

**RSPO PRINCIPLE AND CRITERIA –
1st Annual Surveillance Assessment (ASA1_1)
Public Summary Report**

Carotino/JC Chang Group
Client company Address: Unit 30-01, Level 30, Menara Landmark No. 12, Jalan Ngee Heng, 80000 Johor Bahru Johor, Malaysia
Certification Unit: Asia Palm Oil Mill (Asia Production Unit) KM 45, Off Jalan Lahad Datu 91100 Sandakan Sabah, Malaysia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	2-0029-06-000-00	Membership Approval Date	05/03/2010
Parent Company Name	Carotino/JC Chang Group		
Address	Unit 30-01, Level 30, Menara Landmark, No. 12, Jalan Ngee Heng 80000 Johor Bahru, Johor, Malaysia		
Subsidiary (Certification Unit Name)	Asia Palm Oil Mill (Asia Production Unit)		
Address	KM 45, Off Jalan Lahad Datu- Sandakan 91100 Lahad Datu, Sabah, Malaysia		
Contact Name	Mr Seow Chee Chiang		
Website	www.carotino.com	E-mail	seowcc@jcc.com.my
Telephone	+607 2231633 (Head Office) +6089 567012 (Mill)	Facsimile	+607 224 1546 (Head Office) +6089 563091 (Mill)

2. Certification Information			
Certificate Number	RSPO 651278	Date of First Certification	31/01/2013
		Certificate Start Date	31/01/2018
		Certificate Expiry Date	30/01/2023
Scope of Certification	Palm Oil and Palm Kernel Production from Asia Palm Oil Mill and supply base (Asia Oil Palm Estate Div.2, Melewar Estate 2 and Hwa Li Estate Div.3)		
Applicable Standards	RSPO P&C MY-NI 2014; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module E Mass Balance)		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
50450207 MSPO4	MS2530-4:2013 MSPO Part 4: General Principles for Palm Oil Mills	DQS Certification (M) Sdn Bhd	29/12/2021
50450133 MSPO3	MS2530-3:2013 MSPO Part 3: General Principles for Oil Palm Plantations and Organized Smallholders		29/12/2021
EU-ISCC-Cert-DE101-16450207	ISCC		20/12/2018

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Asia Palm Oil Mill	KM 45 Off Jalan Lahad Datu – Sandakan, 91100 Lahad Datu, Sabah	5° 17' 34.01" N	118° 12' 24.54" E
Asia Oil Palm Estate Div.2	Sungai Tenegang, CL 095317383, Tenegang / Koyah, Kinabatangan, Sabah, Malaysia	5° 18' 16.63" N	118° 11' 56.53" E
Melewar Estate Div.2	Sungai Tenegang, CL 095311201, Tenegang / Koyah, Kinabatangan, Sabah, Malaysia	5° 15' 58.24" N	118° 9' 35.11" E
Hwa Li Estate Div.3	Sungai Tenegang, CL95327138 & CL95327138, Tenegang / Koyah, Kinabatangan, Sabah, Malaysia	5° 20' 41.59" N	118° 18' 19.33" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Asia Oil Palm Estate Div.2	2715.22	0	308.78	3,024.00	90
Melewar Estate Div.2	1770.41	0	252.99	2,023.40	88
Hwa Li Estate Div.3	3,851.56	0	426.04	4,277.60	90
Total	8,337.19	0	992.81	9,330.00	89

6. Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Asia Oil Palm Estate Div.2	996.78	-	22.52	1,279.96	415.96	1,718.44	996.78
Melewar Estate Div.2	-	-	-	1,770.41	-	1,770.41	-
Hwa Li Estate Div.3	-	-	1,414.30	2,437.26	-	3,851.56	-
Total (ha)	996.78	-	1,436.82	5,487.63	415.96	7,340.41	996.78

Note:

7. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (Feb 18 – Jan 19)	Actual (Nov 17 - Oct 18)	Forecast (Feb 19 – Jan 20)

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Asia Oil Palm Estate Div.2	47,337.01	38,740.97	40,146.33
Melewar Estate Div.2	22,224.89	37,179.64	33,144.44
Hwa Li Estate Div.3	86,782.52	65,989.80	81,027.00
Total	156,344.42	141,910.41	154,317.77

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estate	Tonnage / year		
	Estimated (Feb 18 – Jan 19)	Actual (Nov 17 - Oct 18)	Forecast (Feb 19 – Jan 20)
Pahang Oil palm Estate 2	N/A	2,994.31	N/A
Pahang Oil Palm Estate 3		5,303.29	
Total		8,297.60	

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (Jan 18 – Dec 18)	Actual (Nov 17 - Oct 18)	Forecast (Jan 19 – Dec 19)
Smallholders, smallgrowers, etc.	NA	17,303.30	NA
Total	NA	17,303.30	NA

Note:

10. Certified Tonnage			
Mill Capacity: 60 MT/hr	Estimated (Jan 2018 – Dec 2018)	Actual (Nov 2017 - Oct 2018)	Forecast (Jan 2019 – Dec 2019)
	FFB	FFB	FFB
	156,344.42	150,208.01	154,317.77
SCC Model: MB	CPO (OER: 21.71%)	CPO (OER: 19.87%)	CPO (OER: 21.67%)
	33,937.31	29,844.83	33,440.66
	PK (KER: 6.17%)	PK (KER: 4.84%)	PK (KER: 5.92%)
	9,644.58	7,269.01	9,135.61

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11. Actual Sold Volume (CPO) (Nov 2017 - Oct 2018)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	5,794.11	20,818.69	-	2,234.01	28,846.81

12. Actual Sold Volume (PK) (Nov 2017 - Oct 2018)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	6,558.11	-	-	681.21	7,239.32

13. Actual Group certification Claims		
	Credit	Physical Volume (MT)
IS-CSPO		
IS-CSPKO		
IS-CSPKE		

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
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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 surveillance assessment was conducted from 12-16/11/2018. 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 08/02/2019. 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 & Criterias 2013 (MY-NI 2014) and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance.

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.

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

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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 recertification 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 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
Asia Palm Oil Mill	√	√	√	√	√
Asia Oil Palm Estate Div.2	√	√	√	√	√
Melewar Estate Div.2		√	√	√	√
Hwa Li Estate Div.3	√	√	√	√	√

Tentative Date of Next Visit: November 4, 2019 – November 8, 2019

Total No. of Mandays: 13.0 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>
Valence Shem	Team Leader	He holds Bachelor Degree in Industrial Technology, graduated from University of Science Malaysia in 1998 and has 9 years working experience in oil palm plantation industry. He has been in the management system auditing line since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. During this assessment, he assessed on the aspects of legal, environmental & biodiversity, agriculture best practices and the supply chain element. Able to communicate in Bahasa Malaysia and English.
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 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) 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 the aspects of legal, social and stakeholder engagement. Able to communicate in Bahasa Malaysia and English.
Muhamad Naquiddin Mazeli	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 ISO9001 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

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		practices, safety and health, environmental and workers and stakeholders consultation.
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Accompanying Persons:

No.	Name	Role
	Nil	

2.3 Assessment Plan

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

Date	Time	Subjects	VSH	EOC	MNM
Monday 12/11/2018 Asia POM	0830-0900	Opening meeting: <ul style="list-style-type: none"> Opening presentation by audit team leader Confirmation of assessment scope and finalize audit plan (including stakeholder’s consultation) 	✓	✓	✓
	0900-1200	Asia POM 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.	✓	✓	✓
	1000-1200	<u>Stakeholder consultations:</u> Client to invite the relevant stakeholders for both mill and estates which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.		✓	
	1200-1300	Lunch break			
	1300-1630	Asia POM 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.	✓	✓	✓
	1630-1700	Interim closing briefing	✓	✓	✓
Tuesday 13/11/2018 Melewar Estate Div. 2	0900-1200	Melewar Estate Div. 2 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.	✓	✓	✓

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	1200-1300	Lunch break			
	1300-1630	Melewar Estate Div. 2 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.).	✓	✓	✓
	1630-1700	Interim closing briefing	✓	✓	✓
Wednesday 14/11/2018 Asia Oil Palm Estate Div. 2	0900-1200	Asia Oil Palm Estate Div. 2 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.	✓	✓	✓
	1200-1300	Lunch break			
	1300-1630	Asia Oil Palm Estate Div. 2 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.).	✓	✓	✓
	1630-1700	Interim closing briefing	✓	✓	✓
Thursday 15/11/2018 Hwa Li Estate Div. 3	0900-1200	Hwa Li Estate Div. 3 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.	✓	✓	✓
	1200-1300	Lunch break			
	1300-1600	Hwa Li Estate Div. 3 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.).	✓	✓	✓
	1600-1630	Verify any outstanding issues & preparation for closing meeting	✓	✓	✓
	1630-1730	Interim closing briefing	✓	✓	✓
Friday 16/11/2018 Asia POM	0800-1200	Asia POM RSPO Supply Chain Site visit: Incoming of FFB and outgoing of SPO & PK – weighbridge, ramp, storage area, loading bays, etc. Documentation review: RSPO SCC general requirements, internal audit, management review, sales and purchasing	✓	✓	

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		documents, mass balance accounting and other relevant documents and records.			
	1200-1230	Closing meeting	✓	✓	

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- Carotino/JC Chang Group /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	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	No, 4 production units in the group, 3 production units are RSPO certified. Pending Takon Production unit which planned for RSPO certification on 2018 but target cannot be achieved as still pending approval from RSPO on HCV compensation plan.	Yes
Is the time bound plan challenging? <ul style="list-style-type: none"> • Age of plantations. • Location. • POM development • Infrastructure. • Compliance with applicable law. 	No	Yes
Have there been any changes since the last audit? Are they justified?	Yes, 4 production units in the group, 3 production units are RSPO certified. Pending Takon Production unit which planned for RSPO certification on 2018 but target cannot be achieved as still pending approval from RSPO on HCV compensation plan. Last email received from RSPO dated 1 Oct 2018 required for detailed map, photos, budget and justification. JC Chang have appointed WildAsia for improving the plan, communication made between Wildasia and RSPO 11 Oct 2018. Plan to resubmit the revise plan to RSPO again by end Nov 2018.	Yes

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	Pre assessment planned next year March, currently on process of quotation confirmation. Due to above, the time bound plan have shift from 2018 to 2020 for 100% RSPO certified.	
If there have been changes, what circumstances have occurred?	NA	N/A
Have there been any stakeholder comments?	No	Yes
Have there been any newly acquired subsidiaries?	No	Yes
If yes, have the newly acquisitions certified within a three-year timeframe?	NA	N/A
Have there been any isolated lapses in implementation of the plan?	No	Yes
Un-Certified Units or Holdings		
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	No	Yes
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No	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.	Yes. Takon Estate under Takon Production Unit. (Refer Chorology of Event)	Yes
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No labour dispute reported	Yes
Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No	Yes
Did the company conduct an internal audit? If so, has a positive assurance statement	Yes, report of improvement provided for estate's further action	Yes

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been produced?		
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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	

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 was one (1) Major & one (1) Minor nonconformity raised. The Asia 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 its effectiveness and closed accordingly.

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1706395-201811-M1	Clause & Category (Major / Minor)	Indicator 2.1.1 Major
Date Issued	16/11/2018	Due Date	15/2/2019
Closed (Yes / No)	Yes	Date of nonconformity Closure	8/2/2019
Statement of Nonconformity:	The compliance of certain legal requirements was not adequately demonstrated.		
Requirement Reference:	Evidence of compliance with relevant legal requirements shall be available.		
Objective Evidence:	<p><u>Hwa Li Estate Division 3</u> The salary deduction on Buffalo Security (RM35.00/month) made on Worker ID: HL01686 on April, July and October 2018 pay slips are not complying with the Permit Potongan Daripada Gaji Pekerja Seksyen 113(4), Ordinan Buruh (Sabah Bab 67), dated 11.04.2018 until 11.04.2020 No siri: 600-1/2/13/136(11/KBN/2018-087) from JTK.</p> <p><u>Asia POM</u> CHRA for Asia Palm Oil mill had been conducted on 18 Feb 2016. However, it was found that the newly registered chemicals such as MCHM CT 360, CT 201 and CT 105 in chemical register [last updated on 7/8/2018], have yet to be included in the CHRA report by the CHRA assessor as per USECHH Regulation 2000.</p>		

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Corrections:	<p><u>Hwa Li Estate Division 3</u></p> <p>1. Stop on Buffalo Security Deduction effective on November 2018. No deductions will be made by the management from the wages of employee otherwise stated in latest deduction permit obtained from Jabatan Tenaga Kerja, Sabah.</p> <p>2. Notice of "<i>Pemotongan Sekuriti Kerbau kepada semua penyabit akan diberhentikan sementara sehingga pemotongan Sekuriti Kerbau mendapat kelulusan daripada Jabatan Tenaga Kerja, Sabah</i>" for worker attention.</p> <p>3. Pay back arrears payment in lieu will be perform immediately to the workers who are affected with the unauthorized deduction.</p> <p>4. Reapplication on deduction permit will be issued to Jabatan Tenaga Kerja to include all the deduction practiced by the estate and all deductions will continue to be performed if approved by the authority. Follow up action will be strictly performed to monitor the application progress by Ms. Adrianti binti Nahrud.</p> <p>5. Deduction description in the system will be revised and new deduction code will be issued to ensure the narration is in accordance to the detail as per mentioned in deduction permit approved by <i>Jabatan Tenaga Kerja</i>.</p> <p><u>Asia POM</u> Engage registered assessor to conduct chemical hazard risk assessment for all chemical currently used by the management.</p>
Root Cause Analysis:	<p><u>Hwa Li Estate Division 3</u></p> <p>Estate has Person in-charge on law changes and tracking but she not performed her duty as per Mechanism Requirements under Doc reference: SOP On Mechanism to Trace Changes in Legal Requirements [E005-07/2017 dated on 06/01/2017], where she did not review the new term and condition of the latest permit and discuss with the management on the changes for the effectiveness of implementation, therefore leads to non-compliance to the requirement stated in the permit of deduction according to Permit Pemotongan Daripada Gaji Pekerja Seksyen 113(4), Ordinan Buruh (Sabah Bab 67), dated 11/4/2018 until 11/4/2020, no siri: 600-1/2/13/136(11/KBN/2018-087) from Jabatan Tenaga Kerja, Sabah.</p> <p><u>Asia POM</u> Mill has Person In Charge on Law Changes and Tracking but he not performed his duty as per Mechanism Requirements under Doc reference: SOP On Mechanism to Trace Changes in Legal Requirements [E005-07/2017 dated on 06/01/2017] and SOP on Chemical Purchase, Storage, Handling & Disposal of Used Chemical and Container [H005-02/2015 dated on 03/08/2015], where he did not notify the management to conduct CHRA for any new chemical required to be used, therefore leads to the non-compliance to USECHH Regulation 2000.</p>
Corrective Actions:	<p><u>Hwa Li Estate Division 3</u></p> <p>1. To retrain person in-charge on law changes and tracking as per requirements of SOP On Mechanism to Trace Changes in Legal Requirements [E005-07/2017 dated on 06/01/2017] with objective of the training is to ensure, she will review the term and condition of the latest approval permit and call the management for a discussion to identify the best implementation on the changes if any, to ensure the compliance according to the approval obtain.</p>

	<p>2. All the approval license and permit will be reviewed by Ms. Adrianti binti Nahrud to ensure the compliance are according to the latest approval. If there is any variation from the previous approval, she will be responsible to communicate the detail of variation to the estate manager for his acknowledgment and further action.</p> <p><u>Asia POM</u></p> <p>1. To retrain Person in Charge on Law Changes and Tracking as per requirements of E005-07/2017 dated on 06/01/2017 with objective of the training is to ensure he will review and notify the management on the requirement of new law or law changes received from HQ and call the management for discussion to ensure the law compliance are implemented accordingly.</p> <p>2. To retrain the appointed personnel who is responsible to perform his/her duty according to the requirement of H005-02/2015 dated on 03/08/2015, so that in future, his/her will notify the management to conduct chemical hazard risk assessment for the new chemical required to be used.</p> <p>3. Purchasing of chemical will be performed as per H005-02/2015 requirement. Personnel who involved with the chemical purchases are responsible to inform the mill manager to engage with CHRA assessor if there is any requirement to use any new chemical.</p> <p>4. Updating chemical hazard to health register as per actual chemical used in the mill from time to time will be performed by Mr. Jaini and if new chemical is present, he will responsible to inform the mill manager on the requirement to engage authorized assessor for conducting CHRA for the new chemical.</p> <p>5. All chemical inventory will be monitored by using a chemical checklist which the duty will be perform by Mr. Jaini.</p>
<p>Assessment Conclusion:</p>	<p>An on-site verification was performed to verify the CAP evidence on 8/2/2019. Among the evidence verified on-site was:</p> <p><u>Hwa Li Estate Division 3</u></p> <ul style="list-style-type: none"> - Notice of buffalo security deduction to be stopped, dated 16/11/2018 - Arrears payment records which shows the amount of payment returned to the affected workers. It was also signed by the workers. - Application letter for deducting buffalo security to Labour Office [ref.:HLE3/PC/2018/39-01/yan, dated 19/11/2018]. The letter was received by the labour office on 23/11/2018. - Training and evaluation records, dated 19/11/2018, for the relevant person in charge on "mechanism to trace changes in legal requirement" <p><u>Asia POM:</u></p> <ul style="list-style-type: none"> - Purchase order to assign qualified CHRA to conduct reassessment for the newly registered chemicals - Training and evaluation records, dated 24/11/2018, for the relevant person in charge on "SOP on chemical purchase, storage, handling and disposal of used chemicals and containers" <p>Based on the visit, the implementation of the CAP was effective and sufficient to close the NCR.</p>

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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1706395-201811-N1	Clause & Category (Major / Minor)	Indicator 2.1.3 Minor
Date Issued	16/11/2018	Due Date	Next annual surveillance assessment
Closed (Yes / No)	Yes	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	A sampled worker was found to be paid below the Malaysian's Minimum Wage Order 2016.		
Requirement Reference:	A mechanism for ensuring compliance shall be implemented.		
Objective Evidence:	At Hwa Li Estate, based on verification of pay slips, it was found that a worker (ID: HE300901) had have salaries below the minimum wage i.e. RM920/month or RM 35.38/day according to Minimum Wage Order 2016, for the month of April, July and October 2018.		
Corrections:	Established a written procedure of mechanism to monitor the compliance to Minimum Wages order and communicated to all level of workforce for effective implementation.		
Root Cause Analysis:	Worker productivity was monitored and reminder letter was issued to the workers who did not achieve minimum wages of the month. However, the mechanism was not effective to ensure all workers comply with the minimum wages order and management fail to show concrete evidences for the mechanism (eg: provide/offer other works to loose fruit pickers to top up their wages).		
Corrective Actions:	<ol style="list-style-type: none"> 1. Written procedure of mechanism for monitoring worker's minimum wages and communicated to all level of workforce for effective implementation 2. Assistant manager will responsible to monitor the worker productivity in daily basis based on worker check roll book. 3. Minimum wages analysis will be performed by Ms. Adrianti binti Nahrud in monthly basis and she will responsible to highlight to the manager on the analysis result for his further instruction. 4. Motivation section will be carried out to the worker who fail to maintain their productivity to identify the actual root course of the low performance. Remediation action will be performed upon agreed by worker and management during the section. 		
Assessment Conclusion:	The CAP was accepted. The effectiveness of the implementation of CAP shall be verified in the next assessment.		

Opportunity for Improvements	
OFI #	Description
OFI 1	<p>1706395-201811-I1</p> <p>Details :</p> <ul style="list-style-type: none"> • The implementation of Environmental Compliance Report (ECR) for the approved replanting Proposal for Mitigation Measure (PMM) could be further improve by conducting it in timely manner.

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	<ul style="list-style-type: none"> The information in the MPOB License of Hwa Li Estate Div. 3 can be further improved by ensuring the registered estate's area is reflected from its land title.
OFI 2	<p>1706395-201811-I2</p> <p>Details: The management of leachate at the shredded EFB stock pile can be further improved by ensuring it does not flow into the nearby monsoon drain.</p>
OFI 3	<p>1706395-201811-I3</p> <p>Details: The reporting of GHG emission in the RSPO Palm GHG Calculator can be further improved by ensuring the accuracy of the input data.</p>
OFI 4	<p>1706395-201811-I4</p> <p>Details: The description of deduction in the workers' payslips can be further improved by making it properly describe what is exactly being deducted. For e.g. deduction for "Tanggungan Passport" was described as "Tabungan".</p>

Positive Findings	
PF #	Description
PF 1	

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-Conformity			
NCR Ref #	1554102-201709-M1	Clause & Category (Major / Minor)	Indicator 5.3.3 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	08/01/2018
Statement of Nonconformity:	The plan to avoid or reduce pollution not implemented effectively		
Requirement Reference:	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented		
Objective Evidence:	Asia POM 1. The oil trap at the workshop was not maintained. During the mill visit, found traces of oil already escaped out in to the monsoon drain. 2. There was no oil trap for the drain surrounding the diesel storage tank. This indicator was escalated into major nonconformity since minor nonconformity has been raised in previous year audit on similar issue.		
Corrective Actions:	Pollution and mitigation plan was amended to capture the aspect and impact of oil leakage from skid tank and other operation area in mill compound. The plan will review accordingly to ensure the effectiveness of implementation. - Person in-charge: Mr. Faisal Awang Amit - Time Frame: As per date review stipulated in Plan and Mitigation Plan		
Assessment Conclusion:	<u>Verification in this assessment:</u> - During the site visit at the mill workshop, there was no more spillage of oil observed. The oil trap has also been well maintained		

	<ul style="list-style-type: none"> - Based on the visit at the mill’s diesel skid tank, it was found that the oil trap was well maintained and no trace of oil observed. - The environmental aspect and impact has also been updated to establish and maintain the mitigation measure for oil spillage at the skid tank. <p>Thus, the major NC is remain closed.</p>
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Non-Conformity			
NCR Ref #	1554102-201709-N1	Clause & Category (Major / Minor)	Indicator 4.1.3 Minor
Closed (Yes / No)	Yes	Date of nonconformity Closure	16/11/2018
Statement of Nonconformity:	Monitoring equipment was not effectively maintained		
Requirement Reference:	Records of monitoring and any actions taken shall be maintained and available, as appropriate		
Objective Evidence:	Asia POM Calibration was not conducted for the stack monitoring equipment (CEM). Due for calibration on April 2017		
Corrective Actions:	<ol style="list-style-type: none"> 1. Responsible person to monitoring the calibration of CEMS will be appointed to ensure the device well function to capture data of emitted smoke and transmit the data to DOE. 2. All the expiry date will be list down in on the information board for reminder and action to engage the consultation for the calibration will be 3 month prior the date of calibration expired. 		
Assessment Conclusion:	<p><u>Verification in this assessment:</u> A copy of the contractor’s (S.T. Services Sdn Bhd) work report No. 01533 dated 27/9/2018 was made available for verification. The description of work is to check and calibrate smoke density meter for Boiler No. 1. The appointed responsible person to monitor the calibration of CEMS is Mr. Ang (new Mill Manager) who had replaced Mr. Chong Chung Wai since July 2018.</p> <p>A list of expiry date information has been written on a notice board and monitored by Mr. Jaini Masri. Conclusion: Based on the evidence, the implementation of corrective action was found to be effective to close the minor NCR.</p>		

Observation			
Obs Ref #	1554102-201709-01	Clause & Category	Indicator 6.5.3 Observation
Details	The sampling for analysis by third party lab of drinking water supplies from own water treatment plant to be cross-checked further for endorsement by the Health Department.		
Verification on this assessment	The third party lab, namely Dynakey Laboratories Sdn Bhd is appointed and accredited by standards Malaysia MS ISO/IEC 17025 TESTING SAMM NO. 576. During the 93 rd MECM Meeting Minutes dated 05.07.2018 attended by 21 people, the Department of Health is contacted by the management on the water sampling activities request and they have mentioned that Estate Management is not		

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	applicable with Worker’s Minimum Housing and Acts 1990. The management anyway has requested to the Department of Health to conduct the water sampling to all Asia units however the Department of Health only at Hwa Li Estate Division 3 and Melewar 2 Estate, therefore this issue is closed.
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Opportunity for Improvement	
OFI#	Description
OFI 1	

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1554102-201709-M1	Major	5.3.3	09/11/2017	Closed on 08/01/2018
1554102-201709-N1	Minor	4.1.3	09/11/2017	Closed out on 16/11/2018
1706395-201811-M1	Major	2.1.1	16/11/2018	Closed out on 08/02/2019
1706395-201811-N1	Minor	2.1.2	16/11/2018	“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 Asia 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.

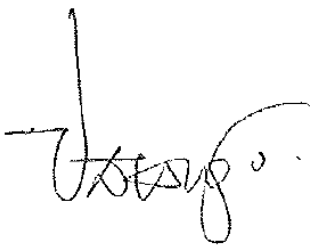

List of Stakeholders Contacted	
<p>Internal Stakeholders</p> <p>Mill and estates workers</p> <p>Workers’ Representative</p> <p>Gender Committee Representative</p>	<p>Union/Contractors/Local Communities</p> <p>Neighbouring plantations (Lam Soon Plantation & KJS Plantation)</p> <p>Sundry shop in the estate</p>

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Humana	
Government Departments	NGO
Nil	Nil

IS #	Description
1	<p>Feedbacks: <u>Humana School Teacher</u> Humana teacher shared that the syllabus learn in primary school is as per Malaysian syllabus while for secondary school at CLC in Pahang Estate will be based in Indonesian school. After that, the children worker will have to continue their study at Indonesia University or get the work permit with the management if they want to work at the estate/mill.</p>
	<p>Management Responses: Will continue to give support to the Humana institution.</p>
	<p>Audit Team Findings: Verified the CSR record for the Humana fund in monthly basis and no other issue.</p>
2	<p>Feedbacks: <u>Gender Committee</u> Meeting has been held yearly and recorded. Activity also been conducted throughout the year with management supports. So far, no sexual harassment or domestic violence cases reported in Asia Complex.</p>
	<p>Management Responses: Noted and will continue the good practices.</p>
	<p>Audit Team Findings: No other issue.</p>
3	<p>Feedbacks: <u>Worker’s Representative (Indonesian & Philippine)</u> No discrimination and conflicts occurred in the Asia Complex. Salary and deductions made in timely manner and with the worker’s consent. Training for safety and operation been given accordingly.</p>
	<p>Management Responses: Noted and will continue the good practices.</p>
	<p>Audit Team Findings: No other issue.</p>
4	<p>Feedbacks: <u>Neighbour Estate (Lam Soon Plantation & KJS Plantation)</u> So far the management has a good relationship with neighboring plantation. KJS Plantation has requested to send their worker’s children to school at Humana in Asia Complexes and Management agreed. No other disputes occurred.</p>
	<p>Management Responses: Management will continue to maintain a good relationship with the neighbouring plantations.</p>
	<p>Audit Team Findings: No other issue.</p>

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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 Asia 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 Asia Oil Mill is continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Valence Shem	Name: Seow Chee Chiang
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: Carotino / J.C. Chang Group
Title: Lead Auditor	Title: Senior Manager
Signature: 	Signature: <i>(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.)</i> 
Date: 5/4/2019	Date: 09/04/2019

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 -	Annual inspection by DOSH was conducted on 21.5.18 and recorded in Asia POM (H/K/977) FACTORY & MACHINERY LOG BOOK. Reports and recommendation was made by the JKPP Officer such as to install toe beard/toe guard and handrail at separator cleaning platform area. Based on Guidelines on Guidelines on Mechanism for Information Requests by Stakeholders (Doc. Ref. No. E/006-07/2017) dated 11/10/2017, SOP on Mechanisms for Communication and Consultation; Doc. Ref. No.: E/004-07/2015' Doc. Date: 8/9/2015. Stakeholder meeting was conducted on 26/9/2018 at Melewar Oil Palm Estate Div. 2, 10.09.2018 & 02.02.2018 (Asia POM Meeting Room), 17.04.2018 (Asia Oil Palm Estate 2). All representatives from each Asia Production Unit including Asia Palm Oil Mill, Asia 2 Estate, Melewar Div. 2 Estate, Hwa Li 3 Estate, Lam Soon Estate and others attended the meeting with local stakeholders

Criterion / Indicator		Assessment Findings	Compliance
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	<p>Asia Production Unit (APU) has established the Guideline on Mechanism for Information Requests by Stakeholders to deal with stakeholder's request for information on environment, social and legal issues.</p> <p>Asia POM & estates maintains 'Stakeholder Requests Register' record all requests made and actions taken to address the request. A file containing the original request documents (letter & form) and summary register is maintained.</p> <p>Requests by stakeholders are made through JCC meetings, verbally, written by using letter or Complaint/Suggestion/Request Form.</p> <p>Stakeholder Request Record Book is utilized to record complaint made by any of the stakeholders & action taken following complaints made by the stakeholders.</p> <p>List of stakeholders: - Statutory Bodies - Internal Stakeholder - Local Communities - NGO - FFB suppliers - Neighbouring Properties - Sister Estate & Mills - Suppliers of Material & Services</p> <p>Record of request and complaints clearly stated in the RSPO 1.1: Record of Request/ Responses</p>	Complied
<p>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.</p>			

Criterion / Indicator		Assessment Findings	Compliance
1.2.1	Publicly available documents shall include, but are not necessary limited to: <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). - Major compliance –	There was no restriction noted as to the documents made available to the public except those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. JC Chang Group continued to use the internet for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans was made available at all operating units. Among the documents that were made available for viewing are: <ul style="list-style-type: none"> • Good Agricultural Practices • Environmental and Social Improvement Plan • SOP on Mechanism for Communication and • Consultation • SOP For Identifying Legal And Customary Rights • And Identifying People Entitled To Compensation • SOP on mechanism for complaints and grievances 	Complied
Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.			

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Criterion / Indicator		Assessment Findings	Compliance
1.3.1	<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>Sighted the Corruption Prevention Policy that declared JC Chang decision to communicate the way it prevents corruption. This policy applies to all entities within the company included contracted third parties and consultants in relation to their work with/for the group. Policy was signed by Mill Director on 4/9/2015. Policy available in English and Malay language.</p> <p>For Asia POM, the training has been conducted on 04.07.2018 to 125 workers by Technical Assistant (Mohd Faisal Awang Amit) in Melewar Estate Division 2 while in Asia Estate Division 2, the policy has been brief individually whenever new worker recruited. Sample seen for passport no: AU 293043 on 01.10.2018. In Hwa Li Estate Division 3, the briefing of the policy has been conducted in phases. The latest briefing has been conducted on 18.10.2018, 28.10.2018 and 18.01.2018 by Assistant Manager, Mr Tony Tiwon.</p>	Complied
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.			

<p>2.1.1</p>	<p>Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p>	<p>Asia production Unit continued to demonstrate its commitment to comply all the relevant legal requirements. Among the evidence of compliance verified were:</p> <p><u>Asia POM</u></p> <ul style="list-style-type: none"> - CePPOME/184538, validity 15/8/2018 – 15/8/2019 – Mr. Cheong Kai Yuan - MPOB License, 500143104000, 1/12/2017 to 30/11/2018, Asia Oil Palm Sdn Bhd - CePSWAM – Mr. Sardesh to be sent expected in the immediate next schedule by DOE - Diesel permit, # S 014335, 24,000 lt, 18/4/2018 to 9/4/2019 - License (Pursuant to Section 9 of the Electricity Supply Act 1990), #LP 12/1/9/1819, dated 12/8/2016 – valid for 15 years - For LEV(local Exhaust Ventilation) inspection report (EC/0618/9831) is done by annually, conduct by Mr Daneshkumar Rajendran (HQ/15/JHII/00/206) Chemclass Sdn Bhd dated 21 may 2018. For monthly inspection done latest on 2 Nov 2018, this include to check light function, ducting, picture suction etc. by Hajjiah Lahar - Audiometric test have been done on 7 September 2018, 27 person have been send for test. The test is conduct by Dr Mohamad Fikri Bin Zanal Abidin (HQ/16/DOC/00/557) from Mabello Group of Clinics valid until 20 December 2019. - Dosh Log book is available latest dated 21 May 2018 visit by Ruslan Bin Pangkit, SB PMT 1238 already been renewed valid until 20 August 2019. <p><u>Melewar Estate 2 (MD2)</u></p> <ul style="list-style-type: none"> - Lesen bagi Pemasangan Persendirian (Seksyen 9, Akta Bekalan Elektrik 1990), #2018/02251, validity 8/8/2018 to 7/8/2019. <i>Laporan Penjanaan Bulanan</i> (Monthly Generation Report) were 	<p>Major non-conformance</p>
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		<p>submitted to the Energy Commission without fail where latest submission was in Oct 2018</p> <ul style="list-style-type: none"> - Genset DOE's written notification – in the midst of application. Currently, a contractor has been awarded to carry out the application process - MPOB License # 502932802000, Licensee: Melewar Properties Sdn Bhd, Melewar Estate Div 2, validity 1/10/2018 to 30/9/2019, 2,023.4 Ha (ref.: land title # CL 095311201) <p><u>Asia Oil Palm Estate 2 (AOP2)</u></p> <ul style="list-style-type: none"> - MPOB License # 502330302000, Licensee: Asia Oil Palm Sdn Bhd, validity 1/7/2018 to 30/6/2019, 3,024 Ha (ref.: land title # CL 095317383) - Diesel permit, # S 011826, 18,000 lt, 18/10/2018 to 17/10/2019 - CHRA dated 10 Oct 2015 by CHRA industrial Hygiene Service Sdn Bhd. Pn Zainatul Hazreen binti Abdul Hamid (JKKP HIE 127/171-2(319)) <p><u>Hwa Li Estate 3 (HL3)</u></p> <ul style="list-style-type: none"> - MPOB License # 503266302000, Licensee: Syarikat Keratong Sdn Bhd, validity 1/12/2017 to 30/11/2018, 4,047 Ha (ref.: land title # CL 095324502). However, land title No. CL095327138 was not reflected the MPOB License (OFI) - Diesel permit, # S 002244, 40,000 lt, validity 27/12/2017 to 26/12/2018 - Genset DOE's written notification – same case with MD2 - <i>Lesen bagi Pemasangan Persendirian (Seksyen 9, Akta Bekalan Elektrik 1990), #2018/01211 & 2018/01212, validity 15/7/2018 to 14/7/2019 and 25/5/2018 to 24/5/2019. Laporan Penjanaan Bulanan (Monthly Generation Report) were submitted to EC without fail – latest submission Sep 2018</i> 	
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Criterion / Indicator	Assessment Findings	Compliance
	<p>- Hospital Assistant (Suzy) in Hwa Li certificate from <i>Lembaga Pendaftaran Pembantu</i> Hospital Estate is valid for 2 years start from dated 29 July 2017.</p> <p>However, some lapses were also found as follows: At Hwa Li Estate Division 3, the salary deduction on Buffalo Security (RM35/month) made on Worker ID: HL01686 on April, July and October 2018 pay slips are not complying with the <i>Permit Potongan Daripada Gaji Pekerja Seksyen 113(4), Ordinan Buruh (Sabah Bab 67)</i>, dated 11.04.2018 until 11.04.2020 No siri: 600-1/2/13/136(11/KBN/2018-087) from JTK.</p> <p>At Asia POM, CHRA for Asia Palm Oil mill had been conducted on 18 Feb 2016. However, it was found that the newly registered chemicals such as MCHEM CT 360, CT 201 and CT 105 in chemical register [last updated on 7/8/2018], have yet to be included in the CHRA report by the CHRA assessor as per USECHH Regulation 2000.</p> <p>Therefore a major non-conformity report was assigned.</p>	

Criterion / Indicator		Assessment Findings	Compliance
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	A list and copies of legal documents and international treaties and agreements were available for verification. Changes in law was normally tracked through www.lawnet.com.my. The person responsible for monitoring compliance to laws and regulations is formally identified in the guidelines. The Unit maintain copy of relevant laws and legislation relevant to palm oil mill and the plantation operation as per listed in the standard. Asia production Unit continued to demonstrate its commitment to comply all the relevant legal requirements. Among the evidence of compliance verified were:	Complied
2.1.3	A mechanism for ensuring compliance shall be implemented. - Minor compliance -	A list and copies of legal documents and international treaties and agreements were available for verification. Changes in law was normally tracked through www.lawnet.com.my. The person responsible for monitoring compliance to laws and regulations is formally identified in the guidelines. The Unit maintain copy of relevant laws and legislation relevant to palm oil mill and the plantation operation as per listed in the standard. Nonetheless, at Hwa Li Estate Division 3, it was found that Worker ID: HE300901 was having the salary below minimum wage of RM920/month or RM 35.50/day for the month of April, July and October 2018 pay slips which is not comply with the Minimum Wage Order 2016. Thus, a minor nonconformity report was assigned due to this lapse.	Minor non-conformance

Criterion / Indicator		Assessment Findings	Compliance
2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance -	System for tracking the changes in the law is addressed in SOP on Mechanism to Trace Changes in Legal Requirements" [doc. No.: E/005-08/2018, dated 6/2/2018. Among the mechanisms spelt out in the SOP were: - Head office subscribes to the Malaysia Gazette on-Line (www.lawnet.com.my) – clause 1 - Information from MPOA, MPOB, and other organizations to HQ – clause 7 - Circular/letter received from government agencies by the estate/mill managers	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.			
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 -	All the visited estates were able to demonstrate their rights to use the land by possessing their land titles. Some information about the verified land titles: ME2: 2,023.4 Ha (ref.: land title # CL 095311201) AOP2: 3,024 Ha (ref.: land title # CL 095317383) HL3: 4,047 Ha (ref.: land title # CL 095317383) 230.6 Ha (ref.: land title # CL095327138)	Complied
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	Legal boundaries were clearly demarcated with a few methods such as planting teak trees along the boundary and using 2"x2" yellow painted wooden pegs. This was confirmed through site visit at the boundaries between the visited estates and some of the other oil palm companies.	Complied

Criterion / Indicator	Assessment Findings	Compliance
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 -	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	Complied
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	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	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 -	Complied

Criterion / Indicator	Assessment Findings	Compliance
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: 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; 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; 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. - Minor compliance -	There is no land dispute in the Asia POM complex at the time of audit. The land belongs to JC Chang and land ownership documents verified. Company has the FPIC Procedure in Doc Ref No: E/004-07/2015 dated 09.09.2015 as well as referring to Resolution and Compensation Procedure Ref. E/002-02/2012 dated 11.09.12.	Complied
2.3.3 All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	There is no land dispute in the Asia POM complex at the time of audit. The land belongs to JC Chang and land ownership documents verified.	Complied
2.3.4 Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	There is no land dispute in the Asia POM complex at the time of audit. The land belongs to JC Chang and land ownership documents verified.	Complied
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.		

Criterion / Indicator		Assessment Findings	Compliance																													
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 -	<p>Asia Production Unit continued its commitment to long term sustainability and improvements through a capital expenditure programme. Asia Palm Oil Mill and supply bases have made progress towards achieving their performance production targets for the current financial year. OPEX projected for 3 years until 2021.</p> <p><u>Mill</u> Annual budget was available for 3 years projection i.e. 19/20, 20/21 & 21/22, which includes plant processing, machinery upkeep, general overhead and general charges. Also considered the OER, KER, production cost, forecast price. Baseline production cost is RM570/mt CPO.</p> <p><u>Estates</u> Annual budget was available for 3 years projection i.e. 19/20, 20/21 & 21/22, which includes the expenditures of mature upkeep and cultivation, mature harvesting collection and FFB production forecast. Baseline production cost is between RM200 to RM250/mt FFB.</p>	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 -	<p>All of the visited estates have prepared the replanting programme with minimum of 5 years projection. Below are the details of the programme in Ha unit:</p> <table border="1"> <thead> <tr> <th rowspan="2">Estates</th> <th colspan="5">Ha/Year</th> </tr> <tr> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> </tr> </thead> <tbody> <tr> <td>ME2</td> <td>223</td> <td>206</td> <td>218</td> <td>155</td> <td>237</td> </tr> <tr> <td>AOP2</td> <td>219</td> <td>197</td> <td>269</td> <td>209</td> <td>196</td> </tr> <tr> <td>HL3</td> <td>322</td> <td>281</td> <td>314</td> <td>270</td> <td>325</td> </tr> </tbody> </table>	Estates	Ha/Year					2019	2020	2021	2022	2023	ME2	223	206	218	155	237	AOP2	219	197	269	209	196	HL3	322	281	314	270	325	Complied
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<p>Principle 4: Use of appropriate best practices by growers and millers</p>																																

Criterion / Indicator	Assessment Findings	Compliance
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>Estates and Oil Mill have maintained and revised if required, the Documented Standard Operating Procedures file that contains both the safe operating procedures and the procedures to implement the various major field operations. For example, The Standard Operation Procedure (SOP) for Asia POM contains the procedures for all activities as below:</p> <ol style="list-style-type: none"> 1) Reception Station (Q/018-04/2014) 2) Grading Station (Q/019-04/2017) 3) Loading Ram Station (Q/028-04/2014) 4) Sterilizer Station (Q/039-01/2015) 5) Threshing Station (Q/020-05/2018) 6) Press Station (Q/021-04/2016) 7) Clarification Station (Q/022-04/2018) 8) Depericarper Station (Q/023-04/2014) 9) Nut & Kernel Station (Q/024-04/2018) 10) Boiler Station (Q/025-04/2014) 11) Engine Room Station (Q/026-04/2014) 12) Water Treatment Plant (Q/027-04/2014) 13) Turner Station (compost plantr) (Q/060-01/2014) 14) Digestion Station (Biogas Plant) (BG/SOP/AP-V1-15)) <p>Estates and Oil Mill have maintained and revised if required, the Documented Standard Operating Procedures file that contains both the safe operating procedures and the procedures to implement the various major field operations. For example, among others, the Estate SOP Manual has procedures category for the following operations:</p> <ol style="list-style-type: none"> i) Road and Terrace construction for New Planting and Replanting (A/005-01/2008) ii) Nursery Establishment and Practices (A/006-01/2008) iii) Field planting (A/007-02/2011) iv) Pruning and Frond stacking (B/001-01/2008) 	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	v) Weeding Regime & Practices ((B/004-01/2008) vi) Riparian Buffer Zone (C/001-02/2009) vii) Justifications for Pesticide Usage under IPM (Insecticide, Fungicide & Rodenticide) (B/008-14/2016) viii) Justifications for Pesticide Usage under IPM (Weedicides) (B/009-10/2015) ix) FFB Evacuation with MTG (D/003-01/2008) x) FFB Harvesting and Evacuation (D/004-04/2015) xi) Fertiliser receipts, management and application (H/001-03/2016) xii) Integrated Pest & Disease Management (L/001-05/2014) xiii) Rat control and baiting (L/002-07/2016)	

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.1.2</p>	<p>A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -</p> <p>SOP Monitoring (P4) In Asia POM, sampling on Station from Empty fruit bunch Operator until AE- Gate Keeper. Latest report weekly conduct by Wahid Suddin on 3 Nov 2018 and 10 November 2018. Latest record 14 Nov 2018 and 15 Nov 2018 the Pass record of checking system is updated and verified security guard, assistant manager, WB clerk, lab assistant for before and after despatch Lahad Datu Edible Oils Sdn Bhd. This followed as per referred under Doc Ref No CCP/01-05/2018-AOM until CCP/09-01/2018-AOM dated 15 June 2018 for Supply chain Critical Control Point (CCP) monitoring mechanism.</p> <p>Company has mechanism to check the implementation of procedure through routine inspection by Mill Director Visit and 3rd party mill inspector which scheduled for twice a year. Mill and Plantation Director and 3rd party mill inspector report were verified. The Internal RSPO visit was conducted by Sustainability Department. The inspection/internal audit was covered all activities related to palm oil mill and oil palm agriculture practices.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance										
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 actions is been maintained and available as per sampling below:- From the SOP station Press (Q/021-04/2016) dated 7 Sept 2016, the monitoring is done dated on 25 Sept 2018 as per record below detail:-</p> <table border="1"> <thead> <tr> <th>Flask</th> <th>FTS</th> <th>Sample</th> <th>Reading</th> <th>FFA</th> </tr> </thead> <tbody> <tr> <td>127.93</td> <td>131.69</td> <td>3.76</td> <td>5.4</td> <td>3.67</td> </tr> </tbody> </table> <p>Medical surveillance for Mill conduct 20 Oct 2018 and sent total workers 31 Workers. The workers is fit to works. The latest result for Medical surveillance, sampling on Rosli Bin Sadik (lab no 18-1782107) from the result for checking the 2,5 – Hexanedione he is fit to work. For LEV(local Exhaust Ventilation) inspection report (EC/0618/9831) is done by annualy, conduct by Mr Daneshkumar Rajendran (HQ/15/JHII/00/206) from Chemclass Sdn Bhd dated 21 may 2018. For monthly inspection done latest on 2 Nov 2018, this include to check light function, ducting, picture suction etc. by Hajjiah Lahar(Lab Attendent).</p> <p>Audiometric test have been done on 7 September 2018, 27 person have been send for test. The test is conduct by Dr Mohamad Fikri Bin Zanal Abidin (HQ/16/DOC/00/557) from Mabello Group of Clinics valid until 20 December 2019.</p> <p>Records of monitoring were made available and maintained. Examples of some records verified were Internal audit conducted by Internal Control Team (ICT), Visiting Sr. Manager report and Harvesting and Manuring Audit by ICT.</p>	Flask	FTS	Sample	Reading	FFA	127.93	131.69	3.76	5.4	3.67	Complied
Flask	FTS	Sample	Reading	FFA									
127.93	131.69	3.76	5.4	3.67									

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 -	Asia POM has all the records with regards to the origins of the FFB received from the third party suppliers which includes the information about the quantity received and the suppliers names. The quantity would then be used to calculate in the mass balance accounting of certified products.	Complied
Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
4.2.1	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. - Minor compliance -	SOP-Methods of nutrient assessment for oil palm fertilizer recommendation (B/015-01/2013) and SOP-Soil and water conservation (C/002-01/2008) were established. Soil analysis and foliar sampling will be monitored on yearly basis. All the visited estates operate in accordance with the Agriculture Manual and standard operating procedures. The practices consistently monitored by estate operation management and regional controller. The recommendations for improvements are given to maintain the sustainable practices.	Complied
4.2.2	Records of fertiliser inputs shall be maintained. - Minor compliance -	Fertilizers were applied as per agronomist recommendation. The records have the information about application date, filed number, dosage applied per palm, type of fertilizer and number of applicators. Types of fertilizer applied were of straight and mixture. The dosage/palm/year generally was around 10kg. For e.g. at ME2, based on Fertilizer Programme for FY 2018/19, Stock Cards, Store Issue Chit (sampled # 1157, 11514, 11493, 11495, 11489), the inputs of fertilisers records were found to be correct as per agronomist recommendation.	Complied

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 -	Leaf and soil nutrient analysis are commonly used in the diagnosis of fertilizer requirements in oil palms. The frequency for soil analysis and leaf sampling is conducted annually. The foliar sampling and soil analysis reports by the company's agronomist were available at the estates. For e.g. at ME2, report dated May 2018 – among the nutrients assessed were Na, N, P, K, Ca, Mg. Recommendation for all the visited estates is around 10 kg/palm/year.	Complied
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 -	EFB application is done as part of nutrient recycling strategy and recorded regularly. All EFB were sourced from compost plant of Asia POM, where the EFB had been mixed with POME to produce compost. The best practice of the compost application is described in the procedure entitled "Standard Operating Procedure (SOP) for Compost Application" [B/022-01/2016, dated 28/10/2016]. Records were available for verification. For e.g., based on the compost application record, as at to-date, ME2 has completed 44% of its program 3,500 mt/175 Ha.	Complied
Criterion 4.3: Practices minimise and control erosion and degradation of soils.			

Criterion / Indicator		Assessment Findings	Compliance
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	Soil maps for each estates were available for verification, which source from British Government's Overseas Development Administration (Land Resources Division) United Kingdom, 1974, for the Sabah Governments. Based on the map, some of the soil series of the visited estates are as follows: <u>ME2:</u> Lungmanis – 54.8% Kertam – 26.2% Bidu-Bidu – 9.52% Rumidi – 7.10% Sapi – 2.38% <u>APO2:</u> Lungmanis & Rumidi – 44% Kertam – 28% Kinabatangan – 28%	Complied
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 -	In order to minimise erosion from planting activities in slopes, the estates practice were to construct terraces and establishment of cover crop such as Mucuna sp. This was sighted during the field visit at all the sampled estates.	Complied
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	Road maintenance program for the current financial year was available for all the visited estates. Among the activities for the road maintenance are grading & compacting and resurfacing, patching. Based on account expenditure report, the progress to-date was in-line with the programme.	Complied

Criterion / Indicator		Assessment Findings	Compliance
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 -	There was no peat soil at all of the visited estates.	Complied
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 -	There was no peat soil at all of the visited estates.	Complied
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 -	There was no fragile or problem soils at all of the visited estates.	Complied
Criterion 4.4:			
Practices maintain the quality and availability of surface and ground water.			
4.4.1	An implemented water management plan shall be in place. - Minor compliance -	Water Management Plan is incorporated with Environmental and Social Improvement Plan – Sabah, which was last updated on 1/8/2018. Among the management plan and implementation at the estates & mill were: - no construction of bunds/weirs/dams across natural waterways passing through the operating units - the quality of the river water was monitored through water sampling analysis at the inlet and outlet of the estates application of compost in accordance to guideline	Complied
4.4.2	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 -	Inlet and outlet point of river crossing the estates were sampled and tested once a year (e.g. by KDC Laboratory [KLK]) For e.g., at HL3, the latest report (R18/8/17) was dated 1/8/2018, where samples taken on 18/7/2018. The results were then analysed in order to see the pollution threat of the river. Based on the latest results, no significant pollution threat was identified.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.4.3	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). - Minor compliance -	The mill applies the biological system with multiple ponds in series for its treatment of effluent. The quality of discharged effluent was analysed every month and the parameters are T, pH, BOD, COD, TS, SS, O&G, AN and TN. Last 12 months results were verified where highest BOD = 53.9 ppm while lowest was 5.3 ppm. Most of the times, the results complied with the regulated requirement i.e. 20 ppm. The mill acknowledged the non-compliance when the reading was 53.9 ppm and took immediate action to investigate and mitigate. Investigation showed that the retention time was not enough and the mill immediately stopped the discharge. Geo-tube desilting method has been approved and implement next year and installation of a new mixer.	Complied
4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	Water was sourced from nearby river, pumped into a catchment pond, treated and used by the mill. The consumption was measured by flowmeter and recorded in "Summary of Consumption Water/mt FFB". Based on the records, last FY consumption was 1.46 lt/mt FFB and current FY was around 1.8 lt/mt FFB.	Complied
Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.			

Criterion / Indicator		Assessment Findings	Compliance
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	<p>SOP – Guidelines in integrated pest and disease management of oil palm (L/001-06/2017) was available dated 7 May 2017. The Integrated Pest Management Plan was established thereafter. There was including Biological Control, Cultural practices and chemical control in their plan dated 28 July 2018. IPM Plan includes the planting of beneficial plants and control of damage by rodents. Beneficial plants such as Tunera subulata, Antigonon Leptopus and Cassia are grown in the estates as per manual under 5.0(Biological control and 6.0(IPM Of leaf eating caterpillars.)</p> <p>In Hwa Li estate Div 3, IPM plan is available dated 18 August 2017 for FY 2017/18, Sampling on record of monitoring for Ganoderma cencus at Melewar 2 estate dated on 8 Feb 2018 at Field PM99A03 by Bunga Baktiar and Juharni (staff), the result is 3.84% damage and recommended to continuous monitoring approved by Assistant manager dated 9 Feb 2018.</p>	Complied
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	<p>The training for IPM in Melewar 2 estate is available, the record dated 12 June 2018 attended by 8 person (head gang) that involve during census trained by Mr Sudirman Sofian (assistant manager). The evaluation have been done and result average around 85% for all staff involve.</p> <p>In Hwa Li estate Div 3, IPM training(Ganoderma, nettle caterpillar, and Rat Cencus training)have been conduct on 21 March 2018 by Tony Tiwon and attended by 7 person.</p>	Complied
<p>Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment</p>			

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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 for all pesticides used was stated in the SOP for Pest and disease management and also in the IPM plan (Justifications for Pesticide Usage under IPM (Insecticide, Fungicide & Rodenticide) (B/009-12/2018) dated 19 April 2018. 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 used (including active ingredients used and area treated, amount of active ingredients applied per ha and number of applications) were established and monitored. The records of weeding programme and herbicide master list was sighted.	Complied												
		<table border="1"> <thead> <tr> <th>Average application</th> <th>FY 17/18</th> <th>FY 18/19 (to date until Oct 2018)</th> </tr> </thead> <tbody> <tr> <td>Melewar 2</td> <td>0.93</td> <td>0.68</td> </tr> <tr> <td>Asia Oil Palm</td> <td>0.82</td> <td>0.61</td> </tr> <tr> <td>Hwa Li Estate Div 3</td> <td>0.63</td> <td>0.2</td> </tr> </tbody> </table>	Average application	FY 17/18	FY 18/19 (to date until Oct 2018)	Melewar 2	0.93	0.68	Asia Oil Palm	0.82	0.61	Hwa Li Estate Div 3	0.63	0.2	
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Criterion / Indicator		Assessment Findings	Compliance
4.6.3	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. - Major compliance -	The management encourage establishing biological control as per IPM plan. The implementation in the field is consistent with the SOP operation Guidelines in integrated pest and disease management of oil palm (L/001-06/2017) was available dated 7 May 2017. In Asia Oil Palm, IPM plan is available dated 1 August 2018 by Tamilselvan. Sampling on Nettle caterpillar action plan is To plant predator <i>Cassia cobaneensis</i> and <i>Tunera sp.</i> and also census palm at 10 % yearly. From the implementation record for planting beneficial plant under continuous improvement palb for AOP2 at Field 17A dated planting 2018 with hectare 226.32 ha with 1286 piece. For cencus record is latest is dated 5 Sept 2018 at field PR16(A8) immature area by Hasan Bin Muhidin result is none detect of nettle caterpillar.	Complied
4.6.4	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. - Minor compliance -	There are no Class 1A and Class 1B at the Melewar Estate 2 and Asia Oil Palm Estate during this assessment. Last Using Class 1B Paraquat is on 30 Sept 2010 as per Store chit (store code: 050215).	Complied

Criterion / Indicator		Assessment Findings				Compliance																																	
4.6.5	<p>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).</p> <p>- Major compliance -</p>	<p>Training records for staff and workers on IPM implementation were available and verified to be satisfactory during on-site assessment. For Asia Oil Palm, Melewar 2, and Hwa Li estate sampling on Farahnizah (store keeper), Aishah,Alkira & Isnawati(sprayer),Haerul and Nur(Manuring) as per detail below:-</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Training Topic</th> <th>Trainer</th> <th>Workers</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>27 April 2018</td> <td>SDS training</td> <td>Mr Sudirman</td> <td>Isnawati</td> <td rowspan="3">Melewar 2</td> </tr> <tr> <td>30 March 2018</td> <td>Spraying training</td> <td>Mr Tahir</td> <td>Alkira</td> </tr> <tr> <td>27 April 2018</td> <td>Triple rinse training</td> <td>Mr Tahir</td> <td>Aishah</td> </tr> <tr> <td>11 June 2018 and 13 June 2018</td> <td>Training for Store keeper for handling chemical and fertiliser.</td> <td>Mr Tamil</td> <td>Farahnizah</td> <td>Asia Oil Palm</td> </tr> <tr> <td>22 March 2018</td> <td>Training on manuring and rat bait</td> <td>Mr Tony Timon</td> <td>Haerul Baharudin</td> <td>Hwa Li Div 3</td> </tr> <tr> <td>8 March 2018</td> <td>Training spraying</td> <td>Mr Juiri Amor</td> <td>Nur Binti Najib</td> <td>Hwa Li</td> </tr> </tbody> </table>				Date	Training Topic	Trainer	Workers	Estate	27 April 2018	SDS training	Mr Sudirman	Isnawati	Melewar 2	30 March 2018	Spraying training	Mr Tahir	Alkira	27 April 2018	Triple rinse training	Mr Tahir	Aishah	11 June 2018 and 13 June 2018	Training for Store keeper for handling chemical and fertiliser.	Mr Tamil	Farahnizah	Asia Oil Palm	22 March 2018	Training on manuring and rat bait	Mr Tony Timon	Haerul Baharudin	Hwa Li Div 3	8 March 2018	Training spraying	Mr Juiri Amor	Nur Binti Najib	Hwa Li	Complied
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22 March 2018	Training on manuring and rat bait	Mr Tony Timon	Haerul Baharudin	Hwa Li Div 3																																			
8 March 2018	Training spraying	Mr Juiri Amor	Nur Binti Najib	Hwa Li																																			

Criterion / Indicator		Assessment Findings	Compliance																				
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. The emergency contact no, Emergency response plan, spill kit is available in the store, during interview with store keeper in estate they understand and competent regarding to safety and environment.	Complied																				
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	<p>The quantity of agrochemicals required for various field conditions are documented and justified in the SOP – Guidelines in integrated pest and disease management of oil palm (L/001-05/2014). The implementation in the field is consistent with the SOP. As todate, there was no outbreak of pest and disease. The application as per below:-</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Date</th> <th>Type of spraying</th> <th>Field</th> </tr> </thead> <tbody> <tr> <td>Melewar 2</td> <td>13 Nov 2018</td> <td>Selective</td> <td>95B3</td> </tr> <tr> <td>Melewar 2</td> <td>27 Oct 2018</td> <td>Circle</td> <td>95A</td> </tr> <tr> <td>Asia Oil Palm</td> <td>11 Nov 2018</td> <td>Circle</td> <td>PR17</td> </tr> <tr> <td>Asia Oil Palm</td> <td>3 Oct 2018</td> <td>Selective</td> <td>PR17 A3</td> </tr> </tbody> </table> <p>All record is available under file spraying costing.</p>	Estate	Date	Type of spraying	Field	Melewar 2	13 Nov 2018	Selective	95B3	Melewar 2	27 Oct 2018	Circle	95A	Asia Oil Palm	11 Nov 2018	Circle	PR17	Asia Oil Palm	3 Oct 2018	Selective	PR17 A3	Complied
Estate	Date	Type of spraying	Field																				
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Criterion / Indicator		Assessment Findings	Compliance
4.6.8	Pesticides shall be applied aerially 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 spray was carried out at Melewar 2 estate, Hwa Li Div 3 and Asia Oil Palm Estate 2 Unit	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 Melewar 2 estate. Training records for staff and workers on IPM implementation as per ind 4.6.3 were available and verified to be satisfactory during on-site assessment	Complied
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 -	Proper disposal of waste material in accordance to company procedures and understood by workers and managers. Interview with management team and employees revealed that proper disposal of waste materials is understood. There was no issue of burning of wastes observed at the visited line sites. Waste recycling programme (3R) and recyclable and domestic waste promoted by the management.	Complied

Criterion / Indicator	Assessment Findings	Compliance
4.6.11	<p>Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated.</p> <p>- Major compliance -</p> <p>Medical surveillance conduct on 17 August 2018 at Mabello Group of Clinics by Dr Mohamad Fikri Bin Zanal Abidin (HQ/16/DOC/00/557), OHD valid until 20 December 2019</p> <p>From verification medical surveillance for Spraying gang as per below;-</p> <ol style="list-style-type: none"> 1) Aisyah Yusman (Lab no. 18-1867484) 2) Isnawati Sudi (Lab no. 18-1867481) 3) Alkira Akbar (Lab no. 18-1867478) 4) Moh Nur Mad Jusa(lab no. 18-1867301) <p>The result show the are fit to work with pesticide.</p> <p>For Asia Oil Palm, sampling on manuring workers already conduct on 23 Feb 2018 At Mabello Group Of Clinicas per below:-</p> <ol style="list-style-type: none"> 1) Murni Hasan (Lab No. 18-1110468-R) 2) Irfan Sapu (Lab no. 18-1110472-R) 3) Arif Bolong (Lab no. 18-1110471-R) 4) Reginaldus Nikodemus (Lab no. 18-1110451-R) <p>The result show the are fit to work with Manuring.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance																												
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	<p>The test was carried out by Medical Assistant of estate for the female workers.</p> <table border="1"> <thead> <tr> <th>Employee No</th> <th>Last test</th> <th>Result</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>Aisyah Yusman</td> <td>4 Nov 2018</td> <td>Negative</td> <td rowspan="3">Melewar 2</td> </tr> <tr> <td>Isnawati Sudi</td> <td>4 Nov 2018</td> <td>Negative</td> </tr> <tr> <td>Alkira Akbar</td> <td>4 Nov 2018</td> <td>Negative</td> </tr> <tr> <td>Murni Hasan</td> <td>1 Nov 2018</td> <td>Negative</td> <td>Asia Oil Palm</td> </tr> <tr> <td>Syamsiah Abu Bakar</td> <td>30 October 2018</td> <td>Negative</td> <td rowspan="3">Hwa li</td> </tr> <tr> <td>Ita Nanrang</td> <td>30 October 2018</td> <td>Negative</td> </tr> <tr> <td>Rini Kamarudin</td> <td>30 october 2018</td> <td>Positive</td> </tr> </tbody> </table> <p>From Hwa Li estate Div 3 record found Rini Kamarudin is pregnant, management already transfer Rini from spraying work to General work as per Letter dated 1 Nov 2018 from Junior manager (Raja Ismail Raja Deraman).</p>	Employee No	Last test	Result	Estate	Aisyah Yusman	4 Nov 2018	Negative	Melewar 2	Isnawati Sudi	4 Nov 2018	Negative	Alkira Akbar	4 Nov 2018	Negative	Murni Hasan	1 Nov 2018	Negative	Asia Oil Palm	Syamsiah Abu Bakar	30 October 2018	Negative	Hwa li	Ita Nanrang	30 October 2018	Negative	Rini Kamarudin	30 october 2018	Positive	Complied
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Criterion 4.7:																															
An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:																															

Criterion / Indicator	Assessment Findings	Compliance
4.7.1	<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.</p> <p>- Major compliance -</p> <p>OSH Policy is establish by Company dated 15 January 2018 signed by Tay Chwee Leong for Mill and for estate is signed by Tee Swee Kee with same date. The training for policy have been conduct on 7 Feb 2018 for staff and 1 September 2018 for workers in Asia Oil Palm Estate 2.</p> <p>OSH manual (Group Safety And Health Manual) is available in J.C.Chang Pte Ltd dated 13 February 2007 from chapter 1 until chapter 17 including safety and health management, policy, workplace inspection, ERP, safety performance and others.</p> <p>Training needs and plan is available for year 2018, the training is cover for CCP, GAP for each station, Safety and ERP, Sustainability programme and NIOSH programme.</p> <p>OSH programme for Melewar 2 estate is available dated on 17 August 2018, this OSH programme include to establish procedure related to safety and health aspect according to the needs of operational.</p>	Complied

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. - Major compliance -</p> <p>OSH manual (Group Safety And Health Manual) is available in J.C.Chang Pte Ltd dated 13 February 2007 from chapter 1 until chapter 17 including safety and health management, policy, workplace inspection, ERP, safety performance and others. CHRA for Asia Palm Oil mill dated 18 Feb 2016 by Dr Mohd Azizan (HQ/10/DOC/00/157) from DAB OH Sdn Bhd however found some new chemical such as MCEM CT 360, CT 201 and CT 205 in chemical register updated 7 August 2018 is not been survey by CHRA assessor during assessment on Feb 2016. Medical surveillance for Mill conduct 20 Oct 2018 and sent total workers 31 Workers. The workers is fit to works. The latest result for Medical surveillance, sampling on Rosli Bin Sadik (lab no 18-1782107) found the result for checking the 2,5 – Hexanedione is fit to work.</p> <p>CHRA for Melewar 2 estate, conduct on 27 August 2018 by Mohd Amin Bin Adrah JKPP Kim127/453/6(30). Chemical register updated on 15 July 2018. For CHRA Asia Oil Palm Estate already conduct the assessment dated 11 August 2015 by CHRA Industrial Hygiene Service Sdn Bhd. On 3 April 2017 and 28 August 2019 Asia Oil Palm have review new CHRA by same assessor (Zainatul Hazreen Bt. Abdul hamid) JKPP HIE 127/171-2 (319) because some amendment to new chemical. The Chemical register is updated 27 August 2018.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance																																												
<p>4.7.3 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>Training Scheduled for 2018 was established. Awareness and training programme had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding SDS, safe working practices and the correct use of PPE. Suitable PPE has been provided to the workers based on the information in the SDS and CHRA assessor's recommendation. Sampling on Asia Oil Palm estate 2 for PPE issuance as per detail below:-</p> <table border="1" data-bbox="1025 687 1823 1043"> <thead> <tr> <th>Name</th> <th>Type of PPE</th> <th>Date</th> <th>Previous issuance</th> </tr> </thead> <tbody> <tr> <td>Murni Hasan</td> <td>Half piece respirator</td> <td>29 Sept 2018</td> <td>12 May 2018</td> </tr> <tr> <td>Marni</td> <td>Nitril glove</td> <td>14 July 2018</td> <td>6 Nov 2018</td> </tr> <tr> <td>Sumi</td> <td>Goggles</td> <td>23 Sept 2018</td> <td>2 August 2017</td> </tr> <tr> <td>Tija</td> <td>Apron</td> <td>11 Oct 2018</td> <td>10 March 2018</td> </tr> <tr> <td>Reginaldus</td> <td>Half piece respirator</td> <td>11 Oct 2018</td> <td>4 Nov 2017</td> </tr> <tr> <td>Irfan Sapu</td> <td>Helmet</td> <td>28 May 2017</td> <td>16 Oct 2015</td> </tr> </tbody> </table> <p>Sampling on Hwa Li Div 3 estate for PPE issuance for Harvester:-</p> <table border="1" data-bbox="1025 1110 1823 1374"> <thead> <tr> <th>Name</th> <th>Type of PPE</th> <th>Date</th> <th>Previous issuance</th> </tr> </thead> <tbody> <tr> <td>Jamal</td> <td>Goggles</td> <td>8 sept 2018</td> <td>No issue because new workers</td> </tr> <tr> <td>Amry Jumma</td> <td>Hard Hat</td> <td>28 Sept 2017</td> <td>25 Sept 2013</td> </tr> <tr> <td>Bayu Pabpu</td> <td>Sickle Cover</td> <td>20 December 2017</td> <td>1 Nov 2016</td> </tr> </tbody> </table>	Name	Type of PPE	Date	Previous issuance	Murni Hasan	Half piece respirator	29 Sept 2018	12 May 2018	Marni	Nitril glove	14 July 2018	6 Nov 2018	Sumi	Goggles	23 Sept 2018	2 August 2017	Tija	Apron	11 Oct 2018	10 March 2018	Reginaldus	Half piece respirator	11 Oct 2018	4 Nov 2017	Irfan Sapu	Helmet	28 May 2017	16 Oct 2015	Name	Type of PPE	Date	Previous issuance	Jamal	Goggles	8 sept 2018	No issue because new workers	Amry Jumma	Hard Hat	28 Sept 2017	25 Sept 2013	Bayu Pabpu	Sickle Cover	20 December 2017	1 Nov 2016	<p>Complied</p>
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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>Appointment letter of responsible for safety for Asia POM is dated on 1 July 2018 for En Jukli Bin Hosin. The workplace inspection is conducted dated on Oct 2018 by Herianto and Temmy. OSH chart is available and updated, the appointment letter latest dated 8 Oct 2018, sampling for Mr. Shadeeshkumar A/L Visanathan and 9 August 2018 for Mr Jukli Hosin.</p> <p>In Asia Oil Mill, the OSH meeting is conduct on 2 Nov 2018 and previously is on 9 August 2018. From the record meeting 1 accident happen on 30 April 2018 and have Medical cert total 13 days. The HIRARC already reviewed on 3 May 2018 and compensation already have been given to the workers.</p> <p>For Melewar estate, the OSH meeting is conduct 3 month once and latest meeting conduct on 31 Oct 2018 and 25 July 2018. Asia Oil Palm Estate, OSH meeting is conduct as per OSHA 1996 quarterly conduct (3 month once), meeting have been conduct on 12 September 2018, 13 June 2018, 13 March 2018 and 13 December 2018. Appointment letter for OSH responsible is Mr Tamil Selvan A/L Murthy dated 1 October 2018. Osh Committee is available for Asia Oil Palm Estate 2 dated on 10 August 2018, sampling on OSH committee appointment letter for Mr Dan Russel C.J. Impas.</p>	<p>Complied</p>

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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.</p> <p>- Minor compliance -</p> <p>Emergency Response Plan (Fire fighting and Fire drill) training is on 3 October 2018 by Sudirman Sofian attended by all workers and staff. SOP for Emergency response plan is available dated 28 Jan 2018 under Doc ref. no U/002-01/2015, this SOP including :-</p> <ul style="list-style-type: none"> a) Fire outbreak b) Instrusion c) Riot d) Chemical spillage e) Banjir and etc. <p>The training have been conduct for their worker, example sampling such as for Asia Oil Pal Estate 2 Firefighting already conduct for control fire out break on 9 July 2018.</p> <p>In Melewar estate, First aid checklist is available in First ad box, The first aid box inspection is by Monthly by Hospital Assistant based latest record is on 3 Nov 2018.</p> <p>In Asia Palm Oil mill, Accident happen in 30 April 2018 in workshop area, JKPP 6 already send to dosh on 7 May 2018. HIRARC already review on 27 September 2018. The JKPP 8 record is available dated 8 Jan 2018 under record JKPP8/12535/2017, 4 accident and 1 accident record have lost time injury 186 days, refer 4.7.6 for accident insurance record.</p> <p>For Melewar 2 estate, have 3 accident including 1 major accident with 26 day lost time injury. The major accident happen on 21 April 2018 for Eddi Arjuna, the JKPP 6 already sent on 23 April 2018 and accident investigation conduct on 22 April 2018. HIRARC already review for this accident. First aider training have been conduct on 5 May 2018 by Hospital Assistant (Misna Octavia Made) attended by 10 person and the latest training on 15 August 2018 conduct by HA also.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance															
4.7.6	All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -	<p>Medical care and accident insurance is provided to all the employees. Local workers are covered under SOCSO scheme while foreign workers are covered under foreign workers compensation scheme. Example as per below:-</p> <p>For Mill foreign workers insurance policy cover under no J/18/WF00/046613/JHR-29 from Lonpac Sn Bhd valid from 1 August 2018 until 31 July 2019 covered 90 person foreigner. For local workers is cover under SOCSO latest payment record for KWSP 6 Form A is October 2018 cover 62 Person.</p> <p>For Melewar 2 estate foreign workers insurance policy cover under no J/18/WF00/046797/JHR-22 from Lonpac Sn Bhd valid from 1 Sept 2018 until 31 August 2019 covered 191 person foreigner. For Asia Oil Palm Estate 2 foreign workers insurance policy cover under no J/18/WF00/046614/JHR-27 from Lonpac Sn Bhd valid from 1 August 2018 until 31 July 2019 covered 238 person foreigner.</p>	Complied															
4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	<p>LTA for Asia Oil Mill & Supplier is available as per below :-</p> <table border="1"> <thead> <tr> <th>LTA 2017</th> <th>LTA 2018 (to date Oct 2018)</th> <th>Operating Unit</th> </tr> </thead> <tbody> <tr> <td>33.33</td> <td>8.33</td> <td>Asia POM</td> </tr> <tr> <td>60.00</td> <td>13</td> <td>Melewar 2</td> </tr> <tr> <td>44.83</td> <td>8.15</td> <td>Asia Oil Palm</td> </tr> <tr> <td>3.82</td> <td>1.48</td> <td>Hwa Li</td> </tr> </tbody> </table> <p>The Record is available under JKPP 8 that already been sent to DOSH on Jan 2018. For todote is calculate and keep record by Hospital assistant at each estate.</p>	LTA 2017	LTA 2018 (to date Oct 2018)	Operating Unit	33.33	8.33	Asia POM	60.00	13	Melewar 2	44.83	8.15	Asia Oil Palm	3.82	1.48	Hwa Li	Complied
LTA 2017	LTA 2018 (to date Oct 2018)	Operating Unit																
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3.82	1.48	Hwa Li																

Criterion / Indicator	Assessment Findings	Compliance
Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.		

<p>4.8.1</p>	<p>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 -</p>	<p>Training Scheduled for FY2018/19 was established. Awareness and training programme had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding SDS, all activities, safe working practices and the correct use of PPE, aspects of RSPO and etc. The sampling training that have been done as per below:-</p> <table border="1" data-bbox="1025 603 1823 1342"> <thead> <tr> <th>Date</th> <th>Training Topic</th> <th>Trainer</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>27 April 2018</td> <td>SDS training</td> <td>Tahir</td> <td rowspan="5">Melewar</td> </tr> <tr> <td>30 March 2018</td> <td>Spraying training</td> <td>Tahir</td> </tr> <tr> <td>11 April 2018</td> <td>Triple rinse training</td> <td>Tahir</td> </tr> <tr> <td>25 September 2018</td> <td>Cencus training</td> <td>Sudirman Sufian</td> </tr> <tr> <td>25 September 2018</td> <td>PPE training</td> <td>Sudirman Sufian</td> </tr> <tr> <td>28 March 2018</td> <td>First aid training</td> <td>Efendy (HA)</td> <td rowspan="3">Asia Oil Palm</td> </tr> <tr> <td>8 Sept 2018</td> <td>Manuring Training</td> <td>Rahman</td> </tr> <tr> <td>29 Sept 2018</td> <td>Rat Bait Training</td> <td>TamilSelvan</td> </tr> </tbody> </table>	Date	Training Topic	Trainer	Estate	27 April 2018	SDS training	Tahir	Melewar	30 March 2018	Spraying training	Tahir	11 April 2018	Triple rinse training	Tahir	25 September 2018	Cencus training	Sudirman Sufian	25 September 2018	PPE training	Sudirman Sufian	28 March 2018	First aid training	Efendy (HA)	Asia Oil Palm	8 Sept 2018	Manuring Training	Rahman	29 Sept 2018	Rat Bait Training	TamilSelvan	<p>Complied</p>
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Criterion / Indicator		Assessment Findings				Compliance
		9 July 2018	Fire Fighting Training	Zaheruddin		
		11 July 2018	Fire Drill training	Zaheruddin		
		23 January 2018	Harvesting Training	Tony	Hwa Li	
		1 June 2018	Safety on sickle management training	Tony		
		13 August 2018	First Aid Training	Suzy Ayadun		
		12 nov 2018	Fire Fighting and Fire Drill training	Helddy		
4.8.2	Records of training for each employee shall be maintained. - Minor compliance -	In Melewar 2 estate, Asia Oil Palm estate, the training record summary is been kept at each personal file. The record training is available in training file record.				Complied
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.						

Criterion / Indicator		Assessment Findings	Compliance
5.1.1	An environmental impact assessment (EIA) shall be documented. - Major compliance -	Few methods of environmental impact identification and evaluation, e.g. 1) Proposal for Mitigation Measure (PMM) PMM report for 272.32 Ha of replanting [ref.: Akujanji signed on 20/9/2018, Syarat-syarat Perisytiharan Pengurangan #JPAS/PP/KTN/600-1/11/1/306] PMM report for 234.49 Ha of replanting [ref.: Akujanji signed on 6/11/2017, Syarat-syarat Perisytiharan Pengurangan #JPAS/PP/KTN/600-1/11/1/286]. Among the significant aspects identified were water pollution, water use, agro-chemicals, hazardous materials/wastes, sewage and fishing. 2) Environmental Impact Assessment through SEIA conducted by Wild Asia (refer 5.1.3). Among the identified significant aspects were water quality and availability, contamination of soil or water, air pollution in the form of dust emissions or greenhouse gas emissions, loss of bio-diversity.	Complied
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 -	The continuous implementation of the improvements activities were checked during the field and document audit. The environmental management plan has been established to monitor the identified significant activities that give impacts on environment. A specific staff and executive have been appointed to do the monitoring to ensure the plan is effectively implemented. Nonetheless, the implementation of Environmental Compliance Report (ECR) for the approved replanting Proposal for Mitigation Measure (PMM) could be further improve by conducting it in timely manner (OFI raised under 2.1.1).	Complied

Criterion / Indicator	Assessment Findings	Compliance
5.1.3	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. - Minor compliance -	Complied
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.		
5.2.1	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 -	Complied
5.2.2	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 -	Complied

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 -	Although there was no RTE species identified, evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities were maintained and implemented. Apart from giving education through morning briefing from time to time, signage was utilised as part of creating awareness among employees on the restriction of capturing/harming/collecting/killing the RTE species.	Complied
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 -	Although there was no area has been identified as HCV within the estates, awareness was continuously given to the employees through the methods mentioned in 5.2.3. Monitoring of river buffer zones especially in term of encroachment or sighting of wildlife has still been continued.	Complied
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 -	No HCV set asides with existing rights of local communities have been identified.	Complied
Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.			

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Criterion / Indicator		Assessment Findings	Compliance
5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	Waste products and sources of pollution were identified and documented as per the Waste and Waste Products Identification and Disposal Plan, F/007-06/2016 The documentation and identification of all the waste products such as scheduled waste, domestic waste and recyclable waste such as metal, plastic, mill waste and polluting materials e.g. used lubricants, boiler ash and empty fruit bunches were maintained and monitored at the Mill. Scheduled Waste identified included spent hydraulic oil (SW 305), used filters (SW 410), hydraulic hose (SW409) and empty lubricants container (SW409).	Complied

Criterion / Indicator		Assessment Findings	Compliance
5.3.2	All chemicals and their containers shall be disposed of responsibly. - Major compliance -	<p>The mill disposed its empty chemical containers through scheduled wastes method. Based on verification of the legal consignment notes (6th Schedule of SW Reg.), the empty containers were disposed appropriately to the authorised collectors.</p> <p>As for the estates, empty chemical containers were triple rinsed and punctured before sending them to recyclers. E.g.:</p> <p><u>ME2:</u> ECC last disposal on 9/11/2018 – to Newgates Industries (Borneo) Sdn Bhd – weighbridge ticket dated 9/11/2018 & letter #ME2/H110/201819-05/DM/nivea – 90 kg</p> <p><u>HLE3:</u> ECC last disposal on 12/10/2018 – to Newgates Industries (Borneo) Sdn Bhd – weighbridge ticket #PLC18000001W, dated 12/10/2018 & letter #HLE/PC/(115/00)/2018-yan – 1,200 kg</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -	<p>Wastes management and disposal plan was made available for verification. Apart from scheduled wastes were disposed in accordance to legal requirements, the recyclable wastes were sent to appropriate collectors, e.g.:</p> <p><u>ME2:</u> other recyclable wastes e.g. box, plastic bottles, aluminium, & zinc was last sent to a recycle centre (Newgates) on 19/10/2018 [letter ref.: ME2/H110/20180-01DM/nivea].</p> <p>Domestic wastes from labour quarters and office were disposed through landfill method in the estates. Verification of locations of the landfill showed that the landfill areas were far from the residential areas and waterways.</p>	Complied
<p>Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>			
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>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. E.g. for the mill, the to-date consumption was recorded to be 2.34 lt/mt FFB. The figure was high due to not enough fibre due to replanting. For the estates 7.75 lt/mt FFB has been consumed. Nonetheless, it was still under control where the budgeted fossil fuel was 8.10 lt/mt FFB</p>	Complied
<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	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. - Major compliance -	Under the Group Policy, using fire for land preparation is not allowed. Based on site visit at replanting areas, there was no trace of open burning observed.	Complied
5.5.2	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. - Minor compliance -	Fire was not used for preparing land for replanting at the estate.	Complied
Criterion 5.6:			
Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			
5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -	The Mill and estates had reviewed the environmental impact assessment on potential pollution to water, gaseous emissions to air and contamination on land. Monitoring of mill gas emissions is being done online using the Continuous Emissions Monitoring System (CEMS) and supported by the Ringelman Smoke Chart. POME treatment, monitoring and land application is monitored, maintained and adhered to DOE regulations. Stake sampling was done in Mar & Apr 18 (1 st half) and Sep 18 (2 nd half) for both chimneys (# 1 & 2) – all results below 0.4 i.e. between 0.227 to 0.247 g/Nm ³	Complied

Criterion / Indicator		Assessment Findings	Compliance
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	Identification of significant pollutants and greenhouse gas (GHG) emissions has been done e.g. POME, methane gas, diesel / fuel and fertilizer. Their usage have been recorded and documented at each of the operating units. Approved GHG calculator, Palm GHG was used for the calculation during implementation period. A bio-gas plant which was commissioned in 2015 has been contributing in reducing the GHG emission.	Complied
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 -	GHG report for Jul 17 to Jun 18 performance has been submitted to RSPO secretariat on 30/10/2018. Verification of the sampled input data through reviewing of store issuance report and bin cards showed that all the raw data was traceable. Nevertheless, the accuracy of some of the input data need to be improved especially in term of unit of measurement (OFI).	Complied
<p>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.</p> <p>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>			

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Criterion / Indicator	Assessment Findings	Compliance	
6.1.1	<p>A social impact assessment (SIA) including records of meetings shall be documented.</p> <p>- Major compliance -</p>	<p>Social & Environmental Impact Assessment including a Preliminary Management Review report dated 26 May 2011 done by Wild Asia (Malaysia) for study conducted from 3rd to 09th April 2011. Report ref/ 26-May- 11/Draft_P112_2011_Carotino_SEIA_26th May 2011 and final report: 13 July 2011/P112_2011_JCC Group_SEIA_Final Report.</p> <p>Based on the preliminary study, annual review was conducted to establish Social Improvement Plan. Latest group review Environmental and Social Improvement Plan-Sabah (Doc No: N/009-01/2018) was done on 17/8/2018 where Asia and Melewar Production Unit 2 Years Social Improvement Plan has been updated. In each unit, sighted Asia POM (17.08.2018), Melewar Estate Division 2 (17.08.2018), Asia Estate Division 2 (01.08.2018), Environmental and Social Improvement Plan, 01.08.2018 (Hwa Li Estate Division 3).</p>	Complied

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 -	<p>Stakeholder meeting was conducted on 26/9/2018 at Melewar Oil Palm Estate Div. 2, 10.09.2018 & 02.02.2018 (Asia POM Meeting Room), 17.04.20018 (Asia Oil Palm Estate 2), 17.04.2018 (Asia Oil Palm Estate 2) and 18.09.2018 (Hwa Li Estate Division 3) and 12.09.2018 (Hwa Li Estate Division 3 visited Genting Landworthy Estate), 13.09.2018 (Hwa Li Estate Division 3 visited Pertasa Estate), 08.03.2018 (Hwa Li Estate Division 3 visited Genting Bahagia Estate) and 13.09.2018 (Hwa Li Estate Division 3 visited Timora Estate. All representatives from each Asia Production Unit including Asia Palm Oil Mill, Asia 2 Estate, Melewar Div. 2 Estate, Hwa Li 3 Estate, Lam Soon Estate and others attended the meeting with local stakeholders.</p> <p>Among stakeholders attended the meeting are local community/village representative, neighbouring companies/premises, vendors/suppliers and government agencies representatives including school teacher. Record of meeting with attendance list and minute of meeting were recorded. There was no negative issue raised during the stakeholders meeting. Most discussions were closed and on-going. Discussions were recorded in the Management Plan on Social Impact Assessment.</p>	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 -	<p>The meeting was attended by internal stakeholders (staffs and workers) and external stakeholders (contractors, neighbouring estates, and local village representatives) on 10/10/2017. In Asia Oil Palm Estate 2, the stakeholder meeting was conducted in phases on 17.04.2018 for internal stakeholder and 11-16/10/2018 for external stakeholder.</p> <p>A 2 Years Social Improvement Plan (Doc No: N/009-01/2018) was done on 17/8/2018 has been developed as the outcome of the meeting. Person responsible and targeted completion dates were monitored accordingly.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
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 meeting was attended by internal stakeholders (staffs and workers) and external stakeholders (contractors, neighbouring estates, and local village representatives). A 2 Years Social Improvement Plan (Doc No: N/009-01/2018) was done on 17/8/2018 has been developed as the outcome of the meeting. Person responsible and targeted completion dates were monitored accordingly.	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 smallholder schemes included within the certified Asia Production 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>The management has implemented Guidelines on Mechanism for Information Requests by Stakeholders (Doc. Ref. No. E/006-07/2017) dated 11/10/2017 for the reference of consultation with employees and relevant stakeholders.</p> <p>There are 3 types of communication are designed as such:</p> <ul style="list-style-type: none"> • Consultation with employees and other stakeholders – JCC, Complaints and Grievance Procedure and Suggestion Box • Gender group (female) consultation • Free prior informed consent <p>Based on SOP Mechanism for Complaints and Grievances; (Doc. Ref. No. E/006-07/2017) dated 11/10/2017, the procedure specifies the mechanism of complaints and grievances. Company also has the flow chart of Complaints & Grievances Procedure according to level of complaints. Book for complaint & grievance record was maintained but so far, no complaint received. Last request was made on 2016 for Asia POM, 2017 for Melewar Estate Division 2, 2014 for Asia Oil Palm Estate 2 and 2008 for Hwa Li Estate Division 3. For housing repairs, the complaint on house repairs recorded in Borang Aduan Kerosakan form and transferred in the logbook.</p>	Complied
6.2.2	<p>A management official responsible for these issues shall be nominated.</p> <p>- Minor compliance -</p>	<p>For Mill:</p> <p>Nominated responsible person is Mr. Mohd Jaini (Admin Officer in Asia POM), Mr. Tahir Abdul Hafid (Assistant Manager in Melewar Estate Division 2) and Mr. Dann Russek C.J. Impas (Asia Oil Palm Estate 2) and Mr. Helddy Jakaria & Mr. Albario Valentine (Hwa Li Estate Division 3) as per appointment letter.</p> <ul style="list-style-type: none"> • Stakeholders Requests, Complaints & Grievances • Non-confidential sustainability data/information on social, environmental and legal issues 	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
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>The stakeholder list for Asia POM, Asia 2 Estate, Hwa Li 3 and Melewar Division Estate Div. 2 and Hwa Li Estate Division 3 are updated on 14.09.2018, 13.09.2018, 01.07.2018 and 01.10.2018 which included:</p> <ul style="list-style-type: none"> • Suppliers of materials and services • FFB suppliers (Outsider) • Local NGO's and statutory bodies • Local communities 	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>			
6.3.1	<p>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.</p> <p>- Major compliance -</p>	<p>Based on SOP Mechanism for Complaints and Grievances; (Doc. Ref. No. E/006-07/2017) dated 11/10/2017, which found effective, timely, appropriate and open to any affected parties. The complaint and grievances is open to effected parties including internal and external stakeholders.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –	<p>Both mill and estate management maintained the list for local communities and other relevant stakeholders. The SOP was briefed by the management to the internal stakeholders.</p> <p>Sampled request examples are sighted:</p> <ul style="list-style-type: none"> •Asia POM: Weighing of Diesel Lorry on 06.11.2018 from Asia Estate Div. 2 •Asia POM: Memohon bekalan air sebanyak 1 tangki untuk kegunaan kontraktor on 02.11.2018 from Hwa Li Div. 3 Estate. •Melewar Estate Division 2: Asking for the buffalo loan deduction on 6.11.2018. •Melewar Estate Division 2: Request passport to go back to hometown on 07.09.2018. •Asia Oil Palm Estate 2: Request from Asia POM for give access for car from Syarikat Wawasam Oil Recycle to pass the gate with carrying used oil (SW305, SW409 and SW410) on 09.11.2018. •Asia Oil Palm Estate 2: Request from Asia POM for give access for car from Syarikat Wing Contractor (Lori SD 3107) to pass the gate with carrying 1 Panel BRC A10 to be brought to Melewar POM on 07.11.2018. •Hwa Li Estate Division 3: Request on electricity at house no A24 on 12.02.2018. •Hwa Li Estate Division 3: Request on borrowing the used pipe for Kenduri Akikah on 12.02.2018. 	Complied
<p>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.</p>			

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Criterion / Indicator		Assessment Findings	Compliance
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 -	SOP for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation; Doc. Ref. no.: E/002-03/2015; Doc. date: 8/9/2015. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders sighted at time of audit. Company has the FPIC Procedure in Doc Ref No: E/004-07/2015 dated 09.09.2015 as well as referring to Resolution and Compensation Procedure Ref. E/002-02/2012 dated 11.09.12.	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 -	SOP for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation; Doc. Ref. no.: E/002-03/2015; Doc. date: 8/9/2015. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders sighted at time of audit.	Complied
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 issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders sighted at time of 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.			

<p>6.5.1</p>	<p>Documentation of pay and conditions shall be available. - Major compliance -</p>	<p>Salary payment rate was based on Kadar Bayaran Gaji, Elaun DLL (Mulai 01.07.2016) Appendix 3 which kadar kerja harian RM 35.50/sehari and kadar kerja bulanan RM 920.00/bulan. Interview with employees and workers from local and foreign country reveal that they understand details and deductions outlined on their pay slips. Payroll checks confirm that correct remuneration was paid for standard hours as well as for any overtime hours worked.</p> <p>Employee's pay slip reviewed for month of October, July and April 2018;</p> <ol style="list-style-type: none"> 1. Worker ID: G286 Asia POM 2. Worker ID: G026 Asia POM 3. Worker ID: G215 Asia POM 4. Worker ID: AE06 Asia POM 5. Worker ID: G118 Asia POM 6. Worker ID: G197 Asia POM 7. Worker ID: C001 Asia POM 8. Worker ID: G112 Asia POM 9. Worker ID: G134 Asia POM 10. Worker ID: G292 Asia POM 11. Worker ID: MLT1151 Melewar Estate Division 2 12. Worker ID: MLT0724 Melewar Estate Division 2 13. Worker ID: MLT1207 Melewar Estate Division 2 14. Worker ID: MLT0738 Melewar Estate Division 2 15. Worker ID: ML0602 Melewar Estate Division 2 16. Worker ID: MLT1015 Melewar Estate Division 2 17. Worker ID: AE200074 Asia Oil Palm Estate 2 18. Worker ID: AE200366 Asia Oil Palm Estate 2 19. Worker ID: ATO0044 Asia Oil Palm Estate 2 20. Worker ID: AE200494 Asia Oil Palm Estate 2 21. Worker ID: AE200542 Asia Oil Palm Estate 2 	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	22. Worker ID: AE200648 Asia Oil Palm Estate 2 23. Worker ID: HL02023 Hwa Li Estate Division 3 24. Worker ID: HL01686 Hwa Li Estate Division 3 25. Worker ID: HL00048 Hwa Li Estate Division 3 26. Worker ID: HL02275 Hwa Li Estate Division 3 27. Worker ID: HE300125 Hwa Li Estate Division 3 28. Worker ID: HE300901 Hwa Li Estate Division 3	

<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>Pay and conditions are documented however the terms used in the salary deductions are not transparent (example is the used for Tabungan, Tanggungan Passport, Medical Expenses, Buffalo security, Buffalo loan, etc.)</p> <p>Employee's pay slip reviewed for month of October, July and April 2018;</p> <ol style="list-style-type: none"> 1. Worker ID: G286 Asia POM 2. Worker ID: G026 Asia POM 3. Worker ID: G215 Asia POM 4. Worker ID: AE06 Asia POM 5. Worker ID: G118 Asia POM 6. Worker ID: G197 Asia POM 7. Worker ID: C001 Asia POM 8. Worker ID: G112 Asia POM 9. Worker ID: G134 Asia POM 10. Worker ID: G292 Asia POM 11. Worker ID: MLT1151 Melewar Estate Division 2 12. Worker ID: MLT0724 Melewar Estate Division 2 13. Worker ID: MLT1207 Melewar Estate Division 2 14. Worker ID: MLT0738 Melewar Estate Division 2 15. Worker ID: ML0602 Melewar Estate Division 2 16. Worker ID: MLT1015 Melewar Estate Division 2 17. Worker ID: AE200074 Asia Oil Palm Estate 2 18. Worker ID: AE200366 Asia Oil Palm Estate 2 19. Worker ID: ATO0044 Asia Oil Palm Estate 2 20. Worker ID: AE200494 Asia Oil Palm Estate 2 21. Worker ID: AE200542 Asia Oil Palm Estate 2 22. Worker ID: AE200648 Asia Oil Palm Estate 2 23. Worker ID: HL02023 Hwa Li Estate Division 3 24. Worker ID: HL01686 Hwa Li Estate Division 3 25. Worker ID: HL00048 Hwa Li Estate Division 3 	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>26. Worker ID: HL02275 Hwa Li Estate Division 3 27. Worker ID: HE300125 Hwa Li Estate Division 3 28. Worker ID: HE300901 Hwa Li Estate Division 3</p> <p>Sampled the workers passport as above are having the valid work permit and seen also the renewal work permit for employee passport no: AT967945, P0119087A and AT968671 (Asia POM), AU117401, AT683264, AT251009 (Melewar Estate Division 2), B0856124 (Asia Oil Palm Estate 2).</p> <p>The deduction in the pay slip made according to the agreement between workers and employer and already obtained the approval from JTK, Permit Potongan Daripada Gaji Pekerja Seksyen 113(4), Ordinan Buruh (Sabah Bab 67) valid from 14.03.2018 – 14.03.2020 No siri: 600-1/2/13/13(11/KBN/2018-057) for Asia POM and Permit Potongan Daripada Gaji Pekerja Seksyen 113(4), Ordinan Buruh (Sabah Bab 67) valid from 06.09.2018 – 05.09.2018 No siri: 600-1/2/13/138(11/KBN/2018-0285) for Melewar Estate Division 2. In Asia Oil Palm Estate 2, sighted the Permit Potongan Daripada Gaji Pekerja Seksyen 113(4), Ordinan Buruh (Sabah Bab 67) valid from 20 April 2018 until 19 April 2020. In Hwa Li Estate Division 3, the Permit Potongan Daripada Gaji Pekerja Seksyen 113(4), Ordinan Buruh (Sabah Bab 67), No siri: 600-1/2/13/136(11/KBN/2018-087) valid from 11.04.2018 – 11.04.2020.</p> <p>All foreign workers (Indonesia and Philippine nationalities) understood Malay as per their contract employment and having the valid work permit. For OT, there is a maximum of 104 hours allowed as per Sabah Labour Ordinance but no sampled workers worked more than the maximum 104 hours noted.</p>	

<p>6.5.3</p>	<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. - Minor compliance –</p>	<p>The standard of housing provided for workers and their families meets government regulations, Act 446 Workers' Minimum Standards Of Housing And Amenities Act 1990.</p> <p>Asia POM complex has continued implementing the plan for replacing housing. Electricity is subsidized and water is supplied at no charge.</p> <p>Water to housing was self-treated water where the treated water undergoes monitoring by the mill management on at least half yearly basis. Seen the latest water treatment result for domestic used in 25 September 2018 and 23 March 2018 for Asia POM as per water management plan for treated water, both resulted no detection of e-coli and total coliform. The reference is made to the Guideline on River Water Sampling Procedures, RSPO Criterion 4.4-Ver 1, dated 4.2.2010.</p> <p>In Melewar Estate Division 2, the water analysis has been conducted by Pejabat Kesihatan Kawasan Kinabatangan on 20 March 2018 and resulted 0.01 mg/l (TPO Melewar 2/treated water) and 0.04 mg/l (Rumah Melewar 2/treated water), total coliform: 150 mg/l (TPO Melewar 2/treated water) and 20 mg/l (Rumah Melewar 2/treated water), Ammoniacal Nitrogen 1.6 mg/l (TPO Melewar 2/treated water) and 0 mg/l (Rumah Melewar 2/treated water) and Manganese 1.26 mg/l (TPO Melewar 2/treated water) and 0 mg/l (Rumah Melewar 2/treated water). Based on estate's management plan, they has requested the private laboratory to advise on the chlorination process on 20.10.2018, close the leakage of the water tank and install the no fertilizer application at near the water septic.</p>	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<p>1 Asia Palm Oil Estate 2 and Hwa Li Estate Division 3. The water analysis has been conducted 2x/year. Seen the result dated 25.09.2018 and 23.03.2018 for Asia Palm Oil Estate 2 and 14.08.2018 and 15.08.2018 by Pejabat Kesihatan Kawasan Kinabatangan for Hwa Li Estate Division 3 with no presence of total coliform and e-coli by Dynakey Laboratory Sdn Bhd.</p> <p>Free medical treatment and medication was provided for workers and their dependents by the clinic operated by Mill and Estate Health Medical Assistant. Free transport is provided for children to attend a local school. This was verified with the workers during interviews at sites and payment to the school bus driver.</p> <p>A Child Care Centre is available for children of staff and Workers called Creche provided for free for foreign worker’s children.</p> <p>The Humana School is operating in Asia Palm Oil Estate 2 and Melewar Estate Division 2 to support the worker’s children.</p> <p>Estate has conducted the weekly linesite inspection to the housing complex by Hospital Assistant. Seen the record updated per weekly basis with remarks in each unit.</p>	
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>Access to food for the workers are considered adequately and sufficiently provided through provision shops available in each estate and mill line site. Sighted canteens and shops at all estates and mill.</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>			

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Criterion / Indicator		Assessment Findings	Compliance
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	The policy for 'Social & Human Rights Policy' established on 15.01.2018 covering the respects the rights to associate and free to join union signed by Tay Chwee Leong (Mill Director) and Tee Swee Kee (Plantation Director).	Complied
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	Meetings between the management and workers representative were done through Joint Consultative Committee meeting (02.11.2018, 09.08.2018, 11.05.2018, 13.02.2018) for Asia POM, (31.10.2018, 25.07.2018, 28.04.2018, 30.01.2018) for Melewar Estate Division 2, (12.09.2018, 13.06.2018, 13.03.2018, 13.12.2017) for Asia Palm Oil Estate 2 and Hwa Li Estate Division 3 (24.09.2018, 25.06.2018, 05.03.2018, 14.12.2017).	Complied
Criterion 6.7: Children are not employed or exploited.			
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	<p>The minimum working age is 16 under the National Labour Law has been complied where a policy has been established i.e. 'Social & Human Rights Policy' established on 15.01.2018 signed by Tay Chwee Leong. Announcement made for the no hiring for children under 18 years old.</p> <p>For the estate, the policy dated 15/01/2018 signed by Plantation Director, Mr. Tee Swee Kee stated that protection of children, prohibition of child/minor labour.</p> <p>Malaysian workers have to provide ID card and foreign workers provided passports. Inspection of employment records confirmed checks are made of staff and worker age before hiring. During field visit, children were not seen at any of the working place at both mill and estates. Interview with workers confirmed the understanding of company policy on children workers.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
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.			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	The mill management has established an equal opportunities policy dated 01/07/2012 signed by Mill Director, Mr. Tay Chwee Leong and for the estate management, the policy dated 01/07/2012 signed by Plantation Director, Mr. Tee Swee Kee in both Malay and English languages.	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 -	No discrimination against on the benefits and job descriptions based on races, gender, caste, national origin and etc. All are treated equal and fair. They have the same basic daily wages, similar allowance given, same working hours and etc.	Complied
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 -	The company has established a 'Social & Human Rights Policy' established on 15/01/2018 signed by Tay Chwee Leong and for the estate management, the policy dated 15/01/2018 signed by Plantation Director, Mr. Tee Swee Kee which publicly available indicates that no discrimination being practice. Through interviewed with few workers, they understand about the equal opportunities and they explained that there is no discrimination happened on job distribution, benefits, wages and etc.	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 -	A policy has been established i.e. Sexual Harassment Policy and signed on 1/7/2012 by Mill Director, Mr. Tay Chwee Leong and for the estate management, the policy dated 1/7/2012 signed by Plantation Director, Mr. Tee Swee Kee. For mill, explanation of Policy of Sexual Harassment also given to workers on 04.07.2018, 12.07.2018 (Melewar Estate Division 2), 01.02.2018 (Asia Palm Oil Estate 2).	Complied

Criterion / Indicator		Assessment Findings	Compliance
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 -	Policy of Reproductive Rights Doc. no.: E/015/-02/2015 dated 08.09.2015 and 'Social & Human Rights Policy' established on 15.01.2018 including the respect and protect the reproductive rights. Gender committee meeting was planned to be conducted on six monthly bases. Selection of the committee is through election among workers. Latest meeting was done on 05.10.2018 and 10.04.2018 (Asia POM), 11.06.2018 & 11.12.2018 (Melewar Estate Division 2), 21.02.2018 & 21.08.2018 (Asia Palm Oil Estate 2) and 20.08.2018 & 11.02.2018 (Hwa Li Estate Division 3).	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 -	The SOP on Mechanism for the Prevention and Eradication of Sexual Harassment and Violence in the Workplace Doc No: E/003=01/2008 dated 01.10.08 is available during the audit and implemented. The SOP covering the guidelines for Handling Complaints on Sexual Harassment and explanation of Policy of Sexual Harassment also given to all 19 workers on 12.10.2018 (Asia POM), 11.12.2017 (Melewar Estate Division 2) and 21.02.2018 (Asia Palm Oil Estate 2).	Complied
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 -	Asia POM has established Sales and Purchase Agreement as the mechanism on FFB pricing. FFB pricing is based on Malaysian Palm Oil Board (MPOB) published prices updated regularly (monthly basis) and displayed at the weighbridge location. Asia POM maintains records of FFB prices, including the payment.	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 -	Pricing mechanism is under control of HQ, Account Department. FFB pricing is based on Malaysian Palm Oil Board (MPOB) published prices updated regularly (monthly basis) and displayed at the weighbridge location. MPOM maintains records of FFB prices, including the payment.	Complied

Criterion / Indicator		Assessment Findings	Compliance
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 -	<p>All parties having contractual agreements with operating units and had entered their contracts with adequate understanding of the terms and conditions set between both parties.</p> <p>On site stakeholder interviews and consultation carried out with the various contractors further confirmed their understanding of the contents of contracts entered. Seen the sampled agreement of contractors as below:</p> <ol style="list-style-type: none"> 1) CPO: Pengangkutan Dagang Tera Sdn Bhd dated 01.07.2017 valid for 3 years from the agreed date. 2) PK: Pengangkutan Dagang Tera Sdn Bhd dated 01.07.2017 valid for 3 years from the agreed date. 3) Melewar Estate Division 2: Mahee Trading, Tenancy Agreement dated 1.7.18 valid until 30.6.19. 4) Asia Palm Oil Estate 2: Chin Kui Min, Tenancy Agreement dated 01.07.2018 valid until 30.06.2019. 5) Hwa Li Estate Division 3: Chin Kui Min, Tenancy Agreement dated 01.01.2018 valid until 31.12.2018. 	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	<p>Review on payment records found all payment was made in timely manner. This was further verified during interviews with the respective stakeholders that were contractors, re-planters, transportations, spare-parts, hardware.</p> <p>Evidence was obtained during the review as below:</p> <ol style="list-style-type: none"> 1) Asia POM: The agreed price is RM32.20/MT. Perniagaan Dagang Tera, 19.09.2018 doc no: PV/1809-48 RM 40,346.11, cheque deposit Maybank. 2) Melewar Estate Division 2: Mahee Trading, Tenancy Agreement dated 1.7.18 valid until 30.6.19 for RM200.00/month with deposit of RM1100 as security, receipt number 600902 on 31.10.2018. 3) Asia Palm Oil Estate 2: Chin Kui Min, Tenancy Agreement dated 01.07.2018 valid until 30.06.2019 for RM200.00/month with deposit of RM1650 as security, receipt number RV1018-07 on 31.10.2018. 4) Hwa Li Estate Division 3: Chin Kui Min, Tenancy Agreement dated 01.01.2018 valid until 31.12.2018 for RM400.00/month with deposit of RM1100 as security, receipt number RV1018-04 on 30.10.2018. 	Complied
<p>Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.</p>			

Criterion / Indicator		Assessment Findings	Compliance
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	Contributions to local communities included: 1) Asia POM: Donation for safeguarding lives and health with love RM 800 on 25.09.2018, payment voucher no: BV0918-82. 2) Asia POM: Donation of RM 500 for Program Persatuan Ibumama & Guru Humana 2018 on 25.9.2018 3) Melewar Estate Division 2: Donation for program Kembara Rekreasi Tahun 6 2018, RM 800 on 25.09.2018. 4) Melewar Estate Division 2: Monthly school bus fees for locals school children (31.07.2018, 31.08.2018, 30.09.2018 and 31.10.2018). 5) Asia Palm Oil Estate 2: Request from workers from KJS Plantation to send their 5 children to Humana School at Asia Palm Oil Estate 2 on 07.09.2018. 6) Asia Palm Oil Estate 2: Request from SK Paris 3 on black soils for school garden on 03.9.2018 and estate already given 1 load of Hilux. 7) Hwa Li Estate Division 3: Allocation for HUMANA on 15.10.2018 RM 1250 8) Hwa Li Estate Division 3: Allocation for school bus transport from Hwa Li to SK/SMK Paris and SK/Tadika Sandau 30.10.2018 INV18100844 RM 1344.00	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 smallholders included within certified Asia POM complex.	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 -	Workers, staff and stakeholder interview confirm that there is no form of forced labour or trafficked labour in the operating units (Mills and estates). All employees have employment contract and paid to the agreed national minimum wages.	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	No contract substitution was noted. Seen the employment agreement, as well as interview during line site visit.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	Company has the Guidelines on terms 7 Conditions of Employment for Sabah Mill Workers, Ref No: E/013-03/2016 dated 23-11-16 stated the employment, contract agreement & minimum wages policy, wages and other employment benefits, pay slip, workers' deduction and recovery, workers' repatriation and worker's passport.	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 -	J.C.Chang Group-Asia Complex has the Social & Human Rights Policy' established on 15.01.2018 signed by Mill Director, Mr. Tay Chwee Leong and sighted the training attendance to all 181 workers on 01.11.17. For the estate management, Social & Human Rights Policy' established on 15/01/2018 signed by Tay Chwee Leong and for the estate management, the policy dated 15/01/2018 signed by Plantation Director, Mr. Tee Swee Kee and the briefing was done on 12.07.2018 (Asia POM) and on 01.2.2018 (Asia Palm Oil Estate 2).	Complied
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.	Asia POM complex certification unit has set up the HUMANA school within the estates compound for foreign workers children. Contribution to the HUMANA head office is sighted on monthly basis (15.07.18, 31.08.18, 15.09.18 and 15.10.18).	Complied

Criterion / Indicator	Assessment Findings	Compliance
Principle 7: Responsible development of new plantings		
Asia 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 annual surveillance 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.		

<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. <p>- Major compliance -</p>	<p>The mill and estate management has developed an improvement plan for FY2018-2019 which covered environmental aspects, water issues, pollution issues, social aspects, optimizing yield/ CPO issues and safety issues. Budget (OPEX and CAPEX) has been approved and the management will completed all the improvement plan by end of the financial year on June 2019. The detail sampling as per below:-</p> <p>The CIP for Asia Oil Mill is available for FY 2018-19 covered Environment, Social, Safety and Optimized Yield. Sampling on Social as per below detail:-</p> <table border="1" data-bbox="1032 687 1823 820"> <thead> <tr> <th>Aspect</th> <th>Descrip</th> <th>Budget</th> <th>Amount done todate.</th> </tr> </thead> <tbody> <tr> <td>Social</td> <td>Sundry Shop extension</td> <td>50,000</td> <td>32,000</td> </tr> </tbody> </table> <p>In Melewar 2 estate</p> <table border="1" data-bbox="1032 884 1823 1179"> <thead> <tr> <th>Aspect</th> <th>Descrip</th> <th>Budget</th> <th>Amount done todate.</th> </tr> </thead> <tbody> <tr> <td>Environment</td> <td>To reduce surface run off damage during rainy day</td> <td>21,159</td> <td>19,138.63</td> </tr> <tr> <td>Social</td> <td>Maintaining boundary condition between neighbouring</td> <td>6,196.44</td> <td>3,815.13</td> </tr> </tbody> </table> <p>Asia Oil Palm estate 2</p> <table border="1" data-bbox="1032 1214 1823 1375"> <thead> <tr> <th>Aspect</th> <th>Descrip</th> <th>Budget</th> <th>Amount done todate.</th> </tr> </thead> <tbody> <tr> <td>Social</td> <td>To give transport claim for School Bus</td> <td>9,096</td> <td>2,592</td> </tr> </tbody> </table>	Aspect	Descrip	Budget	Amount done todate.	Social	Sundry Shop extension	50,000	32,000	Aspect	Descrip	Budget	Amount done todate.	Environment	To reduce surface run off damage during rainy day	21,159	19,138.63	Social	Maintaining boundary condition between neighbouring	6,196.44	3,815.13	Aspect	Descrip	Budget	Amount done todate.	Social	To give transport claim for School Bus	9,096	2,592	<p>Complied</p>
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Criterion / Indicator		Assessment Findings				Compliance
		Safety	To add passengers trailer for workers	10,650	7,418	
		Hwa Li estate				
		Aspect	Descrip	Budget	Amount done todate.	
		Environment	To prevent Soil erosion and minatainance buffer area	20,745	1,783	
		Safety and Health	Provide staff and workers with medical expenses	90,225	29,206.19	

Appendix B: Approved Time Bound Plan

The Takon Production Unit is the last Unit to be certified under Carotino/ JC Chang Group. The Takon Palm Oil Mill and its FFB supplying plantations under the JC Chang group was seeking to be certified by April 2016. The Takon Production Unit comprises of 1 palm oil mill and 4 oil palm plantations located in the State of Sabah, Malaysia. However the following are some of the challenges raised for a deferment:

Reasons / Justification for deferring RSPO certification plan for Takon Production Unit.

1. The original proposed plan to certify Takon Production Unit in Sabah was somewhat over ambitious as it was based on the achievement of other Production Units where some basic preparatory works were started 2 to 3 years ahead of its pre and main assessments. The CB commented that the plan was challenging connotes that somewhat over-zealous on the plan proposed.
2. The overly long delay of more than a year by CB and RSPO Board to vet and re-vet Production Units' certification report and limited premium paid / uptake on certified products had created disappointment and a sense of uncertainty on the RSPO certification process and direction which somehow had affected the zest and drive to pursue vigorously on the preparatory works for Takon Production Unit in Sabah.
3. As Takon Production Units in Sabah have out-grower supply base, their reluctance and unpreparedness to embrace RSPO certification voluntarily has somewhat setback their pace to initiate the certification process as previously planned. More than 50% of FFB received are from outsider farm.
4. The pace of development for RSPO certification in Takon Production Unit was generally slowed by lack of personnel with the right knowledge, exposure and experience in the operating unit to stimulate RSPO enthusiasm and to spur the necessary trainings and other preparatory works.
5. By the process, plantation groups which have become member of RSPO should plan for certification soonest so as to demonstrate their sincerity for being a member and not to hitch a ride on the RSPO name. Hitherto, many large Malaysia plantation groups which have become member have yet to get any of their production units certified. As such, in all fairness and in the spirit of RSPO, it is pertinent to ponder whether this is more inappropriate and un-abiding that the deferment of the stated plans to certify Takon Production Unit in Sabah.

No.	Production Units	Location	Status	TBP	Remark
1	Asia Palm Oil Mill		Certified	Certified on 31/01/2013 Recertification completed in November 2017.	
	i) Melewar Estate 2	Lahad Datu, Sabah			
	ii) Hwa Li Estate 3	Lahad Datu, Sabah			
	iii) Asia Oil Palm Estate 2	Lahad Datu, Sabah			
2	Melewar Palm Oil Mill		Certified	Certified on 7/2/2014	
	i) Gerola Estate	Lahad Datu, Sabah			
	ii) Pahang Oil Palm Estate 2	Lahad Datu, Sabah			
	iii) Pahang Oil Palm Estate 3	Lahad Datu, Sabah			

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	iv) Melewar Estate 1	Lahad Datu, Sabah			
	v) Tye Yang Estate	Lahad Datu, Sabah			
3	Carotino Palm Oil Mill		Certified	Certified on 27/11/2010. Recertification completed in 2015	
	i) Maran Estate	Kuantan, Pahang			
	ii) Asia Oil Palm Estate	Kuantan, Pahang			
	iii) Hwa Li Estate 1	Segamat, Johor			
	iv) Hwa Li Estate 2	Segamat, Johor			
	v) Pahang Oil Palm Estate 1	Kuantan, Pahang			
4	Takon Palm Oil Mill		Pending main assessment	2018 (Exact period will depend on RSPO approval on the HCV disclosure)	<p>The last remaining production unit is pending for RSPO Main Assessment which is supposed to be completed in 2016. However, the assessment was deferred due to the withdrawal of SGS as certification body. Currently, the delay of Main Assessment is due to pending of approval on HCV Disclosure by RSPO. Updates on JC CHANG GROUP HCV compensation concept note</p> <p>i) On 22/9/2016, J C Chang Group submitted his "Reporting template for disclosure of areas cleared without prior HCV assessment since November 2005.</p> <p>ii) No social liability for the loss of HCVs 4, 5 and 6</p> <p>iii) Total 9.79ha of raw non-complaint land clearing are reported based on LUCA submitted.</p> <p>2). Disclosure template mentioned approved by RSPO and J C Chang Group follow up with RaCp Concept note and conservation plan</p> <p>3). Concept note approved by RSPO on area to area compensation (Muis Melewar</p>
	i) Pelita Estate	Lahad Datu, Sabah			
	ii) Muis Melewar Plantation 1	Tawau, Sabah			
	iii) Muis Melewar Plantation 2	Lahad Datu, Sabah			
	iv) Takon Estate	Lahad Datu, Sabah			

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					<p>Plantation 1 liability compensated under Asia Oil Palm Estate 1). However the concept of additionality and knowledge-based aspects are not fulfilled with HCV status and conservation plan is very basic 4). Conservation plan been improved and submitted but RSPO requested more or bigger plan for the submission on compensation plan under Annex 8</p> <p>5). On 23rd October 2017, we have engaged Wildasia to review of documents (HCV report, RSPO comments, RSPO compensation plan</p>
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Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2017 for Asia 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 Asia Palm Oil Mill and supply basFe are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.76
PK	0.76

Extraction	%
OER	19.77
KER	4.98

Production	t/yr
FFB Process	179,855.11
CPO Produced	35,556.736
PK Produced	8,950.064

Land Use	Ha
OP Planted Area	13,117.02
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	286.37
Total	13,403.39

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	79,544.05	0.52	1,957.40	0.23	-	-	81,501.45	0.75
CO ₂ Emission from fertilizer	4,830.09	0.03	409.93	0.05	-	-	5,240.02	0.08
NO ₂ Emission	6,963.75	0.04	330.84	0.04	-	-	7,294.59	0.08
Fuel Consumption	3,415.28	0.02	261.49	0.03	-	-	3,676.77	0.05
Peat Oxidation	0	0	0	0	-	-	0	0
Sink								
Crop Sequestration	-63,669.35	-0.42	-3,573.71	-0.39	-	-	-67,243.06	-0.81
Conservation Sequestration	-1,814.03	-0.01	-12.98	0	-	-	-1,827.01	-0.01

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Total	29,269.79	0.19	-627.03	-0.05	-	-	28,642.76	0.14
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*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	2,858.10	0.02
Fuel Consumption	1,325.65	0.01
Grid Electricity Utilization	1,077.72	0.01
Credit		
Export of Grid Electricity	-120.22	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	5,141.25	0.03

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	6,793.77
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 (%)	10
Divert to anaerobic diversion (%)	90

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	0
Divert to methane captured (flaring) (%)	5
Divert to methane captured (energy generation) (%)	95

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

5.1 Applicability of the general chain of custody requirements for the supply chain			
	Requirement	Evidence	Compliance (Yes / No or N/A) For any N/A raised, justification is required.
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.	Asia POM takes the legal ownership and physically handles RSPO certified and non-certified FFB from the estates and produce CPO and PK. The SOP for RSPO SCC Standard Mass Balance Calculation (Doc No:SC MBC-04/2018-AOM) dated 05 November 2018.	Yes
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.	Asia POM is not receiving the FFB from traders or distributor and itself not at trader or distributor, therefore no license required.	Yes
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 Carotino / JC Chang Group - Asia Production Unit: RSPO_PO1000000524	Yes
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.	Yes
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	The FFB suppliers are of consists of Asia certification unit, other certified JC Chang group estates and outside smallholders.	Yes

	only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.		
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Asia POM is only using the Mass Balance SCC Model.	Yes
5.3. Documented Procedures			
5.3.1	<p>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:</p> <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. 	<p>Procedure for supply chain has been established entitled SOP for RSPO SCC Standard Mass Balance Calculation (Doc No:SC MBC-04/2018-AOM) dated 05 November 2018. Among the subjects covered in the procedure are</p> <ul style="list-style-type: none"> • Mass Balance Calculation • Definition of the timeframe for balancing (period) • Quantity credit methodology • Definition of periodical boundary • Purchasing and goods in • Record Keeping • Sales and goods out • Outsourcing activities 	Yes
	<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). 	<p>Among the records included in the procedures are:</p> <ul style="list-style-type: none"> • Weighbridge tickets • Dispatch of CPO/PK – weighbridge ticket, delivery order, shipping document • Daily production report • Record and balance <p>All the records were found to be up-to-date.</p>	Yes
	<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. 	<p>There is appointment letter of Mr Ang Jen Ken (Mill Manager) as Sustainability Operation Manager for Asia POM dated 01.07.2018 and Mr. Mohd Jaini Bin Masri as person in charge on announcement of Palmtrace. Based on interview, the person in-charge was able to demonstrate the implementation of their procedures in accordance to the standard requirements.</p>	Yes

5.3.2	The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.	Based on the procedure, the internal audit shall be conducted in accordance to Internal Audit Procedure (T/001-03/2018) [rev. 3, dated 3/6/2018].	Yes
	ii) effectively implements and maintains the standard requirements within its organization	The internal audit for supply chain was conducted on 2/5/2018 – 4/5/2018 by Stearonthia Riting @ Sirin, Hasni Asis and Carl’s Ewis Julius. The audit was conducted in combination with RSPO P&C and MSPO. As a result of the audit, there were 7 NCR raised related to SC i.e. under clause 5.3.1, 5.4.1,5.4.2,5.6.1,5.7.2,5.8.1,5.11.1. The NCR based on verification of corrective action evidence, the NCRs have been satisfactorily closed out.	Yes
5.4. Purchasing and goods in			
5.4.1	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: <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; 	When FFB delivered to the mill from the estates, the transporters presented Delivery Note/Despatch Note to the mill weighbridge clerk in order the FFB to be received by the mill. E.g. of information available in the DO is as follows: 1. Non certified FFB (KJS Resources Sdn Bhd) <ul style="list-style-type: none"> • Quantity: 101 FFB • Date: 30.10.2018 • Particulars of goods: FFB • Year of planting: 1999 • Clone: FO • Block: B1-2 • Driver’s name: Muhd Fauzi Firdaus • Vehicle no: SD 5728 B • Ticket No: 21021 • RSPO Certificate: non-certified FFB 	Yes

	<ul style="list-style-type: none"> • A unique identification number 	<ul style="list-style-type: none"> • Certified FFB: (Pahang Oil Palm Estate 2) • Quantity: 7510 kg • Date: 30.10.2018 • Particulars of goods: loose fruit • Seal No: 073398 • Driver's name: Anwar bin Patampa • Vehicle no: POP 2 (by lorry) • Ticket No: FFB18007841W • RSPO Certificate: RSPO 651276 expiry date: 06/02/2019 <p>E.g. of information available in the mill's weighbridge tickets is as follows:</p> <ol style="list-style-type: none"> 1. Non certified FFB (KJS Resources Sdn Bhd) <ul style="list-style-type: none"> • Weighbridge ticket no: FFB18016879W • Name of estates: KJS Resources Sdn Bhd • DO No: 21021 • Seal No: 015830 • Name of driver: Mohd Fauzi bin Firdaus • Vehicle no: SD 5728 B • Date & time in/out: 15:07:43/15:16:04 • Total bunches: 101 bunches • Nett weight: 2.04 MT 1. Certified FFB: (Pahang Oil Palm Estate 2) <ul style="list-style-type: none"> • Weighbridge ticket no: FFB18016907W • Name of estates: Pahang Oil Palm Estate 2 (POP2) • DO No: 07641POP2 • Seal No: 073398 • Name of driver: Anwar bin Patampa • Date & time in/out: 17:46:07/17:53:38 • Total bunches: 7600 kg loose fruit 	
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		<ul style="list-style-type: none"> • Nett weight: 7.60 MT 	
	<ul style="list-style-type: none"> • Information shall be completed 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>The information was available in various documents such as delivery order (estate’s weighbridge tickets), consignment note and mill weighbridge tickets.</p> <p>Sampled: FFB delivery from POP2-Pahang Oil Palm Estate 2, Loose Fruit bag: 229 bags/7510 kg ticket no: FFB18007841W dated 30.10.2018, seal No 073398 and mill’s receiving slip, ticket no: FFB18016907w dated 30.10.2018, 7,600 kg (mill’s weight).</p>	Yes
	<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. 	Not applicable. The mill is not required to make announcement for its receipt of FFB.	N/A
	<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 (www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements. 	The mill has a list of certified and non-certified FFB suppliers which has the information about certificate number and validity period. There are 5 RSPO certified and 8 RSPO non certified suppliers. Asia POM will do the RSPO certified validity checking through RSPO website and also Palmtrace shipping announcement.	Yes
	<ul style="list-style-type: none"> • The validity of licence 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. 	NA – the mill does not purchase FFB from any trader.	N/A

5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	Asia POM has the Mechanism for Handling Non-Conforming Oil Palm Products And/Or Documents, Doc Ref: SC/MEC-04/2018-AOM dated 05.11.2018.	Yes
5.5. Outsourcing activities			
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>	Outsourced activity is only limited to CPO transportation. There is no outsource for processing activities. Ref.: Contract Agreement between Asia POM and Pengangkutan Dagang Tera Sdn Bhd (CPO transporter), validity: 1/7/2017 to 1/7/2020. During the stakeholder’s consultation, Pengangkutan Dagang Tera Sdn Bhd has involved on 19.09.2018 and company has communicate the RSPO standard to them.	Yes
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>	Not applicable. No outsourced activity for processing.	N/A
	<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.</p>	Not applicable. No outsourced activity for processing.	N/A

	c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.	Not applicable. No outsourced activity for processing.	N/A
	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. No outsourced activity for processing.	N/A
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. No outsourced activity for processing.	N/A
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. No outsourced activity for processing.	N/A
5.6. Sales and goods out			
5.6.1	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available 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; 	<p>Asia POM ensured the required information is available in document form. Sampled contract: AOP/A0355/12/17 (quantity: 1,700 mt of CSPO) and AOP/2366/01/18 (quantity: 600 mt of CSPK)</p> <ul style="list-style-type: none"> The name and address of the buyer; XXXX The name and address of the seller; Asia Oil Palm Sdn Bhd, Unit 30-02. Mail Box No. 288, Menara Landmark No. 12, Jln Ngee Heng, 80000 Johor Bahru, Johor The loading or shipment/ delivery date; e.g. 18/1/2018 The date on which the documents were issued; e.g. 20/1/2018 A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); 	Yes

	<ul style="list-style-type: none"> Supply chain certificate number of the seller; A unique identification number 	<p>e.g. RSPO Sustainable Palm Kernel (MB) or RSPO Sustainable CPO (MB)</p> <ul style="list-style-type: none"> The quantity of the products delivered; e.g. 336.88 mt Any related transport documentation; e.g. Despatch note no. PKRS18000013W Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 651278 A unique identification number - Available in a few forms e.g. DN no., seal no., etc. 	
	<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 is complete and available in various documents such as sales contract, mill weighbridge ticket and delivery note.	Yes
	<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. 	Verification of transaction summary extracted from PalmTrace confirmed that all announcements for CSPO and CSPK were in order.	Yes
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. 	The registration of PalmTrace is carried out by Carotino Sdn Bhd, Pasir Gudang, Johor. All transaction will be registered in the PalmTrace.	Yes
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products 	Based on the announcement summary, all the registrations were found to be in order.	Yes

	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.		
	<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. 	Not applicable. Products are not sold beyond refinery.	Yes
	<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. 	Based on the MB accounting, the removal of volumes was done correctly when the products were sold as conventional or other scheme (e.g. ISCC).	Yes
	<ul style="list-style-type: none"> Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 	Based on the announcement summary, all the confirmations were found to be in order.	Yes
5.8. Training			
5.8.1	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.	Training plan for 2017-2019 were available which training for RSPO Supply Chain has been conducted individually by critical control point category.	Yes
5.8.2	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.	Annual Training was conducted yearly by Head of Department respectively as per 3 years training plan. Attendance record was available for verification.	Yes
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.	All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date and accessible.	Yes

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.	As spelt out in its supply chain procedure, Clause 5.4, records are to be maintained minimum of seven years in archive room.	Yes
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.	Not applicable. The product of the facility is containing 100% palm oil.	Yes
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 Oleochemicals and its Derivaties. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.	As per SOP for RSPO SCC Standard Mass Balance Calculation dated 05.11.2018, Conversion factor of CPO and PK production is defined by below formula: $P(\%) = O/I*100$ P: Conversion Factor/% OER or % KER I: Amount of the process input material/FFB O: Amount of output yielded/CPO or PK	Yes
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	The facility is updating the actual rate in monthly based on own estate theoretical extraction ratio table for fiscal year 2018 version 2 as per RSPO SCC Standard Mass Balance Calculation dated 05.11.2018.cx	Yes
5.11. Claims			
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.	No claims were made regarding the use of or support of or support of RSPO certified oil palm products.	Yes
5.12. Complaints			

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5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	Asia POM has the SOP on Mechanism for Complaints and Grievances Doc no: E/001-06/2017 Doc date: 06-01-2017 however, so far no complaint has been received. There were 4 levels of complaint procedure with deadline of 10 days, 7 days, 5 days and 5 days based on complaint solution levels.	Yes
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 Management review under Doc ref no. T/001-03/2018 dated 3 June 2018 Management review at the mill level was last conducted on 6/8/2018. It was chaired by En Lee Min Khin and attended by 13 mill staff which include AMs, Head of AP, office clerk, lab supervisor, quality supervisor and mill supervisor.	Yes
5.13.2	The input to management review shall include information on: <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. 	Verification of the minutes of meetings showed that all of the required agenda have been adequately discussed. Such as for customer feedback there is no customer feedback for Asia Palm Oil Mill, and also no changes that effect the management system.	Yes
5.13.3	The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	Discussion about the improvement of the effectiveness of the management system and its processes, and any resource needs were found to be included in the meeting minute. To improve the management system OU will give training to weighbridge operator, appoint PIC and give training to CCP for new requirement.	Yes

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.	Not applicable.	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.rspo.org) 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. 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.	NA	N/A
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.	NA	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.	NA	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.	NA	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.	NA	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.	NA	N/A
5.3	<p>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:</p> <ul style="list-style-type: none"> 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. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2. 	NA	N/A
5.4	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.	NA	N/A

	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.		
Business to consumer communication			
6.1	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.	N/A	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.	N/A	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.	N/A	N/A
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	N/A	N/A
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	N/A	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.	N/A	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.	N/A	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 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 .	NA	N/A
MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES			
Certified oil palm content (IP)			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	NA	N/A
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	NA	N/A

	<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>	NA	N/A
Labelling and trademark (IP)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <p>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>	NA	N/A
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 	NA	N/A

	<ul style="list-style-type: none"> • 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 <p>References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.</p>		
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content (MB)			
	95% or above of the oil palm content must be RSPO MB-certified.	NA	N/A
	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 non-certified volume must be covered by equivalent volume of RSPO Credits.	NA	N/A
Labelling and trademark (MB)			
	<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 	NA	N/A

	<p>the certified material; some or all of it may reside in a product that does not carry a claim.</p> <ul style="list-style-type: none"> • 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). <p>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>		
Messaging (MB)			
	<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 supply chain. • 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. <p>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>	NA	N/A
	<p>Messaging NOT ALLOWED in storytelling in product-related communications:</p>	NA	N/A

	Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.		
MODULE C – PARTIAL PRODUCT CLAIMS			
	<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'. <p>The use of the RSPO label with this claim is mandatory and must include the tag '50% MIXED'. No other percentage is allowable within this claim.</p>	NA	N/A
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:	NA	N/A

	<p>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</p>		
	<p>Where one supply chain model accounts for 95% of the oil palm content, the claim for this specific model may be made:</p> <p>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</p>	<p>NA</p>	<p>N/A</p>

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

E.1 Definition			
	Requirement	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)
E.1.1	<p>Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Asia POM receives and process both 80% certified and 20% non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified Products.</p>	<p>Yes</p>
E.2 Explanation			
E.2.1	<p>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</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>	<p>Yes</p>

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	report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.		
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).	Company has registered their mill in the PalmTrace:- Members ID – Asia Production Unit: RSPO_PO1000000524 Licence valid until 30/1/2019 Member category : Oil Mill	Yes
E.3 Documented procedures			
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: a. Complete and up to date procedures covering the implementation of all the elements in these requirements;	Procedure for supply chain has been established entitled SOP for RSPO SCC Standard Mass Balance Calculation (Doc No:SC MBC-04/2018-AOM) dated 05 November 2018. Among the subjects covered in the procedure are <ul style="list-style-type: none"> • Mass Balance Calculation • Definition of the timeframe for balancing (period) • Quantity credit methodology • Definition of periodical boundary • Purchasing and goods in • Record Keeping • Sales and goods out • Outsourcing activities 	Yes
	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.	There is appointment letter of Mr Ang Jen Ken (Mill Manager) as Sustainability Operation Manager for Asia POM dated 01.07.2018 and Mr. Mohd Jaini Bin Masri as person in charge on announcement of Palmtrace. Based on interview, the person in-charge was able to demonstrate the implementation	Yes

		of their procedures in accordance to the standard requirements.	
E.3.2	The site shall have documented procedures for receiving and processing certifies an non-certified FFBS.	Asia Palm Oil mill has documented procedures (as mentioned above in E 3.1) for the incoming FFB, processing and outgoing palm products (CPO and PK). The procedure covers receiving and processing certified and non-certified FFBS.	Yes
E.4 Purchasing and goods in			
E.4.1	The site shall verify and document the volumes of certified and non-certified FFBS received.	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit. Asia POM has the system to verify at the weighbridge.</p> <p>When FFB delivered to the mill from the estates, the transporters presented Delivery Order (DO) and in some cases, estate's weighbridge tickets to the mill weighbridge clerk in order the FFB to be received by the mill.</p> <p>E.g. of information available in the dispatch tickets is as follows:</p> <ul style="list-style-type: none"> • FFB Dispatch Chit No. • Estate's names • Date & time of delivery • Field No. • No. of bunches • Vehicle no. <p>E.g. of information available in the estate's weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> • Name of estates 	Yes

		<ul style="list-style-type: none"> • Field No. • Name of transporter company • Name of driver • Vehicle no. • Weighbridge ticket no. • Date & time of delivery • Total bunches • Net weight 	
E.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	There was no overproduction projected. Nonetheless, the facility is aware to this requirement.	Yes
E.5 Record keeping			
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 real-time basis and / or three-monthly basis by RSPO.	The record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK was recorded in "Mass Balance Calculation". Information available in the format is date, FFB processed, OER and CPO amount [opening, produced and closing] and portions of certified & non-certified material and products. The accounting was of three monthly basis.	Yes
	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	The mill is using actual OER and KER for its conversion ratio for CPO and PK. Based on the "Mass Balance Calculation" sheet, the deduction of both CPO and PK stocks were made correctly.	Yes
	c. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.) For further details refer to Module C.	There has been no case of short sales. Verification of the mass balance accounting showed that all deliveries were made from positive stock.	Yes
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	No outsourcing activities.	N/A

	mill has to ensure that the crush is covered through a signed and enforceable agreement		
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Supply Chain Declaration *(Applicable For Appendix E)*

A. Monthly Records of Certified and Uncertified FFB Received since the last audit (Nov 17 – Oct 18)				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	Nov 17	14,727.95	1,797.76	16,525.71
2	Dec 17	16,894.97	1,773.33	18,668.30
3	Jan 18	15,955.50	1,706.68	17,662.18
4	Feb 18	13,641.09	1,516.67	15,157.76
5	Mar 18	14,409.81	1,665.52	16,075.33
6	Apr 18	13,451.490	1,864.26	15,315.75
7	May 18	6,883.550	833.59	7,717.14
8	Jun 18	11,165.250	1,486.44	12,651.69
9	Jul 18	8,978.270	1,158.11	10,136.38
10	Aug 18	7,864.790	965.83	8,830.62
11	Sep 18	12,102.430	1,192.89	13,295.32
12	Oct 18	14,132.910	1,342.22	15,475.13
	TOTAL	150,208.01	17,303.30	167,511.31
Note:				

B. Monthly Records of Certified CPO & PK since the last audit (Nov 17 – Oct 18)			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Nov 17	2,929.64	737.81
2	Dec 17	3,410.01	810.07
3	Jan 18	3,003.15	784.78
4	Feb 18	2,757.28	715.21
5	Mar 18	2,855.26	729.55
6	Apr 18	2,697.83	614.29
7	May 18	1,363.81	349.84
8	Jun 18	2,268.93	576.94
9	Jul 18	1,776.62	398.59
10	Aug 18	1,478.33	339.65

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11	Sep 18		2,468.55	546.10
12	Oct 18		2,835.42	666.18
	TOTAL		29,844.83	7,269.01
Note:				

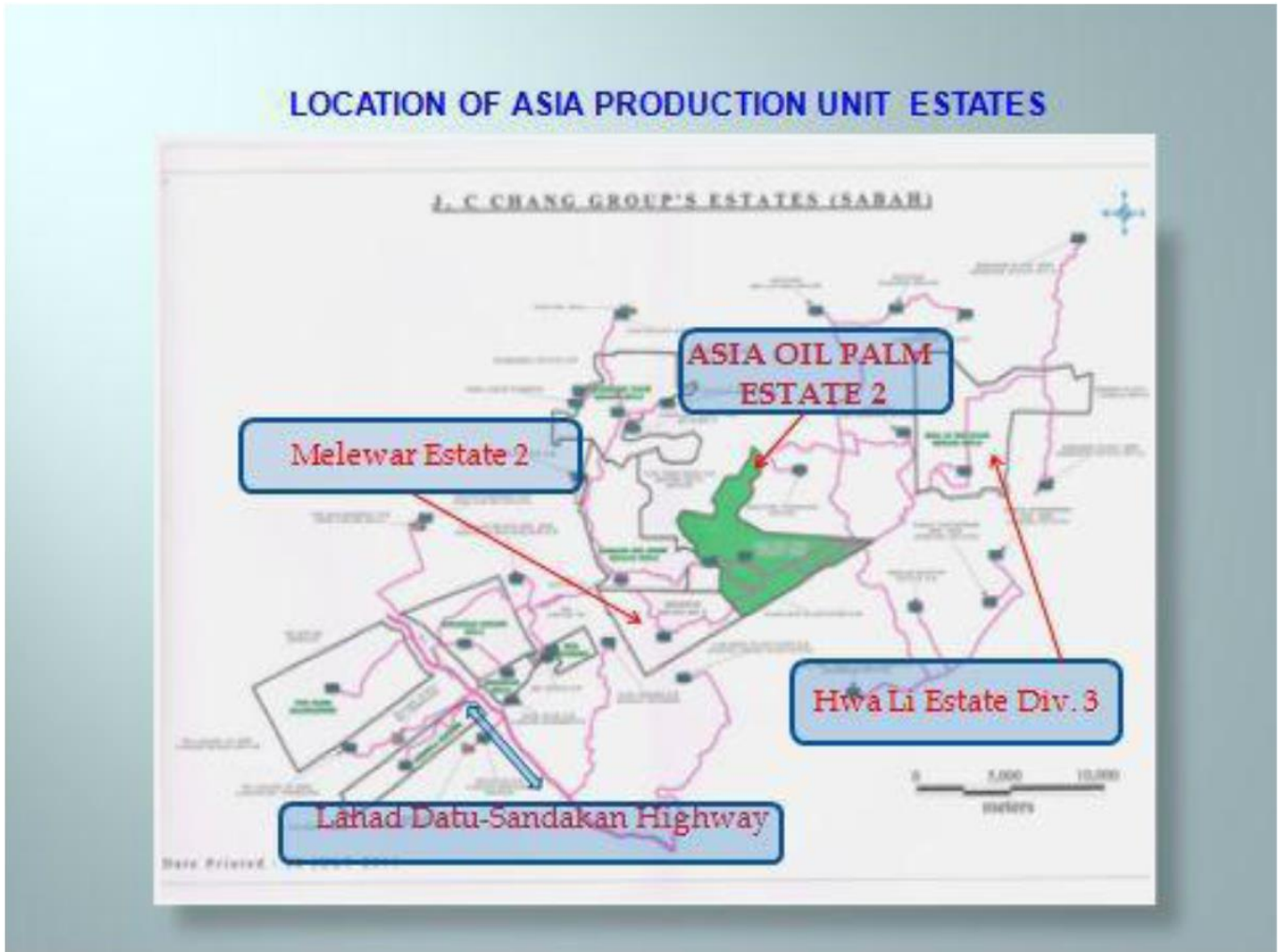
C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any) (Nov 17 – Oct 18)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	Buyer 1	CB66875	5794.110	
2	Buyer 2	CB66875		6558.110
Note:				

D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any) (Nov 17 – Oct 18)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	Buyer 3	ISCC	20818.690	-
Note:				

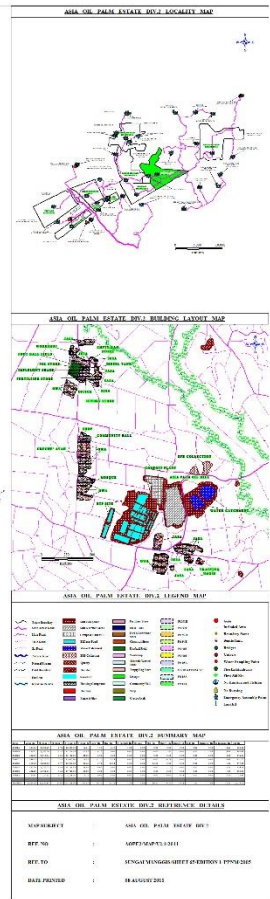
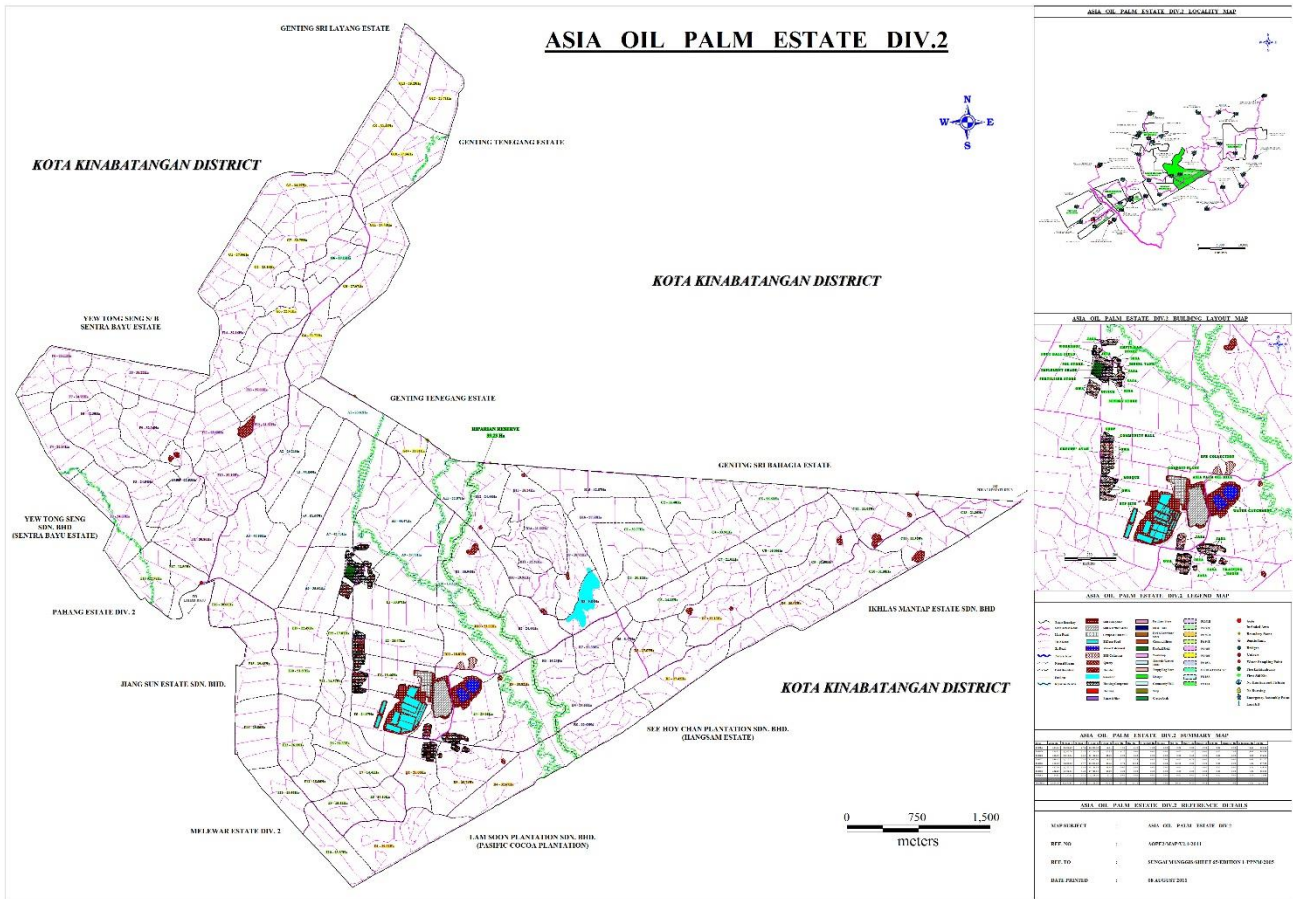
E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any) (Nov 17 – Oct 18)				
No.	Buyers Name		CPO Sold (mt)	PK Sold (mt)
1	Buyer 1		5643.950	
2	Buyer 2			1542.47
Note:				

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:			

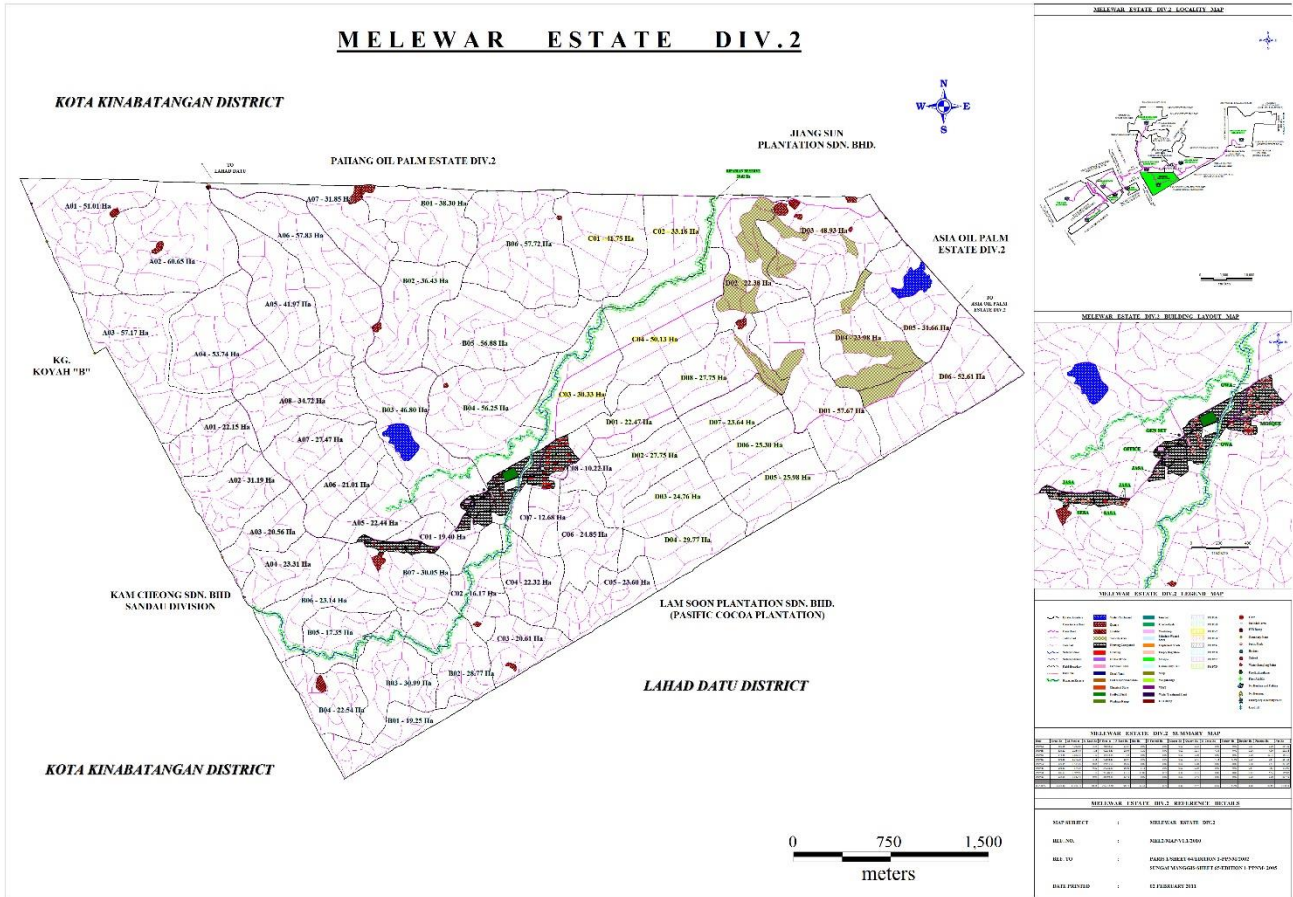
Appendix F: Location Map of Asia Palm Oil Mill Certification Unit and Supply bases



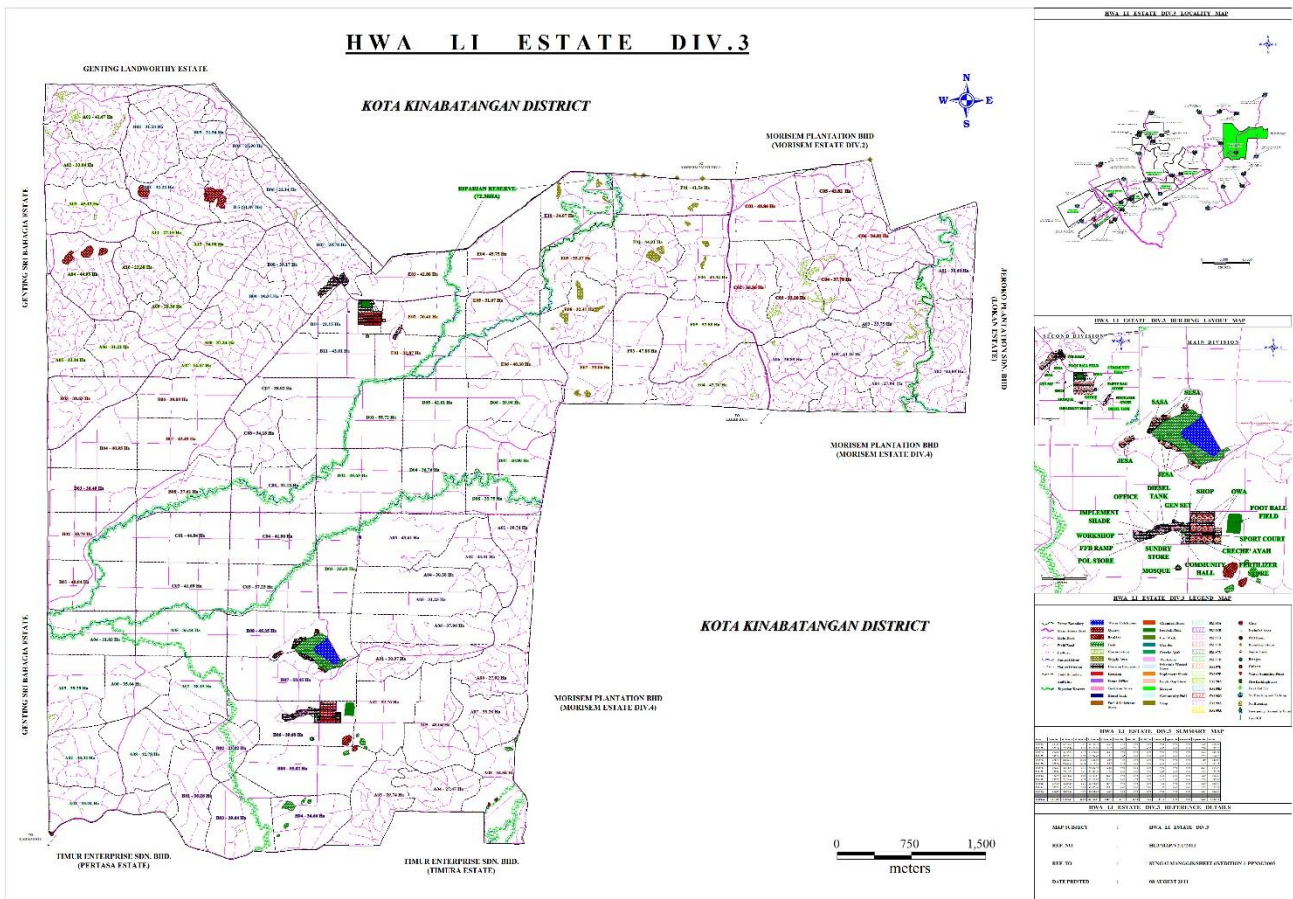
Appendix G: Asia Oil Palm Estate Div. 2 Field Map



Appendix H: Melewar Estate Div 2 Field Map



Appendix I: Hwa Li Estate Div. 3 Field Map



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

Not applicable.

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
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