

**RSPO PRINCIPLE AND CRITERIA –
Recertification Assessment (RC_2)
Public Summary Report**

| |
|---|
| Kulim (Malaysia) Berhad |
| Client company address: Kulim (Malaysia) Berhad K.B 705 80990 Johor Bahru Johor, Malaysia |
| Certification Unit: Sindora Palm Oil Mill and supply base Location of Certification Unit: KB 501 86009 Kluang, Johor, Malaysia |

| TABLE of CONTENTS | Page No |
|--|----------------|
| Section 1: Scope of the Certification Assessment..... | 4 |
| 1. Company Details | 4 |
| 2. Certification Information | 4 |
| 3. Other Certifications..... | 4 |
| 4. Location(s) of Mill & Supply Bases | 5 |
| 5. Description of Supply Base | 5 |
| 6. Plantings & Cycle | 5 |
| 7. Certified Tonnage of FFB (Own Certified Scope) | 5 |
| 8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *..... | 6 |
| 9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable | 6 |
| 10. Certified Tonnage | 7 |
| 11. Actual Sold Volume (CPO) | 7 |
| 12. Actual Sold Volume (PK) | 7 |
| 13. Actual Group certification Claims | 7 |
| Section 2: Assessment Process | 8 |
| 2.1 Assessment Methodology, Programme, Site Visits..... | 8 |
| 2.3 Assessment Plan | 11 |
| Section 3: Assessment Findings | 14 |
| 3.1 Normative requirement applied for this assessment:..... | 14 |
| 3.2 Time Bound Plan progress for multiple management units | 14 |
| 3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment) | 16 |
| 3.4 Details of findings | 17 |
| 3.4.1 Status of Nonconformities Previously Identified and Observations | 21 |
| 3.4.2 Summary of the Nonconformities and Status..... | 24 |
| Appendix A: Summary of Findings | 28 |
| Appendix B: Approved Time Bound Plan..... | 107 |
| Appendix C: GHG Reporting Executive Summary | 109 |
| Appendix D: General Chain of Custody Requirements for the Supply Chain..... | 111 |
| Appendix E: CPO Mill Supply Chain Assessment Report (Module E - CPO Mills: Mass Balance)...131 | |
| Supply Chain Declaration (<i>Applicable For Appendix E</i>) | 135 |
| Appendix F: Location Map of Sindora Palm Oil Mill Certification Unit and Supply bases | 138 |
| Appendix G: Sindora Estate Field Map | 139 |
| Appendix H: Sungai Papan Estate Field Map | 140 |

Appendix I: REM Estate Field Map141
Appendix J: List of Smallholder Sampled *(If applicable – scheme/associated/group certification)*.142
Appendix K: List of Abbreviations.....143

Section 1: Scope of the Certification Assessment

| 1. Company Details | | | |
|---|--|---------------------------------|--|
| RSPO Membership Number | 1-0080-09-000-00 | Membership Approval Date | 15/06/2009 |
| Parent Company Name | Johor Corporation | | |
| Address | K.B 705 80990 Johor Bahru, Johor, Malaysia | | |
| Subsidiary (Certification Unit Name) | Sindora Palm Oil Mill | | |
| Address | KB 501 86009 Kluang, Johor, Malaysia | | |
| Contact Name | Mrs Salasah Elias | | |
| Website | www.kulim.com.my | E-mail | salasah@kulim.com.my |
| Telephone | +607 8611611 | Facsimile | +607 8631084 |

| 2. Certification Information | | | |
|-------------------------------|--|------------------------------------|------------|
| Certificate Number | RSPO 612392 | Date of First Certification | 23/01/2009 |
| | | Certificate Start Date | 23/01/2019 |
| | | Certificate Expiry Date | 22/01/2024 |
| Scope of Certification | Palm Oil and Palm Kernel Production from Sindora Palm Oil Mill and Supply Base (Sindora Estate, Sungai Papan Estate, REM Estate) | | |
| Applicable Standards | RSPO P&C 2013 (MYNI-2014) and RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module E) | | |

| 3. Other Certifications | | | |
|------------------------------|----------------------------|------------------------------|--------------------|
| Certificate Number | Standard(s) | Certificate Issued by | Expiry Date |
| A76503 | MS 1500:2009 | JAKIM | 15/06/2019 |
| AR1825 | ISO 9001:2008 | SIRIM | 21/11/20 |
| EU-ISCC-Cert- DE119-60182024 | ISCC EU | ASG CERT | 12/03/2019 |
| MPOB/COP/MF/00 03-2 | Code Good Milling Practise | MPOB | 20/07/2019 |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| 4. Location(s) of Mill & Supply Bases | | | |
|---------------------------------------|------------------------------|-----------------|-------------------|
| Name (Mill / Supply Base) | Location [Map Reference #] | GPS Coordinates | |
| | | Latitude | Longitude |
| Sindora Palm Oil Mill | Kluang, Johor, Malaysia | 1° 59' 7.34" N | 103° 27' 44.32" E |
| Sindora Estate | Kluang, Johor, Malaysia | 1° 57' 48.11" N | 103° 28' 17.98" E |
| Sungai Papan Estate | Kota Tinggi, Johor, Malaysia | 1° 31' 1.25" N | 104° 6' 21.81" E |
| REM Estate | Kota Tinggi, Johor, Malaysia | 1° 42' 12.4" N | 103° 52' 59.7" E |

| 5. Description of Supply Base | | | | | |
|-------------------------------|--|--------------|-----------------------------------|--------------------|-----------------|
| Estate | Total Planted (Mature + Immature) (ha) | HCV (ha) | Infrastructure & Other (ha) | Total Area (ha) | % of Planted |
| Sindora Estate | 3,398.43 | 20.21 | 500.42 | 3,919.06 | 86.71 |
| Sungai Papan Estate | 2,614.07 | 11.49 | 400.32 | 3,025.88 | 86.39 |
| REM Estate | 1,749.61 | 21.75 | 469.75 | 2,241.11 | 78.07 |
| Total | 7,762.11 | 53.45 | 1,370.49 | 9,186.05 | 84.50 |

*REM Estate : land acquired by JKR (0.153 ha – road), Sindora: NPP P17A & P17B : 266.17 ha

| 6. Plantings & Cycle | | | | | | | |
|----------------------|-----------------|-----------------|-----------------|---------------|---------------|-----------------|-----------------|
| Estate | Age (Years) | | | | | Mature* * | Immature |
| | 0 - 3 | 4 - 10 | 11 - 20 | 21 - 25 | 26 - 30 | | |
| Sungai Papan Estate | 357.69 | 1,459.51 | 1,017.99 | 0 | 0 | 2,256.38 | 357.69 |
| REM Estate | 607.38 | 593.63 | 94.49 | 308.22 | 261.39 | 1,257.73 | 491.88 |
| Sindora Estate | 1,898.45 | 1,350.09 | 416.06 | 0 | 0 | 1,766.15 | 1,632.28 |
| Total (ha) | 2,863.52 | 3,403.23 | 1,528.54 | 308.22 | 261.39 | 5,280.26 | 2,481.85 |

| 7. Certified Tonnage of FFB (Own Certified Scope) | | | |
|---|--------------------------------|------------------------------|-------------------------------|
| Estate | Tonnage / year | | |
| | Estimated (Feb 18 – Jan 19) | Actual (Oct 17 – Sept 18) | Forecast (Feb 19 – Jan 20) |
| Sindora Estate | 36,155 | 59,680.83 | 89,672.86 |
| Sungai Papan Estate | 59,784 | 29,445.56 | 33,741.50 |
| REM Estate | 25,798 | 42,704.86 | 55,935.78 |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| | | | |
|-------|---------|------------|------------|
| Total | 121,737 | 131,831.25 | 179,350.14 |
|-------|---------|------------|------------|

| 8. Certified Tonnage of FFB (from other certified unit(s)) if applicable * | | | |
|---|--------------------------------|------------------------------|-------------------------------|
| Estate | Tonnage / year | | |
| | Estimated (Feb 18 – Jan 19) | Actual (Oct 17 – Sept 18) | Forecast (Feb 19 – Jan 20) |
| Basir Ismail Estate | N/A | 277.65 | N/A |
| Renggam Estate | | 0 | |
| Siang Estate | | 1,150.54 | |
| Labis Bahru Estate | | 0 | |
| Sungai Sembrong Estate | | 0 | |
| Pasir Panjang Estate | | 185.03 | |
| Bukit Payung Estate | | 263.30 | |
| Tunjuk Laut Estate | | 424.72 | |
| Total | | | |

| 9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable | | | |
|---|--------------------------------|------------------------------|-------------------------------|
| Independent FFB Supplier | Tonnage / year | | |
| | Estimated (Feb 18 – Jan 19) | Actual (Oct 17 – Sept 18) | Forecast (Feb 19 – Jan 20) |
| NILAI MEGAH | 9,150 | 8,458.46 | 9,104 |
| REE FONG | 1,674 | 511.90 | 1,634 |
| HUP GUAN | 519 | 0 | 477 |
| PER. SRI MAHTAI | 1,386 | 1625.37 | 1,367 |
| PER. SRI MISAN | 17,816 | 13,919.94 | 1,7928 |
| PER. MD SANGIDI | 3,677 | 7,155.95 | 3,801 |
| ENG LEE HENG TRADING | 59,145 | 76,762.62 | 58,659 |
| CHE YU TRADING | 1,648 | 214.82 | 1,541 |
| KIND ACTION | 0 | 806.45 | 0 |
| TH PLANTATION | 0 | 606.86 | 0 |
| Total | 95,015 | 110,062.37 | 94,511 |

RSPO Public Summary Report

Revision 7 (Aug /2018)

| 10. Certified Tonnage | | | |
|--|--------------------------------|------------------------------|-------------------------------|
| Mill Capacity: 60 MT/hr SCC Model: MB | Estimated (Feb 18 – Jan 19) | Actual (Oct 17 – Sept 18) | Forecast (Feb 19 – Jan 20) |
| | FFB | FFB | FFB |
| | 143,699.95 mt | 134,132.49 mt | 179,350.14 mt |
| | CPO (OER:21.27 %) | CPO (OER: 20.79%) | CPO (OE8040.73R: 20.94%) |
| | 30,571.36 mt | 27,892.65 mt | 37,573.85 mt |
| | PK (KER:5.67 %) | PK (KER:5.31 %) | PK (KER:5.35%) |
| 8,040.73 mt | 7,124.54 mt | 9,695.23 mt | |

**volume extension sub license ID: CB49756 CPO: 4,671.52 mt, PK: 1,134.05, FFB: 21,962.95 (based on OER forecast of 21.27%)*

| 11. Actual Sold Volume (CPO) | | | | | |
|------------------------------|----------------|-------------------------|-----|--------------|-----------|
| | RSPO Certified | Other Schemes Certified | | Conventional | Total |
| | | ISCC | RSB | | |
| CPO (MT) | 6,607.99 | 5,641 | - | 11,250 | 23,498.99 |

** Actual volume sold from the period of Oct 2017 to Sept 2018 and did not include the previous accumulating stock.*

| 12. Actual Sold Volume (PK) | | | | | |
|-----------------------------|----------------|-------------------------|-----|--------------|---------|
| | RSPO Certified | Other Schemes Certified | | Conventional | Total |
| | | ISCC | RSB | | |
| PK (MT) | 1,776.32 | - | - | 3,500 | 5276.32 |

** Actual volume sold from the period of Oct 2017 to Sept 2018 and did not include the previous accumulating stock.*

| 13. Actual Group certification Claims | | |
|---------------------------------------|--------|----------------------|
| | Credit | Physical Volume (MT) |
| IS-CSP0 | N/A | N/A |
| IS-CSPKO | N/A | N/A |
| IS-CSPKE | N/A | N/A |

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: ASI-ACC-067)
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
No. 8, Jalan Kerinchi
59200 Kuala Lumpur
Tel +603 2242 4211 Fax +603 2242 4218
Nicholas Cheong: Nicholas.Cheong@bsigroup.com
www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The on-site recertification assessment was conducted from 02-05/10/2018. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The Major NC close out on-site assessment was conducted on 02/01/2019. The audit programmes are included in Section 2.3.

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. RSPO Principles & Criteria 2013 (MY-NI 2014) and RSPO Supply Chain Certification Standard 2017 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 where the stakeholder notification was made on 14/08/2018 through BSI & RSPO website as per following link: https://www.bsigroup.com/globalassets/localfiles/en-my/rspo/Public%20Notification/2018/sept-2018/kulim_sindora-and-supply-base_english.pdf

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base.

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (0.8\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula $(0.8\sqrt{y}) \times (z)$; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

RSPO Public Summary Report
Revision 7 (Aug /2018)

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO 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 3.5.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment/annual surveillance assessment are detailed in Section 3.4.

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

For Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification Reviewer prior to certification 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 / Supply Base) | Year 1 (Recertification) | Year 2 (ASA2_1) | Year 3 (ASA2_2) | Year 4 (ASA2_3) | Year 5 (ASA2_4) |
| Sindora Palm Oil Mill | √ | √ | √ | √ | √ |
| Sindora Estate | √ | √ | √ | √ | √ |
| Sungai Papan Estate | √ | √ | √ | √ | √ |
| REM Estate | √ | √ | √ | √ | √ |

Tentative Date of Next Visit: September 23, 2019 – September 26, 2019

Total No. of Mandays: 13 mandays including 1.0 day SC for mill.

2. 2 BSI Assessment Team:

| Team Member Name | Role <i>(Team Leader or Team member)</i> | Qualifications <i>(Short description of the team members)</i> |
|------------------------------|---|---|
| Mohamed Hidhir Zainal Abidin | Team Leader | He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health, environmental and workers and stakeholders consultation. |
| Hafriazhar Mohd Mokhtar | Team Member | Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO P&C and SCCS standards and recently completed his RSPO P&C Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea and Solomon Islands. During assessment, he covered the mill and estate best practices, legal issues, social issues, workers consultation, stakeholder consultation, environmental and occupational safety & health. He is fluent in Bahasa Malaysia and English languages. |
| Muhamad Naqiuddin | Team Member | He hold Bachelor of Science Horticulture at University Putra Malaysia. He has 11 years working experience in oil palm plantation industry as sustainability team. Joining the sustainability team, he managed, implement and monitors the RSPO, ISCC, MSPO and ISO 9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training related to RSPO, MSPO and other certifications where applicable to the operations during previous company. He is a trained as Safety and Health Officer, Food Safety System (FSSC and ISO 22000) for Mill and refineries, ISO 9001, ISO 45001 and already attend HCV training with Proforest. During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, safety and health, environmental and workers and stakeholders consultation. He is fluent in Bahasa Malaysia and English languages. |
| Elzy Ovktafia | Team Member | She graduated from Universiti Putra Malaysia in Diploma of Agriculture, holding the designatory of LISP from the Incorporated Society of Planters and currently in the midst of completing the |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| | | |
|--|--|--|
| | | <p>AISP level (professional certificate and recognition from the Incorporated Society of Planters). She involve in audits and technical reviews works mainly for Sustainability Programme includes RSPO, MSPO and 2nd Party Audit for Social Compliance Programme (URSA, ETI, etc) for 2 years in more than 11 countries. She is a qualified Lead Auditor/Auditor for RSPO P&C, RSPO NEXT, RSPO SCC, ISO 9001:2015 and Social Compliance Audit by Verite. Prior to this, she was the Agronomist in R&D Department for almost 5 years in Oil Palm Plantation where her task involved in all Oil Palm Plantation Operations such as conducting experimental trials on Research & Development with technical paper publications, Crop Forecast, Leaf & Soil Sampling Collection, Fertilizer Recommendation, Pest and Diseases Training, Quality Control as well as special project namely Yield Intensification Project and Food for Palm Project for estates. During this assessment, she assessed on Supply Chain elements in Mill. She is fluent in Bahasa Malaysia and English languages.</p> |
|--|--|--|

Accompanying Persons:

| No. | Name | Role |
|-----|------|------|
| | | |

2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment.

| PRELIMINARY AGENDA | | | | | | |
|--|---------------|---|--------|-------|------|------|
| Date | Time | Subjects | Hidhir | Hafri | Naqi | Elzy |
| Monday 1/10/2018 | PM | Audit Team travelling to Johor Bahru. Check-in at Mutiara Hotel, JB | √ | √ | √ | √ |
| Tuesday 2/10/2018 Sindora Palm Oil Mill | 08.30 – 09.00 | <p>Opening Meeting:</p> <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation). • Verification on previous audit findings | √ | √ | √ | √ |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| PRELIMINARY AGENDA | | | | | | | |
|------------------------|---------------|---|--|-------|------|------|--|
| Date | Time | Subjects | Hidhir | Hafri | Naqi | Elzy | |
| | 09.00 – 12.00 | Sindora Palm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc. RSPO Supply chain audit (General Chain of Custody) | √ | √ | √ | √ | |
| | 10.00 – 12.00 | Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) | - | √ | - | - | |
| | 12.00 – 13.00 | Lunch | √ | √ | √ | √ | |
| | 13.00 – 16.30 | Sindora Palm Oil Mill: Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities. Continue with SCC module E requirement audit | √ | √ | √ | √ | |
| | 16.30-17.00 | Interim Closing briefing. | √ | √ | √ | √ | |
| Wednesday 3/10/2018 | 08.30 – 12.00 | Sg Papan Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc. | √ | √ | √ | | |
| | | 09.00 – 12.00 | Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) | - | √ | - | |
| | | 12.00 – 13.00 | Lunch | √ | √ | √ | |
| | | 13.00 – 16.30 | Sg Papan Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc). | √ | √ | √ | |
| | | 16.30-17.00 | Interim Closing Briefing | √ | √ | √ | |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| PRELIMINARY AGENDA | | | | | | |
|--|---------------|---|--------|-------|------|------|
| Date | Time | Subjects | Hidhir | Hafri | Naqi | Elzy |
| Thursday 4/10/2018 REM Estate | 8.30 – 13.00 | REM Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc. | √ | √ | √ | |
| | 09.00 – 12.00 | Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) | - | √ | - | |
| | 13.00 – 14.30 | Lunch break | √ | √ | √ | |
| | 14.30 – 16.30 | REM Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc). | √ | √ | √ | |
| | 16.30-17.30 | Interim Closing | √ | √ | √ | |
| Friday 5/10/2018 Sindora Estate | 8.30 – 13.00 | Sindora Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc. | √ | √ | √ | |
| | 09.00 – 12.00 | Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) | - | √ | - | |
| | 13.00 – 14.30 | Lunch break and Friday prayer | √ | √ | √ | |
| | 14.30 – 16.30 | Sindora Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc). | √ | √ | √ | |
| | 16.30-17.30 | Audit team discussion and closing meeting | √ | √ | √ | |
| Saturday 6/10/18 | AM | Audit team travelling back to KL | √ | √ | √ | |

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- Johor Corporation Time Bound Plan
- RSPO P&C 2013 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C GA-NIWG 2017
- RSPO P&C INA-NIWG 2016
- RSPO P&C MY-NIWG 2014
- RSPO P&C PNG-NIWG 2017

3.2 Time Bound Plan progress for multiple management units

| Time Bound Plan | | |
|--|---|------------|
| Requirement | Remarks | Compliance |
| Summary of the Time Bound Plan | | |
| Does the plan include all subsidiaries, estates and mills? | Yes For Malaysia the group estate have been completed certified. For Indonesia, PT Win (PT SSR, PT HBS, and PT WSK) was completed disposal on December 2017. Currently Kulim acquire PT TPR and PT Raj was now under rehabilitation process. | Yes |
| Have all the estates and mills certified within five years after obtaining RSPO membership? | Yes | Yes |
| Is the time bound plan challenging? <ul style="list-style-type: none"> • Age of plantations. • Location. • POM development • Infrastructure. • Compliance with applicable law. | Kulim (Malaysia) Berhad has in 2015 continued to operate in a dynamic and volatile environment, characterised by abundant of supplies and lower price of CPO globally. Being one of the lowest price for the commodity, this much affected our plantation margins. The industry was also impacted by growing strength of US Dollar adding the downward pressure of the price Our divestment from New Britain (NBPOL) was completed on 26 February 2016, operationally at the year ended 31 December 2016, we have plantation operations in Peninsular Malaysia and Central Kalimantan Indonesia for a total of 50 999 ha in Malaysia and 40 646 ha of land in Indonesia. The planting of new palm is ongoing albeit at a slower pace, we have some 307 ha been planted. Age profile ranging from 0 – 23 years of age. The group remains committed to improving the age profile, during | Yes |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| | | |
|---|--|-----|
| | <p>which a total of 1155 ha been replanted. Average age profile has improved to 11.72 years.</p> <p>The group has acquired Pasir Panjang Palm Oil Mill through Mahamurni Plantation Sdn Bhd in March 2015 and successfully RSPO Certified for 2017</p> | |
| Have there been any changes since the last audit? Are they justified? | <p>Another Biogas plant located in Pasir Panjang Palm Oil Mill was commissioned in September 2015 with another plant in Sindora Palm Oil Mill is expected to be completed in June 2016 with the aim to export electricity to Tenaga Nasional Berhad (TNB) grid.</p> <p>Selective Capital Reduction and Repayment Exercise (SCR) for KMB for 99.59% of shares was presented to Kulim BOD on 3 May 2015, The exercise was approved by Bursa Malaysia 1 August 2016 with Kulim being officially removed from BM on 4 August 2016.</p> | Yes |
| If there have been changes, what circumstances have occurred? | KULIM is now corporatized under Johor Corporation but at the same time both are still a members of RSPO. | Yes |
| Have there been any stakeholder comments? | So far there no comments received. | Yes |
| Have there been any newly acquired subsidiaries? | After successfully acquired PT RAJ and PT TPR was completed on 23 June 2016 in South Sumatera. Currently not certified and was under rehabilitation for 5 years. | Yes |
| If yes, have the newly acquisitions certified within a three-year timeframe? | The rehabilitation process has been carried out according to the program schedule. | |
| Have there been any isolated lapses in implementation of the plan? | There is no isolated lapse in Time Bound Plan except for smallholder proposed certification program that halted due to unstable supply to our mill. | Yes |
| Un-Certified Units or Holdings | | |
| Did the company conduct an internal audit? If so, has a positive assurance statement been produced? | Indonesia AMDAL report had been completed and report already submitted to RSPO for Public Notification. RSPO has approved the NPP. | Yes |
| <p>No replacement after dates defined in NIS Criterion 7.3:</p> <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in | So far no new planting that replaced primary forest. | Yes |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| | | |
|---|---|----------|
| accordance with RSPO P&C criterion 7.3. | | |
| Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure. | No new planting activities within uncertified unit. | Yes |
| Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6. | No land conflict | Yes |
| Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3. | No labour dispute | Yes |
| Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1 | No legal non compliance | Complied |
| Did the company conduct an internal audit? If so, has a positive assurance statement been produced? | RSPO internal audit assessment for all certified units been conducted and the report had been submitted to all unit for improvement plan. | |

3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment)

| Progress of scheme smallholders or outgrowers towards compliance with relevant standards | | |
|---|----------------|------------|
| Requirement | Remarks | Compliance |
| Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? | Not applicable | N/A |

RSPO Public Summary Report
Revision 7 (Aug /2018)

3.4 Details of findings

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

During the Recertification Assessment there were three (3) Major & two (2) Minor nonconformities raised. The Sindora Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

| Summary of Total Number of Nonconformity | | | |
|--|---|--|--------------------------|
| Nonconformity | | | |
| NCR Ref # | 1692268-201809-M1 | Clause & Category (Major / Minor) | Indicator 5.3.1 Major |
| Date Issued | 05/10/2018 | Due Date | 04/01/2019 |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 02/01/2019 |
| Statement of Nonconformity: | The documented procedure is not updated as per RSPO SCC Standard Version June 2017 & RSPO Rules on Market Communications & Claims (version 2016). | | |
| Requirement Reference: | The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. | | |
| Objective Evidence: | The SOP Sustainable Management System, Traceability, Doc. No: SQD/SMS/1.2 Date 1 July 2018. However, the activity of CPO and PK sales transaction is not covered under the Traceability procedure. Management has the SOP: CSPO Supply Chain Rev: 00 Procedure No: MKD/001 dated 08 February 2012. Both procedures are not updated and cross-referenced with RSPO SCC Standard Version June 2017 & RSPO Rules on Market Communications & Claims (version 2016). | | |
| Corrections: | Both SOP i.e Sustainable Management System SQD/SMS/1.2 and CSPO Procedure MKD/001 dated 08 February 2012 reviewed and both were made cross reference with RSPO SCC Standard Version June 2017 | | |
| Root Cause Analysis: | The Traceability procedure does not cover CPO & PK sales for it was already covered by RSPO SCC procedure that its review to 2017 version was inadvertently overlooked hence it was not updated accordingly | | |
| Corrective Actions: | Re-Training on RSPO SCC Standard Version June 2017 and RSPO Rules on Market Communications & Claims (version 2016) should be organize for all Palm Oil Mills, Marketing and Sustainability Department. Major NC close out verification: Procedures for RSPO SCC have been revised, Sustainable Management System SQD/SMS/1.2, rev: 1 dated 9/10/18 and CSPO Procedure MKD/001, rev:01 dated 9/10/18. The component of CPO and PK sales has been updated in the procedure. RSPO SCC training was carried on 26/12/18 by external trainer for the new RSPO SCC Standard June 2017. The intent of training is to update the necessary changes | | |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| | |
|-------------------------------|--|
| | <p>in the standard to be in lined with company's SOPs and implementation. Relevant mill personnel and marketing department were involved in the training. Re-training of RSPO SCC SOP was carried out on 28/12/18 by Assistant Engineer for all relevant mill personnel to update the latest changes in the SOP.</p> <p>Based on interview with the mill personnel (weighbridge operator and assistant engineer), they are able to explain the process of CPO and PK sales including reconciliation process of volume traded, announce and delivered on monthly basis.</p> |
| Assessment Conclusion: | <p>Corrective action taken has been effectively implemented, thus the major NC is closed on 2/1/19. Continuous implementation will be further verified in the next assessment.</p> |

| Summary of Total Number of Nonconformity | | | |
|---|---|--|--------------------------|
| Nonconformity | | | |
| NCR Ref # | 1692268-201809-M2 | Clause & Category (Major / Minor) | RSPO SCCS 5.4.2 Major |
| Date Issued | 05/10/2018 | Due Date | 04/01/2019 |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 02/01/2019 |
| Statement of Nonconformity: | The SOP for handling the non-conforming product is not includes the FFB handling process. | | |
| Requirement Reference: | The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents. | | |
| Objective Evidence: | Sindora POM has the SOP, Core Process, Control of Non-Conforming Product, Doc. NoL SNPOM/SOP/8.20 dated 01 Jan 2018 but so far, no non-conforming product related to RSPO reported however, it is not cover on the FFB handling process. | | |
| Corrections: | The SOP i.e Sustainable Management System SQD/SMS/1.2 on Traceability document the FFB handling been revised, to be read together with mill's ISO Control of Non-Conforming Product (CNCP) procedure and cross-reference with RSPO SCC Standard Version June 2017 | | |
| Root Cause Analysis: | The current POM procedure does not cover FFB handling that related to RSPO, it was inadvertently overlook since the product handling procedure only address the requirement of ISO only. | | |
| Corrective Actions: | <p>Re-Training on Traceability SOP and the related RSPO SCC Standard Version June 2017 and RSPO Rules on Market Communications & Claims (version 2016) should be organize for all Palm Oil Mills, Marketing and Sustainability Department.</p> <p>Major NC close out verification: Procedures for RSPO SCC have been revised, Sustainable Management System SQD/SMS/1.2, rev: 1 dated 9/10/18 and CSPO Procedure MKD/001, rev:01 dated 9/10/18. The component of FFB handing @ non-conforming product has been updated in the procedure.</p> <p>In-house RSPO SCC training was carried on 26/12/18 by external trainer for the new RSPO SCC Standard June 2017. The intent of training is to update the necessary changes in the standard to be in lined with company's SOPs and implementation. Relevant mill personnel and marketing department were involved in the training.</p> | | |

| | |
|-------------------------------|---|
| | <p>Re-training of RSPO SCC SOP was carried out on 28/12/18 by Assistant Engineer for all relevant mill personnel to update the latest changes in the SOP.</p> <p>Based on interview with the mill personnel (weighbridge operator and assistant engineer), they are able to explain the process of FFB handling including crop diversion within Kulim's group mill.</p> |
| Assessment Conclusion: | <p>Corrective action taken has been effectively implemented, thus the major NC is closed on 2/1/19. Continuous implementation will be further verified in the next assessment.</p> |

| Summary of Total Number of Nonconformity | | | |
|---|--|--|--------------------------|
| Nonconformity | | | |
| NCR Ref # | 1692268-201809-M3 | Clause & Category (Major / Minor) | Indicator 2.1.1 Major |
| Date Issued | 05/10/2018 | Due Date | 04/01/2019 |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 02/01/2019 |
| Statement of Nonconformity: | Compliance to with relevant legal requirements has not effectively demonstrated | | |
| Requirement Reference: | i)Evidence of compliance with relevant legal requirements shall be available. ii)Noise Exposure Regulation 1989, Regulation 27 - Part VII; Employee Information & Training iii) Employment Act 1955 (Act 265); PART VIII; Employment Of Women; 34. Prohibition of night work | | |
| Objective Evidence: | i)No hearing conservation programme planned for preventive measure as to date. 7 hearing impairment cases recorded in 2017 and 8 cases recorded in 2018. Refer to JKKP 7 dated 2/8/17 and 27/5/18. ii)Women employee (Employee # 000951854; Workstation: Weighbridge operator) work attendance (punch-card) records for the month of Aug 2018 shown the women worker work exceeded 10pm at night on 5th, 6th, 20th and 21st. Punch-card records for month of Sep 2018 shown the same women worker work exceeded 10pm at night on 2nd, 3rd, 11th, 21st and 30th. | | |
| Corrections: | i) The said training will be conducted on 4 Nov. 2018 for all relevant employees at Sindora POM ii) Immediate application forwarded by the mill to JTK for approval of permits under Section 34 on restriction of female employees working at night between the hours of 10.00 pm and 5.00 am in industrial and agricultural undertaking | | |
| Root Cause Analysis: | i) There is miss understanding on the part of mill and OSH consultant on the need for Hearing Conservation training programme requirement that need to be conducted for employees involves under Noise Exposure Regulation 1989, Regulation 27 – Part VI ii) There are some late deliveries of FFB that were intermittently requested by the supply chain as to avoid backlog at estates that shall affect the quality of fruit thus mill have to provide for the request | | |
| Corrective Actions: | i) The same program will be included as OSHA listed training and shall be organized for respective OUs as annual OSHA training program. ii) The application for approval of permits were also submitted by all POMs. We were made to understand that DG Labour has decided that all blanket approvals granted to employers in Peninsular Malaysia for exemption from the | | |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| | |
|-------------------------------|--|
| | <p>provisions under section 24 and section 34 of the Employment Act 1955 are still valid, in force and continued to be applicable provided all conditions imposed thereof are complied with.</p> <p>Major NC close out verification: Hearing conservation programme carried out on 4/11/18 by external trainer was verified. Training module on Hearing Protection Device @ HPD and noise training has been covered as part of the said programme. Moving forward, hearing conservation training is included in the 2019 annual OSH training programme for Kulim (M) Berhad. Verified blanket exemption issued by from YBhg. Dato’ Mohd Jeffrey Bin Joakim, Director General of Labour based on letter Ref. BHG. PU/9/108/1(2) dated 1 June 2018. Thus, the non-conformity on prohibition of night work for women is dropped. However, internally, mill management has issued a memo dated 4/10/18 to advise working hours for women only up to 10 pm.</p> |
| Assessment Conclusion: | Corrective action taken has been effectively implemented, thus the major NC is closed on 2/1/19. Continuous implementation will be further verified in the next assessment. |

| Summary of Total Number of Nonconformity | | | |
|---|---|--|-------------------------------------|
| Nonconformity | | | |
| NCR Ref # | 1692268-201809-N1 | Clause & Category (Major / Minor) | Indicator 4.7.5 Minor |
| Date Issued | 05/10/2018 | Due Date | Next annual surveillance assessment |
| Closed (Yes / No) | No | Date of nonconformity Closure | “Open” |
| Statement of Nonconformity: | Record of all accident has not periodically reviewed effectively. | | |
| Requirement Reference: | Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. | | |
| Objective Evidence: | JKKP 8 report submitted dated 11 th January 2018 has not include 7 hearing impairment cases via JKKP 7 dated 2 August 2017 as per requirement of NADOPOD Reg. 10 (1)(b). | | |
| Corrections: | Completed filling up the JKKP 8 and include 7 hearing impairment cases via JKKP 7 and submit to DOSH on 9/10/18. Awareness training will be conducted on 2 Nov 2018 for the person that responsible to fill the JKKP 8. | | |
| Root Cause Analysis: | Miss understand that impairment cases in JKKP 7 should be include in JKKP 8. | | |
| Corrective Actions: | Refresher Training on all JKKP forms will be conducted as part of OSHA Annual Briefing 2019. | | |
| Assessment Conclusion: | The corrective action plan is accepted. Implementation of corrective action taken will be further verified in the next audit. | | |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| Summary of Total Number of Nonconformity | | | |
|---|---|--|-------------------------------------|
| Nonconformity | | | |
| NCR Ref # | 1692268-201809-N2 | Clause & Category (Major / Minor) | Indicator 4.1.3 Minor |
| Date Issued | 05/10/2018 | Due Date | Next annual surveillance assessment |
| Closed (Yes / No) | No | Date of nonconformity Closure | "Open" |
| Statement of Nonconformity: | Records of monitoring was not effectively maintained. | | |
| Requirement Reference: | Records of monitoring and any actions taken shall be maintained and available, as appropriate. | | |
| Objective Evidence: | EHS related records for working at height and confined space activities for; Boiler Furnace Staging/Scaffolding Erection: 7/5/17 AE health declaration record and monitoring mechanism for erected staging/scaffolding was not available | | |
| Corrections: | i) To revise the current Permit To Work to include Staging/ Scaffolding Erection & dismantling and also to include the checklist of requirement of the activity before they start work. ii) Awareness training on Staging/Scaffolding activities will be organized for POM personnel iii) Awareness training will be conducted to workers. iv) All the working at height will take the competent person to monitoring the staging and keep the records. v) Create new permit form that include health declaration | | |
| Root Cause Analysis: | There is lack of knowledge on the part of mill on the need for respective record of monitoring & maintenance of the activities to be kept. | | |
| Corrective Actions: | KSTS to provide SOP for the said activity to be communicated to all mills. | | |
| Assessment Conclusion: | The corrective action plan is accepted. Implementation of corrective action taken will be further verified in the next audit. | | |

| Opportunity for Improvements | |
|-------------------------------------|--------------------|
| OFI # | Description |
| OFI 1 | Nil |

| Positive Findings | |
|--------------------------|--|
| PF # | Description |
| PF 1 | Continual improvement can be seen from the allocation of budget for ESH as well as for workers welfare |

3.4.1 Status of Nonconformities Previously Identified and Observations

| Non-Conformity | | | |
|-----------------------|---------------------|--|--------------------------|
| NCR Ref # | | Clause & Category (Major / Minor) | |
| | 1543271- 201709- M1 | | Indicator 6.5.1 Major |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| | | | |
|------------------------------------|---|--------------------------------------|------------|
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 16/12/2017 |
| Statement of Nonconformity: | The harvesters who worked on rest day (Saturday) were not paid twice his ordinary rate per piece as per Employment Act 1955. | | |
| Requirement Reference: | Documentation of pay and conditions shall be available. | | |
| Objective Evidence: | <p>Interviewed with the following workers (harvesters) in both estates found that they were worked on rest day (Saturday) for month July - September 2017 were not paid twice his ordinary rate per piece as per the Employment Act 1955, Subsection 60 (3) (d) as below: Sindora Estate Employee No.: 680333, Employee No.: 680229, Employee No.: 680355, Employee No.: 680442 Sg Papan Estate Employee No.: 625889, Employee No.: 625955, Employee No.: 626018, Employee No.: 626049, Employee No.: 626063, Employee No.: 625683, Employee No.: 625798, Employee No.: 625901, Employee No.: 625902, Employee No.: 626002</p> <p>In addition, document reviewed on the Harvesting Interval Record Book in Sungai Papan Estate found that they harvested on the following field on the respective rest day: July 2017 – 8/7/2017 (P13, P04), 15/7/2017 (P08A, P03) and 22/7/2017 (P03, P09A) August 2017 – 12/8/2017 (P14, P09A, P05), 19/8/2017 (P08A, P03, P09A) and 26/8/2017 (P08A, P12, P03, P09A) September 2017 – 9/9/2017 (P05) and 16/9/2017 (P14, P03, P04, P09A)</p> <p>However, in the checkroll attendance book and payslip found that they were not recorded for the turned up of work on rest day. The tonnage they harvested on rest day were brought forward to Sunday which paid as normal rate but were not paid twice his ordinary rate per piece even though they harvested on rest day. Besides, in the employment contract signed by workers under Clause 2 (iv) has stated if they work on rest day, they are entitled with double of their rate.</p> | | |
| Corrective Actions: | <ol style="list-style-type: none"> 1. Estate management shall advise and brief the workers earlier should there' any need for work on weekly day of rest. 2. The communication will be informed and communicated through morning muster and recorded in the Muster Training Book 3. All authorized work on rest day shall be done through the Form Authorisation of Overtime/Work on rest Day/ Public Holiday which will be mutually agreed and signed by both employer and employee(s). 4. Plantation Operation Department (POD to brief/communicate the implementation guideline to all Regional Coordinator and estates' manager. | | |
| Assessment Conclusion: | <p>Evidence of corrective actions sighted:</p> <ul style="list-style-type: none"> - Briefing done through daily muster briefing as per records of Master Briefing Book. Sighted records of briefing conducted on 26/1/2018, 23/4/2018 and 18/9/2018 in Sg. Papan Estate, REM Estate and Sindora Estate respectively. - Sample Authorization of Work On Rest Day 22 September 2018 by Regional Controller for Sindora Estate - Records of Circular to all estate managers by Estates Operations Department General Manager on Working on Weekly Day of Rest; Dated: 11/12/2017; Ref. Agency Circular # 5/2017 <p>Evidences shown CAP confirmed to be effectively implemented without any recurrence of issue. Hence Major NC remained close.</p> | | |

Non-Conformity

| | | | |
|------------------------------------|--|--|---------------------------|
| NCR Ref # | 1543271- 201709- M2 | Clause & Category (Major / Minor) | Indicator 6.12.3 Major |
| Closed (Yes / No) | | Date of nonconformity Closure | 16/12/2017 |
| Statement of Nonconformity: | Specific policy and procedures stated that the company has practice of no contract of substitution was not available. | | |
| Requirement Reference: | Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. | | |
| Objective Evidence: | Kulim (Malaysia) Berhad has developed Kulim Sustainability Handbook and policies which included the following aspects: The company will treat their people with respect, dignity and fairness stated in People Policy and will not engage in nor support discrimination in any form stated in Rights of Employee Policy. The company will puts high priority on employees' trainings and educations stated in the Handbook and provide induction training stated in the Procedure of Receiving New Foreign Workers at Operating Unit. The company will provide housing and basic amenities according to the minimum statutory requirements stated in Handbook. However, there was no specific policy and procedures stated no contract of substitution was practice in the company | | |
| Corrective Actions: | <ol style="list-style-type: none"> Briefing on new established policy to respective interested party i.e. estate and mill management. Approved Policy and Procedures will be published and communicated to all operating units. | | |
| Assessment Conclusion: | <p>Evidence of corrective actions sighted:</p> <ul style="list-style-type: none"> Briefing done through daily muster briefing as per records of Master Briefing Book. Sighted records of briefing conducted on 26/1/2018, 23/4/2018 and 18/9/2018 in Sg. Papan Estate, REM Estate and Sindora Estate respectively. Approved policy sighted established as Kulim (Malaysia) Berhad Core Labour Standard; Signed by Executive Director; Dated: 1/5/2018. Displayed in strategic location at operating units and communicated directly during meeting and assembly. <p>Evidences shown CAP confirmed to be effectively implemented without any recurrence of issue. Hence Major NC remained close.</p> | | |

| Non-Conformity | | | |
|------------------------------------|--|--|--------------------------|
| NCR Ref # | 1543271- 201709- M3 | Clause & Category (Major / Minor) | Indicator 6.1.3 Major |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 16/12/2017 |
| Statement of Nonconformity: | Promotion of positive impacts was not available in the management plan. | | |
| Requirement Reference: | Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. | | |
| Objective Evidence: | Sindora POM & Sindora Estate: The mill and estate has generated a management plan for Y2017 on 1/10/2017 and 12/12/2017 respectively. Negative impacts were identified and mitigating action were included in the plan. However, the plan has yet to include the promotion of the positive impacts. | | |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| | |
|-------------------------------|--|
| Corrective Actions: | Approved revisit management plan for Y2017 will be communicated to all operating units accordingly. |
| Assessment Conclusion: | Evidence of corrective actions sighted: - Sindora Estate: Latest Daftar Impact Social Kulim (Malaysia) Berhad 2018; Dated: 15/9/2018; Serial # SIA01 – SIA07 and Cadangan Penambahbaikan Sosial Bagi Ladang Sindora 2018; Dated: 15/9/2018; Serial # LS01 – LS05 - Records of communication of SIA during meeting and assembly at mill and daily muster briefing at estate. Evidences shown CAP confirmed to be effectively implemented without any recurrence of issue. Hence Major NC remained close. |

3.4.2 Summary of the Nonconformities and Status

| CAR Ref. | Category (Major / Minor) | P&C Indicator | Issued Date | Status & Date (Closure) |
|---------------------|--------------------------|---------------|-------------|--------------------------|
| 1543271- 201709- M1 | Major | 6.5.1 | 17/10/2017 | Closed out on 16/12/2017 |
| 1543271- 201709- M2 | Major | 6.12.3 | 17/10/2017 | Closed out on 16/12/2017 |
| 1543271- 201709- M3 | Major | 6.1.3 | 17/10/2017 | Closed out on 16/12/2017 |
| 1692268-201809-M1 | Major | 5.3.1 | 05/10/2018 | Closed out on 02/01/2019 |
| 1692268-201809-M2 | Major | 5.4.2 | 05/10/2018 | Closed out on 02/01/2019 |
| 1692268-201809-M3 | Major | 2.1.1 | 05/10/2018 | Closed out on 02/01/2019 |
| 1692268-201809-N1 | Minor | 4.7.5 | 05/10/2018 | "Open" |
| 1692268-201809-N2 | Minor | 4.1.3 | 05/10/2018 | "Open" |

3.5. Stakeholders Consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Sindora Palm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO 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 later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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 below.

List of Stakeholders Contacted



RSPO Public Summary Report
Revision 7 (Aug /2018)

| | |
|--|---|
| <p>Internal Stakeholders</p> <p>Managers and Assistants Mill & Estate Male Mill Staff/Workers Female Mill Staff/Workers Foreign Workers (Bangladesh, Indonesian) Male and Female Estate workers Joint Consultative Committee Gender Committee representatives/WOW Workers Union Representatives Onsite NUPW representative/secretary</p> | <p>Union/Contractors/Local Communities</p> <p>Contractor (TY Teknik & Rank Chemical Sdn Bhd)</p> |
| <p>Government Departments</p> <p>Fire Department/BOMBA SOCSO</p> | <p>NGO/3rd party</p> <p>NUPW secretary</p> |

| IS # | Description |
|------|--|
| 1 | <p>Issues:</p> <p>BOMBA Kluang BOMBA officer shared that firedrill must be conducted at the mill at least annually and management can anytime liaise with BOMBA for the implementation. So far no other issue regarding fire or open burning related with Sindora POM and its supply bases.</p> <p>Management Responses: Management noted on the information and will continue good teamwork with BOMBA.</p> <p>Audit Team Findings: No other issue.</p> |
| 2 | <p>Issues:</p> <p>Workers' Representatives The workers have informed that their wages were according to Minimum Wage Order 2016. No discrimination was occurred and they were treated equally regardless of the gender and nationalities.</p> <p>Management Responses: Management will continue communicating any new changes on the company policy or SOP through morning muster, trade union and complaint channel.</p> <p>Audit Team Findings: No other issue.</p> |
| 3 | <p>Issues:</p> <p>SOCOSO Kluang</p> |

| | |
|---|---|
| | <p>The SOCSO officer mentioned that Sindora POM and its supply bases has made the registration for SOCSO deduction in salary for their local worker. In 2019, SOCSO will in charge for foreign worker's insurance too and its waiting for the government to announce it.</p> <p>Management Responses: Management noted on the information and will follows up on the information.</p> <p>Audit Team Findings: No other issue.</p> |
| 4 | <p>Issues:</p> <p>SAJ RAINHILL There are water issue currently due to not enough water supply but not severe. Sindora POM and Estates are using the domestic water from the government supply.</p> <p>Management Responses: Management noted on the information and will follows up on the information.</p> <p>Audit Team Findings: No other issue.</p> |
| 5 | <p>Issues:</p> <p>NUPW Secretary - Kluang There is a good cooperation between management and workers and they already received the latest Collaborative Agreements. No other issue pending.</p> <p>Management Responses: Management noted on the information and will continue the good cooperation with NUPW.</p> <p>Audit Team Findings: No other issue.</p> |
| 6 | <p>Issues:</p> <p>Contractors (TY Teknik & Rank Chemical Sdn Bhd) No issue with the agreement and payment made. All made in transparent and timely manners.</p> <p>Management Responses: Management noted on the information and will continue the good practices.</p> <p>Audit Team Findings: No other issue.</p> |
| 7 | <p>Issues:</p> <p>SJK (T) Ladang Pasak Management always support the school activities by giving contribution of services and donation.</p> <p>Management Responses: Management will continue giving support and donation to school as part of their corporate social responsibility.</p> <p>Audit Team Findings: No other issue.</p> |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| Formal Signing-off of Assessment Conclusion and Recommendation | |
|--|--|
| <p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Sindora Palm Oil Mill has complied with the RSPO P&C MY-NI 2014 & RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Sindora Palm Oil Mill is approved and continued.</p> | |
| Report prepared by | Acceptance of Assessment Conclusion |
| Name: Mohamed Hidhir Zainal Abidin | Name: Salasah Elias |
| Company Name: BSI Services Malaysia Sdn Bhd | Company Name: Kulim (Malaysia) Berhad |
| Title: Lead Auditor | Title: Deputy General Manager |
| Signature:  | Signature: (I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)  |
| Date: 7th March 2019 | Date: 11th March 2019 |

Appendix A: Summary of Findings

| Criterion / Indicator | Assessment Findings | Compliance | |
|---|---|--|----------|
| Principle 1: Commitment to Transparency | | | |
| Criterion 1.1: Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making. | | | |
| 1.1.1 | There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance - | Adequate information covering on environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making. Information on environmental, social and legal issues relevant to RSPO Criteria was made available to relevant stakeholders for effective participation in decision making. In company website (http://www.kulim.com.my/), publicly available documents such as OSH plan, HCV documents, negotiation procedure, complaint records, sustainability handbook and report, EIA, Management Plans & Continuous Improvement Plans. Other sensitive information such as land title and etc will be provided upon request. | Complied |
| 1.1.2 | Records of requests for information and responses shall be maintained. -Major compliance | Records of requests for information and responses were maintained at visited operating units. Sample of records checked, Enquiry Register Records & Housing Damage Reports. Sighted latest enquiry register dated 2/1/2018. Other the records including Aduan Kerosakan Perumahan. Latest dated 20/9/2018. Enquiry Register Record; Date: 7/2/2018; By MPOB Officer; MPOB Station, Pekan Bangi Lama, Kajang Selangor | Complied |
| Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|--|--|------------|
| 1.2.1 | <p>Publicly available documents shall include, but are not necessary limited to:</p> <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). <p>- Major compliance –</p> | <p>There is a SPO Transparency Program under Kulim Malaysia Berhad. The procedure is to ensure that documents if to be release and made publicly available are readily available. The Corporate Dept will ensure that the following documents are available if requested and they do not impinge on confidentiality and will not cause detrimental sustainability or social outcoments.</p> <p>Among the documents that were made available for viewin are:</p> <ul style="list-style-type: none"> • Land title (held as hard copy by the property department) • Health and safety plan • Plans and impact assessment- environmental & social • Pollution prevention plans • Details of complaints and grievances • Negotiation procedures • Continuous improvement plan • Biodiversity plans • Policy documents (sustainability handbook) <p>In addition to the website, the policies were also displayed at various locations at the operating units including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view</p> | Complied |
| <p>Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.</p> | | | |

| Criterion / Indicator | Assessment Findings | Compliance |
|--|--|-----------------|
| <p>1.3.1</p> <p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.</p> <p>-Minor compliance</p> | <p>Established as <i>Polisi Etika</i> (Ethical Policy) and <i>Polisi Konflik Kepentingan</i> (Conflict of Interest Policy); both Signed by company's Executive Director; Dated: 1/5/2018. Policy has been communicated to all workers by the management at each operating units within Sindora complex. Sighted for mill was done on 23/9/2018.</p> <p>Sg. Papan Estate: Briefing done through daily muster briefing as per records of Master Briefing Book. Sighted records of briefing conducted on 26/1/2018, 22/4/2018, 23/4/2018, 18/9/2018 and etc. REM Estate: Briefing done through daily muster briefing as per records of Master Briefing Book. Sighted records of specific briefing of all policies including Kulim Ethical Policy conducted on 9/1/2018.</p> <p>Communicated to external provider as per Perakuan Pematuhan Pensijilan MSPO; Kontraktor Kompleks Siang – Ladang REM; Dated: 24/8/2018.</p> <p>Also communicated through Buku Panduan Anggota Pekerja Perladangan Kulim (Malaysia) Berhad; Tarikh Semakan: 1/9/2018</p> <p>Sindora Estate: Communication on Polisi Insan on 6/4/2018 & Polisi Etika on 9/4/2018 through muster briefing recorded in Muster Training Book.</p> | <p>Complied</p> |

| Criterion / Indicator | Assessment Findings | Compliance |
|---|---------------------|------------|
| Principle 2: Compliance with applicable laws and regulations | | |
| Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations. | | |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| | | | |
|--------------|--|--|-----------------------------|
| <p>2.1.1</p> | <p>Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p> | <p>Legal register covering the applicable local and international laws and regulations are available. Compliance to each applicable law and regulation is monitored by the operating units and head office sustainability team. Sample of licenses and permits checked at visited operating units:</p> <p><u>Sindora Mill</u> 1)MPOB license: 500263204000; expiring in 30 June 2019, processing capacity: 210,000 mt 2)DOE Licence: No License 004718 (validity period 1/7/2018 - 30/6/2019) for 40MT/hr and method of POME discharge is furrow system with BOD 100mg/l final discharge limit and composting. 3)BAKAJ- River water extraction license permit (No: 08/A/Klg/041), file# BAKAJ/334/300/05/07/08/16 valid until 31/12/18. Maximum allowable water abstraction; 930 m3 per day. 4)SPAN Water treatment License (License no: SPAN/EKS/PT/800-4(1)/7/15, valid until 1/7/21. 5) Certified environmental professional in the treatment of palm oil mill effluent (CePPOME/00066) dated 5 September 2017 6) Certified environmental professional in schedule waste management (CePSWaM/16254) 8) Permit Barang Kawalan Berjadual- Storage of Diesel (no: J030643), ref: BPGK JH (KLU) 1820 SK valid until 7/10/18. Sighted BLESS application, BL22018037497 dated 24/9/18. 9) Electricity Installation License, serial# 22980, license# 2018/02080, capacity: 3055 kW and valid until 10/8/19. 10) Certificate of Fitness of UPV and SB checked: - Steam Boiler (JH PMD 2038) valid until 13/8/19. - Steam Boiler (JH PMD 1436) valid until 20/4/19. - Sterilizer (PMT 107562) valid until 13/8/19 - Back Pressure Receiver (PMT 107838) valid until 13/8/19</p> | <p>Major nonconformance</p> |
|--------------|--|--|-----------------------------|

| | | | |
|--|--|---|--|
| | | <p>Found increasing cases for Hearing impairment for SIPOM from 7 cases JKKP 7 (dated 2 August 2018) into 8 cases JKKP 7 (dated 27 May 2018), HIRARD already reviewed on September 2018 however found action plan for hearing impairment did not change from the previous year 2017 and not Controls are the elimination or removal of hazards that are not risk the workers who need to enter the area or work using equipment during the scheduled work period as per Guidelines For HIRARC 2008 by DOSH.</p> <p>Sindora Mill: Sighted a sample women worker (Employee # 000951854; Workstation: Weighbridge operator) work attendance (punch-card) records for the month of Aug 2018 shown the women worker work exceeded 10pm at night on 5th, 6th, 20th and 21st. Punch-card records for month of Sep 2018 shown the same women worker work exceeded 10pm at night on 2nd, 3rd, 11th, 21st and 30th.</p> <p><u>Sg Papan Estate</u></p> <p>a) MPOB license 570243002000 valid until 1 March 2018 – 28 February 2019.</p> <p>b) Peraturan- Peraturan Kawalan Bekalan 1974 Peraturan 9(2) – Diesel Permit serial no. J033029 valid from 5 April 2018 until 4 April 2019</p> <p>c)Pengandung Tekanan Tak Berapi JH PMT 3886 (Doc no:-PMT-JH/18 44405) valid until 22 July 2019</p> <p><u>REM Estate</u></p> <p>a) MPOB License 501259002000 valid until 31/3/2019</p> <p>b) Peraturan – Peraturan Kawalan Bekalan 1974 Peraturan9(2) – Diesel Permit valid until 11/4/2019</p> <p>c) Permit Pemotongan gaji:-</p> <p>i) Masjid Surau(PP3/29/110/2004)</p> | |
|--|--|---|--|

| Criterion / Indicator | Assessment Findings | Compliance |
|-----------------------|--|------------|
| | <ul style="list-style-type: none"> ii) MAA Ins (PP3/29/111/2004) iii) Bas Sekolah(PP3/29/113/2004) d) Permit Weight & Measurement – B1457551 e) Air Compressor – JH PMT 17786 valid 26/7/2019 f) KPDNKK for Petrol under series no J030292 valid from 25/4/2018 – 24/10/2019 g) Oil dash pot o/c & e/f protection relay test report – valid from 1/4/2017-10/4/2019 <p><u>Sindora Estate</u></p> <ul style="list-style-type: none"> a) MPOB License 501863602000 valid until 30/11/2018 b) Permit Pemotongan gaji:- <ul style="list-style-type: none"> - EON CMG Ins,water,electricity, Kasih Rakyat Insurance, Tabung Haji (JTG/KG/1010305035) c) Air Compressor – JH PMT 22736 valid 22/7/2019 <p>Thus, a major non-conformance was raised.</p> | |
| 2.1.2 | <p>A documented system, which includes written information on legal requirements, shall be maintained.</p> <p>- Minor compliance -</p> | Complied |
| 2.1.3 | <p>A mechanism for ensuring compliance shall be implemented.</p> <p>- Minor compliance -</p> | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|---|------------|
| 2.1.4 | A system for tracking any changes in the law shall be implemented. - Minor compliance - | Tracking system available to identify changes in the relevant regulations through head office under. Risk Management and Compliance Department and site representative. Tracking system on any changes in the law been well implemented. For Sindora Complex, the person in charge is Regional Controller executive. Refer to appointment letter, ref: (005)KMB/RMCD/PRC -2017 dated 31/5/17. | Complied |
| Criterion 2.2: The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights. | | | |

| Criterion / Indicator | Assessment Findings | Compliance | | | | | | | | | | | | | | | | |
|---|--|---|----------------------|-------------|---------------|------------------------------------|--|---|----------------------|------------|-----------------|-------------|---------------|----------------------------|------------------|--------------------------------------|----------------------|-----------------|
| 2.2.1 Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance - | <p>Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land was made available during audit.</p> <p>Sungai Papan Estate</p> <p>Total of 17 lease hold land titles. Sample of land title checked:</p> <table border="1" data-bbox="1028 588 1659 852"> <thead> <tr> <th>Land title</th> <th>Legal ownership</th> <th>Land tenure</th> <th>Land use type</th> </tr> </thead> <tbody> <tr> <td>No.HSD 13177, HSD13163, HSD 13176.</td> <td>Mahamurni Plantations Sdn Bhd subsidiary of Kulim (M) Berhad</td> <td>Leasehold (99 years, ended on 22/9/2090</td> <td>Oil palm cultivation</td> </tr> </tbody> </table> <p>REM Estate</p> <p>Total of 15 lease hold land titles. Sample of land title checked:</p> <table border="1" data-bbox="1028 997 1659 1225"> <thead> <tr> <th>Land title</th> <th>Legal ownership</th> <th>Land tenure</th> <th>Land use type</th> </tr> </thead> <tbody> <tr> <td>65019, 65018, 91216, 88831</td> <td>Kulim (M) Berhad</td> <td>Leasehold (999 years, ended on 2911.</td> <td>Oil palm cultivation</td> </tr> </tbody> </table> | Land title | Legal ownership | Land tenure | Land use type | No.HSD 13177, HSD13163, HSD 13176. | Mahamurni Plantations Sdn Bhd subsidiary of Kulim (M) Berhad | Leasehold (99 years, ended on 22/9/2090 | Oil palm cultivation | Land title | Legal ownership | Land tenure | Land use type | 65019, 65018, 91216, 88831 | Kulim (M) Berhad | Leasehold (999 years, ended on 2911. | Oil palm cultivation | <p>Complied</p> |
| Land title | Legal ownership | Land tenure | Land use type | | | | | | | | | | | | | | | |
| No.HSD 13177, HSD13163, HSD 13176. | Mahamurni Plantations Sdn Bhd subsidiary of Kulim (M) Berhad | Leasehold (99 years, ended on 22/9/2090 | Oil palm cultivation | | | | | | | | | | | | | | | |
| Land title | Legal ownership | Land tenure | Land use type | | | | | | | | | | | | | | | |
| 65019, 65018, 91216, 88831 | Kulim (M) Berhad | Leasehold (999 years, ended on 2911. | Oil palm cultivation | | | | | | | | | | | | | | | |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|---|------------|
| 2.2.2 | Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance - | The legal boundaries were clearly demarcated at all visited estate. During site visit, it was found at Sindora Estate, the boundary was marked accordingly with colour peg (blue and white) at P16B (boundary with BAKAJ) and P17B (boundary with Hutan Rizab Kluang). Sg Papan Estate The boundary was marked accordingly with colour peg (red and white) at P04 (boundary with Kg Muhibah). REM Estate Boundary marker is clearly visible and demarcated at P16/3 which adjacent to smallholder farm. Boundary peg# 73 painted with red and white was observed at site. | Complied |
| 2.2.3 | Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance - | There was a request by local school on status of land allocated for school. Based on letter ref. # PROP/LAND ISSUE/LDG. SG. PAPAN/321 (VOL 1A)/8-17/1; Date: 17/8/2017; Ref. Title: <i>Memohon Mengurus Secara Persendirian Tanah Wakaf Sekolah</i> ; By: <i>Guru Besar Sekolah Kebangsaan Sungai Papan</i> . No dispute issue since Kulim management agreed to allow school to have the ownership and manage the land as per letter sighted. | Complied |
| 2.2.4 | There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance | There's no any other conflict within Sindora complex including at Sungai Papan Estate where Kulim management resolved the request by school and accepted by all parties involved. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|---|-------------------|
| 2.2.5 | For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance | There's no any other conflict within Sindora complex including at Sungai Papan Estate where Kulim management involved the participation by school for mapping and accepted by all parties involved. | Complied |
| 2.2.6 | To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance | There's no any other conflict within Sindora complex including at Sungai Papan Estate where Kulim management resolved the request by school and accepted by all parties involved in peace. | Complied |
| Criterion 2.3: | | | |
| Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent. | | | |
| 2.3.1 | Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance - | Maps of appropriate scale showing extent of recognized legal rights was established within Sindora complex including at Sungai Papan Estate where Kulim management involved the participation by school for mapping and accepted by all parties involved. | Complied |

| Criterion / Indicator | Assessment Findings | Compliance |
|---|--|-----------------|
| <p>2.3.2 Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include:</p> <p>a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making;</p> <p>b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken;</p> <p>c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land.</p> <p>- Minor compliance -</p> | <p>Kulim has developed the procedure i.e. SPO on Negotiations Concerning Compensation Program dated 04/09/2007. There is no land dispute issue occurred including at Sungai Papan Estate where Kulim management resolved the request by school and accepted by all parties involved.</p> | <p>Complied</p> |
| <p>2.3.3 All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>-Minor compliance</p> | <p>There was a request by local school on status of land allocated for school. Based on letter ref. # PROP/LAND ISSUE/LDG. SG. PAPAN/321 (VOL 1A)/8-17/1; Date: 17/8/2017; Ref. Title: <i>Memohon Mengurus Secara Persendirian Tanah Wakaf Sekolah</i>; By: <i>Guru Besar Sekolah Kebangsaan Sungai Papan</i>. No dispute issue since Kulim management agreed to allow school to have the ownership and manage the land as per letter sighted.</p> | <p>Complied</p> |
| <p>2.3.4 Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel.</p> <p>-Major compliance</p> | <p>It was evidence based on the letter and interview that the school represented by their own school headmaster.</p> | <p>Complied</p> |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | |
|---|--|--|------------|--------|----|-------|------|-----|--------|-----|------|--------|--------|----------|----------|
| Principle 3: Commitment to long-term economic and financial viability | | | | | | | | | | | | | | | |
| Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability. | | | | | | | | | | | | | | | |
| 3.1.1 | A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance - | Sindora Palm Oil Mill (SPOM) and supply bases have established and implemented its commitment to long term sustainability and improvements through a capital expenditure programme. Budget and 5 years management plan (projections 2019- 2024) was verified during the audit. Sindora Palm Oil Mill and supply bases have made progress towards achieving their performance production targets for the current financial year. Sample of CAPEX for 2019: i) Sindora POM – air pollution control system/ESP ii) Burner system c/w piping (mixed fuel modification) iii) T29 Tractor Eurostar – FFB evacuation iv) New and replacement house furnit | Complied | | | | | | | | | | | | |
| 3.1.2 | An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance - | The replanting programme was established. Sighted Replanting Programme 2018-2043: <table border="1" data-bbox="1025 979 1659 1082"> <thead> <tr> <th>Year</th> <th>Estate</th> <th>Ha</th> <th>Field</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>REM</td> <td>117.27</td> <td>P92</td> </tr> <tr> <td>2019</td> <td>Estate</td> <td>238.45</td> <td>P93, P91</td> </tr> </tbody> </table> At Sg Papan Estate, there is no replanting until 2027. | Year | Estate | Ha | Field | 2018 | REM | 117.27 | P92 | 2019 | Estate | 238.45 | P93, P91 | Complied |
| Year | Estate | Ha | Field | | | | | | | | | | | | |
| 2018 | REM | 117.27 | P92 | | | | | | | | | | | | |
| 2019 | Estate | 238.45 | P93, P91 | | | | | | | | | | | | |
| Principle 4: Use of appropriate best practices by growers and millers | | | | | | | | | | | | | | | |
| Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored. | | | | | | | | | | | | | | | |

| | | | |
|--------------|--|--|-----------------|
| <p>4.1.1</p> | <p>Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -</p> | <p>SPOM has revised and update its documentation in line with ISO 14001 and ISO 9001 transition. An Integrated Management Manual (SNPOM/QM/0), dated: 1/1/18 was reviewed and verified. For mill operation, SOP Core Process (SNPOM/SOP/8) issue:3, dated 1/1/18 has detailed out mill's core processes which covers for all mill's day to day operation. For example for mill SOPs;</p> <ul style="list-style-type: none"> i) SNPOM/SOP/8.5, Sterilization Station ii) SNPOM/SOP/8.6, Threshing /Pressing & EFB Station iii) SNPOM/SOP/8.13, Water Treatment iv) SNPOM/SOP/8.14, Effluent Treatment Plant v) Sustainable Management System, Traceability, Doc. No: SQD/SMS/1.2 Date 1 July 2018 and SOP: CSPO Supply Chain Rev: 00 Procedure No: MKD/001 dated 08 February 2012. <p>Work Instructions (WI) have been derived from SOPs and displayed at work stations at the mill and at pertinent locations at the estates, such as the Muster Notice Boards.</p> <ul style="list-style-type: none"> i) SNPOM /WI/9, Operational control – Waste Management ii) SNPOM /WI/5, Control of black smoke emission iii) SNPOM /WI/28, Working at confined space iv) SNPOM /WI/27, Working at height place <p>Work Instructions have been derived from SOPs and it were displayed at work stations at the mill and at certain locations at the estates, such as the Muster Notice Boards. Eg: SM/WI/10: Boiler Station, SM/WI/12: Power House, SM/WI/13: Laboratory Manual, SM/WI/22: Waste Management, SM/WI/23: Handling chemicals, SM/WI/25: Usage of hearing protection device, SM/WI/29: Emergency Response Procedure, SM/WI/30: Maintenance and servicing of oil trap, SM/WI/34: Confined Space Management, SOP Harvesting, SOP Spraying, SOP: Manuring, SOP: Workshop, SOP:</p> | <p>Complied</p> |
|--------------|--|--|-----------------|

RSPO Public Summary Report
Revision 7 (Aug /2018)

| Criterion / Indicator | Assessment Findings | Compliance |
|-----------------------|---|------------|
| | <p>Working at Height, SOP: Oxy-Acetylene Set, SOP: Welding, SOP:Mechanical Buffalo, and others.</p> <p>Kulim (M) Berhad Agricultural Manual has established covers Replanting, roads drains Bridges culverts and fences, construction of estate building, manuring including POME and Bio compost, harvesting, pruning and ablation, soil conservation, justification of chemical use, weed management, integrated pest management and plant diseases. There are 19 SOPs and 18 WI's covering all aspects of oil palm management including composting site operation.</p> | |

| <p>4.1.2</p> | <p>A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -</p> | <p>Mechanism to check consistent implementation of procedure is through Internal Audit, Mill Inspector and Estate Inspector Visit. Internal Audit is planned twice a year by Sustainability Department, refer to internal audit carried out at specific operating units;</p> <table border="1" data-bbox="1032 507 1825 719"> <thead> <tr> <th>Operating Units</th> <th>Audit date</th> <th>Finding/NC status</th> </tr> </thead> <tbody> <tr> <td>Sindora POM</td> <td>30/7/18</td> <td>No NC raised</td> </tr> <tr> <td>Sg Papan Estate</td> <td>26/7/18</td> <td>No NC raised.</td> </tr> </tbody> </table> <p>Mill Inspectorate Visit for Sindora Palm Oil Mill (SPOM) was conducted on 25/7/18 by Mill Inspectorate Office under Kulim Group of company. Refer to report, MJAB/SNPOM/4/2018.</p> <p>3rd party bi-annual compliance audit was carried by DOE registered consultant, EA0067, EA0091) in 2018</p> <table border="1" data-bbox="1032 963 1662 1369"> <thead> <tr> <th>Date of assessment</th> <th>Report reference</th> <th>Compliance Status</th> </tr> </thead> <tbody> <tr> <td>2nd half 2018, 19/9/18</td> <td>Consultant: EHS Alliance Sdn Bhd, pending from consultant</td> <td>Pending from consultant</td> </tr> <tr> <td>1st half of 2018 (5/2/18)</td> <td>Consultant: EHS Alliance Sdn Bhd, report dated 6/2/18</td> <td>No non-conformity raised, 4</td> </tr> </tbody> </table> | Operating Units | Audit date | Finding/NC status | Sindora POM | 30/7/18 | No NC raised | Sg Papan Estate | 26/7/18 | No NC raised. | Date of assessment | Report reference | Compliance Status | 2nd half 2018, 19/9/18 | Consultant: EHS Alliance Sdn Bhd, pending from consultant | Pending from consultant | 1st half of 2018 (5/2/18) | Consultant: EHS Alliance Sdn Bhd, report dated 6/2/18 | No non-conformity raised, 4 | <p>Complied</p> |
|---------------------------|---|---|-----------------|------------|-------------------|-------------|---------|--------------|-----------------|---------|---------------|--------------------|------------------|-------------------|------------------------|---|-------------------------|---------------------------|---|-----------------------------|-----------------|
| Operating Units | Audit date | Finding/NC status | | | | | | | | | | | | | | | | | | | |
| Sindora POM | 30/7/18 | No NC raised | | | | | | | | | | | | | | | | | | | |
| Sg Papan Estate | 26/7/18 | No NC raised. | | | | | | | | | | | | | | | | | | | |
| Date of assessment | Report reference | Compliance Status | | | | | | | | | | | | | | | | | | | |
| 2nd half 2018, 19/9/18 | Consultant: EHS Alliance Sdn Bhd, pending from consultant | Pending from consultant | | | | | | | | | | | | | | | | | | | |
| 1st half of 2018 (5/2/18) | Consultant: EHS Alliance Sdn Bhd, report dated 6/2/18 | No non-conformity raised, 4 | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | | Compliance | | | | | | | | | | | | |
|-----------------------|--|---|---------------------|----------------------|------------|----------------|----------|-----------|-----|------------|------------|-------|----------------|------------|-----|--|
| | | | observation raised. | | | | | | | | | | | | | |
| | | <p>Based on the latest compliance audit results, Sindora POM has continuously complied with the requirements under "Jadual Pematuhan". Observation raised in the previous compliance audit has been rectified resulting improvement of OBS raised in the recent audit.</p> <p>Plantation Inspectorate visit carried out for the latest financial year of 2018. Summary of PI visit rating:</p> <table border="1"> <thead> <tr> <th>Estates</th> <th>Visit Date</th> <th>Overall rating</th> </tr> </thead> <tbody> <tr> <td>Sg Papan</td> <td>6-17/8/18</td> <td>84%</td> </tr> <tr> <td>REM Estate</td> <td>15-16/7/18</td> <td>83.5%</td> </tr> <tr> <td>Sindora Estate</td> <td>18-19/9/18</td> <td>89%</td> </tr> </tbody> </table> | | Estates | Visit Date | Overall rating | Sg Papan | 6-17/8/18 | 84% | REM Estate | 15-16/7/18 | 83.5% | Sindora Estate | 18-19/9/18 | 89% | |
| Estates | Visit Date | Overall rating | | | | | | | | | | | | | | |
| Sg Papan | 6-17/8/18 | 84% | | | | | | | | | | | | | | |
| REM Estate | 15-16/7/18 | 83.5% | | | | | | | | | | | | | | |
| Sindora Estate | 18-19/9/18 | 89% | | | | | | | | | | | | | | |
| 4.1.3 | Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance - | <p>Records of monitoring and any action taken were maintained. Refer related report under the above indicator 4.1.2.</p> <p>For EHS related monitoring records, permit to work has been implemented for internal and external works. Sample of working at height and confined space activities permit checked:</p> <p>Permit to work (contractor and internal workers)</p> <p>i)Furnace Staging Erection: 7/5/17</p> <p>ii)Tube and mud drum cleaning: 11/5/18</p> <p>AE health declaration record and monitoring mechanism for erected staging/scaffolding was not available. Thus, a minor NC was raised.</p> | | Minor nonconformance | | | | | | | | | | | | |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|---|------------|
| 4.1.4 | The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance - | <p>Records of the origins of all third-party sourced FFB were verified. Summary of FFB received based on weighbridge record as at to date checked. There were total of 6 OCP registered under Sindora POM for 3rd party FFB suppliers. Sample of registered FFB supplier checked:</p> <p>Perniagaan Md Sangidi – annual revision, refer 20/11/17 and valid for one year, 31/12/18. MPOB license (buy, sell and transport) 5064620150000, valid until 31/3/19. Weighbridge records, DO#13930, lorry: JPQ 7231, dated 30/9/18, weight: 27.99 mt</p> <p>Kind Action (M) Sdn Bhd – annual revision, refer 1/1/18 and valid for one year, 31/12/18. MPOB license (buy, sell and transport) 511574002000, valid until 30/4/19. Weighbridge records, DO#1743708, lorry: JDQ1206, dated 25/9/18, weight: 5.84 mt.</p> | Complied |
| <p>Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p> | | | |

| Criterion / Indicator | Assessment Findings | Compliance | |
|-----------------------|--|---|----------|
| 4.2.1 | <p>There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible.</p> <p>- Minor compliance -</p> | <p>Kulim (M) Berhad Agriculture Manual has established covers Replanting, roads drains Bridges culverts and fences, construction of estate building, manuring, harvesting, pruning and ablation, soil conservation, justification of chemical use, weed management, integrated pest management and plant diseases. There are 19 SOPs and 18 WI's covering all aspects of oil palm management. The related SOP, namely Leaf and Soil Sampling Notes procedure was sighted. New revised Agriculture Manual dated 31/10/17 was sighted under A07-02-Planting Terrace and A20 – Standard Operating Guidelines For Conversion of Oil Crop Other Than Oil Palm To Oil.</p> <p>All estates operate in accordance with the Agriculture Manual and standard operating procedures. The practices consistently monitored by estate operation management and estate inspectorate. The recommendations for improvements are given to maintain the sustainable practices.</p> | Complied |

| | | | |
|--------------|---|---|-----------------|
| <p>4.2.2</p> | <p>Records of fertiliser inputs shall be maintained. - Minor compliance -</p> | <p>Fertilizers are applied as per agronomist recommendation. Record shows application date, filed number, dosage applied per palm, type of fertilizer and number of applicators.</p> <p><u>Sg Papan Estate</u> Agronomist report by R&D department dated 21/9/2017, fertilizer recommendation 2017 was done by agronomist :</p> <ol style="list-style-type: none"> 1. Compound (KKS44B) : 33.2 mt 2. ERP: 9.96 mt 3. KIE: 9.96 mt 4. MIX2+ B: 33.2 mt <p>The latest application (2nd programme) was carried out at P12/02 for MIX2+ B (2.5 kg/palm) and has been completed on 19/9/18 (332 bag x 50 kg/bag)</p> <p><u>REM Estate</u> Agronomist report by R&D department dated 12-13/2/2018, fertilizer recommendation for 2018 (Feb, Mar, May, June, July, Aug and Oct)</p> <p>The latest application was carried out at P04A for AS (1 kg/palm) and has been completed on March 2018 (105 bag x 50 kg/bag)</p> <p><u>Sindora Estate</u> Agronomist report by R&D department dated 14/9/2018, fertilizer recommendation for 2018 (Feb, Apr, May, June and September)</p> <p>The latest application was carried out at P08/1B for MIX2+ B (2.25 kg/palm) and has been completed on September 2018 (332 bag x 50 kg/bag)</p> | <p>Complied</p> |
|--------------|---|---|-----------------|

RSPO Public Summary Report
Revision 7 (Aug /2018)

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | |
|-----------------------|---|--|------------|--------------------------|--------------------------|-----------------|---|---|------------|--|-----------------------------------|----------------|--|---|----------|
| 4.2.3 | There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance - | <p>Foliar and soil sampling was carried out by Internal Agronomist from Agronomy Advisory and Services Department prior to the fertilizer recommendation for the next financial year. Leaf and soil nutrient analysis are commonly used in the diagnosis of fertilizer requirements in oil palms. The frequency for leaf sampling must be conduct for every year while for soil analysis, the frequency for soil sampling is conducted at 5 years intervals (Leaf and Soil Sampling Notes Procedure-Kulim (M) Bhd). Analysis reports were summarized as per below:</p> <table border="1"> <thead> <tr> <th>Estates</th> <th>Foliar analysis (yearly)</th> <th>Soil Sampling (5 yearly)</th> </tr> </thead> <tbody> <tr> <td>Sg Papan Estate</td> <td>Report ref:L1/1710/SP/126 9-1278 dated 11/10/17</td> <td>Report ref: SI/1809/0221-0224 dated 16/8/18</td> </tr> <tr> <td>REM Estate</td> <td>Report ref: i)L1/1801/REM/006 8-0071 ii)L1/1801/REM/00 50-0057</td> <td>Report ref: SI/1801/0001-0004-(1)</td> </tr> <tr> <td>Sindora Estate</td> <td>Report ref:L1/1710/SIN/13 85-1394 dated 17/10/17</td> <td>Report ref: SI/1711/0337-0340 dated 1/11/17</td> </tr> </tbody> </table> | Estates | Foliar analysis (yearly) | Soil Sampling (5 yearly) | Sg Papan Estate | Report ref:L1/1710/SP/126 9-1278 dated 11/10/17 | Report ref: SI/1809/0221-0224 dated 16/8/18 | REM Estate | Report ref: i)L1/1801/REM/006 8-0071 ii)L1/1801/REM/00 50-0057 | Report ref: SI/1801/0001-0004-(1) | Sindora Estate | Report ref:L1/1710/SIN/13 85-1394 dated 17/10/17 | Report ref: SI/1711/0337-0340 dated 1/11/17 | Complied |
| Estates | Foliar analysis (yearly) | Soil Sampling (5 yearly) | | | | | | | | | | | | | |
| Sg Papan Estate | Report ref:L1/1710/SP/126 9-1278 dated 11/10/17 | Report ref: SI/1809/0221-0224 dated 16/8/18 | | | | | | | | | | | | | |
| REM Estate | Report ref: i)L1/1801/REM/006 8-0071 ii)L1/1801/REM/00 50-0057 | Report ref: SI/1801/0001-0004-(1) | | | | | | | | | | | | | |
| Sindora Estate | Report ref:L1/1710/SIN/13 85-1394 dated 17/10/17 | Report ref: SI/1711/0337-0340 dated 1/11/17 | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | | | | Compliance |
|---|---|--|-------------|----------------------------------|---------------------------------------|------------|
| 4.2.4 | A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance - | POME and composting were applied as per agricultural manual: 1. D05: EFB Utilization at rate 50mt/ha. 2. D08: Bio-compost application at the rate of 7mt/ha or 50kg/palm on selected area. | | | | Complied |
| | | Estate | Amount | Type | Remark | |
| | | REM estate | 4,925.83 mt | Manual application (bio-compost) | Field P04A, P91, P93, P10, P93P, P12. | |
| | | Sindora Estate | 7502.04 | Manual application (bio-compost) | P06, P07, P12, P08, P10, P13 | |
| | | There was no application of Bio-compost at Sg Papan Estate. | | | | |
| Criterion 4.3: Practices minimise and control erosion and degradation of soils. | | | | | | |

| <p>4.3.1</p> | <p>Maps of any fragile soils shall be available. - Major compliance -</p> | <p>Soil series map available for both estates visited. No other soil categorised as problematic or fragile soil. Sighted the type of soil available at SE and Sg Papan Estate.</p> <table border="1" data-bbox="1032 475 1825 1005"> <thead> <tr> <th>No.</th> <th>Type of Soil</th> </tr> </thead> <tbody> <tr><td>1</td><td>Kompleks Aluvium Sungai</td></tr> <tr><td>2</td><td>Siri Rengam</td></tr> <tr><td>3</td><td>Siri Batu Lapan</td></tr> <tr><td>4</td><td>Siri Bungor</td></tr> <tr><td>5</td><td>Siri Gong Chenak</td></tr> <tr><td>6</td><td>Siri Jelutong</td></tr> <tr><td>7</td><td>Siri Padang Besar</td></tr> <tr><td>8</td><td>Siri Tok Yong</td></tr> <tr><td>9</td><td>Siri Tai Tak</td></tr> <tr><td>10</td><td>Siri Tebok</td></tr> <tr><td>11</td><td>Siri Sabrang</td></tr> <tr><td>12</td><td>Siri Keranji</td></tr> <tr><td>13</td><td>Siri Holyrood</td></tr> <tr><td>14</td><td>Siri Lanchang</td></tr> </tbody> </table> <p>REM Estate</p> <p>Soil map available for review. Refer to soil map dated 29/11/16</p> <table border="1" data-bbox="1032 1152 1825 1385"> <thead> <tr> <th>No.</th> <th>Type of Soil</th> </tr> </thead> <tbody> <tr><td>1</td><td>Kesatuan Rengam-Bungor</td></tr> <tr><td>2</td><td>Siri Batu Lapan</td></tr> <tr><td>3</td><td>Siri Bungor</td></tr> <tr><td>4</td><td>Siri Gong Chenak</td></tr> <tr><td>5</td><td>Siri Jelutong</td></tr> <tr><td>6</td><td>Siri Padang Besar</td></tr> </tbody> </table> | No. | Type of Soil | 1 | Kompleks Aluvium Sungai | 2 | Siri Rengam | 3 | Siri Batu Lapan | 4 | Siri Bungor | 5 | Siri Gong Chenak | 6 | Siri Jelutong | 7 | Siri Padang Besar | 8 | Siri Tok Yong | 9 | Siri Tai Tak | 10 | Siri Tebok | 11 | Siri Sabrang | 12 | Siri Keranji | 13 | Siri Holyrood | 14 | Siri Lanchang | No. | Type of Soil | 1 | Kesatuan Rengam-Bungor | 2 | Siri Batu Lapan | 3 | Siri Bungor | 4 | Siri Gong Chenak | 5 | Siri Jelutong | 6 | Siri Padang Besar | <p>Complied</p> |
|--------------|---|--|-----|--------------|---|-------------------------|---|-------------|---|-----------------|---|-------------|---|------------------|---|---------------|---|-------------------|---|---------------|---|--------------|----|------------|----|--------------|----|--------------|----|---------------|----|---------------|-----|--------------|---|------------------------|---|-----------------|---|-------------|---|------------------|---|---------------|---|-------------------|-----------------|
| No. | Type of Soil | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | Kompleks Aluvium Sungai | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Siri Rengam | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Siri Batu Lapan | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Siri Bungor | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | Siri Gong Chenak | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | Siri Jelutong | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | Siri Padang Besar | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | Siri Tok Yong | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 9 | Siri Tai Tak | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10 | Siri Tebok | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 11 | Siri Sabrang | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 12 | Siri Keranji | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 13 | Siri Holyrood | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 14 | Siri Lanchang | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| No. | Type of Soil | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | Kesatuan Rengam-Bungor | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Siri Batu Lapan | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Siri Bungor | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Siri Gong Chenak | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | Siri Jelutong | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | Siri Padang Besar | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | |
|-----------------------|---|--|----------------|-------------|---|--------------|---|------------|----|---------------|--|
| | | <table border="1"> <tr> <td>7</td> <td>Siri Rengam</td> </tr> <tr> <td>8</td> <td>Siri Tai Tak</td> </tr> <tr> <td>9</td> <td>Siri Tebok</td> </tr> <tr> <td>10</td> <td>Siri Tok Yong</td> </tr> </table> | 7 | Siri Rengam | 8 | Siri Tai Tak | 9 | Siri Tebok | 10 | Siri Tok Yong | |
| 7 | Siri Rengam | | | | | | | | | | |
| 8 | Siri Tai Tak | | | | | | | | | | |
| 9 | Siri Tebok | | | | | | | | | | |
| 10 | Siri Tok Yong | | | | | | | | | | |
| 4.3.2 | A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance - | Sighted slope map (Slope Classification Map). Slope area constructed with terrace and stop bund. Planting terraces had been constructed where slope >7°. Fields are established with cover crops such as mucunna and others. | Complied | | | | | | | | |
| 4.3.3 | A road maintenance programme shall be in place. - Minor compliance - | Estates has implemented annual road and bridges programme. Example of programme checked at Sindora and Sg Papan estates shows the file road programme indicating road repairs and maintenance for the whole estate roads includes grading, compacting and to strengthen the road surface with crusher run. | Complied | | | | | | | | |
| 4.3.4 | Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance - | Not applicable. There is no peat soil or soil categorised as problematic or fragile soil at both estates. | Not applicable | | | | | | | | |
| 4.3.5 | Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance - | Not applicable. There is no peat soil or soil categorised as problematic or fragile soil at both estates. | Not applicable | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|---|-------------------|
| 4.3.6 | A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance - | Not applicable. There is no peat soil or soil categorised as problematic or fragile soil at both estates. | Not applicable |
| Criterion 4.4: Practices maintain the quality and availability of surface and ground water. | | | |

| Criterion / Indicator | Assessment Findings | Compliance |
|---|--|-----------------|
| <p>4.4.1</p> <p>An implemented water management plan shall be in place. - Minor compliance -</p> | <p>Sindora Certification Unit has established and implement water management plan monitor water quality of outgoing waters to identify any adverse effect from the mill and estate activities. Refer plan dated 1 August 2018. The plan takes into account the efficient use of resources, ensure amongst other that the use of water did not impact on other users, avoid contamination of ground and surface water, and appropriate treatment of mill effluent. The sampling analysis has been conducted for both outgoing water and drinking water. Among management plan implemented for 2018:</p> <p>i)To monitor water pollution Upstream and downstream river water analysis – once in every license period. Monitoring of Sungai Mengkibol was done on 7/8/18, refer to report no. WI/1808/0812-0813 dated 30/8/18. All parameters tested are within the standard as per Compliance Schedule.</p> <p>Drinking water sampling was done for raw & treated water Quality and taken at 2 sampling points; DW-R Drinking Water Collected at Inlet (Raw) and DW-T Drinking Water Collected at Outlet (Treated). Refer to report, LW/324/18 dated 6/6/18. All parameter tested are in compliance with NWQS.</p> <p>The mill has maintained monitoring records of water usage which recorded every day and summarised on monthly basis including the monitoring of rainfall water, which has been an alternative source of water as mitigation plan during draught season</p> | <p>Complied</p> |

| Criterion / Indicator | Assessment Findings | Compliance |
|-----------------------|--|-----------------|
| <p>4.4.2</p> | <p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -</p> <p>Based on the company’s Agricultural Manual (Section A: Replanting, A17-Protection of Natural Water Courses, Updated on 1/7/2013), established river buffer zones as per MPOB’s guideline: i) River width > 40m; river buffer = 50m ii) River width 20 - 40m; river buffer = 40m iii) River width 10 -20m; river buffer = 20m iv) River width 5 - 10m; river buffer = 10m v) River width < 5m; river buffer = 5m</p> <p>Buffer zones had been maintained on both sides of rivers/streams in the estates as verified during on-site field inspection. There was no evidence of spraying around palms marked as boundary for the buffer zones. There was also no construction of bunds/ weirs/dams across the main rivers or waterways passing through the estates.</p> <p>All the estates assessed has prepared map showing riparian buffer zones and demarcated the areas prior to replanting for all the estates. Field inspection confirmed that the buffer zone beside the stream has been demarcated clearly and maintained. River water analysis was carried out to check ensure protection of water course within estates.</p> <p><u>Sg Papan Estate</u></p> <p>Water analysis (2 monitoring points) tributaries of Sg Lebam at P08/01 (in-coming) and P07/01 (out-going). 2 parameters tested were Phosphate and Nitrate Nitrogen. All parameter tested were in compliance with National Water Quality Standard, Class III. Refer to test report, dated 5/9/18; WI/1809/0867-0868 sampling date 27/8/18</p> | <p>Complied</p> |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | |
|-----------------------|--|--|------------------|------|------|------|-----------|----|----|----|----------|
| 4.4.3 | <p>Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6).</p> <p>- Minor compliance -</p> | <p>Treatment of mill effluent carried out as per SOP Doc no SNPOM/SOP/8.14 dated 1 January 2018 and DOE license requirements with regular monitoring of discharge quality on Biochemical Oxygen Demand (BOD) is monitored. Results of BOD monitoring as per stipulated frequency was in compliance as follows:</p> <p>i) Storm water retention pond analysis (BOD analysis fortnightly) Latest monitoring by UTCL Laboratory, dated 16 August 2018, report no: EI/1808/0710-0712. Sampling dated 5 August 2018. Sampling area:</p> <ul style="list-style-type: none"> iv) EI – 0710 (Storm Pond) v) EI – 0711 (Interceptor no 5) vi) EI – 0712 (Monsoon Drain) <table border="1" data-bbox="1025 815 1823 949"> <thead> <tr> <th>Parameter (unit)</th> <th>0710</th> <th>0711</th> <th>0712</th> </tr> </thead> <tbody> <tr> <td>BOD(mg/L)</td> <td>64</td> <td>60</td> <td>28</td> </tr> </tbody> </table> <p>ii) Quarterly return via Online Environmental Reporting (OER) and monthly effluent analysis Latest quarter, April - June 2018, submitted on 16/7/2018. 1st(9/4/2018), 5th (16/5/2018) and 9th (20/6/2018) week analysis results were submitted no off-limit parameter recorded.</p> | Parameter (unit) | 0710 | 0711 | 0712 | BOD(mg/L) | 64 | 60 | 28 | Complied |
| Parameter (unit) | 0710 | 0711 | 0712 | | | | | | | | |
| BOD(mg/L) | 64 | 60 | 28 | | | | | | | | |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | |
|---|---|---|------------|-------------------------|------|------------|------|------------|---------------|------------|----------|
| 4.4.4 | Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance - | <p>Sindora POM monitored its water consumption on monthly basis for the source of water supply for its mill process usage. Summary of water consumption as per below:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Water consumption ratio</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td>1.36 m3/mt</td> </tr> <tr> <td>2017</td> <td>0.97 m3/mt</td> </tr> <tr> <td>2018 (todate)</td> <td>0.44 m3/mt</td> </tr> </tbody> </table> | Year | Water consumption ratio | 2016 | 1.36 m3/mt | 2017 | 0.97 m3/mt | 2018 (todate) | 0.44 m3/mt | Complied |
| Year | Water consumption ratio | | | | | | | | | | |
| 2016 | 1.36 m3/mt | | | | | | | | | | |
| 2017 | 0.97 m3/mt | | | | | | | | | | |
| 2018 (todate) | 0.44 m3/mt | | | | | | | | | | |
| <p>Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.</p> | | | | | | | | | | | |
| 4.5.1 | Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance - | IPM Manual includes the planting of beneficial plants and control of damage by rodents, leaf-eaters, orytes and natural enemies. Beneficial plants such as Turnera subulata, Antigonon Leptopus and Cassia Cobanensis are grown in the estates. Records of planting of new areas and maintenance of existing areas of beneficial plants, location maps and barn owl census are available. | Complied | | | | | | | | |
| 4.5.2 | Training of those involved in IPM implementation shall be demonstrated. - Minor compliance - | Training for those involve with IPM implementation was conducted accordingly. Training records for staff and workers on IPM implementation were available and verified to be satisfactory during on-site assessment. # cross refer with indicator 4.8.2 | Complied | | | | | | | | |
| <p>Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment</p> | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | | | | Compliance | |
|-----------------------|--|--|----------------|----------------|----------------|------------|------|
| 4.6.1 | Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance - | Justification of pesticides applied is available in the agriculture manual. Refer to agriculture manual 31/10/2017, H01: Justification of Chemical Use. The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimize effect on non-target species. | | | | Complied | |
| 4.6.2 | Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance - | Records of pesticides and their active ingredients used, LD50, area treated, amount of a.i. applied per ha, and number of applications was maintained. | | | | Complied | |
| | | 2015 a.i/ha | 2016 a.i/ha | 2017 a.i/ha | 2018 a.i/ha | | |
| | | SE | 1.68 | 2.30 | 1.34 | | 1.10 |
| | | SPE | 0.11 | 0.84 | 1.12 | | 0.16 |
| | | REM E | | | 1.21 | 0.26 | |

| Criterion / Indicator | Assessment Findings | Compliance |
|--|--|-----------------|
| <p>4.6.3</p> <p>Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines.</p> <p>- Major compliance -</p> | <p>The quantity of agrochemicals required for various field conditions are documented and justified in Kulim’s Agriculture Manual. The implementation in the field is consistent with the manual. There is no prophylactic use of pesticides.</p> <p>IPM implementation</p> <p><u>Sg Papan Estate</u> Have barn owl box (latest census is on 13/9/2018), rat bait programme and beneficial plant (target to planting 1170 Beneficial plant)</p> <p><u>REM Estate</u> In REM estate for reduction of chemical using, IPM is implement such as Pheromone trap, Beneficial plant and Barn Owl Box (Census last on 23/8/2018).</p> <p><u>Sindora Estate</u> Beneficial plant programme (to planting 422 plant on august at P17B) and for barn owl box last census is record is 75% occupancy)</p> | <p>Complied</p> |
| <p>4.6.4</p> <p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances.</p> <p>- Minor compliance -</p> | <p>Kulim (M) Bhd has stopped paraquat usage since February 2015. Alternatives such as Glyphosate were used. The implementation in the field is consistent with the SOP.</p> | <p>Complied</p> |

| Criterion / Indicator | Assessment Findings | Compliance |
|---|---|------------|
| 4.6.5 Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance - | Pesticide operators given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers. In Sg Papan estate, training record for chemical handling training is available in training file latest training date is 26 September 2018 and 18 March 2018 conducted by Mohd Abdul Wahib Bin Nawawi . | Complied |
| 4.6.6 Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance - | The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation. SOP triple rinsing is available dated 18 May 2018 under Title <i>Panduan Kerja Selamat Dibawah Akta Keselamatan Dan Kesihatan Pekerjaan 1994</i> . The Disposal will be dispose at G – Planter and Kualiti Alam Sdn Bhd. | Complied |

| <p>4.6.7</p> | <p>Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -</p> | <p>he quantity of agrochemicals required for various field conditions are documented and justified in Agriculture Manual, Section I: Weeds Management. The implementation in the field is consistent with the Agriculture Manual. Spraying application record and PPE record (refer 4.7.2) that been given as per below verification:-</p> <p><u>Sg Papan estate</u></p> <table border="1"> <thead> <tr> <th>Weeding type</th> <th>Field</th> <th>Date</th> <th>PPE</th> </tr> </thead> <tbody> <tr> <td>Circle spraying</td> <td>P14/2</td> <td>28/9/2018</td> <td>Apron, Boot, Glove, Hard hat and mask(vapour type)</td> </tr> <tr> <td>Path (rotor slash)</td> <td>P05</td> <td>August 2018</td> <td>Hard hat and boot</td> </tr> </tbody> </table> <p><u>REM estate</u></p> <table border="1"> <thead> <tr> <th>Weeding type</th> <th>Field</th> <th>Date</th> <th>PPE</th> </tr> </thead> <tbody> <tr> <td>Circle spraying</td> <td>P16/2 40.33 ha</td> <td>27/8/2018</td> <td>Apron, Boot, Glove, Hard hat and mask(vapour type)</td> </tr> <tr> <td>Path (Rotor slash)</td> <td>P91</td> <td>SEPT 2018</td> <td>Hard hat and boot</td> </tr> </tbody> </table> <p><u>Sindora estate</u></p> <table border="1"> <thead> <tr> <th>Weeding type</th> <th>Field</th> <th>Date</th> <th>PPE</th> </tr> </thead> <tbody> <tr> <td>Circle spraying</td> <td>P12/4 37.23 ha</td> <td>20/8/2018</td> <td>Apron, Boot, Glove, Hard hat and mask(vapour type)</td> </tr> </tbody> </table> | Weeding type | Field | Date | PPE | Circle spraying | P14/2 | 28/9/2018 | Apron, Boot, Glove, Hard hat and mask(vapour type) | Path (rotor slash) | P05 | August 2018 | Hard hat and boot | Weeding type | Field | Date | PPE | Circle spraying | P16/2 40.33 ha | 27/8/2018 | Apron, Boot, Glove, Hard hat and mask(vapour type) | Path (Rotor slash) | P91 | SEPT 2018 | Hard hat and boot | Weeding type | Field | Date | PPE | Circle spraying | P12/4 37.23 ha | 20/8/2018 | Apron, Boot, Glove, Hard hat and mask(vapour type) | <p>Complied</p> |
|--------------------|--|---|--|-------|------|-----|-----------------|-------|-----------|--|--------------------|-----|-------------|-------------------|--------------|-------|------|-----|-----------------|----------------------|-----------|--|--------------------|-----|-----------|-------------------|--------------|-------|------|-----|-----------------|----------------------|-----------|--|-----------------|
| Weeding type | Field | Date | PPE | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Circle spraying | P14/2 | 28/9/2018 | Apron, Boot, Glove, Hard hat and mask(vapour type) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Path (rotor slash) | P05 | August 2018 | Hard hat and boot | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Weeding type | Field | Date | PPE | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Circle spraying | P16/2 40.33 ha | 27/8/2018 | Apron, Boot, Glove, Hard hat and mask(vapour type) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Path (Rotor slash) | P91 | SEPT 2018 | Hard hat and boot | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Weeding type | Field | Date | PPE | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Circle spraying | P12/4 37.23 ha | 20/8/2018 | Apron, Boot, Glove, Hard hat and mask(vapour type) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | | | | Compliance |
|-----------------------|---|---|------|-----------|--------------------------|------------|
| | | Path (Rotor slash) | P15A | 23/7/2018 | Hard hat and rubber boot | |
| 4.6.8 | Pesticides shall be applied aurally only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance - | No aerial spraying at all estates. | | | | Complied |
| 4.6.9 | Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance - | There is no associated smallholder at Sindora Certification Unit. Employees handling pesticide given knowledge and skill required to cover safe handling practices and standard operating procedures. | | | | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | |
|--------------------------|--|---|----------------|-----------------|----------|--|--------------------------|--|--------------|------------------------------|---------------|--|----------|
| 4.6.10 | Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance - | <p>Proper disposal of waste material is based on the established waste and pollution management plan dated 1 October 2018. Note SOP for waste disposal is available in Kulim Berhad, dated 3 September 2007 under title SPO Improvement Program for control waste.</p> <table border="1"> <thead> <tr> <th>Waste Material</th> <th>Disposal Method</th> </tr> </thead> <tbody> <tr> <td>Domestic</td> <td> <u>Sg Papan</u> Dispose in the land fill at field 03/01 <u>REM</u> Dispose in the land fill at field 10/01 <u>Sindora</u> Dispose in the land fill at Field P06/4 </td> </tr> <tr> <td>Plastic,Bottles,Clothing</td> <td> For all estate to be recycle, or landfill disposal, for chemical empty container dispose at G – Planter. Only for Sindora estate the disposal of SW 409 is under Kualiti Alam Sdn Bhd. </td> </tr> <tr> <td>Garden waste</td> <td>Dispose at Frond staking row</td> </tr> <tr> <td>Kitchen waste</td> <td>Disposed at Landfill for each operating unit</td> </tr> </tbody> </table> | Waste Material | Disposal Method | Domestic | <u>Sg Papan</u> Dispose in the land fill at field 03/01 <u>REM</u> Dispose in the land fill at field 10/01 <u>Sindora</u> Dispose in the land fill at Field P06/4 | Plastic,Bottles,Clothing | For all estate to be recycle, or landfill disposal, for chemical empty container dispose at G – Planter. Only for Sindora estate the disposal of SW 409 is under Kualiti Alam Sdn Bhd. | Garden waste | Dispose at Frond staking row | Kitchen waste | Disposed at Landfill for each operating unit | Complied |
| Waste Material | Disposal Method | | | | | | | | | | | | |
| Domestic | <u>Sg Papan</u> Dispose in the land fill at field 03/01 <u>REM</u> Dispose in the land fill at field 10/01 <u>Sindora</u> Dispose in the land fill at Field P06/4 | | | | | | | | | | | | |
| Plastic,Bottles,Clothing | For all estate to be recycle, or landfill disposal, for chemical empty container dispose at G – Planter. Only for Sindora estate the disposal of SW 409 is under Kualiti Alam Sdn Bhd. | | | | | | | | | | | | |
| Garden waste | Dispose at Frond staking row | | | | | | | | | | | | |
| Kitchen waste | Disposed at Landfill for each operating unit | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|--|--|------------|
| 4.6.11 | Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance - | <p><u>Mill</u> Annual Medical for water treatment plant , workshop and others is done on 9 August 2018 with total 13 Person which conducted by Dr Muhamad Fauzi Bin Abd Wahab at Klinik Sindora Estate (OHD cert: HQ/13/DOC/00/322 valid until 12 June 2019)</p> <p><u>Sg Papan</u> Medical surveillance is conducted on 15 July 2018 with total 74 person (including sprayer, fertilizer and workshop) which conducted by Dr Muhammad Sayuthi Bin Zakaria (HQ/17/DOC/00/00053) at Falck Bestari</p> <p><u>REM</u> Medical surveillance is conducted on 5 August 2018 with total 63 person (including fogger,sprayer, fertilizer and workshop) which conducted by Dr Muhammad Sayuthi Bin Zakaria (HQ/17/DOC/00/00053) at Falck Bestari</p> | Complied |
| 4.6.12 | No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance - | No women chemical handler in Sg papan estate, Sindora estate and REM estate. Verification by site visit and interview. | Complied |
| <p>Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:</p> | | | |

| | | | |
|--------------|---|---|-----------------|
| <p>4.7.1</p> | <p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. - Major compliance -</p> | <p><u>Mill</u> Safety and Health Policy which has been signed by Managing Director of Kulim Malaysia Berhad dated 1/5/2008. Chemical Health Risk Assessment (CHRA) CHRA was conducted on 26 March 2018 by QMSPRO Training & Consultancy Noor Mahani (JKKP HIE 127/171-2(154) for SPOM. CHRA was conducted on 27 February 2018 by QMSPRO Training & Consultancy (JKKP HIE 127/171-2(154) for Sg Papan Estate. CHRA was conducted in 25/9/2018 by QMSPRO Training & Consultancy (JKKP HIE 127/171-2(154) for Sindora Estate. ii) Chemical Exposure Monitoring The CEM is not been conducted because as per recommendation by CHRA assessor on email dated 12 June 2018, the assessor recommended to hold the chemical exposure monitoring until new CHRA report produce. This new recommendation will change in term to conduct the monitoring and sampling strategy. iii) Medical Surveillance 13 workers were sent on 9/8/2018 for medical surveillance for those who are involved with chemical in SPOM; refer to medical surveillance report by registered OHD, HQ/13/DOC/00/322 under Falck Bestari Healthcare. All the operators were found normal with no occupational related illness have been detected. iv) Audiometric Testing Audiometric testing was conducted on 27/5/2018 by Dr. Mohd Rizal Abdul Aziz (DOSH No: HQ/15/DOC/00/395) Kulim Safety Training & Services Sdn Bhd with PAC testing & Consultancy Sdn Bhd. Under report no HCP/AMT/180508, total workers tested were 45. From the report, 8 workers were found with Hearing Impairment and no one for STS. JKKP 7 was sent to DOSH accordingly on 27/5/18. v) LEV inspection Local Exhaust Ventilation (LEV) Examination was conducted on 15 May 2018 by Lee Kean Heng (JKKP HIE 127/171-3/2(210)) from Amcen Lab Sdn Bhd Report No. HIE 127/171-</p> | <p>Complied</p> |
|--------------|---|---|-----------------|

**RSPO Public Summary Report
Revision 7 (Aug /2018)**

| Criterion / Indicator | Assessment Findings | Compliance |
|-----------------------|--|------------|
| | 3/2(210)-2018/024. From the conclusion of the report LEV is correctly effective in it performance and able to achieve the requirement by ACGIH. The Monthly record is done by Lab Supervisor and available | |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| Criterion / Indicator | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|--------------|---------------|-----|---------|---------|---|-------|--------|---|---------|--------|---|----------|---------|----|---------|---------|---|--------------|---------------|-----|--------|-------------|----|-----------------------------|--------------|---|--------------|---------------|-----|----------|----------|---|-----------------|
| <p>4.7.2</p> <p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.</p> <p>- Major compliance -</p> | <p><u>Sg Papan Estate</u> HIRARC for all activities was assessed which was based on Risk Assessment Criteria stated in the procedure (SOP) Hazard Identification, Risk Assessment and Risk Control, dated 20/11/2009. This HIRARC cover from Harvesting, pruning, spraying, sanitation, rat bait, until transportation FFB to Mill. The latest HIRARC review was conducted on 15/8/2018 by HIRARC team. JKPP 8 (NHAW/JKKP8/2018/004/LSP) dated sent to DOSH is 18 January 2018</p> <table border="1" data-bbox="1028 719 1827 932"> <thead> <tr> <th>Workers name</th> <th>Accident date</th> <th>LTI</th> </tr> </thead> <tbody> <tr> <td>Sanudin</td> <td>10/7/17</td> <td>1</td> </tr> <tr> <td>Rosli</td> <td>6/8/17</td> <td>1</td> </tr> <tr> <td>Jaswadi</td> <td>6/8/17</td> <td>2</td> </tr> <tr> <td>Suhendri</td> <td>11/9/17</td> <td>40</td> </tr> <tr> <td>Jaswadi</td> <td>14/9/17</td> <td>2</td> </tr> </tbody> </table> <p>For year 2018 accident JKPP 6 as per below:-</p> <table border="1" data-bbox="1028 995 1827 1147"> <thead> <tr> <th>Workers name</th> <th>Accident date</th> <th>LTI</th> </tr> </thead> <tbody> <tr> <td>Pilhan</td> <td>20 May 2018</td> <td>11</td> </tr> <tr> <td>Mohd Nordin Bin Abdul Rahim</td> <td>24 June 2018</td> <td>7</td> </tr> </tbody> </table> <p><u>REM Estate</u> HIRARC review on 30 September 2018. JKPP 8 (9 cases) latest sent to DOSH dated 8 Jan 2018 for previous year 2017 accident record. For year 2018 to date JKPP 6 record as per below:-</p> <table border="1" data-bbox="1028 1310 1827 1378"> <thead> <tr> <th>Workers name</th> <th>Accident date</th> <th>LTI</th> </tr> </thead> <tbody> <tr> <td>Darwilis</td> <td>4/1/2018</td> <td>6</td> </tr> </tbody> </table> | Workers name | Accident date | LTI | Sanudin | 10/7/17 | 1 | Rosli | 6/8/17 | 1 | Jaswadi | 6/8/17 | 2 | Suhendri | 11/9/17 | 40 | Jaswadi | 14/9/17 | 2 | Workers name | Accident date | LTI | Pilhan | 20 May 2018 | 11 | Mohd Nordin Bin Abdul Rahim | 24 June 2018 | 7 | Workers name | Accident date | LTI | Darwilis | 4/1/2018 | 6 | <p>Complied</p> |
| Workers name | Accident date | LTI | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sanudin | 10/7/17 | 1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Rosli | 6/8/17 | 1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jaswadi | 6/8/17 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Suhendri | 11/9/17 | 40 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jaswadi | 14/9/17 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Workers name | Accident date | LTI | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pilhan | 20 May 2018 | 11 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mohd Nordin Bin Abdul Rahim | 24 June 2018 | 7 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Workers name | Accident date | LTI | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Darwilis | 4/1/2018 | 6 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | |
|---|--|-------------|------|-------------|-----------|------------|--------|-----------|-------|--------|------|------|-------------|----------|------|--------|-----------|--------------------|--------|-----------------|
| <p>4.7.3</p> <p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.</p> <p>- Minor compliance -</p> | <p>In Mill observed at engine room, oil room, boiler station, spraying activity, manuring activity and harvesting activity, adequate and appropriate protective equipment was provided</p> <p>Latest PPE issuance was provide on 9/8/18 for Safety Shoes, hand gloves and 19/7/18 for safety helmet.The training was conducted accordingly at mill.</p> <p>Training Programme is available for 2018 there are 54 programme have been covered under training programe including OSH meeting, medical surveillence, chemical handling training, IPM training, and etc.</p> <p>PPE issuance for REM estate is available under PPE record as per verification record detail below:-</p> <table border="1" data-bbox="1032 783 1827 916"> <thead> <tr> <th>Date</th> <th>Item</th> <th>Employee id</th> </tr> </thead> <tbody> <tr> <td>20/9/2018</td> <td>Respirator</td> <td>603996</td> </tr> <tr> <td>20/3/2018</td> <td>Apron</td> <td>603849</td> </tr> </tbody> </table> <p>PPE issuance for Sindora estate is available under PPE record as per verification record detail below:-</p> <table border="1" data-bbox="1032 1011 1827 1171"> <thead> <tr> <th>Date</th> <th>Item</th> <th>Employee id</th> </tr> </thead> <tbody> <tr> <td>9/1/2018</td> <td>Mask</td> <td>680549</td> </tr> <tr> <td>10/7/2018</td> <td>Mask,apron & glove</td> <td>622091</td> </tr> </tbody> </table> | Date | Item | Employee id | 20/9/2018 | Respirator | 603996 | 20/3/2018 | Apron | 603849 | Date | Item | Employee id | 9/1/2018 | Mask | 680549 | 10/7/2018 | Mask,apron & glove | 622091 | <p>Complied</p> |
| Date | Item | Employee id | | | | | | | | | | | | | | | | | | |
| 20/9/2018 | Respirator | 603996 | | | | | | | | | | | | | | | | | | |
| 20/3/2018 | Apron | 603849 | | | | | | | | | | | | | | | | | | |
| Date | Item | Employee id | | | | | | | | | | | | | | | | | | |
| 9/1/2018 | Mask | 680549 | | | | | | | | | | | | | | | | | | |
| 10/7/2018 | Mask,apron & glove | 622091 | | | | | | | | | | | | | | | | | | |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| Criterion / Indicator | Assessment Findings | Compliance |
|-----------------------|--|-----------------|
| <p>4.7.4</p> | <p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.</p> <p>- Major compliance -</p> <p>The responsible persons are the Manager, Assistant Manager & SHEO of the respective operating units. JKPP meeting members consist of employer & employee representatives. Records of regular meetings between the responsible person and workers were maintained. There was no major issue. Refer OHS meeting minutes :</p> <ol style="list-style-type: none"> 1. OHS meeting at Sindora POM – 3/2018: dated 27/9/2018, #2:dated 11/7/2018, #1: dated 30/3/2018. All the agenda was discussed accordingly during OHS meeting, eg: accident review, workplace inspection, safety improvement plan, issues from workers, training, complaints has been discussed and action to be taken. 2. OHS meeting at REM Estate – #3: dated 12 Aug 2018, #2:dated 15 May 2018, #1: dated 6 Feb 2018. All the agenda was discussed accordingly during OHS meeting, eg: accident review, workplace inspection, safety improvement plan, issues from workers, training, complaints has been discussed and action to be taken. 3. OHS meeting at Sg Papan Estate – #3: dated 13 Sept 2018, #2:dated 11 July 2018, #1: dated 26 March 2018. All the agenda was discussed accordingly during OHS meeting, eg: accident review, workplace inspection, safety improvement plan, issues from workers, training, complaints has been discussed and action to be taken. 4. OHS meeting at Sindora Estate – #3: dated 14 Sept 2018, #2:dated 27 July 2018, #1: dated 21 March 2018. All the agenda was discussed accordingly during OHS meeting, eg: accident review, workplace inspection, safety improvement plan, issues from workers, training, complaints has been discussed and action to be taken. | <p>Complied</p> |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| Criterion / Indicator | Assessment Findings | Compliance |
|-----------------------|---|-----------------------------|
| <p>4.7.5</p> | <p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. - Minor compliance -</p> <p>The management continued to maintained Emergency Response procedure, dated 23/8/2011 . The procedure was communicated accordingly to all workers. Fire drill been conducted on yearly basis, which the last was conducted on 21/7/2018 . ERP organization chart, assembly area and location of fire extinguishers and contact numbers available and displayed at relevant locations. First aid equipment available at worksites e.g. at Sterilizer station, Boiler Station. First aiders competency certificate available e.g. 911104016945 (Mill Supervisor) expired on 10/8/2018. JKPP 8 report submitted dated 11th January 2018 has not include 7 hearing impairment cases via JKPP 7 dated 2 August 2017 as per requirement of NADOPOD Reg. 10 (1)(b).</p> <p>Thus, a minor NC was issued.</p> <p>First aid box inspection was conducted on monthly basis, sighted the record of inspection was last done on 5/9/2018 (SPOM), 13/9/2018 at Sg Papan Estate, 30/9/2018 (REM E) and 1/10/2018 at Sindora Estate by HA.</p> | <p>Minor nonconformance</p> |

| Criterion / Indicator | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|---------------------|------------------|----------|-------------------|------------------|---------------------|----------------------|------------------|---------------------|---------------------|------------------|--------------------|----------------|------------------|--------------------|-------------------------|------------------|---------------------|-----------------------|-----------------|---------------------|------------------------|-----------------|---------------------|-------------|----------|--------------|------------------|----------|-----------|-------------|----------|--------------|-----------------|
| <p>4.7.6</p> <p>All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -</p> | <p>All workers provided with medical care, and covered by accident insurance. Sample insurance policies and payment for SOCSO checked:</p> <table border="1" data-bbox="1025 491 1825 1082"> <thead> <tr> <th>Workers</th> <th>Ins Guarantee no</th> <th>validity</th> </tr> </thead> <tbody> <tr> <td>Pilhan (B7197805)</td> <td>17DHQEBFE4004470</td> <td>1/11/2017-30/4/2019</td> </tr> <tr> <td>Saparwadi (B1550000)</td> <td>18DHQEBFE4002332</td> <td>1/6/2018-30/11/2019</td> </tr> <tr> <td>Sudirman (B4961031)</td> <td>18DHQEBFE4000277</td> <td>1/1/2018-30/6/2019</td> </tr> <tr> <td>Akrun(B579407)</td> <td>18DHQEBFE4003279</td> <td>1/8/2018-31/1/2020</td> </tr> <tr> <td>Muhamad ramli(B0327098)</td> <td>18DHQEBFE4003941</td> <td>1/10/2018-31/3/2020</td> </tr> <tr> <td>Abdul hamit(B1223152)</td> <td>18DHQEWWCZ04669</td> <td>28/7/2018-27/7/2019</td> </tr> <tr> <td>HASIBULLAH (B12232236)</td> <td>18DHQEWWCZ04669</td> <td>28/7/2018-27/7/2019</td> </tr> </tbody> </table> <p>Socso:-</p> <table border="1" data-bbox="1025 1145 1825 1273"> <tbody> <tr> <td>August 2018</td> <td>X3510347</td> <td>631207015850</td> </tr> <tr> <td>Hairi bin othman</td> <td>12015809</td> <td>801012015</td> </tr> <tr> <td>August 2018</td> <td>W2655032</td> <td>571218016355</td> </tr> </tbody> </table> <p>All the policies were found valid at SPOM, SE, SGPE and REM E.</p> | Workers | Ins Guarantee no | validity | Pilhan (B7197805) | 17DHQEBFE4004470 | 1/11/2017-30/4/2019 | Saparwadi (B1550000) | 18DHQEBFE4002332 | 1/6/2018-30/11/2019 | Sudirman (B4961031) | 18DHQEBFE4000277 | 1/1/2018-30/6/2019 | Akrun(B579407) | 18DHQEBFE4003279 | 1/8/2018-31/1/2020 | Muhamad ramli(B0327098) | 18DHQEBFE4003941 | 1/10/2018-31/3/2020 | Abdul hamit(B1223152) | 18DHQEWWCZ04669 | 28/7/2018-27/7/2019 | HASIBULLAH (B12232236) | 18DHQEWWCZ04669 | 28/7/2018-27/7/2019 | August 2018 | X3510347 | 631207015850 | Hairi bin othman | 12015809 | 801012015 | August 2018 | W2655032 | 571218016355 | <p>Complied</p> |
| Workers | Ins Guarantee no | validity | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pilhan (B7197805) | 17DHQEBFE4004470 | 1/11/2017-30/4/2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Saparwadi (B1550000) | 18DHQEBFE4002332 | 1/6/2018-30/11/2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sudirman (B4961031) | 18DHQEBFE4000277 | 1/1/2018-30/6/2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Akrun(B579407) | 18DHQEBFE4003279 | 1/8/2018-31/1/2020 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Muhamad ramli(B0327098) | 18DHQEBFE4003941 | 1/10/2018-31/3/2020 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Abdul hamit(B1223152) | 18DHQEWWCZ04669 | 28/7/2018-27/7/2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| HASIBULLAH (B12232236) | 18DHQEWWCZ04669 | 28/7/2018-27/7/2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| August 2018 | X3510347 | 631207015850 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Hairi bin othman | 12015809 | 801012015 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| August 2018 | W2655032 | 571218016355 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | |
|---|--|---|------------|-------|----|-----|-------|------|------|------|------|------|------|-----|------|------|------|----------|
| 4.7.7 | Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance - | Records of incident and accident were available, using internal reporting system. Records on Lost Time Accident (LTA) metrics had been verified to be satisfactory. Sample of accident statistic as shown below : <table border="1" data-bbox="1025 523 1832 632"> <thead> <tr> <th>Year</th> <th>SPOM</th> <th>SE</th> <th>SPE</th> <th>REM E</th> </tr> </thead> <tbody> <tr> <td>2017</td> <td>5.97</td> <td>0.82</td> <td>2.03</td> <td>3.54</td> </tr> <tr> <td>2018</td> <td>7.7</td> <td>0.27</td> <td>2.35</td> <td>0.52</td> </tr> </tbody> </table> | Year | SPOM | SE | SPE | REM E | 2017 | 5.97 | 0.82 | 2.03 | 3.54 | 2018 | 7.7 | 0.27 | 2.35 | 0.52 | Complied |
| Year | SPOM | SE | SPE | REM E | | | | | | | | | | | | | | |
| 2017 | 5.97 | 0.82 | 2.03 | 3.54 | | | | | | | | | | | | | | |
| 2018 | 7.7 | 0.27 | 2.35 | 0.52 | | | | | | | | | | | | | | |
| Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained. | | | | | | | | | | | | | | | | | | |
| 4.8.1 | A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. - Major compliance - | A formal training programme on all aspects of RSPO Principles and Criteria has been established and implemented. Training for various categories of operators, including all field and office staff, with regards to individual duties and training needs had been reviewed and found to be complied. Training programme planned for year 2018 was consistently implemented. The programme includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices provided to: - workers exposed to machinery and high noise levels, - workers working in confined space, - harvesters - pesticides operators - manurers | Complied | | | | | | | | | | | | | | | |

**RSPO Public Summary Report
Revision 7 (Aug /2018)**

| <p>4.8.2</p> | <p>Records of training for each employee shall be maintained. - Minor compliance -</p> | <p>Training records for employees available and maintained at the office. Records are verified on a sampling basis which covers all aspect of training and RSPO P&C requirement. Samples of training record for 2017 as follows: Mill</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Training</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>23/9/2018</td> <td>RSPO Awareness</td> <td rowspan="8">Internal training</td> </tr> <tr> <td>27/5/2018</td> <td>Biogas Course</td> </tr> <tr> <td>6/9/2018</td> <td>Chemical Handling Training</td> </tr> <tr> <td>24/7/2018</td> <td>LOTO</td> </tr> <tr> <td>19/3/2018</td> <td>BOD Training</td> </tr> <tr> <td>2/3/2018</td> <td>S/W Mgt</td> </tr> <tr> <td>17/9/2018</td> <td>PCD Training</td> </tr> <tr> <td colspan="3">Sg Papan</td> </tr> <tr> <td>26/9/2018</td> <td>Refresher training for sprayer</td> <td rowspan="7">Internal training</td> </tr> <tr> <td>16/1/2018</td> <td>Fogging Training</td> </tr> <tr> <td>20/8/2018</td> <td>ERP training</td> </tr> <tr> <td>17/4/2018</td> <td>First aider training</td> </tr> <tr> <td>3/9/2018</td> <td>Water sampling training</td> </tr> <tr> <td>19/7/2018</td> <td>Recycle training and campaign</td> </tr> <tr> <td>28/3/2018</td> <td>Rat bait training</td> </tr> <tr> <td colspan="3">REM Estate</td> </tr> <tr> <td>4/1/2018</td> <td>Harversting training</td> <td rowspan="7">Internal training</td> </tr> <tr> <td>21/7/2018</td> <td>Fire Fighting and Drill</td> </tr> <tr> <td>15/2/2018</td> <td>Working at height Training</td> </tr> <tr> <td>5/3/2018</td> <td>chemical handling training</td> </tr> <tr> <td>8/6/2018</td> <td>PPE Inspection</td> </tr> <tr> <td>9/7/2018</td> <td>Scheduled waste Training</td> </tr> <tr> <td>2/8/2018</td> <td>IPM training</td> </tr> </tbody> </table> | Date | Training | Remark | 23/9/2018 | RSPO Awareness | Internal training | 27/5/2018 | Biogas Course | 6/9/2018 | Chemical Handling Training | 24/7/2018 | LOTO | 19/3/2018 | BOD Training | 2/3/2018 | S/W Mgt | 17/9/2018 | PCD Training | Sg Papan | | | 26/9/2018 | Refresher training for sprayer | Internal training | 16/1/2018 | Fogging Training | 20/8/2018 | ERP training | 17/4/2018 | First aider training | 3/9/2018 | Water sampling training | 19/7/2018 | Recycle training and campaign | 28/3/2018 | Rat bait training | REM Estate | | | 4/1/2018 | Harversting training | Internal training | 21/7/2018 | Fire Fighting and Drill | 15/2/2018 | Working at height Training | 5/3/2018 | chemical handling training | 8/6/2018 | PPE Inspection | 9/7/2018 | Scheduled waste Training | 2/8/2018 | IPM training | <p>Complied</p> |
|-------------------|--|--|------|----------|--------|-----------|----------------|-------------------|-----------|---------------|----------|----------------------------|-----------|------|-----------|--------------|----------|---------|-----------|--------------|-----------------|--|--|-----------|--------------------------------|-------------------|-----------|------------------|-----------|--------------|-----------|----------------------|----------|-------------------------|-----------|-------------------------------|-----------|-------------------|-------------------|--|--|----------|----------------------|-------------------|-----------|-------------------------|-----------|----------------------------|----------|----------------------------|----------|----------------|----------|--------------------------|----------|--------------|-----------------|
| Date | Training | Remark | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 23/9/2018 | RSPO Awareness | Internal training | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 27/5/2018 | Biogas Course | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6/9/2018 | Chemical Handling Training | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 24/7/2018 | LOTO | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 19/3/2018 | BOD Training | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2/3/2018 | S/W Mgt | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 17/9/2018 | PCD Training | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sg Papan | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26/9/2018 | Refresher training for sprayer | Internal training | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 16/1/2018 | Fogging Training | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 20/8/2018 | ERP training | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 17/4/2018 | First aider training | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3/9/2018 | Water sampling training | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 19/7/2018 | Recycle training and campaign | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 28/3/2018 | Rat bait training | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| REM Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4/1/2018 | Harversting training | Internal training | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 21/7/2018 | Fire Fighting and Drill | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 15/2/2018 | Working at height Training | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5/3/2018 | chemical handling training | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8/6/2018 | PPE Inspection | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 9/7/2018 | Scheduled waste Training | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2/8/2018 | IPM training | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | | Compliance |
|---|---|--|--|-------------------|
| | | Sindora Estate | | |
| | | 1/6/2018 | Replanting training | Internal training |
| | | 17/5/2018 | SW training | |
| | | 24/9/2018 | First Aid training | |
| | | 20/2/2018 | PPE, and spraying calibration training | |
| | | 13/8/2018 | Chemical handling training. | |
| | | 20/4/2018 | Buffer zone training | |
| Principle 5: Environmental responsibility and conservation of natural resources and biodiversity | | | | |
| Criterion 5.1: Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement. | | | | |
| 5.1.1 | An environmental impact assessment (EIA) shall be documented. - Major compliance - | Sindora POM, Documented Environmental Aspects and Impacts Register (Form No.: EPA-SINPOM-2018; Activity code: ER001-ER021; Rev. 7/2018) available. Total 21 list of activities are identified in POM. As for the review process, the annual review of the EIA management review meeting and review if any new activities in POM, changes of legislation and environmental issue raise by stakeholders. | | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | |
|-----------------------|--|--|----------------------|--------------------|----------|---|---------|--|----------|
| 5.1.2 | Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. - Minor compliance - | <p><u>Mill</u> Environmental Management Plan (EMP) established is based on ISO 14001:2004 objectives and target. Environmental management programme for 2018, dated 12/1/18 was verified. Objective 1: Saving of Natural Resource – Diesel Target; To control diesel consumption from 0.60 liter/mt FFB process.</p> <ul style="list-style-type: none"> i) Action plan to running turbine for non-processing hours use excess fibre ii) Action plan to maintain FFB processed as budgeted to reduce genset usage by adding more FFB supplier iii) Maximum running gas turbine. <p>From the record diesel usage (Mill trends File R 11) for year 2018 to date diesel usage is 0.53 Liter/MT FFB. The usage of diesel and turbine using is been monitored by management.</p> <p><u>REM Estate</u> Aspect impact for REM estate is available, latest review id on 16 August 2018, the activity covered from operation such as harvesting, mulching, sanitation until transportation FFB to Mill. Environmental Management Plan Is available dated Feb 2018 as per below detail:-</p> <table border="1"> <thead> <tr> <th>Pollution Identified</th> <th>Action to be taken</th> </tr> </thead> <tbody> <tr> <td>Emission</td> <td>Emission dark smoke from car – maintenance of tractor and car Emission of noise Air pollution – no open burning</td> </tr> <tr> <td>Erosion</td> <td>Upkeep road and drain Land erosion - Plant guatelama grass at slope Erosion by water at Buffer zone - Sand bagging</td> </tr> </tbody> </table> | Pollution Identified | Action to be taken | Emission | Emission dark smoke from car – maintenance of tractor and car Emission of noise Air pollution – no open burning | Erosion | Upkeep road and drain Land erosion - Plant guatelama grass at slope Erosion by water at Buffer zone - Sand bagging | Complied |
| Pollution Identified | Action to be taken | | | | | | | | |
| Emission | Emission dark smoke from car – maintenance of tractor and car Emission of noise Air pollution – no open burning | | | | | | | | |
| Erosion | Upkeep road and drain Land erosion - Plant guatelama grass at slope Erosion by water at Buffer zone - Sand bagging | | | | | | | | |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| Criterion / Indicator | Assessment Findings | Compliance |
|---|---|-----------------|
| <p>5.1.3</p> | <p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p> <p>- Minor compliance -</p> <p>Reporting for POME results and in line with mil’s compliance schedule requirements. New Guided SelfRegulation was introduced by DOE to ensure all operator self-assessed the compliance status on environmental related issues. The approach is based on 7 Environmental Monitoring Tools (EMT) and implemented since June 2016. New establishment of EPMC @ Environmental Performance Monitoring Committee (operation level – mill) and ERCMC @ Environmental Regulatory Compliance Monitoring Committee (HQ level) shows the commitment towards continuous compliance.</p> <p>Latest ERCMC meeting – 19 April 2018 attended by mill manager and HQ representative.</p> <p>EPMC meeting – 01/2018 5 Feb 2018, and 02/2018 20 Sept 2018. The frequency is twice per year.</p> | <p>Complied</p> |
| <p>Criterion 5.2: The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and and operations managed to best ensure that they are maintained and/or enhanced.</p> | | |

| | | | |
|--------------|--|--|-----------------|
| <p>5.2.1</p> | <p>Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). - Major compliance -</p> | <p>Information in High Conservation Value (HCV) assessment includes both the planted area itself and relevant wider landscape-level with considerations of surrounding areas.</p> <p>Initial HCV assessment conducted in 2007 by external consultant is reviewed annually to ensure management and monitoring plans are relevant and conducted.</p> <p>In April 2016, another HCV Assessment was conducted by Malaysia Environmental Consultant Sdn Bhd. Both lead assessor were ALS licensed assessor (ALS14023KL; ALS15035TN). Within the Sindora estate, following HCV were identified:</p> <ul style="list-style-type: none"> i) Biodiversity HCV 1 and HCV 2. The main concern is elephant using the forest inside and outside the estate. ii) Biodiversity HCV 1. Wildlife corridotr along Sg Sembrong iii) Biodiversity HCV 3. Monitor species presence and maintain buffer with natural forest iv) Stream management HCV 4. Natural bank vegetation should be allowed to regenerate v) Soil and nutrient conservation on hill slopes. HCV4 <p>The estate’s boundary shares with the Kluang Forest Reserve, and the overlapping Gunung Belumut Wildlife Reserve. It also supports a viable subpopulation of the elephant. Within the Sindora estate, there is a forest reserve which is belong to BAKAJ (Water Regulatory Bodies Johore) connect between this foraging area and the rest of the Kluang Forest Reserve. It also serve as the wildlife corridor from east to west within the estate.</p> | <p>Complied</p> |
|--------------|--|--|-----------------|

**RSP0 Public Summary Report
Revision 7 (Aug /2018)**

| Criterion / Indicator | Assessment Findings | Compliance |
|-----------------------|--|------------|
| | <p>For Sg Papan Estate, a baseline HCV report title Rapid Biodiversity Assessment dated July 10, 2008 was verified. Based on the report, total 51.37 ha of HCV identified with within estate area.</p> | |

| <p>5.2.2</p> | <p>Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan. - Major compliance -</p> | <p>Based on the April 2016 HCV Assessment Report of Sindora Estate, total 77 species were recorded, two (2) are listed as critical (CR), three (3) endangered species (EN), two (2) vulnerable (VU) species, four (4) near threatened (NT) species. The remaining 66 species are classed as Least Concerned (LC).</p> <p>The management plan was developed based on recommendation of HCV assessment report. Action plan such as expand the narrowest section along the wildlife corridor. Total 2 narrowest section in blocks P87/01- 42 m and blocks P87/03- <40M has been expanded to total 160m and 200m respectively. During onsite visit, electric fences already removed from the connecting road to allow unhindered passage for elephants moving east-west along the river corridor.</p> <p>For REM estate, Rapid Biodiversity Assessment Fact Sheet dated 5th September is referred to. Mammal (Long Tailed Macaque) under schedule II was identified. Other birds such as (common kingfisher, black-winged kite, crested serpent eagle were among protected birds under schedule III.</p> <p>HCV management plan developed for Sg Papan, REM and Sindora Estate which include:</p> <table border="1" data-bbox="1028 1137 1830 1380"> <thead> <tr> <th>HCV plan</th> <th>Progress</th> <th>Person In Charge</th> </tr> </thead> <tbody> <tr> <td>Boundary survey</td> <td>Land survey done by qualified surveyor.</td> <td>Property development</td> </tr> <tr> <td>Bird survey</td> <td>WCS bird survey, completed on 30/11/15</td> <td>Sustainability and estate team</td> </tr> </tbody> </table> | HCV plan | Progress | Person In Charge | Boundary survey | Land survey done by qualified surveyor. | Property development | Bird survey | WCS bird survey, completed on 30/11/15 | Sustainability and estate team | <p>Complied</p> |
|-----------------|---|--|----------|----------|------------------|-----------------|---|----------------------|-------------|--|--------------------------------|-----------------|
| HCV plan | Progress | Person In Charge | | | | | | | | | | |
| Boundary survey | Land survey done by qualified surveyor. | Property development | | | | | | | | | | |
| Bird survey | WCS bird survey, completed on 30/11/15 | Sustainability and estate team | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | | | Compliance |
|-----------------------|--|---|--|--------------------------------|------------|
| | | Encroachment control | Regular patrolling | Sustainability and estate team | |
| | | Erosion control | Road maintenance, guatamala and vertivar planting | Sustainability and estate team | |
| | | Restore natural vegetation | LCC, guatamala and vertivar planting | Sustainability and estate team | |
| | | Buffer zone establishment (Sg Berangan) | Mapped out area Buffer zone peg Twice a year maintenance programme | Sustainability and estate team | |
| | | Elephant monitoring | To record movement in the field, BAKAJ catchment and estate boundary | Sustainability and estate team | |

| Criterion / Indicator | Assessment Findings | Compliance | | | | | | | | |
|---|--|------------|------------------|----------------------------------|--------|----------|------------------|-----------------------|---------|----------|
| 5.2.3 There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. - Minor compliance - | Regular awareness programme about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. Verified internal training carried out at Sindora Estate: <table border="1" data-bbox="1028 588 1832 730"> <tr> <td>Training</td> <td>Date of Training</td> </tr> <tr> <td>HCV briefing for flora and fauna</td> <td>2/4/18</td> </tr> </table> <u>Sungai Papan Estate</u> <table border="1" data-bbox="1028 828 1832 933"> <tr> <td>Training</td> <td>Date of Training</td> </tr> <tr> <td>RTE and HCV awareness</td> <td>10/5/18</td> </tr> </table> | Training | Date of Training | HCV briefing for flora and fauna | 2/4/18 | Training | Date of Training | RTE and HCV awareness | 10/5/18 | Complied |
| Training | Date of Training | | | | | | | | | |
| HCV briefing for flora and fauna | 2/4/18 | | | | | | | | | |
| Training | Date of Training | | | | | | | | | |
| RTE and HCV awareness | 10/5/18 | | | | | | | | | |

| Criterion / Indicator | Assessment Findings | Compliance | | | | | | |
|--|---|--------------------|-----------------------------|---------|--|---------|-----------------------------------|----------|
| 5.2.4 Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance - | <p>Management plan is incorporated with ongoing monitoring of the status of HCV and RTE species that are affected by plantation or mill operations and reported by the Kulim SPO Team from Head Office.</p> <p>Outcomes of monitoring are communicated with plantation management and with management plan. HCV monitoring of monthly record by SPO Department available and animal such as porcupine, snake and monkey was still sighted. For example, sightings record verified at REM Estate dated 27/8/18. From the records, no sightings of RTE recorded.</p> <p><u>Sindora Estate</u></p> <p>Sample of latest sighting of animal and patrolling records as per below:</p> <table border="1" data-bbox="1025 895 1825 1347"> <thead> <tr> <th data-bbox="1025 895 1339 946">Date of monitoring</th> <th data-bbox="1339 895 1825 946">Visited area (hotspots/HCV)</th> </tr> </thead> <tbody> <tr> <td data-bbox="1025 946 1339 1254">25/9/18</td> <td data-bbox="1339 946 1825 1254"> Water catchment area (P10/6) Wildlife corridor (Elephant) P15A/P88/6 "Bukit Batu" (P10/2) Forest Reserve/ "Gunung Berlumut" R93 Forest reserve boundary (P17A/1) </td> </tr> <tr> <td data-bbox="1025 1254 1339 1347">21/9/18</td> <td data-bbox="1339 1254 1825 1347"> P06 (Wild boar) P15A (Monkey) </td> </tr> </tbody> </table> | Date of monitoring | Visited area (hotspots/HCV) | 25/9/18 | Water catchment area (P10/6) Wildlife corridor (Elephant) P15A/P88/6 "Bukit Batu" (P10/2) Forest Reserve/ "Gunung Berlumut" R93 Forest reserve boundary (P17A/1) | 21/9/18 | P06 (Wild boar) P15A (Monkey) | Complied |
| Date of monitoring | Visited area (hotspots/HCV) | | | | | | | |
| 25/9/18 | Water catchment area (P10/6) Wildlife corridor (Elephant) P15A/P88/6 "Bukit Batu" (P10/2) Forest Reserve/ "Gunung Berlumut" R93 Forest reserve boundary (P17A/1) | | | | | | | |
| 21/9/18 | P06 (Wild boar) P15A (Monkey) | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|---|------------|
| 5.2.5 | Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance - | There was no HCV set-aside that needs any negotiation process with the local communities. | Complied |
| Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner. | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|---|---|------------|
| 5.3.1 | All waste products and sources of pollution shall be identified and documented. - Major compliance - | <p>The documentation and identification of all the waste products based on waste type and source which review on 1 August 2018.</p> <p>Waste types such as domestic, schedule waste, rubber material, scrap, mill by products, emissions, liquid waste, office and medical waste. Records on the usage and disposal were recorded. Appropriate secondary containment for the diesel skid tanks, chemical and scheduled waste storage areas was verified to be maintained.</p> <p>Scheduled Waste identified included spent hydraulic oil (SW 305), spent lubricant oil (SW 306), used chemical containers/drums (SW 409), used filters SW 410), Hydrocarbon/ chemical spillage (SW 408), Mixture of scheduled and non-scheduled waste(SW 407), Expired chemical(SW 429), waste water PCD (SW 307) and used batteries (SW 102). Records on the usage and disposal were well recorded and documented. Appropriate secondary containment for the diesel skid tanks, chemical and scheduled waste storage areas was verified to be maintained.</p> <p>Notification of scheduled waste, refer notification number, 23872 with was submitted on 12/2/14. No changes of waste generation reported. Type of scheduled waste generated as follows: SW 409, SW410, SW305 and SW102.</p> <p>Latest inventory of waste: for September 2018. Date of 5th schedule submission is on 29/9/18.</p> | Complied |

| | | | |
|--------------|---|--|-----------------|
| <p>5.3.2</p> | <p>All chemicals and their containers shall be disposed of responsibly. - Major compliance -</p> | <p>Stores for scheduled waste were inspected at audited sites i.e. Mill and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment. e.g. for POM by Kualiti Alam Sdn Bhd and following disposal records were verified.</p> <p>a. Consignment note 2018082610A14233 dated 26 August 2018; SW305</p> <p>The disposal is at Kualiti Alam Sdn Bhd (License no. 004993) valid cert until 30 April 2019.</p> <p><u>Sg Papan Estate</u> Disposal record is based on ESWiS consignment. Disposal is at Kualiti Alam Sdn Bhd Consignment number SW408, consignment 20180418088PFQ72 dated 18/4/2018 SW410, consignment 2018041808EXHAL4 dated 18/4/2018 SW305, consignment 201804180894N2KE dated 18/4/2018</p> <p><u>REM Estate</u> Disposal record is based on ESWiS consignment. Disposal is at Kualiti Alam Sdn Bhd SW307, Consignment 012919 dated 30/9/2018 SW305, Consignment 0129199 dated 30/9/2018</p> <p><u>Sindora Estate</u> Disposal record is based on ESWiS consignment. Disposal is at Kualiti Alam Sdn Bhd SW307, Consignment 0008139 dated 23/8/2018 SW305, Consignment 0008140 dated 23/8/2018 SW110, Consignment 0129110 dated 23/8/2018 SW409, Consignment 0129108 dated 23/8/2018 SW410, Consignment 0129109 dated 23/8/2018</p> | <p>Complied</p> |
|--------------|---|--|-----------------|

| Criterion / Indicator | Assessment Findings | Compliance |
|--|--|-----------------|
| <p>5.3.3</p> <p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -</p> | <p><u>Sindora estate</u> Clinical waste disposed through license contractor. Latest disposal was done on 22/7/2018 (6.2kg) and collected by Kualiti Alam Sdn Bhd. Refer to consignment note# 0227914 (2018082717G5KQCU). Quantity generated and disposal records were maintained.</p> <p><u>Sg Papan Estate</u> Domestic waste disposal at field 03/01 Sg Papan Estate. Waste collection at line site carried out 3 times per week. Clinical waste disposed through license contractor. Latest disposal was done on 25/7/2018 and collected by Kualiti Alam Sdn Bhd. Refer to consignment note 202807251613JYVF. Quantity generated and disposal records were maintained</p> <p><u>REM Estate</u> Clinical waste disposed through license contractor. Latest disposal was done on 25/7/2018 and 2.8kg collected by Kualiti Alam Sdn Bhd. Refer to consignment note 202807251613JYVF. Quantity generated and disposal records were maintained</p> | <p>Complied</p> |
| <p>Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.</p> | | |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | |
|---|--|---|------------|----|--------|------|--------------|---------------|--------------|-------------|---------------|----------|
| 5.4.1 | A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance - | <p>Plan for improving efficiency of the use of fossil fuels (diesel) and to optimise renewable energy (RE) is in place and monitored. Summary of renewable energy and fossil fuel usage recorded as below:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>RE</th> <th>Diesel</th> </tr> </thead> <tbody> <tr> <td>2017</td> <td>17.64 kWh/mt</td> <td>0.48 litre/mt</td> </tr> <tr> <td>2018 to date</td> <td>3.85 kWh/mt</td> <td>0.53 litre/mt</td> </tr> </tbody> </table> <p>Moving forward alternative source for fossil fuel will be replaced by biogas (CH₄). Starting from January 2018 to August 2018, total of 321,030 kW was generated and return back for own consumption. The use of fossil fuel will gradually reduced from time to time.</p> | Year | RE | Diesel | 2017 | 17.64 kWh/mt | 0.48 litre/mt | 2018 to date | 3.85 kWh/mt | 0.53 litre/mt | Complied |
| Year | RE | Diesel | | | | | | | | | | |
| 2017 | 17.64 kWh/mt | 0.48 litre/mt | | | | | | | | | | |
| 2018 to date | 3.85 kWh/mt | 0.53 litre/mt | | | | | | | | | | |
| <p>Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.</p> | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|--|------------|
| 5.5.1 | <p>There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.</p> <p>- Major compliance -</p> | <p>There is no land preparation by burning at Sindora Management Unit. Sustainability handbook was described on Environmental policy including Zero open burning policy dated January 2008. Management complying with the Malaysian environmental law –EQA and Regulations 1974.</p> <p><u>REM Estate</u> Replanting field P17 (337.64 ha) was carried out by 3rd party contractor, Special Appearance Sdn Bhd (commence date : 15/6/17, completed date: 31/12/17). Based on letter of acceptance, KMB/C1/4/4(2017) dated 30/5/17; scheduled of work has detailed out scope of work for replanting [felling/shredding/chipping/deboling etc]</p> <p><u>Sindora Estate</u> Replanting field P18 (385.69 ha) was carried out by 3rd party contractor, Special Appearance Sdn Bhd (commence date : 1/6/18, completed date: 31/12/18). Refer to Bill of Quantity (BOQ) scheduled of work has detailed out scope of work for replanting [felling/shredding/chipping/deboling etc]</p> | Complied |
| 5.5.2 | <p>Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.</p> <p>- Minor compliance -</p> | <p>There is no land preparation by burning at REM and Sindora Estate. Site visit at replanting plot P17 and P18, no evidence of fire has been used for land preparation.</p> | Complied |
| <p>Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</p> | | | |

| Criterion / Indicator | Assessment Findings | Compliance | | | | |
|---|---|-----------------|--------|--|-------|-----------------|
| <p>5.6.1</p> <p>An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -</p> | <p>For Sindora Mill, Ambient Air quality monitoring and Air emission monitoring has been carried out as per required frequency stipulated in mill's compliance schedule. In addition, smoke density meters were calibrated consistently every 6 monthly. Results of monitoring as follows:</p> <p>i) Stack monitoring, twice per year Stack# 3: 7 June 2018, refer to report,</p> <table border="1" data-bbox="1032 651 1659 751"> <thead> <tr> <th>Parameter</th> <th>Result</th> </tr> </thead> <tbody> <tr> <td>Dust concentration (mg/Nm³)</td> <td>0.026</td> </tr> </tbody> </table> <p>ii) Smoke density meter calibration, twice per year (6 monthly) 1st half: refer to calibration certificate no; Betronics-coc-2018-180810-01k by Betronics(M) Sdn Bhd. Calibration date: 10/8/2018 iii) Ambient Air (quarterly) Total Suspended Particulate, TSP (limit 24hr: 260 ug/m³ as per Malaysian Recommended Air Quality Quidelines). 1 monitoring points were selected. 10 April 2018: A1-112, A2-32 (refer to report# ETD/S/2018-04/3749 Noise boundary (6 monthly frequency) done by internal team (engineering department) Q1 (28/3/2018): 5 boundary points selected for monitoring. All monitored point in within the allowable limit of 65 dBA (day) and 55 dBA (night)</p> | Parameter | Result | Dust concentration (mg/Nm ³) | 0.026 | <p>Complied</p> |
| Parameter | Result | | | | | |
| Dust concentration (mg/Nm ³) | 0.026 | | | | | |
| <p>5.6.2</p> <p>Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance</p> | <p>Main source of significant pollutants and greenhouse gas (GHG) identified was methane (CH₄) emission through POME treatment. Other less significant GHG emissions identified including CO_x, SO_x and NO_x from various sources including fossil fuel, chemical and fertilizer consumptions.</p> | <p>Complied</p> | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|---|------------|
| 5.6.3 | A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance - | Monitoring of the GHG quantity was done through RSPO approved calculator Palm GHG. Annual quantification of all GHG sources was input into the calculator. These calculations were done in HQ level where GHG calculations were done as per certification unit basics. Latest GHG report covered from January 2017 until December 2017. | Complied |
| Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers. | | | |
| Criterion 6.1: Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement. | | | |

| | | | |
|--------------|--|--|-----------------|
| <p>6.1.1</p> | <p>A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -</p> | <p>Social Impact Assessment (SIA) Sindora Estate Kluang Johor by Malaysian Environmental Consultants Sdn. Bhd.; Date: 25-27 April 2016. Assessment Team: Kishokumar Jeyaraj, Maradu Panjaitan, Siti Nor Azlina Mohd. Nordin, Yuliantini, Novia Sylviant, Norleen Lowrans</p> <p><u>Mill</u></p> <ul style="list-style-type: none"> - Established as Daftar Impak Sosial Kulim (Malaysia) Berhad 2018; Dated: 29/4/2018 based on the Procedure of SPO Social Impact Assessment Documentation; dated 3/9/2007. Impact identified and analyzed through matrix of Risk (Frequency x Consequences) and Significant (Likelihood x Risk) and listed as Social Impact Register for KMB and JCorp (SR001 – SR075). - Latest external stakeholder meeting was done on 26/9/2018 at Sindora Mill. Meeting attended by external stakeholder including local authority & community, vendors. Internal stakeholder meeting conducted on 10/9/2018 with workers’ representative and canteen operator. - Sg. Papan Estate: Latest Daftar Impact Social Kulim (Malaysia) Berhad 2018; Dated: 15/9/2018; Serial # SIA01 – SIA07 and Cadangan Penambahbaikan Sosial Bagi Ladang Selai 2018; Dated: 15/9/2018; Serial # LSP01 – LSP05. Latest stakeholder meeting was conducted on 23/8/2018 - REM Estate: Latest external stakeholder meeting was done on 27/8/2018 at Dewan SJKT Ladang REM. Meeting attended by external stakeholder including local authority & community, vendors. Previous meeting was conducted on 2/4/2018. Internal stakeholder meeting conducted on 28/8/2018 with workers’ Union, Women and Foreign representatives, vendors and grocery shop & canteen operator. - Sindora Estate: Surat Perlantikan Sebagai Pegawai Sosial; Penolong Pengurus Kanan; Dated: 1/1/2018; Stakeholder meeting conducted on 25/9/2018 | <p>Complied</p> |
|--------------|--|--|-----------------|

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|---|----------------|
| 6.1.2 | There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance - | Evidence that the assessment has been done with the participation of affected parties sighted available as per records of stakeholder meetings and others such as Sungai Papan Estate Social Audit Records 2018. | Complied |
| 6.1.3 | Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance - | Action plan established with respective person in-charge to avoid/mitigate negative impacts and promotion of positive impacts as Kulim Social Improvement Plan consists of Health and Sanitation, Handling of Chemical, Housing and Amenities, Entitle, Community as well as sampled: - <i>Cadangan Penambahbaikan Sosial bagi Kilang Sawit Sindora 2018; 29/4/2018</i> - <i>Daftar Impak Sosial Mengikut Unit Operasi 2018; Serial # SIA01 – SIA07; Date: 15/9/2018</i> <i>Cadangan Penambahbaikan Sosial bagi Ladang REM 2018; Serial # LREM01 – LREM06; Date: 22/4/2018</i> | Complied |
| 6.1.4 | The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance - | The plan was reviewed on yearly basis and the last reviewed was conducted on 15/9/2018 for all estates. It includes all the related issues for both internal and external stakeholder’s issues. | Complied |
| 6.1.5 | Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance - | No scheme smallholder involved in the Sindora POM certification unit. | Not applicable |
| Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties. | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|--|------------|
| 6.2.1 | <p>Consultation and communication procedures shall be documented.</p> <p>- Major compliance -</p> | <p>Kulim (M) Berhad has implemented the SPO Consultation and Transparency Plans dated 4/9/2007 and a Communication and Consultation Management Guidelines (Communication Procedure V2.0) generated by SPO team on Nov 09. The aim of this plan is to ensure an open and transparent communication methods with local communities and other stakeholders. The guideline is specific to communicate and consult with respect to social and environment aspects and impacts, performance and OSH issues. Communication recorded in forms through <i>Borang Aduan/Cadangan</i> that was kept in office with retention time of 3 years.</p> | Complied |
| 6.2.2 | <p>A management official responsible for these issues shall be nominated.</p> <p>- Minor compliance -</p> | <p>As per letter ref. # SQD/SOC/024/16; Dated: 23/10/2016; Appointment as Social Person In-Charge to All RC Executive. Letter ref. # (14) RMC/COM/GM/18/09; Dated: 27/6/2018; Appointment of Siang Complex RC Executive as Person Responsible for Compliance. Representatives in individual operating units are either Assistant Mill Managers or Office Clerks.</p> | Complied |
| 6.2.3 | <p>A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained.</p> <p>- Minor compliance -</p> | <p>List of stakeholders available at each operating unit divided into few categories of following:</p> <ul style="list-style-type: none"> - List of Government Departments/Agencies - List of Contractors - List of Suppliers <p>Communications, copied form complaints/grievances form were recorded in Enquiry Register book.</p> | Complied |
| <p>Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.</p> | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|--|------------|
| 6.3.1 | The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance - | System established based on documented SPO Grievance Procedure Program; Dated: 4/9/2018 as Kulim Grievance Procedure Plans and Grievance Policy (<i>Polisi Kilanan</i> dated 1/5/2018). | Complied |
| 6.3.2 | Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance - | The Enquiry Register and Housing Complaint Logbook were being used to record any request, complaints and grievances from the stakeholders. There was no any complaints recorded since last audit except for housing damages which were resolved within timeframe | Complied |
| Criterion 6.4: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. | | | |
| 6.4.1 | A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance - | Procedure in place was SPO Negotiations Concerning Compensation Program; Dated: 4/9/2007. The procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly also referring to Workmen’s Compensation Act 1952. | Complied |
| 6.4.2 | A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups’ proof of legal versus communal ownership of land. - Minor compliance - | Kulim (M) Berhad has established SOP to identify legal and customary rights as well as people entitled to compensation as per procedure in place i.e. SPO Negotiations Concerning Compensation Program; Dated: 4/9/2007. The procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|--|---|------------|
| 6.4.3 | The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance - | No any dispute issues that required any compensation occurred since the last audit. | Complied |
| Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages. | | | |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| | | | |
|--------------|--|--|-----------------|
| <p>6.5.1</p> | <p>Documentation of pay and conditions shall be available. - Major compliance -</p> | <p>Documentations of pay and conditions made available at all sampled operating units based on SPO Pay and Conditions Program; Kulim Pay and Conditions Plan; Dated: 4/9/2007 as per following:</p> <p><u>Mill:</u></p> <ul style="list-style-type: none"> - Employee # 623131; Work station: Boiler; Date joined: 1/7/2015; Nationality: Malaysia - Employee # 623201; Work station: Kernel; Date joined: 15/7/2018; Nationality: Indonesia - Employee # 623019; Work station: Press; Date joined: 14/11/2005; Nationality: Malaysia - Employee # 623191; Work station: Date joined: 17/11/2017; Nationality: Indonesia <p><u>Sg. Papan Estate:</u></p> <ul style="list-style-type: none"> - Employee # 626160; Work station: General; Date joined: 12/8/2018; Nationality: Indonesia - Employee # 626161; Work station: General; Date joined: 12/8/2018; Nationality: Indonesia - Employee # 626159; Work station: General; Date joined: 12/8/2018; Nationality: Indonesia - Employee # 626162; Work station: General; Date joined: 23/8/2018; Nationality: Indonesia <p><u>REM Estate:</u></p> <ul style="list-style-type: none"> - Employee # 603913; Work station: General; Date joined: 10/5/2017; Nationality: Bangladesh - Employee # 603931; Work station: General; Date joined: 16/8/2017; Nationality: Malaysia - Employee # 603924; Work station: General; Date joined: 12/2/2013; Nationality: Indonesia | <p>Complied</p> |
|--------------|--|--|-----------------|

RSPO Public Summary Report
Revision 7 (Aug /2018)

| Criterion / Indicator | Assessment Findings | Compliance |
|-----------------------|--|------------|
| | <ul style="list-style-type: none"> - Employee # 603847; Work station: General; Date joined: 1/4/2016; Nationality: Malaysia - Employee # 603955; Work station: General; Date joined: 15/1/2018; Nationality: Indonesia - Employee # 603953; Work station: General; Date joined: 15/4/2013; Nationality: India <p><u>Sindora Estate:</u></p> <ul style="list-style-type: none"> - Employee # 622029; Work station: Driver; Date joined: 5/6/1997; Nationality: Malaysia - Employee # 680503; Work station: General; Date joined: 20/7/2018; Nationality: Bangladesh - Employee # 622003; Work station: General; Date joined: 6/2/1995; Nationality: Malaysia - Employee # 680477; Work station: Harvester; Date joined: 7/1/2018; Nationality: Indonesia | |

| | | | |
|--------------|--|--|-----------------|
| <p>6.5.2</p> | <p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. - Major compliance -</p> | <p><u>Mill:</u> Sighted for a sample women worker (Employee # 000951854; Workstation: Weighbridge operator) work attendance (punch-card) records for the month of Aug 2018 shown the women worker work exceeded 10pm at night on 5th, 6th 20th and 21st. Punch-card records for month of Sep 2018 shown the same women worker work exceeded 10pm at night on 2nd, 3rd, 11th, 21st and 30th. This issue was highlighted as Major Nonconformity under indicator 2.1.1 since this is related to legal requirements. Sighted an Industrial Court Case No. 11/2-13/18 Between MAPA and AMESU; MAPA/AMESU Agreement, 2018; Effective date: 1/1/2018 for 3 years. This agreement has been followed as terms in all workers work agreements in estates. Sighted also the sampled of contract agreements that signed by the contractors' workers as below:</p> <p>Contract workers for Sg. Papan: Sungai Rezeki Sdn. Bhd.</p> <ul style="list-style-type: none"> - Surat Tawaran Kerja Pekerja Tempatan/Asing ID # AT945127; Period: 25/1/2017 – 24/1/2019; Jawatan: Harvester; Piece rate: RM30/mt FFB - Surat Tawaran Kerja Pekerja Tempatan/Asing ID # AT976995; Period: 19/4/2017 – 19/4/2019; Jawatan: Harvester; Piece rate: RM30/mt FFB - Surat Tawaran Kerja Pekerja Tempatan/Asing ID # AT942933; Period: 6/7/2018 – 21/1/2019; Jawatan: Harvester; Piece rate: RM30/mt FFB <p>Contract workers for REM: Soko SK Enterprise</p> <ul style="list-style-type: none"> - Work permit; Employee ID # B7194444; Period: 20/7/2017 – 20/7/2019; Jawatan: Harvester - Work permit; Employee ID # B4065850; Period: 20/7/2017 – 20/7/2019; Jawatan: Harvester | <p>Complied</p> |
|--------------|--|--|-----------------|

RSPO Public Summary Report
Revision 7 (Aug /2018)

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|--|------------|
| | | <ul style="list-style-type: none"> - Work permit; Employee ID # B1571484; Period: 17/10/2017 – 8/12/2018; Jawatan: Harvester - Work permit; Employee ID # A7955259; Period: 21/8/2017 – 17/11/2018; Jawatan: Harvester <p>Sighted the salary payment for the contractors was based on piece-rate calculation as per following samples:</p> <ul style="list-style-type: none"> - FFB Bunch Count; <i>Borang Grading Tandan Harian Untuk Bunch Counter</i>; Field/Block: P14/1; Date: 21/9/2018; Total Bunch: 852 FFB Bunch Count; <i>Borang Grading Tandan Harian Untuk Bunch Counter</i>; Field/Block: P14/1 & P14/2; Date: 23/9/2018; Total Bunch: 2303 | |
| 6.5.3 | <p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.</p> <p>- Minor compliance –</p> | <p>Kulim (M) Berhad has provided free housing and medical assistance to all the workers. Water and electricity was provided without any charges from workers. Government school was found in the compound of Sindora complex. Linesite inspection was conducted on weekly basis by Hospital Assistant and twice a month together with VMO. Domestic water supplies was either from the government or own treatment with samples taken and sent for analysis to ensure compliance with drinking water standard for own treated water.</p> | Complied |
| 6.5.4 | <p>Growers and millers shall make demonstrable efforts to monitor and improve workers’ access to adequate, sufficient and affordable food.</p> <p>- Minor compliance –</p> | <p>Site visit to the coffee shop operates in the estate who is selling cooked foods, processed snacks and beverages at canteen and sundries shop. All the foods and drinks sold are displayed with price.</p> | Complied |
| <p>Criterion 6.6: The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p> | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|--|------------|
| 6.6.1 | A published statement in local languages recognising freedom of association shall be available. - Major compliance - | Kulim (M) Berhad has implemented Guidelines for General Workers where they respect the rights of the workers to join any association that recognized by the company. The guideline has distributed to each of the workers. Besides, the company has established Kulim Sustainability Handbook where under Core Labour Standards, the workers has been given rights to join or form trade union and to bargain collectively. SPO core labour values – Kulim Core Labour Value Plans | Complied |
| 6.6.2 | Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance - | Meeting with Union representatives was conducted on periodical basis at all operating units. In general, the meetings outcome highlighted the action plan to monitor the issues raised during the meeting was developed. The action plan was updated accordingly if any issue has been resolved. Sampled minutes of meetings sighted as following: <ul style="list-style-type: none"> - <i>Minit mesyuarat bersama NUPW/IW 2018; Bilik Mesyuarat Kilang Kelapa Sawit Sindora; Date: 14/3/2018</i> - <i>Minit mesyuarat bersama NUPW/IW 2018; Pejabat Ladang Sg. Papan; 26/9/2018; Minit Mesyuarat Jawatankuasa Kesatuan Pekerja & Pengurusan Ladang Sungai Papan 02/2018</i> - <i>Minit mesyuarat bersama stakeholder dan Kesatuan Sekerja (NUPW) 2018; Pejabat Ladang REM; 20/6/2018</i> - <i>Minit Mesyuarat Pengurusan Bersama Wakil Kesatuan Pekerja Ladang Sindora Bil.: 01/2018</i> | Complied |
| Criterion 6.7: Children are not employed or exploited. | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|--|--|------------|
| 6.7.1 | There shall be documentary evidence that minimum age requirements are met. - Major compliance - | <p>Kulim (M) Berhad has implemented Guidelines for General Workers and Kulim Sustainability Handbook where they will not employed Child Labour according to Children and Young Persons (Employment) Act 1966. Records of employee particulars sighted at all operating units as per following sample:</p> <p>Mill: No, based on the list of workers for Sindora Mill 2018.</p> <p>Estate: No, based on the list of workers (Local & Foreign) for Sg. Papan Estate as of 2018. Through document reviewed found that all the workers were above 18 years old. There were trainings entitled 'No Child Labour Policy' conducted at complex on 05/03/2017.</p> | Complied |
| <p>Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.</p> | | | |
| 6.8.1 | A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance - | Kulim (M) Berhad has implemented Kulim Sustainability Handbook dated June 2007 and Guidelines for General Workers. People Policy dated 1/1/2008 has been developed and the management is committed to support non-discrimination in any form. | Complied |
| 6.8.2 | Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance - | Migrant workers are recruited with 2 years contract for Indonesian and 3 years contract for Bangladeshi. Local workers are on a long term employment. No any kind of discrimination was noted. Job opportunities and amenities such as free housing, water and electricity supplies, medical care are given to all employees without discrimination. All employees are aware of the grievance procedures through the various Committees such as Gender Committee for women, foreign workers representation and union committee to highlight their concerns and grievances if any. | Complied |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|--|------------|
| 6.8.3 | It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance - | Recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. It was noted during the audit that there is no discrimination based on nationality, race, gender and age. | Complied |
| Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected. | | | |
| 6.9.1 | Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance - | Policy to prevent sexual and all other forms of harassment and violence has been updated as Kulim (Malaysia) Berhad Sexual Harassment Policy; Signed by Executive Director; Dated: 1/5/2018. Policy has been communicated latest in <i>Mesyuarat AJK Kelab Wanita Sindora 01/2018</i> ; Dated: 17/8/2018 and other samples as following: - <i>Mesyuarat Kelab Wanita Sungai Papan 01/2018; Ladang Sungai Papan</i> ; Date: 23/2/2018 <i>WOW REM Estate; Minit Mesyuarat WOW Yang Kedua</i> ; Date: 20/9/2018; <i>Minit Mesyuarat WW Yang Pertama</i> ; Date: 10/5/2018 | Complied |
| 6.9.2 | A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance - | A policy to protect the reproductive rights of all, especially of women established as Rights of Employees; Signed by Executive Director; Dated: 8/1/2017. Policy has been communicated to all workers by the management at each operating units within Sindora complex. Sighted latest was done on 20/9/2018. | Complied |
| 6.9.3 | A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance - | Specific grievance mechanism which respects anonymity and protects complainants as requested established with appointed <i>Panel Aduan Wanita; Semakan 1; 25/7/2008</i> among woman employees to receive the grievance if any for Sindora complex. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|---|------------|
| Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses. | | | |
| 6.10.1 | Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance - | Current and past FFB prices available in the mill as per MPOB guideline. The mill has displayed the FFB pricing from January to September 2018 at the weighbridge area. The pricing was according to MPOB set price. Grading guideline according to MPOB was publicly displayed at the weighbridge area. External uncertified purchased were based on Kulim’s SPO fair and transparent Dealings Program; dated 04/09/2007. | Complied |
| 6.10.2 | Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). - Major compliance - | FFB price calculation was documented in the contract agreement signed by the FFB suppliers. The calculation is based on the monthly spot month average prices of CPO and Palm Kernel for Peninsular Malaysia declared by MPOB. The monthly payments were made in three instalments. First instalment was made on or before 15 th of the month for FFB delivered in first 10 days. Second instalment was made on or before 25 th of the month for the next 10 days crop received and the last payment was made on or before 7 th day of the following month. | Complied |
| 6.10.3 | Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance - | All parties understand the contractual agreements they enter into as per evidence of fair, legal and transparent contracts made available as following samples: - Journal Voucher Being Purchases of FFB for the month of Aug 2018 # JV 0818/01B; Date: 31/8/2018; A/C Description: - Perniagaan Sri Misan; Purchase of FFB Agreement; Date: 20/11/2017; Validity: 1/1/2018 – 31/12/2018 - Eng Lee Heng Trading Sdn. Bhd.; Purchase of FFB Agreement; Date: 20/11/2017; Validity: 1/1/2018 – 31/12/2018 - Kind Action (M) Sdn. Bhd.; Purchase of FFB Agreement; Date: 1/1/2018; Validity: 1/1/2018 – 31/12/2018 | Complied |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|---|----------------|
| 6.10.4 | Agreed payments shall be made in a timely manner. - Minor compliance - | All payments were paid by head office upon received of invoices from the contractors. The payment were made within 30 days from the date of certification of submitted invoices. Interview with the contractors and suppliers confirmed that the payments were made promptly according to the contract agreement. | Complied |
| Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate. | | | |
| 6.11.1 | Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance - | Contributions made based on consultation as per SPO Corporate Social responsibility programs – Kulim Corporate Social Responsibility – samples: - <i>Sumbangan Program Motivasi UPSR 2018 SK Bukit Tongkat</i> , Payment voucher # 18000041; Date: 6/8/2018 - <i>Sumbangan Sambutan Hari Alam Sekitar 2017 Pusat Khidmat Masyarakat DUN Kemelah</i> ; Payment voucher # 17000668; Date: 25/9/2017 - <i>Donation for Pertandingan Badminton Antara Guru-guru SJK(T) Ladang Pasak</i> ; PCV Payment # 18000052; Date: 14/9/2018 <i>Donation for Majlis Konvokesyen dan Hari Anugerah Kecemerlangan Prasekolah SK Bandar, Kota Tinggi</i> ; PCV Payment # 17000061; Date: 30/11/2017 | Complied |
| 6.11.2 | Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance - | No scheme smallholder involved in the Sindora POM certification units. | Not applicable |
| Criterion 6.12: No forms of forced or trafficked labour are used. | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|---|------------|
| 6.12.1 | There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance - | Kulim (M) Berhad has implemented Kulim Sustainability Handbook dated June 2007. People Policy has been developed and the management is prohibited to engage or support the use of forced labour in all of their operations and administrations. All the local and foreign workers were hold a valid identification card and passports prior to work. Passport of the foreign workers were kept by the management where it stated in the employment contract Section 9 for safety purpose. The workers had acknowledged and agreed on the safe keeping of passport. | Complied |
| 6.12.2 | Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance – | Sindora Mill Complex has the <i>Polisi Insan</i> which mentioning the non-discriminatory practices and decent living condition. The policy of 'No Contract Substitution' was established with the agreed timeline for corrective action plan for Employees approved by the Deputy General Manager. | Complied |
| 6.12.3 | Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance - | Established as Kulim (Malaysia) Berhad Core Labour Standard; Signed by Executive Director; Dated: 1/5/2018. Sampled Contractor's workers agreement as in indicator 6.5.2 above. | Complied |
| Criterion 6.13: | | | |
| Growers and millers respect human rights. | | | |
| 6.13.1 | A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance - | Sindora Mill Complex has the <i>Polisi Insan</i> which mentioning the non-discriminatory practices and decent living condition. The policy of 'No Contract Substitution' was established with the agreed timeline for corrective action plan for Employees approved by the Deputy General Manager. Policy has been communicated to all workers by the management at each operating units within SIndora complex. Sighted latest was done on 20/9/2018. | Complied |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|---|----------------|
| 6.13.2 | As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation. | Not applicable for Peninsular Malaysia. | Not applicable |
| Principle 7: Responsible development of new plantings | | | |
| Sindora Palm Oil Mill Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this recertification assessment. The immature areas are replanted area. | | | |
| Principle 8: Commitment to continual improvement in key areas of activity | | | |
| Criterion 8.1: Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations. | | | |

| Criterion / Indicator | Assessment Findings | Compliance | | | | | | | | | | | | |
|--|--|------------|--------|-----------|--|------------|--|----------|---|----------|---|--------|--|-----------------|
| <p>8.1.1</p> <p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); <ul style="list-style-type: none"> • Optimising the yield of the supply base. - Major compliance - | <p>Sindora POM certification unit has initiated a continual improvement plan for 2018 based on a consideration of the main social and environmental impacts and opportunities of the grower/mill. Summary of the latest improvement plan:</p> <table border="1" data-bbox="1028 557 1659 1214"> <thead> <tr> <th>Operation</th> <th>Action</th> </tr> </thead> <tbody> <tr> <td>Community</td> <td>Educate on preventing wastage and safety at housing area</td> </tr> <tr> <td>Harvesting</td> <td>Find new technology to reduce noise of the machine during transfer FFB</td> </tr> <tr> <td>Workshop</td> <td>Train properly on handling vehicle and followed as per SOP work instruction</td> </tr> <tr> <td>Manuring</td> <td>To reduce leaching into field drain by monitor and maintain accurate fertilizer application</td> </tr> <tr> <td>Office</td> <td>Use paper to educate workers on preventing wastage and segregate the waste</td> </tr> </tbody> </table> | Operation | Action | Community | Educate on preventing wastage and safety at housing area | Harvesting | Find new technology to reduce noise of the machine during transfer FFB | Workshop | Train properly on handling vehicle and followed as per SOP work instruction | Manuring | To reduce leaching into field drain by monitor and maintain accurate fertilizer application | Office | Use paper to educate workers on preventing wastage and segregate the waste | <p>Complied</p> |
| Operation | Action | | | | | | | | | | | | | |
| Community | Educate on preventing wastage and safety at housing area | | | | | | | | | | | | | |
| Harvesting | Find new technology to reduce noise of the machine during transfer FFB | | | | | | | | | | | | | |
| Workshop | Train properly on handling vehicle and followed as per SOP work instruction | | | | | | | | | | | | | |
| Manuring | To reduce leaching into field drain by monitor and maintain accurate fertilizer application | | | | | | | | | | | | | |
| Office | Use paper to educate workers on preventing wastage and segregate the waste | | | | | | | | | | | | | |

Appendix B: Approved Time Bound Plan

| Project | Estate | Plan |
|-----------------|-------------------------------------|------|
| SUMSEL | PT Tempirai Palm Resources (PT TPR) | 2025 |
| | PT Rambang Agro Jaya (PT RAJ) | |
| Malaysia Trader | Eng Lee Heng | 2019 |
| Malaysia Group | Bukit Layang Estate | 2019 |

| List of Estate Manage by Kulim (Malaysia) Berhad | | | |
|--|----------------------|----------------|----------------|
| Mill Base | Kulim / Jcorp Estate | Estate | Status |
| Tereh Mill | Kulim Estate | Tereh Utara | Certified RSPO |
| | | Tereh Selatan | |
| | | Selai | |
| | | Enggang | |
| | | Mutiara | |
| | | Sg Sembrong | |
| | | Sg Tawing | |
| | | Rengam | |
| Sedenak Mill | | Sedenak | |
| | | Basir Ismail | |
| | | Ulu Tiram | |
| Sindora Mill | | Kuala Kabong | |
| | | REM/Pasak | |
| | | Sindora | |
| Palong Mill | | Sungai Papan | |
| | | Sepang Loi | |
| | | UMAC | |
| | | Labis Bahru | |
| | | Mungka | |
| | | Kemedak | |
| | Palong | | |
| Pasir Panjang Mill | Kulim Estate | Pasir Panjang | Certified RSPO |
| | | Siang | |
| | Jcorp Estate | Bukit Kelompok | |
| | | Tunjuk Laut | |

**RSP0 Public Summary Report
Revision 7 (Aug /2018)**

| | | | |
|--|--|--------------|--|
| | | Pasir Logok | |
| | | Bukit Payung | |

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in **2017** for **Sindora Palm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

- i. Estates area planted data
- ii. Fuel consumed
- iii. Mill datas include CPO produced, PKO Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in **2017** for **Sindora Palm Oil Mill** and supply base are as following:

| Emission per product | tCO ₂ e/tProduct |
|----------------------|-----------------------------|
| CPO | 1.16 |
| PKO | 0 |

| Extraction | % |
|------------|-------|
| OER | 20.38 |
| KER | 5.45 |

| Production | t/yr |
|--------------|---------|
| FFB Process | 242,308 |
| CPO Produced | 49,378 |
| PKO Produced | 13,209 |

| Land Use | Ha |
|-----------------------------|----------|
| OP Planted Area | 27908.71 |
| OP Planted on peat | 0 |
| Conservation (forested) | 209.7 |
| Conservation (non-forested) | 0 |
| Total | |

FFB Process

Own – 139,243.48

Group – 9,354.56

Summary of Field Emission and Sink

| | Own Crop* | | Group | | 3 rd Party | | Total | |
|--|--------------------|--------------------------|--------------------|--------------------------|-----------------------|--------------------------|--------------------|--------------------------|
| | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB |
| Emission | | | | | | | | |
| Land Conversion | 69696.12 | 0.54 | 13.85 | 0.35 | 76935.91 | 0.72 | 146645.9 | 1.61 |
| CO ₂ Emission from fertilizer | 3975.65 | 0.03 | 1.7 | 0.04 | 1530.25 | 0.02 | 5507.6 | 0.09 |
| NO ₂ Emmission | 5548.52 | 0.04 | 1.23 | 0.03 | 912.29 | 0.01 | 6462.04 | 0.08 |
| Fuel Consumption | 2280.36 | 0.28 | 0.09 | 0 | 690.82 | 0.01 | 2971.27 | 0.29 |
| Peat Oxidation | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Sink | | | | | | | | |
| Crop Sequestration | -65740.13 | -8.02 | -13.12 | -0.33 | -56342.08 | -0.49 | -122095 | -8.84 |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| | | | | | | | | |
|----------------------------|----------|------|------|------|----------|------|----------|-------|
| Conservation Sequestration | -14.11 | 0.12 | 0 | 0 | 0 | 0 | -14.11 | 0.12 |
| Total | 15746.41 | 0.12 | 3.71 | 0.09 | 23727.19 | 0.26 | 39477.35 | -6.65 |

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

| | tCO ₂ e | tCO ₂ e/tFFB |
|------------------------------|--------------------|-------------------------|
| Emission | | |
| POME | 39873.4 | 0.16 |
| Fuel Consumption | 365.41 | 0 |
| Grid Electricity Utilisation | 134.2 | 0 |
| Credit | | |
| Export of Grid Electricity | 0 | 0 |
| Sales of PKS | -7276.63 | -0.03 |
| Sales of EFB | 0 | 0 |
| Total | 33096 | 0.14 |

Summary of Kernel Crusher Emission and Credit (if applicable)

| Emissions | tCO ₂ e |
|--------------------------------|--------------------|
| PK from own mill | 15316.59 |
| PK from other source | 0 |
| Fuel Consumptions | 0 |
| Total Crusher emissions | 0 |

*This mill has no kernel crusher operation.

| Palm Oil Mill Effluent (POME) Treatment: | |
|---|----|
| Divert to Compost (%) | 33 |
| Divert to anaerobic diversion (%) | 67 |

| POME Diverted to Anaerobic Digestion: | |
|--|-----|
| Divert to anaerobic pond (%) | 100 |
| Divert to methane captured (flaring) (%) | 0 |
| Divert to methane captured (energy generation) (%) | 0 |

Appendix D: General Chain of Custody Requirements for the Supply Chain

| General Chain of Custody Requirements for the Supply Chain | | | |
|--|---|---|--|
| Requirement | | Evidence | Compliance (Yes/No/N/A) *Justification is required for N/A |
| 5.1 Applicability of the general chain of custody requirements for the supply chain | | | |
| 5.1.1 | The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification. | Sindora POM takes the legal ownership and physically handles RSPO certified FFB from the estates and produce CPO and PK. The Sustainable Management System, Traceability, Doc. No: SQD/SMS/1.2 Date 1 July 2018 is available for RSPO SCC. | Complied |
| 5.1.2 | Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model. | Sindora POM is not receiving the FFB from traders or distributor and itself not at trader or distributor, therefore no license required. | Complied |
| 5.1.3 | Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform. | The Palmtrace ID for Sindora POM: RSPO_PO1000001264 | Complied |
| 5.1.4 | Processing aids do not need to be included within an organization’s scope of certification. | This is not refinery, therefore no processing aids is included. | N/A |
| 5.2 Supply chain model | | | |

| | | | |
|-----------------------------------|--|---|----------------------|
| 5.2.1 | The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance. | Sindora POM is using the MB supply chain model since it receive the FFB from own supply bases and outside FFB suppliers. For buyer who doesn't require RSPO certified CPO or PK, downgrading can be done from certified material to non-certified material. | Complied |
| 5.2.2 | The site can use one (1) or a combination of supply chain models as audited and certified by the CB. | Sindora POM is using the MB supply chain model since it receive the FFB from own supply bases and outside FFB suppliers. | Complied |
| 5.3. Documented Procedures | | | |
| 5.3.1 | The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: <ul style="list-style-type: none"> Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. | The SOP Sustainable Management System, Traceability, Doc. No: SQD/SMS/1.2 Date 1 July 2018. However, the activity of CPO and PK sales transaction is not covered under the Traceability procedure. Management has the SOP: CSPO Supply Chain Rev: 00 Procedure No: MKD/001 dated 08 February 2012. Both procedures are not updated and cross-referenced with RSPO SCC Standard Version June 2017 & RSPO Rules on Market Communications & Claims (version 2016). | Major Non-Compliance |
| | <ul style="list-style-type: none"> Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). | The RSPO SCC training & traceability has been conducted on 29.03.2018 at Sindora Mill attended by 6 attendants from various position such as auxiliary police, weighbridge operators, general clerk etc. Further records verified as per 5.4.1 and 5.6.1. | Complied |
| | <ul style="list-style-type: none"> Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization's procedures for the implementation of this standard. | The person having overall responsibility for and authority over the implementation is Head of each operating unit for RSPO, MSPO and ISCC Certification Program, as per appointment letter SQD/ADMIN/020/2018, 30 th June 2018. | Complied |

| | | | |
|--|---|--|----------|
| 5.3.2 | <p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> | <p>The Sustainable Management System, Internal Audit Doc. No: SQD/SMS/5.0 Date 1 July 2018 as the Internal Audit Procedure where the SCC audit shall be conducted as per Internal Audit Process which covers internal audit schedule (plan), audit report, non-conformance report, correction and corrective action, review and closing the NCR.</p> | Complied |
| | <p>ii) Effectively implements and maintains the standard requirements within its organization.</p> | <p>As per SOP, the management has conducted the Internal Audit at least once within 12 months (before the expiry of the certificate). Internal audit Non-conformance Report and Internal Audit checklist dated 30 July 2018 sighted for Sindora POM and available during the audit.</p> | Complied |
| <p>5.4. Purchasing and goods in – 1.</p> | | | |
| 5.4.1 | <p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number | <p>The records are checked for both internal and external FFB suppliers as below:</p> <ol style="list-style-type: none"> 1. Contract external FFB suppliers (non-RSPO) Document date: 20.11.2017 Expiry date: 13.12.2018 Name & address of buyer: Sindora Berhad, Johor Bahru Name & address of seller: Nilai Megah Sdn Bhd, Kluang Products: FFB Processing charge: RM 45-50. 2. Weighbridge ticket: 010621 Date: 30.09.2018 Name & address of buyer: Sindora Berhad, Johor Bahru Name & address of seller: Nilai Megah Sdn Bhd, Kluang Products: FFB Net weight: 6,230 kg Vehicle No: JPR 3965 | Complied |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| | | | |
|--|--|--|-----------------|
| | | <p>3. Internal FFB suppliers (RSPO) Weighbridge ticket: 010645 Date: 30.09.2018 Name & address of buyer: Sindora POM, Johor Bahru Name & address of seller: Sungai Papan Estate, Kota Tinggi Products: FFB (RSPO Certified FFB/Mass Balance) Net weight: 37,900 kg Vehicle No: JGK 9555 RSPO Cert No: RSPO 612392</p> | |
| | <ul style="list-style-type: none"> Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). | <p>Information gathered through multiple records as per 5.4.1 above.</p> | <p>Complied</p> |
| | <ul style="list-style-type: none"> The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance. | <p>Sindora POM receive the FFB from own estates and outside suppliers and the mechanism to check the validity of supply chain certification and no. of suppliers are through the RSPO certificate attached in every sales document.</p> <p>This is also refer to the CSPO Supply Chain SOP No: MKD/001, 08.02.2012 Revision 00.</p> <p>Sampled the shipping announcements:</p> <p>Site has the shipping announcement made on 24.09.18 for the above transaction as per 5.6.1.</p> <p>Transaction ID: TR-5d87e397-6569, quantity 35.38 MT product: CSPO MB.</p> | <p>Complied</p> |
| | <ul style="list-style-type: none"> A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website | <p>Sindora POM receive the FFB from own estates and outside suppliers and the mechanism to check the validity of supply chain</p> | <p>Complied</p> |

| | | | |
|---|--|--|-----------------------------|
| | <p>(www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements.</p> | <p>certification and no. of suppliers are through the RSPO certificate attached in every sales document.</p> <p>This is also refer to the CSPO Supply Chain SOP No: MKD/001, 08.02.2012 Revision 00.</p> | |
| | <ul style="list-style-type: none"> The validity of license for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements. | <p>No traders or distributors used in Sindora POM.</p> | <p>Complied</p> |
| 5.4.2 | <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p> | <p>Sindora POM has the SOP, Core Process, Control of Non-Conforming Product, Doc. NoL SNPOM/SOP/8.20 dated 01 Jan 2018 but so far, no non-conforming product related to RSPO reported however it is not cover on the FFB handling.</p> | <p>Major Non-Compliance</p> |
| <p>5.5. Outsourcing activities –</p> | | | |
| 5.5.1 | <p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p> | <p>Sindora POM has use the service of transporter to transport CPO to buyer’s site. Sampled below contractor: Yew Tan Enterprise for Transport of CPO from Mahamurni Plantations Sdn Bhd Group Mills to Various Refineries. Contract no: MPSB/CPO 1/2016(YEWTAN), dated 25.02.2018, originally scheduled for completion on 28.02.2018 be extended to complete on 29.02.2020.</p> <p>However, outsourced activities is not included in the RSPO supply chain certificate scope.</p> | <p>Complied</p> |
| 5.5.2 | <p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a. The site has legal ownership of all input material to be included in outsourced processes;</p> | <p>Not applicable. Outsourced activities is not included in the RSPO supply chain certificate scope.</p> | <p>Not applicable</p> |

| | | | |
|-----------------------------------|---|---|----------------|
| | b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. | Not applicable. Outsourced activities is not included in the RSPO supply chain certificate scope. | Not applicable |
| | c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. | Not applicable. Outsourced activities is not included in the RSPO supply chain certificate scope. | Not applicable |
| | d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance. | Not applicable. Outsourced activities is not included in the RSPO supply chain certificate scope. | Not applicable |
| 5.5.3 | The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products. | Not applicable. Outsourced activities is not included in the RSPO supply chain certificate scope. | Not applicable |
| 5.5.4 | The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products. | Not applicable. Outsourced activities is not included in the RSPO supply chain certificate scope. | Not applicable |
| 5.6. Sales and goods out – | | | |
| i. | | | |
| 5.6.1 | The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form. <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; | Sales goods out document sighted: From October 2017-Sept 2018, the data of outgoing CPO and PK presented in ISCC Sustainable Products Daily and Monthly Movement Summary Report year 2017 & 2018 (includes RSPO produced and stock). | Complied |

| | | |
|--|--|--|
| <ul style="list-style-type: none"> • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number | <p>As per Procedure: CSPO Supply Chain SOP No: MKD/001, 08.02.2012 Revision 00, MKD shall make the shipping announcement via eTrace immediate after CSPO delivery and invoices have been issued.</p> <p>Sighted the sales contract:</p> <ol style="list-style-type: none"> 1. Domestic sale/Purchase contract for Malaysian Crude Unbleached Palm Oil: Contract no MPO 1811 2. Date: 20.02.2018 3. Product: Crude Palm Oil in Bulk 4. Quantity: 500 MT 5. Buyer: XYZ 6. Seller: Mahamurni Plantations Sdn Bhd <p>Weighbridge Ticket:</p> <ol style="list-style-type: none"> 1. WB ticket: C00585 2. Date: 12.07.2018 3. Product: CPO 4. Quantity: 29,880 kg 5. Certificate No: RSPO 612392 6. Vehicle: NAU 3025 <p>Sighted the sales contract:</p> <ol style="list-style-type: none"> 7. Domestic sale/Purchase contract for Malaysian Crude Unbleached Palm Oil: Contract no MPO 1819 8. Date: 27.02.2018 9. Product: Crude Palm Oil in Bulk 10. Quantity: 500 MT 11. Buyer: XYZ 12. Seller: Mahamurni Plantations Sdn Bhd <p>Weighbridge Ticket:</p> | |
|--|--|--|

| | | | |
|--|---|---|----------|
| | | <p>7. WB ticket: C00835 8. Date: 12.09.2018 9. Product: CPO 10. Quantity: 35,380 kg 11. Certificate No: RSPO 612392 12. Vehicle: JKE 6822</p> <p>Transaction ID: TR-5d87e3976569 quantity 35.38 MT product: CSPO MB, Buyer: XYZ, date: 12.09.2018.</p> | |
| | <ul style="list-style-type: none"> Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). | Information gathered through multiple records as per 5.6.1 above. | Complied |
| | <ul style="list-style-type: none"> For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance. | <p>Site has the shipping announcement made on 24.09.2018 for the above transaction as per 5.6.1.</p> <p>Transaction ID: TR-5d87e3976569 quantity 35.38 MT product: CSPO MB, Buyer: Carotino Sdn Bhd, date: 12.09.2018.</p> | Complied |
| 5.7. Registration of transactions | | | |
| 5.7.1 | <p>Supply chain actors who:</p> <ul style="list-style-type: none"> Are mills, traders, crushers and refineries and; Take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. | <p>Sindora POM is a mill and takes legal ownership and/or physically handle RSPO CSPO.</p> <p>Sindora POM has the Palmtrace id: RSPO_PO1000001264.</p> | Complied |
| 5.7.2 | The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: | The shipping announcement sampled as below: | Complied |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| | | | |
|----------------------|--|---|----------|
| | <ul style="list-style-type: none"> Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. | <p>Site has the shipping announcement made on 24.09.2018 for the above transaction as per 5.6.1.</p> <p>Transaction ID: TR-5d87e3976569 quantity 35.38MT product: CSPO MB</p> | |
| | <ul style="list-style-type: none"> Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. | <p>The volume for RSPO certified is monitored through the fixed account system and palmtrace transaction id.</p> | Complied |
| | <ul style="list-style-type: none"> Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. | <p>There is ISCC scheme used in Sindora POM and monitored in the same Sustainable Products Daily and Monthly Movement Summary Report for Sindora Palm Oil Mill.</p> | Complied |
| | <ul style="list-style-type: none"> Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. | <p>Sindora POM has kept all the RSPO certified volume through shipping announcement in Palmtrace. Seen the records for 1 year from Sept 17 – Sept 18.</p> | Complied |
| 5.8. Training | | | |
| 5.8.1 | <p>The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.</p> | <p>The RSPO SCC training & traceability has been conducted on 29.03.2018 at Sindora Mill attended by 6 attendants from various position such as auxiliary police, weighbridge operators, general clerk etc.</p> <p>Further records verified as per 5.4.1 and 5.6.1.</p> | Complied |
| 5.8.2 | <p>Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.</p> | <p>The RSPO SCC training & traceability has been conducted on 29.03.2018 at Sindora Mill by Assistant Manager attended by 6 attendants from various position such as auxiliary police, weighbridge operators, general clerk etc.</p> | Complied |

| | | | |
|---------------------------------|---|---|----------|
| | | Further records verified as per 5.4.1 and 5.6.1. | |
| 5.9. Record Keeping – | | | |
| 5.9.1 | The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements. | Sindora POM has keep the records such as SOP, training, Palmtrace transactions, sales contracts, internal audit and management review as per RSPO SCC Standard 2017 requirement. Sampled seen as per 5.4.1, 5.6.1. | Complied |
| 5.9.2 | Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. | The records are kept for minimum 3 years as per SOP Support Process, Control of Documented Information, Doc No: SNPOM/SOP/7.6 dated: 01.01.2018. All records kept in the weighbridge office. Sampled the last 2 years dated 30.05.16, Weighbridge Ticket, Transaction No: 90,906 Supplier: Ladang Pasak, Product FFB, Nett weight: 30,430 kg | Complied |
| 5.9.3 | The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months. | Sindora POM has using the fixed accounting system where every 3 monthly balance monitored in Sustainable Products Daily and Monthly Movement Summary Report for Sindora Palm Oil Mill. Sighted the data for 1 year cycle from Sept 17-Sept 18. | Complied |
| 5.10. Conversion factors | | | |
| 5.10.1 | Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleo-chemicals and its Derivatives. This is relevant for derivatives of Palm Oil | This is Palm Oil Mill, so no conversion rate is used. The CPO and PK was extracted based on past actual rate. | Complied |

| | | | |
|---|--|--|----------|
| | and Palm Kernel Oil, as used in the oleo-chemical and personal care industries. | | |
| 5.10.2 | Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate. | Conversion rate is based on actual OER and KER to define the actual production of palm product. For the last period, OER recorded at 20. 60% and 5.35% for KER. | Complied |
| 5.11. Claims – | | | |
| 1. | | | |
| 5.11.1 | The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims. | Management has not use any claim on the trademark and logo. However, company has apply the RSPO Trademark license number: 1-0080-09-100-00 with expiry date: 15.08.2019 in case in future they will be using any of the trademark. So far, no logo/trademark used in the products. | Complied |
| General corporate communications | | | |
| 4.1 | A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim. | Sindora POM is not using any 'off-product' claim. During site visit, it is observed that no RSPO trademark or logo used in facilities, storage tanks or transportation as well as documentation such as business card, letterhead and files. | N/A |
| 4.2 | In corporate communications a member is allowed to: a. display its RSPO membership status b. display the RSPO web address (www.rsपो.орг) c. state that the member supports the work of the RSPO d. state the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. | Sindora POM is not using any 'off-product' claim. During site visit, it is observed that no RSPO trademark or logo used in facilities, storage tanks or transportation as well as documentation such as business card, letterhead and files. | N/A |

| | | | |
|--|---|--|-----|
| | Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page. | | |
| 4.3 | In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products. | Sindora POM is not using any 'off-product' claim. During site visit, it is observed that no RSPO trademark or logo used in facilities, storage tanks or transportation as well as documentation such as business card, letterhead and files. | N/A |
| 4.4 | Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products. | Sindora POM is not using any 'off-product' claim. During site visit, it is observed that no RSPO trademark or logo used in facilities, storage tanks or transportation as well as documentation such as business card, letterhead and files. | N/A |
| 4.5 | Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat. | Sindora POM is not using any 'off-product' claim. During site visit, it is observed that no RSPO trademark or logo used in facilities, storage tanks or transportation as well as documentation such as business card, letterhead and files. | N/A |
| Business to business communications | | | |
| 5.1 | Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products. | Sindora POM did not use business to business communications for their products which are CPO and PK therefore, this requirement is not applicable. | N/A |
| 5.2 | When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made. | Sindora POM did not use business to business communications for their products which are CPO and PK therefore, this requirement is not applicable. | N/A |
| 5.3 | Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: | Sindora POM did not use business to business communications for their products which are CPO and PK therefore, this requirement is not applicable. | N/A |

| | | | |
|---|---|--|-----|
| | <p>A. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>B. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p> | | |
| 5.4 | <p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p> | Sindora POM did not use business to business communications for their products which are CPO and PK therefore, this requirement is not applicable. | N/A |
| Business to consumer communication | | | |
| 6.1 | <p>Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.</p> | Sindora POM did not use business to consumer communications for their products which are CPO and PK therefore, this requirement is not applicable. | N/A |

| | | | |
|-----|---|--|-----|
| 6.2 | Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below. | Sindora POM did not use business to consumer communications for their products which are CPO and PK therefore, this requirement is not applicable. | N/A |
| 6.3 | When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present. | Sindora POM did not use business to consumer communications for their products which are CPO and PK therefore, this requirement is not applicable. | N/A |
| 6.4 | Business to consumer communication shall not include information about the claimant's RSPO membership status. | Sindora POM did not use business to consumer communications for their products which are CPO and PK therefore, this requirement is not applicable. | N/A |
| 6.5 | Members shall not communicate to consumers information about their suppliers' RSPO membership status. | Sindora POM did not use business to consumer communications for their products which are CPO and PK therefore, this requirement is not applicable. | N/A |
| 6.6 | Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient. | Sindora POM did not use business to consumer communications for their products which are CPO and PK therefore, this requirement is not applicable. | N/A |
| 6.7 | Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim. | Sindora POM did not use business to consumer communications for their products which are CPO and PK therefore, this requirement is not applicable. | N/A |
| 6.8 | RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified | Sindora POM did not use business to consumer communications for their products which are CPO and PK therefore, this requirement is not applicable. | N/A |

| | | | |
|---|---|--|------------|
| | <p>supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p> | | |
| <p>MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES</p> | | | |
| <p>Certified oil palm content (IP)</p> | | | |
| | <p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p> | <p>Sindora POM is using MB SC Model.</p> | <p>N/A</p> |
| <p>Labelling and trademark (IP)</p> | | | |
| | <p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> a. RSPO trademark which includes the tag 'CERTIFIED' or • RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. | <p>Sindora POM is using MB SC Model.</p> | <p>N/A</p> |

| | | | |
|---|---|---|------------|
| Messaging (IP) | | | |
| | <p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. | <p>Sindora POM is using MB SC Model.</p> | <p>N/A</p> |
| MODULE B – MASS BALANCE SPECIFIC RULES | | | |
| Auditor Hint: | | | |
| This specific rules shall be audited concurrently with the relevant Module C (including Module F & G) under the Supply Chain Modular Requirements | | | |
| Minimum Mass Balance content | | | |
| | <p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the</p> | <p>Sindora POM is producing CPO & PK as final product, and not using any percentage/formula for mass balance, therefore this requirement is not applicable.</p> | <p>N/A</p> |

| | | | |
|--|---|--|------------|
| | <p>requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p> | | |
| <p>Labelling and trademark (MB)</p> | | | |
| | <p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. | <p>Sindora POM is not using RSPO trademark or logo. During site visit, it is observed that no RSPO trademark or logo used in facilities, storage tanks or transportation as well as documentation such as business card, letterhead and files.</p> | <p>N/A</p> |
| <p>Messaging (MB)</p> | | | |
| | <p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the | <p>Sindora POM is not using RSPO trademark or logo. During site visit, it is observed that no RSPO trademark or logo used in facilities, storage tanks or transportation as well as documentation such as business card, letterhead and files.</p> | <p>N/A</p> |

| | | | |
|---|---|--|------------|
| | <p>supply chain.</p> <ul style="list-style-type: none"> • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed. | | |
| | <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. | <p>Sindora POM is not using RSPO trademark or logo. During site visit, it is observed that no RSPO trademark or logo used in facilities, storage tanks or transportation as well as documentation such as business card, letterhead and files.</p> | <p>N/A</p> |
| <p>MODULE C – PARTIAL PRODUCT CLAIMS</p> | | | |
| | <p>To increase awareness among consumers of the availability of sustainable oil palm products and to help accelerate the uptake, it is permissible to make a claim on product when the percentage of the oil palm content is less than 95% certified, but only when the following conditions have been met:</p> <ul style="list-style-type: none"> • The member making the claim is the end product manufacturer, is an RSPO member and is certified against the RSPO SCCS or is an RSPO retailer member authorized to use the trademark by the RSPO. • At least 50% of the oil palm content has been supplied through an RSPO certified supply chain as IP, SG or MB. • The remainder of the oil palm content that is not RSPO-certified is covered by the purchase of RSPO Credits to an equivalent volume. The product-specific claim is limited to only the following phrase: 'This product contributes to the production of certified sustainable palm oil'. The use of | <p>Sindora POM is not using RSPO trademark or logo. During site visit, it is observed that no RSPO trademark or logo used in facilities, storage tanks or transportation as well as documentation such as business card, letterhead and files.</p> | <p>N/A</p> |

| | | | |
|---|---|---|----------|
| | the RSPO label with this claim is mandatory and must include the tag '50% MIXED'. No other percentage is allowable within this claim. | | |
| MODULE D – COMBINED SUPPLY CHAIN MODELS SPECIFIC RULES | | | |
| | Where a mixture of inputs supplied through different RSPO supply chain models are present in a product, the following applies: 75% IP + 20% SG => 95% SG claim is made 65% SG + 30% MB => 95% MB claim is made 55% MB + 40% B&C => 95% partial product claim can be made 45% SG + 55% B&C < 50% B&C claim can be made | Sindora POM is not using RSPO trademark or logo. During site visit, it is observed that no RSPO trademark or logo used in facilities, storage tanks or transportation as well as documentation such as business card, letterhead and files. | N/A |
| | Where one supply chain model accounts for 95% of the oil palm content, the claim for this specific model may be made: 95% IP + 5% MB => 95% IP IP claim can be made 95% SG + 5% MB => 95% SG SG claim can be made 95% MB + 5% C => 95% MB MB claim can be made | Sindora POM is not using RSPO trademark or logo. During site visit, it is observed that no RSPO trademark or logo used in facilities, storage tanks or transportation as well as documentation such as business card, letterhead and files. | N/A |
| 5.12. Complaints | | | |
| 5.12.1 | The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints. | The complaint are regarding quality of FFB sent to mills received so far, no other issue captured. The records are available since 2016. | Complied |
| 5.13. Management Review | | | |
| 5.13.1 | The organization is required to hold management reviews annually at planned intervals appropriate to the scale and nature of the activities undertaken | As per SOP, Sindora Mill is carry out the management review annually at planned intervals. | Complied |

| | | | |
|--------|---|---|----------|
| 5.13.2 | <p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. | <p>Seen the latest Management Review dated 01.08.18 and cover input:</p> <ol style="list-style-type: none"> 1. Follow Up Action From Previous Meeting. 2. Follow-up Action from Management Reviews. 3. Audit findings –Internal & External Audit covering RSPO SCC Standard –No NCs been raised. 4. Customer feedback: Communication from interested parties including complaints. 5. Status of preventive and corrective actions: 6. Changes that could affect the management system: Changes in internal and external issues (relevant to RSPO SCCS). – No change in legislation. 7. Recommendation for improvement –Area for continual improvement. (Environmental, OSHA and Social). 8. Other matters | Complied |
| 5.13.3 | <p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes • Resource needs. | <p>Seen the latest Management Review dated 01.08.18 and cover output:</p> <ol style="list-style-type: none"> 1. Improvement of the effectiveness of the management system and its processes –Analysis data for Kernel Extraction efficiency, Oil Extraction efficiency). 2. Resource needs. (Analysis data to training executive/staff, etc.) | Complied |

Appendix E: CPO Mill Supply Chain Assessment Report (Module E - CPO Mills: Mass Balance)

| Requirements | Evidence For any N/A raised, justification is required. | Compliance (Yes / No or N/A) |
|--|--|---------------------------------|
| E.1 Definition | | |
| E.1.1 Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB. | Sindora Palm Oil Mill receives and process certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During this recertification assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and sales volume of RSPO certified palm products through RSPO IT System. | Complied |
| E.2 Explanation | | |
| E.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage | The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. Actual production recorded in Section 1. | Complied |

| | | |
|---|--|-----------------|
| <p>produced should then be recorded in each subsequent annual surveillance report.</p> | | |
| <p>E.2.2 The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p> | <p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p> <p>Sighted the sales contract:</p> <ul style="list-style-type: none"> 13. Domestic sale/Purchase contract for Malaysian Crude Unbleached Palm OIL: Contract no MPO 1819 14. Date: 27.02.2018 15. Product: Crude Palm Oil in Bulk 16. Quantity: 500 MT 17. Buyer: Carotino Sdn Bhd 18. Seller: Mahamurni Plantations Sdn Bhd <p>Weighbridge Ticket:</p> <ul style="list-style-type: none"> 13. WB ticket: C00835 14. Date: 12.09.2018 15. Product: CPO 16. Quantity: 35,380 kg 17. Certificate No: RSPO 612392 18. Vehicle: JKE 6822 <p>Transaction ID: TR-5d87e3976569 quantity 35.38 MT product: CSPO MB, Buyer: Carotino Sdn Bhd, date: 12.09.2018.</p> | <p>Complied</p> |
| <p>E.3 Documented procedures</p> | | |
| <p>E.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</p> | <p>The SOP Sustainable Management System, Traceability, Doc. No: SQD/SMS/1.2 Date 1 July 2018 and SOP: CSPO Supply Chain Rev: 00 Procedure No: MKD/001 dated 08 February 2012.</p> | <p>Complied</p> |

| | | |
|--|---|-----------------|
| <p>b) The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.</p> | <p>The person having overall responsibility for and authority over the implementation is Head of each operating unit for RSPO, MSPO and ISCC Certification Program, as per appointment letter SQD/ADMIN/020/2018, 30th June 2018.</p> | |
| <p>E.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBS.</p> | <p>The SOP is as per requirement E.3.1</p> | <p>Complied</p> |
| <p>E.4 Purchasing and goods in</p> | | |
| <p>E.4.1 The site shall verify and document the volumes of certified and non-certified FFBS received.</p> | <p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and non-certified FFB. There are diversion of FFB for the period of October 2017-August 2018.</p> | <p>Complied</p> |
| <p>E.4.2 The site shall inform the CB immediately if there is a projected overproduction.</p> | <p>So far, no overprojection of certified tonnage and management will inform accordingly if there is any.</p> | <p>Complied</p> |
| <p>E.5 Record keeping</p> | | |
| <p>E.5.1 a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.</p> <p>(b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)</p> | <p>Sindora POM has using the fixed accounting system where every 3 monthly balance monitored in Sustainable Products Daily and Monthly Movement Summary Report for Sindora Palm Oil Mill. Sighted the data for 1 year cycle from Sept 17-Sept 18.</p> | <p>Complied</p> |

| | | |
|--|--|-----------------|
| <p>E.5.2 In cases where a mill outsources activities to an independent palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement</p> | <p>This is Palm Oil Mill, so no conversion rate is used. The CPO and PK was extracted based on past actual rate.</p> | <p>Complied</p> |
|--|--|-----------------|

RSPO Public Summary Report
Revision 7 (Aug /2018)

Supply Chain Declaration *(Applicable For Appendix E)*

| A. Monthly Records of Certified and Uncertified FFB Received since the last audit | | | | |
|--|---------------------|---|---|-----------------------------|
| No. | Month - Year | Volume of FFB from certified supply bases (mt) | Volume of FFB from uncertified supply bases (mt) | Total FFB/Month (mt) |
| 1 | Oct 17 | 13,987.33 | 10,274.84 | 24,262.17 |
| 2 | Nov 17 | 15,043.34 | 10,401.68 | 25445.02 |
| 3 | Dec 17 | 12,573.32 | 13,038.4 | 25611.72 |
| 4 | Jan 18 | 11,050.22 | 7,911.05 | 18961.27 |
| 5 | Feb 18 | 7,512.03 | 7,521.28 | 15033.31 |
| 6 | Mar 18 | 5,039.15 | 7,083.82 | 12122.97 |
| 7 | Apr 18 | 7,575.25 | 9,183.98 | 16759.23 |
| 8 | May 18 | 11,225.82 | 7,439.73 | 18665.55 |
| 9 | June 18 | 10,206.62 | 7,659.16 | 17865.78 |
| 10 | July 18 | 10,386.17 | 9,531.92 | 19918.09 |
| 11 | Aug 18 | 14,600.7 | 9,712.85 | 24313.55 |
| 12 | Sept 18 | 14,932.54 | 10,303.66 | 25,236.2 |
| | Total | 134,132.49 | 99,758.71 | 233,891.2 |
| Note: | | | | |

| B. Monthly Records of Certified CPO & PK since the last audit | | | |
|--|---------------------|---------------------------|--------------------------|
| No. | Month - Year | Certified CPO (mt) | Certified PK (mt) |
| 1 | Oct 17 | 2692.56 | 705.32 |
| 2 | Nov 17 | 2811.03 | 771.10 |
| 3 | Dec 17 | 2877.42 | 768.08 |
| 4 | Jan 18 | 2037.55 | 580.03 |
| 5 | Feb 18 | 1726.35 | 451.52 |
| 6 | Mar 18 | 1395.20 | 343.35 |
| 7 | Apr 18 | 1930.15 | 485.13 |
| 8 | May 18 | 2118.10 | 524.23 |
| 9 | June 18 | 1980.89 | 495.69 |
| 10 | July 18 | 2176.08 | 556.39 |
| 11 | Aug 18 | 2815.75 | 704.97 |

RSPO Public Summary Report
Revision 7 (Aug /2018)

| | | | |
|----|---------|-----------|----------|
| 12 | Sept 18 | 3,331.57 | 738.73 |
| 13 | Total | 27,892.65 | 7,124.54 |

| C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any) | | | | |
|--|-------------|----------------------------------|--|---|
| No. | Buyers Name | Palmtrace Trading License Number | Certified CPO Sold (Oct 17 – Sept 18) (mt) | Certified PK Sold (Oct 17 – Sept 18) (mt) |
| 1 | A | TR-5d87e397-6569 | 35.38 | 78.51 |
| 2 | B | TR-d4e56d1a-1793 | 147.69 | 141.1 |
| 3 | B | TR-8b1a983c-f287 | 372.49 | 14.07 |
| 4 | B | TR-81d283ba-97ce | 186.93 | 78.22 |
| 5 | B | TR-19978784-0de5 | 257.17 | 79.87 |
| 6 | B | TR-66614864-ec46 | 76.42 | 76.95 |
| 7 | B | TR-54ad7575-5a74 | 365.58 | 118.24 |
| 8 | C | TR-e872f5a9-3e7d | 361.14 | 103.88 |
| 9 | B | TR-a73b27cb-ad3e | 182.27 | 39.62 |
| 10 | B | TR-e9238654-a40d | 106.32 | 102.92 |
| 11 | C | TR-60ce2be7-841f | 509.72 | 75.24 |
| 12 | C | TR-d331974d-8fb1 | 756.59 | 126.9 |
| 13 | C | TR-9aaf7245-7962 | 880.79 | 34.5 |
| 14 | B | TR-793fe4e9-6ff1 | 689.42 | 80.83 |
| 15 | B | TR-76730056-d290 | 552.65 | 160.42 |
| 16 | C | TR-0c506162-27a1 | 433.27 | 35.59 |
| 17 | C | TR-ae016ef0-3614 | 30.07 | 231.18 |
| 18 | C | TRb1d0b03d-89c4 | 664.09 | 37.34 |
| 19 | D | TR-1be5bae-0d00 | 0 | 78.90 |
| 20 | D | TR-d3208a46-951d | 0 | 41.95 |
| 21 | D | TR-960a0f64-2f1b | 0 | 40.09 |
| | | Total | 6,607.99 | 1,776.32 |
| Note: | | | | |

D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any)

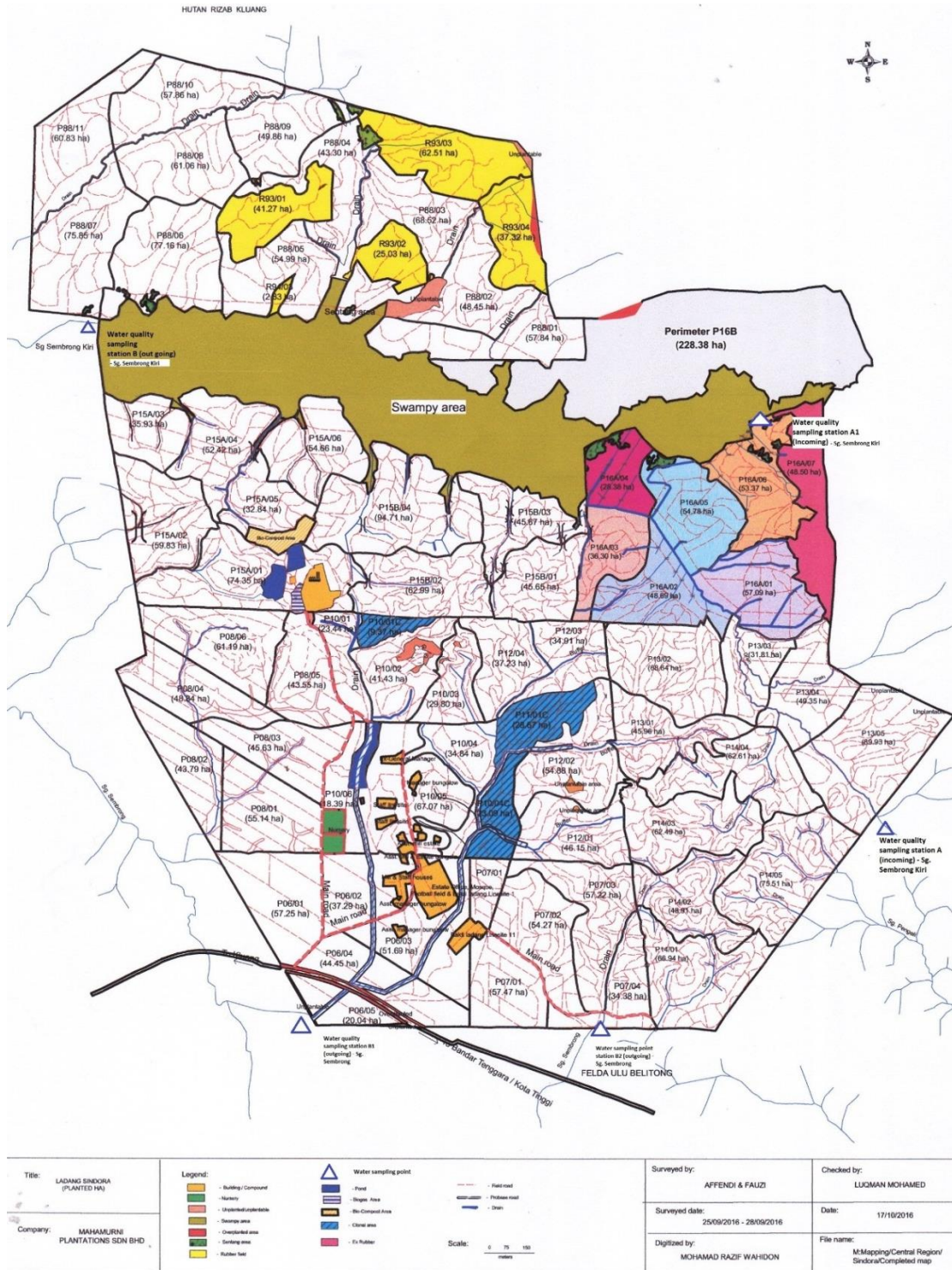
RSPO Public Summary Report
Revision 7 (Aug /2018)

| No. | Buyers Name | Scheme Name | CPO Sold (Oct 17 – Sept 18) (mt) | PK Sold (Oct 17 – Sept 18) (mt) |
|--------------|-------------|-------------|--|---------------------------------------|
| 1 | E | ISCC | 5,641 | Nil |
| | | | | |
| Note: | | | | |

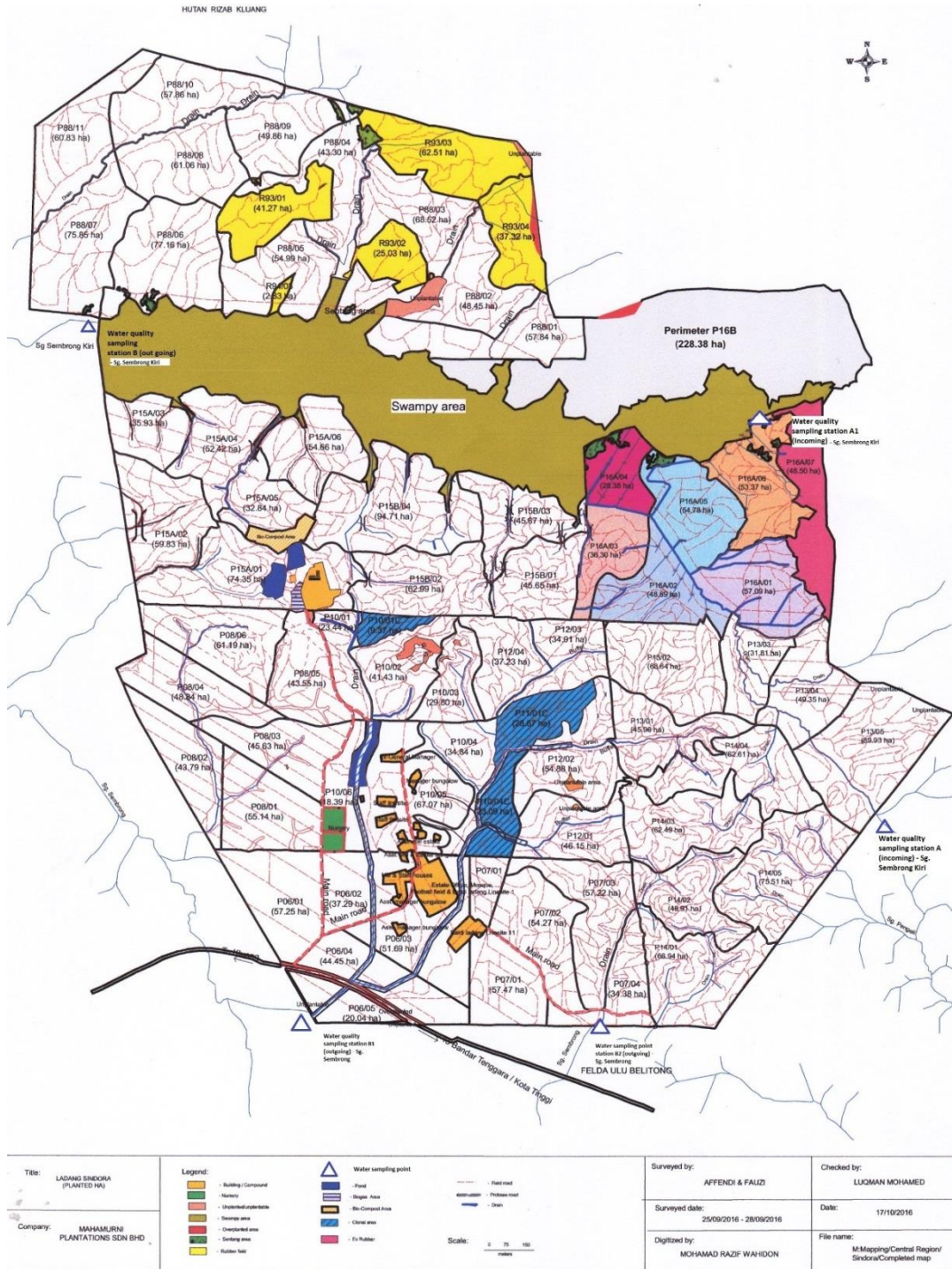
| E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any) | | | | |
|--|-------------|------------------|-----------------|--|
| No. | Buyers Name | CPO Sold (mt) | PK Sold (mt) | |
| 1 | XYZ | 11,250 | 3,500 | |
| | | 11,250 | 3,500 | |
| Note: | | | | |

| F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any) | | | | |
|--|-------------|-------------------------------------|--|--|
| No. | Buyers Name | PalmTrace Trading License Number | RSPO Credits of Certified CPO Sold (mt) | |
| Nil | | | | |
| | | | | |
| Note: | | | | |

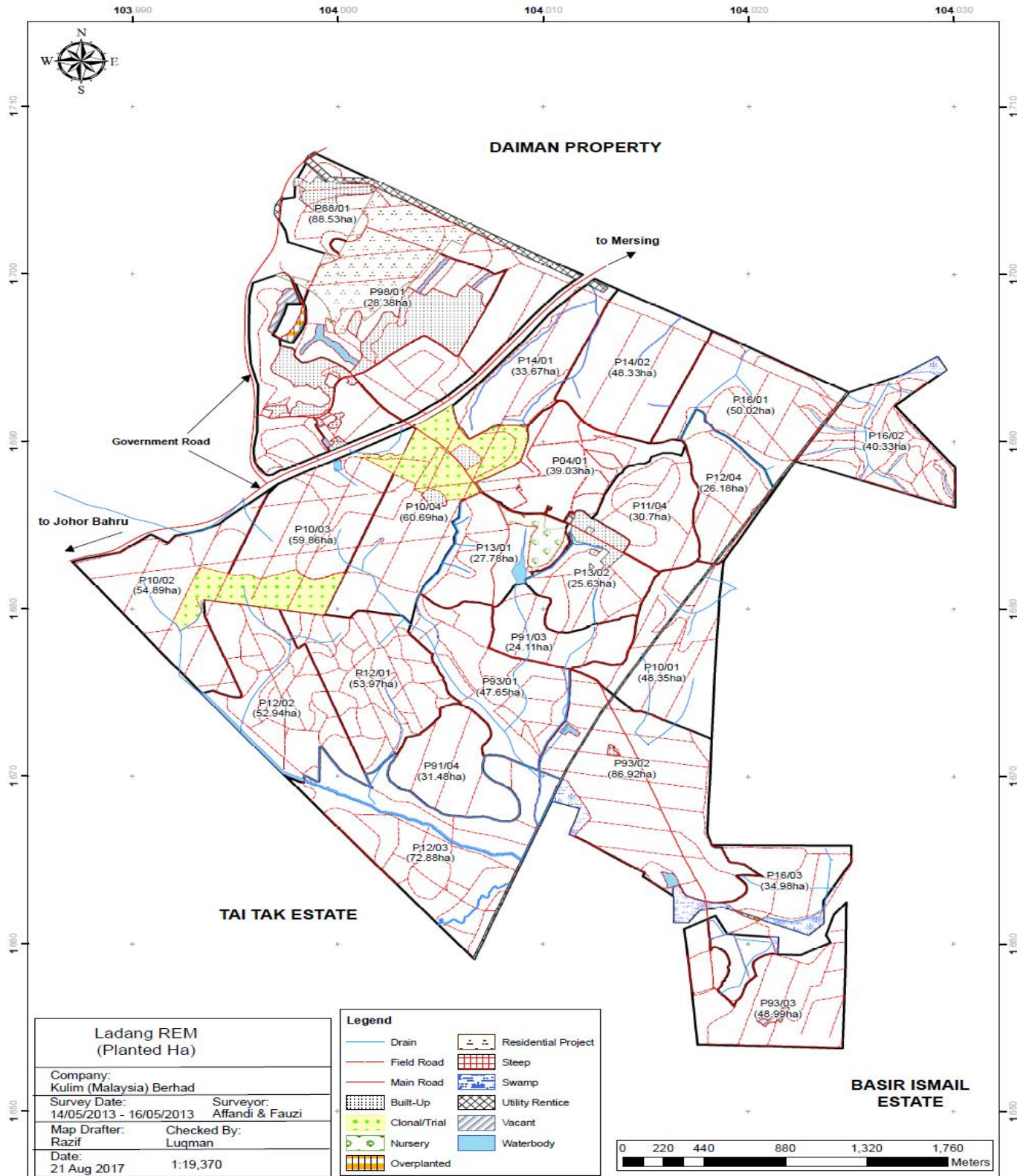
Appendix F: Location Map of Sindora Palm Oil Mill Certification Unit and Supply bases



Appendix G: Sindora Estate Field Map



Appendix I: REM Estate Field Map



Appendix J: List of Smallholder Sampled *(If applicable – scheme/associated/group certification)*

Appendix K: List of Abbreviations

| | |
|------------|--|
| a.i | Active Ingredient |
| BOD | Biochemical Oxygen Demand |
| CB | Certification Bodies |
| CHRA | Chemical Health Risk Assessment |
| COD | Chemical Oxygen Demand |
| CPO | Crude Palm Oil |
| CSPO | Certified Sustainable Palm Oil |
| CSPKO | Certified Sustainable Palm Kernel Oil |
| EFB | Empty Fruit Bunch |
| EHS | Environmental, Health and Safety |
| EIA | Environmental Impact Assessment |
| EMS | Environmental Management System |
| FASSB | Felda Agricultural Services Sdn Bhd |
| 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 |
| IP | Identity Preserved |
| IS - CSPO | Independent Smallholder Certified Sustainable Palm Oil |
| IS – CSPKO | Independent Smallholder Certified Sustainable Palm Kernel Oil |
| IS – CSPKE | Independent Smallholder Certified Sustainable Palm Kernel Expeller |
| ISCC | International Sustainable Carbon Certification |
| LD50 | Lethal Dose for 50 sample |
| MB | Mass Balance |
| 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 |
| RSPO | Roundtable on Sustainable Palm Oil |
| P&C | Principles & Criteria |
| RTE | Rare, Threatened or Endangered species |
| SCCS | Supply Chain Certification Standard |
| SEIA | Social & Environmental Impact Assessment |
| SIA | Social Impact Assessment |
| SOP | Standard Operating Procedure |