

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (2_1)**
- Recertification Assessment** (Choose an item.)
- Extension of Scope**

Client Company name (Parent Company): 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: Carotino Palm Oil Mill (Carotino Production Unit)
Location of Certification Unit: PT 116, Lot No. 3840, Mukim Ulu Lepar 26500 Kuantan, Pahang, Malaysia
Date of Final Report: 1/6/2021

TABLE of CONTENTS

Page No

Section 1: Scope of the Certification Assessment.....	4
1. Company Details	4
2. Certification Information	4
3. Other Certifications.....	5
4. Location(s) of Mill & Supply Bases	5
5. Description of Supply Base	6
6. Plantings & Cycle.....	6
7. Certified Tonnage of FFB (Own Certified Scope)	7
8. Certified Tonnage of FFB (from other certified unit(s)).....	7
9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)	8
10. Certified Tonnage	8
11. Actual Sold Volume (CPO)	8
12. Actual Sold Volume (PK)	9
13. Independent Smallholders Certification Claims.....	9
Section 2: Assessment Process	10
2.1 Assessment Methodology, Programme, Site Visits.....	10
2.2 BSI Assessment Team:	12
2.3 Assessment Plan	13
Section 3: Assessment Findings	15
3.1 Normative requirement applied for this assessment:	15
3.2 Multiple Management Units and Time Bound Plan.....	15
3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment)	16
3.4 Details of Nonconformities	18
3.4.1 Status of Nonconformities Previously Identified and Observations.....	22
3.4.2 Summary of the Nonconformities and Status.....	27
3.5 Stakeholders and previous land owner / user consultation.....	28
3.6 Impartiality and conflict of interest	30
Formal Signing-off of Assessment Conclusion and Recommendation.....	31
Appendix A: Summary of Findings <i>include the appropriate checklist used for assessment</i>	32
Appendix B: Approved Time Bound Plan.....	118
Appendix C: GHG Reporting Executive Summary	119

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

Appendix D: Supply Chain Declaration.....121
Appendix E: Location Map of Certification Unit and Supply bases.....123
Appendix F: Estate Field Map124
Appendix G: List of Smallholder Sampled.....126
Appendix H: List of Abbreviations127

Section 1: Scope of the Certification Assessment

1. Company Details			
Parent Company	Carotino / JC Chang Group		
RSPO Membership Number	2-0029-06-000-00	Membership Approval Date	10/05/2006
Address	Unit 30-01, Level 30, Menara Landmark, No. 12, Jalan Ngee Heng 80000 Johor Bahru, Johor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Carotino Sdn. Bhd. (Carotino Production Unit)		
Location / Address	PT116, Lot 3840, Mukim Ulu Lepar, 26500 Kuantan, Pahang, Malaysia.		
Website	www.carotino.com		
Management Representative	Mr Seow Chee Chiang	E-mail	seowcc@jcc.com.my
Telephone	+607 2231633 (Head Office) +607-223 1633 (Mill)	Facsimile	+607 224 1546 (Head Office) +607-223 1546 (Mill)

2. Certification Information			
Certificate Number	RSPO 649410	Date of First Certification	27/04/2010
		Certificate Start Date	27/04/2020
		Certificate Expiry Date	26/04/2025
Scope of Certification	Palm Oil and Palm Kernel Production		
Visit Objectives	1) Determination of the conformity of the client's management system, or parts of it, with audit criteria. 2) Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.		
Assessment Cycle	<input type="checkbox"/> Initial Assessment <input type="checkbox"/> Recertification Assessment (Choose an item.) <input checked="" type="checkbox"/> Annual Surveillance Assessment (RA 2 ; ASA 1) <input type="checkbox"/> Scope Extension		
Applicable Standards	<input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil <input type="checkbox"/> Group Certification 2016 <input type="checkbox"/> RSPO Independent Smallholders Standard 2019		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved <input type="checkbox"/> Mass Balance		

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
500450685 MSPO	MS2530-3:2013 MSPO Part 3: General Principles for Oil Palm Plantations and Organized Smallholders & MS2530-4:2013 MSPO Part 4: General Principles for Palm Oil Mills	DQS Certification (M) Sdn Bhd	08/10/2025
EU-ISCC-Cert-US201-70600811	ISCC	SCS global services	04/10/2021

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Carotino Palm Oil Mill	PT 116, Lot No. 3840, Mukim Ulu Lepar 26500 Kuantan, Pahang	3° 48' 35.70" N	102° 49' 15.60" E
Asia Oil Palm Estate 1	PT116, LOT 3840, Mukim Ulu Lepar, 26500 Kuantan, Pahang	3° 49' 40.30" N	102° 47' 50.00" E
Hwa Li Estate 1	LOT 51, 52, 53, 54, 55, 56, 415, 406, 513, 523, 524 ,317, 318, Mukim Keratong-Rompin, Pahang	2° 44' 40.74" N	103°01' 59.41" E
Hwa Li Estate 2	Lot 2389,Mukim Bera, Bera, Pahang	2° 50' 43.25" N	102° 43' 29.21" E
Maran Estate	Lot 929, 6460, 245, 351, 957, 930, Mukim Lepar, Kuantan, Pahang	3° 44' 31.28" N	102° 50' 42.93" E
Pahang Oil Palm Estate 1	Lot No 23604, 23605, 23600, 23601, 23602, 23603, 23606, 23607, & 23608, Mukim Ulu Lepar-Kuantan Pahang	3° 49' 40.30" N	102° 47' 50.00" 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	1,948.71		218.71	2,167.42	89.91
Hwa Li Estate 1	1,929.74		227.66	2,157.40	89.45
Hwa Li Estate 2	1,509.09		150.12	1,659.21	90.95
Maran Estate	1,786.27		354.55	2,140.82	83.44
Pahang Oil Palm Estate 1	1,835.21		317.89	2,153.10	85.24
Total	9,009.02	-	1,268.93	10,277.95	87.65

6. Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Asia Oil Palm Estate	-	137.50	995.40	815.81	-	1,948.71	-
Hwa Li Estate 1	-	435.89	1,051.66	442.19	-	1,929.74	-
Hwa Li Estate 2	277.89	482.51	-	-	748.69	1,231.20	277.89
Maran Estate	193.72	898.73	693.82	-	-	1,592.55	193.72
Pahang Oil Palm Estate 1		112.84	1,414.52	307.85	-	1,835.21	-
Total (ha)	471.61	2,067.47	4,155.40	1,565.85	748.69	8,537.41	471.61

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

7. Certified Tonnage of FFB (Own Certified Scope)				
Estate	Tonnage / year			
	Estimated (Apr 2020 – Mar 2021)	Actual (Jan 2020 – Dec 2020)		Forecast (Apr 2021 – Mar 2022)
		<i>Previous license period (Jan 2020 – Mar 2020)</i>	<i>Current license period (Apr 2020 – Dec 2020)</i>	
Asia Oil Palm Estate	52,971.32	9,357.33	41,963.98	44,407.12
Hwa Li Estate 1	21,267.89	2,552.52	13,751.08	18,088.24
Hwa Li Estate 2	23,784.36	2,494.42	6,260.78	10,948.03
Maran Estate	41,685.66	6,924.59	31,921.40	30,997.21
Pahang Oil Palm Estate 1	51,356.70	8,385.72	38,872.25	40,040.96
Total	191,065.93	162,484.07		144,481.56

8. Certified Tonnage of FFB (from other certified unit(s))				
Estate	Tonnage / year			
	Estimated (Apr 2020 – Mar 2021)	Actual (Jan 2020 – Dec 2020)		Forecast (Apr 2021 – Mar 2022)
		<i>Previous license period (Jan 2020 – Mar 2020)</i>	<i>Current license period (Apr 2020 – Dec 2020)</i>	
Nil	N/A			N/A
Total				

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Independent FFB Supplier	Tonnage / year			
	Estimated (Apr 2020 – Mar 2021)	Actual (Jan 2020 – Dec 2020)		Forecast (Apr 2021 – Mar 2022)
		Previous license period (Jan 2020 – Mar 2020)	Current license period (Apr 2020 – Dec 2020)	
Nil				
Total				

10. Certified Tonnage				
Mill Capacity: 60 MT/hr	Estimated (Apr 2020 – Mar 2021)	Actual (Jan 2020 – Dec 2020)		Forecast (Apr 2021 – Mar 2022)
		Previous license period (Jan 2020 – Mar 2020)	Current license period (Apr 2020 – Dec 2020)	
		FFB	FFB	
	191,065.93	29,714.58	132,769.49	144,481.56
		162,484.07		
	CPO (OER: 20.70%)	CPO (OER: 20.39%)		CPO (OER: 20.61%)
	39,541.18	6,138.17	26,988.65	29,777.97
		33,126.82		
	PK (KER: 5.12%)	PK (KER: 4.62%)		PK (KER: 5.06%)
	9,784.31	1,442.07	6,064.16	7,306.45
		7,506.23		

11. Actual Sold Volume (CPO)					
Current License period (Jan 2020 – Mar 2020)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	3,725.48	2,265.77	-	-	5,991.25
Previous License period (Apr 2020 – Dec 2020)					
CPO (MT)	25,173.69	1,145.33	-	798.77	27,117.79
Total	28,899.17	3,411.10		798.77	33,109.04

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

12. Actual Sold Volume (PK)					
Current License period (Jan 2020 – Mar 2020)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
PK (MT)	1,137.52	-	-	257.21	1,394.73
Previous License period (Apr 2020 – Dec 2020)					
PK (MT)	5,637.94	-	-	298.52	5,936.46
Total	6,775.46			555.73	7,331.19

13. Independent Smallholders 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)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639
Representative: Nicholas Cheong (Nicholas.Cheong@bsigroup.com)
Website: www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 84,000 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.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 20-22/01/2021. The audit programme is included as Section 2.3.

The approach to the audit was to treat the mill and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety.

The Critical NC close out assessment was conducted on 25/02/2021. The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criteria Malaysia National Interpretation 2019 for the Production of Sustainable Palm Oil was used to guide the assessment of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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 (and 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 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

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.5.

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

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

For Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re-certification)	Year 2 (ASA2_1)	Year 3 (ASA2_2)	Year 4 (ASA2_3)	Year 5 (ASA2_4)
Carotino Palm Oil Mill	✓	✓	✓	✓	✓
Asia Oil Palm Estate 1		✓		✓	
Hwa Li Estate 1	✓			✓	
Hwa Li Estate 2	✓		✓		
Maran Estate		✓			✓
Pahang Oil Palm Estate 1			✓		✓

Tentative Date of Next Visit: January 17, 2022 - January 19, 2022

Total No. of Mandays: 9.0

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

2.2 BSI Assessment Team:

Team Member Names	Role	Qualifications <i>(Short description of the team members)</i>
Valence Shem (VSH)	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, MSPO 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, MSPO Awareness Training in 2014 and ISO 45000 Lead Auditor Course in 2019. During this assessment, he covers the aspects on legal requirements, environment, supply chain and HCV. Able to communicate in Bahasa Malaysia and English.
Hafriazhar Mohd Mokhtar (HMM)	Team Member	Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO P&C and SCCS standards and recently completed his RSPO P&C Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea, Solomon Islands and Gabon. During assessment, he covered the legal issues, social issues, worker’s welfare and stakeholder consultation. He is fluent in Bahasa Malaysia and English languages
Vijay Kanna Pakirisamy (VKP)	Team Member	He holds a bachelor’s degree in Agribusiness Science Management with Honours from University Utara Malaysia in 2010. He gained his working exposure in the plantation sector, serving as an Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad. Throughout his 10 year tenure in the oil palm industry, he has been part of the operations team that implements standards within the estate such as RSPO, MSPO, ISCC and FINWATCH. He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in November 2019, endorsed RSPO P&C Lead Auditor Course in October 2019 and endorsed MSPO Lead Auditor Course in November 2019. During this assessment, he assessed on the aspects of Occupational, Health & Safety and estate best practises. He is fluent in Bahasa Malaysia and English languages.

Accompanying Persons:

Name	Role
Nicholas Cheong	Observer

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

2.3 Assessment Plan

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

Date	Time	Subjects	VSH	HMM	VKP
Wednesday 20/01/2021	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) 	✓	✓	✓
	0900-1300	Maran Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc.	✓	✓	✓
	1300-1400	Lunch break			
	1400-1630	Maran Estate Document review P1 – P7: (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 21/01/2021	0900-1300	Carotino 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, supply chain related, etc.	✓	✓	✓
	1000-1300	Stakeholder consultations: Consultation with relevant stakeholders 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.	-	✓	-
	1300-1400	Lunch break			
	1400-1630	Carotino POM Document Review P1 – P7: 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, supply chain etc.	✓	✓	✓
	1630-1700	Interim closing briefing			
Friday 22/01/2021	0900-1230	Asia Oil Palm Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc.	✓	✓	✓

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	1230-1430	Lunch break & Friday prayer			
	1430-1600	Asia Oil Palm Estate Document review P1 – P7: (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	Audit team discussion & preparation for closing meeting	✓	✓	✓
	1630-1700	Closing meeting	✓	✓	✓

Remote Critical NC close out assessment plan:

Date	Time	Subjects	VSH
Thursday 25/2/2021	1000-1015	Opening briefing by the audit team leader	✓
	1015-1115	Carotino POM Verification of effective implementation of corrective actions for NCR #2014302-202101-M1 <ul style="list-style-type: none"> • Site visit at the IPA & Hexane store 	✓
	1130-1300	Maran Estate Verification of effective implementation of corrective actions for NCR #2014302-202101-M2: <ul style="list-style-type: none"> • Interview with the trained manuring workers • Site visit at the riparian zone pegging 	✓

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- Carotino/JC Chang Group Multiple Management Units / Time Bound Plan
- RSPO Principle and Criteria (P&C) 2018 for the Production of Sustainable Palm Oil
- RSPO Group Certification Standard 2016
- Malaysia National Interpretation 2019 for RSPO P&C 2018
- Independent Smallholder Standard 2019

3.2 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?	Yes. It includes Melewar Production Unit, Asia Production Unit, Carotino Production Unit and Takon Production Unit. Please refer to appendix B for details on the mills and estates of Carotino/JC Chang Group.	Complied
Have all the estates and mills certified within five years after obtaining RSPO membership?	Yes. The Group target to achieve 100% RSPO certification for all Operating Units under the management of JC Chang Group by end of 2019. The last Production Unit namely Takon Production Unit have been scheduled for RSPO main assessment from 9/3-13/3/2020. The RSPO assessment done and resulted positive, RSPO certificate was issued for Takon Production Unit on 8/5/2020 but it was withdrawn by BSI as RSPO refused to give approval as the RaCP plan yet to be approved by RSPO. RSPO agreed to hold Takon's assessment result till 01/11/2020 but unfortunately, the group can't obtain approval from RSPO on RaCP plan before the expiry date. The RaCP plan was submitted and rejected by RSPO on 28/08/2020, the group are in the progress to ratify all comments pointed. The plan of 100% RSPO certification to be postponed to year 2023 as the group expected the RaCP plan to be endorsed by RSPO by year end of 2022 or first quarter 2023.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	Yes. There is a new acquisition namely Asia Ecogreen Sdn Bhd under Hwa Li Estate Div. 3 management. This area is to be certified this year.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Changes involved the restructure of Takon Production Unit due to selling of Takon Palm Oil Mill to non-RSPO member on 22/01/2021. Hence the cancellation of certification as production unit but	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	to certify the estates as supply base in existing certification unit. Changes not reflective yet in the existing submitted ACOP 2019 and to be submitted in ACOP 2020.	
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No isolated lapses.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No fundamental failure.	Complied
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 new development reported.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No new plantings since 1/1/2010.	Complied
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, the land conflict is on the process of authority application (Takon Production Unit).	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No labour disputed reported.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No labour disputed reported.	Complied
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Yes. Internal audit conducted on 13-14/9/2020, with 54 findings highlighted for site further improvement.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	No up to present.	Complied

3.3 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards

Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.</p>	<p>Not applicable.</p>	<p>NA</p>

3.4 Details of Nonconformities

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

During this Assessment there were two (2) Critical; one (1) Minor nonconformities and 2 Opportunity For Improvement raised. The Carotino/JC Chang Group - Carotino Palm Oil Mill (Carotino Production Unit) Certification Unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2014302-202101-M1	Clause & Category (Critical / Minor)	3.4.3 (Critical)
Date Issued	22/01/2021	Due Date	22/04/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	25/02/2021
Statement of Nonconformity:	The chemical spillage management was not satisfactorily implemented in accordance to the environmental management plan.		
Requirement Reference:	The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.		
Objective Evidence:	Based on the Environmental and Social Improvement Plan – West (Pahang), spillage of chemical was identified as one of the many environmental aspects. One of the solutions to be implemented was "Containment sump at storage area to be built at the rate of 10% higher than actual physical stock". However, at Carotino POM, it was found that a small store located behind the mill's lab and meeting room which purpose to keep hexane and IPA has no "containment sump" with capacity 10% higher than the chemical stock capacity been equipped. The perimeter metal wall of the store was also corroded which has caused many holes around.		
Corrections:	Carotino Mill Management constructed permanent containment bund with capacity of 2.4m x2.4m x 0.3m equivalent to 1.728m ³ = 1700liter.		
Root Cause Analysis:	Current storage area was temporary storage only. Usually mill will keep 1 container for each IPA & Hexane. Due to recent pandemic and flooding, mill store more to prevent running out of chemical and processing disrupted. Since temporary storage, during work place inspection containment sump over looked and miss out.		
Corrective Actions:	Mill has constructed containment bund to prevent spillage, existing ERP plan, SDS, spillage kit will be maintained and practiced. All spillage containment will be included into workplace inspection schedule on monthly basis.		
Assessment Conclusion:	The following evidences were verified on-site: 1) Based on site visit at the IPA & Hexane store, the concrete containment bund with capacity of 1,700 liters had been constructed		

	<p>2) Workplace inspection schedule has also been utilized where the checking of all the spillage containments has been included. The last checking was done in January 2021</p> <p>The evidence of correction and corrective actions implementation was found to be adequate to close the NCR. The continuous effective implementation shall be verified in the next assessment.</p>
--	---

Non-conformity			
NCR Ref #	2014302-202101-M2	Clause & Category (Critical / Minor)	7.8.2 (Critical)
Date Issued	22/01/2021	Due Date	22/04/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	25/02/2021
Statement of Nonconformity:	The implementation of management plan for maintaining riparian zones was not satisfactorily demonstrated.		
Requirement Reference:	Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.		
Objective Evidence:	Fertilizer (NK Mix) was found to be applied at some palms that stood very close (< 5 m) to Ketapi River at field no. 15A3, Maran Estate. This is not in-line with the requirement stated in the company's "Guidelines on Biodiversity Conversation Management Plan for Estates – WM" [doc. No.: C/006-01/2009, dated 20/2/2009], Clause 2.4 which reads, "All finalised buffer zones are to be subjected to 'do-nothing policy' i.e. no spraying and no manuring until they fully revert back to natural jungle conditions".		
Corrections:	Method of training to be conducted effectively where awareness on riparian zone not strictly based on peg, but based on width of the river as well.		
Root Cause Analysis:	Recently, there was a big flood, caused riverbanks being eroded. The palms that previously applied with fertilizer were so close with the riverbank this time after the erosion. Unfortunately, the workers not aware that even without peg but beside river also cannot be fertilized.		
Corrective Actions:	To conduct training on Riparian zone that emphasizes on width of river as well. At the same time peg will be put back according to guidelines.		
Assessment Conclusion:	<p>The following evidences were verified on-site:</p> <ol style="list-style-type: none"> 1) Training records of manuring workers on riparian zone dated 22/1/2021 2) Based on interview with the sampled trained manuring workers, it was found that they were able demonstrate a good understanding of the restriction of chemical application at any riparian zones. They were also able to explain the zone demarcation and the consequence should fertilizers were applied within the zones 3) Yellow painted PVC pipes pegs have also been reinstalled at the field as the riparian zone demarcation 		

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	The evidence of correction and corrective actions implementation was found to be adequate to close the NCR. The continuous effective implementation shall be verified in the next assessment.
--	---

Non-conformity			
NCR Ref #	2014302-202101-N1	Clause & Category (Critical / Minor)	3.3.3 (Minor)
Date Issued	22/01/2021	Due Date	Next surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	Open
Statement of Nonconformity:	The housing condition sighted during site visit was not reflective as per reported in the housing inspection record.		
Requirement Reference:	Records of monitoring and any actions taken are maintained and available.		
Objective Evidence:	<p>During the workers housing visit at Maran Estate, the following was observed:</p> <ul style="list-style-type: none"> - Sighted traces of oil spill on the ground in front of house # B01 B02 - The connecting drain at the back of the house # B01 B02 and the drain sump at the end of the blocks found not fully cleared its sedimentation which already started some undergrowth - The front door of house # C07 was missing its door knob - There's a small puddle of yellowish water located nearby black poly pipe and septic tank next to house # A07 A08 <p>Latest inspection visit dated 15/1/2021 shown all area in good condition and the back drain mentioned cleaned which was not reflective of actual condition during visit.</p>		
Corrections:	The report will be amended as per actual scenario		
Root Cause Analysis:	As Medical Assistant is not available currently, we had to appoint field staff to carry out the duty of linesite inspection instead. However, the staffs in charge are not thoroughly check the linesite and only check the cleanliness of housing compound. Appointment letter not really spelt out the duty clearly & only mentioned " to ensure cleanliness & hygienic condition"		
Corrective Actions:	Appointment letter had been amended to state clearly and specifically job function of linesite inspector. Timetable of line site shall be prepared for staff in charge as well as management team to inspect the line site.		
Assessment Conclusion:	The correction and corrective action plan were accepted. Verification of evidence of implementation shall be carried out in the next assessment visit.		

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

Opportunity for Improvements	
OFI #	Description
OFI 1	<u>2014302-202101-I1 (Indicator 6.2.5)</u> Identified aspect in the established as Environmental and Social Improvement Plan – West (Pahang); Doc. Ref. # N/009-02/2019; Date: 21/11/2019 related to fair pricing of food price could be further improved on pricing of non-tenanted grocery shop and or café operators to ensure workers' access to adequate, sufficient and affordable food continuously improving.
OFI 2	<u>2014302-202101-I2 (Indicator 7.8.2)</u> The progress of "rehabilitation of riparian zone" can be further improved by stating the status clearly in the company's "Environmental and Social Improvement Plan - West (Pahang)".

Positive Findings	
PF #	Description
PF 1	Good cooperation from the management team in the assessment activity.
PF 2	Retrieval of relevant documents was efficient.
PF 3	Employees have a good understanding the intention of sustainability standard.

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1871353-202001-M1	Clause & Category (Critical / Minor)	Indicator 7.10.1 Critical
Date Issued	10/01/2020	Due Date	8/04/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	06/03/2020
Statement of Nonconformity:	GHG emissions assessed for the unit of certification was not effectively monitored through the Palm GHG calculator		
Requirement Reference:	GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimize them are implemented, monitored through the Palm GHG calculator and publicly reported.		
Objective Evidence:	Incorrect input data reported in Palm GHG calculator. Details of data input checked: Maran Estate – NK Mix (palm GHG : 2032.4 mt vs actual: 2,060.35 mt), PMG Mix (palm GHG : 723.1 mt vs actual: 694.50 mt), 16.3 mt reported under BRP (palm GHG) but in actual record reported under Korn Kali.		
Corrections:	Management has been briefed by Internal Control Team Member during the audit. Correction and submission of the correct data is performed immediately.		
Root Cause Analysis:	Maran management was misunderstood on the data submission to the auditor. The fact that the data that has been submitted is a delivery of raw material data (ie: Fertilizer, fuel) instead of usage record data. Hence, the error is happening. At the same time, the data was submitted without counter check of the accuracy of the data.		
Corrective Actions:	Training and guidance will be conducted to the management as well as person in charge for updating the raw material issuance and to understand the data input requirement. Assistant manager will perform counter check on monthly basis to make sure data transferred from issuance record is tally. Apart from that, lead auditor for the production unit will request each unit to send the raw data template for the purpose of monitoring on quarterly basis.		
Assessment Conclusion:	Major NC onsite verification: Evidence reviewed: <ol style="list-style-type: none"> 1. PalmGHG training was provided by Sustainability Team (Mr Edwerd) to 3 participants (1 Store Clerk and 2 Assistant Manager) on 04/03/2020. Sighted the training material and evaluation form. 2. Verification of the actual fertilizer application on the stock card summarized in Maran PalmGHG Data by Store Clerk for NK Mix: 2060.35 t/yr, PMG Mix: 718.55 t/yr, BRP: 17.8 t/yr and Korn kali 16.6 t/yr. 3. The establishment of MRN_Farm_GHG working template for the GHG input data monitoring by monthly basis (by assistant manager) and quarterly (lead auditor for Carotino production unit). 4. Interview session with the Store Clerk (Nor Jannatul Afifi) and Assistant Manager (Mr Tamil Selvan A/L Murthy & Mr Lee Wei Tak) on 06/03/2020 on the training provided. All the correction, corrective action and its evidence of implementation were found to be adequate. The Major NC closed on 06/03/2020.		
ASA2_1 Verification	Based on verification of GHG data input against various records such as store issuance records and Lintramax system, the data was found to correct and		

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	verifiable. The was no recurrence of error in data entry. Thus, the Critical NCR remains closed.
--	--

Non-conformity			
NCR Ref #	1871353-202001-M2	Clause & Category (Critical / Minor)	Indicator D.5.1 Critical
Date Issued	10/01/2020	Due Date	8/04/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	06/03/2020
Statement of Nonconformity:	Record and balance of PK was not monitored on real-time basis.		
Requirement Reference:	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.		
Objective Evidence:	Based on quarterly sustainable product from (April - June 2019), opening stock: 24.31 mt, production: 595.26 mt, despatch: 680.90 mt, balance: - 61.33 mt. Negative stock recorded for the closing month of May 2019 after delivery was made.		
Corrections:	Carotino Palm Oil Mill had stop immediately all the delivery of PK. Delivery of PK will be only continued once the real time basic data shown the positive stock of sustainable PK.		
Root Cause Analysis:	Management was wrongly interpreting the requirement to monitor the PK and CPO movement upon expiry date of certificate. The requirement only made clear to the management during the audit.		
Corrective Actions:	<ol style="list-style-type: none"> Ms Norzilawati as a person in charge will monitor on daily basic the movement of PK and CPO to prevent negative stock record in future. As a person in charge, Ms Norzilawati will also ensuring there is a positive and sufficient sustainable RSPO CPO and PK stock through carry out monitoring on the IP table in real-time basis prior to make any dispatch of RSPO CPO or PK. Refreshing training will be conducted for Ms. Norzilawati to ensure the issue is not repeated in future. This to address the wrongly interpreting the requirement. 		
Assessment Conclusion:	<p>RC2 verification: Evidence reviewed:</p> <ol style="list-style-type: none"> The correspondence on 16/01/2020; request from Mill Manager (Mr. Kenny) to Marketing Manager (Mr. Ng) to stop dispatch RSPO PK due to negative stock. The current stock is to be replaced to sell as non-sustainable PK until the stock for sustainable PK is positive. The establishment of sustainability products PK, with additional of PK stock balance for non-sustainable and sustainable PK for monitoring the positivity of the PK balance. This will be checked in everyday basis. Sighted the PK stock balance for January 2020 is 75.18 MT and February 2020 is 610.14 MT. Traceability can be demonstrated through the daily production of PK and daily production listing. Training record titled 'Pemantauan CPO/PK & Real Time' on 21/01/2020 to 1 Admin Officer and 2 weighbridge clerk by Mr Chandran, Senior Assistant Manager. Interview session with 1 Admin Officer (Norzilawati) and 2 weighbridges clerk (Nur Atiqah & G.A Aswini) on 06/03/2020 on the training provided. <p>All the correction, corrective action and its evidence of implementation were found to be adequate. The Major NC closed on 06/03/2020.</p>		

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

ASA2_1 Verification	<p>Referring to the RSPO PalmTrace license expiry date,</p> <ul style="list-style-type: none"> - on 26/4/2020: balance of CSPK = 238.83 mt - 27/4/2020 36.91 mt dispatched as conventional and 201.92 mt kept as conventional PK - on 26/4/2020: balance of CSPO = 1,511.21 mt - on 27/4/2020 mt all was kept as conventional CPO <p>There was no recurrence of non-conformity. Thus, the Critical NCR remains closed.</p>
----------------------------	--

Non-conformity			
NCR Ref #	1871353-202001-N1	Clause & Category (Critical / Minor)	Indicator 2.1.3 Minor
Date Issued	10/01/2020	Due Date	22/01/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	22/01/2021
Statement of Nonconformity:	Legal or authorised boundaries are not consistently demarcated and visibly maintained.		
Requirement Reference:	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.		
Objective Evidence:	Observed during site visit, there is no marking/demarcation made and visibly maintained along legal boundary with Suburban Properties Estate. At Hwa Li 2, it was found that no clear demarcation observed and visibly maintained along legal boundary with Felda Palong Timur Lima.		
Corrections:	<p>Hwa Li Estate Div. 1: Every field staff being instructed to carry out the census on current availability of planted boundary stone and PVC pipe for marking with red paint for demarcation is used to replace the missing pegging along the estate boundary.</p> <p>Hwa Li Estate Div. 2: Management has identified the area and replacement of missing pegging will be performed. The Assistants and staff will perform regular checking and arrange for maintenance of legal boundary to ensure the legal demarcations are in place at all times.</p>		
Root Cause Analysis:	<p>Hwa Li Estate Div. 1: Management is in progress to install the pegging as the previous pegging for that stretch of boundary is no longer exist due rotten and Person In Charge for that particular area does not carry out inspection and also did not replace the missing pegging.</p> <p>Hwa Li Estate Div. 2: The outsiders who illegally cultivated oil palms beside our legal boundary have removed our boundary demarcation. Apart from that, person in charge for that particular scratch of boundary also did not perform inspection and replace the missing pegging.</p>		
Corrective Actions:	<p>Hwa Li Estate Div: The management decided to include in the plan for monitoring purpose on the boundary stone and to ensure the marking is visibly maintained along the legal boundaries. Staff in charge for each field will regularly check the marking boundary along their own management area to ensure the marking is maintained as what it is.</p>		

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	Hwa Li Estate Div. 2: The Manager and Assistants will immediately arrange for consultation with the stakeholder to alert them on the legal boundary marking. Management will redo clear legal boundary demarcation with permanent markers.
Assessment Conclusion:	RC2 verification: Corrective actions plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence CAP will be verified during next assessment.
ASA2_1 Verification	The assessment was conducted in Maran Estate and Asia Oil Palm Estate. Guidelines on Legal or Authorized Boundaries were available in the estate to guide the management of boundaries. Legal boundaries for both estates were visited and noticed to be clearly demarcated with security trenches, poles and rings painted along trees at the boundaries. The boundary stones were maintained and visible along the boundary with the Forest Reserves. Detailed verification of both estate boundaries is stated in indicator 2.1.3. Since the boundaries were consistently demarcated and visibly maintained, the minor NC is therefore closed.

Non-conformity			
NCR Ref #	1871353-202001-N2	Clause & Category (Critical / Minor)	Indicator 3.3.2 Minor
Date Issued	10/01/2020	Due Date	22/01/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	22/01/2021
Statement of Nonconformity:	Found that the 2 Stand by Persons assigned for the job were not Authorised Entrant and Standby Person (AESP) Competent Persons.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	The 2 Person (Ramesh and Lalitha) were not on the list of AESP Competent Person provided.		
Corrections:	All activity on Confined Space related stopped immediately. The person in-charge of OSH and OSH secretary has been briefed and understand the Guidelines on Confined Space requirement. PIC will check all requirements complied before allowing any activity related to Confined Space.		
Root Cause Analysis:	Mill management was wrongly interpreting the requirement of confined space COP. Just for info Mill assigned 3 personnel Mr Maniseelan(AESP), Mr Ramesh(1st Aider) & Ms Lalitha (1st Aider) for the particular job under rescue team "Pasukan Penyelamat", Carotino Management assumed Ramesh and Lalitha already a first aider not required AESP Competent Person.		
Corrective Actions:	The Manager will perform training to person in-charge and secretary of Occupational Health on Confined Space Guideline. Management/PIC will make sure all personnel involved with Confined Space activity must be AESP Competent Person including first aider.		
Assessment Conclusion:	RC2 verification: Corrective actions plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence CAP will be verified during next assessment.		
ASA2_1 Verification	During the verification, it was noted that the mill had identified 12 personals that are involved with confined space activity. The mill had ensured that all 12 workers are AESP competent with valid Training Certificate Card which was produced by		

**RSPO P&C Public Summary Report
Revision 11 (Sept 2020)**

	NIOSH. Interview with the workers indicated that they were trained on the understand the Guidelines on Confined Space requirements. Hence, the corrective actions are deemed to be satisfactory and the minor non conformity is therefore closed.
--	---

Opportunity for Improvement	
OFI#	Description
	Nil

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1729621-201901-N1	Major	4.1.2	17/01/2019	Closed out on 10/01/2020
RSPO P&C MYNI 2019				
1871353-202001-M1	Critical	7.10.1	10/01/2020	Closed out on 06/03/2020
1871353-202001-M2	Critical	D.5.1	10/01/2020	Closed out on 06/03/2020
1871353-202001-N1	Minor	2.1.3	10/01/2020	Closed out on 22/01/2021
1871353-202001-N2	Minor	3.3.2	10/01/2020	Closed out on 22/01/2021
2014302-202101-M1	Critical	3.4.3	22/01/2021	Closed out on 25/02/2021
2014302-202101-M2	Critical	7.8.2	22/01/2021	Closed out on 25/02/2021
2014302-202101-N1	Minor	6.2.4	22/01/2021	Open

3.5 Stakeholders and previous land owner / user 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 Carotino Palm Oil Mill (Carotino Production Unit) 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	
Internal Stakeholders - Foreign and local workers - Gender committee representatives	Union/Contractors/Communities - FGV Lepar Hilir Utara 05 - Orang Asli village - Contractors - Suppliers
Government Departments Nil	NGO Nil

Stakeholders comment	
1	Feedbacks: Mill & Estates vendor: No issue in contractual works and supplied spare parts pricing and payment. Has long business relationship with company for more than 10 years.
	Management Responses: Positive comments noted.
	Audit Team Findings: No further issue.
2	Feedbacks: Neighbouring estate (FGV Lepar Hilir Utara 05) & Durian farm (ADC Durian Sdn. Bhd.): Managers of both FGV Estate and durian farm been invited to latest stakeholder meeting and attended accordingly. Management of Carotino CU communicated and explained well on RSPO sustainability requirements. Have good relationship with company management and no issues related to land and planting boundaries between both companies.
	Management Responses:

	<p>Positive comments noted.</p> <p>Audit Team Findings: No further issue.</p>
3	<p>Feedbacks: Local & foreign workers’ JCC representatives: Most of workers felt stressful for not being able to go out of estate and housing compound due to voluntary lockdown enforced by management since January 2021. However, it is agreed among them that it is safer and whatsoever, estates management been very helpful to assist on workers needs including daily sundries especially when nearby external grocery shop and restaurant price a bit expensive than in Sri Jaya and Kuantan town.</p> <p>Management Responses: It was understood the stress condition among workers due to unable to go out of estate. Management provide full support mainly in providing workers needs during this pandemic period for their own benefits as well as companies. Management has no control over external owner of grocery shop and restaurant since both owners also have issues in getting their materials and stocks in their operating outlets. Workers however are provided with alternative to go to town except during this voluntary lockdown period, they can only order through staff in-charges.</p> <p>Audit Team Findings: An OFI has been raised in indicator 6.2.5 related to the issues of food prices.</p>
4	<p>Feedbacks: Grocery store/canteen operator: Had issues during Movement Control Order (MCO) and Conditional Movement Control Order (CMCO) period to buy shop’s stock from wholesaler due to stringent enforcement by estate management that requires mandatory swab test every time out and come back in estate. Had discussion and allowed to conduct the swab test only if necessary, i.e. if have symptoms.</p> <p>Management Responses: Management must strictly follow company’s directive in order to prevent occurrence and spread of COVID-19 case. All companies within Carotino/JC Chang Group had implemented voluntary lockdown since October 2020 in Sabah and January 2021 in Peninsular for at least 3 to 6 months to ensure sustainable operations.</p> <p>Audit Team Findings: No further issue.</p>
5	<p>Feedbacks: Kampung (Mill) & Orang Asli representatives: No issue by mill and estate activities. Have good relationship with management of company and staff who are mostly among local villagers. Company very helpful when local villagers have problem such as during the recent flood season by assisting to repair roads and aid with flood victim.</p> <p>Management Responses: Positive comments noted.</p> <p>Audit Team Findings: No further issue.</p>

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

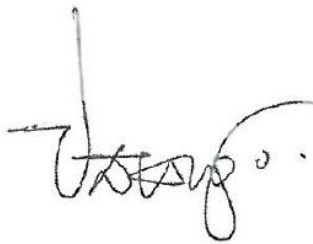
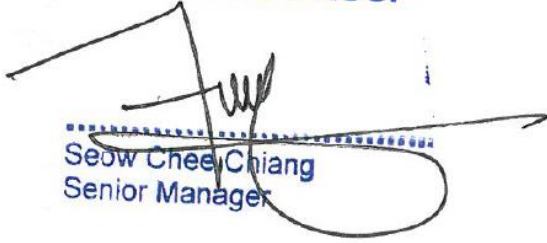
List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
NA					
Note: There is no customary rights land in the Carotino Palm Oil Mill (Carotino Production Unit) Certification Unit. Moreover, the most of the planting cycles had passed their second cycle of planting.					

Previous land owner / user comment – Not applicable	
	Feedbacks:
	Management Responses:
	Audit Team Findings:

3.6 Impartiality and conflict of interest

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

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 Carotino Palm Oil Mill (Carotino Production Unit) has complied with the RSPO Principles and Criteria Malaysia National Interpretation 2019 for Sustainable Palm Oil 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 Carotino Palm Oil Mill (Carotino Production Unit) is continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Valence Shem	Name:
Company Name: BSI Services Malaysia Sdn Bhd	Company Name:
Title: Lead Auditor	Title:
Signature: 	<p>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></p> <p>CAROTINO / J.C. CHANG GROUP</p> <p> Seow Chee Chiang Senior Manager</p>
Date: 16/05/2021	Date: 17/05/2021

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides 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	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>The list of information that can be requested by stakeholders is mentioned in Guideline on Mechanism for Information Requests by Stakeholders [Doc. Ref. No. E/006-08/2019], Clause 3.0.</p> <p>The following documents were publicly available at all the operating units upon request:</p> <ul style="list-style-type: none"> • Land titles/user rights (Criterion 4.4) • Occupational health and safety plans (Criterion 3.6) • Plans and impact assessments relating to environmental and social impacts (Criterion 3.4) • HCV documentation (Criterion 7.12) • Pollution prevention and reduction plans (Criterion 7.10) • Details of complaints and grievances (Criterion 4.2) • Continuous improvement plans (Criterion 3.2) • Public summary of certification assessment report • Human Rights Policy (Criterion 4.1) • Summary report of contributions to community development (criterion 4.3) • Procedure for negotiation on compensation (Criterion 4.6) <p>Since the last assessment, there has been no request for the above information from any stakeholders.</p>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>JC Chang Group has developed a Guideline on Mechanism for Information Requests by Stakeholders. The guideline has been reviewed on 12/08/2019 and updated documentation with Doc. Ref. No. E/006-08/2019 was available for review. Information provided</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		in both English and Bahasa Malaysia and accessible to all stakeholders of JC Chang Certification Unit. Stakeholders may come to estate/mill office or visiting the company's website i.e. www.carotino.com .	
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	Requests handled based on the Guidelines on Mechanism for Information Requests by Stakeholders; Doc. Ref. # E/006-08/2019; Date: 12/8/2019. Records of requests for information and responses maintained well in Maran Estate. Sample latest request received from internal stakeholders among workers was to extend the electricity supply hour during Chinese New year. Carotino POM latest Request was approved by estate management accordingly. Carotino POM latest request made by internal stakeholder was on 10/1/2021 to repair leaked pipe in labour line. Issues also resolved on the same day. Requests records maintained in Asia Oil Palm Estate 1 well as per sample latest on the request made by internal stakeholder to repair road (request form # 291) on 20/9/2020 which was resolved on 23/9/2020.	Complied
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -	Appointed Person Responsible for Maran Estates Sustainability was Mr. Tamil Selvan A/L Murthy as per letter dated 10/10/2019. PIC for Carotino POM was Ms. Norzilawati Abdul Ghafar as per letter of appointment dated 15/7/2014.	Complied
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	Current list of stakeholders details including contact name, address and email sighted available as per Maran Estate Stakeholder List updated as at 5/1/2021. Stakeholders among vendors, neighbours, local community representatives and authorities were registered in the stakeholder list. Latest stakeholder meeting was conducted on 6/1/2021 held in combination by Carotino POM, Maran Estate,	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		Pahang Oil Palm Estate 1 and Asia Oil Palm Estate 1. Previous meeting was conducted on 28/11/2019.	
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	Policy for ethical conduct also distributed and acknowledged by vendors for sample stakeholders as following: - Bakti Juwita Sdn. Bhd.; Maran Estate neighbouring mining company - Monument Mengapur Mining; Maran Estate neighbouring mining company - Kema Development Sdn. Bhd.; Maran Estate neighbouring estate - Pritam Singh Agency Sdn. Bhd.; Carotino POM CPO transporter - Hup Shing Berjaya Enterprise; Carotino POM PK transporter Latest policy briefing by Carotino POM to all its employees was conducted on 1/12/2020.	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	Monitoring of compliance for the implementation of the policy was done through several inspection visits by internal auditors, latest conducted internal audit on 17-19 June 2020. Plantation's Senior Manager visit also conducted latest on 5-7 October 2020. Asia Oil Palm Estate 1 internal audit was conducted on 24-27 August 202 as per records of internal audit report ref. # JCC/HAU/AOP1/01/20; Dated 28/8/2020.	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	The Carotino Certification Unit continue to comply with all applicable legal requirements. Sampled licenses and permits as below:	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p><u>Carotino POM</u></p> <ol style="list-style-type: none"> 1. MPOB License; License Number: 500356604000; Processing Permitted: 144,000 Mt FFB/Year; License Validity Period: 01/11/2020 till 31/10/2021. 2. DOE License – Compliance Schedule; License Number: 005110; Effluent Disposal Method: Land Application; Registration Number: JP/KKS/2020/2021/005110; License Validity Period: 01/07/2020 till 30/06/2021. 3. Energy Commission – Private Installation License; Serial Number: 42483; License Number: 2020/00348; License Validity Period: 28/02/2020 till 27/02/2021 4. Permit to Purchase, Store and Use of Sodium Hydroxide; Serial Number: 003913; Registration Number: CC0016/2021; License Validity Period: 01/01/2021 – 31/12/2021 5. Diesel License – Non-Subsidised; Reference Number: KPDNHEP TLH 600-5/2/16/90; P Series Number: C000181; Storage Capacity: 16,000 Litre; License Validity Period: 18/05/2020 till 17/05/2021. <p><u>Maran Estate</u></p> <ol style="list-style-type: none"> 1. Air Compressor License; Registration Number: PMT-PH/20 30493; License validity Period: Valid till 15/04/2021. 2. MPOB License; License Number: 502407502000; Estate Area: 2140.82 Ha; License Validity Period: 01/05/2020 till 30/04/2021. 3. Energy Commission License (Private Installation License); Serial Number: 44161; License Number: 2020/01385; License Validity Period: 01/07/2020 till 30/06/2021. 	
--	--	--	--

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>4. Petrol License (Ron95); Reference Number: KPDNHEP/TLH/600-5/2/330/16 (PK); Storage Capacity: 100 Litres/Day; License Validity Period: 07/01/2021 till 06/07/2022</p> <p>5. Diesel License; Reference Number: KPDNHEP TLH 600-5/2/22/19; Storage Capacity: 12,000 Litres; License Validity Period: 03/07/2020 till 02/07/2021</p> <p>Asia Palm Oil Estate</p> <p>1. MPOB License; License Number: 501433902000; Estate Area: 2167.42 Ha; License Validity Period: 01/04/2020 till 31/03/2021.</p> <p>2. Diesel License; License P Series Number: C000136; License Reference Number: KPDNHEP TLH 600-5/2/32/83; License Period 13/01/2020 till 12/01/2021; Application for license renewal sent on 07/11/2020 awaiting approval (Reference Number: BL220200043142)</p> <p>3. Petrol License; License P Series Number: C000230; License Reference Number: KPDNHEP/TLH/600-5/2/328/16 (PK); Storage Capacity: 200 Litres/Day; License Validity Period: 05/08/2020 – 04/02/2021.</p> <p>4. JTK Permit; Permit for Deduction from Workers Salary; Serial Number: PP3/20/0004; License Effective: 29/04/2000.</p> <p>5. Energy Commission; Private Installation License; Serial Number: 46555; License Number: 2020/02629; License Valid for 1 year from 18/03/2021.</p> <p>6. Sijil Kebenaran Penggunaan Air from Pahang Water Resource Sdn Bhd, #42/2020, valid until 31/12/2020 – the mill has applied for renewal and waiting for the new license.</p>	
--	--	---	--

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

<p>2.1.2</p>	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations. - Minor compliance -</p>	<p>Identification and documentation of applicable legal requirements is guided by SOP on Mechanism to Trace Changes in Legal Requirements (Doc Ref Number: E/005-07/2017); Doc Date: 06/01/2017.</p> <p>The applicable legal requirements for the mill and estate were registered in Register of Legal and Other Requirements which was last updated on:</p> <ol style="list-style-type: none"> 1. Maran Estate: 04/01/2021 2. Carotino POM: 04/01/2021 3. Asia Palm Oil Estate: 05/01/2021 <p>The register has info about Legal and Other Requirements, (News Flash/ Subject), Source and Date.</p> <p>Tracking system to identify changes in the relevant regulations were available through the head office, website information and is communicated from the Group Head Office. Sighted the latest review to include new updates for Extension of RMCO until 31/03/2020, Reduction of Employee Provident Fund (EPF) Statutory Contribution Rate of Employees with Effect from 1st January 2021, Wildlife Conservation Act 2010, Wildlife Conservation (Hunting Prohibited Areas (Amendment) and Employees Minimum Standards of Housing, Accommodations and Amenities.</p> <p>On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operation. Tracking system on any changes in the law had been well implemented.</p>	<p>Complied</p>
<p>2.1.3</p>	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p>	<p>Guidelines on Legal or Authorised Boundaries are guided by the documented procedure Guidelines On Field Blocking and Boundary</p>	<p>Complied</p>

	<p>- Minor compliance -</p>	<p>Maintenance; Doc Ref Number: B/003-04/2017; Doc Date: 07/07/2017.</p> <p><u>Carotino POM</u></p> <p>The mill is located on the Pahang Estate land title (Ownership Number: 27255; Lot Number: Lot 23600; Title Area: 264.6 Ha). The land title and quit rent payments for Pahang Estate were available for verification. The mill compound's boundary is demarcated with fences to sperate the area occupied by the mill with the estate.</p> <p><u>Maran Estate</u></p> <p>Legal boundaries were well maintained and clearly demarcated in the estate. Visit to Field 13A5 boundary with Berkhelah Forest Reserve showed the boundary stone was well maintained. The management constructed boundary trenches and placed fences along the boundary. There were no signs of planting after the demarcated boundary.</p> <p><u>Asia Oil Palm Estate</u></p> <p>Boundary between field PM00A and Berkhelah Forest Reserve was demarcated with security trenches. The boundary stone (Lat. 003° 47'43" N, Lon 102° 46'38" E) was well maintained. Boundary between FieldPM03A and Lembaga Kemajuan Perladangan Pahang were demarcated by painted rings (Red) on the palms across the boundary.</p>	
--	-----------------------------	--	--

Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>A list of contractors is available at all the operating units. Among the contractors registered in the list were:</p> <ul style="list-style-type: none"> • CPO & PK transporters • Sundry shops • Recruitment agencies <p>Among the information available in the list was supplier names, contact number, email address, contact person and business address.</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>Contract agreements between the following contractors were sampled:</p> <p>Maran Estate PT. Genta Gumi Selapawis PT. Tekad Jaya Abadi Winbond Management Consultancy Sdn Bhd</p> <p>Carotino Mill Hup Shing Berjaya Enterprise Pritam Singh Agency Sdn Bhd Eng Lee Sing Sdn Bhd</p> <p>Asia Oil Palm Estate 1 Lim Huat PT Tekad Jaya Abadi PT Andalas Mitra Prestasi PT Teja Mukti Utama</p>	Complied

		<p>Based on the samples, the specific clauses on meeting applicable requirements were stated in "Sustainability Compliances Contract with Operating Unit Under J.C. Chang Group".</p> <p>Mechanism of due diligence is implemented and guided by "Questionnaire on Legal Compliance and Ethical Conduct" [doc. No.: E/024-01/2019]. Among the aspects considered in the due diligence process are;</p> <ul style="list-style-type: none"> • Availability of license to operate • Company compliances towards ethical conduct/corruption prevention • Company compliances towards applicable legal requirements • FFB suppliers' detail • FFB suppliers document requirement • FFB suppliers with leasehold ownership • History of land tenure detail 	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>Statement on disallowing child, forced and trafficked labour were mentioned in "Sustainability Compliances Contract with Operating Unit Under J.C. Chang Group".</p>	Complied
<p>Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims 	<p>NA as Carotino POM does not have FFB suppliers from outside the unit of certification.</p>	Complied

	<ul style="list-style-type: none"> Valid MPOB license <p>- Critical (Major) compliance -</p>														
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1.</p> <p>- Minor compliance -</p>	NA as Carotino POM does not have FFB suppliers from outside the unit of certification.	Complied												
Principle 3: Optimise productivity, efficiency, positive impacts and resilience															
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.															
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>JC Chang Group continued its commitment to long term sustainability and improvements through a capital expenditure program. Annual budget and management plan were documented with three years projection (FY 2021/22, 2022/23 and 2023/24), where budget for all the operational activities such as harvesting, maintenance and milling) were allocated. It includes FFB Production, FFB Received Trends (Mill) CPO, PK, OER, and KER, Production Cost, CAPEX and OPEX were verified.</p> <p>Carotino Palm Oil Mill and its supply bases have made progress towards achieving their performance and production targets for the current financial year. There is no scheme smallholder found within the supply base.</p>	Complied												
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>Estates visited have developed an annual replanting programme projected till the year 2044. The projection for the next 5 years has been sampled and shown below:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>Maran Estate</td> <td>nil</td> <td>nil</td> <td>nil</td> <td>nil</td> <td>nil</td> </tr> </tbody> </table>	Estate	2021	2022	2023	2024	2025	Maran Estate	nil	nil	nil	nil	nil	Complied
Estate	2021	2022	2023	2024	2025										
Maran Estate	nil	nil	nil	nil	nil										

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<table border="1"> <tr> <td>Asia Oil Palm Estate</td> <td>nil</td> <td>174.14</td> <td>174.90</td> <td>230.23</td> <td>131.75</td> </tr> </table> <p>* Maran Estate's next replanting is projected for the year 2031.</p>	Asia Oil Palm Estate	nil	174.14	174.90	230.23	131.75	
Asia Oil Palm Estate	nil	174.14	174.90	230.23	131.75				
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>The Management Review is guided by the Guideline for Internal Auditing and Management Review of the Sustainability and Supply Chain System; Doc Ref Number: T/001-03/2018; Doc Date: 03/06/2018.</p> <p>The management review was conducted at HQ level for all operating units on 01/07/2020.</p>	Complied						
<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>									
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>The establishment of continuous improvement plan is guided by "Continuous Improvement Plans for Estates" [doc. No.: N/002-03/2013, dated 27/6/2013].</p> <p>Among the action plan for continuous improvement established by all the operating units were: - <i>refer audit notes</i></p> <ol style="list-style-type: none"> 1) Minimise the use of certain pesticides 2) Minimising the environmental impacts 3) Maximising recycling activity and minimising wastes or by-products generation 4) Pollution prevention 5) Minimization of social impacts 6) A mechanism to capture the performance of expenditure in social and environmental aspects 	Complied						

		<p>Sighted the budget for Improvement Plan for FY 2020/2021, which has the information about improvement programmes, financial allocation and date of completion.</p> <p>Based on samples, the implementation of the plans was found to be in line with the timeframe allocated.</p>	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE: The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed. Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>The company has maintained the submission of its GHG calculation using RSPO Palm GHG calculator and ACOP to RSPO secretariat. The documents were made available during this assessment.</p>	Complied
<p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>JC Chang Group has established working documents that include SOPs and Guidelines for use by its estates and mills. They were listed in the Guidelines Register and categorized as follows:</p> <ol style="list-style-type: none"> 1. Oil Palm Nursey and Replanting 2. Upkeep and Cultivation 3. Soil, Water and Biodiversity Conservation & Management 4. FFB Harvesting & Despatch 5. Legal, Employment, Welfare, Communication and Consultation 6. Waste & Pollution Management 7. Vehicles and Workshop Management 8. Store Management 	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<ul style="list-style-type: none"> 9. Building Construction Management 10. Insurance 11. Buffalo Management 12. Pest & Disease Management 13. OSH - Estate 14. Improvement Plan 15. Impact Register and Assessment 16. OSH – Mill 17. SOP Mill and Compost Plant 18. Supply Chain 19. Memo 20. General 21. OSH – General <p>Under each Document Category there are several titles. Each document title has its Document Reference no., Date issued and Version No. and are cross referenced to RSPO MYNI:2019 P&C Indicator Number for ease of locating the required document.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -</p>	<p>To ensure procedures are always followed the Mechanism to Check Consistent Implementation of SOP Doc Ref No. U/025-01/2015 Effective date 08/09/2015 is used.</p> <p>At the assessed Operating Units of Carotino Pahang POM, Maran Estate and Asia Palm Oil Estate, the checks were carried out by the respective Supervisor Staffs, Assistant Manager and Manager. For example, the Field/Mill Supervisor conduct on-site visit to check, Assistant Manager to confirm and Estate/Mill Manager to approve. The general manager conducts annual visits to assess and consult</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>on deviations to the SOPs and provide advisory on improvements to be done at the operating units.</p>	
<p>3.3.3</p>	<p>Records of monitoring and any actions taken are maintained and available. - Minor Compliance -</p>	<p>Operating units visited maintain all records of monitoring and available for review. The Mill Manager and Estate Managers are accountable to monitor the estates compliance towards the SOP, Budget and Productivity.</p> <p>Various checklists were available and being used by the estates and mill for operations, health and safety monitoring, workers welfare and environmental issues. Among others, the sighted reports available at the estate and mill are as below:</p> <ol style="list-style-type: none"> 1. Line site Inspections (Weekly) 2. Work Site Inspections (Quarterly) 3. Internal Audit (Yearly) 4. PPE Checklist <p>Adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities in compliance with the Workers Minimum Housing and Amenities Standard Act 1990 provided by the company as evidence from the site visit. Regular monitoring also conducted as per sample records of latest housing inspection in Maran Estate dated on 13/1/2021. Previous inspection was done on 5/1/2021.</p> <p>During the workers housing visit at Maran Estate, the following was observed:</p> <ul style="list-style-type: none"> - Sighted traces of oil spill on the ground in front of house # B01 B02 - The connecting drain at the back of the house # B01 B02 and the drain sump at the end of the blocks found not fully cleared its sedimentation which already started some undergrowth 	<p>Non-compliance</p>

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>- The front door of house # C07 was missing its doorknob</p> <p>- There's a small puddle of yellowish water located nearby black poly pipe and septic tank next to house # A07 A08</p> <p>Latest inspection visit dated 15/1/2021 shown all area in good condition and the back drain mentioned cleaned which was not reflective of actual condition during visit.</p> <p>This indicates that the housing condition sighted during site visit was not reflective as per reported in the housing inspection monitoring records.</p> <p>Hence, a Minor Non-compliance has been raised on the matter.</p>	
<p>Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
<p>3.4.1</p>	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting in any of the sampled estates. Nonetheless, the assessment of environmental impact of its existing activities is documented in the following documents:</p> <p>Environmental Impact Assessment was done through SEIA conducted by Wild Asia where report dated 14/1/2009 was available for verification. Among the identified significant aspects were water quality and availability, contamination of soil or water, air pollution in the form of dust emissions of greenhouse gas emissions, loss of biodiversity.</p> <p>Carotino Production unit has carried out the annual review of environmental impacts in term of Environmental and Social Improvement Plan. The review was last carried out on 15/9/17. The plan incorporated the environmental aspect and impacts with mitigation plans for mill and estates activities.</p>	<p>Complied</p>
<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p>	<p>The continuous implementation of the improvement activities was checked during the field visit and documents review. The environmental management plan has been established to monitor</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	<p>- Minor Compliance -</p>	<p>the identified significant activities that give impacts to the environment. A specific staff and executive have been appointed to do the monitoring to ensure the plan is effectively implemented.</p>	
<p>3.4.3</p>	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -</p>	<p>The plan established as Environmental and Social Improvement Plan – West (Pahang); Doc. Ref. # N/009-02/2019; Date: 21/11/2019. Issues identified on following:</p> <ul style="list-style-type: none"> - Local food and water security; Impact identified only Deterioration of local food and water source with action plan that all stakeholders be consulted and informed prior the planning on the kind, type of project and impact of the project as well as the rules of the activity through participation at all stages of the project cycle. Program include conduct stakeholder visit to the affected parties & all records of consultation, resolution and compensation should be properly documented and filed - Food price identified in fair pricing: Lack of monitoring system of shop prices for impact good sold at high price compare to outside market – action plan shop price monitoring on monthly basis; method monitor shop price and compare with nearest shop in an appropriate interval; if prices higher than rate stated in contract agreement, perform consultation with shop owner; if still high next month issue letter; if not improve, renewal to be considered - Latest plan management review conducted on 21/11/2019 – plan implemented for 2 years until 20/11/2021 before being review again <p>Based on the Environmental and Social Improvement Plan – West (Pahang), spillage of chemical was identified as one of the many environmental aspects. One of the solutions to be implemented</p>	<p>Non-compliance</p>

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		was "Containment sump at storage area to be built at the rate of 10% higher than actual physical stock". However, at Carotino POM, it was found that a small store located behind the mill's lab and meeting room which purpose to keep hexane and IPA has no "containment sump" with capacity 10% higher than the chemical stock capacity been equipped. The perimeter metal wall of the store was also corroded which has caused many holes around. Thus, a critical non-conformity report was assigned due to this lapse.	
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable. - Minor Compliance -	The procedure established as Guidelines on Procedure or System of Recruitment, Selection, Hiring, Promotion, Retirement and Termination; Doc. Ref. # E020-01/2019; Doc. Date: 12/8/2019. The procedure was briefed to all existing employees and new employees on periodical basis and made available to them upon requests.	Complied
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	Employment procedures are well implemented with records well maintained as per information reported in indicator 6.1.1 to 6.6.2 below.	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -	Carotino POM 1. HIRARC was established as the method to assess risks related to all activities in the mill. The Guideline on Hazard Assessment, Prevention and Control (Risk Management and Mitigation Plan (Doc. Ref. No: UO29-01/2019; Doc Date: 15/08/2019) was used as a guideline to identify and control hazards in the mill. The HIRARC is reviewed every 2 years with the last review done on 01/07/2020. Among the HIRARC	Complied

**RSPO P&C Public Summary Report
Revision 11 (Sept 2020)**

		<p>sighted was FFB Reception, Threshing Station, Pressing Station and Clarification Station.</p> <ol style="list-style-type: none"> 2. Chemical Health Risk Assessment was conducted in the mill to assess the risks of all hazardous chemicals that are used in the mill in accordance with USECEHH Regulations 2000. The CHRA assessment was done by Dosh Registered Assessor (HQ/09/ASS/00/102) from Procoma Environmental (M) Sdn Bhd. Chemical Register were maintained and updated in accordance with the CHRA recommendation. The latest updated was dated 12/10/2020. Additional Assessment was done to include 3 additional chemicals used in the mill lab. The assessment was conducted on 21/08/2018 by Alam Hijau Integrasi (M) Sdn Bhd (DOSH Registration Number: PHY 917) with the CHRA Report (Report Number: ALM/CHRA/CSB/0818/4287) available for verification. 3. Medical Surveillance was conducted as recommended in the CHRA for workers exposed to hazardous chemicals as stated in the USECEHH Regulations 2000. A total of 5 workers identified were tested by Poliklinik Ar Razi on 19/08/2020. The Medical Surveillance Report (Report Number: 200-ArRAZIKTNMT (MKT.1/30) stated that the 5 workers were tested on the exposure to n-Hexane and Chromium where all 5 workers showed normal results and were fit to work. 4. Noise Risk Assessment was conducted Alam Hijau Integrasi (M) Sdn Bhd as required by the Occupational Safety and Health (Noise Exposure) 2019. The Baseline Noise Risk Assessment (Area) was conducted on 15 – 16/01/2020 and the Personal Noise Monitoring Assessment was conducted on 07/09/2020. 	
--	--	--	--

**RSPO P&C Public Summary Report
Revision 11 (Sept 2020)**

		<p>The reports were available for verification. (Report Reference Number: NRA 200105).</p> <p>5. Annual & Baseline Audiometric Testing was conducted for workers exposed to excessive noise on 11/11/2020 by Procima Environmental (M) Sdn Bhd (DOSH Registration: JKPP H/E 127/12/4-65/17) as per Occupational Safety & Health Act (Noise Exposure) Regulation 2019 requirements. A total of 37 workers identified to be exposed to excessive noise were selected to undergo the audiometric test. The results indicated that there are nine (9) abnormal audiometric results. Out of the 9 abnormal results, 3 had Occupational Standard Threshold Shift. The mill has reported the incident to DOSH via JKPP 7 form with the report available for verification. The workers were advised by the assessor to be retested within 3 months of the initial testing, 11/02/2021.</p> <p>Maran Estate</p> <p>1. HIRARC was available to assess all risks associated to the activities in the estate. The HIRARC is reviewed on a yearly basis with the last review conducted on 09/07/2020 by the management of the estate. Among the activities highlighted in the HIRARC are Harvesting, Spraying, Driving Tractor, Collecting Loose Fruits and Water Pump House Operations.</p> <p>2. Chemical Health Risk Assessment has been conducted to assess the risks associated to hazardous chemicals that are used in the estate. The CHRA assessment was conducted on 03/07/2020 by DOSH registered assessor [JKPP IH 127/171-2(08)], Occumed Consultancy & Services Sdn Bhd. The CHRA Report was available for verification. There were 2 updates done for the CHRA on 10/12/2019 and 01/03/2020 due to</p>	
--	--	---	--

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>additional chemicals used in the estate. The updated CHRA reports were available in the estate for verification.</p> <p>3. Noise Risk Assessment was conducted in Maran Estate as required by DOSH under the Occupational Safety and Health (Noise Exposure) 2019 on 08/09/2020 by Alam Hijau Integrasi (M) Sdn Bhd. The draft report (Report Number: NRA2009xx) was available for verification by NRA Registered Assessor (NRA Registration: HQ/15/PEB/00/146).</p> <p>Asia Palm Oil Estate</p> <p>1. HIRARC was used to identify all risks associated to the activities in the estate. The latest review was conducted on 07/12/2020 for Trunk injection Operation. The harvesting Operation HIRARC was reviewed on 21/01/2020 due to a related accident that occurred on 20/01/2020.</p> <p>2. Chemical Health Risk Assessment was conducted to assess the health risk associated to the hazardous chemicals used in the estate. The assessments were conducted by Occumed Consultancy & Services Sdn Bhd on 13/01/2017 by DOSH registered assessor [JKKP IH 127/171-2(08)].</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>The effectiveness of the H&S is monitored through the checklists available in the estates and mills via the Work Site Inspection. The findings of the WSI is submitted on a quarterly basis to the Head Quarters and also discussed at the quarterly OSH Meetings in the estates and mill for the attention of the management and further improvements. The estate and mills also have checklist to monitor the usage of PPE. OSH Training Programme are in place to ensure regular trainings are conducted in line with the HIRARC requirement.</p>	Complied

Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.																	
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>A training programme has been developed and available in the Training Plan for Operating Units (Mills & Estate) 2020/2021. The trainings were sighted to have included Gender Specific Training and involves staffs and workers.</p> <p>Covid-19 training and briefings were sighted at the mill and estates. Interview with the workers and staff indicated that they were aware on the SOP during the RMCO/MCO such as social distancing, regular sanitization and use of PPE (Face Mask).</p>	Complied														
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Records of trainings were maintained by the Mill and all estates as below:</p> <p>Carotino POM</p> <table border="1" data-bbox="1153 879 1930 1294"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Training on SOP at Processing Station</td> <td>14/10/2020</td> </tr> <tr> <td>Training on SOP at Biogas Plant</td> <td>30/09/2020</td> </tr> <tr> <td>Training on SOP at Grading Station</td> <td>07/09/2020</td> </tr> <tr> <td>Training on Outsourcing Activities</td> <td>13/05/2020</td> </tr> <tr> <td>Training on Mechanism on Handling Non-Conforming Products</td> <td>23/04/2020</td> </tr> <tr> <td>Training on SOP for Effluent Treatment & Effluent Tertiary Plant</td> <td>16/03/2020</td> </tr> </tbody> </table> <p>Maran Estate</p>	Training	Date	Training on SOP at Processing Station	14/10/2020	Training on SOP at Biogas Plant	30/09/2020	Training on SOP at Grading Station	07/09/2020	Training on Outsourcing Activities	13/05/2020	Training on Mechanism on Handling Non-Conforming Products	23/04/2020	Training on SOP for Effluent Treatment & Effluent Tertiary Plant	16/03/2020	Complied
Training	Date																
Training on SOP at Processing Station	14/10/2020																
Training on SOP at Biogas Plant	30/09/2020																
Training on SOP at Grading Station	07/09/2020																
Training on Outsourcing Activities	13/05/2020																
Training on Mechanism on Handling Non-Conforming Products	23/04/2020																
Training on SOP for Effluent Treatment & Effluent Tertiary Plant	16/03/2020																

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

Training	Date
Sprayers Training – Chemical Handling, PPE, Premixing, Triple Rinse, Chemical Identification and River Buffer Zone.	23/03/2020
Manuring Training – Buffer Zone, PPE and Calibration.	26/03/2020
Harvesting Training – SOP and PPE	16-18/06/2020
Triple Rinsing Training	06/07/2020
Recycling Training – Line Sweeper	02/02/2020
Rat Baiting Training	14/12/2020
Store Clerk Training	05/11/2020
Tractor Training	10/12/2020
Open Burning Training	02/02/2020
Genset/Water pump Operator Training	25/07/2020
Training	Date
HCV & Buffer Zone Training	25/11/2020
Traceability Training	27/07/2020
Loose Fruit Picking Training	16/10/2020
Security Main Gate Management Training	18/10/2020
P&D Spaying Training	08/10/2020

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<table border="1"> <tr> <td>Spraying Training</td> <td>02/09/2020</td> </tr> <tr> <td>Harvesting & PPE Training</td> <td>17/08/2020</td> </tr> </table>	Spraying Training	02/09/2020	Harvesting & PPE Training	17/08/2020	
Spraying Training	02/09/2020						
Harvesting & PPE Training	17/08/2020						
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>Training on SCCS was conducted in various sessions based on job area of the personnel, e.g.:</p> <ul style="list-style-type: none"> • 3/10 and 14/10/2020 – training to supervisor on milling process • 15/4/2020 – training on ordering transportation (FFB, CPO & PK) • 24/3/2020 – CPO dispatch • 21/1/2020 – CPO & PK monitoring on real-time basis 	Complied				
<p>Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C). However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>							
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Carotino Palm Oil Mill only receives certified FFB. Therefore, qualifies for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.</p>	Complied				

3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. 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>	NA as Carotino POM opted for IP model.	Complied
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification 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.</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 (see Table 10).	Complied
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	The parent company (JC Chang Group) is the member of RSPO. Membership No.: 2-0029-06-000-00 since 5/3/2010. Palmtrace member ID: RSPO_PO1000000128 (Carotino Sdn Bhd).	Complied
3.8.5	<p>Documented procedures</p> <p>The mill 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"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) 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 	<p>Written documented procedures, Sustainable Mill SOP, for the chain of custody is with Identity Preserved (IP) model covering all the RSPO Supply Chain Certification Standard and Traceability for handling certified and noncertified FFB. The IP model is used since only certified FFB from own supply base is received and processed at Carotino Palm Oil Mill.</p> <p>Among the established SOP are:</p> <ol style="list-style-type: none"> 1. CCP/01-05/2019 (SOP at Reception Station) dated 15/07/2019. 2. CCP/08-07/2019 (SOP at dispatch CPO & PK), dated 15/07/2019. 3. SCC/10-05/2019-CPOM (SOP for RSPO SCC standard products 	Complied

	<p>to demonstrate awareness of the mill's procedures for the implementation of this standard.</p> <p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<p>calculation, dated 01/07/2019)</p> <ol style="list-style-type: none"> 4. Mechanism for Handling Non-Conforming FFB, CCP11-04/2019 dated 16/07/2019 5. SOP for reporting and documentation, CCP/12-43/2018. dated 10/07/2019. <p>The mill manager has overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. Based on interview with the mill manager, he was able to explain and demonstrate the implementation of the company's supply chain procedures. Sighted the appointment letter dated 07/07/2014, appointment as Sustainability Operation Manager, undersigned by the Mill Director.</p> <p>Carotino Palm Oil mill has documented procedures (as mentioned above for the incoming FFB, processing, ensuring no contamination and outgoing palm products (CPO and PK).</p>	
3.8.6	<p>Internal Audit</p> <ol style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: <ol style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management 	<p>Internal Control Assessment (Internal Audit) on Internal Control Assessment Checklist was conducted through remote audit by Internal Control Auditing Officer on 29/06/2020 till 30/06/2020. Due to the Covid-19 outbreaks and Movement Control Order (MCO), there was no site visit conducted for the audit. Thus, the audit was based on online verification only.</p> <p>The internal audit conducted was in accordance with the Internal Audit written procedure, Guideline for Internal Auditing and Management Review of the Sustainability and Supply Chain System; Doc Ref. No: T/001-03/2018; Subject: Audit Procedures & Management Review; Doc Date: 03/06/2018.</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	review at least annually. The mill shall maintain the internal audit records and reports.	The Internal Audit conducted conformed that implementation of RSPO SCCS were in accordance to the requirements therefore there were no non-conformity raised.	
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</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 estate's dispatch tickets is as follows:</p> <ul style="list-style-type: none"> • FFB Delivery Note No. • Estate's names • Date & time of delivery • Field 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 • Field No. • Name of driver • Vehicle no. • Weighbridge ticket no. • Date & time of delivery • Total bunches • Seal no. • Net weight 	Complied
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single</p>	<p>Carotino POM ensured the required information is available in document form. Sampled contract: CSPO/3291/11/20 (CSPO) and CA2929 (CSPK). Among the information available is:</p> <ul style="list-style-type: none"> • The name and address of the buyer 	Complied

	<p>document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol 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; RSPO certificate number; A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; A unique identification number. 	<ul style="list-style-type: none"> The name and address of the seller The loading or shipment/delivery date The date on which the documents were issued A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations) The quantity of the products delivered Any related transport documentation Supply chain certificate number of the seller A unique identification number - Available in a few documents e.g. DN no., seal no., etc. 	
<p>3.8.9</p>	<p>Outsourcing Activities</p> <ol style="list-style-type: none"> The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification The mill shall ensure the following: <ol style="list-style-type: none"> The mill has legal ownership of all input material to be included in outsourced processes The mill 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 mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. 	<p>Outsourcing activities in Carotino POM only involves transportation of products, i.e. CSPO and CSPK, subjected to the buyers' contractual requirements. Mostly delivered contracts involved CSPO and CSPK. Implementation for Outsourcing activities was based on the procedure System Management & Documentation; CCP14 Outsourcing Activities; Version 2 (CCP/14-02/2019) Document Date: 13/09/2019.</p> <p>The Procedure System Management & Documentation; CCP14 Outsourcing Activities; Version 2 (CCP/14-02/2019) Document Date: 13/09/2019 states that the site has legal ownership of all input materials to be included in outsourced processes</p> <p>The mill has established a Transportation Agreement with the outsourced transporter, Hup Shing Berjaya Enterprise, dated</p>	<p>Complied</p>

	<p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill 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 all information, when this is announced in advance.</p>	<p>01/08/2018, undersigned by the Transport and Carotino POM. There is an additional clause addendum dated 27/12/2019 stating that the transport shall at all times reserve the right of the CB to audit the outsourced contractor under SCCS (RSPO) and Requirement.</p> <p>The Procedure System Management & Documentation; CCP14 Outsourcing Activities; Version 2 (CCP/14-02/2019) Document Date: 13/09/2019 has been communicated internally and to the transporter on 01/01/2020.</p>	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Names and contact details of transporters used for the physical handling of RSPO certified oil palm products were recorded and registered in the mill supplier database system.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	Names and contact details of any new transporter used for the physical handling of RSPO certified oil palm products to be informed by mill supply chain PIC upon available.	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p>	<p>The mill is able to record and balance all its receipts of certified FFB and deliveries of certified CPO and PK through the utilization of its "Daily Production Figure" report. As at 20/1/2021:</p> <p>FFB processed = 423.52 mt</p> <p>B/f from 19/1: CPO = 1,054.10 mt, PK = 214.15 mt</p> <p>Produced: CPO = 78.79 mt, PK = 21.46 mt</p> <p>Dispatch: CPO & PK = 225.97 mt & 37.48 mt</p> <p>Balance: CPO = 906.92 mt, PK = 198.13 mt</p> <p>The records were on real-time basis.</p>	Complied

	<ul style="list-style-type: none"> a) 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. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock). 		
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Based on verification of FFB receipt records, it was confirmed that only certified source of FFB from own plantation were processed. Therefore, there was no mixing of non-certified FFB in production of CPO and PK.</p> <p>Processing and storage records can be traced back to only certified segregated FFB and finish product (CPO and PK) through traceability records such as weighbridge records and FFB dispatch chit. This ensures that 100% segregated materials are reached.</p>	Complied
3.8.16	<p>Registration of Transactions</p>	<p>Shipping announcement was found to be made accordingly. Among the announcements sampled were as follows:</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	<p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>TR-ff900cc4-9cc5 (dispatch on 1/12/2020, announced on 6/12/2020)</p> <p>TR-b702d4bf-ccc9 (dispatch on 27/11/2020, announced on 2/12/2020)</p>	
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.</p>	Complied
General corporate communications			
4.1	<p>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.</p>	<p>General Corporate Communications is managed at the HQ level.</p>	Not Applicable
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> 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. <p>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.</p>	<p>General Corporate Communications is managed at the HQ level.</p>	Not Applicable

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

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.	General Corporate Communications is managed at the HQ level.	Not Applicable
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.	General Corporate Communications is managed at the HQ level.	Not Applicable
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.	General Corporate Communications is managed at the HQ level.	Not Applicable
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.	Not Applicable as business to business communication is managed at JC Chang Group HQ level.	Not Applicable
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.	Not Applicable as business to business communication is managed at JC Chang Group HQ level.	Not Applicable
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: 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.	Not Applicable as business to business communication is managed at JC Chang Group HQ level.	Not Applicable

	b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.		
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.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable
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.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable
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.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable
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.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable
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.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable
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	Not Applicable as the facility does not involve with consumer end product.	Not Applicable

	<p>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.rsपो.org.</p>		
<p>MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES</p>			
<p>Certified oil palm content (IP)</p>			
	<p>For IP, 95% or above of the oil palm content must be RSPO IP-certified.</p>	<p>Carotino POM only receives FFB from its own certified estates and therefore the content of oil palm in its products is 100% RSPO IP-certified.</p>	<p>Complied</p>
	<p>For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.</p>	<p>Carotino POM only receives FFB from its own certified estates and therefore the content of oil palm in its products is 100% RSPO IP-certified.</p>	<p>Complied</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p>	<p>Carotino POM only receives FFB from its own certified estates and therefore the content of oil palm in its products is 100% RSPO IP-certified.</p>	<p>Complied</p>
<p>Labelling and trademark (IP)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p>	<p>Not Applicable as the facility does not use RSPO trademark label.</p>	<p>Not Applicable</p>

	<ul style="list-style-type: none"> • 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. 		
Messaging (IP)			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	Not Applicable as the facility does not use RSPO Messaging.	Not Applicable
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			

	95% or above of the oil palm content must be RSPO MB-certified.	NA	Not Applicable
	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	Not Applicable
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 the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 	NA	Not Applicable
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> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	NA	Not Applicable
<p>Principle 4: Respect community and human rights and deliver benefits</p>			
<p>Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	Carotino/JC Chang Group has established the Social & Human Rights Policy; Date: 14/11/2019; Signed by both Plantation Director and Mill Director respectively. The policy include prohibiting retaliation against HRD was documented and communicated as per sample records of policy briefing to all Carotino POM employees on 19/10/2020.	Complied
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	Based on the interview of internal stakeholders among workers as well relevant external stakeholders, the mill and estates within Carotino Production Unit (CPU) do not instigate violence or use any form of harassment in their operations.	Complied

Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the records of complaints and grievances no issue of whistle-blowing that requires anonymity of complainants and/or grievance parties. Interview conducted with internal stakeholders among workers and relevant external stakeholders also confirmed the information.</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>The procedures available as per documented SOP on Mechanisms for Communication and Consultation; Doc. Ref. # E/004-08/2019; Date: 12/8/2019 which were implemented by all estates and mill within CPU.</p> <p>Latest stakeholder meeting was conducted on 6/1/2021 held in combination by Carotino POM, Maran Estate, Pahang Oil Palm Estate 1 and Asia Oil Palm Estate 1. Previous meeting was conducted on 28/11/2019.</p>	Complied
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Request and response from internal & external stakeholders as per sample records sighted in the Sustainability Complaint/Suggestion/Grievance Monitoring Book. Sampled latest complaints received from internal stakeholders by Maran Estate was on 10/7/2019. Complaints resolved on 16/7/2019. Last requests received by Carotino external stakeholder was on 17/6/2018 which was responded and resolved on the same day. Requests made by authorities from DOSH was last received on 8/10/2020 during the mill inspection visit and from DOE on 9/10/2020.</p>	Complied
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p>	<p>All operating units within CPU implemented the conflict resolution mechanism based on the established SOP on Mechanism for Complaints and Grievances; Doc. Ref. # E/00107/2019; Doc. Date: 12/8/2019. The SOP stated that further arrangements to go for the independent arbitration will include the option of access to</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	- Minor compliance -	independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	Based on the interview of internal stakeholders among workers and relevant external stakeholders, contributions to community development are demonstrated. As per sample, contributions to local communities done by Carotino POM, Maran Estate for the year 2020/2021 including the following: <ul style="list-style-type: none"> - School children free bus transportation provision - School children education aid 2020 - Main access road maintenance & repair contribution - Chicken contribution to all employees during Hari Raya Haji 	Complied
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available. - Critical (Major) compliance -	CPU implemented the company's Guideline for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation Documents; Doc. Ref. # E/002-05/2019; Doc. Date: 12/8/2019 in case of land dispute issue occurs. Documents showing legal ownership available for Carotino POM that located within Pahang Oil Palm Estate 1 and owns a total of 2,153.10 ha under 9 titles. Sighted sample copy of land titles for Pahang Estate kept by the mill as following: <ul style="list-style-type: none"> - Title # 27263; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 23605; Area: 296.2 ha - Title # 27262; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 23604; Area: 202.6 ha 	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>- Title # 27260; District: Kuantan; Sub-district: Mukim Ulu Lepar; Lot # 23607; Area: 69.67 ha</p> <p>No issues of land dispute issue occur in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	No issues of land dispute issue occur in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	No issues of land dispute issue occur in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	No issues of land dispute issue occur in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.4.2c	Evidence that the legal, economic, environmental and social implications of 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 unit of certification's title, concession or lease on the land. - Minor compliance -	No issues of land dispute issue occur in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping	Land maps with appropriate scales showing estate's boundaries with neighbours in-line with area specified in individual land titles available. No customary land within and at the boundary of Maran	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	<p>involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>Estate. Neighbours surrounding Maran Estate mostly among mining operation company and oil palm plantation company as following samples:</p> <ul style="list-style-type: none"> - Bakti Juwita Sdn. Bhd.; neighbouring mining company - Monument Mengapur Mining; neighbouring mining company - Kema Development Sdn. Bhd.; neighbouring estate - Nik Hassan Bin Che The; restaurant/café - Wong Nyuk Lim; grocery shop 	
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>No issues of land dispute issue occur in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Not Applicable
4.4.5	<p>(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>No issues of land dispute issue occur in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Not Applicable
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>No issues of land dispute issue occur in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Not Applicable
<p>Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>No new planting and issues of customary land occurs in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Not Applicable

4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting and issues of customary land occurs in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Not Applicable
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occurs in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Not Applicable
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occurs in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Not Applicable
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occurs in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Not Applicable

4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	No new planting and issues of customary land occurs in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	No new planting and issues of customary land occurs in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
Criterion 4.6: 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.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	No new planting and issues of customary land occurs in all estates within CPU that requires FPIC process since the last audit.	Not Applicable

		Consultation with relevant stakeholders conducted on-site confirmed the information.	
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	No new planting and issues of customary land occurs in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -	No new planting and issues of customary land occurs in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
Criterion 4.8: 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.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition	No new planting and issues of customary land occurs in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable

	is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -		
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	No new planting and issues of customary land occurs in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	No new planting and issues of customary land occurs in all estates within CPU that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	NA as Carotino POM does not have FFB suppliers from smallholders.	Not Applicable

5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	NA as Carotino POM does not have FFB suppliers from smallholders.	Not Applicable
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	NA as Carotino POM does not have FFB suppliers from smallholders.	Not Applicable
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	NA as Carotino POM does not have FFB suppliers from smallholders.	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	NA as Carotino POM does not have FFB suppliers from smallholders.	Not Applicable
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	NA as Carotino POM does not have FFB suppliers from smallholders.	Not Applicable
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	NA as Carotino POM does not have FFB suppliers from smallholders.	Not Applicable
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control	NA as Carotino POM does not have FFB suppliers from smallholders.	Not Applicable

	system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -		
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	NA as Carotino POM does not have FFB suppliers from smallholders.	Not Applicable
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	NA as Carotino POM does not have FFB suppliers from smallholders.	Not Applicable
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	NA as Carotino POM does not have FFB suppliers from smallholders.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	NA as Carotino POM does not have FFB suppliers from smallholders.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	NA as Carotino POM does not have FFB suppliers from smallholders.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.	NA as Carotino POM does not have FFB suppliers from smallholders.	Not Applicable

	- Minor compliance -		
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	<p>(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>CPU implemented the company's Equal Opportunity Policy; Date: 12/8/2019; Signed by both Plantation Director and Mill Director respectively. Regular briefing also conducted to all employees as per sample sighted for Sustainability awareness – Company Policy (OSH, Social & Human Right, Equal Opportunity, Environmental, Corruption Prevention, Sexual Harassment, Reproductive Right; Date: 19/10/2020.</p>	Complied
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>Records of employments and interview conducted on-site with sampled internal and external stakeholders confirmed that the workers and groups including local communities, women, and migrant workers have not been discriminated against.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>CPU implemented its recruitment based on the company's Guidelines on Procedure of Recruitment, Selection, Hiring, Promotion, Retirement and Termination; Doc. Ref. # E020-01/2019; Doc. Date: 12/08/2019. Sighted sample advertisements and records of new employee's recruitments as well as promotion of exiting employees confirmed that it was based on skills, capabilities, qualities and medical fitness necessary.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Pregnancy test latest conducted for Carotino POM employee on July 2019. 2 female employees whom work as lab attendant were selected for the pregnancy test to ensure that they will be relocated to work that not involve chemical handling upon confirmation of pregnancy. Based on request, the female employee also do not need to undergo the test if it caused discomfort among them.</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>Gender committee available in all operating units within APU where the committee members responsible to raise awareness, identify and address issues of concern as well as opportunities and improvements for women through various activities and events. Sighted sample minutes of meeting records for gender committee meeting for Maran Estate latest conducted on 20/12/2020. Carotino POM gender committee meeting latest conducted on 21/12/2020.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>Evidence of equal pay for the same work scope available based on the payroll system i.e. LintraMax Plantation Director; Worker Payslip Listing (Detail payslip with piece-rate work price) as per sample sighted in indicator 6.2.2 below.</p>	Complied
<p>Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Collective agreements and documentations of pay and conditions available to the workers for sample employees sighted as per indicator 6.2.2 below. Explanation made from time to time upon updates of salary related changes mainly the Minimum Wages Order as per sample sighted for Carotino POM briefing of Minimum Wages and Method of Wages Payment dated on 2/3/2020 by the mill management.</p>	Complied
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Employment contracts detailing payments and conditions of employment available to the workers for sample employees sighted as per following:</p> <p>Maran Estate:</p> <ul style="list-style-type: none"> - Employee ID # MOP0095; Post: Excavator Operator; Date joined: 13/10/2004; Nationality: Malaysia 	Complied

**RSPO P&C Public Summary Report
Revision 11 (Sept 2020)**

		<ul style="list-style-type: none"> - Employee ID # MR100373; Post: General Worker; Date joined: 9/12/2017; Nationality: Malaysia - Employee ID # MR100421; Post: General Worker; Date joined: 3/10/2018; Nationality: Malaysia - Employee ID # MR100380; Post: General Worker; Date joined: 1/3/2018; Nationality: Malaysia - Employee ID # MR100069; Post: General Worker; Date joined: 28/9/2012; Nationality: Indonesia - Employee ID # MR100169; Post: Harvester; Date joined: 25/9/2014; Nationality: Indonesia - Employee ID # MR100364; Post: Loose Fruit Collector; Date joined: 19/11/2017; Nationality: Indonesia - Employee ID # MR100406; Post: Harvester; Date joined: 15/9/2018; Nationality: Indonesia - Employee ID # MR100457; Post: Harvester; Date joined: 19/5/2019; Nationality: Indonesia - Employee ID # MR100479; Post: Loose Fruit Collector; Date joined: 18/1/2020; Nationality: Indonesia <p>Carotino POM:</p> <ul style="list-style-type: none"> - Employee ID # G0084; Post: Security Guard; Date joined: 14/3/1983; Nationality: Malaysia ### information in Personal Particulars form and Perjanjian Pekerjaan (Tempatan) Appendix 1 dated 15/10/2015 not tally with pay rate & allowance shown 	
--	--	---	--

**RSPO P&C Public Summary Report
Revision 11 (Sept 2020)**

		<p>in payslip (details of changes on terms and conditions of employment not updated)</p> <ul style="list-style-type: none"> - Employee ID # G0311; Post: General Worker; Date joined: 22/8/2017; Nationality: Malaysia - Employee ID # G0342; Post: General Worker; Date joined: 15/7/2019; Nationality: Malaysia - Employee ID # G0358; Post: Operator; Date joined: 4/9/2020; Nationality: Malaysia - Employee ID # G0130; Post: General Worker; Date joined: 9/7/2011; Nationality: Myanmar - Employee ID # G0199; Post: Operator; Date joined: 3/7/2013; Nationality: Nepal - Employee ID # G0299; Post: Operator; Date joined: 4/5/2017; Nationality: Nepal - Employee ID # G0290; Post: Operator; Date joined: 4/5/2017; Nationality: Nepal - Employee ID # G0322; Post: Operator; Date joined: 2/11/2017; Nationality: Nepal <p>Asia Oil Palm Estate 1:</p> <ul style="list-style-type: none"> - Employee ID # AOP1277; Post: Night Watchman; Date joined: 26/11/2010; Nationality: Malaysia - Employee ID # AOP1459; Post: Loose Fruit Picker; Date joined: 25/2/2019; Nationality: Malaysia 	
--	--	--	--

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<ul style="list-style-type: none"> - Employee ID # AOP1525; Post: Gardener; Date joined: 17/7/2019; Nationality: Malaysia - Employee ID # AOP1520; Post: Loose Fruit Picker; Date joined: 9/4/2019; Nationality: Malaysia - Employee ID # AOP1548; Post: Excavator Driver; Date joined: 24/1/2020; Nationality: India - Employee ID # AOP1483; Post: Harvester; Date joined: 17/3/2019; Nationality: Indonesia - Employee ID # AOP1409; Post: Manuring; Date joined: 2/5/2019; Nationality: Bangladesh - Employee ID # AOP1329; Post: Mini Tractor Driver; Date joined: 4/9/2020; Nationality: Indonesia - Employee ID # AOP1258; Post: Loose Fruit Picker; Date joined: 23/7/2010; Nationality: Indonesia - Employee ID # AOP1372; Post: Harvester; Date joined: 4/8/2017; Nationality: Nepal 	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Records of payslip and check-roll documents available to the workers for sample employees sighted as per indicator 6.2.2 above shown evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p>	Complied
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on</p>	<p>Adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities in compliance with the Workers Minimum Housing and Amenities Standard Act 1990 provided by the company as evidence from the site visit. Regular monitoring also</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	<p>Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>conducted as per sample records of latest housing inspection in Maran Estate dated on 13/1/2021. Previous inspection was done on 5/1/2021.</p> <p>Latest housing inspection by Carotino POM was conducted on 12/1/2021. Appointed person in-charge for line site inspection in Carotino POM was Mohd. Naim bin Azmi; Staff of Carotino POM as per letter dated 1/112020.</p> <p>Appointed person in-charge for line site inspection in Maran Estate was Eswaran A/L Bala; Field Conductor of Maran Estate as per letter dated 6/7/2020.</p>	
<p>6.2.5</p>	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Based on the established as Environmental and Social Improvement Plan – West (Pahang); Doc. Ref. # N/009-02/2019; Date: 21/11/2019. Aspect identified on following:</p> <ul style="list-style-type: none"> - Local food and water security; Impact identified only Deterioration of local food and water source with action plan that all stakeholders be consulted and informed prior the planning on the kind, type of project and impact of the project as well as the rules of the activity through participation at all stages of the project cycle. Program include conduct stakeholder visit to the affected parties & all records of consultation, resolution and compensation should be properly documented and filed - Food price identified in fair pricing: Lack of monitoring system of shop prices for impact good sold at high price compare to outside market – action plan shop price monitoring on monthly basis; method monitor shop price and compare with nearest shop in an appropriate interval; if prices higher than rate stated in contract agreement, perform consultation with shop owner; if still high next month issue letter; if not improve, renewal to be considered; Action plan review shop price are monitored monthly basis and any dissatisfaction can bring forward to management 	<p>OFI</p>

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>thru complaint and action will be taken; Time frame continuous process; PIC AO/Manager/AM; Further actions required after review – Complaint will be investigated until resolved</p> <p>Maran Estate & Carotino POM workers complained on high price while being interviewed. Latest plan management review conducted on 21/11/2019 – plan implemented for 2 years until 20/11/2021 before being review again. However, identified aspect in the established as Environmental and Social Improvement Plan – West (Pahang); Doc. Ref. # N/009-02/2019; Date: 21/11/2019 related to fair pricing of food price could be further improved on pricing of non-tenanted grocery shop and or café operators to ensure workers' access to adequate, sufficient and affordable food continuously improving.</p> <p>Thus, an OFI has been raised on the matter.</p>	
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p>	<p>Carotino/JC Chang Group paid higher Prevailing Wage compare to the mandatory Minimum Wage Order 2020 based on the assessment documented in the Implementation Plan for Decent Living Wage (DLW); Doc. Ref. # E/027-01/2019; Doc. Date: 29/11/2019. The DLW assessment in the plan covers whole operating units in Peninsular Malaysia and Sabah. As an average, the Prevailing Wage for CPU is RM 2,049.71/month.</p>	Complied

	<p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p>	<p>Employment contracts detailing payments and conditions of employment available to the permanent workers employed as per</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	- Minor compliance -	samples sighted in indicator 6.2.2 above. No casual, temporary and day labour employed within all operating units within CPU.	
Criterion 6.3: The unit of Certification 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.			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	A statement on recognising freedom of association was published in the Social & Human Rights Policy; Date: 14/11/2019; Signed by both Plantation Director and Mill Director respectively. The policy stated that the management will respect the right of employees to join any association freely. Regular briefing also conducted to all employees as per sample sighted for Carotino POM on 1/12/2020.	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request as per samples sighted as following:</p> <ul style="list-style-type: none"> - Maran Estate JCC meeting latest conducted on 23/12/2020. - Carotino POM JCC meeting latest conducted on 22/12/2020. 	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	Based on the interview conducted with the workers' representatives and records of JCC election at all operating units within CPU, it was confirmed that management does not interfere with the formation or operation of the workers committee. Selection of workers' representatives were last conducted on 1/2/2016 through open ballot session. Voted candidates will represent all workers from each nation.	Complied
Criterion 6.4: Children are not employed or exploited.			

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>A formal policy for the protection of children, including prohibition of child labour was in place as Children Protection Policy; Date: 20/2/2020; Signed by both Plantation Director and Mill Director respectively. Children Protection Policy also extended to all external stakeholders mainly among vendors of CPU. Sighted sample records of Sustainability Compliances Contract with Operating Unit; Doc. Ref. # E023-01/2019; Doc. Date: 12/8/2019; undertaken by spare part supplier of Carotino POM i.e. YCB Industrial Supplies Sdn. Bhd.</p>	Complied
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>Records of employee master lists for sampled estates and mill within CPU shown the birth date of them that indicated the minimum age requirements are met. The documented Guidelines on Procedure of Recruitment, Selection, Hiring, Promotion, Retirement and Termination has specified the screening verification procedure which able to be done via HR computer system which will trigger alarm if underage worker data keyed-in the database.</p>	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the interview and employees master lists data, no young person below 18 years old employed within all operating units within CPU.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>Interview conducted on-site with sampled internal and external stakeholders confirmed that the information on no child labour policy and the negative effects of child labour were provided in appropriate languages and accessible to them. Records of communication also available as per sample sighted for spare parts supplier of Carotino POM i.e. YCB Industrial Supplies Sdn. Bhd.</p>	Complied
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>CPU implemented the company's Sexual Harassment Policy; Date: 1/7/2012; Signed by both Plantation Director and Mill Director respectively. Latest internal communication was done as per sample</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		briefing by Carotino POM to all its employees conducted on 1/12/2020.	
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	CPU implemented the company's Guideline on Reproductive Rights; Doc. Ref. # E/015-02/2015; Doc. Date: 5/11/2015 established by Plantation Department, Head Office. Latest internal communication was done as per sample briefing by Carotino POM to all its employees conducted on 1/12/2020.	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	New mothers' assessment was conducted by gender committee representatives as per records of gender committee meeting sample minutes of meeting records for gender committee meeting for Maran Estate latest conducted on 20/12/2020. Carotino POM gender committee meeting latest conducted on 21/12/2020.	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Interview conducted on-site with sampled internal stakeholders among all workforce confirmed that the information on grievance mechanism, which respects anonymity and protects complainants where requested, is established and communicated to them.</p> <p>No grievance issues that requires the implementation of the mechanism occurs in all operating units within CPU since the last audit.</p>	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime 	Employment contracts detailing payments and conditions of employment available to the workers for sample employees sighted as per indicator 6.2.2 above. Each employment contracts were agreed and signed by both employee and employer which confirmed that all work is voluntary and force labour are prohibited.	Complied

	<ul style="list-style-type: none"> • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>		
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>CPU implemented the Guidelines on Workers Employment for Casual or Temporary Employee; Doc. Ref. # E/021-01/2018; Doc. Date: 15/11/2018 in case of any temporary or migrant workers are employed. Records of employment shown no temporary or migrant recruitment take place since last audit.</p>	Complied
<p>Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p><u>Carotino POM</u></p> <ol style="list-style-type: none"> 1. The Mill Manager, Mr. Kenny Alvin Ligunjang was appointed as the OSH Committee Chairman, responsible for all issues and concerns pertaining to OSH in the mill. The Health and Safety Committee were also appointed which included the vice chairman, secretary, management representatives and workers representatives. 2. Regular OSH Meetings were conducted in the mill with participations from the management and workers representatives. Among the agendas discussed were Osh Plan 2020/2021, Training Plan 2020/2021, Workplace Trainings, PPE, Workplace Inspection, Machinery Inspection, JKKP 8 Submission and Accident Reports for the year 2020. The latest Meeting Minutes was available for verification dated 19/12/2020. 	Complied

		<p><u>Maran Estate</u></p> <ol style="list-style-type: none"> 1. The OSH Committee Members have been appointed to include the Chairman, Secretary, Management Representative and Workers Representative. The OSH Committee Organizational Chart was seen to be displayed at the office and stores. The Estate manager has been appointed as the Chairman of the OSH Committee in Maran Estate as stated in the appointment letter dated 01/06/2018 undersigned by the Regional Controller. The appointment letter of the manager together with all other committee members were available for verification. 2. Occupational Health & Safety Meetings are conducted regularly in the estate with representatives from the workers and management to address all issues related to workers health and safety. The latest OSH Meeting Minutes verified was dated 24/09/2020, 25/06/2020 and 25/03/2020. <p><u>Asia Palm Oil Estate</u></p> <ol style="list-style-type: none"> 1. The Estate Manager was appointed as the Osh Chairman as verified in the appointment letter dated 01/07/2019 undersigned by the Senior Manager. The OSH Committee was formed, and the Organization Chart was available to include the Chairman, Secretary, Staff Committee Members and Worker Committee Members. 2. Occupational Health & Safety Meetings are conducted regularly in the estate with representatives from the workers and management to address all issues related to workers health and safety. The latest OSH Meeting Minutes verified was dated 07/12/2020 and 14/09/2020. 	
--	--	--	--

<p>6.7.2</p>	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p><u>Carotino POM</u></p> <ol style="list-style-type: none"> 1. First Aid Box and trained first aiders were present in the mill during the site visit at locations such as office, ramp, stores and boiler station. Interview with the first aiders indicated they were well aware on the necessary precautionary measures to be taken during emergencies. Fire extinguishers were placed around the mill and monitored on a regular basis by the management. An Emergency Response Team have been created to handle emergency incidences such as fire outbreak or flood at the mill. Emergency Response Plan have been developed and placed at the notice boards at the mill which included ERP for fire, accident, flood and chemical spillage. Trainings have been conducted as below: <ul style="list-style-type: none"> - First Aid Training – 24/07/2020 - Fire Extinguisher Training – 24/07/2020 2. There were no accidents reported for the year 2020 and 2021 to date at the mill. Audiometric Test conducted reported that 3 workers were diagnosed to have Occupational Permanent Standard Threshold Shift. The mill management have reported the incidents to DOSH via JKPP 7 form. The JKPP 7 reports were available for verification. The JKPP 8 registration for the year end 2020 was submitted to DOSH on 13/01/2020 with the report available for verification. <p><u>Maran Estate</u></p> <ol style="list-style-type: none"> 1. Emergency Response Plans were available for Covid19/Pandemic, Accidents, Chemical Spillage, Flood, Fire, Poisoning and Attacked by venomous insect or animal. The ERP and Emergency Contact Numbers were seen to be displayed at the office and stores. Interview with the workers indicated that 	<p>Complied</p>
--------------	--	--	-----------------

		<p>all workers they are aware on the ERP and Emergency Contacts to be contacted during emergencies. Fire Fighting Training was conducted on 14/12/2020.</p> <ol style="list-style-type: none"> 2. First Aid Kits were available at the Spraying Gang, Harvesting Gang, Chemical Store, Workshop and Office. Interview with the First Aid Kit holders indicated that they were well trained on handling of the first aid kit items during emergencies. First Aid Training was conducted for all workers on 12/12/2020. 3. Records of all reported accident cases were maintained in the estate. A total of 9 accident cases were reported for the year 2020. Since there were no major accident cases preventing the worker to work for more than 4 days, there were no need for JKKP 6 to be raised. The JKKP 8 form for the year ending 2020 has been submitted to DOSH on 19/01/2020 and available for verification. <p><u>Asia Palm Oil Estate</u></p> <ol style="list-style-type: none"> 1. ERP was available for Chemical Spillage, Flood, Fire, Attack by Poisonous Animals, Storm, Riots and accidents placed at the stores and office signboards. Interview with the workers indicated that they understood the procedure that are applicable during emergencies. Fire Drill Training and ERP Training was conducted on 25/11/2020. 2. First Aid Kits were available at the operations during the site visit to the Spraying and Harvesting Gang. The first Aid Kit was also available at the stores and workshop. Interview with the workers indicated that they understood how to use the first aid 	
--	--	---	--

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>items during emergencies. First Aid Training was conducted on 18/09/2020</p> <p>3. Accident and incidents were recorded and maintained in the estate accordingly. There were 1 accident cases involving a harvesting worker for the year 2020. The accident investigation was done by the management and the JKKP 6 form was submitted to DOSH accordingly. There were 51 other minor accidents and incidents recorded in the estate with no loss of work days. There were no accident cases for the year 2021 as of to date.</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang and Manuring Gang and visit to the stores of the respective estates and mill, it was sighted that all required appropriate PPEs were worn by the personals.</p> <p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers were all in good working condition. Interview with workers indicated that they were all well aware that they have to sanitise themselves before returning home due to the hazard that the chemical residues could cause.</p>	Complied
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Medical care is provided to all the employees. Local workers and foreign workers were covered under SOCSO scheme. Sighted the contribution form (8A) for Oct 2020, Nov 2020 and Dec 2020 for all estate and mill visited as below.</p> <p>Carotino POM</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<table border="1"> <thead> <tr> <th>Month</th> <th>Total Workers</th> <th>Contribution</th> </tr> </thead> <tbody> <tr> <td>Oct 2020</td> <td>104</td> <td>4613.10</td> </tr> <tr> <td>Nov 2020</td> <td>102</td> <td>4412.40</td> </tr> <tr> <td>Dec 2020</td> <td>100</td> <td>4299.60</td> </tr> </tbody> </table> <p>Maran Estate</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Total Workers</th> <th>Contribution</th> </tr> </thead> <tbody> <tr> <td>Oct 2020</td> <td>159</td> <td>4148.20</td> </tr> <tr> <td>Nov 2020</td> <td>156</td> <td>3516.30</td> </tr> <tr> <td>Dec 2020</td> <td>149</td> <td>3436.80</td> </tr> </tbody> </table> <p>Asia Oil Palm Estate</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Total Workers</th> <th>Contribution</th> </tr> </thead> <tbody> <tr> <td>Oct 2020</td> <td>147</td> <td>4561.10</td> </tr> <tr> <td>Nov 2020</td> <td>143</td> <td>4290.50</td> </tr> <tr> <td>Dec 2020</td> <td>137</td> <td>3561.80</td> </tr> </tbody> </table>	Month	Total Workers	Contribution	Oct 2020	104	4613.10	Nov 2020	102	4412.40	Dec 2020	100	4299.60	Month	Total Workers	Contribution	Oct 2020	159	4148.20	Nov 2020	156	3516.30	Dec 2020	149	3436.80	Month	Total Workers	Contribution	Oct 2020	147	4561.10	Nov 2020	143	4290.50	Dec 2020	137	3561.80	
Month	Total Workers	Contribution																																					
Oct 2020	104	4613.10																																					
Nov 2020	102	4412.40																																					
Dec 2020	100	4299.60																																					
Month	Total Workers	Contribution																																					
Oct 2020	159	4148.20																																					
Nov 2020	156	3516.30																																					
Dec 2020	149	3436.80																																					
Month	Total Workers	Contribution																																					
Oct 2020	147	4561.10																																					
Nov 2020	143	4290.50																																					
Dec 2020	137	3561.80																																					
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Records on Lost Time Accident (LTA) metrics at mill/estates had been verified to be in satisfactory trending. JKPP 8 been submitted to DOSH annually.	Complied																																				

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		Operating Unit	2020		2021		
			Cases	Days	Cases	Days	
		Carotino POM	nil	nil	nil	nil	
		Maran Estate	9	12	nil	nil	
		AOP Estate	1	9	nil	nil	
Principle 7: Protect, conserve and enhance ecosystems and the environment							
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.							
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	The estates have implemented an IPM Plan Practices Through Monitoring, Prevention & Intervention. The plan has identified target pest such as Rats, Leaf – Eating Caterpillar and Rhinoceros Beetle. The intervention plans include providing barn owl boxes at ration of 1:20 ha and gradually increase to 1:10 ha and eventually 1:5 ha over time as the population of owl increases, cultivate beneficial plants for biological control of bagworms and other leaf eating caterpillar & erect pheromone traps along estate boundary where it is required.				Complied	
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	No species referenced in the Global Invasive Species Database and CABI.org were used within Carotino Production Unit.				Complied	
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	There is no use of fire for pest control treatment @ phyto-sanitation and in line with JC Chang’s Guidelines on Integrated Pest and Disease Management of Oil Palm, doc. ref. L/001-07/2019 dated 13/8/19 under section 6, Fire Control.				Complied	

Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.													
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>Justification for all pesticides used was stated in the SOP for Justifications for Pesticide Usage under IPM (Insecticide, Fungicide & Rodenticide) (B/008- 15/2019) and Justification for Weedicides Usage (B/009-13/2019); Document Date: 02/08/2019.</p> <p>The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimize effect on non-target species.</p>	Complied										
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Maran Estate</p> <ol style="list-style-type: none"> 1. Chemical Usage for Maran Estate was stated in the Agronomist Visit Report dated 07/12/2020. The Chemical Usage categorized by chemical used were shown in a Graph Chart for the Month of July 2019 to Nov 2020. 2. The active ingredient (a.i) were monitored for each chemical used in the estate against the total hectare coverage applied with the chemicals. Sampled the a.i/ha as below: <table border="1" style="margin-left: 40px;"> <tr> <td colspan="2">Chemical: Glyphosate (41.00 %)</td> </tr> <tr> <td>Jan 2020 – Mar 2020</td> <td style="text-align: center;">2.51</td> </tr> <tr> <td>Apr 2020 – Jun 2020</td> <td style="text-align: center;">3.56</td> </tr> <tr> <td>Jul 2020 – Sep 2020</td> <td style="text-align: center;">0.50</td> </tr> <tr> <td>Oct 2020 – Dec 2020</td> <td style="text-align: center;">0.39</td> </tr> </table> <p>Asia Oil Palm Estate</p>	Chemical: Glyphosate (41.00 %)		Jan 2020 – Mar 2020	2.51	Apr 2020 – Jun 2020	3.56	Jul 2020 – Sep 2020	0.50	Oct 2020 – Dec 2020	0.39	Complied
Chemical: Glyphosate (41.00 %)													
Jan 2020 – Mar 2020	2.51												
Apr 2020 – Jun 2020	3.56												
Jul 2020 – Sep 2020	0.50												
Oct 2020 – Dec 2020	0.39												

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>1. The 'Monitoring of Pesticide Usage' was done on a monthly basis to include the total a.i used. Records were available for verification as below:</p> <table border="1"> <tr> <td colspan="2">Garlon</td> </tr> <tr> <td>Jan 2020 – Mar 2020</td> <td>0.26</td> </tr> <tr> <td>Apr 2020 – Jun 2020</td> <td>0.19</td> </tr> <tr> <td>Jul 2020 – Sep 2020</td> <td>0.32</td> </tr> <tr> <td>Oct 2020 – Dec 2020</td> <td>0.24</td> </tr> </table>	Garlon		Jan 2020 – Mar 2020	0.26	Apr 2020 – Jun 2020	0.19	Jul 2020 – Sep 2020	0.32	Oct 2020 – Dec 2020	0.24	
Garlon													
Jan 2020 – Mar 2020	0.26												
Apr 2020 – Jun 2020	0.19												
Jul 2020 – Sep 2020	0.32												
Oct 2020 – Dec 2020	0.24												
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. - Critical (Major) compliance -</p>	<p>The estates have implemented an Integrated Pest Management Plan and a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan.</p> <p>Sighted during the site visit at the estate, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas.</p> <p>Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead.</p>	Complied										
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -</p>	<p>There is no prophylactic use of pesticides in all estates visited.</p>	Complied										
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and</p>	<p>Prohibited or banned pesticides by the Malaysian Pesticides Board is strictly barred by JC Chang Group. JC Chang Group only</p>	Complied										

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	<p>paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>purchases chemicals that are registered under the Malaysian Pesticides Act 1974 (Act 149) and Regulations.</p> <p>Sighted in the Chemical Registers showed that only class III & IV pesticides were used at the estates.</p> <p>During the site visit to the chemical stores it was justified that there were only class III and IV chemicals being used. Paraquat was eliminated. In its place, alternatives such as Glyphosate were used instead.</p>	
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers in the estate and mill.</p> <p>Sampled the training conducted for pesticide handlers as below: -</p> <p><u>Carotino POM</u> Chemical Handling, Spillage and Hazardous Chemical Exposure at Workplace Training – 09/08/2020</p> <p>Maran Estate Sprayers Training – Chemical Handling, PPE, Premixing, Triple Rinse, Chemical Identification and River Buffer Zone. – 23/03/2020</p>	Complied

		<p><u>Asia Palm Oil Estate</u> Spraying SOP Training – 09/10/2020 P&D Spraying Training – 08/10/2020</p>	
<p>7.2.7</p>	<p>(C) Storage of all pesticides is in accordance with recognised best practices. - Critical (Major) compliance -</p>	<p>At estates assessed the storage of pesticides was in accordance with the Occupational Safety and Health Act 1994 (Act 514), Regulations and Orders and Pesticides Act 1974 (Act 149) and Regulations. All information regarding the chemicals affixed as product label and the accompanying Safety Data Sheet (see OSH CLASS 2013 Regulations) with details of its usage, hazards, trade and generic names were made available at the chemical store and explained to the workers by Management.</p> <p>Chemical stores inspection noted the following being practised:</p> <ul style="list-style-type: none"> • All stores were secured under lock and key with only authorized personnel access. • Adequate Ventilation via ventilation fan. • Display of Safety Pictorial Posters, namely the required PPE and Chemical Safety Hazards Pictogram. • Pesticides were labelled and separated by class. • Daily balance of remaining chemicals after completion of pre-mixing were recorded, placed in secondary tray spill containment and kept in the same store under lock and key. • Concrete cemented floor, bund wall and provision of sump pond. Sump Pond was diverted to the field. • Store keeper was trained in the handling of all pesticides, for example, the precautions to store the heavy bulky 20-liter liquid container to be placed at the bottom on secondary tray containment and the smallest container on the top tier rack. 	<p>Complied</p>

7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>The estates uses the empty chemical containers as premix containers to transport chemical premix to the field for chemical spraying operations. Access excess used chemical containers are triple rinsed and punctured and then stored at the Empty Chemical Container Store. Visit to the store showed that all chemical containers stored were triple rinsed and punctured accordingly. The accumulated chemical containers are then disposed to through licensed waste collector. Verified the records of disposal as below:</p> <p><u>Maran Estate</u></p> <ul style="list-style-type: none"> • Waste Manager: Syarikat Hup Lee; • Date:17/02/2020; • Payment Voucher Number: 147076; • Materials: 20 Litres Container: 168 Units, 15 Litres Containers: 28 Units, 4 Litres Containers: 169 Units, 500 ml Containers: 171 Units and 500 g Containers: 435 Units. <p><u>Asia Oil Palm Estate</u></p> <ul style="list-style-type: none"> • Waste Manager: Indah Agro Sdn Bhd • Date: 19/01/2021 <p>Materials: 20 Litres Container: 27 Units, 25 Litres Containers: 12 Units, 4 Litres Containers: 36 Units, 500 ml Containers: 37 Units, 10kg containers: 9 units and 500 g Containers: 189 Units.</p>	Complied
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is</p>	<p>None observed at the assessed estates.</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	<p>provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>		
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Medical surveillance was conducted to all workers identified to be exposed to hazardous chemicals as recommended in the respective estates CHRA Report.</p> <p><u>Maran Estate</u></p> <p>Medical & Health Surveillance was conducted for 9 workers exposed to hazardous chemicals and fumes in the estate on 18/10/2020 by My Health Clinic, MH Wellness Group Sdn Bhd (Reg Number: JKPP HQ/19/DOC/00/00305). The Medical & Health Surveillance was done in accordance with the CHRA Report [CHRA Report Number: JKPP IH 127/171-2(08)]. The report indicated that all workers involved with the usage of organophosphate had normal results and were fit to work.</p> <p><u>Asia Oil Palm Estate</u></p> <p>Medical Surveillance was conducted for 5 workers identified to be exposed to hazardous chemicals on 18/10/2020. The medical surveillance was conducted by DOSH registered Assessor (DOSH Registration: JKPP HQ/19/DOC/00/00305) from My Health Clinic, MH Wellness Group. The results indicated all workers were fit to work with no health complications.</p>	Complied
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p>	<p>Verified at assessed estate's muster chit and employee records. Found no underage person, pregnant or breast-feeding women and other people that have medical restrictions working with pesticides. Medical surveillance record of those pesticides' operators were</p>	Complied

	- Critical (Major) compliance -	examined and all of them were certified fit with no detrimental to health by registered Occupational Health Doctor, HQ/16/DOC/00/454 from MY Health Clinic Kuantan.	
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented. - Minor compliance -	Wastes management plan is developed through the Environmental and Social Improvement Plan – West (Pahang). Generally, the scheduled wastes were disposed through licensed vendors, recyclable wastes through recycle centres and organic wastes through landfill. E.g. at Asia Oil Palm Estate, evidence of recycle wastes had been delivered to a recycle centre (Re Sheng Trading) can be seen through a receipt #167370, dated 27/10/2020. Among the wastes delivered were carton box, scrap iron, aluminium cans and plastic bottles.	Complied
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	Generally, the workers have demonstrated good understanding in proper disposal of wastes. The visited labour quarters were observed to be in clean condition. Wastes were properly disposed as mentioned in Indicator 7.3.1. Scheduled wastes were disposed through licensed contractors which were verifiable through eSwis. Examples of Consignment notes verified: Maran: #2020101617F8ZOV3 – SW305-dated 16/10/2020 #20201016175YPG0A – SW409-dated 16/10/2020 #20201016175JHCLA – SW410-dated 16/10/2020	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>Mill:</p> <p>#2020110708TKI2XW – SW404-dated 6/11/2020 #2020101710S1HEJ6 – SW409-dated 17/10/2020 #2020101710QI0HJC – SW410-dated 17/10/2020 #2020101710AO68GF – SW305-dated 17/10/2020</p> <p>Asia Oil Palm:</p> <p>#202010161N9OBEF – SW410-dated 16/10/2020 #202010161BDOWMI – SW305-dated 16/10/2020 #2020101616JY8MFI – SW409-dated 16/10/2020 #2020110722IEJSYB – SW404-dated 7/11/2020</p> <p>Landfill is used for disposal of wastes guided by “Guidelines on Garbage Disposal” [doc. No.: F/006-06/2016, dated 21/12/2016]. The landfills were located at the field. Based on visits at the sampled operating units, the landfill locations were found to be appropriate which is far from residential areas, waterways and flood prone areas.</p>	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	There was no wastes disposal by using open fire observed during the site visits.	Complied
<p>Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

<p>7.4.1</p>	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -</p>	<p>The assessed estates continued to use the JC Chang / Carotino established SOP- Methods of nutrient assessment for oil palm fertilizer recommendation (B/012-02/2012 guidelines for Compost Application (B/028-01/2017), Guidelines for Semi-Decomposed EFB Application (B/030-01/2019) and SOP-Soil and water conservation (C/002-01/2008).</p> <p>Soil analysis and foliar analysis are monitored on yearly basis by Agronomist. The recommendations for improvements are given to maintain the sustainable practices. They include use of chemical fertilizers, EFB and decanter cake. The visited estates Maran Estate and Asia Oil Palm Estate operate in accordance with the Agriculture Manual and standard operating procedures. The practices are consistently monitored by estate operation management and Regional Controller.</p>	<p>Complied</p>
<p>7.4.2</p>	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -</p>	<p>Maran Estate</p> <p>The latest foliar and soil sampling was conducted on 21/01/2020 by the Agronomist and available in the Agronomist Visit Report dated 07/12/2020 for verification. For the Foliar sampling, the summary of the annual mean leaf nutrient levels and distribution of total blocks for each nutrient classification status was available in the report. Soil sampling was carried out concurrently with the leaf sampling. A total of 7 blocks was sampled for the year. At each sampling point, sample is taken from frond heap and inter-row at depth of 0-15 cm and 15 – 30 cm. The status of soil chemical properties in each sampled block were presented in the agronomist report.</p> <p>Asia Oil Palm Estate</p>	<p>Complied</p>

		The latest foliar and soil sampling was conducted on 19/01/2020 conducted by Applied Agricultural Resources Sdn Bhd. The foliar and soil sampling were done to assess the nutrient content of the soil and palm and to guide the fertiliser application programme for the following year.	
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance -	<p>EFB application is done as part of nutrient recycling strategy. Records were well kept in the estate’s EFB Record Book and EFB Application Area File. Based on the records, the application of EFB in the field was in line with the SOP recommendation i.e. 40 mt/Ha. Verified the records as follows:</p> <p><u>Maran Estate</u></p> <ol style="list-style-type: none"> 1. Visit to Field PM 13A Block 5 exhibited that EFB has been used as a mulch where they are applied in between the palms. 2. Monthly EFB Application Records: <u>Field PM 13A</u> <ul style="list-style-type: none"> • October 2020: 14.48 mt/Ha, • November 2020: 18.59 mt/Ha, • December 2020: 21.85 mt/Ha. <p><u>Asia Oil Palm Estate</u></p> <ol style="list-style-type: none"> 1. Visit to Field PM 02A exhibited that EFB has been used as a mulch, where it is applied in heaps in between the palms. 2. Application from July 2020 till Dec 2020 was summarized to be at 40mt/Ha (17294 mt applied at 432.35 ha). 	Complied
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	<p>The records of fertilizers input were well maintained at the assessed estates. Among the records verified were:</p> <p><u>Maran Estate</u></p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<ol style="list-style-type: none"> 1. Program: Oct – Dec 2020; Field: PM 13A; Fertilizer: Kieserite; Total Ha: 177.26 ha; Total Bags: 723 Bags; Dosage: 1.50kg/Palm; Date Commenced: 05/01/2021; Date Completed: 15/01/2021 2. Program Oct – Dec 2020: Field: PM 15A; Fertilizer: NK Mix 11.6/27; Total Ha: 107.41 Ha; Total Bags: 730 Bags; Dosage: 2.75 kg/Palm; Date Commenced: 07/09/2020; Date Completed: 12/09/2020 3. Program Apr – May 2020: Field: PM 05A; Fertilizer: NK Mix 11.6/27; Total Ha: 118.03 Ha; Total Bags: 910 Bags; Dosage: 250g/Palm; Date Commenced: 24/12/2020; Date Completed: 30/12/2020 <p><u>Asia Oil Palm Estate</u></p> <ol style="list-style-type: none"> 1. Field: PM97A (Block A1); Total Ha: 65.07; Fertilizer: NK Mix; Total Bags: 472 Bags; Dosage: 2750 gram; Application Duration: 27/10/2020 till 06/11/2020; Status: Complete. 2. Field: PM98A (Block A2); Total Ha: 54.08; Fertilizer: NK Mix; Total Bags: 349 Bags; Dosage: 2500 gram; Application Duration: 12/11/2020 till 13/11/2020. 	
Criterion 7.5: Practices minimise and control erosion and degradation of soils.			
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Maps identifying Soil and terrain were available for both estates. The map was provided by Unit Pengurusan Dan Pemuliharaan Sumber Tanah Jabatan Pertanian Temerloh Pahang DM. Asia Oil Palm Estate had soils such as Alma, Holyrood, Rengam, Rasau, Tebok and Tawar among others. There were no soils classified as fragile or marginal in both estates visited.</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance -	Maps identifying slopes were available at the estates visited. Based on the maps provided it was verified that no replanting was done one steep slope above 25 degrees.	Complied
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No new planting of oil palm on steep terrain at both visited estates.	Complied
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	Referring to Indicator 7.5.1 above where soil series and terrain were analyzed, the long-term suitability of land for oil palm cultivation had been taken into account in plans and operations. Guided by the Agricultural Manual and company other SOPs, planting density, land clearing and preparation, leguminous cover plant, manuring, weeding, pest and disease, no planting on steep terrain and others were followed to optimise land usage.	Complied
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	There was no marginal nor fragile soil in estates audited.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Recent replanting was observed at Maran Estate. The soil map and topographic map prepared by Unit Pengurusan Dan Pemuliharaan Sumber Tanah Jabatan Pertanian Temerloh Pahang DM were sighted available at Maran Estate. It was noted that soil surveys, soil maps and topographic information and company SOPs have helped Maran Estate in planning replanting of oil palm. The effect of topography or local relief, soil parent material, and time on soil	Complied

		become apparent and significant in their land-use planning and resources studies. The topographic maps combined with soil maps helped in understanding soil and studying drainage, irrigation and hydrology. They provide insight to relief, slope and aspect of terracing required to plan resources for irrigation, drainage, FFB harvesting and evacuation, truck crops, roads and other infrastructure.	
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	There is no new planting reported and seen during site visit. Additionally, based on the soil map and observation during the site visit, there was no peat soil.	Complied
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -	This indicator is not applicable as there is no peat soil present within the certification unit.	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	This indicator is not applicable as there is no peat soil present within the certification unit.	Not Applicable
7.7.4	(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -	This indicator is not applicable as there is no peat soil present within the certification unit.	Not Applicable
7.7.5	(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting,	This indicator is not applicable as there is no peat soil present within the certification unit.	Not Applicable

	<p>as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>		
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	This indicator is not applicable as there is no peat soil present within the certification unit.	Not Applicable
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	This indicator is not applicable as there is no peat soil present within the certification unit.	Not Applicable
<p>Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.</p>			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p>	<p>Water management plan is in place and incorporated under Environmental and Social Improvement Plan – West Pahang, doc. ref. N/009-2/2019 dated 21/11/19 and "Water Management Plan for Carotino POM" dated 2/1/2021. The plan has included the availability of water sources and to avoid negative impacts on other</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	<p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>users in the catchment. No restriction of access to clean water or contribute to pollution of water used by communities.</p> <p>Access to clean water is adequately provided to workers for household consumption. Water quality is being monitored on once yearly basis to ensure water supply is safe for consumption.</p> <p>Latest tests were carried out on 7/8/2020 (Maran Estate), 3/12/2020 (Carotino POM) and 1/12/2020 (Asia Oil Palm Estate 1) by a 3rd party accredited laboratory (SAMM No. 127). The results showed that all parameter tested were within the Maximum Permitted Proportion (Schedule 25): Standard for Packaged Drinking and Vended Water under Food Act 1983 (ACT 281) and Regulations, 2013.</p>													
<p>7.8.2</p>	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>Guidelines on establishment of riparian buffer zone, doc. ref. C/001-03/2019, dated 27/4/19 in line with Department of Drainage and Irrigation's guidelines.</p> <p>Width of zones are guided by the followings:</p> <table border="1" data-bbox="1137 986 1825 1284"> <thead> <tr> <th>River width (m)</th> <th>Buffer zone width</th> </tr> </thead> <tbody> <tr> <td>> 40</td> <td>50</td> </tr> <tr> <td>20 to 40</td> <td>40</td> </tr> <tr> <td>10 to 20</td> <td>20</td> </tr> <tr> <td>5 to 10</td> <td>10</td> </tr> <tr> <td>< 5</td> <td>5</td> </tr> </tbody> </table> <p>Maran Estate</p>	River width (m)	Buffer zone width	> 40	50	20 to 40	40	10 to 20	20	5 to 10	10	< 5	5	<p>Non-compliance</p>
River width (m)	Buffer zone width														
> 40	50														
20 to 40	40														
10 to 20	20														
5 to 10	10														
< 5	5														

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>Water analysis for two main rivers i.e. Sg Ketapi and Sg Bekapor is done annually. The last report is dated 27/7/2020 [report no.: IE512/2020] by an accredited lab (SAMM No. 030) in accordance to "Guidelines on River Water Sampling Procedure" [C/011-01/2010, dated 4/2/2010]. Parameters tested were pH, BOD, COD, SS, AN and DO.</p> <p>Nonetheless, fertilizer (NK Mix) was found to be applied at some palms that stood very close (< 5 m) to Ketapi River at field no. 15A3, Maran Estate. This is not in-line with the requirement stated in the company's "Guidelines on Biodiversity Conversation Management Plan for Estates – WM" [doc. No.: C/006-01/2009, dated 20/2/2009], Clause 2.4 which reads, "All finalised buffer zones are to be subjected to 'do-nothing policy' i.e. no spraying and no manuring until they fully revert back to natural jungle conditions". Thus, a critical non-conformity report was assigned due to this lapse.</p> <p>Apart from that, the progress of "rehabilitation of riparian zone" can be further improved by stating the status clearly in the company's "Environmental and Social Improvement Plan - West (Pahang)" (OFI).</p>	
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>The mill applies the biological system with anaerobic lagoon 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. Based on quarterly report to the DOE, the mill has complied with the regulated limit.</p>	Complied
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>The mill has been monitoring its consumption of water on daily basis. Based on the daily records, the consumption is as follows: FY 19/20 = 1.24 m³/mt FY 20/21 = 1.19 m³/mt as at Dec 2020</p>	Complied

Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised			
7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>Plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented in "Renewable Energy Plan for Carotino Palm Oil Mill" dated 4/1/2021. Among the plans were:</p> <ul style="list-style-type: none"> • Control running of diesel engine • Optimise biogas engine energy • Reduce the shell usage for the boiler and increase the saving and sell • Increase fibre usage as biofuel to reduce the diesel consumption • Continue using the methane gas from biogas plant in biogas engine to generate electricity <p>At the estates, the plans were documented in "Energy Management Plan for FY 20/21". Among the plans established and implemented were:</p> <ul style="list-style-type: none"> • Regular maintenance of machinery and vehicles • Proper planning in allocating transportation works • Regular road maintenance 	Complied
Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>Identification of significant pollutants and greenhouse gas (GHG) emissions has been done e.g. POME, diesel/fuel and fertilizer. Their usage has been recorded and documented at each of the operating unit. The plan to reduce or minimise the GHG emission has been</p>	Complied

		<p>established and incorporated with its plan to prevent pollution. Among the action plans were:</p> <ul style="list-style-type: none"> To optimise the usage of diesel To ensure efficiency of ETP <p>Monitoring and reporting of the significant pollutants to water, gaseous emissions to air and contamination on land are in place. Tools and systems used include the DOE online CEMS monitoring for air emissions. Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 4 which is submitted to the RSPO Secretariat. Based on verification of various records e.g. Lintramax System, the data in the RSPO PalmGHG Calculator was accurate.</p>	
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development). - Critical (Major) compliance -</p>	<p>Not applicable since no new development by the certification unit.</p>	Not Applicable
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. - Critical (Major) compliance -</p>	<p>Other significant pollutants such as soil erosion, wastes water from operational activities (chemical) have been identified and documented in Environmental and Social Improvement Plan – West (Pahang), doc. ref. N/009-02/2019 dated 21/11/19. Implementation of plan is being monitored by appointed person in charge with target of time frame for completion.</p> <p>The mill has conducted its stack sampling at regulated frequency (twice a year) without fail. Based on the stack sampling reports [PE3-39/07/20 & PE3-39/07/20, dated 16/7/2020 and PE2-40/11/20 & PE3-40/11/20, dated 1/12/2020], the emission from the chimney were reported to be below the regulated limit i.e. 150</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		mg/m ³ where 112 mg/m ³ being the lowest and 134 mg/m ³ being the highest.	
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	Based on the visit at the replanting areas, there was no sign of fire being used for preparing the land.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	Fire prevention and control measures process is documented under Guidelines on Fire Prevention, Control and Stakeholder Engagement [doc. no.: M/017-03/2020 dated 17/1/2020.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	At Maran Estate, the adjacent stakeholders have been briefed about the Guidelines on Fire Prevention, Control and Stakeholder Engagement. Records of briefing were available whereby the stakeholders had signed the guideline as acknowledgment. At Asia Palm Oil Estate, the engagement was conducted through a meeting on 23/1/2020, chaired by the Estate Manager. Among the attendees were ADC Sdn Bhd and Mentiga Sdn Bhd. Minutes of meeting were well maintained for verification.	Complied
Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document. - Critical (Major) compliance -	Not applicable since there is no land clearing after November 2005.	Not Applicable

7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>A report entitled "A conservation assessment of Carotino's Peninsular Malaysian Estates – Conservation values and recommendations" dated 22 January 2008 by WildAsia was made available.</p> <p>The conservation assessor has recommended some programmes which are considered not only biodiversity protection within the identified key conservation areas, but also within the plantation landscape and areas beyond plantation boundaries. In general, among the recommendations are:</p> <ul style="list-style-type: none"> • Setting objectives <ul style="list-style-type: none"> - Conservation of natural areas - Enhance the plantation landscape - Assess plantation policies - Engaging others, educating and raising awareness • Conservation of Natural Areas • Enhancing local biodiversity within plantations • Assessing plantation policies • Education and awareness <p>No new planting after 15 November 2018 within Carotino Production Unit and no HCV area identified within the management unit.</p>	Complied
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not applicable.	Not Applicable
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in</p>	Not applicable since there is no land clearing after November 2005.	Not Applicable

	<p>consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>		
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	Not applicable since there is no land clearing after November 2005.	Not Applicable
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>Some RTE species have been identified to be present in the estates due to the location of the estates adjacent to Forest Reserve. Stated in the estate’s management plan, among the protection measures established were to create awareness, through regular training to workforce, to put up signage of “No Hunting” and regular monitoring of animal sightings.</p> <p>Maran – last training was conducted on 8/12/2020 to all workforce (about 130) during muster call.</p> <p>Mill – training is conducted from time to time. Last training was conducted on 1/11/2020 to 16 workforce during morning briefing.</p> <p>Content of the briefing is to inform the workforce not to capture, harm, collect, trade, possess or kill any wildlife regardless RTE or not. Poster from Wildlife department were available at strategic place for employees to refer.</p>	Complied

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

		<p>Asia Oil Palm Estate – last training was conducted on 23/12/2020 to all workforce (about 130) during muster call. The estate also has a log book to record any sighting of any animals regardless RTE or not.</p> <p>Records of training were well maintained by the operating units. Based on interview with workers, it was noted that they have a good understanding on the protection of RTE.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	Not applicable since there is no land clearing after November 2005.	Not Applicable
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	Not applicable since there is no land clearing after November 2005.	Not Applicable

Appendix B: Approved Time Bound Plan

No	Production Unit	Location	Status	TBP	Remarks
1	Asia Palm Oil Mill		Certified	Certified on 31/01/2013 Recertification completed in Nov 2019	
	i) Melewar Estate 2	Lahad Datu, Sabah			
	ii) Hwa Li Estate 3				
	iii) Asia Oil Palm Estate 2				
2	Melewar Palm Oil Mill	Lahad Datu, Sabah	Certified	Certified on 07/02/2014 Recertified in 2019	
	i) Gelora Estate				
	ii) Pahang Oil Palm Estate 2				
	iii) Pahang Oil Palm Estate 3				
	iv) Melewar Estate 1				
	v) Tye Yang Estate				
3	Carotino Palm Oil Mill		Certified	Certified on 27/02/2010 Recertified in 2020	
	i) Maran Estate	Kuantan, Pahang			
	ii) Asia Palm Oil Estate 1				
	iii) Hwa Li Estate 1	Segamat, Johor			
	iv) Hwa Li Estate 2				
	v) Pahang Oil Palm Estate 1	Kuantan, Pahang			
4	Takon Palm Oil Mill		Uncertified	Main assessment was conducted on 28/10/2019 – 02/11/2019	The last Production Unit namely Takon Production Unit have undergone RSPO main assessment on 28/10 to 1/11/19 with a positive result and the CB will recommend Takon Unit for RSPO certification. However the certificate is yet to be issued due to pending approval from RSPO on the concept note.
	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			

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2020 for Carotino Palm Oil Mill and supply base was calculated using the PalmGHG Calculator version 4.0. 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 data include CPO produced, PKO Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Nett GHG emitted in 2020 for Carotino Palm Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	2.31
PK	2.31

Extraction	%
OER	20.50
KER	4.64

Production	t/yr
FFB Process	139824.31
CPO Produced	28666.88
PKO Produced	6494.16

Land Use	Ha
OP Planted Area	9009.02
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
Total	9009.02

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	139997.69	1.00	0	0	0	0	139997.69	1.00
CO ₂ Emission from fertilizer	8083.80	0.06	0	0	0	0	8083.80	0.06
NO ₂ Emission from peat	0	0	0	0	0	0	0	0
NO ₂ Emission from fertilizer	4983.68	0.04	0	0	0	0	4983.68	0.04
Fuel Consumption	2903.61	0.02	0	0	0	0	2903.61	0.02
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-74909.98	-0.54	0	0	0	0	-74909.98	-0.54

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

Conservation Sequestration	0	0	0	0	0	0	0	0
Total	81058.79	0.58					81058.79	0.58

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	3029.55	0.02
Fuel Consumption	241.51	0
Grid Electricity Utilization	0	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	-3234.00	-0.02
Sales of EFB	0	0
Total	37.05	0

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	0
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 (%)	0
Divert to anaerobic diversion (%)	100

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	98
Divert to methane captured (flaring) (%)	2
Divert to methane captured (energy generation) (%)	98

Appendix D: Supply Chain Declaration

A. Monthly Records of Certified and Uncertified FFB Received since the last audit (Jan 2020 – Dec 2020)				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	Jan-20	6,717.01	-	6,717.01
2	Feb-20	10,398.73	-	10,398.73
3	Mar-20	12,598.84	-	12,598.84
4	Apr-20	14,255.48	-	14,255.48
5	May-20	13,356.86	-	13,356.86
6	Jun-20	15,698.24	-	15,698.24
7	Jul-20	13,804.10	-	13,804.10
8	Aug-20	15,452.53	-	15,452.53
9	Sep-20	16,944.58	-	16,944.58
10	Oct-20	16,665.73	-	16,665.73
11	Nov-20	13,991.36	-	13,991.36
12	Dec-20	12,600.61	-	12,600.61
	Total	162,484.07	-	162,484.07

B. Monthly Records of Certified CPO & PK since the last audit (Jan 2020 – Dec 2020)			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Jan-20	1,364.63	347.17
2	Feb-20	2,117.20	508.66
3	Mar-20	2,656.34	586.24
4	Apr-20	2,914.46	649.54
5	May-20	2,690.79	555.97
6	Jun-20	3,137.75	684.931
7	Jul-20	2,780.75	602.74
8	Aug-20	3,222.58	705.261
9	Sep-20	3,499.78	829.32
10	Oct-20	3,525.82	819.10
11	Nov-20	2,789.09	633.24
12	Dec-20	2,427.63	584.06

RSPO P&C Public Summary Report
Revision 11 (Sept 2020)

	Total	33,126.82	7,506.23
--	-------	-----------	----------

C. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any) (Jan 2020 – Dec 2020)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	Undisclosed buyer 1	-	2,176.27	-
2	Undisclosed buyer 2	-	26,722.90	-
3	Undisclosed buyer 3	-	-	3,800.00
4	Undisclosed buyer 4	-	-	2,975.46
	Total		28,899.17	6,775.46

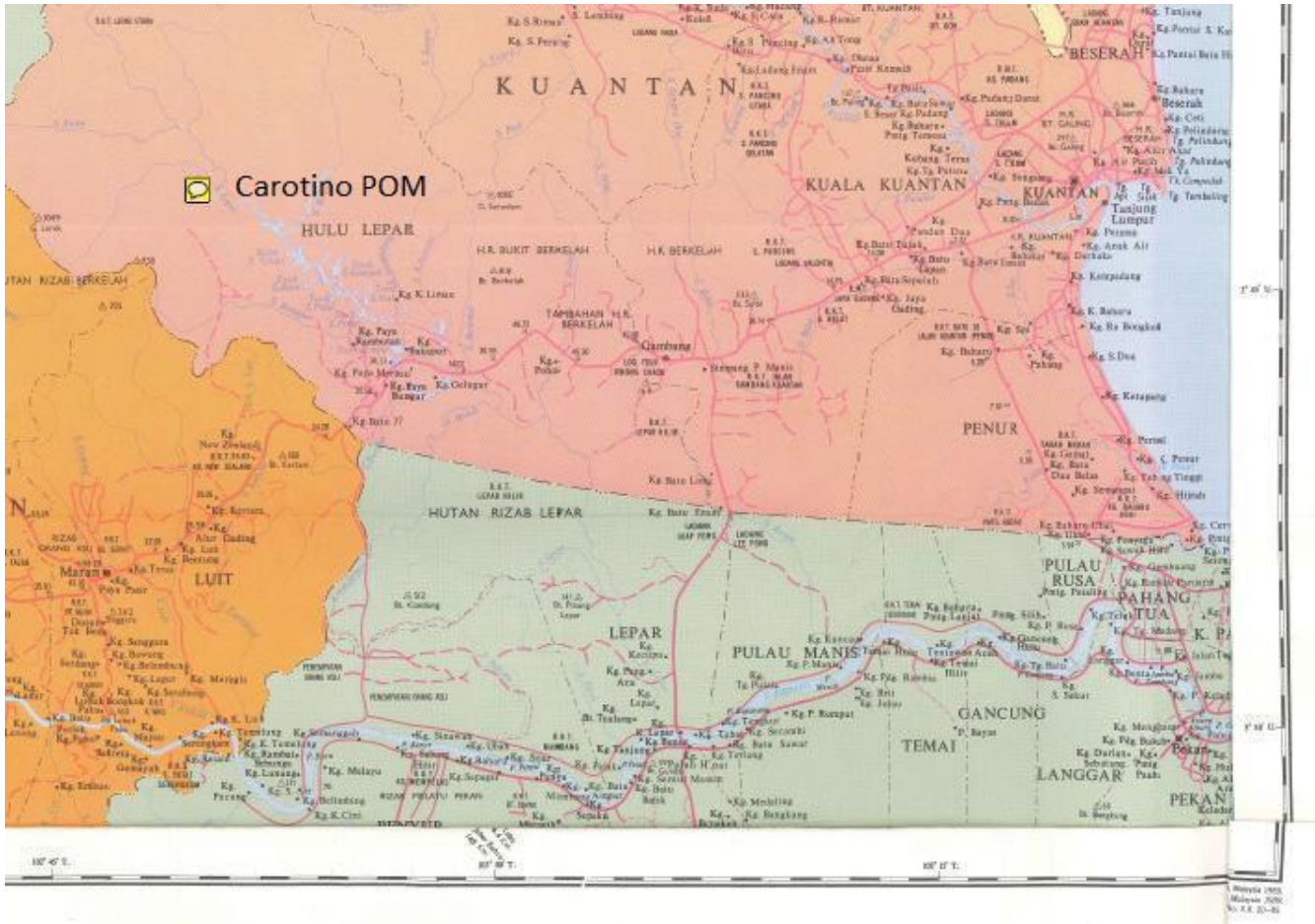
D. Records of CPO & PK Sold under other schemes since the last audit (if any) (Jan 2020 – Dec 2020)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	Undisclosed buyer 5	ISCC	3,411.10	-

E. Records of CPO & PK Sold as conventional since the last audit (if any) (Jan 2020 – Dec 2020)				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1	Undisclosed buyer 6	798.77	-	
2	Undisclosed buyer 7	-	407.02	
3	Undisclosed buyer 8	-	148.71	
	Total	798.77	555.73	

F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any) (Jan 2020 – Dec 2020)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
	Nil		

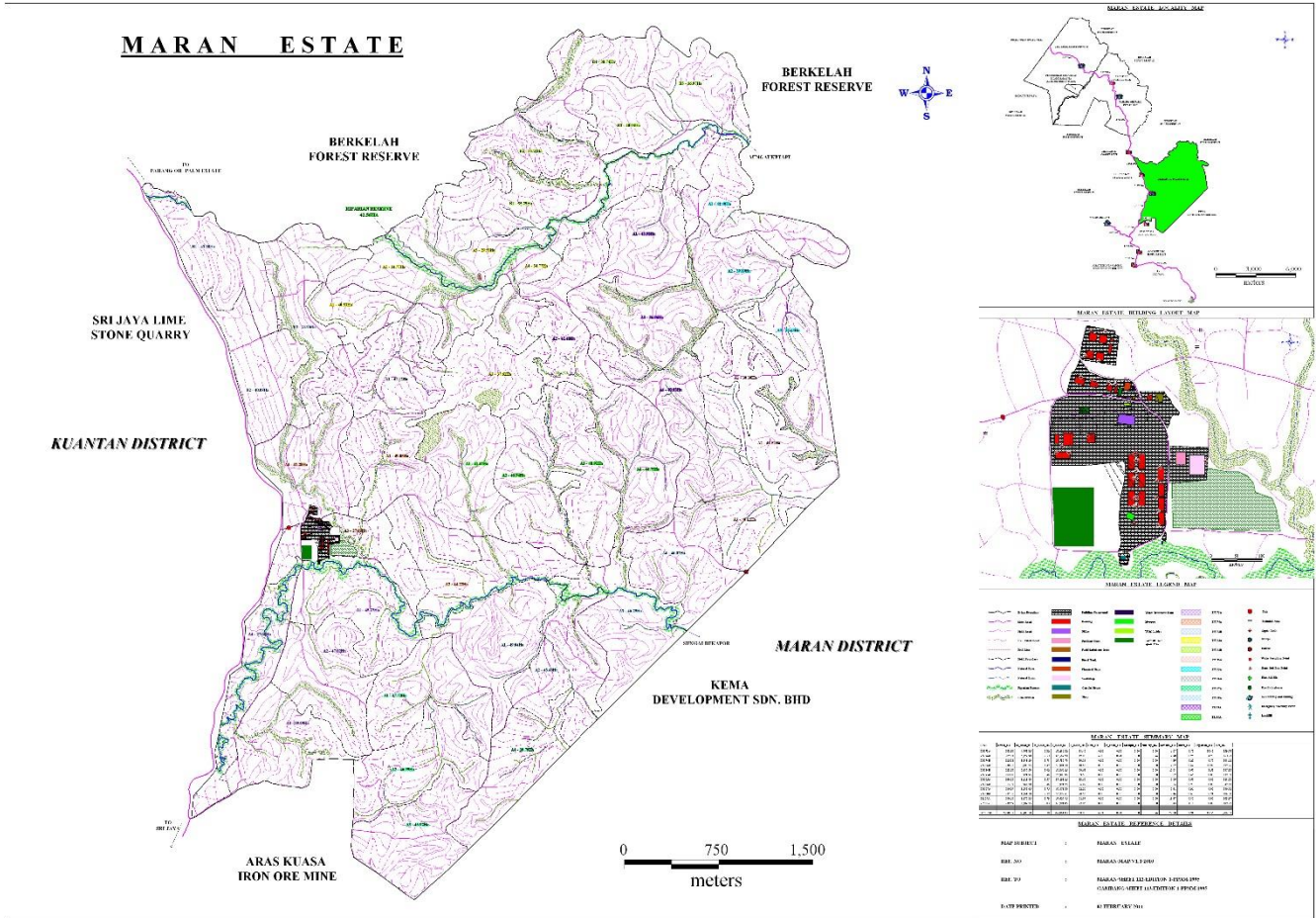
Appendix E: Location Map of Certification Unit and Supply bases

Carotino Palm Oil Mill

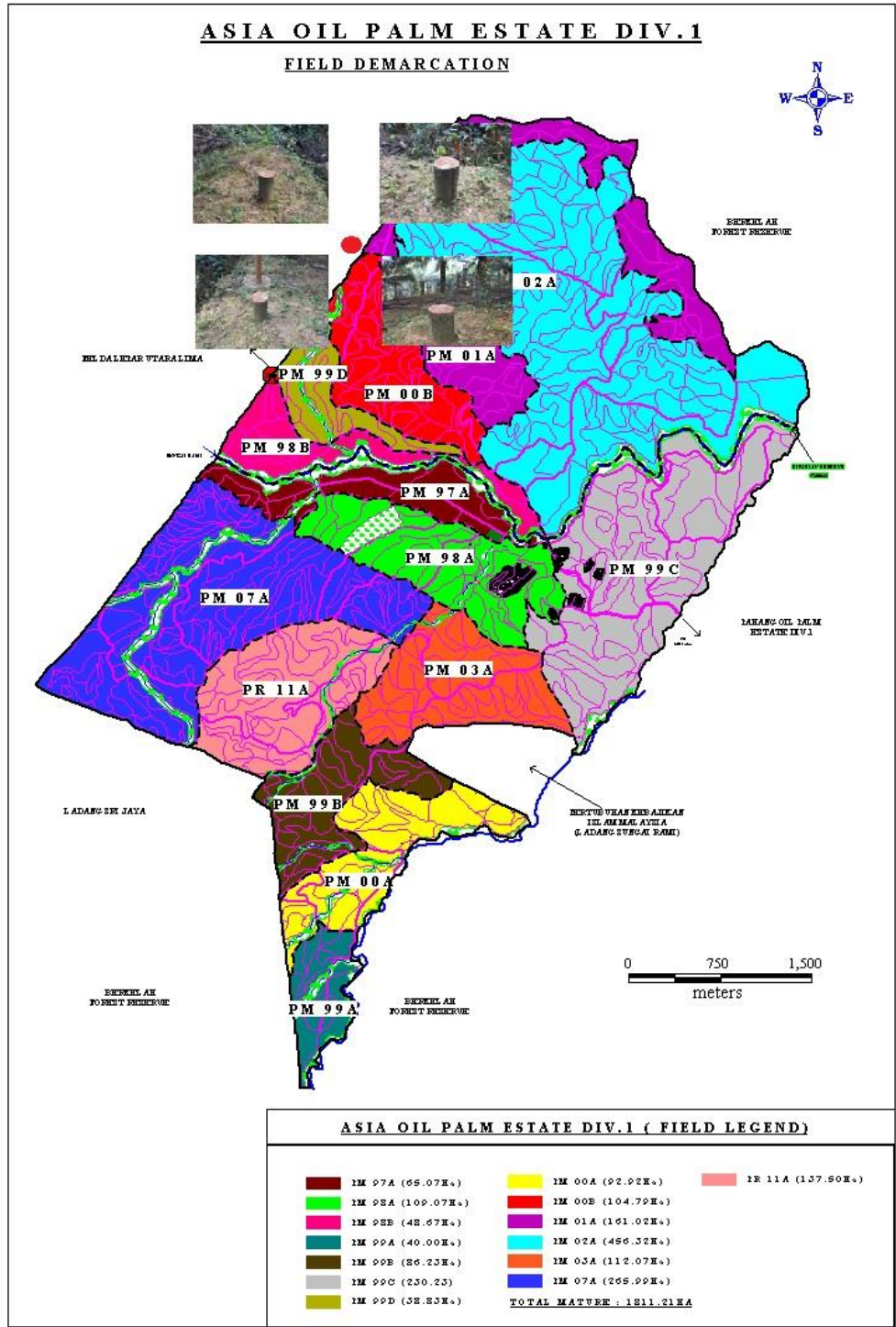


Appendix F: Estate Field Maps

Maran Estate



Asia Oil Palm Estate



Appendix G: List of Smallholder Sampled

Not applicable as no smallholders included in the certification.

Appendix H: 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