources							
4.5.5.1	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:	a) Segaria Estate established Water Management Plan for Year 2023 updated on 15/02/2023. b) Review on the plan has identified the area of concern toward managing water from estate as follow.				Complied	

Criterion / Indicator	Assessment Findings	Compliance																
<p>a. Assessment of water usage and sources of supply.</p> <p>b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities.</p> <p>c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</p> <p>d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</p> <p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p>- Major compliance -</p>	<p>1. Riparian buffer zone / water quality monitoring</p> <p>2. Access of clean water to workers</p> <p>3. Renewability of water source / Rainwater harvest</p> <table border="1" data-bbox="1072 552 1868 1139"> <thead> <tr> <th data-bbox="1072 552 1133 587">No.</th> <th colspan="3" data-bbox="1133 552 1868 587">Contingency plan during water shortage</th> </tr> <tr> <th data-bbox="1072 587 1133 619"></th> <th data-bbox="1133 587 1330 619">Area/ incident</th> <th data-bbox="1330 587 1733 619">Action steps</th> <th data-bbox="1733 587 1868 619">PIC</th> </tr> </thead> <tbody> <tr> <td data-bbox="1072 619 1133 879">1</td> <td data-bbox="1133 619 1330 879">Water shortage/ prolonged dry season</td> <td data-bbox="1330 619 1733 879">To obtain water from Mill catchment To train/ educate staff/ workers to conserve water To seek assistance from Group Estate To obtain treated water supply from mill’s WTP</td> <td data-bbox="1733 619 1868 879">Assistant Manager</td> </tr> <tr> <td data-bbox="1072 879 1133 1139">2</td> <td data-bbox="1133 879 1330 1139">Severe water pollution/ contamination</td> <td data-bbox="1330 879 1733 1139">To obtain water from Mill catchment To train/ educate staff/ workers to conserve water To seek assistance from Group Estate To obtain treated water supply from mill’s WTP</td> <td data-bbox="1733 879 1868 1139">Assistant Manager</td> </tr> </tbody> </table> <p>c) Segaria Estate adopted the current BPB Group ‘Polisi Perlindungan Cerun & Zon Penampun Sungai’ signed by CEO dated 02/12/2019. to maintain the buffer by restricting agrochemical application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones.</p>	No.	Contingency plan during water shortage				Area/ incident	Action steps	PIC	1	Water shortage/ prolonged dry season	To obtain water from Mill catchment To train/ educate staff/ workers to conserve water To seek assistance from Group Estate To obtain treated water supply from mill’s WTP	Assistant Manager	2	Severe water pollution/ contamination	To obtain water from Mill catchment To train/ educate staff/ workers to conserve water To seek assistance from Group Estate To obtain treated water supply from mill’s WTP	Assistant Manager	
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Criterion / Indicator		Assessment Findings	Compliance																								
		<p>d) Segaria Estate continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The buffer zones established are as follows:</p> <table border="1"> <thead> <tr> <th>No.</th> <th>River width</th> <th>Buffer zone</th> <th>No.</th> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>> 40 meters</td> <td>50 meters</td> <td>4</td> <td>5 - 10 meters</td> <td>10 meters</td> </tr> <tr> <td>2.</td> <td>20 - 40 meters</td> <td>40 meters</td> <td>5</td> <td>< 5 meters</td> <td>5 meters</td> </tr> <tr> <td>3.</td> <td>10 - 20 meters</td> <td>20 meters</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table> <p>e) The compliance will be further verified in the forthcoming site audit. Samples are taken from the Estate for detection of any pollution arising from the mill and Estate activities. Water samples from the intake point are taken for phosphate and nitrate analysis for detection of fertilizer application effect to the water courses. Among others management plan taken:</p> <ol style="list-style-type: none"> 1. Regular inspection at buffer/ HCV areas 2. Monitor water from surrounding areas 3. Track, measure and report all activities around river 4. Train and educate workers. <p>f) There is no bore well available in the Estate.</p>	No.	River width	Buffer zone	No.	River width	Buffer zone	1.	> 40 meters	50 meters	4	5 - 10 meters	10 meters	2.	20 - 40 meters	40 meters	5	< 5 meters	5 meters	3.	10 - 20 meters	20 meters	-	-	-	
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4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance -	Segaria Estate management informed during interview at onsite visit that there was no construction of bunds, weirs and dams across main rivers or waterways passing through an estate.	Complied																								
4.5.5.3	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles).	BPB Group established Agriculture Procedures as guidelines for estate operation has describes common practices field visit on the forthcoming onsite audit to verify practice on water harvesting such as roadside	Complied																								

Criterion / Indicator		Assessment Findings	Compliance																																								
	- Minor compliance -	drains construction of conservation terraces, pruned fronds stacking in the palm row.																																									
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value																																											
4.5.6.1	<p>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:</p> <p>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</p> <p>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.</p> <p>- Major compliance -</p>	<p>a) Segaria Estate conduct re-assessment to collate information relating to HCV area. The assessment consists of the information of both planted area, relevant wider landscape-level, and HCV identification result.</p> <p>Document review, Segaria Estate has identified HCV area as follows. Data in ha otherwise stated.</p> <table border="1"> <thead> <tr> <th rowspan="2">No.</th> <th rowspan="2">Description</th> <th colspan="2">Nov 2018</th> <th colspan="2">27/08/2021</th> </tr> <tr> <th>Ha</th> <th>%</th> <th>Ha</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>HCV 1,2, 3 areas</td> <td>108.41</td> <td>2.29</td> <td>85.20</td> <td>1.80</td> </tr> <tr> <td>2.</td> <td>HCV 1,2,3 and 4 (Buffer Zone)</td> <td>-</td> <td>-</td> <td>1.14</td> <td>0.02</td> </tr> <tr> <td>3.</td> <td>HCV 4 Riparian Buffers/ Steep Areas</td> <td>105.21</td> <td>2.23</td> <td>111.63</td> <td>2.36</td> </tr> <tr> <td>4.</td> <td>Total HCV Areas (Without overlap)</td> <td>209.05</td> <td>4.42</td> <td>197.97</td> <td>4.18</td> </tr> </tbody> </table> <p>Difference of 11.08ha. Reassessment made as Segaria Estate has identified discrepancies between the HCV mapped and on the ground situation. A realignment exercise to improve the mapping accuracy to reflect on the ground conditions based on the emergence of high-resolution satellite images of the area. The results of assessment and identification of HCV described in 2018 report mentioned remains valid and unaltered.</p> <p>Other details as follows.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>HCV</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>	No.	Description	Nov 2018		27/08/2021		Ha	%	Ha	%	1.	HCV 1,2, 3 areas	108.41	2.29	85.20	1.80	2.	HCV 1,2,3 and 4 (Buffer Zone)	-	-	1.14	0.02	3.	HCV 4 Riparian Buffers/ Steep Areas	105.21	2.23	111.63	2.36	4.	Total HCV Areas (Without overlap)	209.05	4.42	197.97	4.18	No.	HCV	Description				Complied
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Criterion / Indicator		Assessment Findings	Compliance						
		<p>6. Legal aspects</p> <p>7. Immediate and long-term effect.</p> <p>There were also presence of rivers and burial grounds (Muslim & Christian) for local communities within the Estate.</p>							
<p>4.5.6.2</p>	<p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>a) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p>- Major compliance -</p>	<p>a) Segaria Estate monitor RTE or high biodiversity value at their operations fields and able to demonstrate to observe species presence includes snakes, monkeys, and wild boars. The management and monitoring plan for HCV areas reviewed in annually basis. There were displays of signage made at site i.e.</p> <ol style="list-style-type: none"> 1. No fishing, no manuring/ no spraying 2. No spraying/ no hunting/ no swimming 3. Muslim & Christian cemetery signage <p>b) Segaria Estate continuously conduct program to all workers in pertaining to the awareness of HCV areas and RTE species. Onsite interview with the sampled worker informed they been briefed during the ad-hoc session and morning muster by the Sustainability Unit programs. They informed aware of reminders as follow.</p> <ol style="list-style-type: none"> 1. An offence to capture, harm, kills any wildlife. 2. Disciplinary measures shall be taken if found violating company rules. 3. Riparian buffer zone to be free from any chemical/s application/pollution 4. Relevant signs NO HUNTING NO FELLING ALLOWED <p>Training in relation to the HCV management is shown below:</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Estate - Subject</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Buffer zone maintenance</td> <td>23/09/22</td> </tr> </tbody> </table>	No.	Estate - Subject	Date	1	Buffer zone maintenance	23/09/22	<p>Complied</p>
No.	Estate - Subject	Date							
1	Buffer zone maintenance	23/09/22							

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Criterion / Indicator		Assessment Findings			Compliance
		2	Pesticides handling - SOP	12/11/22	
		3	Spraying guidelines	17/01/23	
		4	Policies briefing - RSPO & MSPO	16/01/23	
		5	RTE/ HCV/ Buffer Zone - Guide	07/12/22	
4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required. - Major compliance -	Segaria Estate established HCV Assessment Report included with RTE assessment. Therein providing wildlife database categories of. 1. Birds/ Mammals 2. Herpetofauna/ Conservation status 3. Offence and penalties under Wildlife Conservation Act 2010 4. Provocation of wildlife Review on records there is no RTE species observed/spotted within estate operation fields. Relevant action plans had been established and implemented concerning protection of the riparian, such as identification on map and ground, restriction of no chemical's activities, awareness training to workers and patrolling by Auxiliary Police. The Estate reviewed the HCV management plan annually in -Jan 2023.			Complied
		No.	HCV area	Management & Monitoring	
		1	Protected areas	Boundary markers estate/ forest reserve Signage - no illegal hunting/ collecting & unauthorized entry Patrol the boundary area	
		2	RTE	Inform all stakeholders on HCV assessment/ protection Education & awareness for workers Ensure no agrochemical activities at bordering water bodies	

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Criterion / Indicator		Assessment Findings		Compliance
		3	<p>Sacred sites</p> <p>Clear demarcation and proper fencing at identified HCV Inform community concerning utilization of site To maintain cleanliness/ upkeep of areas Maintain a buffer in order to secure the area from fire and other disturbances To include areas in HCV map</p>	
		4	<p>Ecosystem</p> <p>Place clear boundary markers between estate/ forest reserve. Place signage on no illegal activities Patrol boundary areas within forest reserve regularly Socialize the HCV assessment consisting of identification management/ monitoring to all employees Information to stakeholders on the HCV</p>	
Criterion 4.5.7: Zero burning practices				
4.5.7.1	<p>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.</p> <p>- Major compliance -</p>		<p>BPB Group maintained the current Zero Open Burning Policy established July 2008.</p> <p>Document review on Segaria Estate replanting program spanned over the forthcoming years.</p> <p>Onsite visit to field PR20/21/22 and onsite interviews with sampled workers informed they do not practice open burning during palm oil cultivation activities.</p>	Complied
4.5.7.2	<p>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.</p>		<p>No areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. Therefore, not required treatment by burning method.</p>	Not Applicable

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	- 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. - Major compliance -	There is no controlled burning carried out in preparation of replanting in Segaria Estate. There are no infected oil palms observed at field operations that required treatment by burning method. There is no application for approval of controlled burning.	Not Applicable
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	BPB Group established Agricultural Manual that describes the standard practice on the specification of work orders in event of land preparation during a replanting. However, there are variations of practices between inland and coastal Estate. Trunks are felled and chipped without having to shred and windrowed in certain conditions. Adjustment of work requirement are finalized from the directive of the replanting unit and the BU office. There was no evidence that fire had been used to prepare land for replanting in the estate. No fire was used for waste disposal.	Complied
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	Segaria Estate continued to have a management strategy for planting on slopes to minimize and control erosion and degradation of soils. The plantings on slopes between nine (9) and 25 degrees was guided by: <ol style="list-style-type: none"> 1. Slope & River Protection Policy 2. Buffer Zone and 25-degree slope 3. Land Preparation for terracing in OPC Manual. 	Complied

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Criterion / Indicator		Assessment Findings	Compliance												
4.6.1.2	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals. - Major compliance -	It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crops were planted in the replants and in mature areas. The cover crop <i>Mucuna bracteate</i> had been planted along some slopes by management. Large areas with <i>Neprolepis biserrate</i> in the inter rows were sighted during the visit. The topography maps were provided by AAR with details showing the various terrain and slope categories in the Estate.	Complied												
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	Segaria Estate visited had established a visual identification reference system for each field. Field maps had been documented and markings of field boundaries were sighted during field visit. The following markers were sighted and visited. <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>No.</th> <th>Field no</th> <th>Field no</th> <th>Field no</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PM 03A</td> <td>PM 10 G</td> <td>PM 94 B</td> </tr> <tr> <td>2</td> <td>PM 00B2</td> <td>PM11 D</td> <td>PM 06 A</td> </tr> </tbody> </table>	No.	Field no	Field no	Field no	1	PM 03A	PM 10 G	PM 94 B	2	PM 00B2	PM11 D	PM 06 A	Complied
No.	Field no	Field no	Field no												
1	PM 03A	PM 10 G	PM 94 B												
2	PM 00B2	PM11 D	PM 06 A												
Criterion 4.6.2: Economic and financial viability plan															
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	Segaria Estate continued to achieve long term economic and financial viability through documented management plan projected to year 2026. Since there are no smallholders in this Business Unit, therefore a business case for scheme smallholders is not considered. 1. A Management Plan including crop forecast, capital expenditure, operational expenditure, general charges, profit and loss covering the period of 2023 to 2028 had been prepared for all the Estate and made available to the audit team.	Complied												

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Criterion / Indicator		Assessment Findings	Compliance																														
		<p>2. This plan had also included mature area and also for the forecasted FFB production per hectare for the period 2023 to 2028.</p> <p>3. The Estate had a standard budgeting format. The records were reviewed during the audit. The Business Plan also included a 5-year budget/ forecast financial plan (i.e., 2023-2028) with allocation on the following:</p> <ul style="list-style-type: none"> • Crop yielding area/ Prime mature • Total mature/ Cost/ha • General charges/ upkeep/ collection/ depreciation • CAPEX <p>4. The component of the budget comprises of the following items:</p> <ul style="list-style-type: none"> • Labour statement/ Allocation of wages • Labour benefit summary/ Labour reconciliation • Yield statement oil palm • Summary of vehicle and running schedule • Job allocation for vehicles/ Summary of workshop running schedule • Summary if budget/ Summary of general charges • CAPEX, oil palm mature and young mature <p>Format of Estate summary expenditure is as per the following content. Figures were extracted out for reason of confidentiality.</p> <table border="1"> <thead> <tr> <th>Years</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> <th>2028</th> </tr> </thead> <tbody> <tr> <td>Mature Ha</td> <td>3,779.40</td> <td>3,814.10</td> <td>3,837.40</td> <td>3,808.10</td> <td>3,777.10</td> </tr> <tr> <td>Immature Ha</td> <td>685.70</td> <td>651.00</td> <td>627.70</td> <td>657.00</td> <td>688.00</td> </tr> <tr> <td>Total Planted Ha</td> <td>4,465.10</td> <td>4,465.10</td> <td>4,465.10</td> <td>4,465.10</td> <td>4,465.10</td> </tr> <tr> <td>FFB Tons</td> <td>78,000.00</td> <td>80,200.00</td> <td>81,600.00</td> <td>81,200.00</td> <td>81,400.00</td> </tr> </tbody> </table>	Years	2024	2025	2026	2027	2028	Mature Ha	3,779.40	3,814.10	3,837.40	3,808.10	3,777.10	Immature Ha	685.70	651.00	627.70	657.00	688.00	Total Planted Ha	4,465.10	4,465.10	4,465.10	4,465.10	4,465.10	FFB Tons	78,000.00	80,200.00	81,600.00	81,200.00	81,400.00	
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Criterion / Indicator		Assessment Findings					Compliance												
		Yield/Ha	20.85	21.03	21.26	21.32	21.55												
		RM/mt FFB	X	X	X	X	X												
		RM/Ha	X	X	X	X	X												
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. - Major compliance -	Segaria Estate established replanting programs in place from year 2022 until 2026. Review on the program updated once a year and incorporated into their annual financial budget. The program sighted for the next five (5) years in hectares as follows <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Years</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>Total ha</td> <td>0.00</td> <td>251.4</td> <td>190.9</td> <td>208.7</td> <td>0.00</td> </tr> </tbody> </table>					Years	2022	2023	2024	2025	2026	Total ha	0.00	251.4	190.9	208.7	0.00	Complied
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Total ha	0.00	251.4	190.9	208.7	0.00														
4.6.2.3	The business or management plan may contain: a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production: cost per tonne of FFB d) Price forecast e) Financial indicators: cost benefit, discounted cash flow, return on investment - Major compliance -	Segaria Estate established Projected Cash Flow Statement Management Plan includes the following details. <ol style="list-style-type: none"> 1. FFB Crop Production and yield per ha 2. Crop protection from 2023 until year 2028 3. Cost per mt FFB with estimated in 2023 RM/FFB 4. Price forecast 5. Financial indicators 					Complied												
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 -	Segaria Estate established management plan to monitor the mechanism on ensuring consistency of implementation of the procedures is made through various activities includes. <ol style="list-style-type: none"> 1. OSH workplace inspection on quarterly basis. 2. Agronomist annual visit latest. Among other areas checked <ul style="list-style-type: none"> • Appearance of palm/ Ground cover and soil management 					Complied												

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Criterion / Indicator		Assessment Findings	Compliance								
		<ul style="list-style-type: none"> Nursery/ Replanting program Pest & Disease Leaf analysis/ soil analysis Yield/ fertilizer recommendations 3. Planting Advisor visits 4. Monthly meeting with Head of Business Unit to review the cost and Estate crop performance.									
Criterion 4.6.3: Transparent and fair price dealing											
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	BPB Group HQ management practice to conduct tender and monitor pricing mechanism in Sabah Region Office includes endorsement of the projects are tendered from the approved vendors registered and payments through system named PIMACS. This is available in the guidelines LOA (limit of authority) and revised sourcing method for plantation procurement. Upon end of the month, Segaria Estate management will verify the completion of job and acknowledged by vendors' representatives. As at to date no complaints were received from the vendor/supplier on issues relating to pricing and timing of payment.	Complied								
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Segaria Estate manage all contracts and purchases documented includes of purchase orders and invoices signed by both vendor and estate representatives. Example sampled of contract agreement as follow. <table border="1" data-bbox="1025 1284 1865 1385"> <thead> <tr> <th>No.</th> <th>Contractor</th> <th>Validity</th> <th>Nature of work</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Seng Lee Enterprise</td> <td>31/12/2023</td> <td>FFB transportation to Segaria Mill</td> </tr> </tbody> </table>	No.	Contractor	Validity	Nature of work	1	Seng Lee Enterprise	31/12/2023	FFB transportation to Segaria Mill	Complied
No.	Contractor	Validity	Nature of work								
1	Seng Lee Enterprise	31/12/2023	FFB transportation to Segaria Mill								

Criterion / Indicator		Assessment Findings	Compliance								
Criterion 4.6.4: Contractor											
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	Segaria Estate manage all contracts which is includes the requirement been specified and explained during the MSPO training and briefing session during the stakeholders meeting. In addition, the contract also specified the following for the MSPO adherence. 1. MSPO certification requirement <ul style="list-style-type: none"> • Ensure operations in compliance to MSPO standard • Agrees to be assessed by MSPO auditors. 2. Compliance with laws 3. Scope and standard of work 4. Illegality 5. Responsibility	Complied								
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Segaria Estate manage all contracts/ agreement/ purchase orders established by BPB Group with standard format content of which are variable subject to the type/ nature of work to be executed. All contracts are signed by both estate management and contractors indicating agreement of the terms and conditions therein. Example sampled of contract agreement as follow. <table border="1"> <thead> <tr> <th>No.</th> <th>Contractor</th> <th>Validity</th> <th>Nature of work</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Seng Lee Enterprise</td> <td>31/12/23</td> <td>FFB transportation to Segaria Mill</td> </tr> </tbody> </table>	No.	Contractor	Validity	Nature of work	1	Seng Lee Enterprise	31/12/23	FFB transportation to Segaria Mill	Complied
No.	Contractor	Validity	Nature of work								
1	Seng Lee Enterprise	31/12/23	FFB transportation to Segaria Mill								
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.	Segaria Estate manage all contracts which is includes the requirement been specified and explained during the MSPO training and briefing	Complied								

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	<p>session during the stakeholders meeting on the details stated in clause no 10</p> <ol style="list-style-type: none"> 1. Cause no 10: The Contractor must comply with the OSHA Rules & Regulations, MSPO and RSPO compliance such as wearing PPE during work and implemented work safety procedures. 2. Clause no 10: The Company reserve the right to fine the Contractor at a reasonable rate if the Contractor failed to comply with OSHA Rules & Regulation, MSPO and RSPO compliance. 	
4.6.4.4	<p>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.</p> <p>- Major compliance -</p>	<p>Segaria Estate management responsible to check and verified all works performed by contractors on daily basis includes the FFB transporter dispatching to the mill. The target is zero crop balance in the field unless under unforeseen situation.</p>	Complied
4.7 Principle 7: Development of new planting			
Criterion 4.7.1: High biodiversity value			
4.7.1.1	<p>Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation.</p> <p>- Major compliance -</p>	<p>No new planting was observed or planned by the Segaria Estate management. Thus, this principle is not applicable.</p>	Not Applicable
4.7.1.2	<p>No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia’s National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more</p>	<p>No new planting was observed or planned by the Segaria Estate management. Thus, this principle is not applicable.</p>	Not Applicable

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Criterion / Indicator		Assessment Findings	Compliance
	requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required. - Major compliance -		
Criterion 4.7.2: Peat Land			
4.7.2.1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - Major compliance -	No new planting was observed or planned by the Segaria Estate management. Thus, this principle is not applicable.	Not Applicable
Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)			
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. - Major compliance -	No new planting was observed or planned by the Segaria Estate management. Thus, this principle is not applicable.	Not Applicable
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. - Major compliance -	No new planting was observed or planned by the Segaria Estate management. Thus, this principle is not applicable.	Not Applicable
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. - Major compliance -	No new planting was observed or planned by the Segaria Estate management. Thus, this principle is not applicable.	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
4.7.3.4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. - Minor compliance -	No new planting was observed or planned by the Segaria Estate management. Thus, this principle is not applicable.	Not Applicable
Criterion 4.7.4: Soil and topographic information			
4.7.4.1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. - Major compliance -	No new planting was observed or planned by the Segaria Estate management. Thus, this principle is not applicable.	Not Applicable
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - Major compliance -	No new planting was observed or planned by the Segaria Estate management. Thus, this principle is not applicable.	Not Applicable
Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils			
4.7.5.1	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - Major compliance -	No new planting was observed or planned by the Segaria Estate management. Thus, this principle is not applicable.	Not Applicable
4.7.5.2	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation.	No new planting was observed or planned by the Segaria Estate management. Thus, this principle is not applicable.	Not Applicable

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	No new planting was observed or planned by the Segaria Estate management. Thus, this principle is not applicable.	Not Applicable
Criterion 4.7.6: Customary land			
4.7.6.1	No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. - Major compliance -	No new planting was observed or planned by the Segaria Estate management. Thus, this principle is not applicable.	Not Applicable
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	No new planting was observed or planned by the Segaria Estate management. Thus, this principle is not applicable.	Not Applicable
4.7.6.3	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. - Major compliance -	No new planting was observed or planned by the Segaria Estate management. Thus, this principle is not applicable.	Not Applicable
4.7.6.4	The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement.	No new planting was observed or planned by the Segaria Estate management. Thus, this principle is not applicable.	Not Applicable

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	No new planting was observed or planned by the Segaria Estate management. Thus, this principle is not applicable.	Not Applicable
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. - Major compliance -	No new planting was observed or planned by the Segaria Estate management. Thus, this principle is not applicable.	Not Applicable
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance -	No new planting was observed or planned by the Segaria Estate management. Thus, this principle is not applicable.	Not Applicable
4.7.6.8	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. - Minor compliance -	No new planting was observed or planned by the Segaria Estate management. Thus, this principle is not applicable.	Not Applicable

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

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	Policy for the implementation of MSPO shall be established. - Major compliance -	Segaria POM adopted Boustead Plantations Berhad (BPB) Group’s established policy for the implementation of MSPO which was signed by Chief Executive Officer dated 02/12/2021. Segaria POM conduct briefing on MSPO policy to workers dated on 17/02/2023.	Complied
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - Major compliance -	BPB Group policy established emphasized on the engagement and commitment to produce sustainable palm oil with the objective of improving the milling operation. The policy emphasized the commitment of continuously improve the effectiveness of quality management system for company’s traceability and transparency of supply chain. The policy also emphasized commitment of continuous stakeholder engagement that strive to continue to be an active supporter of the sustainability initiative and will work to strengthen MSPO standards and adherence to it.	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	BPB Group HQ team plan to audit Segaria Business Unit on 13/12/2022 until 15/12/2022. BPB Group established Internal audit procedure, rev.02, issue no.01, updated on 24/05/2022.	Complied

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		<p>As per SOP established, the internal audit shall be carried out once a year guided by the annual audit schedule. Follow up audit can be carried out as and when it is required. The GE Department/Sustainability Chairman will fix the date of the audit with management representative.</p> <p>Latest internal audit for Segaria POM was conducted on 15- 18/11/2021. Internal auditor training Certificate of Achievement for MSPO MS 2530:2013 Lead Auditor Course of Mr. Azrin Mazhidi Bin Abdul Manab; Cert. # MSPO 55784; Held on 25-29/6/2018 by SIRIM STS Sdn. Bhd.</p>	
4.1.2.2	<p>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.</p> <p>- Major compliance -</p>	<p>BPB Group established Internal audit procedure, rev.02, issue no.01, updated on 24/05/2022.</p> <p>As per SOP established, the internal audit shall be carried out once a year guided by the annual audit schedule. Follow up audit can be carried out as and when it is required. The GE Department/Sustainability Chairman will fix the date of the audit with management representative</p> <p>The procedure established a system that may be utilized to comply with the relevant element of a formal certification scheme.</p> <p>For each non-conformance noted, the management representative will propose corrective action plan necessary and time for completion. Where possible, corrective actions are discussed with the management representative during the closing meeting. An investigation finding is also required to study the reason for such non-conformance. If any case, the operating unit can propose and communicate the corrective actions to the lead auditor from time to time. Operating unit should give response or action plan within 2 weeks. All corrective action together with evidence shall be submitted to Lead Auditor within one (1) month form the date of audit.</p>	Complied

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		Internal Audit was conducted on 13/12/2022 until 15/12/2022 by HQ Team. Document review of Internal Audit Report with report No.: 01/2022, 1 finding raised with NCR Category as Critical/Major. The finding issued being review by lead auditor on 06/01/2023. which were all resolved and verified closed by the lead auditor on 06/01/2023.	
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	All records related to Internal Audit was well maintained and made available for review. The operating units maintained all audit reports and corrective action plan and available for review.	Complied
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	Segaria Business Unit conduct management review with minutes records on 12/01/2023. The meeting attended by the Head of Business Unit Head, all operating units’ managers, and committee members. Document review on minutes of meeting, verified the meeting agenda includes with the discussion on the internal audit conducted on 13/12/2022 until 15/12/2022. The discussion is to review the continuous correction plan and improvement based on nonconformity closed on 06/01/2023.	Complied
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. - Major compliance -	Segaria POM established Continuous Improvement Plan for 2023 based on main element includes social and environmental impact as per sample as following: The plan established based on outcome from stakeholders meeting and	Complied

Criterion / Indicator		Assessment Findings	Compliance
		nonconformance raised during internal/external audit. Based on document review, the plan updated on 01/01/2023 includes the potential issues raised, impact, opportunities for improvement and timelines. The updated plan has considered by includes with safety and health elements.	
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. - Major compliance -	Segaria POM adopt BPB Group’s system to improve practices in line with new information and techniques such as using the social board, external stakeholder meeting, management meeting and morning muster rollcall as platform to disseminate information.	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms. - Major compliance -	Segaria POM maintained records of request and response, land titles, OSH plans and etc. relating to environmental and social issues, plans for pollution prevention, complaints and grievances records that make available upon request. Latest external stakeholder meeting conducted at meeting room Segaria Estate’s office on 27/10/2022 which attended by Segaria POM’s representatives. Agenda of meeting includes company policies, communication procedures (any complaint/grievance channel through phone called (089-707315), email (segariaest@bplant.com.my), official letter to managers and request/response form), emergency action plan, buffer zone & recovery HCV area, mill process flow, introduction on MSPO & RSPO certification, Force labour indicator, social amenities, environmental recovery and questionnaire session. No negative feedbacks received during the session. 36 externals attended involve	Complied

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Criterion / Indicator		Assessment Findings	Compliance						
		<p>suppliers, contractors, transporters, neighbouring estates, government agencies and school.</p> <p>Latest internal stakeholder 01/2022 consultation was conducted face to face physically to workers conducted during morning briefing on 17/10/2022. Agenda of meeting includes objective, company policies, annual activities, raised concern includes (new minimum salary which has been briefed separately earlier on 15/08/2022, compulsory of using PPE, complaint procedure, prohibition to work during rest day, road upgrading in front of mill main gate), external & internal audit report and others.</p>							
4.2.1.2	<p>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.</p> <p>- Major compliance -</p>	<p>Segaria POM kept copies all management documents publicly available. Copies of the document includes environmental and social issues, plans for pollution prevention, records of complaints and grievances.</p> <p>BPB Group's policies such as Pesticide Use Policy, Human Rights Policy, Foreign Workers Policy, etc. are available publicly in company website; https://www.bousteadplantations.com.my/sustainability-approach-policies/.</p>	Complied						
Criterion 4.2.2 – Transparent method of communication and consultation									
4.2.2.1	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p>	<p>Segaria POM adopt BPB Group's Consultation Procedure established includes the objectives as follow.</p> <ol style="list-style-type: none"> 1. Change of information and sharing of ideas between estate management and internal as well as external stakeholders 2. To assess and identify relevant topics for mutual benefits <p>The procedure describes type, method and frequency of consultations as follow table.</p> <table border="1"> <thead> <tr> <th>Type</th> <th>Method</th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Type	Method	Frequency				Complied
Type	Method	Frequency							

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Criterion / Indicator		Assessment Findings			Compliance
		Muster call	Assembly	Daily	
		Management meeting	Face to face	Weekly	
		Staff meeting	Face to face	Monthly	
		Workers' meeting	Face to face	6-monthly	
		Stakeholders' meeting	Face to face	Annually	
		Public notification	Signboard	As required	
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 -	Segaria POM maintained by nominated Mr. Musliadil Bin Maggu as person in- charge of communication with appointment letter since 07/01/2022.			Complied
4.2.2.3	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. - Major compliance -	<p>Segaria Estate maintained records of list of stakeholders with internal updated on 04/01/2023 and external updated on 12/01/2023.</p> <p>Latest external stakeholder meeting conducted at meeting room Segaria Estate's office on 27/10/2022 which attended by Segaria POM's representatives. Agenda of meeting includes company policies, communication procedures (any complaint/grievance channel through phone called (089-707315), email (segariaest@bplant.com.my), official letter to managers and request/response form), emergency action plan, buffer zone & recovery HCV area, mill process flow, introduction on MSPO & RSPO certification, Force labour indicator, social amenities, environmental recovery and questionnaire session. No negative feedbacks received during the session. 36 externals attended involve suppliers, contractors, transporters, neighbouring estates, government agencies and school.</p> <p>Latest internal stakeholder 01/2022 consultation was conducted face to face physically to workers conducted during morning briefing on 17/10/2022. Agenda of meeting includes objective, company policies, annual activities, raised concern includes (new minimum salary which has been briefed separately earlier on 15/08/2022, compulsory of using</p>			Complied

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Criterion / Indicator		Assessment Findings	Compliance
		PPE, complaint procedure, prohibition to work during rest day, road upgrading in front of mill main gate), external & internal audit report and others.	
Criterion 4.2.3 – Traceability			
4.2.3.1	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. - Major compliance -	Segaria POM adopt BPB Group’s Supply Chain (SCC) Procedures with Rev.02 updated in October 2017. The procedure established Segaria POM and have the approval from Segaria Business Unit’s RSPO Chairman which covers the implementation of all supply chain requirements.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Segaria POM adopt BPB Group’s Supply Chain (SCC) Procedures with Rev.02 updated in October 2017 describes operating unit to regularly inspect on compliance periodically as internal audit as method to inspect as specified in Criterion 4.1.2. Additional, BPB Group’s Sec. 1.1, Internal Office Control of Administrative Procedure, Chapter.01 dated 02/05/2012 describe routine responsibilities of estate management and staff to conduct related inspections on compliance of all operations including traceability system. The procedure describes the responsibility of person in charge to conduct inspection for traceability system on daily basis.	Complied
4.2.3.3	The management shall identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	Segaria POM adopt BPB Group’s Supply Chain (SCC) Procedures with Rev.02 updated in October 2017 describes Segaria Business Unit’s RSPO 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. Segaria Business Unit maintained the appointment Mill Manager as Sustainability Chairman with appointment letter remain on 01/11/2017.	Complied

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<p>4.2.3.4 Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -</p>	<p>Segaria POM adopt BPB Group’s Supply Chain (SCC) Procedures with Rev.02 updated in October 2017. The procedure established Segaria POM and have the approval from Segaria Business Unit’s RSPO Chairman which covers the implementation of all supply chain requirements.</p> <p>Segaria POM adopt BPB Group’s Sales of Produce Ex-Estate/Mill Procedures dated 2/5/2012 were to maintain CPO & PK delivery documents includes Weighbridge Tickets, Delivery Note and Daily CPO/PK Despatch Summary Logbook.</p> <p>Segaria POM adopt BPB Groups’ Retention of Documents procedure as describes in Chapter 13 that the operating units maintain document with minimum retention period of seven (7) years prior of disposal. Document review on FFB delivery including Weighbridge Tickets, Delivery Note and Daily CPO/PK Summary Logbook as follow sample.</p> <p><u>FFB</u> Ticket No: 473582, 27/01/2023 Delivery Note: A 138944, Field: BLK 72, PM 11D Bunches: 127 Vehicles: SAA 5310G Weighbridge: 473582, Weight: 11,820 kgs</p> <p><u>PK</u> Ticket No: 8350110299948R, 12/01/2023 Seal No: 225492-501 SUPP DO.: 230017 Transporter DO.: 6288, Dated 12/01/2023 Transporter: Yee Ping Trading</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Vehicle No: SD148R, Trailer No.: TS1237 Contract: LDO/36P2212/0027/L Weighbridge Ticket: 473115 DO No.: PK 306202300017 Nett Weight: 32,710kgs Remarks: PKLS00160, RSPO 682292, LDEO <u>CPO</u> Ticket No: 8350110300358R, Dated: 17/01/2023, Seal No: 225578-91 SUPP DO.: 473269 Transporter DO.: 159113, Dated: 17/01/2023, Transporter: Pengangkutan Dagang Tera Vehicle No: RQ8138, Trailer No: T/S446 Contract No: LDO/01P2212/0024L Weighbridge ticket: 473269 DO No.: CPO 306202300023 Nett Weight: 39,700kgs Remarks POLS00480, RSPO 682292 LDEO MPOB: 58110-904000 MPOB L3: G126528</p>	
<p>4.3 Principle 3: Compliance to legal requirements</p>		
<p>Criterion 4.3.1 – Regulatory requirements</p>		

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Criterion / Indicator		Assessment Findings	Compliance
4.3.1.1	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations. - Major compliance -	The list of permit and license required for the operations of the mill were sighted. The sample of permit and license: Segaria POM 1. MPOB license 508110904000 valid until 31/05/2024. 2. DOE License 003471 valid until 30/06/2023. 3. Lesen Pemasangan Persendirian for installation not more than 1700kW valid until 11/09/2023. 4. Machineries certificate of fitness for Water Tube Boiler (SB PMD 2100), Back Pressure Steam Receiver (SB PMT 9322) and Water Softener (PMT 56918), two (2) air receivers (SB PMT 6492 & SB PMT 6494) valid until 07/12/2023. 5. Diesel Storage permit no: KPDNHEP.SPN.600- 1/7/2013/32(P) valid until 04/01/2023. 6. Pemeriksaan Alat Timbang dan Sukat, No. Siri: 00891766 JL, 60,000 Kg. STW-ATK-005588.	Complied
4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirements register. - Major compliance -	Segaria POM adopt BPB Group’s Legal and Other Requirements Register (LORR) established to cover all legal acts, regulations and other requirement. The sample of Act and Legal: 1. Children and Young Person (Employment) (amendment) Act 2010 Updated November 2020 2. Environmental Quality (Amendment) Act 2012 Updated April 2020. 3. Sabah Labour Ordinance 1950 4. OSHA 1994 5. Electrical Supply (Amendment) Act 2015	Complied
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming	Segaria POM adopt BPB Group’s Legal and Other Requirements Register (LORR) established to cover all legal acts, regulations and other requirement. LORR was reviewed annually with latest review was	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	into force. - Major compliance -	conducted on 01/08/2022. The sample of Act and Legal: 1. Occupational Safety and Health Act 1994 2. Factories and Machinery Act 1967 3. Environmental Quality (Amendment) Act 2012 Updated April 2020. 4. Children and Young Person (Employment) (amendment) Act 2010 Updated November 2020 5. National Wages Consultative	
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 -	Segaria POM manager remain the appointment Ms Nur Azizah Binti Lasaffah as person in-charge to monitor compliance and track update the changes in regulatory requirements. Document review sighted appointment letter without any changes with date on 10/06/2021. BPB Group maintain the method of tracking system 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). BPB Group centralized system for tracking any changes in the law and subscribe into Lawnet.	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. - Major compliance -	Segaria POM activities do not diminish the land use rights of other users. The conditions stipulated in the land titles were adhered to.	Complied
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.	Segaria POM was able to show their legal ownership. Document review, sighted mill is located inside Segaria Estate Land area. Based on land title review, the document number kept as follow.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<ol style="list-style-type: none"> Provisional Lease #26290060 dated 24/10/74 (7,317 Acre) Ref. # L.S.1210/1/3/II,25/8/2005 change of name from Ladang Segaria Sdn Bhd to Boustead Emastulin Sdn Bhd Provisional Lease #126290122 dated 1/1/65 (4,012 acres) Ref. # L.S.1210.1.3/II, dated 20/5/2005 change of name from Ladang Segaria Sdn Bhd to Boustead Emastulin Sdn Bhd Provisional Lease #125311284 dated 17/4/75 (398.9 Acres) Ref. # L.S.1210.1.319, dated 20/5/2005 change of name from Ladang Segaria Sdn Bhd to Boustead Emastulin Sdn Bhd <p>The actual mill occupied the area including factory building, office building, workers & staff housing building and effluent ponds.</p>	
4.3.2.3	<p>Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p> <p>- Major compliance -</p>	<p>Onsite visit sighted the legal perimeter for Mill boundaries were demarcated with fences around mill compound.</p>	Complied
4.3.2.4	<p>Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC).</p> <p>- Minor compliance -</p>	<p>BPB Group’s established Fair Compensation Procedure (Procedure 6.4.1); Ref. # 1; issued date: 4/2/2015; version 01. The procedure has clearly stated the process of negotiation and compensation if any land disputes with Legal Department. If the negotiation process failed, legal proceedings will be the next action.</p> <p>However, there was no land dispute on the land as is only applicable for the estate as landowner. The company has the legal ownership documents as demonstrated by possessing land titles.</p>	Not Applicable
<p>Criterion 4.3.3 – Customary rights</p>			

Criterion / Indicator		Assessment Findings	Compliance
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	There was no land dispute on the land as is only applicable for the estate as landowner. The company has the legal ownership documents as demonstrated by possessing land titles.	Not Applicable
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	There was no land dispute on the land as is only applicable for the estate as landowner. The company has the legal ownership documents as demonstrated by possessing land titles.	Not Applicable
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	There was no land dispute on the land as is only applicable for the estate as landowner. The company has the legal ownership documents as demonstrated by possessing land titles.	Not Applicable
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	BPB Group's HQ hired third party's consultant to established Social Impact Assessment for Boustead Emastulin Sdn. Bhd. covered Segaria Estate and Mill, Semporna, Sabah, Malaysia date from 27/09/2017 until 01/10/2017. Site of Assessment Area is 3,071.60 ha (Main Div) and 1,393.50 ha (Sipit Division). Objective of the assessment remain with no changes as follow. 1. To collect all the information related to social issues and workers' livelihood in Segaria Estate and Mill. 2. To propose management actions based on the identified social impacts.	Complied

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	<p>3. To provide recommendations to manage the social impacts that have occurred and to anticipate the social impacts that are likely to arise (advancing benefits and mitigating adverse effects) and,</p> <p>4. To propose monitoring measures for the identified impacts to demonstrate continuous improvement.</p> <p>From the assessment conduct, Segaria POM collect feedback with relevant issues from external stakeholders meeting into Social Action Plan Year 2022/2023 with updated 01/11/2022.</p> <p>Latest external stakeholder meeting conducted at meeting room Segaria Estate’s office on 27/10/2022 which attended by Segaria POM’s representatives. Agenda of meeting includes company policies, communication procedures (any complaint/grievance channel through phone called (089-707315), email (segariaest@bplant.com.my), official letter to managers and request/response form), emergency action plan, buffer zone & recovery HCV area, mill process flow, introduction on MSPO & RSPO certification, Force labour indicator, social amenities, environmental recovery and questionnaire session. No negative feedbacks received during the session. 36 externals attended involve suppliers, contractors, transporters, neighbouring estates, government agencies and school.</p> <p>Latest internal stakeholder 01/2022 consultation was conducted face to face physically to workers conducted during morning briefing on 17/10/2022. Agenda of meeting includes objective, company policies, annual activities, raised concern includes (new minimum salary which has been briefed separately earlier on 15/08/2022, compulsory of using PPE, complaint procedure, prohibition to work during rest day, road upgrading in front of mill main gate), external & internal audit report and others.</p>	

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		<p>Document review on the action plan as follow example: Housing: Worker’s housing complex Matters raised: Hygiene and cleanliness at housing complex. Monitoring: Housing inspection on weekly basis based on requirement. Status: Continuous practice Document review, sighted mill management conduct inspection by using ‘Borang Laporan Mingguan Perumahan Pekerja’ latest was conducted by ‘Ketua Kampung’ on 20/02/2022. Based on the document reported total occupied house, activities, health, visitor visit and others.</p>	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	<p>A system for dealing with complaints and grievances shall be established and documented. - Major compliance -</p>	<p>BPB Group established Policy and Procedures – Grievance Procedure with Doc. No.: HR/2022/023/003, Rev.0 update on 01/03/2022. The procedure describes immediate superior need to respond within 3 days of the complaint received and further 5 days if the respond has not been satisfied. It has been verified through interview that the system able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. 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.</p>	Complied
4.4.2.2	<p>The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - Major compliance -</p>	<p>The Complaint/Suggestion forms available in the suggestion box area in front of the estate office. Consultation made with the stakeholders confirmed that they are aware and understood about the complaint procedure. Based on the records, all the complaints were lodged by internal</p>	Complied

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		<p>stakeholders and generally about defects of housing facility, and request of facility (e.g. transport to town, extension of electricity supply)</p> <p>There was no complaint or grievance lodged by external stakeholder since the last assessment. Verification of the records of complaints lodged the actions taken by the management were found to be appropriate and timely manner.</p>	
4.4.2.3	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints.</p> <p>- Minor compliance -</p>	<p>The complaint forms were available at the operating unit's office, where the stakeholders can easily access should it be needed. Among the information available in the form is name of requestor/complainant, date of request, details of complaint/grievance, details of action taken including dates and acknowledgement signature of the requestor.</p>	Complied
4.4.2.4	<p>Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time.</p> <p>- Minor compliance -</p>	<p>Employees and the surrounding communities were made aware that complaints or suggestions can be made any time through various meetings such as morning muster, training/briefing, and stakeholder consultation. Based on interview with the stakeholders, it was noted that they were aware of the complaint's procedure.</p> <p>Latest external stakeholder meeting conducted at meeting room Segaria Estate's office on 27/10/2022 which attended by Segaria POM's representatives. Agenda of meeting includes company policies, communication procedures (any complaint/grievance channel through phone called (089-707315), email (segariaest@bplant.com.my), official letter to managers and request/response form) and questionnaire session. No negative feedbacks received during the session. 36 externals attended involve suppliers, contractors, transporters, neighbouring estates, government agencies and school.</p> <p>Latest internal stakeholder 01/2022 consultation was conducted face to face physically to workers conducted during morning briefing on</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		17/10/2022. Agenda of meeting includes objective, company policies, complaint procedure and others.	
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. - Major compliance -	Segaria POM maintained complaints and resolutions record over the past 24 months (i.e. from February 2020) and all the records are available as at audit. The management has started to implement the complaint form since implementation of RSPO certification in October 2017. The records of complaint were available from October 2017 up to date.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation. - Minor compliance -	BPB Group contribute to local development in consultation with the local communities. <ol style="list-style-type: none"> 1. BPB HQ committed to advancing its business sustainably while propelling the economic growth of the surround communities for obtained approximately 4% of total external FFB from surrounding smallholders. 2. Biodiversity protection and conservation of HCV areas. Empowering Orang Asli through business opportunist by employed them to work in BPB estates. 3. BPB HQ engages with smallholders and out-growers on NDPE commitment to purchase FFB from responsible source and requirement for them to comply with the 'No Deforestation, No Peat and No Exploitation' commitment as per BPlant Sustainability Policy on 14/02/2023. 4. BPB HQ conduct Kotak Rezeki initiative benefits hundreds of surrounding communities needy on 14/11/2022. 	Complied

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	<p>5. BPB HQ distributes wakalah zakat to 200 army veterans through cooperation with Persatuan Veteran Angkatan Tentera Malaysia on 25/10/2022.</p> <p>6. BPB HQ is continuing to contribute improvement of living condition of surrounding communities on Community Road Maintenance Programmed near Segamaha & Rimba Nilai Business Units.</p> <p>7. BPB HQ has Nurturing future generations through education collaboration with Indonesia Consulate and approval of Malaysia's Ministry of Education on 23/05/2022</p> <p>8. BPB HQ conduct Jelajah Kasih Ramadhan deliver smiles to 2,400 disadvantaged people especially old folks on 09/05/2022.</p> <p>9. BPB HQ established Bank Pakaian BPB delivers smile to the needy on 25/04/2022.</p> <p>10. BPB HQ established Jelajah Kasih Ramadan to bringing smiles to the needy especially old folks on 11/04/2022.</p> <p>11. BPB HQ continuously supporting oil palm smallholders' development program on 06/04/2022.</p> <p>12. BPB HQ take initiative to contribute for flood relief in Terengganu on 12/03/2022.</p> <p>Segaria POM continuously and maintained the CSR program with both internal and external communities as per sample as follow.</p> <ol style="list-style-type: none"> 1. Segaria POM's female community through Segaria Women Association (Pewanis) to conducted social event involving workers' birthday. 2. Segaria POM collaboration with Segaria Estate continuously support Blood Donation Campaign with Hospital Semporna and Hospital Kunak. 	

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.4.4: Employees safety and health			
<p>4.4.4.1</p>	<p>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.</p> <p>- Major compliance -</p>	<p>BPB Group maintained the current Group Occupational Safety & Health Management Policy and Plan signed by the CEO dated 12/7/2021. The policy displayed prominently on notice boards in English and local language Bahasa Malaysia.</p> <p>The Policy is implemented through the OSH activities by the on-site Safety Officers and monitored by OSH Manager from Head Office. Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees, contractors & visitors. Commitment to be responsibilities of both employer & employees. The policy as committed will be reviewed/revised as deemed appropriate. In Interviews with the workers and staff during the site visit revealed that the employees have been briefed and has understood the policy.</p>	<p>Complied</p>
<p>4.4.4.2</p>	<p>The occupational safety and health plan should cover the following:</p> <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> i. All employees involved are adequately trained on safe working practices; 	<ul style="list-style-type: none"> a) The policy has been established and elaborated in item 4.4.4.1 above. The policy among others has mentioned the details of the policy statement and the direction of the organization towards implementing ESH practices. The clause 'A safety and health policy, which is communicated and implemented' is mentioned in the policy. Safety briefing to employees & contractors was made in several training sessions inclusive of safety requirement of the organization. b) Segaria POM had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following. <ul style="list-style-type: none"> 1. Change in work process 	<p>Complied</p>

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<ul style="list-style-type: none"> ii. All precautions attached to products should be properly observed and applied; d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as 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 and 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. 	<ul style="list-style-type: none"> 2. Revision/ changes in legislative requirement 3. Occurrence of accidents <p>HIRARC for the mill was formalized on in Mac 2011 and recent review made dated 23/08/2021. The significant and routine activities for mill were adequately among others as follows.</p> <table border="1" data-bbox="1072 619 1865 922"> <thead> <tr> <th>No.</th> <th>Areas/ Activities</th> <th>No.</th> <th>Areas/ Activities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Reception - Weighbridge</td> <td>9</td> <td>Engine Room</td> </tr> <tr> <td>2</td> <td>Fruit Handling</td> <td>10</td> <td>Product storage</td> </tr> <tr> <td>3</td> <td>Sterilizer</td> <td>11</td> <td>Laboratory</td> </tr> <tr> <td>4</td> <td>Threshing</td> <td>12</td> <td>Water treatment</td> </tr> <tr> <td>5</td> <td>Clarification/ Oil Room</td> <td>13</td> <td>Effluent Treatment Pond</td> </tr> <tr> <td>6</td> <td>Boiler House</td> <td>14</td> <td>Crop reception - Ramp</td> </tr> <tr> <td>7</td> <td>Confined space</td> <td>15</td> <td>Working at height</td> </tr> <tr> <td>8</td> <td>Wet scrubber</td> <td>16</td> <td>Building Construction</td> </tr> </tbody> </table> <p>Appropriate risk control measures were determined and implemented for the respective activities and operation. Most of the moving part and rotating machinery were installed with machine guarding and properly covered. Appropriate administrative controls such as safety signage were displayed at all workstations in the mill office and workshop. In general, the control measures were appropriate to the identified risks.</p> <ul style="list-style-type: none"> c) Segaria POM has an OSH program for Financial Year 2022/2023. The program list as guided by SSD personnel includes the following activities among others. <ul style="list-style-type: none"> 1. OSH committee establishment 2. OSH program & review 3. OSH inspection 	No.	Areas/ Activities	No.	Areas/ Activities	1	Reception - Weighbridge	9	Engine Room	2	Fruit Handling	10	Product storage	3	Sterilizer	11	Laboratory	4	Threshing	12	Water treatment	5	Clarification/ Oil Room	13	Effluent Treatment Pond	6	Boiler House	14	Crop reception - Ramp	7	Confined space	15	Working at height	8	Wet scrubber	16	Building Construction	
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	<p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>4. Health & Hygiene monitoring program</p> <p>5. Monthly/ annual medical check-up</p> <p>6. Safety & health training</p> <ul style="list-style-type: none"> • Fire drill & fire fighting • 1st aid awareness • Chemical safety training <p>d) Segaria POM issued PPE to its employees for their protection at workplace. Records of PPE issued are maintained individually for all employees. PPE issued to the workers is safety helmets, safety shoes. Special PPEs were given to workers assigned to height, confined space. Safety shoes issued on a 6 monthly basis and recorded. During the site visit the staff/workers were noted to be equipped with their proper attire & PPE. Acknowledgement of receipt was recorded. Based on the HIRARC carried out at the mill the PPE types for the various activities has been identified and implemented. Recent issuance was dated 05/7/2022 safety shoes to a Boilerman.</p> <ol style="list-style-type: none"> 1. Mill operator – Safety boots, earmuff, safety vest, helmet, cotton glove 2. Water treatment Plant Operator - Safety boots, earmuff, safety vest, helmet, cotton glove, dust mask. <p>e) Segaria POM established and maintained the HSE Manual (BEA OSH/DP) and Safe Work Procedures with a total of 11 procedures in place (SWP1 – SWP11) updated recent on 26/06/2021 on Accident Reporting Procedure.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>No.</th> <th>SWP</th> <th>Activities</th> <th>No.</th> <th>SWP</th> <th>Activities</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>						No.	SWP	Activities	No.	SWP	Activities							
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Criterion / Indicator		Assessment Findings						Compliance									
		1	SWP 1	Reception Dispatch	7	SWP 6	Clarification										
		2	SWP 2	Fruit Handling	8	SWP 7	Depericarping										
		3	SWP 3	Sterilisation	9	SWP 8	Nut/Kernel Station										
		4	SWP 4	Threshing	10	SWP 9	Boiler House										
		5	SWP 5	Pressing	11	SWP 10	Wet Scrubber										
		6	SWP 11	COVID Procedure	12	SWP -	Accident Reporting										
		<p>f) BPB Group maintained the current manual of the SOP on functional and responsibilities. Segaria POM Manager is appointed as the Chairman of the ESH committee with appointment letter remain with dated 14/05/2018. He is the overall person in charge of the safety and environment of the mill operations. The Mill Manager duties among other to preside the ESH meetings. He in turn delegates the down line duties to the Engineers and Mill Staff/Supervisors.</p> <p>g) Records of regular meetings between the responsible person and workers to discuss about health and safety had been verified to the satisfactory maintained. Occupational Safety Health (OSH) Committee has been established together. The OSH committee organization chart for 2023 was available. OSH Committee meetings were held once in three months. Review of the minutes of the meeting as follow.</p> <table border="1"> <thead> <tr> <th>1st</th> <th>2nd</th> <th>3rd</th> <th>4th</th> <th>Appointment</th> </tr> </thead> <tbody> <tr> <td>06/12/2022</td> <td>18/10/2022</td> <td>15/06/2022</td> <td>15/03/2022</td> <td>14/05/2018</td> </tr> </tbody> </table> <p>OSH Committee meetings confirmed that among the agenda discussed, included the following.</p> <ol style="list-style-type: none"> 1. Passing of previous minutes and arising matters. 						1st	2nd	3rd	4th	Appointment	06/12/2022	18/10/2022	15/06/2022	15/03/2022	14/05/2018
1st	2nd	3rd	4th	Appointment													
06/12/2022	18/10/2022	15/06/2022	15/03/2022	14/05/2018													

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		<p>2. Accident report (Monthly Data of Mill Safety Performance)</p> <p>3. Workplace inspection</p> <p>4. Safety report and programme</p> <p>5. Training</p> <p>6. Environmental issues</p> <p>7. Other matters – COVID-19 compliance</p> <p>h) The procedures for accident and emergencies have been established. There is formation of ERP Team & ERP for all the identified incidences. In addition, the procedures have been summarized in a chart flow form and displayed for information of all employees in the estate. They include emergencies relating fire, chemical spillage, flood and accident at workplace.</p> <p>1. <i>Ahli J/Kuasa Pasukan Bertindak Kecemasan 2023 headed by the Mill Manager</i></p> <p>2. <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Kebakaran</i></p> <p>3. <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Banjir</i></p> <p>4. <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Tumpahan Kimia</i></p> <p>5. <i>Carta Aliran Pelan Tindakan Kecemasan – COVID-19</i></p> <p>The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were issued by SSD and amended to tailor to the situation differences in the estates and mill.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Emergency situation</th> <th>Mill</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Fire</td> <td>/</td> </tr> </tbody> </table>	No.	Emergency situation	Mill	1	Fire	/	
No.	Emergency situation	Mill							
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Criterion / Indicator		Assessment Findings			Compliance																											
		2	Oil spillage	/																												
		3	Effluent overflow	/																												
		4	Chemical spillage	/																												
		5	Flood	-																												
		6	Accident at workplace	-																												
		<p>ERT members received training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The training are conducted by an accredited or qualified organization who can demonstrate their suitability to provide training.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 5%;">No.</th> <th style="width: 15%;">Date</th> <th style="width: 50%;">Subject</th> <th style="width: 20%;">Attendees</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td style="text-align: center;">14/6/2022</td> <td>ERP – Fire</td> <td style="text-align: center;">Entire</td> </tr> <tr> <td style="text-align: center;">2</td> <td style="text-align: center;">17/10/2022</td> <td>Policies briefing and understanding</td> <td style="text-align: center;">Entire</td> </tr> <tr> <td style="text-align: center;">3</td> <td style="text-align: center;">15/08/2022</td> <td>Medical Surveillance</td> <td style="text-align: center;">Entire</td> </tr> <tr> <td style="text-align: center;">4</td> <td style="text-align: center;">31/03/2022</td> <td>Fume hood - Laboratory</td> <td style="text-align: center;">7</td> </tr> <tr> <td style="text-align: center;">5</td> <td style="text-align: center;">21/02/2023</td> <td>DOE Jadual Pematuhan Compliance</td> <td style="text-align: center;">8</td> </tr> <tr> <td style="text-align: center;">6</td> <td style="text-align: center;">17/02/2022</td> <td>ERP - Environment Sustainability</td> <td style="text-align: center;">8</td> </tr> </tbody> </table> <p>i) The trained personnel for the First Aid were among the employees working as staff/Supervisors. The first aid boxes were available at various points in the mill office, workshop, and store. The Mill distributed the first aid box to the Supervisors and relevant mill management team. The trained personnel for the First Aid were among the employees working in the mill on shift and the estates staff/ mandores. The first aid boxes were available at various points</p>				No.	Date	Subject	Attendees	1	14/6/2022	ERP – Fire	Entire	2	17/10/2022	Policies briefing and understanding	Entire	3	15/08/2022	Medical Surveillance	Entire	4	31/03/2022	Fume hood - Laboratory	7	5	21/02/2023	DOE Jadual Pematuhan Compliance	8	6	17/02/2022	ERP - Environment Sustainability
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Criterion / Indicator		Assessment Findings	Compliance																
		<p>in the mill complex including laboratory, office, workshop, process control room etc.</p> <p>j) Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man Day MC.) This is summarized officially in the JKPP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKPP 8 a mandatory requirement with submission as follows. Accident Statistics are being maintained in a satisfactory manner.</p> <table border="1"> <thead> <tr> <th rowspan="2">No.</th> <th colspan="4">No of cases in 2022</th> <th rowspan="2">JKPP 8 submission</th> </tr> <tr> <th>Case</th> <th>LTI</th> <th>Non LTI</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>2</td> <td>40</td> <td>2</td> <td>4</td> <td>17/01/2023</td> </tr> </tbody> </table> <p>The mill had an accident on 27/09/2022 injured while riding motorcycle to workplace with LTI of 36 days. Another event dated 26/11/2022 workshop apprentice fell off a ladder while attending to boiler work. HIRARC revised to include pre-inspection and enhanced awareness. In general all major incidences were attended to with proper documents maintained to address root causes and prevention measures etc.</p>	No.	No of cases in 2022				JKPP 8 submission	Case	LTI	Non LTI	Total	1	2	40	2	4	17/01/2023	
No.	No of cases in 2022				JKPP 8 submission														
	Case	LTI	Non LTI	Total															
1	2	40	2	4	17/01/2023														
Criterion 4.4.5: Employment conditions																			
4.4.5.1	<p>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.</p> <p>- Major compliance -</p>	<p>Boustead Plantations Berhad established the Sustainability Policy; Signed by CEO updated 02/12/2021 to implement the good social practices regarding human rights in respect of industrial harmony.</p> <p>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.</p>	Complied																

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Criterion / Indicator		Assessment Findings	Compliance
4.4.5.2	<p>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.</p> <p>- Major compliance -</p>	<p>BPB Group established the Sustainability Policy; Signed by CEO updated 02/12/2021 to implement the good social practices regarding human rights in respect of industrial harmony.</p> <p>The company ensured all relevant parties will be treated equally and no discrimination based on race, caste, nationalities, religion, gender, age etc.</p> <p>Onsite interview conducted with the workers from different nationalities, gender and age confirmed that no discrimination practice by the management within Segaria Business Unit.</p>	Complied
4.4.5.3	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p>- Major compliance -</p>	<p>Management ensured that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements (CA). Collective agreement between MAPA/NUPW and member sighted latest in circular number 12/2019 dated 02/04/2019.</p> <p>As per Boustead Holdings Policy, collective agreement will be revised at frequency 3 years once and latest agreement is still under reviewed. Details of CA has been documented as following.</p> <ol style="list-style-type: none"> 1. MAPA/NUPW Agreement on the wages of harvesters, harvesting kanganies, loaders and "other loaders" on oil palm estates, 2019 2. MAPA/NUPW Agreement Palm Oil Mill Employees` Agreement, 2019 3. MAPA/NUPW Filed and other general employees and fringe benefits agreement, 2019. <p>Although these old agreements were expired in Dec 2021, the current adjustment to suit minimum wage of RM1,500 per month per employee was ensured by management for living wage sufficient to meet basic needs.</p> <p>Documentations of pay available in the form of Monthly Pay Slip and conditions as per Work Agreement Contract as per sample sighted as</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance																											
		<p>follow.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Passport / IC</th> <th>Designation</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>810427-xx-xxxx</td> <td>Boiler Attendant</td> </tr> <tr> <td>2.</td> <td>C 772xxxx</td> <td>Fitter/ Welder</td> </tr> <tr> <td>3.</td> <td>980829-xx-xxxx</td> <td>Boiler Fireman</td> </tr> <tr> <td>4.</td> <td>910224-xx-xxxx</td> <td>Steriliser Attendant</td> </tr> <tr> <td>5.</td> <td>860722-xx-xxxx</td> <td>Nut Plant Operator</td> </tr> <tr> <td>6.</td> <td>C 762xxxx</td> <td>Nut Plant Operator</td> </tr> <tr> <td>7.</td> <td>670613-xx-xxxx</td> <td>Nut Plant Operator</td> </tr> <tr> <td>8.</td> <td>010713-xx-xxxx</td> <td>Nut Plant Operator</td> </tr> </tbody> </table> <p>Employee ID: C 772xxxx Basic: Ave: 57.69 VLP: 230.76 OT: 81hours (876.17) Deduction: 0 Employer Contribution: 30.60 (SOCSCO) Review on the sampled employee payslip for passport ID No. C772xxxx, sighted the information such as wages for daily rated. Other's information includes shift allowance rest day overtime, SOCSCO (Employer contribution) and deduction.</p>	No.	Passport / IC	Designation	1.	810427-xx-xxxx	Boiler Attendant	2.	C 772xxxx	Fitter/ Welder	3.	980829-xx-xxxx	Boiler Fireman	4.	910224-xx-xxxx	Steriliser Attendant	5.	860722-xx-xxxx	Nut Plant Operator	6.	C 762xxxx	Nut Plant Operator	7.	670613-xx-xxxx	Nut Plant Operator	8.	010713-xx-xxxx	Nut Plant Operator	
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4.4.5.4	<p>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.</p> <p>- Minor compliance -</p>	<p>To ensure employees of contractors are paid based on legal or industry minimum standards, the management requests payslips from the contractors. Payslips of employees from several contractors of the sampled estate available for verification. Generally, the pays were found to be meeting the minimum standard requirements.</p>	Complied																											

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Criterion / Indicator		Assessment Findings	Compliance
		Segaria POM carried out most of the maintenance and repair work by their own technicians.	
4.4.5.5	The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. - Major compliance -	Segaria POM registered all the recruited workers in the Labour Registration Record where personal details such as name, nationality, next of kin, education standard, date of employed, job description, wage rate, and date of birth etc. were stated in the registration card.	Complied
4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records. - Major compliance -	BPB Group established New Recruitment Procedure, Rev:01, effectively on 02/2020. Foreign Workers Procedure, Rev.: 01, Issued no.: 01, dated 01/2016. The procedure is to ensure workers recruitment to identified workers that fit the needs on the jobs suit with Segaria POM operations. BPB Group established Foreign Workers Procedure, Rev:01, Issue: Jan 2016, dated 25/01/2016. The procedure is to ensure estate/mill follow the correct steps in employment of foreign workers as stipulated by the government agencies/state government. Review on the employment contracts sighted available for samples of own and contractor's employees, confirmed 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, overtime and etc. Onsite interview with workers informed they kept a copy of the employment contracts were acknowledged.	Complied
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. - Major compliance -	Segaria POM implement proper Thumb Print system as time recording attendance that makes working hours and overtime transparent through Electronic Timecard for both employees and employer.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.4.5.8	<p>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.</p> <p>- Major compliance -</p>	<p>Segaria POM implement proper Thumb Print system as time recording attendance that makes working hours and overtime transparent through Electronic Timecard Records.</p> <p>Reviewed on sampled workers' Electronic Timecard state the entry and exit time on the cards.</p> <p>Onsite interview with sampled workers informed working time and break time is according to employment contract. Overtime offered to workers is voluntarily upon mutually agreement between management and workers.</p>	Complied
4.4.5.9	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p>- Major compliance -</p>	<p>Segaria POM implement proper Thumb Print system as time recording attendance that makes working hours and overtime transparent through Electronic Timecard Records.</p> <p>Documented payslip distributed to all workers on the day of payment. Wages and overtime were paid according to the 'Electronic Timecard'. Total hours of overtime and daily attendance recorded on the timecard.</p> <p>Review on the sampled workers' payslip, the paid of task rate and overtime offer are state as according to the attendance sheet. Management kept copy the payslip and presented to auditor for review from the system. The sampled of workers' employment contract as the indicator 4.4.5.3 above.</p>	Complied
4.4.5.10	<p>Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings.</p> <p>- Minor compliance -</p>	<p>BPB Group through Segaria Business Unit management provided free medical facilities to all the workers and dependents in Segaria POM. Community Learning Centre available for the educational purpose especially to foreign workers' children from six (6) years old until 17 years old. Free treated water and electricity supplied to each of workers' housing units.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.4.5.11 In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.</p> <p>- Major compliance -</p>	<p>BPB Group provide to workers are provided with free housing facilities which includes potable water and electricity. Housing inspection by the medical assistants was also carried out on weekly basis which criteria is mainly focusing on cleanliness and safety. Records of inspection were well maintained for verification.</p> <p>Onsite visit at workers housing observed the amenities available include playground, football field, church, mosque, sundry shop and crèche were available at Segaria Estate.</p> <p>The workers quarters have adequate clean water supply by estate management, the management also done the analysis to ensure water was safe for domestic use.</p> <p>Document review on the workers housing inspection latest conducted on 04/02/2023, 11/02/2023, 12/02/2023 and 19/02/2023.</p> <p>Document review on the Visiting Medical Officer (VMO) visit report dated 04/02/2023 and 11/02/2023 by Dr. Nasib Sakiman; MMC #27286.</p>	<p>Complied</p>
<p>4.4.5.12 The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- Major compliance -</p>	<p>BPB Group maintained the current Anti-Harassment Policy Statement signed by CEO dated 01/03/2022.</p> <p>Objective of the policy is strictly prohibited harassment, as well as inappropriate or unwelcome behavior that, if left unchecked, could become severe or pervasive as to constitute harassment.</p> <p>Management established few social practices regarding human rights that provide guidelines to prevent all forms of sexual harassment and violence at the workplace under Social Policies in the company's website: https://www.bousteadplantations.com.my/sustainability-approach-policies/.</p> <p>Consultation made on-site with stakeholders confirmed no sexual harassment and violence occurred in the workplace.</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
		Document review, no sexual harassment complaints or grievance lodged as at audit.	
4.4.5.13	The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. - Major compliance -	Segaria Estate established 'Persatuan Pekerja Segaria (PPS)' which conducted on 06/12/2022. Management established few social practices regarding human rights that provide guidelines to prevent all forms of sexual harassment and violence at the workplace under Social Policies in the company's website: bargaining as the Freedom of Association Policy; Dated: 2/12/2019 under Social Policies: https://www.bousteadplantations.com.my/sustainability-approach-policies/	Complied
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 -	Management established few social practices regarding human rights that prevent employment of children and young persons as the Children employment and Minimum Age Policy; Dated: 2/12/2019: https://www.bousteadplantations.com.my/sustainability-approach-policies/ . Review of workers particulars and consultation with stakeholders confirmed that the company adopted 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.	Complied
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.	Segaria POM established training program are made on annual basis. It is subject for review during the financial year should need arises. These	Complied

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Criterion / Indicator		Assessment Findings				Compliance
	- Major compliance -	training are made to ensure employees are trained in their job and on to update on current development adopted by the organization.				
		No.	Date	Subject	Attendees	
		1	25/04/2022	RSPO/ MSPO Requirement	5	
		2	11/02/2022	FFB Grading Guidelines	5	
		3	12/09/2022	Mill Supervision Program	1	
		4	04/7/2022	OER improvement Program	5	
		5	03/10/2022	Noise Risk Assessment Hazard	Entire	
		6	10/11/2022	Water Management/ SW	2	
		7	18/03/2022	BPB Sustainability Awareness	5	
		8	23/06/2022	PPE Adherence	4	
		9	20/10/2022	Worker/ Employers Right	1	
		10	22/6/2022	Workshop Maintenance	5	
		11	03/8/2022	Accident Reporting JKPP 8	8	
		12	14/09/2022	AESP Refresher Program	4	
		13	24/06/2022	CePSWaM Certification Program	1	
		14	19/01/2022	Oil Purifier Maintenance	10	
		15	17/11/2022	Integrity Awareness	4	
		16	31/01/2022	Mill Production Report Dashboard	4	
		17	14/6/2022	ERP – Fire	Entire	
		18	07/07/2022	Security – SOP & HIRARC	5	
		19	09/11/2022	ILO Forced Labour	21	
		20	02/8/2022	PPE awareness/ adherence	7	
		21	21/02/2022	Water analysis SOP	10	
		22	05/11/2022	SW/ Waste Management	16	
		23	17/10/2022	Policies briefing and understanding	Entire	
		24	11/11/2022	Anti-Bribery Awareness	20	
25	29/02/2022	Ramp loading - SOP FFB quality	5			

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Criterion / Indicator		Assessment Findings				Compliance
		26	06/12/2022	SOP Supply chain/ Traceability	3	
		27	15/08/2022	Medical Surveillance	Entire	
		28	31/03/2022	Fume hood - Laboratory	7	
		29	21/02/2023	DOE Jadual Pematuhan Compliance	8	
		30	17/02/2022	ERP - Environment Sustainability	8	
		<p>Bulk of the mill training is organized during the daily briefing prior to work commencement of each shift. Mainly the issues discussed/ briefed were related to mill process operations and safety compliance.</p> <p>These training records are maintained in a separate book and were sighted during the audit.</p>				
4.4.6.2	<p>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.</p> <p>- Major compliance -</p>	<p>The training needs for the mill financial year 2023 training program has been established. The details of the training needs include categories of stations, subjects, and employees' group.</p> <p>Included in this program among others are subjects related to:</p> <ol style="list-style-type: none"> 1. Environmental/ safety & health policy 2. Scheduled waste management 3. Environmental responsibility, 4. HCV & Biodiversity training 5. Machine handling/ mill stations operations/ control of process parameters 6. Workshop management etc. 				Complied
4.4.6.3	<p>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.</p> <p>- Minor compliance -</p>	<p>The annual training program has been established and significantly covers all aspects of the MSPO requirements. There were also additional subjects including the mill operating procedures, parameters of mill produce, machinery maintenance etc. The training program also specified the target group of employees to be trained under the</p>				Complied

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Criterion / Indicator		Assessment Findings				Compliance																																																																																																																						
		<p>allocated subjects. The program mainly covers both requirement of the estates and mill in the Segaria BU. The subjects for the training are issued and assisted by the SSD personnel. The following topics included in the annual training program 2023 among others are extracted below:</p> <table border="1"> <thead> <tr> <th rowspan="2">No.</th> <th rowspan="2">Subjects</th> <th colspan="3">Month</th> </tr> <tr> <th>1-4</th> <th>5-8</th> <th>9-12</th> </tr> </thead> <tbody> <tr><td>1</td><td>AGTES/ another competency</td><td>/</td><td>/</td><td>/</td></tr> <tr><td>2</td><td>MSPO RSPO Supply chain Int Audit</td><td>/</td><td>-</td><td>-</td></tr> <tr><td>3</td><td>Noise conservation</td><td>-</td><td>-</td><td>/</td></tr> <tr><td>4</td><td>Policies briefing and awareness</td><td>/</td><td>-</td><td>-</td></tr> <tr><td>5</td><td>Fire Drill/ ERT</td><td>-</td><td>/</td><td>-</td></tr> <tr><td>6</td><td>First Aid Box guidelines</td><td>-</td><td>/</td><td>-</td></tr> <tr><td>7</td><td>Safe working procedure</td><td>/</td><td>/</td><td>/</td></tr> <tr><td>8</td><td>HIRARC</td><td>/</td><td>/</td><td>/</td></tr> <tr><td>9</td><td>FFB grading</td><td>/</td><td>-</td><td>-</td></tr> <tr><td>10</td><td>Health & Welfare</td><td>-</td><td>/</td><td>-</td></tr> <tr><td>11</td><td>MSPO RSPO awareness</td><td>-</td><td>/</td><td>-</td></tr> <tr><td>12</td><td>Scheduled waste management</td><td>-</td><td>/</td><td>-</td></tr> <tr><td>13</td><td>Weekly housing inspection</td><td>/</td><td>/</td><td>/</td></tr> <tr><td>14</td><td>Chemical spillage</td><td>-</td><td>/</td><td>-</td></tr> <tr><td>15</td><td>Palm GHG understanding</td><td>/</td><td>-</td><td>-</td></tr> <tr><td>16</td><td>Water management system</td><td>/</td><td>/</td><td>/</td></tr> <tr><td>17</td><td>EIA/ SIA understanding</td><td>/</td><td>-</td><td>-</td></tr> <tr><td>18</td><td>PPE awareness</td><td>/</td><td>/</td><td>/</td></tr> <tr><td>19</td><td>Safe work procedures</td><td>/</td><td>/</td><td>/</td></tr> <tr><td>20</td><td>Code of ethics & conduct</td><td>/</td><td>-</td><td>-</td></tr> <tr><td>21</td><td>Environmental Management Plan</td><td>/</td><td>-</td><td>-</td></tr> <tr><td>22</td><td>Working At Height</td><td>-</td><td>/</td><td>-</td></tr> </tbody> </table>				No.	Subjects	Month			1-4	5-8	9-12	1	AGTES/ another competency	/	/	/	2	MSPO RSPO Supply chain Int Audit	/	-	-	3	Noise conservation	-	-	/	4	Policies briefing and awareness	/	-	-	5	Fire Drill/ ERT	-	/	-	6	First Aid Box guidelines	-	/	-	7	Safe working procedure	/	/	/	8	HIRARC	/	/	/	9	FFB grading	/	-	-	10	Health & Welfare	-	/	-	11	MSPO RSPO awareness	-	/	-	12	Scheduled waste management	-	/	-	13	Weekly housing inspection	/	/	/	14	Chemical spillage	-	/	-	15	Palm GHG understanding	/	-	-	16	Water management system	/	/	/	17	EIA/ SIA understanding	/	-	-	18	PPE awareness	/	/	/	19	Safe work procedures	/	/	/	20	Code of ethics & conduct	/	-	-	21	Environmental Management Plan	/	-	-	22	Working At Height	-	/	-	
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		23	Laboratory Operations	-	/	-
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services						
Criterion 4.5.1: Environmental Management Plan						
4.5.1.1	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented. - Major compliance -	BPB Group maintained the current Environmental and Biodiversity Policy signed by CEO on 1207/2021. The policy describes company commitment to protecting the environment and conserving biodiversity through sustainable development. This is policy is prominently displayed in the office along with other Company's Policies.				Complied
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 -	a) BPB Group maintained the current Environmental and Biodiversity Policy signed by CEO on 1207/2021. The Policy is available, and the objectives stated therein. <ol style="list-style-type: none"> 1. Environmental protection and biodiversity sustainability 2. Compliance to legislative requirement 3. Management of environment 4. Management of slope area planting 5. Zero Burning and GHG management 6. Chemical management b) Environmental Impact Assessment 2023 updated on January 2023 compiled internally by the estate management and BPB HQ SSD Department. The environmental aspects and impact evaluation covers the following areas/activities. <ol style="list-style-type: none"> 1. Station operations form reception to dispatch 				Complied

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		2. Boiler operation 3. Power generation 4. Crude palm oil storage leakage and spillage 5. Effluent pond ruptured 6. Anaerobic process release of gas to atmosphere 7. Electrostatic Precipitator																
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored. - Major compliance -	The Continuous Management Plan 2023 for the mill operations among others include the following. <table border="1" data-bbox="1025 754 1865 922"> <thead> <tr> <th>No.</th> <th>Management Plan/ Objectives</th> <th>Action</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>ESP - Boiler Operation</td> <td>Commission in January 2022</td> </tr> <tr> <td>2</td> <td>Horizontal Deoiling Tank</td> <td>Installation in 2027</td> </tr> <tr> <td>3</td> <td>CPO Washing Tank</td> <td>Installation in 2022</td> </tr> <tr> <td></td> <td>Mill Roofing replacement</td> <td>Installation in 2026</td> </tr> </tbody> </table> All actions are to be monitored on the indicated frequency shown in the plan.	No.	Management Plan/ Objectives	Action	1	ESP - Boiler Operation	Commission in January 2022	2	Horizontal Deoiling Tank	Installation in 2027	3	CPO Washing Tank	Installation in 2022		Mill Roofing replacement	Installation in 2026	Complied
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3	CPO Washing Tank	Installation in 2022																
	Mill Roofing replacement	Installation in 2026																
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	This is available as elaborated in indicator 4.5.1.3 above. Improvement planned for both short and long terms are detailed along with the identified issues.	Complied															
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives. - Major compliance -	Segaria POM implement the training program for 2023 updated on a yearly basis in relation to the policy and objectives of the environmental management and improvement plans. Included in this program are subjects related to environment e.g. environmental, safety & health policy, scheduled waste management, environmental responsibility, HCV and Biodiversity training	Complied															

Criterion / Indicator		Assessment Findings					Compliance										
4.5.1.6	<p>The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.</p> <p>- Major compliance -</p>	<p>Segaria POM discussed environmental issues as part of agenda incorporated into safety & health meeting. The discussion disseminates into dialogue/ safety meeting/ briefing during muster.</p> <p>The forum used in quarterly OSH meeting and annual management review meeting. The latter emphasized more on issues on water management plan, electricity use, diesel consumption, waste management, SIA plan, renewable energy, aspect/ impact.</p> <p>Segaria POM established Environmental Performance Monitoring Committee (EPMC) to comply with the DOE requirement on Guidance Self-Regulation (GSR). The meeting it to review environmental performance within the POM incorporated in the EPMC meetings.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>1st</th> <th>2nd</th> <th>3rd</th> <th>4th</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>06/12/2022</td> <td>18/10/2022</td> <td>15/06/2022</td> <td>15/03/2022</td> </tr> </tbody> </table>					No.	1st	2nd	3rd	4th	1	06/12/2022	18/10/2022	15/06/2022	15/03/2022	Complied
No.	1st	2nd	3rd	4th													
1	06/12/2022	18/10/2022	15/06/2022	15/03/2022													
Criterion 4.5.2: Efficiency of energy use and use of renewable energy																	
4.5.2.1	<p>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</p> <p>- Major compliance -</p>	<p>Environmental Impact Assessment 2023 updated on January 2023 includes details of mitigation of the negative impacts.</p> <p>The monitoring is recorded in environment performance indicator-electricity generated by steam turbine tabulated for the financial year. It is calculated as electricity generated from turbine that produces power for the mill entire complex operation unit in kwh/mt FFB.</p> <p>Segaria POM established Energy Management Plan 2023 the mill aimed for reduction plan among others.</p> <p>Review the monthly record on energy consumption for both renewable and non-renewable sources, Segaria POM maintained and monitored to optimize use of renewable energy. The data is compiled for comparison</p>					Complied										

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Criterion / Indicator		Assessment Findings	Compliance																																																
		<p>and control for future improvement with aim of gradual reduction particularly diesel. Variation of ratio in the analysis were justified.</p> <ol style="list-style-type: none"> Educate workers on fuel saving practice Avoid leakages during vehicles maintenance. <p>The utilization of fossil fuel in 2022 is being monitored with records ratio diesel L/FFB mt shown below:</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Month</th> <th>Diesel /FFB</th> <th>No.</th> <th>Month</th> <th>Diesel /FFB</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>January</td> <td>5.01</td> <td>7</td> <td>July</td> <td>7.50</td> </tr> <tr> <td>2</td> <td>February</td> <td>6.26</td> <td>8</td> <td>August</td> <td>5.72</td> </tr> <tr> <td>3</td> <td>March</td> <td>5.68</td> <td>9</td> <td>September</td> <td>5.25</td> </tr> <tr> <td>4</td> <td>April</td> <td>6.84</td> <td>10</td> <td>October</td> <td>5.61</td> </tr> <tr> <td>5</td> <td>May</td> <td>6.45</td> <td>11</td> <td>November</td> <td>6.85</td> </tr> <tr> <td>6</td> <td>June</td> <td>7.57</td> <td>12</td> <td>December</td> <td>6.97</td> </tr> <tr> <td>-</td> <td>Baseline</td> <td>35,000.00 L</td> <td></td> <td>Total</td> <td>421,399.50</td> </tr> </tbody> </table> <p>Segaria POM maintained records and monitor the diesel utilization over the running hours of gen-set and other vehicles running. Performance variation in view of several factors i.e.</p> <ol style="list-style-type: none"> Infrastructure of estates Community size/ no of gen-sets No. of vehicles/ age of machine Weather interference/ crop production volume Crop diversion to another mill due to breakdown. 	No.	Month	Diesel /FFB	No.	Month	Diesel /FFB	1	January	5.01	7	July	7.50	2	February	6.26	8	August	5.72	3	March	5.68	9	September	5.25	4	April	6.84	10	October	5.61	5	May	6.45	11	November	6.85	6	June	7.57	12	December	6.97	-	Baseline	35,000.00 L		Total	421,399.50	
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-	Baseline	35,000.00 L		Total	421,399.50																																														
4.5.2.2	Palm oil millers shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations.	Segaria POM estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel in all transport and machinery operations was available in the year budget.	Complied																																																

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- Major compliance -																					
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	Segaria POM able to demonstrate reusable of fiber and shell as fuel feed into the boiler. Surplus quantity of shell and fiber are delivered to estate for multi purposes or sold to outside buyers. EFB generated from mill process dispatch to estate for mulching.	Complied																		
Criterion 4.5.3: Waste management and disposal																					
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	<p>Environmental Impact Assessment 2023 updated on January 2023 includes details of mitigation of the negative impacts.</p> <p>The source of generated from the mill process is the smoke from the boiler. It is monitored from the stack emission during the entire operations. These reports are reviewed by the mill and submitted to DOE. There was no major issue during the period of review.</p> <p>All waste and pollution are identified and documented in the Waste Management Plan for 2023. The waste generated from the mill operations as follow.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Waste</th> <th>Item</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td rowspan="3">1</td> <td rowspan="3">Scheduled Waste</td> <td>Spent lubricants/ hydraulic oil</td> <td>Workshop activities</td> </tr> <tr> <td>Used batteries/ used rags/ empty containers</td> <td>Workshop activities</td> </tr> <tr> <td>Hexane/ spent chemicals/ empty containers</td> <td>Laboratory and boiler station</td> </tr> <tr> <td rowspan="2">2</td> <td rowspan="2">Domestic Waste</td> <td>Rubbish</td> <td>Line site/ office & mill complex</td> </tr> <tr> <td>Sewage</td> <td>Line site/ office & mill complex</td> </tr> </tbody> </table>	No.	Waste	Item	Sources	1	Scheduled Waste	Spent lubricants/ hydraulic oil	Workshop activities	Used batteries/ used rags/ empty containers	Workshop activities	Hexane/ spent chemicals/ empty containers	Laboratory and boiler station	2	Domestic Waste	Rubbish	Line site/ office & mill complex	Sewage	Line site/ office & mill complex	Complied
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Criterion / Indicator		Assessment Findings				Compliance																																					
		3	Industrial Waste	POME	Effluent Treatment Plant																																						
				EFB	EFB station																																						
4.5.3.2	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <p>a) Identifying and monitoring sources of waste and pollution.</p> <p>b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p>- Major compliance -</p>	<p>a) Segaria POM established the Waste and Pollution Management Plan 2023 as shown below. Identifying and monitoring sources of waste and pollution. The PIC and time frame was also shown in the management plan.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Activities</th> <th>Source</th> <th>Waste/ Pollution</th> <th>Affected Environment</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>General store</td> <td>Petrol oil, lubricant Chemical</td> <td>Spillage & contamination</td> <td>Land, water</td> </tr> <tr> <td>2</td> <td>Scheduled Waste store</td> <td>Scheduled waste</td> <td>All type of SW</td> <td>Environmental</td> </tr> <tr> <td rowspan="2">3</td> <td rowspan="2">Office</td> <td>Domestic/ office waste</td> <td>Paper plastic</td> <td rowspan="2">Land, water</td> </tr> <tr> <td>Toilet & kitchen</td> <td>Sewage</td> </tr> <tr> <td rowspan="3">4</td> <td rowspan="3">Workshop</td> <td>Used oil & grease</td> <td>Spillage</td> <td rowspan="3">Recycled</td> </tr> <tr> <td>Metal waste</td> <td rowspan="2">Wastage</td> </tr> <tr> <td>Oil drum/ tank</td> </tr> <tr> <td rowspan="2">5</td> <td rowspan="2">Labour line</td> <td>Domestic waste</td> <td>Solid waste</td> <td rowspan="2">Land, water</td> </tr> <tr> <td>Toilet/ kitchen waste</td> <td>Sewage</td> </tr> </tbody> </table>				No.	Activities	Source	Waste/ Pollution	Affected Environment	1	General store	Petrol oil, lubricant Chemical	Spillage & contamination	Land, water	2	Scheduled Waste store	Scheduled waste	All type of SW	Environmental	3	Office	Domestic/ office waste	Paper plastic	Land, water	Toilet & kitchen	Sewage	4	Workshop	Used oil & grease	Spillage	Recycled	Metal waste	Wastage	Oil drum/ tank	5	Labour line	Domestic waste	Solid waste	Land, water	Toilet/ kitchen waste	Sewage	Complied
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Criterion / Indicator		Assessment Findings				Compliance																											
		b) Segaria POM identify the efficiency of source of resource for utilization and recycling of potential wastes as nutrients or converting them into value-added by-products as follow.																															
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Criterion / Indicator		Assessment Findings						Compliance																																				
		5	Labour line	Toilet & kitchen waste	Ensure no accidental spillage	Cease using facilities in event of non-functional																																						
4.5.3.3	<p>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</p> <p>- Major compliance -</p>	<p>BPB Group maintained the current SOP on Scheduled Waste Management dated June 2017.</p> <p>The inventory of the waste generated is recorded using the "E-SWISS" inventory only system.</p> <p>Document review of all scheduled waste generated disposed to Lagenda Bumimas Sdn Bhd with license no.003440 valid until 30/4/2023.</p> <p>Scheduled waste disposal details as follow.</p> <table border="1"> <thead> <tr> <th rowspan="2">No.</th> <th rowspan="2">Date</th> <th colspan="6">Metric Ton</th> </tr> <tr> <th>SW 410</th> <th>SW 306</th> <th>SW 102</th> <th>SW 322</th> <th>SW 109</th> <th>SW 305</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>13/02/2022</td> <td>0.180</td> <td>0.340</td> <td>0.204</td> <td>0.060</td> <td>0.019</td> <td>0.560</td> </tr> <tr> <td>2</td> <td>26/07/2022</td> <td>0.210</td> <td>0.009</td> <td>0.033</td> <td>0.070</td> <td>0.018</td> <td>0.050</td> </tr> </tbody> </table> <p>Onsite visit to the respective landfill area will be verified in the forthcoming site audit. All domestic waste generated from workers quarters was disposed in respective land fill for the estate. The landfills were located away i.e. about 1km from water sources.</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Site</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Segaria</td> <td>PM99B</td> <td>Collection two or three times per week</td> </tr> </tbody> </table>						No.	Date	Metric Ton						SW 410	SW 306	SW 102	SW 322	SW 109	SW 305	1	13/02/2022	0.180	0.340	0.204	0.060	0.019	0.560	2	26/07/2022	0.210	0.009	0.033	0.070	0.018	0.050	Estate	Site	Remarks	Segaria	PM99B	Collection two or three times per week	Complied
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4.5.3.4	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.</p> <p>- Minor compliance -</p>	<p>BPB Group maintained the current SOP on Scheduled Waste Management dated June 2017.</p> <p>Onsite visit to the respective landfill area will be verified in the forthcoming site audit. All domestic waste generated from workers quarters was disposed in respective land fill for the estate. The landfills were located away i.e. about 1km from water sources.</p>						Complied																																				

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		The risk of contamination has been minimized through this system.									
		Estate	Site	Remarks							
		Segaria	PM99B	Collection two or three times per week							
Criterion 4.5.4: Reduction of pollution and emission including greenhouse gas											
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	<p>Environmental Impact Assessment 2023 updated on January 2023 includes details of mitigation of the negative impacts.</p> <p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate/ soot emissions and effluent.</p> <p>Segaria POM continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records which covers estates and mill activities/ operation.</p> <p>Segaria POM established Pollution Identification Environmental Improvement Action Plan updated in January 2023 is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly.</p> <p>Among others the significant environmental aspect for estate operations as follow.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Environmental Aspect</th> <th>Source</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Air emissions from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).</td> </tr> </tbody> </table>			No.	Environmental Aspect	Source	1	Air	Air emissions from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).	Complied
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Criterion / Indicator		Assessment Findings		Compliance
		2	Water Water discharges – Cleaning water/ run-off/ process station waters (hydro cyclone/ sterilizer condensate/ clarification waste) & boiler quenching water and blow down	
		3	Land Land – Scheduled waste, domestic waste and industrial/ process waste. Clinical wastes – generated from clinics.	
		<ol style="list-style-type: none"> 1. Segaria POM monitor boiler through stack sampling for each of the boiler stack. Results were within the acceptable limit. The mill was also equipped with a Continuous Emission Monitoring System (CEMS). The audit team has verified the condition of the CEMS was found to be in functional condition. Data from the stack is connected online to DOE’s office. Boiler smoke emission data are within the DOE limit. 2. Scheduled waste generated disposed to Lagenda Bumimas Sdn Bhd with license no.003440 valid until 30/4/2023. 3. Domestic wastes are disposed to respective landfill areas as indicated in 4.5.3.4 above at designated area located far from housing complexes and waterways for Segaria POM. 4. Full compliance to zero burning practice 		
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	<p>Segaria POM established Pollution Identification Environmental Improvement Action Plan updated in January 2023 includes with reduction of Green House Gaseous (GHG) emission. Mitigation plan, actions and time frame has been identified.</p> <p>Based on the action plan, Segaria POM plan to reduce emission from POME. Currently, Segaria POM implement the technology used for de-watering operation. The technology is to facilitate the reduction in BOD</p>		Complied

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		<p>and suspended solids from the final effluent pond. All efforts and action plan for the identified pollutants and emission above is adequate to comply with the requirement. All identified issues have significant impacts to the environment as follow.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Issues & Strategies</th> <th colspan="2">Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Reduce diesel consumption at mill operation</td> <td colspan="2">To monitor diesel usage To ensure vehicle scheduled maintenance Optimum gen set usage</td> </tr> <tr> <td>2</td> <td>Reduce smoke emission to the air</td> <td colspan="2">To effectively implement the CEMS Eliminate use of wet shell as fuel</td> </tr> <tr> <td>3</td> <td>Reduce electricity usage</td> <td colspan="2">Monitor usage vs baseline Install capacitor at identified large power consumption motor Install solar panel & led bulb for the lighting system</td> </tr> </tbody> </table>				No.	Issues & Strategies	Action Plan		1	Reduce diesel consumption at mill operation	To monitor diesel usage To ensure vehicle scheduled maintenance Optimum gen set usage		2	Reduce smoke emission to the air	To effectively implement the CEMS Eliminate use of wet shell as fuel		3	Reduce electricity usage	Monitor usage vs baseline Install capacitor at identified large power consumption motor Install solar panel & led bulb for the lighting system		
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4.5.4.3	<p>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.</p> <p>- Major compliance -</p>	<p>Segaria POM had been issued with Written Permission for effluent discharge with license no. 003471 and validity until 30/06/2023 from DOE.</p> <p>Segaria POM operate with capacity of 30mt/hr. Currently, Segaria POM implement land application into Segaria Estate’s field No. PM 01B, Block 20 and Block 21P.</p> <p>Review on the land application report, sighted quarterly report has been submitted to DOE with latest submission in December 2022 with result as follow.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Oct - Dec 22</th> <th>STD</th> <th>13/12/2022</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH</td> <td>5-9</td> <td>8.30</td> </tr> <tr> <td>2</td> <td>BOD mg/l</td> <td>50</td> <td>18.40</td> </tr> <tr> <td>3</td> <td>Oil & Grease</td> <td>20</td> <td>0.00</td> </tr> </tbody> </table>				No.	Oct - Dec 22	STD	13/12/2022	1	pH	5-9	8.30	2	BOD mg/l	50	18.40	3	Oil & Grease	20	0.00	Complied
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Criterion / Indicator		Assessment Findings						Compliance
Criterion 4.5.5: Natural water resources								
4.5.5.1	<p>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:</p> <ul style="list-style-type: none"> 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. 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.). <p>- Major compliance -</p>	<ul style="list-style-type: none"> a) Segaria POM established Water Management Plan for for Year 2023 updated on 02/02/2023. b) Review on the was developed to maintain the quality and availability of natural water resources by practicing efficient water consumption through various methods such as: <ul style="list-style-type: none"> 1. Implementation of Rainwater Harvesting 2. Construction of bunds for effective management of collection/ main drain 3. Proper cambering of roads 4. Construct side drains in field roads 5. L-shaped frond stacking 6. Enhancement of ground vegetation at bare ground area. 7. Riparian Buffer Zone 8. Water Quality Monitoring /Rainfall data 9. Rainwater harvest RWH and construction of silt pits of dimensions (1m x 2m x 3m depth) in the fields. Both practices are to trap rainwater to maximise moisture benefits to the palm trees. 10. Identification and management of wastewater. c) In the Water Management Plan, the CU has also identified actions to be taken in the event of water supply shortage, as the estates reply on the rainwater and owned water catchment. for the domestic consumption. Water consumption for the mill process as follow. 						Complied
		No.	Month	Water/ FFB	No.	Month	Water/ FFB	

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Criterion / Indicator		Assessment Findings						Compliance																		
		1	January	0.60	7	July	0.44																			
		2	February	0.66	8	August	0.61																			
		3	March	0.65	9	September	0.62																			
		4	April	0.60	10	October	0.55																			
		5	May	0.48	11	November	0.17																			
		6	June	0.56	12	December	0.82																			
		-	-	-		Total	37,909.58 m3																			
		<p>Segaria POM takes samples from two (2) points of Sg Segarong monthly at upstream and downstream of the rivers for detection of pollution monthly. Management plan includes with</p> <ol style="list-style-type: none"> 1. Regular inspection at buffer/HCV areas 2. Monitor water from surrounding areas 3. Track, measure and report all activities around river 4. Train and educate workers. <p>The management concludes that the water quality is acceptable and does not create major impact to the water system.</p> <p>In addition Segaria POM samples at the following points for the monitoring of water prior and after treatment for consumption in both estates/mill housing complexes. Parameter checked among others as shown below compared against the drinking quality standard. Analysis made by Dynakey Laboratories Sdn Bhd Sandakan as appointed by the Company.</p> <p>Below is the parameter to monitor water from sampling.</p> <ol style="list-style-type: none"> 1. Domestic water parameter. 																								
		<table border="1"> <thead> <tr> <th>No.</th> <th>Parameter</th> <th>Standard</th> <th>No.</th> <th>Parameter</th> <th>Standard</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PH</td> <td>5-6</td> <td>4</td> <td>S Solids</td> <td>50-150</td> </tr> <tr> <td>2</td> <td>BOD</td> <td>3-6</td> <td>5</td> <td>A nitrogen</td> <td>0.3-0.9</td> </tr> </tbody> </table>							No.	Parameter	Standard	No.	Parameter	Standard	1	PH	5-6	4	S Solids	50-150	2	BOD	3-6	5	A nitrogen	0.3-0.9
No.	Parameter	Standard	No.	Parameter	Standard																					
1	PH	5-6	4	S Solids	50-150																					
2	BOD	3-6	5	A nitrogen	0.3-0.9																					

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Criterion / Indicator		Assessment Findings						Compliance
		3	COD	23-30	6	Nitrogen	-	
		2. Drinking water parameter.						
		No.	Parameter	Catchment Pond	Water Dam	Storage tank	Housing 4 complexes	
			Frequency	2x	2x	2x	2x	
		1	PH	/	/	/	/	
		2	Turbidity	/	/	/	/	
		3	Aluminium	/	/	/	/	
		4	Chlorine	/	/	/	/	
		5	A Nitrogen	/	/	/	/	
		6	Fluoride	/	/	/	/	
		7	Coli form	/	/	/	/	
		8	E coli	/	/	/	/	
		All results conform to the specification against the following standards.						
		No.	Parameter	Unit	Regulation raw water	Standard drinking water		
		1	PH	-	5.5-9.0	7.3		
		2	Chlorine	mg/L	-	0.9		
		3	Coli form	mg/L	5000	<10		
		4	E coli	MPN/ml	5000	<10		
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 -	Segaria POM had been issued with Written Permission for effluent discharge with license no. 003471 and validity until 30/06/2023 from DOE. Segaria POM operate with capacity of 30mt/hr. Currently, Segaria POM implement land application into Segaria Estate’s field No. PM 01B, Block 20 and Block 21P.						Complied

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Criterion / Indicator		Assessment Findings	Compliance																
		Review on the land application report, sighted quarterly report has been submitted to DOE with latest submission in December 2022 with result as follow: <table border="1" data-bbox="1025 534 1713 670"> <thead> <tr> <th>No.</th> <th>Oct - Dec 22</th> <th>STD</th> <th>13/12/2022</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH</td> <td>5-9</td> <td>8.30</td> </tr> <tr> <td>2</td> <td>BOD mg/l</td> <td>50</td> <td>18.40</td> </tr> <tr> <td>3</td> <td>Oil & Grease</td> <td>20</td> <td>0.00</td> </tr> </tbody> </table>	No.	Oct - Dec 22	STD	13/12/2022	1	pH	5-9	8.30	2	BOD mg/l	50	18.40	3	Oil & Grease	20	0.00	
No.	Oct - Dec 22	STD	13/12/2022																
1	pH	5-9	8.30																
2	BOD mg/l	50	18.40																
3	Oil & Grease	20	0.00																
4.6 Principle 6: Best Practices																			
Criterion 4.6.1: Mill Management																			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	BPB Group maintained the current Quality Assurance Manual (QAM, Rev:01, Date:2/11/09), Mill operation Manual (MOM, Issue 2, Date: June 2002) and Standard Operating Procedure for mills operation 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, powerhouse and water treatment plant. Work Instructions were derived from SOPs, and it were displayed at workstations at the mill and at certain locations at the estates, such as the Muster Notice Boards. E.g.: WI Boiler Station, WI Sterilizer Station, WI Oil Room, WI Press Station etc.	Complied																
4.6.1.2	All palm oil mills shall implement best practices. - Major compliance -	Segaria POM implement the current Quality Assurance Manual and Work Instruction with no changes. Sighted Internal Audit report, which was conducted once a year by Sustainability section, the internal audit was conducted on 14-17/12/2021 to cover the entire criterion stated in the standard and SOP.	Complied																

Criterion / Indicator		Assessment Findings	Compliance																														
Criterion 4.6.2: Economic and financial viability plan																																	
4.6.2.1	<p>A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.</p> <p>- Major compliance -</p>	<p>Segaria POM continued to achieve long term economic and financial viability through documented management plan projected to year 2027. Since there are no smallholders in this Business Unit, therefore a business case for scheme smallholders is not considered.</p> <ol style="list-style-type: none"> 1. A Management Plan including crop forecast, capital expenditure, operational expenditure, general charges, profit and loss covering the period of 2023 to 2027 had been prepared for the mill and made available to the audit team. 2. The component of the budget comprises of the following items. <ul style="list-style-type: none"> • Labour statement/ Allocation of wages • Labour benefit summary/ Labour reconciliation • Summary of vehicle and running schedule • Job allocation for vehicles/ Summary of workshop running schedule • Summary if budget/ Summary of general charges • CAPEX among others replacement/ upgrading of building/machinery, workers amenities for the mill. 3. Format of mill summary expenditure is as per the following content. Figures were extracted out for reason of confidentiality. <table border="1"> <thead> <tr> <th>Year</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> </tr> </thead> <tbody> <tr> <td>FFB processed</td> <td>87,000</td> <td>89,000</td> <td>90,200</td> <td>89,500</td> <td>88,300</td> </tr> <tr> <td>OER</td> <td>23.00</td> <td>23.00</td> <td>23.00</td> <td>23.00</td> <td>23.00</td> </tr> <tr> <td>KER</td> <td>3.50</td> <td>3.50</td> <td>3.50</td> <td>3.50</td> <td>3.50</td> </tr> <tr> <td>Gen charges</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> </tbody> </table>	Year	2023	2024	2025	2026	2027	FFB processed	87,000	89,000	90,200	89,500	88,300	OER	23.00	23.00	23.00	23.00	23.00	KER	3.50	3.50	3.50	3.50	3.50	Gen charges	X	X	X	X	X	Complied
Year	2023	2024	2025	2026	2027																												
FFB processed	87,000	89,000	90,200	89,500	88,300																												
OER	23.00	23.00	23.00	23.00	23.00																												
KER	3.50	3.50	3.50	3.50	3.50																												
Gen charges	X	X	X	X	X																												

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Criterion / Indicator		Assessment Findings					Compliance	
		Processing	X	X	X	X	X	
		Depreciation	X	X	X	X	X	
		Despatch	X	X	X	X	X	
Criterion 4.6.3: Transparent and fair price dealing								
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	<p>BPB Group HQ management practice to conduct tender and monitor pricing mechanism in Sabah Region Office includes endorsement of the projects are tendered from the approved vendors registered and payments through system named PIMACS. The contract includes the descriptions of Details is described in clause no 3 - Remuneration and Clause 13 Application of transportation rates and quantity.</p> <p>This is available in the guidelines LOA (limit of authority) and revised sourcing method for plantation procurement.</p> <p>Upon end of the month, Segaria POM management will verify the completion of job and acknowledged by vendors' representatives.</p> <p>To date no complaints were received from the vendor/supplier on issues relating to pricing and timing of payment.</p>					Complied	
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	<p>Segaria POM manage all contracts and purchases documented includes of purchase orders and invoices signed by both vendor and mill representatives. The contract includes descriptions as follow.</p> <ol style="list-style-type: none"> 1. Clause 11, Contractors to comply with laws Compliance to Occupational Safety and Health Act 1994/EQA 1974 2. Clause 1.1a, Compliance to requirement labour and personnel 3. Clause 9 a & e, Company and certification body audits 4. Clause 8, Providing contractor's responsibilities. <p>Example sampled of contract agreement as follow.</p>					Complied	

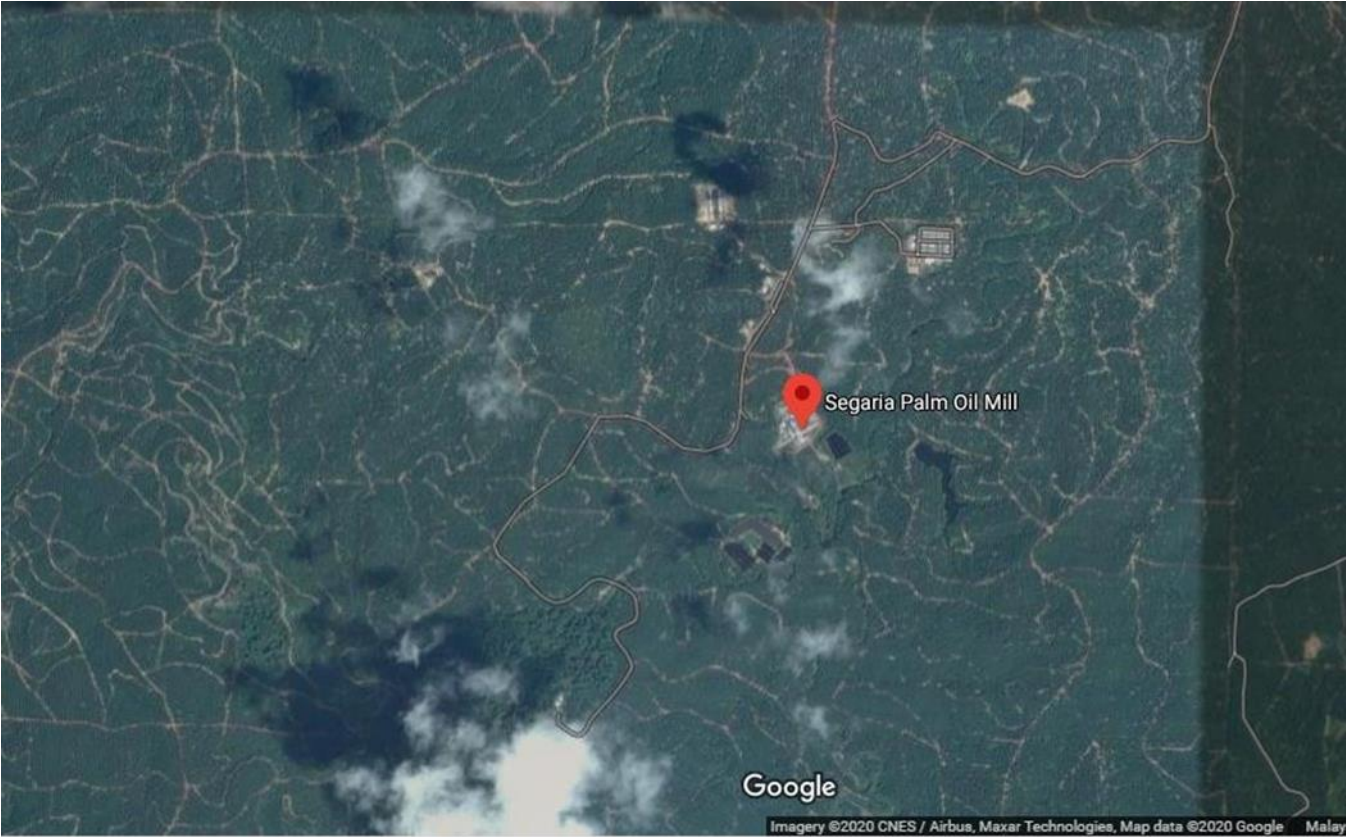
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Criterion / Indicator		Assessment Findings				Compliance												
		No.	Contractor/ Vendor	Work description	Validity													
		1	Yee Ping Trading	CPO/ CPK Transportation	31/12/23													
		2	Pengangkutan Dagang Tera	CPO/ CPK Transportation	31/12/23													
Criterion 4.6.4: Contractor																		
4.6.4.1	<p>In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.</p> <p>- Major compliance -</p>	<p>Segaria POM manage all contracts which is includes the requirement been specified and explained during the MSPO training and briefing session during the stakeholders meeting on 27/10/2022 which includes the presence of Contractors and vendors total at eight (8) representatives.</p> <p>All Contractors/ Vendors need to follow MSPO guideline in accordance with the BPB Group company procedures. In addition, contract has specified the following revised requirement.</p> <p>a) Clause 9.0.a - e1.5 Company and certification body audits</p> <p>The contractor shall upon request by the Company allow certification bodies access to audit the Contractors premise or operations if deemed necessary.</p>				Complied												
4.6.4.2	<p>The management shall provide evidence of agreed contracts with the contractor.</p> <p>- Major compliance -</p>	<p>Segaria POM manage all contracts/agreement/purchase orders established by BPB Group with standard format content of which are variable subject to the type/nature of work to be executed.</p> <p>All contracts are signed by both mill management and contractors indicating agreement of the terms and conditions therein.</p> <p>Example sampled of contract agreement as follow.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>No.</th> <th>Contractor/ Vendor</th> <th>Work description</th> <th>Validity</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Yee Ping Trading</td> <td>CPO/ CPK Transportation</td> <td>31/12/23</td> </tr> <tr> <td>2</td> <td>Pengangkutan Dagang Tera</td> <td>CPO/ CPK Transportation</td> <td>31/12/23</td> </tr> </tbody> </table>				No.	Contractor/ Vendor	Work description	Validity	1	Yee Ping Trading	CPO/ CPK Transportation	31/12/23	2	Pengangkutan Dagang Tera	CPO/ CPK Transportation	31/12/23	Complied
No.	Contractor/ Vendor	Work description	Validity															
1	Yee Ping Trading	CPO/ CPK Transportation	31/12/23															
2	Pengangkutan Dagang Tera	CPO/ CPK Transportation	31/12/23															

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Criterion / Indicator		Assessment Findings	Compliance
4.6.4.3	<p>The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.</p> <p>- Minor compliance -</p>	<p>Segaria POM manage all contracts which is includes the requirement been specified and explained during the MSPO training and briefing session during the stakeholders meeting on 27/10/2022 which includes the presence of Contractors and vendors total at eight (8) representatives.</p> <p>All Contractors/Vendors need to follow MSPO guideline in accordance with the BPB Group company procedures. In addition, contract has specified the following revised requirement.</p> <p>a) Clause 9.0 a – e1.5 Company and certification body audits The contractor shall upon request by the Company allow certification bodies access to audit the Contractors premise or operations if deemed necessary.</p>	Complied

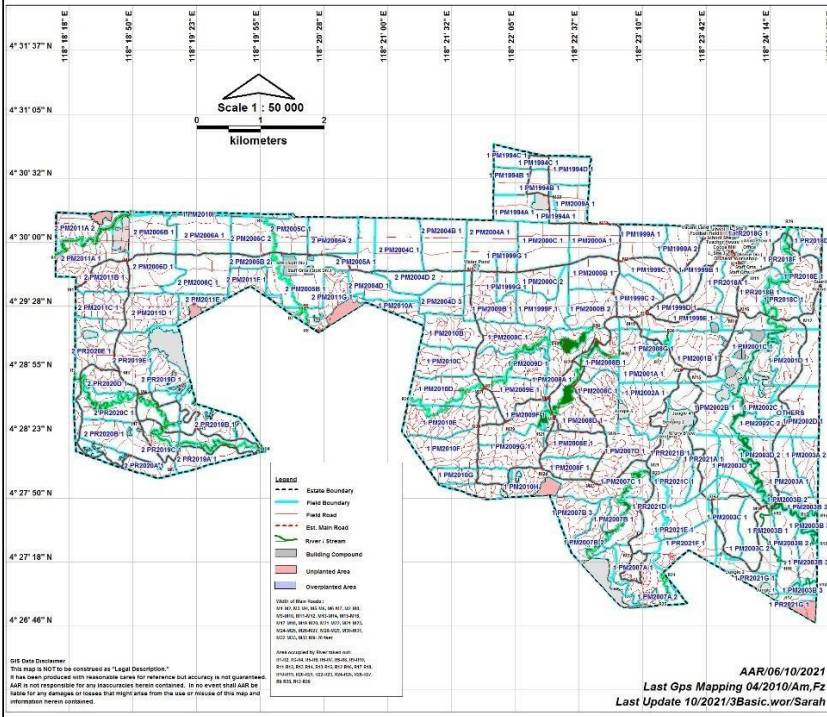
Appendix C: Location and Field Map



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**SEGARIA ESTATE
Home Division**

Total Planted Area : 4465.1 ha



Blk_No	Plntg_Material	Est_Ha	Adt_Ha	Hs	Blk_No	Plntg_Material	Est_Ha	Adt_Ha	Hs
1 PR19944	Dhp Hsu	38.4	38.46	38.4	1 PR20018	K AA	18.3	18.22	18.3
1 PR19948	Dhp Fda	36.1	36.13	36.1	1 PR20118	K AA	43.6	42.73	43.6
1 PR19941	Dhp Fda	23.9	23.86	23.9	1 PR20119	K AA	43.4	42.20	43.4
1 PR19942	Dhp Fda	28.3	28.24	28.3	1 PR20120	K AA	48.6	48.31	48.6
1 PR19981	K AA	33.4	36.60	33.4	1 PR20121	K AA	51.1	51.58	51.1
1 PR19982	K AA	38.9	32.42	38.9	1 PR20122	K AA	68.6	61.84	68.6
1 PR19983	K AA	28.9	29.21	28.9	1 PR20123	K AA	29.0	29.25	29.0
1 PR19984	K AA	38.9	38.85	38.9	1 PR20124	K AA	38.1	37.51	38.1
1 PR19985	K AA	30.4	30.41	30.4	1 PR20125	K AA	11.4	11.27	11.4
1 PR19986	K AA	46.8	45.77	46.8	1 PR20126	K AA	31.0	31.04	31.0
1 PR19987	K AA	35.3	35.27	35.3	1 PR20127	K AA	48.8	46.47	48.8
1 PR19988	K AA	47.8	47.86	47.8	1 PR20128	K AA	41.7	38.86	41.7
1 PR19989	K AA	29.8	29.82	29.8	1 PR20129	K AA	15.1	15.14	15.1
1 PR20001	Dhp AA	42.6	42.62	42.6	1 PR20130	K AA	48.9	46.40	48.9
1 PR20002	Dhp AA	36.9	36.96	36.9	1 PR20131	K AA	38.2	38.16	38.2
1 PR20003	Dhp AA	46.6	46.55	46.6	1 PR20132	K AA	15.8	15.83	15.8
1 PR20004	Dhp AA	67.8	67.83	67.8	1 PR20133	K AA	36.1	36.06	36.1
1 PR20005	Dhp AA	28.6	28.60	28.6	1 PR20134	K AA	29.3	29.31	29.3
1 PR20011	Dhp AA	67.7	67.72	67.7	1 PR20135	K AA	29.1	29.06	29.1
1 PR20012	Dhp AA	69.8	69.86	69.8	1 PR20136	Dhp AA	36.2	36.24	36.2
1 PR20013	Dhp AA	61.7	61.70	61.7	1 PR20137	Dhp AA	38.6	38.64	38.6
1 PR20014	Dhp AA	69.2	69.24	69.2	1 PR20138	Dhp AA	42.6	42.49	42.6
1 PR20021	Dhp AA	55.5	55.47	55.5	1 PR20139	Dhp AA	39.6	39.64	39.6
1 PR20028	K AA	62.6	62.48	62.6	1 PR20041	K AA	64.3	64.28	64.3
1 PR20029	K AA	29.2	29.24	29.2	1 PR20042	K AA	56.2	56.24	56.2
1 PR20032	K AA	38.8	38.79	38.8	1 PR20043	K AA	65.9	65.91	65.9
1 PR20033	K AA	48.2	48.16	48.2	1 PR20044	K AA	39.7	39.72	39.7
1 PR20034	Dhp AA	33.8	33.77	33.8	1 PR20045	K AA	34.4	34.38	34.4
1 PR20035	Dhp AA	37.9	37.91	37.9	1 PR20046	K AA	38.4	38.37	38.4
1 PR20038	K AA	36.8	36.59	36.8	1 PR20051	K AA	27.6	27.64	27.6
1 PR20039	Dhp AA	47.7	47.65	47.7	1 PR20052	K AA	48.8	48.46	48.8
1 PR20043	K AA	43.8	43.84	43.8	1 PR20053	K AA	47.6	47.60	47.6
1 PR20044	K AA	49.9	49.95	49.9	1 PR20054	K AA	32.2	32.22	32.2
1 PR20045	K AA	28.4	28.46	28.4	1 PR20055	K AA	39.6	39.47	39.6
1 PR20046	Dhp AA	33.3	33.28	33.3	1 PR20056	K AA	38.1	38.14	38.1
1 PR20047	Dhp AA	22.3	22.34	22.3	1 PR20061	K AA	63.0	63.98	63.0
1 PR20051	K AA	61.8	61.89	61.8	1 PR20062	K AA	44.3	44.31	44.3
1 PR20052	K AA	24.6	24.64	24.6	1 PR20063	K AA	64.0	63.98	64.0
1 PR20053	K AA	35.8	35.82	35.8	1 PR20064	K AA	43.0	43.02	43.0
1 PR20054	K AA	29.7	29.68	29.7	1 PR20065	K AA	51.8	51.48	51.8
1 PR20055	K AA	33.8	33.48	33.8	1 PR20066	K AA	33.6	33.49	33.6
1 PR20056	K AA	63.1	63.06	63.1	1 PR20067	K AA	31.2	29.89	31.2
1 PR20057	K AA	63.8	63.91	63.8	1 PR20068	K AA	37.4	38.14	37.4
1 PR20058	K AA	42.8	42.74	42.8	1 PR20069	K AA	46.7	46.50	46.7
1 PR20059	K AA	29.2	29.21	29.2	1 PR20071	K AA	18.6	18.74	18.6
1 PR20060	K AA	43.6	43.64	43.6	1 PR20072	K AA	33.8	33.82	33.8
1 PR20061	K AA	48.7	48.75	48.7	1 PR20073	K AA	38.6	38.51	38.6
1 PR20062	K AA	28.9	28.88	28.9	1 PR20074	K AA	47.8	47.78	47.8
1 PR20063	K AA	28.9	28.96	28.9	1 PR20075	K AA	47.2	47.20	47.2
1 PR20064	K AA	19.9	19.92	19.9	1 PR20076	K AA	51.6	51.56	51.6
1 PR20065	K AA	22.3	22.29	22.3	1 PR20077	K AA	33.2	33.23	33.2
1 PR20066	K AA	22.6	22.61	22.6	1 PR20078	K AA	43.8	43.75	43.8
1 PR20067	K AA	45.6	45.60	45.6	1 PR20079	K AA	33.6	33.64	33.6
1 PR20068	K AA	45.6	45.41	45.6	1 PR20081	K AA	34.0	34.06	34.0
1 PR20069	K AA	46.5	46.50	46.5	1 PR20082	K AA	38.3	38.29	38.3
1 PR20070	K AA	44.8	44.84	44.8	1 PR20083	K AA	24.4	24.43	24.4
1 PR20071	K AA	65.1	65.06	65.1	1 PR20084	K AA	48.0	48.02	48.0

Remarks.

- Est_ha = Current block area records
- Adt_ha = Block area computed with GPS/GIS
- Hs = Block areas proposed for adoption.
- *Coordinate Readings in (WGS_84)

AAR/06/10/2021
Last Gps Mapping 04/2010/Am,Fz
Last Update 10/2021/3Basic.wor/Sarah

Appendix D: List of Abbreviations

BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MSPO	Malaysian Sustainable Palm Oil
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RTE	Rare, Threatened or Endangered species
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
BPB	Boustead Plantations Berhad