

**RSPO PRINCIPLE AND CRITERIA –  
3<sup>rd</sup> Annual Surveillance Assessment (ASA1\_3)  
Public Summary Report**

|                                                                                                                                                                                                                                         |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Carotino / JC Chang Group</b>                                                                                                                                                                                                        |
| <b>Client company Address:</b><br>Unit 30-01, Level 30, Menara Landmark<br>No. 12, Jalan Ngee Heng 80000 Johor Bahru<br>Johor, Malaysia                                                                                                 |
| <b>Certification Unit:</b><br><br><b>Carotino Palm Oil Mill (Carotino Production Unit) and supply base</b><br><br><b>Location of Certification Unit:</b><br><br>PT 116, Lot No. 3840<br>Mukim Ulu Lepar 26500 Kuantan, Pahang, Malaysia |

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## Section 1: Scope of the Certification Assessment

| 1. Company Details                          |                                                                                                                  |                                 |                                                          |
|---------------------------------------------|------------------------------------------------------------------------------------------------------------------|---------------------------------|----------------------------------------------------------|
| <b>RSPO Membership Number</b>               | 2-0029-06-000-00                                                                                                 | <b>Membership Approval Date</b> | 05/03/2010                                               |
| <b>Parent Company Name</b>                  | Carotino/JC Chang Group                                                                                          |                                 |                                                          |
| <b>Address</b>                              | Head office : Unit 30-01, level 30, Menara Landmark, No. 12, Jalan Ngee Heng 80000 Johor, Bahru, Johor, Malaysia |                                 |                                                          |
| <b>Subsidiary (Certification Unit Name)</b> | Carotino Palm Oil Mill (Carotino Production Unit)                                                                |                                 |                                                          |
| <b>Address</b>                              | PT 116, Lot No. 3840, Mukim Ulu Lepar 26500 Kuantan, Pahang, Malaysia                                            |                                 |                                                          |
| <b>Contact Name</b>                         | Mr Seow Chee Chiang (Estate Department Manager: Admin/Sustainability)                                            |                                 |                                                          |
| <b>Website</b>                              | <a href="http://www.carotino.com">www.carotino.com</a>                                                           | <b>E-mail</b>                   | <a href="mailto:seowcc@jcc.com.my">seowcc@jcc.com.my</a> |
| <b>Telephone</b>                            | 607 – 2231 633 (Head Office)<br>6089 – 567012 (Mill)                                                             | <b>Facsimile</b>                | 607 224 1546 (Head Office)<br>6089 – 563091 (Mill)       |

| 2. Certification Information  |                                                                                                                                                                                    |                                    |            |
|-------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|------------|
| <b>Certificate Number</b>     | RSPO 649410                                                                                                                                                                        | <b>Date of First Certification</b> | 27/04/2010 |
|                               |                                                                                                                                                                                    | <b>Certificate Start Date</b>      | 27/04/2015 |
|                               |                                                                                                                                                                                    | <b>Certificate Expiry Date</b>     | 26/04/2020 |
| <b>Scope of Certification</b> | Palm Oil and Palm Kernel Production from Carotino Palm Oil Mill and Supply Base (Asia Oil Palm Estate 1, Hwa Li Estate 1, Hwa Li Estate 2, Maran Estate, Pahang Oil Palm Estate 1) |                                    |            |
| <b>Applicable Standards</b>   | RSPO P&C 2013 (MYNI-2014) and RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module D)                                                                                  |                                    |            |

| 3. Other Certifications    |                    |                              |                    |
|----------------------------|--------------------|------------------------------|--------------------|
| <b>Certificate Number</b>  | <b>Standard(s)</b> | <b>Certificate Issued by</b> | <b>Expiry Date</b> |
| 50450685                   | MSPO               | DQS                          | 24/3/2021          |
| EU-ISCC-CER-DE100-13762016 | ISCC               | SGS                          | 28/9/2017          |

| 4. Location(s) of Mill & Supply Bases |                                                    |                        |                  |
|---------------------------------------|----------------------------------------------------|------------------------|------------------|
| <b>Name<br/>(Mill / Supply Base)</b>  | <b>Location [Map Reference #]</b>                  | <b>GPS Coordinates</b> |                  |
|                                       |                                                    | <b>Latitude</b>        | <b>Longitude</b> |
| Carotino Palm Oil Mill<br>(45 mt/hr)  | PT 116, Lot 3480, Mukim Ulu Lepar, Kuantan, Pahang | 3° 48' 59.85" N        | 102° 49' 5.56" E |

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|                          |                                                                                             |                 |                   |
|--------------------------|---------------------------------------------------------------------------------------------|-----------------|-------------------|
| Asia Oil Palm Estate 1   | Lot 221, 222, 270, 271, 927, Mukim Ulu Lepar, Kuantan Pahang                                | 3° 49' 40.31" N | 102° 47' 49.99" E |
| Hwa Li Estate 1          | Lot 51-56, 317-318, 415-416, 513, 523, 524, Blok 16, Mukim Keratong, Rompin, Pahang         | 2° 44' 40.73" N | 103° 1' 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. 5, HS(D) 64, 3820/2843, 528, 3848, 3850, Mukim Ulu Lepar, Sri Jaya, Kuantan, Pahang | 3° 48' 35.40" N | 102° 49' 13.86" 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   | 1,948.71                               | 74.99         | 117.12                      | 2,140.82        | 91.03        |
| Hwa Li Estate 1          | 1,929.74                               | 45.25         | 186.86                      | 2,161.85        | 89.26        |
| Hwa Li Estate 2          | 1,511.45                               | 13.27         | 134.49                      | 1,659.21        | 91.09        |
| Maran Estate             | 1,784.31                               | 128.30        | 228.21                      | 2,140.82        | 83.35        |
| Pahang Oil Palm Estate 1 | 1,835.21                               | 99.98         | 205.56                      | 2,140.75        | 85.73        |
| <b>Total</b>             | <b>9,009.42</b>                        | <b>361.79</b> | <b>872.24</b>               | <b>10,243.5</b> | <b>87.95</b> |

### 6. Plantings & Cycle

| Estate                   | Age (Years)   |                 |                 |               |               | Mature          | Immature      |
|--------------------------|---------------|-----------------|-----------------|---------------|---------------|-----------------|---------------|
|                          | 0 - 3         | 4 - 10          | 11 - 20         | 21 - 25       | 26 - 30       |                 |               |
| Asia Oil Palm Estate 1   | 137.5         | 265.99          | 1,545.22        | 0             | 0             | 1,811.21        | 137.50        |
| Hwa Li Estate 1          | 131.38        | 304.51          | 1,493.85        | 0             | 0             | 1,798.36        | 131.38        |
| Hwa Li Estate 2          | 482.51        | 0               | 0               | 386.35        | 642.59        | 1,028.94        | 482.51        |
| Maran Estate             | 187.15        | 609.05          | 876.09          | 112.02        | 0             | 1,597.16        | 187.15        |
| Pahang Oil Palm Estate 1 | 0             | 950.74          | 884.47          | 0             | 0             | 1,835.21        | 0             |
| <b>Total (ha)</b>        | <b>938.54</b> | <b>2,130.29</b> | <b>4,799.63</b> | <b>498.37</b> | <b>642.59</b> | <b>8,070.88</b> | <b>938.54</b> |

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| <b>7. Certified Tonnage of FFB (Own Certified Scope)</b> |                           |                        |                          |
|----------------------------------------------------------|---------------------------|------------------------|--------------------------|
| Estate                                                   | Tonnage / year            |                        |                          |
|                                                          | Estimated (Feb 17-Jan 18) | Actual (Feb 17-Jan 18) | Forecast (Feb 18-Jan 19) |
| Asia Oil Palm Estate 1                                   | 45,785.22                 | *37,944.31             | 47,729.30                |
| Hwa Li Estate 1                                          | 34,367.80                 | **12,176.23            | 45,846.81                |
| Hwa Li Estate 2                                          | 21,096.91                 | 19,840.74              | 14,546.55                |
| Maran Estate                                             | 25,932.82                 | 27,018.03              | 26,077.64                |
| Pahang Oil Palm Estate 1                                 | 42,028.58                 | 42,715.02              | 42,762.09                |
| <b>Total</b>                                             | <b>169,211.33</b>         | <b>139,694.33</b>      | <b>176,962.39</b>        |

Note: \*The actual production of Asia Oil Palm Estate 1 is low due to shortage of harvesters

\*\*Only shows records of FFB sent to Carotino Palm Oil Mill. Remaining crops are diverted to other nearby uncertified mills due to estate operations issues for the reporting period.

| <b>8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *</b> |                             |                          |                            |
|-----------------------------------------------------------------------------------|-----------------------------|--------------------------|----------------------------|
| Estate                                                                            | Tonnage / year              |                          |                            |
|                                                                                   | Estimated (Feb 17 – Jan 18) | Actual (Feb 17 – Jan 18) | Forecast (Feb 18 – Jan 19) |
|                                                                                   | N/A                         | N/A                      | N/A                        |
| <b>Total</b>                                                                      |                             |                          |                            |

| <b>9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable</b> |                             |                          |                            |
|-----------------------------------------------------------------------------------------------------|-----------------------------|--------------------------|----------------------------|
| Independent FFB Supplier                                                                            | Tonnage / year              |                          |                            |
|                                                                                                     | Estimated (Feb 17 – Jan 18) | Actual (Feb 17 – Jan 18) | Forecast (Feb 18 – Jan 19) |
|                                                                                                     | N/A                         | N/A                      | N/A                        |
| <b>Total</b>                                                                                        |                             |                          |                            |

| <b>10. Certified Tonnage</b> |                             |                          |                            |
|------------------------------|-----------------------------|--------------------------|----------------------------|
| Mill Capacity:<br>45 MT/hr   | Estimated (Feb 17 – Jan 18) | Actual (Feb 17 – Jan 18) | Forecast (Feb 18 – Jan 19) |
|                              | FFB                         | FFB                      | FFB                        |
|                              | 169,211.33                  | 139,694.33               | 176,962.39                 |
| SCC Model: IP                | CPO (OER: %)                | CPO (OER: %)             | CPO (OER: %)               |
|                              | 34,688.32 (20.45%)          | 27,132.15 (19.42%)       | 36,325.23 (20.53%)         |
|                              | PK (KER: %)                 | PK (KER: %)              | PK (KER: %)                |
|                              | *9,048.78 (5.35)            | 6,900.65 (4.94%)         | 9,270.62 (5.24%)           |

\*Including volume extension of 199 mt due to cancellation of shipping announcement due to expiry of license

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| <b>11. Actual Sold Volume (CPO)</b> (Feb 2017 – Jan 2018) |                |                         |     |              |           |
|-----------------------------------------------------------|----------------|-------------------------|-----|--------------|-----------|
|                                                           | RSPO Certified | Other Schemes Certified |     | Conventional | Total     |
|                                                           |                | ISCC                    | RSB |              |           |
| <b>CPO (MT)</b>                                           | 14,833.62      | 12,111.19               | -   | -            | 26,944.81 |

| <b>12. Actual Sold Volume (PK)</b> (Feb 2017 – Jan 2018) |                |                         |     |              |          |
|----------------------------------------------------------|----------------|-------------------------|-----|--------------|----------|
|                                                          | RSPO Certified | Other Schemes Certified |     | Conventional | Total    |
|                                                          |                | ISCC                    | RSB |              |          |
| <b>PK (MT)</b>                                           | 6,049.37       | -                       | -   | 836.45       | 6,885.82 |

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

## Section 2: Assessment Process

### Certification Body:

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

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### 2.1 Assessment Methodology, Programme, Site Visits

The on-site surveillance was conducted from 6-8/02/2018. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The audit programme are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criteria 2013 (MYNI-2014) and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

- The estates sample were determined based on formula  $N = 0.8\sqrt{y}$  where  $y$  is the number of estates (*Note: This is applicable until 30<sup>th</sup> June 2018*).
- 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 (*Note: This is applicable starting from 1<sup>st</sup> July 2018*).
- 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 H.



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Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.5.

All the previous nonconformities are remains closed. The assessment findings for the surveillance 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**

| <b>Assessment Program</b>            |                                     |                           |                           |                           |                           |
|--------------------------------------|-------------------------------------|---------------------------|---------------------------|---------------------------|---------------------------|
| <b>Name<br/>(Mill / Supply Base)</b> | <b>Year 1<br/>(Recertification)</b> | <b>Year 2<br/>(ASA 1)</b> | <b>Year 3<br/>(ASA 2)</b> | <b>Year 4<br/>(ASA 3)</b> | <b>Year 5<br/>(ASA 4)</b> |
| 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:** February 5, 2019 – February 7, 2019

**Total No. of Mandays:** 9.0 mandays

**2.2 BSI Assessment Team:**

| Team Member Name                  | Role         | Qualifications<br><i>(Short description of the team members)</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-----------------------------------|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Valence Shem (VS)                 | Lead auditor | He holds Bachelor Degree in Industrial Technology, graduated from University of Science Malaysia in 1998 and has 9 years working experience in oil palm plantation industry. He has been in the management system auditing line since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. During this assessment, he assessed on the aspects of legal, environmental & biodiversity, agriculture best practices and the supply chain element. Able to communicate in Bahasa Malaysia and English.                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Mohamed Zainal Hidhir Abidin (MH) | Team member  | He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health, environmental and workers and stakeholders consultation.                                                                                                                                                                                                                                                                                                                                                                                                  |
| Elzy Ovktafia (EO)                | Team member  | She graduated from Universiti Putra Malaysia in Diploma of Agriculture, holding the designatory of LISP from the Incorporated Society of Planters and currently in the midst of completing the AISP level (professional certificate and recognition from the Incorporated Society of Planters). She involve in audits and technical reviews works mainly for Sustainability Programme includes RSPO, MSPO and 2nd Party Audit for Social Compliance Programme (URSA, ETI) for 2 years in more than 11 countries. She is a qualified Lead Auditor/Auditor for RSPO P&C, RSPO NEXT, RSPO SCC, ISO 9001:2015 and Social Compliance Audit by Verite. Prior to this, she was the Agronomist in R&D Department for almost 5 years in Oil Palm Plantation where her task involved in all Oil Palm Plantation Operations such as conducting experimental trials on Research & Development with technical paper publications, Crop Forecast, Leaf & Soil Sampling Collection, Fertilizer Recommendation, Pest and Diseases Training, Quality Control as well as special project namely Yield Intensification Project and Food for Palm Project for estates. During this assessment, she assessed on the aspects of legal, social and stakeholder engagement. Able to communicate in Bahasa Malaysia and English. |

**Accompanying Persons:**

| No. | Name | Role |
|-----|------|------|
|     | N/A  |      |

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**2.3 Assessment Plan**

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

| Date                                                     | Time        | Subjects                                                                                                                                                                                                                                                                                                                                                                   | VS | MH | EO |
|----------------------------------------------------------|-------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|----|----|
| Tuesday<br>6/2/2018<br><br><b>Carotino Palm Oil Mill</b> | 08:30-09:00 | Opening Meeting: <ul style="list-style-type: none"> <li>Opening Presentation by Audit team leader.</li> <li>Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation)</li> <li>Verification on previous audit findings</li> </ul>                                                                                                    | √  | √  | √  |
|                                                          | 09:00-13:00 | <b>Carotino Palm Oil Mill</b><br>Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.                                                               | √  | √  | √  |
|                                                          | 13:00-14:00 | Lunch break                                                                                                                                                                                                                                                                                                                                                                | √  | √  | √  |
|                                                          | 14:00-16:30 | <b>Carotino Palm Oil Mill</b><br>Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities. | √  | √  | √  |
|                                                          | 16:30-17:00 | Interim Closing Briefing                                                                                                                                                                                                                                                                                                                                                   | √  | √  | √  |
| Wednesday<br>7/2/2018<br><br><b>Asia Oil Palm Estate</b> | 08:30-13:00 | <b>Asia Oil Palm Estate</b><br>Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc                                             | √  | √  | √  |
|                                                          | 10:00-13:00 | <b>Stakeholder consultations:</b><br>Client to invite the relevant stakeholders for <b>both mill and estates</b> 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.                                   | -  | -  | √  |
|                                                          | 13:00-14:00 | Lunch break                                                                                                                                                                                                                                                                                                                                                                | √  | √  | √  |
|                                                          | 14:00-16:30 | <b>Asia Oil Palm Estate</b><br>Document review P1 – P8:<br>(General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).                         | √  | √  | √  |
|                                                          | 16:30-17:00 | Interim Closing Briefing                                                                                                                                                                                                                                                                                                                                                   | √  | √  | √  |

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|                                                                   |             |                                                                                                                                                                                                                                                                                                                                                                                                 |   |   |   |
|-------------------------------------------------------------------|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|---|
| <p>Thursday<br/>8/2/2018</p> <p><b>Pahang Oil Palm Estate</b></p> | 08:30-13:00 | <p><b>Pahang Oil Palm Estate</b><br/>           Field visit, boundary inspection, field operations, staff &amp; workers interview, buffer zone, HCV area, IPM implementation, OSH&amp;ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc</p>                                     | √ | √ | √ |
|                                                                   | 13:00-14:00 | Lunch                                                                                                                                                                                                                                                                                                                                                                                           | √ | √ | √ |
|                                                                   | 14:00-15:30 | <p><b>Pahang Oil Palm Estate</b><br/>           Document review P1 – P8:<br/>           (General Documentation e.g. Legal, Manual and Procedure, production &amp; monitoring records, IPM &amp; HCV records, SEIA documents &amp; records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).</p> | √ | √ | √ |
|                                                                   | 15:30-16:30 | Verify any outstanding issues & preparation for closing meeting                                                                                                                                                                                                                                                                                                                                 | √ | √ | √ |
|                                                                   | 16:30-17:30 | Closing meeting                                                                                                                                                                                                                                                                                                                                                                                 | √ | √ | √ |

### Section 3: Assessment Findings

#### 3.1 Details of audit results are provided in the following Appendix:

- Carotino/JC Chang Group Time Bound Plan
- RSPO P&C MY-NIWG 2014
- RSPO Supply Chain Certification June 2017

#### 3.2 Progress against Time Bound Plan (Uncertified management)

| Time Bound Plan                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                  |            |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| Requirement                                                                                                                                                                                                                          | Remarks                                                                                                                                                                                                                                                                                          | Compliance |
| <b>Summary of the Time Bound Plan</b>                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                  |            |
| Does the plan include all subsidiaries, estates and mills?                                                                                                                                                                           | Yes                                                                                                                                                                                                                                                                                              | Yes        |
| Is the time bound plan challenging?<br><ul style="list-style-type: none"> <li>• Age of plantations.</li> <li>• Location.</li> <li>• POM development</li> <li>• Infrastructure.</li> <li>• Compliance with applicable law.</li> </ul> | The time bound plan is challenging enough. According to the 2017 ACOP report, JC Chang is committed to achieve 100% RSPO Certification in all production processing facilities by 2020.                                                                                                          | Yes        |
| Have there been any changes since the last audit? Are they justified?                                                                                                                                                                | As of this year, no changes as per submitted to ACOP. However, JC Chang will be undergoing certification assessment for the remaining mill Takon Production Unit. The delay of conducting the assessment of Takon Production was to wait for the approval of Concept note and Compensation Plan. | Yes        |
| If there have been changes, what circumstances have occurred?                                                                                                                                                                        | The only changes is the year to only handle internal certified crop will be delayed due to pending of approval of HCV disclosure by RSPO.                                                                                                                                                        | Yes        |
| Have there been any stakeholder comments?                                                                                                                                                                                            | No stakeholder comment received.                                                                                                                                                                                                                                                                 | Yes        |
| Have there been any newly acquired subsidiaries?                                                                                                                                                                                     | No                                                                                                                                                                                                                                                                                               | N/A        |
| If yes, have the newly acquisitions certified within a three-year timeframe?                                                                                                                                                         | No                                                                                                                                                                                                                                                                                               | N/A        |
| Have there been any isolated lapses in implementation of the plan?                                                                                                                                                                   | The lapse of the original implementation plan has deviated due to awaiting for RaCP concept note approval for Takon Production Unit. The lapses has been identified in the ACOP 2017 report.                                                                                                     | Yes        |
| <b>Un-Certified Units or Holdings</b>                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                  |            |
| Did the company conduct an internal audit? If so, has a positive                                                                                                                                                                     | The remaining uncertified palm oil mill and its supply base under JC Chang Group is Takon Production Unit.                                                                                                                                                                                       | Yes        |

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| <p>assurance statement been produced?</p>                                                                                                                                                                                                                                                                             | <p>Internal audits are done by Group’s internal audit team. Reports consist of root-cause analysis and action plan to mitigate the non-compliances. The last internal audit conducted for Takon Production Unit was in January 2018. The Management meeting was conducted on 13/02/2018 to address the positive assurance of Takon Production unit.</p> <p>Continuous internal audit has also been further conducted in May and June 2018.</p> |            |
| <p>No replacement after dates defined in P&amp;C Criterion 7.3:</p> <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area identified as containing High Conservation Values (HCVs).</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3.</li> </ul> | <p>Takon Production Unit has undergone RaCP. As per the RSPO website <a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a>, the concept note has been submitted and approved. The compensation plan has been submitted for approval.</p>                                                                                     | <p>Yes</p> |
| <p>Any new plantings since January 1<sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.</p>                                                                                                                                                                                                         | <p>The only new planting that occur after Jan 1<sup>st</sup> 2010 is Takon Production Unit which is under RaCP.</p>                                                                                                                                                                                                                                                                                                                            | <p>Yes</p> |
| <p>Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.</p>                                                                                                                      | <p>Land issues is resolved through RaCP.</p>                                                                                                                                                                                                                                                                                                                                                                                                   | <p>Yes</p> |
| <p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.</p>                                                                                                                                                                                                | <p>There was no labor issue reported. Assessment team conducted verification through media reports.</p>                                                                                                                                                                                                                                                                                                                                        | <p>Yes</p> |
| <p>Any Legal non- compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.</p>                                                                                                                                                                            | <p>There was no labor issue reported. Assessment team conducted verification through media reports.</p>                                                                                                                                                                                                                                                                                                                                        | <p>Yes</p> |

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

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

**3.4 Details of findings**

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

During the Annual Surveillance Assessment there were six (6) Major & zero (0) Minor nonconformities raised. The Carotino Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity were then reviewed by the BSI audit team and accepted them for closure.

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

| Summary of Total Number of Nonconformity |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                            |                       |
|------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|-----------------------|
| Nonconformity                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                            |                       |
| <b>NCR Ref #</b>                         | 1587738-201802-M1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>Clause &amp; Category (Major/Minor)</b> | Indicator 2.1.1 Major |
| <b>Date Issued</b>                       | 08/02/2018                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Due Date</b>                            | 07/04/2018            |
| <b>Closed (Yes/No)</b>                   | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Date of nonconformity closure</b>       | 27/3/2018             |
| <b>Statement of Nonconformity</b>        | Evidence of compliance with relevant legal requirements was not effectively demonstrated [ref.:Act 265 EMPLOYMENT ACT 1955 and DOE License/Compliance Schedule: JP/KKS/2017/2018/003216 (validity period 1/7/2017 - 30/6/2018)]                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                            |                       |
| <b>Requirement Reference</b>             | Evidence of compliance with relevant legal requirements shall be available.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                            |                       |
| <b>Objective Evidence</b>                | 1) There is one female employee ID: G0003 (CPOM) has worked for night shift (after 10 pm) as per pay slip for Jun'17, Nov'17 and Jan'18 and this is not comply with Act 265 EMPLOYMENT ACT 1955, PART VIII, EMPLOYMENT OF WOMEN, Prohibition of night work:<br>34. (1) Except in accordance with regulations made under this Act or any exemption granted under the proviso to this subsection no employer shall require any female employee to work in any industrial or agricultural undertaking between the hours of ten o'clock in the evening and five o'clock in the morning nor commence work for the day without having had a period of eleven consecutive hours free from such work: |                                            |                       |

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|                                   | <p>Provided that the Director General may, on application made to him in any particular case, exempt in writing any female employee or class of female employees from any restriction in this subsection, subject to any conditions he may impose.</p> <p>2) No compliance audit carried out by 3rd party to check compliance against the Compliance Schedule as to date.</p> <p>3) Noise boundary monitoring was not carried out as to date. The latest additional noise monitoring carried out on 17/8/17 did not cover the noise boundary monitoring requirement as per compliance schedule.</p>                                                                                                                                                                                                                                                                                                               |
| <p><b>Corrections</b></p>         | <p>1) Employment Of Women</p> <ul style="list-style-type: none"> <li>• The female employee has been change to day shift until Mill obtains approval from Labour Department.</li> <li>• The Mill has sent the request form " Borang D" to Labour Department to get the approval for female employee to work at night shift.</li> </ul> <p>2) Compliance audit</p> <ul style="list-style-type: none"> <li>• In the midst of obtaining the quotation from registered environmental auditor.</li> <li>• Inform DOE and carried out the compliance audit.</li> <li>• Take action for any non-compliance result from compliance audit.</li> </ul> <p>3) Noise boundary monitoring</p> <ul style="list-style-type: none"> <li>• Getting quotation from competent person or company to conduct noise boundary monitoring.</li> <li>• Take action for any recommendation from noise boundary monitoring report.</li> </ul> |
| <p><b>Root Cause Analysis</b></p> | <p>1) The approval letter from Jabatan Tenaga Kerja was missing after management changes and the current management did not obtained a replacement copy as the female worker has been in the position for over 15 years.</p> <p>2) The compliance audit is not planned as the current compliance period to conduct the audit is still valid (1st July 2017 – 30th June 2018). However, due to miscommunication between Mill and DOE where the previous government official agrees to the usage of RSPO Certification Body report but current government official indicate otherwise.</p> <p>3) The noise boundary monitoring is a new requirement is a new requirement in Jadual Pematuhan DOE and the Mill has overlooked on the requirement. However, the compliance period is still valid (1st July 2017 – 30th June 2018) and can still perform the monitoring (Confirmed with Mr. Yahya, DOE officer).</p>   |
| <p><b>Corrective Action</b></p>   | <p>1) Employment Of Women</p> <ul style="list-style-type: none"> <li>• No female employee allowed to working at the night shift until mill get the approval from Labour Department.</li> <li>• The manager will ensure that the documented approval is received before allowing any female employee to work at night.</li> </ul> <p>2) Compliance audit</p> <ul style="list-style-type: none"> <li>• Include the compliance audit in yearly environmental programme planning.</li> <li>• Request yearly budget from HQ to conduct compliance audit.</li> <li>• The management will ensure that this requirement is complied. The management will consult with the relevant authority whenever possible especially when there are changes of personnel. This will ensure that the information obtained will be up to date.</li> </ul> <p>3) Noise boundary monitoring</p>                                          |



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|                              | <ul style="list-style-type: none"> <li>• Include the Noise boundary monitoring in yearly environmental programme planning.</li> <li>• Request yearly budget from HQ to conduct noise boundary monitoring</li> </ul> <p>The manager will ensure that all the requirements from the noise boundary monitoring report are thoroughly complied.</p>                                                                                      |
| <b>Assessment Conclusion</b> | The submitted evidence i.e. form " <i>Borang D'</i> " to Labour Department to get the approval for female employee to work at night shift, approved quotation to conduct environmental compliances audit and approved quotation for boundary noise exposure monitoring was found to be sufficient to close the NCR. The NCR was effectively closed on 27/3/2018. Continuous implementation shall be verified in the next assessment. |

| Summary of Total Number of Nonconformity |                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                            |                       |
|------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|-----------------------|
| Nonconformity                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                            |                       |
| <b>NCR Ref #</b>                         | 1587738-201802-M2                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <b>Clause &amp; Category (Major/Minor)</b> | Indicator 4.4.2 Major |
| <b>Date Issued</b>                       | 08/02/2018                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Due Date</b>                            | 07/04/2018            |
| <b>Closed (Yes/No)</b>                   | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Date of nonconformity closure</b>       | 27/3/2018             |
| <b>Statement of Nonconformity</b>        | Maintenance and restoration of riparian buffer zones was not effectively implemented.                                                                                                                                                                                                                                                                                                                                                                                     |                                            |                       |
| <b>Requirement Reference</b>             | Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated.                                                                                                                                                                                                                                                                |                                            |                       |
| <b>Objective Evidence</b>                | Traces of herbicide spraying was found at riparian buffer zone at Field No. 97U of Pahang Oil Palm Estate.                                                                                                                                                                                                                                                                                                                                                                |                                            |                       |
| <b>Corrections</b>                       | NA. There is not much to be done on the sprayed area.                                                                                                                                                                                                                                                                                                                                                                                                                     |                                            |                       |
| <b>Root Cause Analysis</b>               | The criteria of 'checking of riparian zone' were not included in the existing monitoring form.                                                                                                                                                                                                                                                                                                                                                                            |                                            |                       |
| <b>Corrective Action</b>                 | 1) The monitoring form will be implemented beginning of 1st March 2018. The requirement "to identify the presence of riparian buffer zone demarcation prior to spraying activity" has been added.<br>2) Conductors in-charge will be briefed on the requirement to ensure understanding and awareness is conveyed.<br>3) The management will monitor the effect of spraying activities periodically to ensure that the riparian buffer zone in the estate is not damaged. |                                            |                       |
| <b>Assessment Conclusion</b>             | The submitted evidence i.e. SOP Monitoring for Sprayers and briefing record to the conductors in-charge was reviewed. Additional onsite evidence on demarcation was verified and found it to be sufficient to close the NCR. The NCR is deemed effectively closed on 27/3/2018. Continuous implementation shall be verified in the next assessment.                                                                                                                       |                                            |                       |

| Summary of Total Number of Nonconformity |                   |                                            |                       |
|------------------------------------------|-------------------|--------------------------------------------|-----------------------|
| Nonconformity                            |                   |                                            |                       |
| <b>NCR Ref #</b>                         | 1587738-201802-M3 | <b>Clause &amp; Category (Major/Minor)</b> | Indicator 4.7.2 Major |

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|-----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------|
| <b>Date Issued</b>                | 08/02/2018                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>Due Date</b>                      | 07/04/2018 |
| <b>Closed (Yes/No)</b>            | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Date of nonconformity closure</b> | 27/3/2018  |
| <b>Statement of Nonconformity</b> | Procedures and actions was not effectively documented and implemented to address the identified ill health and occupational disease issues.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                      |            |
| <b>Requirement Reference</b>      | All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                      |            |
| <b>Objective Evidence</b>         | <p>i) Group health and safety manual, edition 1 dated 13/2/07 only explained on the process flow for incident reporting. Process of medical removal protection as not detailed out in the procedure and only explained on reporting of occupational poisoning and disease.</p> <p>ii) HIRARC register for boiler operation did not mentioned specific control measures and PPE requirement for the operators working at high noise area. i.e. Boiler area – hazard of high noise exposure, risk: hearing loss [noise monitoring – control measures, PPE: ear plug]</p> <p>iii) Based on the latest audiometric report dated 10/8/17, there were 1 case of STS and 2 cases of hearing impairment recorded. No retest carried out within 3 month from the date of testing and no further check carried out for the hearing impaired workers.</p>                                                         |                                      |            |
| <b>Corrections</b>                | <p>1) Health and Safety Procedure.</p> <ul style="list-style-type: none"> <li>• Mill to conduct an emergency OSH meeting to review back the procedure. (Appendix 8, Appendix 9)</li> <li>• All incident reporting will follow the new procedure.</li> <li>• The procedure for medical removal protection; Audiometric testing programme and medical surveillance programme was reviewed.</li> </ul> <p>2) HIRARC</p> <ul style="list-style-type: none"> <li>• Mill to conduct an emergency OSH meeting to review back the HIRARC. (Appendix 10)</li> <li>• Appoint the person in charge of the operation to monitor the changes in the HIRARC.</li> <li>• The HIRARC was reviewed on 21/02/2018.</li> </ul> <p>3) STS</p> <ul style="list-style-type: none"> <li>• Mill to get the quotation and scheduled for a retest. (Appendix 11)</li> <li>• Approved quotation of audiometric testing</li> </ul> |                                      |            |
| <b>Root Cause Analysis</b>        | <p>1) The Management lacks the understanding to include such process in the procedure as the occupational poisoning and disease rarely happens. Thus, the element is overlooked through time.</p> <p>2) The Management registration and development of HIRARC is based on previous experience and committee meeting. The management lack the insight to include in the extra assessments in the existing HIRARC.</p> <p>3) Due to the mistake by agent engaged who had lost the initial report which caused the late delivery to Mill. The second copy of report has only been received in December.</p>                                                                                                                                                                                                                                                                                               |                                      |            |
| <b>Corrective Action</b>          | 1) The Mill will advise HQ to update the procedure when necessary in the future if there are any new requirements arise. The OSH committee will ensure that the current procedures are complied. The OSH committee will be briefed again on the details and procedures to increase their understanding and knowledge.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                      |            |

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|                                     | <p>2) The review of HIRARC will be carried out when necessary to ensure that all relevant operations are properly risks assessed. The OSH committee will carry out the review at planned schedule. Whenever there are new activities, the committee will review the HIRARC to ensure that all risks are properly assessed. This will reduce the probabilities of the committee missing out any risks from new activities.</p> <p>3) STS</p> <p>i) If the latest retest result remains the same, mill will referred to occupational doctor.</p> <p>ii) If the negative result is due to workplace, mill will report to DOSH.</p> <p>iii) Mill will review all report received and take the immediate action if needed.</p> <p>iv) The Mill will ensure that the reporting process for compliance is not affected due to 3<sup>rd</sup> party mistake again. The mill will contact any agent used at closer interval after assessments until the report or document has been received.</p> |
| <p><b>Assessment Conclusion</b></p> | <p>The procedure was reviewed on 12/02/2018. Subsequent to the review, OSH committee meeting was conducted n 06/03/2018. The result of the meeting has concluded the action plans to prevent the issues of lack of understanding and action to monitors third reports such as CHRA, noise monitoring, chemical exposure monitoring report, audiometric report, medical surveillance, other issues related to OSH monitoring and new legal requirements related to OSH. The evidence submitted was found to be sufficient to close the NCR. The NCR was effectively closed on 27/3/2018. Continuous implementation shall be verified in the next assessment.</p>                                                                                                                                                                                                                                                                                                                          |

| <b>Summary of Total Number of Nonconformity</b> |                                                                                                                                                                                                                                                                                                                                                                          |                                                   |                                          |
|-------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|------------------------------------------|
| <b>Nonconformity</b>                            |                                                                                                                                                                                                                                                                                                                                                                          |                                                   |                                          |
| <p><b>NCR Ref #</b></p>                         | <p>1587738-201802-M4</p>                                                                                                                                                                                                                                                                                                                                                 | <p><b>Clause &amp; Category (Major/Minor)</b></p> | <p>Indicator 5.3.2<br/>Major of SCCS</p> |
| <p><b>Date Issued</b></p>                       | <p>08/02/2018</p>                                                                                                                                                                                                                                                                                                                                                        | <p><b>Due Date</b></p>                            | <p>07/04/2018</p>                        |
| <p><b>Closed (Yes/No)</b></p>                   | <p>Yes</p>                                                                                                                                                                                                                                                                                                                                                               | <p><b>Date of nonconformity closure</b></p>       | <p>27/3/2018</p>                         |
| <p><b>Statement of Nonconformity</b></p>        | <p>The internal audit report unable to provide evidence of conformance to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p>                                                                                                                                                                  |                                                   |                                          |
| <p><b>Requirement Reference</b></p>             | <p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>ii) effectively implements and maintains the standard requirements within its organization</p> |                                                   |                                          |
| <p><b>Objective Evidence</b></p>                | <p>An audit checklist has been established entitled "Internal Control Checklist" (combined RSPO P&amp;C, ISCC, MSPO, RSPO SCC). It was utilised during the exercise of internal audit on 12-14/12/2017. However, there was no clear evidence of checking of compliance with the RSPO SCCS and RSPO Market Communications and Claims Documents.</p>                       |                                                   |                                          |
| <p><b>Corrections</b></p>                       | <p>To conduct an ad-hoc internal audit based on the newly revised checklist.</p>                                                                                                                                                                                                                                                                                         |                                                   |                                          |
| <p><b>Root Cause Analysis</b></p>               | <p>The checklist used for internal assessment did not include the elements from RSPO Supply Chain Certification Standard (SCCS). Only general statement that the RSPO SCCS had been assessed. Due to the fact that the Group's internal audit method is</p>                                                                                                              |                                                   |                                          |

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|                              | mainly on Non-compliance identification, only the non-compliances were documented in the checklist for further report writing process. On the other hand, samples taken that complied will not be elaborately documented.                                                                                                            |
| <b>Corrective Action</b>     | The Internal Control Assessment Checklist will be utilized for future Internal Control Assessment by Internal Control Team at planned interval. Documents pertaining the elements will be sampled to demonstrate compliance to the standard. Non-compliance will be reported as per usual in the Internal Control Assessment Report. |
| <b>Assessment Conclusion</b> | The submitted evidence i.e. ad-hoc internal audit report and the newly revised audit checklist was found to be sufficient to close the NCR. The NCR was effectively closed on 27/3/2018. Continuous implementation shall be verified in the next assessment.                                                                         |

| Summary of Total Number of Nonconformity |                                                                                                                                                                                                                                                                               |                                            |                                |
|------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|--------------------------------|
| Nonconformity                            |                                                                                                                                                                                                                                                                               |                                            |                                |
| <b>NCR Ref #</b>                         | 1587738-201802-M5                                                                                                                                                                                                                                                             | <b>Clause &amp; Category (Major/Minor)</b> | Indicator 5.13.1 Major of SCCS |
| <b>Date Issued</b>                       | 08/02/2018                                                                                                                                                                                                                                                                    | <b>Due Date</b>                            | 07/04/2018                     |
| <b>Closed (Yes/No)</b>                   | Yes                                                                                                                                                                                                                                                                           | <b>Date of nonconformity closure</b>       | 27/3/2018                      |
| <b>Statement of Nonconformity</b>        | Management review on RSPO supply chain implementation has yet to be conducted.                                                                                                                                                                                                |                                            |                                |
| <b>Requirement Reference</b>             | The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.                                                                                                                      |                                            |                                |
| <b>Objective Evidence</b>                | There is no evidence that management review has been conducted which contains the input and output according to the RSPO SCCS standard.                                                                                                                                       |                                            |                                |
| <b>Corrections</b>                       | To conduct an ad-hoc management review according to the newly revised guideline.                                                                                                                                                                                              |                                            |                                |
| <b>Root Cause Analysis</b>               | Implementation of management review was not clearly described in the Group's Guideline.                                                                                                                                                                                       |                                            |                                |
| <b>Corrective Action</b>                 | The Management Review will be implemented as per Group's Guideline to include the elements that are required by the standards.                                                                                                                                                |                                            |                                |
| <b>Assessment Conclusion</b>             | The submitted evidence i.e. ad-hoc management review minutes of meeting and the newly revised Group's Guideline was found to be sufficient to close the NCR. The NCR was effectively closed on 27/3/2018. Continuous implementation shall be verified in the next assessment. |                                            |                                |

| Summary of Total Number of Nonconformity |                                                                                                                                        |                                            |                            |
|------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|----------------------------|
| Nonconformity                            |                                                                                                                                        |                                            |                            |
| <b>NCR Ref #</b>                         | 1587738-201802-M6                                                                                                                      | <b>Clause &amp; Category (Major/Minor)</b> | Indicator SCCS D.5.1 Major |
| <b>Date Issued</b>                       | 08/02/2018                                                                                                                             | <b>Due Date</b>                            | 07/04/2018                 |
| <b>Closed (Yes/No)</b>                   | Yes                                                                                                                                    | <b>Date of nonconformity closure</b>       | 27/3/2018                  |
| <b>Statement of Nonconformity</b>        | The standard requirement on record and balance shall be done on real-time basis was not implemented.                                   |                                            |                            |
| <b>Requirement Reference</b>             | 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. |                                            |                            |

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|                              |                                                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Objective Evidence</b>    | The current record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK was still on three-monthly basis.                                                                                                                                                                                                                                                       |
| <b>Corrections</b>           | Due to Group's accounting system has the function to capture records daily. With the available figures, the Mill will summarize the figures to tabulate records and balance of all RSPO Certified FFB, CPO and PK on daily basis.                                                                                                                                                                     |
| <b>Root Cause Analysis</b>   | The Mill has yet to be update to the latest RSPO SCCS during the date of audit which requires the record to be on real-time basis. The Mill recording is based on quarterly basis (3 months).                                                                                                                                                                                                         |
| <b>Corrective Action</b>     | <ol style="list-style-type: none"> <li>1) The Mill will follow the RSPO Supply Chain Standards, Revised Version on the implementation of recording on real-time basis.</li> <li>2) The daily data will be collected from report and production figures to be tabulated and monitored to ensure no short selling.</li> <li>3) The records will be checked and confirmed by Mill Management.</li> </ol> |
| <b>Assessment Conclusion</b> | The submitted evidence i.e. utilization of recording format of real-time basis and recording format of real-time basis was found to be sufficient to close the NCR. The NCR was effectively closed on 27/3/2018. Continuous implementation shall be verified in the next assessment.                                                                                                                  |

| <b>Opportunity for Improvements</b> |                    |
|-------------------------------------|--------------------|
| <b>OFI #</b>                        | <b>Description</b> |
| <b>OFI 1</b>                        | <b>NIL</b>         |

| <b>Positive Findings</b> |                                                                                                                      |
|--------------------------|----------------------------------------------------------------------------------------------------------------------|
| <b>PF #</b>              | <b>Description</b>                                                                                                   |
| <b>PF 1</b>              | Good cooperation from the management team in assisting the assessment.                                               |
| <b>PF 2</b>              | Good relationship with stakeholders where in general the audit team received positive feedback during consultations. |

**3.4.1 Status of Nonconformities Previously Identified and Observations**

There was no NCR raised in the previous assessment.

| <b>Opportunity for Improvement</b> |                    |
|------------------------------------|--------------------|
| <b>OFI#</b>                        | <b>Description</b> |
| <b>OFI 1</b>                       | <b>NIL</b>         |

**3.4.2 Summary of the Nonconformities and Status**

| <b>CAR Ref.</b>   | <b>CATEGORY (MAJOR/ MINOR)</b> | <b>ISSUED</b> | <b>STATUS &amp; DATE (Closure)</b> |
|-------------------|--------------------------------|---------------|------------------------------------|
| 1300492M1 - 4.7.1 | Major                          | 24/2/2016     | Closed out on 15/03/2016           |
| 1300492N1 - 2.1.4 | Minor                          | 24/2/2016     | Closed out on 08/02/2017           |
| 1300492N2 - 4.1.2 | Minor                          | 24/2/2016     | Closed out on 08/02/2017           |

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|                                 |       |            |                          |
|---------------------------------|-------|------------|--------------------------|
| 1300492N3 - 4.7.5               | Minor | 24/2/2016  | Closed out on 08/02/2017 |
| 1587738-201802-M1 - 2.1.1       | Major | 08/02/2018 | Closed out on 27/3/2018  |
| 1587738-201802-M2 - 4.4.2       | Major | 08/02/2018 | Closed out on 27/3/2018  |
| 1587738-201802-M3 - 4.7.2       | Major | 08/02/2018 | Closed out on 27/3/2018  |
| 1587738-201802-M4 - SCCS 5.3.2  | Major | 08/02/2018 | Closed out on 27/3/2018  |
| 1587738-201802-M5 - SCCS 5.13.1 | Major | 08/02/2018 | Closed out on 27/3/2018  |
| 1587738-201802-M6 - D.5.1       | Major | 08/02/2018 | Closed out on 27/3/2018  |

**3.5. Stakeholders Consultation**

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

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.



Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as below.

| <b>List of Stakeholders Contacted</b>                                                                         |                                                                                                    |
|---------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|
| <b>Internal Stakeholders</b><br>Mill and estates workers<br>Workers’ Representative<br>Women’s Representative | <b>Union/Contractors/Local Communities</b><br>Village representative – Kg. Tompesel<br>Contractors |
| <b>Government Departments</b><br>Gambang Police Department<br>School – SK Ulu Luit                            | <b>NGO</b><br>nil                                                                                  |

| <b>IS #</b> | <b>Description</b>                                                                                                                                                                                                  |
|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1</b>    | <b>Feedbacks:</b><br>Head Master-SK Ulu Luit<br>There was a student whom the worker’s child (Muhd Khairul Faizi, Year 2) from Pahang Oil Palm Estate was not coming to school for more than 20 days without reason. |
|             | <b>Management Responses:</b>                                                                                                                                                                                        |

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|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | <p>Estate will check who is the parent and verified whether the child is already change to the nearest school in Estate. As todate, Estate and Mill has provided the transportation for school children to go to school and back to school every day.</p> <p><b>Audit Team Findings:</b><br/>To be verified in the next surveillance visit.</p>                                                                                                                                                                     |
| 2 | <p><b>Feedbacks:</b><br/><u>Worker’s Representative – Pahang Estate</u><br/>No complaint made from the workers so far and company has been treating workers without discrimination.</p> <p><b>Management Responses:</b><br/>Estate will continue maintain the harmonization for its employees and treating them fairly.</p> <p><b>Audit Team Findings:</b><br/>No further issue.</p>                                                                                                                                |
| 3 | <p><b>Feedbacks:</b><br/><u>Gender Committee</u><br/>So far, there is no critical or any sexual harassment reported.</p> <p><b>Management Responses:</b><br/>Management will continue to maintain the mechanism in grievance and complaint regarding sexual harassment.</p> <p><b>Audit Team Findings:</b><br/>No further issue.</p>                                                                                                                                                                                |
| 4 | <p><b>Feedbacks:</b><br/><u>Contractors (Sri Jaya Hardwarde/Hup Shing Berjaya Enterprises/Kedai Makan Estate Pahang)</u><br/>So far, payment was made in timely manner and accurate to all the contractors engaged.</p> <p><b>Management Responses:</b><br/>Management will maintain good relationship with the contractors.</p> <p><b>Audit Team Findings:</b><br/>No further issue.</p>                                                                                                                           |
| 5 | <p><b>Feedbacks:</b><br/><u>Balai Polis Gambang</u><br/>- No criminal reported regarding Carotino complexes and the Police Officer appreciate if estate can provide the details of the foreign workers for the record keeping and references.</p> <p><b>Management Responses:</b><br/>- Estate and mill with together share their foreign worker’s name list and basic details to Balai Polis Gambang.</p> <p><b>Audit Team Findings:</b><br/>No further issue.</p>                                                 |
| 6 | <p><b>Feedbacks:</b><br/><u>Representative Kampung Tumpesel (Kg. Orang Asli)</u><br/>So far, no customary right issue occurred between the villagers of Kampung Tumpesel and Carotino complexes. Sometimes Carotino Estate will give support in providing water supply if requested and they lived in harmony with other villagers.</p> <p><b>Management Responses:</b><br/>Management will continue to maintain good relationship with the villagers.</p> <p><b>Audit Team Findings:</b><br/>No further issue.</p> |

| 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 Certification Unit has complied with the RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Carotino Palm Oil Mill Certification Unit is continued.</p> |                                                                                                                                                                                                                                                                                                                                                                           |
| Report prepared by                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Acceptance of Assessment Conclusion                                                                                                                                                                                                                                                                                                                                       |
| <p><b>Name:</b><br/>Mr Valence Shem</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <p><b>Name:</b><br/>Seow Chee Chiang.</p>                                                                                                                                                                                                                                                                                                                                 |
| <p><b>Company Name:</b><br/>BSI Services Malaysia Sdn Bhd</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <p><b>Company Name:</b><br/>Carotino/JC Chang Group</p>                                                                                                                                                                                                                                                                                                                   |
| <p><b>Title:</b><br/>Lead auditor</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <p><b>Title:</b><br/>Sr. Manager.</p>                                                                                                                                                                                                                                                                                                                                     |
| <p><b>Signature:</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                           | <p><b>Signature:</b></p> <p><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><b>Date:</b> 20/7/2018</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <p><b>Date:</b> 20/7/2018</p>                                                                                                                                                                                                                                                                                                                                             |



**Appendix A: Summary of Findings**

| Criterion / Indicator                                                                                                                                                                                                                      | Assessment Findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Compliance |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| <b>Principle 1: Commitment to Transparency</b>                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |            |
| <b>Criterion 1.1:</b>                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |            |
| Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |            |
| 1.1.1                                                                                                                                                                                                                                      | There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making.<br>- Minor compliance -                                                                                                                                                                                                                                                                       | Complied   |
| 1.1.2                                                                                                                                                                                                                                      | Records of requests for information and responses shall be maintained.<br>-Major compliance                                                                                                                                                                                                                                                                                                                                                                                                                                   | Complied   |
| <b>Criterion 1.2:</b>                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |            |
| Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |            |
| 1.2.1                                                                                                                                                                                                                                      | Publicly available documents shall include, but are not necessary limited to:<br>• Land titles/user rights (Criterion 2.2);<br>• Occupational health and safety plans (Criterion 4.7);<br>• Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8);<br>• HCV documentation (Criteria 5.2 and 7.3);<br>• Pollution prevention and reduction plans (Criterion 5.6);<br>• Details of complaints and grievances (Criterion 6.3);<br>• Negotiation procedures (Criterion 6.4); | Complied   |

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| Criterion / Indicator                                                                                                                                                                                                                 | Assessment Findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Compliance                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                       |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|
| <ul style="list-style-type: none"> <li>Continual improvement plans (Criterion 8.1);</li> <li>Public summary of certification assessment report;</li> <li>Human Rights Policy (Criterion 6.13).</li> </ul> <p>- Major compliance –</p> | <p>In addition to the above documents, sustainability brochure can be found under link;<br/> <a href="http://www.carotino.com/userFiles/file/SustainabilityBro.pdf">http://www.carotino.com/userFiles/file/SustainabilityBro.pdf</a></p> <p>These documents highlight current JC Chang Group practices and their continual improvement plans. Besides the above documents, the policy on the followings are also available at Carotino Group website at<br/> <a href="http://www.carotino.com/sustainability-policies-57.aspx">http://www.carotino.com/sustainability-policies-57.aspx</a> :</p> <ol style="list-style-type: none"> <li>Environment</li> <li>Equal Opportunity</li> <li>Sexual Harassment</li> <li>Occupational Safety &amp; Health</li> <li>Social and Human Rights</li> <li>Corruption Prevention</li> </ol> <p>In addition to the website, the policies were also displayed at various locations including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                       |
| <p><b>Criteria 1.3:</b><br/>           Growers and millers commit to ethical conduct in all business operations and transactions.</p>                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                       |
| 1.3.1                                                                                                                                                                                                                                 | <p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.</p> <p>-Minor compliance</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <p>Corruption Prevention Policy which incorporated various aspect of committing to a code of ethical conduct and integrity has been established since 04 September 2015 and signed by the mill director.</p> <p>The policy has been documented and communicated to all levels of the workforce and operations on 20-21/1/17 in Carotino POM, 31/01/2018 in Asia estate (117 workers) and 01/03/2017, 15/06/2017, 01/07/2017 and 08/09/2017 in Pahang estate.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Complied              |
| <p><b>Principle 2: Compliance with applicable laws and regulations</b></p>                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                       |
| <p><b>Criterion 2.1:</b><br/>           There is compliance with all applicable local, national and ratified international laws and regulations.</p>                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                       |
| 2.1.1                                                                                                                                                                                                                                 | <p>Evidence of compliance with relevant legal requirements shall be available.</p> <p>- Major compliance -</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <p>Carotino POM has obtained and renewed license and permits as required by the law. Amongst the licenses or permit viewed were:</p> <ol style="list-style-type: none"> <li>MPOB license: 500356604000 (validity period 1/11/2017 - 31/10/2018) for 144,000MT</li> <li>DOE License/Jadual Pematuhan: JP/KKS/2017/2018/003216 (validity period 1/7/2017 - 30/6/2018) for 45MT/hr and method of POME discharge is land application. BOD limit is &lt; 500 mg/l.</li> <li>Water usage license: SWUL/LPSA/70/2017 (validity period until 31/12/2017) by Director of Water Resources Pahang. Renewal application dated 29/12/17 to Pahang State Government Secretary Office. Application has been approved; payment receipt verified dated 9/1/18.</li> <li>Energy commission license; license no.:2017/00189; serial no.: 20236 (validity period 28/2/2017 – 27/2/2018) for 3248 kW installation capacity.</li> <li>Poison License, Permit to purchase, store and use of sodium hydroxide, permit# 003319, register# CC0022/2018. Valid until December 2018.</li> <li>Diesel permit, Serial# C026384, Diesel: 16,000 litre, expired on 16/4/18. Ref number; KPDNKK/TLOH/600-5/1/17/16/90-D</li> </ol> | Major non-conformance |

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| Criterion / Indicator | Assessment Findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Compliance                                         |        |        |           |        |                   |           |        |               |          |        |                   |            |        |                     |            |        |                     |            |        |                     |            |        |                     |            |   |                                             |             |   |                                              |          |   |                                                    |  |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|--------|--------|-----------|--------|-------------------|-----------|--------|---------------|----------|--------|-------------------|------------|--------|---------------------|------------|--------|---------------------|------------|--------|---------------------|------------|--------|---------------------|------------|---|---------------------------------------------|-------------|---|----------------------------------------------|----------|---|----------------------------------------------------|--|
|                       | <p>Sighted the Certificate of Fitness for machineries:</p> <table border="1" data-bbox="660 434 1273 943"> <thead> <tr> <th>CF No</th> <th>Expiry</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>PMD 15277</td> <td>5/2/19</td> <td>Water Tube Boiler</td> </tr> <tr> <td>PMT 75644</td> <td>5/2/19</td> <td>Softener tank</td> </tr> <tr> <td>PMD 3202</td> <td>5/2/19</td> <td>Water Tube Boiler</td> </tr> <tr> <td>PH PMT3409</td> <td>5/2/19</td> <td>Vertical Sterilizer</td> </tr> <tr> <td>PH PMT3410</td> <td>5/2/19</td> <td>Vertical Sterilizer</td> </tr> <tr> <td>PH PMT3412</td> <td>5/2/19</td> <td>Vertical Sterilizer</td> </tr> <tr> <td>PH PMT3411</td> <td>5/2/19</td> <td>Vertical Sterilizer</td> </tr> <tr> <td>PH PPA1139</td> <td>-</td> <td>General installation license (biogas plant)</td> </tr> <tr> <td>PH PPA 1137</td> <td>-</td> <td>General installation license (biogas engine)</td> </tr> <tr> <td>PHP917/2</td> <td>-</td> <td>General installation license (clarification plant)</td> </tr> </tbody> </table> <p>Last UPV and SB inspection was carried out on 6/11/17.<br/>Generally, no major issues highlighted by DOSH inspector.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | CF No                                              | Expiry | Remark | PMD 15277 | 5/2/19 | Water Tube Boiler | PMT 75644 | 5/2/19 | Softener tank | PMD 3202 | 5/2/19 | Water Tube Boiler | PH PMT3409 | 5/2/19 | Vertical Sterilizer | PH PMT3410 | 5/2/19 | Vertical Sterilizer | PH PMT3412 | 5/2/19 | Vertical Sterilizer | PH PMT3411 | 5/2/19 | Vertical Sterilizer | PH PPA1139 | - | General installation license (biogas plant) | PH PPA 1137 | - | General installation license (biogas engine) | PHP917/2 | - | General installation license (clarification plant) |  |
| CF No                 | Expiry                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Remark                                             |        |        |           |        |                   |           |        |               |          |        |                   |            |        |                     |            |        |                     |            |        |                     |            |        |                     |            |   |                                             |             |   |                                              |          |   |                                                    |  |
| PMD 15277             | 5/2/19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Water Tube Boiler                                  |        |        |           |        |                   |           |        |               |          |        |                   |            |        |                     |            |        |                     |            |        |                     |            |        |                     |            |   |                                             |             |   |                                              |          |   |                                                    |  |
| PMT 75644             | 5/2/19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Softener tank                                      |        |        |           |        |                   |           |        |               |          |        |                   |            |        |                     |            |        |                     |            |        |                     |            |        |                     |            |   |                                             |             |   |                                              |          |   |                                                    |  |
| PMD 3202              | 5/2/19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Water Tube Boiler                                  |        |        |           |        |                   |           |        |               |          |        |                   |            |        |                     |            |        |                     |            |        |                     |            |        |                     |            |   |                                             |             |   |                                              |          |   |                                                    |  |
| PH PMT3409            | 5/2/19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Vertical Sterilizer                                |        |        |           |        |                   |           |        |               |          |        |                   |            |        |                     |            |        |                     |            |        |                     |            |        |                     |            |   |                                             |             |   |                                              |          |   |                                                    |  |
| PH PMT3410            | 5/2/19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Vertical Sterilizer                                |        |        |           |        |                   |           |        |               |          |        |                   |            |        |                     |            |        |                     |            |        |                     |            |        |                     |            |   |                                             |             |   |                                              |          |   |                                                    |  |
| PH PMT3412            | 5/2/19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Vertical Sterilizer                                |        |        |           |        |                   |           |        |               |          |        |                   |            |        |                     |            |        |                     |            |        |                     |            |        |                     |            |   |                                             |             |   |                                              |          |   |                                                    |  |
| PH PMT3411            | 5/2/19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Vertical Sterilizer                                |        |        |           |        |                   |           |        |               |          |        |                   |            |        |                     |            |        |                     |            |        |                     |            |        |                     |            |   |                                             |             |   |                                              |          |   |                                                    |  |
| PH PPA1139            | -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | General installation license (biogas plant)        |        |        |           |        |                   |           |        |               |          |        |                   |            |        |                     |            |        |                     |            |        |                     |            |        |                     |            |   |                                             |             |   |                                              |          |   |                                                    |  |
| PH PPA 1137           | -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | General installation license (biogas engine)       |        |        |           |        |                   |           |        |               |          |        |                   |            |        |                     |            |        |                     |            |        |                     |            |        |                     |            |   |                                             |             |   |                                              |          |   |                                                    |  |
| PHP917/2              | -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | General installation license (clarification plant) |        |        |           |        |                   |           |        |               |          |        |                   |            |        |                     |            |        |                     |            |        |                     |            |        |                     |            |   |                                             |             |   |                                              |          |   |                                                    |  |
|                       | <p>No compliance audit carried out by 3rd party to check compliance against the Compliance Schedule as to date. Noise boundary monitoring was not carried out as to date. The latest additional noise monitoring carried out on 17/8/17 did not cover the noise boundary monitoring requirement as per compliance schedule. Thus, a major NC was raised.</p> <p>There is one female employee ID: G0003 (CPOM) has worked for night shift (after 10 pm) as per pay slip for Jun'17, Nov'17 and Jan'18 and this is not comply with Act 265 EMPLOYMENT ACT 1955, PART VIII, EMPLOYMENT OF WOMEN, Prohibition of night work:</p> <p><i>34. (1) Except in accordance with regulations made under this Act or any exemption granted under the proviso to this subsection no employer shall require any female employee to work in any industrial or agricultural undertaking between the hours of ten o'clock in the evening and five o'clock in the morning nor commence work for the day without having had a period of eleven consecutive hours free from such work:</i></p> <p><i>Provided that the Director General may, on application made to him in any particular case, exempt in writing any female employee or class of female employees from any restriction in this subsection, subject to any conditions he may impose.</i></p> <p><u>Asia Oil Palm Estate</u></p> <ul style="list-style-type: none"> <li>Electrical installation license, license# 2017/00679 for 65 kW valid until 17/3/18</li> <li>Diesel permit # C023570, license holder: Asia Oil Palm Sdn Bhd, validity 10/1/18 to 9/1/19, 13,638 lt</li> <li>MPOB license # 501433902000, validity 1/4/2017 to</li> </ul> |                                                    |        |        |           |        |                   |           |        |               |          |        |                   |            |        |                     |            |        |                     |            |        |                     |            |        |                     |            |   |                                             |             |   |                                              |          |   |                                                    |  |

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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
|                                                                                                                                                                                           |                                                                                                                                                     | 31/3/2018, 2,140.82 Ha, Menjual dan Mengalih FFB, license holder Asia Oil Palm Sdn Bhd <ul style="list-style-type: none"> <li>• Lesen Penggunaan Sumber Air, License#: SWUL/LPSA/61/2017, license holder: Asia Oil Palm Sdn Bhd, validity: 1/1/2017 – 31/12/2017. Application to renew was done on 17/12/2017 to Badan Kawal Selia Air (BKSA) but the license has yet to be issued. Nonetheless, a permission from BKSA through e-mail dated 19/12/2017 was received to allow the estate to extract water from Sg. Rami</li> </ul>                                                                                       |            |
|                                                                                                                                                                                           |                                                                                                                                                     | Pahang OP: <ul style="list-style-type: none"> <li>• Diesel permit # C009966, license holder: Pahang Enterprise Palm Sdn Bhd, validity 22/6/17 to 21/6/18, 15,000 lt</li> <li>• MPOB license # 501382102000, validity 1/4/2017 to 31/3/2018, 2,140.75 Ha, <i>Menjual dan Mengalih FFB</i>, license holder Pahang Enterprise Sdn Bhd</li> <li>• <i>Perakuan Penentuan Timbang dan Sukat</i>, #B12455878, dated 18/8/2017</li> </ul>                                                                                                                                                                                        |            |
| 2.1.2                                                                                                                                                                                     | A documented system, which includes written information on legal requirements, shall be maintained.<br>- Minor compliance -                         | A list and copies of legal documents and international treaties and agreements were available for verification. Changes in law was normally tracked through www.lawnet.com.my. The person responsible for monitoring compliance to laws and regulations is formally identified in the guidelines. The Unit maintain copy of relevant laws and legislation relevant to palm oil mill and the plantation operation as per listed in the standard.                                                                                                                                                                          | Complied   |
| 2.1.3                                                                                                                                                                                     | A mechanism for ensuring compliance shall be implemented.<br>- Minor compliance -                                                                   | Mechanism for ensuring compliance is described in the "Mechanism of Tracking Law Changes" – sustainability team to monitor implementation/updating of information via RSPO internal audit in 2 month basis. Internal audit was last done on 12-14/12/2017 by Mr Seow Chee Chiang. It was also noted that the list of permit/license was last updated on 7/11/2017 at Pahang OP.                                                                                                                                                                                                                                          | Complied   |
| 2.1.4                                                                                                                                                                                     | A system for tracking any changes in the law shall be implemented.<br>- Minor compliance -                                                          | System for tracking the changes in the law is addressed in SOP on Mechanism to Trace Changes in Legal Requirements" [doc. No.: E/005-07/2017, dated 6/1/2017. Among the mechanisms spelt out in the SOP were: <ul style="list-style-type: none"> <li>- Head office subscribes to the Malaysia Gazette on-Line (www.lawnet.com.my) – clause 1</li> <li>- Information from MPOA, MPOB, and other organizations to HQ – clause 7</li> <li>- Circular/letter received from government agencies by the estate/mill managers</li> </ul> Verified the updated legal register dated 31/1/17 with the updated legal requirements. | Complied   |
| <b>Criterion 2.2:</b><br>The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights. |                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |            |
| 2.2.1                                                                                                                                                                                     | Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available.<br>- Major compliance - | Asia OP: 6 land titles with total Ha of 2,140.82 – sampled: #24500 – 438.9 Ha, owner: Asia Oil Palm Sdn Bhd, lease period 19/6/1980 – 18/6/2079, term: for OP plantation #24502 – 885 Ha, owner: Asia Oil Palm Sdn Bhd, lease period 3/4/1972 – 2/4/2071, term: for OP plantation                                                                                                                                                                                                                                                                                                                                        | Complied   |

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|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
|                                                                                                                                                                                          | <p>#24504 – 117.2 Ha, owner: Asia Oil Palm Sdn Bhd, lease period 13/6/1974 – 12/6/2073, term: for OP plantation</p> <p>Pahang OP: 9 land titles with total Ha of 2,140.75. At the moment, the type of the title is only “<i>Hak Milik Sementara</i>” (Temporary ownership). A licensed surveyor was hired to resurvey the area and submit a survey report to <i>Pejabat Tanah Kuantan</i> in order to obtain the Final Title. As at September 2017, the Final Title has been submitted to <i>Pengarah Tanah dan Galian</i> by <i>Pejabat Tanah Kuantan</i> for registration [ref.: e-mail from Lee Swee Siang dan Rakan-rakan, Jurukur Berlesen, Johor Baharu to Mr. Seow (Sr. Manager)] and now pending for approval.</p> <p>– sampled:</p> <p>#10806 – 296.64 Ha, owner: Pahang Enterprise Sdn Bhd, lease period 13/6/1974 – 12/6/2073, term: for OP plantation<br/>           #3850 – 67.99 Ha, owner: Pahang Enterprise Sdn Bhd, lease period 29/6/1978 – 28/6/2077, term: for OP plantation<br/>           #3849 – 20.23 Ha, owner: Pahang Enterprise Sdn Bhd, lease period 29/6/1978 – 28/6/2077, term: for OP plantation<br/>           #3842 – 418.45 Ha, owner: Pahang Enterprise Sdn Bhd, lease period 12/6/1978 – 11/6/2077, term: for OP plantation</p> |                |
| 2.2.2                                                                                                                                                                                    | <p>Legal boundaries shall be clearly demarcated and visibly maintained.<br/>- Minor compliance -</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Complied       |
| 2.2.3                                                                                                                                                                                    | <p>Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC).<br/>- Minor compliance -</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Complied       |
| 2.2.4                                                                                                                                                                                    | <p>There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved.<br/>-Major compliance</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Not applicable |
| 2.2.5                                                                                                                                                                                    | <p>For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).<br/>-Minor compliance</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Not applicable |
| 2.2.6                                                                                                                                                                                    | <p>To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations.<br/>-Major compliance</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Not applicable |
| <p><b>Criterion 2.3:</b><br/>Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                |

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|----------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| 2.3.1                                                                                                    | <p>Not applicable.</p> <p>The estate lands are legally owned by the company. The existing estates are not encumbered by any customary land rights. Interview with the surrounding communities and stakeholders confirm no disputes.</p>                                               | Not applicable |
| 2.3.2                                                                                                    | <p>There is no land dispute in the Carotino Unit at the time of audit. The land belongs to JC Chang Group with further verification of document and stakeholder interview. The estate is surrounded by neighbouring plantations and there is no village settlement near the area.</p> | Not applicable |
| 2.3.3                                                                                                    | <p>There is no land dispute in the Carotino Unit at the time of audit. The land belongs to JC Chang Group with further verification of document and stakeholder interview. The estate is surrounded by neighbouring plantations and there is no village settlement near the area.</p> | Not applicable |
| 2.3.4                                                                                                    | <p>There is no land dispute in the Carotino Unit at the time of audit. The land belongs to JC Chang Group with further verification of document and stakeholder interview. The estate is surrounded by neighbouring plantations and there is no village settlement near the area.</p> | Not applicable |
| <b>Principle 3: Commitment to long-term economic and financial viability</b>                             |                                                                                                                                                                                                                                                                                       |                |
| <b>Criterion 3.1:</b>                                                                                    |                                                                                                                                                                                                                                                                                       |                |
| There is an implemented management plan that aims to achieve long-term economic and financial viability. |                                                                                                                                                                                                                                                                                       |                |
| 3.1.1                                                                                                    | <p>Carotino/JC Chang Group has continued its commitment to long term sustainability and improvements through a capital expenditure programme. Carotino Palm Oil Mill and supply bases have made progress towards achieving their</p>                                                  | Complied       |

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| Criterion / Indicator                                                                                                                                                                                                                     | Assessment Findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Compliance |      |      |      |      |      |         |   |    |     |   |    |        |   |   |     |    |     |          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|------|------|------|------|------|---------|---|----|-----|---|----|--------|---|---|-----|----|-----|----------|
| appropriate, a business case for scheme smallholders.<br>- Major compliance -                                                                                                                                                             | performance production targets for the current financial year. OPEX projected for 3 years until 2021.                                                                                                                                                                                                                                                                                                                                                                                      |            |      |      |      |      |      |         |   |    |     |   |    |        |   |   |     |    |     |          |
| 3.1.2<br>An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available.<br>- Minor compliance - | The visited estates have prepared the replanting programme with minimum of 5 years projection. Below is the details of the programme in Ha unit:<br><table border="1"> <thead> <tr> <th></th> <th>2018</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td>Asia OP</td> <td>0</td> <td>65</td> <td>109</td> <td>0</td> <td>89</td> </tr> <tr> <td>Pahang</td> <td>0</td> <td>0</td> <td>104</td> <td>74</td> <td>130</td> </tr> </tbody> </table> |            | 2018 | 2019 | 2020 | 2021 | 2022 | Asia OP | 0 | 65 | 109 | 0 | 89 | Pahang | 0 | 0 | 104 | 74 | 130 | Complied |
|                                                                                                                                                                                                                                           | 2018                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 2019       | 2020 | 2021 | 2022 |      |      |         |   |    |     |   |    |        |   |   |     |    |     |          |
| Asia OP                                                                                                                                                                                                                                   | 0                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 65         | 109  | 0    | 89   |      |      |         |   |    |     |   |    |        |   |   |     |    |     |          |
| Pahang                                                                                                                                                                                                                                    | 0                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 0          | 104  | 74   | 130  |      |      |         |   |    |     |   |    |        |   |   |     |    |     |          |

**Principle 4: Use of appropriate best practices by growers and millers**

**Criterion 4.1:**

Operating procedures are appropriately documented, consistently implemented and monitored.

|                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |          |
|------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|
| 4.1.1<br>Standard Operating Procedures (SOPs) for estates and mills are documented<br>- Major compliance - | Estates and Oil Mill have maintained and revised if required, the Documented Standard Operating Procedures file that contains both the safe operating procedures and the procedures to implement the various major field operations. For example, among others, the Estate SOP Manual has procedures category for the following operations:<br>a) Road and Terrace construction for New Planting and Replanting (A/005-01/2008)<br>b) Nursery Establishment and Practices (A/006-01/2008)<br>c) Field planting (A/007-02/2011)<br>d) Pruning and Frond stacking (B/001-01/2008)<br>e) Weeding Regime & Practices ((B/004-01/2008)<br>f) Riparian Buffer Zone (C/001-02/2009)<br>g) Justifications for Pesticide Usage under IPM (Insecticide, Fungicide & Rodenticide) (B/008-14/2016)<br>h) Justifications for Pesticide Usage under IPM (Weedicides) (B/009-10/2015)<br>i) FFB Evacuation with MTG (D/003-01/2008)<br>j) FFB Harvesting and Evacuation (D/004-04/2015)<br>k) Fertiliser receipts, management and application (H/001-03/2016)<br>l) Integrated Pest & Disease Management (L/001-05/2014)<br>m) Rat control and baiting (L/002-07/2016)<br><br>The CCP SOP and Mill SOP for Carotino POM contains the procedures for all activities as below:<br>1) Reception Station (CCP/01-03/2013)<br>2) Grading Station (CCP/02-02/2016)<br>3) Press Station (CCP/03-01/2011)<br>4) Clarification Station (CCP/04-01/2011)<br>5) Nut Station (CCP/05-01/2011)<br>6) Kernel Station (CCP/06-01/2011)<br>7) Storage Station (CCP/07-02/2016)<br>8) Despatch CPO & PK (CCP/08-05/2016) | Complied |
|------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|

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| Criterion / Indicator                                                                                                                                  | Assessment Findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Compliance      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
|                                                                                                                                                        | <p>9) Reception Station (Q/001-02/2010)<br/>           10) Grading Station (Q/002-02/2008)<br/>           11) Fruit Handling Station (Q/003-02/2010)<br/>           12) Sterilizer Station (Q/004-01/2010)<br/>           13) Threshing Station (Q/005-02/2010)<br/>           14) Press Station (Q/006-01/2008)<br/>           15) Clarification Station (Q/007-01/2008)<br/>           16) Depericarper Station (Q/008-01/2008)<br/>           17) Nut &amp; Kernel Station (Q/009-01/2008)<br/>           18) Boiler Station (Q/010-01/2008)<br/>           19) Engine Room Station (Q/011-01/2008)<br/>           20) Water Treatment Plant (Q/012-01/2008)<br/>           21) Biogas Plant SOP</p> <p>Bahasa Malaysia is used as main language of communication.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                 |
| <p>4.1.2</p> <p>A mechanism to check consistent implementation of procedures shall be in place.<br/>           - Minor compliance -</p>                | <p>Company has mechanism to check the implementation of procedure through routine inspection by Mill Director Visit and 3<sup>rd</sup> party mill inspector which scheduled for twice a year. Mill and Plantation Director and 3<sup>rd</sup> party mill inspector report were verified. The Internal RSPO visit was conducted by Sustainability Department. The inspection/internal audit was covered all activities related to palm oil mill and oil palm agriculture practices.</p> <p><b><u>Carotino POM</u></b><br/>           Latest visit by and 3<sup>rd</sup> party mill inspector was on 5-7 June 2017. Refer to report# JCCL/CPOM/02/17 dated 30/6/17. Area that was audited as per the following:<br/>           i) FFB intake<br/>           ii) Mill crop production and despatch records<br/>           iii) Expenditures<br/>           iv) Vehicles<br/>           v) Labour Statistics/ Movement<br/>           vi) Stocktake<br/>           vii) Store management<br/>           viii) CAPEX<br/>           ix) Fixed asset annual review.</p> <p>The internal audit was conducted on 12-14/12/17 by Sustainability Department. There are total of 14 findings raised during the audit and the action plan was established and submitted to HQ. Verification will be done on site after 6 month by the audit team to check on effective implementation of the action taken.</p> <p><b><u>Pahang OP</u></b><br/>           Latest visit by Regional Controller visit was on 12-15/9/2017. The assessment was on labour force, financial resource and management, employees' welfare, field maintenance and upkeep, harvesting and crop production. The internal audit was conducted on 1/12/2017 by Sustainability Department.</p> | <p>Complied</p> |
| <p>4.1.3</p> <p>Records of monitoring and any actions taken shall be maintained and available, as appropriate.<br/>           - Minor compliance -</p> | <p>Records of monitoring (MPOB monthly report, Energy Commission report, Online Environmental Reporting and Self-Regulation reporting "EMT elements") were made available and maintained. Sample of records checked:</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>Complied</p> |



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|---------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
|                                                                                                                                                               |                                                                                                                                                                                                                                                   | <ul style="list-style-type: none"> <li>Self-regulation reporting dated 12/5/17 to DOE, Pahang [Appendic C – compliance form PPKAS (UB) 2014, PPKAS (BT) 2005 and KKS/GAM, pictures and related records as required under Compliance Schedule]</li> <li>Monthly report to MPOB, MPOB(EL) MF-4, MPOB(EL) PX 4-MF for January 2018 dated 2/2/18</li> <li>Energy commission report – December 2017, total generation 446,346 kWh report dated 2/1/18</li> </ul>                                                                       |            |
| 4.1.4                                                                                                                                                         | The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB).<br>- Major compliance -                                                                                                                                   | The mill does not accept crop from any third parties.                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Complied   |
| <b>Criterion 4.2:</b><br>Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield. |                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |            |
| 4.2.1                                                                                                                                                         | There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible.<br>- Minor compliance - | SOP-Methods of nutrient assessment for oil palm fertilizer recommendation (B/015-01/2013) and SOP-Soil and water conservation (C/002-01/2008) were established. Soil analysis and foliar sampling will be monitored on yearly basis. Both visited estates operate in accordance with the Agriculture Manual and standard operating procedures. The practices consistently monitored by estate operation management and regional controller. The recommendations for improvements are given to maintain the sustainable practices. | Complied   |
| 4.2.2                                                                                                                                                         | Records of fertiliser inputs shall be maintained.<br>- Minor compliance -                                                                                                                                                                         | Fertilizers were applied as per agronomist recommendation. The record kept have the information about application date, filed number, dosage applied per palm, type of fertilizer and number of applicators. Types of fertilizer applied were of straight and mixture. The dosage/palm/year generally was around 10kg.                                                                                                                                                                                                            | Complied   |
| 4.2.3                                                                                                                                                         | There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status.<br>- Minor compliance -                                                                                                                       | Leaf and soil nutrient analysis are commonly used in the diagnosis of fertilizer requirements in oil palms. The frequency for soil analysis and leaf sampling is conducted annually. The foliar sampling analysis reports by the company's agronomist were available at the estates.                                                                                                                                                                                                                                              | Complied   |
| 4.2.4                                                                                                                                                         | A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting.<br>- Minor compliance -                                                     | EFB application is done as part of nutrient recycling strategy and recorded regularly. All EFB were sourced from Carotino POM. The best practice of EFB application is described in the estate's SOP Manual. Records were available for verification.                                                                                                                                                                                                                                                                             | Complied   |
| <b>Criterion 4.3:</b><br>Practices minimise and control erosion and degradation of soils.                                                                     |                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |            |

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|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| 4.3.1<br>Maps of any fragile soils shall be available.<br>- Major compliance -                                                                                                               | Based on soil map, the visited estates have no soil that categorised as fragile.                                                                                                                                                                                             | Complied   |
| 4.3.2<br>A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific).<br>- Minor compliance -                         | In order to minimise erosion, basically the estates practiced were to construct terraces for oil palm planting and establishment of cover crop such as Mucuna sp. at slope areas. This was sighted during the field visit at both estates.                                   | Complied   |
| 4.3.3<br>A road maintenance programme shall be in place.<br>- Minor compliance -                                                                                                             | Road maintenance program for the current financial year was available for all the visited estates. Among the activities for the road maintenance are grading & compacting and resurfacing. Based on expenditure report, the progress to-date was in-line with the programme. | Complied   |
| 4.3.4<br>Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place.<br>- Minor compliance -                      | There was no peat soil at both of the estates.                                                                                                                                                                                                                               | Complied   |
| 4.3.5<br>Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing.<br>- Minor compliance - | There was no peat soil at both of the estates.                                                                                                                                                                                                                               | Complied   |
| 4.3.6<br>A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils).<br>- Minor compliance -                          | There was no fragile or problem soils at both of the estates.                                                                                                                                                                                                                | Complied   |
| <b>Criterion 4.4:</b>                                                                                                                                                                        |                                                                                                                                                                                                                                                                              |            |

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| Criterion / Indicator                                                        |                                                                                                                                                                                                                                    | Assessment Findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Compliance      |                    |     |    |       |    |       |    |      |    |    |   |   |   |                       |
|------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|--------------------|-----|----|-------|----|-------|----|------|----|----|---|---|---|-----------------------|
| Practices maintain the quality and availability of surface and ground water. |                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                 |                    |     |    |       |    |       |    |      |    |    |   |   |   |                       |
| 4.4.1                                                                        | An implemented water management plan shall be in place.<br>- Minor compliance -                                                                                                                                                    | <p>Water Management Plan is incorporated under Environmental and Social Improvement Plan which has been implemented and once in every 2 years. Sighted the water management plan for mill which has been reviewed on 15/9/17. The plan takes into account the efficient use of resources, ensure amongst other that the use of water did not impact on other users, avoid contamination of ground and surface water, and appropriate treatment of mill effluent.</p> <p><u>Carotino POM</u><br/>River water analysis done every 6 months as per the Water Management Plan. 3 sampling points were sampled (upstream [US], intake point [IP] and downstream[DS]). Checked the latest River Water Analysis Report done by Drew Ameroid (M) Sdn Bhd dated 2/1/18 for all the sampling points.</p> <p>Domestic water analysis was carried out once per year as per plan. Refer to the latest analysis report, by Drew Ameroid (M) Sdn Bhd dated 2/1/18. Result is found in compliance with Drinking Water Quality Standard (DWQS).</p>                                                                                                                                                                                                                                              | Complied        |                    |     |    |       |    |       |    |      |    |    |   |   |   |                       |
| 4.4.2                                                                        | Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated.<br>- Major compliance - | <p>Ref.: Guidelines on establishment of riparian buffer zone [C/001-01/2008]. Width of zones is guided by the followings:</p> <table border="1"> <thead> <tr> <th>River width (m)</th> <th>Riparian width (m)</th> </tr> </thead> <tbody> <tr> <td>&gt;40</td> <td>50</td> </tr> <tr> <td>20-40</td> <td>40</td> </tr> <tr> <td>10-20</td> <td>20</td> </tr> <tr> <td>5-10</td> <td>10</td> </tr> <tr> <td>&lt;5</td> <td>5</td> </tr> <tr> <td>3</td> <td>-</td> </tr> </tbody> </table> <p>PVC pipes painted with yellow were used to demarcate the Riparian Buffer Zones. Chemical spraying was also restricted within the Buffer Zones.</p> <p>At Asia OP, the upstream &amp; downstream of Sg Rami analysed once a year. Last analysis was done on 12/7/2017 [ref.: report # IE727/2017, by Sime Darby Research Sdn Bhd's lab] and second last on 10/1/2017 [ref.: report # IE27/2017, by Sime Darby Research Sdn Bhd's lab] vs. "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>Nevertheless, traces of herbicide spraying was found at riparian buffer zone at Field No. 97U of Pahang Oil Palm Estate. Therefore, a major non-conformity was assigned due to this lapse.</p> | River width (m) | Riparian width (m) | >40 | 50 | 20-40 | 40 | 10-20 | 20 | 5-10 | 10 | <5 | 5 | 3 | - | Major non-conformance |
| River width (m)                                                              | Riparian width (m)                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                 |                    |     |    |       |    |       |    |      |    |    |   |   |   |                       |
| >40                                                                          | 50                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                 |                    |     |    |       |    |       |    |      |    |    |   |   |   |                       |
| 20-40                                                                        | 40                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                 |                    |     |    |       |    |       |    |      |    |    |   |   |   |                       |
| 10-20                                                                        | 20                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                 |                    |     |    |       |    |       |    |      |    |    |   |   |   |                       |
| 5-10                                                                         | 10                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                 |                    |     |    |       |    |       |    |      |    |    |   |   |   |                       |
| <5                                                                           | 5                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                 |                    |     |    |       |    |       |    |      |    |    |   |   |   |                       |
| 3                                                                            | -                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                 |                    |     |    |       |    |       |    |      |    |    |   |   |   |                       |

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| Criterion / Indicator                                                                                                                                                                                                                                                    | Assessment Findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Compliance                                                                                          |                                  |                             |              |                                              |                                                                                                     |                 |                                               |               |                                              |           |        |                     |    |      |                                                                                   |      |    |     |     |             |      |                 |     |                |   |                    |   |                |    |                 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|----------------------------------|-----------------------------|--------------|----------------------------------------------|-----------------------------------------------------------------------------------------------------|-----------------|-----------------------------------------------|---------------|----------------------------------------------|-----------|--------|---------------------|----|------|-----------------------------------------------------------------------------------|------|----|-----|-----|-------------|------|-----------------|-----|----------------|---|--------------------|---|----------------|----|-----------------|
| <p>4.4.3</p> <p>Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6).<br/>- Minor compliance -</p> | <p>Water samples were regularly taken every week and tested to ensure compliance to DOE requirements at final discharge points. The water samples were sent to FELDA Laboratory for analysis. Records are maintained and verified on-site to have met the permissible regulatory limit under Carotino mill's compliance schedule. Refer to the analysis report last quarter (Oct – Dec 2017) and January 2018</p> <table border="1" data-bbox="660 607 1289 920"> <thead> <tr> <th>Month</th> <th>Final Discharge BOD<sub>3</sub></th> <th>Quarterly return submission</th> </tr> </thead> <tbody> <tr> <td>October 2017</td> <td>BOD<sub>3</sub>: 31 (report dated 2/10/17)</td> <td rowspan="3">License number: 003216, file reference number: AS:C31/152/000/042<br/><br/>Submitted on 9/1/18 to DOE</td> </tr> <tr> <td>November 2017</td> <td>BOD<sub>3</sub>: 33 (report dated 10/11/17)</td> </tr> <tr> <td>December 2017</td> <td>BOD<sub>3</sub>: 30 (report dated 4/12/17)</td> </tr> </tbody> </table> <p>Latest analysis result for January 2018 was verified. Refer to POME analysis dated 16/1/18, cert# 59/2018 by FELDA laboratory. Final discharge result as per below:</p> <table border="1" data-bbox="660 1021 1283 1554"> <thead> <tr> <th>Parameter</th> <th>Result</th> <th>Compliance Standard</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>8.42</td> <td rowspan="8">As per stipulated limit under mill's compliance schedule, JP/KKS/2017/2018/003216</td> </tr> <tr> <td>BOD3</td> <td>33</td> </tr> <tr> <td>COD</td> <td>249</td> </tr> <tr> <td>Total solid</td> <td>4706</td> </tr> <tr> <td>Suspended solid</td> <td>338</td> </tr> <tr> <td>Oil and Grease</td> <td>1</td> </tr> <tr> <td>Ammonical Nitrogen</td> <td>5</td> </tr> <tr> <td>Total Nitrogen</td> <td>22</td> </tr> </tbody> </table> <p>All parameter tested were in compliance with the stipulated limit</p> | Month                                                                                               | Final Discharge BOD <sub>3</sub> | Quarterly return submission | October 2017 | BOD <sub>3</sub> : 31 (report dated 2/10/17) | License number: 003216, file reference number: AS:C31/152/000/042<br><br>Submitted on 9/1/18 to DOE | November 2017   | BOD <sub>3</sub> : 33 (report dated 10/11/17) | December 2017 | BOD <sub>3</sub> : 30 (report dated 4/12/17) | Parameter | Result | Compliance Standard | pH | 8.42 | As per stipulated limit under mill's compliance schedule, JP/KKS/2017/2018/003216 | BOD3 | 33 | COD | 249 | Total solid | 4706 | Suspended solid | 338 | Oil and Grease | 1 | Ammonical Nitrogen | 5 | Total Nitrogen | 22 | <p>Complied</p> |
| Month                                                                                                                                                                                                                                                                    | Final Discharge BOD <sub>3</sub>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Quarterly return submission                                                                         |                                  |                             |              |                                              |                                                                                                     |                 |                                               |               |                                              |           |        |                     |    |      |                                                                                   |      |    |     |     |             |      |                 |     |                |   |                    |   |                |    |                 |
| October 2017                                                                                                                                                                                                                                                             | BOD <sub>3</sub> : 31 (report dated 2/10/17)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | License number: 003216, file reference number: AS:C31/152/000/042<br><br>Submitted on 9/1/18 to DOE |                                  |                             |              |                                              |                                                                                                     |                 |                                               |               |                                              |           |        |                     |    |      |                                                                                   |      |    |     |     |             |      |                 |     |                |   |                    |   |                |    |                 |
| November 2017                                                                                                                                                                                                                                                            | BOD <sub>3</sub> : 33 (report dated 10/11/17)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                     |                                  |                             |              |                                              |                                                                                                     |                 |                                               |               |                                              |           |        |                     |    |      |                                                                                   |      |    |     |     |             |      |                 |     |                |   |                    |   |                |    |                 |
| December 2017                                                                                                                                                                                                                                                            | BOD <sub>3</sub> : 30 (report dated 4/12/17)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                     |                                  |                             |              |                                              |                                                                                                     |                 |                                               |               |                                              |           |        |                     |    |      |                                                                                   |      |    |     |     |             |      |                 |     |                |   |                    |   |                |    |                 |
| Parameter                                                                                                                                                                                                                                                                | Result                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Compliance Standard                                                                                 |                                  |                             |              |                                              |                                                                                                     |                 |                                               |               |                                              |           |        |                     |    |      |                                                                                   |      |    |     |     |             |      |                 |     |                |   |                    |   |                |    |                 |
| pH                                                                                                                                                                                                                                                                       | 8.42                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | As per stipulated limit under mill's compliance schedule, JP/KKS/2017/2018/003216                   |                                  |                             |              |                                              |                                                                                                     |                 |                                               |               |                                              |           |        |                     |    |      |                                                                                   |      |    |     |     |             |      |                 |     |                |   |                    |   |                |    |                 |
| BOD3                                                                                                                                                                                                                                                                     | 33                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                     |                                  |                             |              |                                              |                                                                                                     |                 |                                               |               |                                              |           |        |                     |    |      |                                                                                   |      |    |     |     |             |      |                 |     |                |   |                    |   |                |    |                 |
| COD                                                                                                                                                                                                                                                                      | 249                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                     |                                  |                             |              |                                              |                                                                                                     |                 |                                               |               |                                              |           |        |                     |    |      |                                                                                   |      |    |     |     |             |      |                 |     |                |   |                    |   |                |    |                 |
| Total solid                                                                                                                                                                                                                                                              | 4706                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                     |                                  |                             |              |                                              |                                                                                                     |                 |                                               |               |                                              |           |        |                     |    |      |                                                                                   |      |    |     |     |             |      |                 |     |                |   |                    |   |                |    |                 |
| Suspended solid                                                                                                                                                                                                                                                          | 338                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                     |                                  |                             |              |                                              |                                                                                                     |                 |                                               |               |                                              |           |        |                     |    |      |                                                                                   |      |    |     |     |             |      |                 |     |                |   |                    |   |                |    |                 |
| Oil and Grease                                                                                                                                                                                                                                                           | 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                     |                                  |                             |              |                                              |                                                                                                     |                 |                                               |               |                                              |           |        |                     |    |      |                                                                                   |      |    |     |     |             |      |                 |     |                |   |                    |   |                |    |                 |
| Ammonical Nitrogen                                                                                                                                                                                                                                                       | 5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                     |                                  |                             |              |                                              |                                                                                                     |                 |                                               |               |                                              |           |        |                     |    |      |                                                                                   |      |    |     |     |             |      |                 |     |                |   |                    |   |                |    |                 |
| Total Nitrogen                                                                                                                                                                                                                                                           | 22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                     |                                  |                             |              |                                              |                                                                                                     |                 |                                               |               |                                              |           |        |                     |    |      |                                                                                   |      |    |     |     |             |      |                 |     |                |   |                    |   |                |    |                 |
| <p>4.4.4</p> <p>Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored.<br/>- Minor compliance -</p>                                                                                                                               | <p>Mill has maintained monitoring on water usage for processing which recorded on daily and summarised month end. Summary of 2 years water consumption trend:</p> <table border="1" data-bbox="660 1727 1289 1854"> <thead> <tr> <th>Financial Year (July-June)</th> <th>Consumption (m3/FFB)</th> </tr> </thead> <tbody> <tr> <td>FY 2016/2017</td> <td>1.23</td> </tr> <tr> <td>FY 2017/2018 (to date)</td> <td>1.23</td> </tr> </tbody> </table>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Financial Year (July-June)                                                                          | Consumption (m3/FFB)             | FY 2016/2017                | 1.23         | FY 2017/2018 (to date)                       | 1.23                                                                                                | <p>Complied</p> |                                               |               |                                              |           |        |                     |    |      |                                                                                   |      |    |     |     |             |      |                 |     |                |   |                    |   |                |    |                 |
| Financial Year (July-June)                                                                                                                                                                                                                                               | Consumption (m3/FFB)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                     |                                  |                             |              |                                              |                                                                                                     |                 |                                               |               |                                              |           |        |                     |    |      |                                                                                   |      |    |     |     |             |      |                 |     |                |   |                    |   |                |    |                 |
| FY 2016/2017                                                                                                                                                                                                                                                             | 1.23                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                     |                                  |                             |              |                                              |                                                                                                     |                 |                                               |               |                                              |           |        |                     |    |      |                                                                                   |      |    |     |     |             |      |                 |     |                |   |                    |   |                |    |                 |
| FY 2017/2018 (to date)                                                                                                                                                                                                                                                   | 1.23                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                     |                                  |                             |              |                                              |                                                                                                     |                 |                                               |               |                                              |           |        |                     |    |      |                                                                                   |      |    |     |     |             |      |                 |     |                |   |                    |   |                |    |                 |
| <p><b>Criterion 4.5:</b><br/>Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.</p>                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                     |                                  |                             |              |                                              |                                                                                                     |                 |                                               |               |                                              |           |        |                     |    |      |                                                                                   |      |    |     |     |             |      |                 |     |                |   |                    |   |                |    |                 |

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| Criterion / Indicator                                                                               |                                                                                                                                                                                                                                                            | Assessment Findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Compliance                 |                |                      |                                               |              |                                                                           |                                                                         |                                          |                                                                                                               |                                  |            |                                                                |                                                   |                             |                                                    |          |
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| 4.5.1                                                                                               | Implementation of Integrated Pest Management (IPM) plans shall be monitored.<br>- Major compliance -                                                                                                                                                       | Ref.: Guidelines on Integrated Pest and Disease Management of Oil Palm [L/001-06/2017]. The IPM plan includes the planting of beneficial plants and control of damage by rodents. Beneficial plants such as Tunera subulata, Antigonon Leptopus and Cassia were seen grown in the estates. Barn owls were also kept in the estates to suppress the population of rats. Census of rat and leaf-eating pest was regularly carried out to monitor the population of the pests. Appropriate action shall be taken should the population of pests are above the threshold levels.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Complied                   |                |                      |                                               |              |                                                                           |                                                                         |                                          |                                                                                                               |                                  |            |                                                                |                                                   |                             |                                                    |          |
| 4.5.2                                                                                               | Training of those involved in IPM implementation shall be demonstrated.<br>- Minor compliance -                                                                                                                                                            | <b>Pahang OP</b><br>1) Pest and Disease spraying – 20/6/2017 – attended by 22 workers & staff<br>2) Barn Owl Census training – 3/5/2017 – attended by 13 workers<br>3) Rat baiting training – 20/6/2017 - attended by 22 workers<br><br>Training on planting and maintenance of beneficial plant in accordance to “Stop for Planting of beneficial Plant” last conducted on 18/5/2017 – attended by 2 workers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Complied                   |                |                      |                                               |              |                                                                           |                                                                         |                                          |                                                                                                               |                                  |            |                                                                |                                                   |                             |                                                    |          |
| <b>Criterion 4.6:</b><br>Pesticides are used in ways that do not endanger health or the environment |                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                            |                |                      |                                               |              |                                                                           |                                                                         |                                          |                                                                                                               |                                  |            |                                                                |                                                   |                             |                                                    |          |
| 4.6.1                                                                                               | Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available.<br>- Major compliance - | Justification for all pesticides used was stated in the SOP for Justifications for Pesticide Usage under IPM (Insecticide, Fungicide & Rodenticide) (B/008-14/2016) and Justification for Weedicides Usage (B/009-11/2017). The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimize effect on non-target species. Example of the method and application as follow: <table border="1" data-bbox="657 1301 1289 2033"> <thead> <tr> <th>Method and type of control</th> <th>Ai of Chemical</th> <th>Rate and application</th> </tr> </thead> <tbody> <tr> <td>Foliar spray on leaf eating insect (immature)</td> <td>Cypermethrin</td> <td>i)Knapsack or power spray<br/>ii)0.05% (10ml/lit) solution of the chemical</td> </tr> <tr> <td>Trunk injection against leaf eating insects (mature palm above 8 years)</td> <td>Monocrotophos (55% w/w) or Methamidophos</td> <td>i) Inject 8 – 10 ml per palm by drilling a 15-20 cm hole on the trunk at 0.5-1.0 m above ground at 45° angle.</td> </tr> <tr> <td>Fungicide spray on nursery stage</td> <td>Thiram 80%</td> <td>32-64 gm per 16 - 18 lt of “Conventional Knapsack Spray” @ CKS</td> </tr> <tr> <td>Foliar spray on larvae of leaf eating insects for</td> <td>Bacillus Thuringiensis @ BT</td> <td>i) Knapsack spray of power spray at manufacturer’s</td> </tr> </tbody> </table> | Method and type of control | Ai of Chemical | Rate and application | Foliar spray on leaf eating insect (immature) | Cypermethrin | i)Knapsack or power spray<br>ii)0.05% (10ml/lit) solution of the chemical | Trunk injection against leaf eating insects (mature palm above 8 years) | Monocrotophos (55% w/w) or Methamidophos | i) Inject 8 – 10 ml per palm by drilling a 15-20 cm hole on the trunk at 0.5-1.0 m above ground at 45° angle. | Fungicide spray on nursery stage | Thiram 80% | 32-64 gm per 16 - 18 lt of “Conventional Knapsack Spray” @ CKS | Foliar spray on larvae of leaf eating insects for | Bacillus Thuringiensis @ BT | i) Knapsack spray of power spray at manufacturer’s | Complied |
| Method and type of control                                                                          | Ai of Chemical                                                                                                                                                                                                                                             | Rate and application                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                            |                |                      |                                               |              |                                                                           |                                                                         |                                          |                                                                                                               |                                  |            |                                                                |                                                   |                             |                                                    |          |
| Foliar spray on leaf eating insect (immature)                                                       | Cypermethrin                                                                                                                                                                                                                                               | i)Knapsack or power spray<br>ii)0.05% (10ml/lit) solution of the chemical                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                            |                |                      |                                               |              |                                                                           |                                                                         |                                          |                                                                                                               |                                  |            |                                                                |                                                   |                             |                                                    |          |
| Trunk injection against leaf eating insects (mature palm above 8 years)                             | Monocrotophos (55% w/w) or Methamidophos                                                                                                                                                                                                                   | i) Inject 8 – 10 ml per palm by drilling a 15-20 cm hole on the trunk at 0.5-1.0 m above ground at 45° angle.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                            |                |                      |                                               |              |                                                                           |                                                                         |                                          |                                                                                                               |                                  |            |                                                                |                                                   |                             |                                                    |          |
| Fungicide spray on nursery stage                                                                    | Thiram 80%                                                                                                                                                                                                                                                 | 32-64 gm per 16 - 18 lt of “Conventional Knapsack Spray” @ CKS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                            |                |                      |                                               |              |                                                                           |                                                                         |                                          |                                                                                                               |                                  |            |                                                                |                                                   |                             |                                                    |          |
| Foliar spray on larvae of leaf eating insects for                                                   | Bacillus Thuringiensis @ BT                                                                                                                                                                                                                                | i) Knapsack spray of power spray at manufacturer’s                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                            |                |                      |                                               |              |                                                                           |                                                                         |                                          |                                                                                                               |                                  |            |                                                                |                                                   |                             |                                                    |          |

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| Criterion / Indicator                                         | Assessment Findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Compliance                                                                              |                                     |                             |                           |                            |                               |                                                               |                                   |                                                                                         |                    |                                                                   |                                  |                          |      |                               |      |          |
|---------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|-------------------------------------|-----------------------------|---------------------------|----------------------------|-------------------------------|---------------------------------------------------------------|-----------------------------------|-----------------------------------------------------------------------------------------|--------------------|-------------------------------------------------------------------|----------------------------------|--------------------------|------|-------------------------------|------|----------|
|                                                               | <table border="1"> <tr> <td data-bbox="210 396 655 488">immature palms aged from 1-6 years</td> <td data-bbox="655 396 874 488">(biological control)</td> <td data-bbox="874 396 1299 488">recommended rate.</td> </tr> <tr> <td data-bbox="210 488 655 595">Circle for immature palms</td> <td data-bbox="655 488 874 595">Glufosinate ammonium 13.5%</td> <td data-bbox="874 488 1299 595">i) 120 ml per 16-18 litre CKS</td> </tr> <tr> <td data-bbox="210 595 655 801">Selective for broadleaves soft woodies, wild yam, will banana</td> <td data-bbox="655 595 874 801">Metsulfuron Methyl 20% + adjuvant</td> <td data-bbox="874 595 1299 801">i) 16-18 litre CKS (60 ml + 3 gm + 15 ml)<br/>ii) 10 litre CDA (400 ml + 20 gm + 100 ml)</td> </tr> <tr> <td data-bbox="210 801 655 1030">Selective for VOPs</td> <td data-bbox="655 801 874 1030">Imazapyr isopropylamm onium 11.9% + Glyphosate isopropylamine 41%</td> <td data-bbox="874 801 1299 1030">16-18 liter CKS (200ml + 400 ml)</td> </tr> </table>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | immature palms aged from 1-6 years                                                      | (biological control)                | recommended rate.           | Circle for immature palms | Glufosinate ammonium 13.5% | i) 120 ml per 16-18 litre CKS | Selective for broadleaves soft woodies, wild yam, will banana | Metsulfuron Methyl 20% + adjuvant | i) 16-18 litre CKS (60 ml + 3 gm + 15 ml)<br>ii) 10 litre CDA (400 ml + 20 gm + 100 ml) | Selective for VOPs | Imazapyr isopropylamm onium 11.9% + Glyphosate isopropylamine 41% | 16-18 liter CKS (200ml + 400 ml) |                          |      |                               |      |          |
| immature palms aged from 1-6 years                            | (biological control)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | recommended rate.                                                                       |                                     |                             |                           |                            |                               |                                                               |                                   |                                                                                         |                    |                                                                   |                                  |                          |      |                               |      |          |
| Circle for immature palms                                     | Glufosinate ammonium 13.5%                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | i) 120 ml per 16-18 litre CKS                                                           |                                     |                             |                           |                            |                               |                                                               |                                   |                                                                                         |                    |                                                                   |                                  |                          |      |                               |      |          |
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| 4.6.2                                                         | <p>Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided.<br/>           - Major compliance -</p> <p>Records of pesticides used (including active ingredients used and area treated, amount of active ingredients applied per ha and number of applications) were established and monitored. The records of weeding programme and herbicide master list was sighted.</p> <table border="1"> <tr> <td data-bbox="210 1205 655 1305"></td> <td data-bbox="655 1205 874 1305">FY17/18 (Last quarter Oct – Dec 17)</td> </tr> <tr> <td data-bbox="210 1305 655 1384"><b>Asia Oil Palm Estate</b></td> <td data-bbox="655 1305 874 1384"><b>Ai/ha</b></td> </tr> <tr> <td data-bbox="210 1384 655 1424">Glyphosate</td> <td data-bbox="655 1384 874 1424">2.74</td> </tr> <tr> <td data-bbox="210 1424 655 1485">Triclopyr Butoxy Ethyl Esther</td> <td data-bbox="655 1424 874 1485">0.5</td> </tr> <tr> <td data-bbox="210 1485 655 1547"><b>Pahang Oil Palm Estate</b></td> <td data-bbox="655 1485 874 1547"><b>Ai/ha</b></td> </tr> <tr> <td data-bbox="210 1547 655 1588">Metsulfuron Methyl</td> <td data-bbox="655 1547 874 1588">2.56</td> </tr> <tr> <td data-bbox="210 1588 655 1648">2, 4-D dimethyl ammonium</td> <td data-bbox="655 1588 874 1648">0.09</td> </tr> <tr> <td data-bbox="210 1648 655 1704">Triclopyr Butoxy Ethyl Esther</td> <td data-bbox="655 1648 874 1704">0.27</td> </tr> </table> |                                                                                         | FY17/18 (Last quarter Oct – Dec 17) | <b>Asia Oil Palm Estate</b> | <b>Ai/ha</b>              | Glyphosate                 | 2.74                          | Triclopyr Butoxy Ethyl Esther                                 | 0.5                               | <b>Pahang Oil Palm Estate</b>                                                           | <b>Ai/ha</b>       | Metsulfuron Methyl                                                | 2.56                             | 2, 4-D dimethyl ammonium | 0.09 | Triclopyr Butoxy Ethyl Esther | 0.27 | Complied |
|                                                               | FY17/18 (Last quarter Oct – Dec 17)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                         |                                     |                             |                           |                            |                               |                                                               |                                   |                                                                                         |                    |                                                                   |                                  |                          |      |                               |      |          |
| <b>Asia Oil Palm Estate</b>                                   | <b>Ai/ha</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                         |                                     |                             |                           |                            |                               |                                                               |                                   |                                                                                         |                    |                                                                   |                                  |                          |      |                               |      |          |
| Glyphosate                                                    | 2.74                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                         |                                     |                             |                           |                            |                               |                                                               |                                   |                                                                                         |                    |                                                                   |                                  |                          |      |                               |      |          |
| Triclopyr Butoxy Ethyl Esther                                 | 0.5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                         |                                     |                             |                           |                            |                               |                                                               |                                   |                                                                                         |                    |                                                                   |                                  |                          |      |                               |      |          |
| <b>Pahang Oil Palm Estate</b>                                 | <b>Ai/ha</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                         |                                     |                             |                           |                            |                               |                                                               |                                   |                                                                                         |                    |                                                                   |                                  |                          |      |                               |      |          |
| Metsulfuron Methyl                                            | 2.56                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                         |                                     |                             |                           |                            |                               |                                                               |                                   |                                                                                         |                    |                                                                   |                                  |                          |      |                               |      |          |
| 2, 4-D dimethyl ammonium                                      | 0.09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                         |                                     |                             |                           |                            |                               |                                                               |                                   |                                                                                         |                    |                                                                   |                                  |                          |      |                               |      |          |
| Triclopyr Butoxy Ethyl Esther                                 | 0.27                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                         |                                     |                             |                           |                            |                               |                                                               |                                   |                                                                                         |                    |                                                                   |                                  |                          |      |                               |      |          |
| 4.6.3                                                         | <p>Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines.<br/>           - Major compliance -</p> <p>The management encourage establishing biological control as per IPM plan. The implementation in the field is consistent with the JC Chang’s Group SOP. No prophylactic use of pesticides found at visited operating units.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Complied                                                                                |                                     |                             |                           |                            |                               |                                                               |                                   |                                                                                         |                    |                                                                   |                                  |                          |      |                               |      |          |
| 4.6.4                                                         | <p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the</p> <p>There are no Class 1A and Class1B at the Asia Oil Palm Estate and Pahang Oil Palm Estate during this assessment.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Complied                                                                                |                                     |                             |                           |                            |                               |                                                               |                                   |                                                                                         |                    |                                                                   |                                  |                          |      |                               |      |          |

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| Criterion / Indicator                                                                                                                                                                                                                                                                                                                                                                                                          | Assessment Findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Compliance           |                   |                |          |                   |                                      |     |        |               |                                            |     |         |                    |                          |    |         |       |            |     |         |            |                    |    |         |                 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-------------------|----------------|----------|-------------------|--------------------------------------|-----|--------|---------------|--------------------------------------------|-----|---------|--------------------|--------------------------|----|---------|-------|------------|-----|---------|------------|--------------------|----|---------|-----------------|
|                                                                                                                                                                                                                                                                                                                                                                                                                                | <p>The used of Paraquat was totally banned and replaced with systemic chemical.</p> <p>Asia – Chemical register 3/1/18, only class II, III and IV chemical used.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                      |                   |                |          |                   |                                      |     |        |               |                                            |     |         |                    |                          |    |         |       |            |     |         |            |                    |    |         |                 |
| <p>4.6.5</p> <p>Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7).</p> <p>- Major compliance -</p> | <p>Pesticides were handled, used or applied by trained workers applied in accordance with the product label. Latest training for pesticides handler was conducted on 27/11/17. Appropriate safety and application equipment were provided and used, i.e 3M 3200/3200F, anti-fog goggles, apron and wellington boots based on CHRA assessor’s recommendation. Sample of chemical safety data sheet (SDS) checked and available during site visit:</p> <table border="1" data-bbox="662 898 1291 1491"> <thead> <tr> <th>Chemical/ trade name</th> <th>Active ingredient</th> <th>Chemical Class</th> <th>Revision</th> </tr> </thead> <tbody> <tr> <td>Nufarm Glyphosate</td> <td>Glyphosate Isopropyl Amine (41% w/w)</td> <td>III</td> <td>2/9/15</td> </tr> <tr> <td>Garlon 250 EC</td> <td>Triclopyr-2-butoxyethyl ester (32.1 % w/w)</td> <td>III</td> <td>18/1/13</td> </tr> <tr> <td>HEXTAR 2,4-D Amine</td> <td>2, 4-D dimethyl ammonium</td> <td>II</td> <td>25/2/16</td> </tr> <tr> <td>Storm</td> <td>Flocumafen</td> <td>III</td> <td>4/12/14</td> </tr> <tr> <td>Ally 20 DF</td> <td>Metsulfuron Methyl</td> <td>IV</td> <td>19/6/14</td> </tr> </tbody> </table> <p>All precautions attached to the products (SDS and notice board) were properly observed, applied, and understood by workers based on the interview with staff and workers at visited estates.</p> | Chemical/ trade name | Active ingredient | Chemical Class | Revision | Nufarm Glyphosate | Glyphosate Isopropyl Amine (41% w/w) | III | 2/9/15 | Garlon 250 EC | Triclopyr-2-butoxyethyl ester (32.1 % w/w) | III | 18/1/13 | HEXTAR 2,4-D Amine | 2, 4-D dimethyl ammonium | II | 25/2/16 | Storm | Flocumafen | III | 4/12/14 | Ally 20 DF | Metsulfuron Methyl | IV | 19/6/14 | <p>Complied</p> |
| Chemical/ trade name                                                                                                                                                                                                                                                                                                                                                                                                           | Active ingredient                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Chemical Class       | Revision          |                |          |                   |                                      |     |        |               |                                            |     |         |                    |                          |    |         |       |            |     |         |            |                    |    |         |                 |
| Nufarm Glyphosate                                                                                                                                                                                                                                                                                                                                                                                                              | Glyphosate Isopropyl Amine (41% w/w)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | III                  | 2/9/15            |                |          |                   |                                      |     |        |               |                                            |     |         |                    |                          |    |         |       |            |     |         |            |                    |    |         |                 |
| Garlon 250 EC                                                                                                                                                                                                                                                                                                                                                                                                                  | Triclopyr-2-butoxyethyl ester (32.1 % w/w)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | III                  | 18/1/13           |                |          |                   |                                      |     |        |               |                                            |     |         |                    |                          |    |         |       |            |     |         |            |                    |    |         |                 |
| HEXTAR 2,4-D Amine                                                                                                                                                                                                                                                                                                                                                                                                             | 2, 4-D dimethyl ammonium                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | II                   | 25/2/16           |                |          |                   |                                      |     |        |               |                                            |     |         |                    |                          |    |         |       |            |     |         |            |                    |    |         |                 |
| Storm                                                                                                                                                                                                                                                                                                                                                                                                                          | Flocumafen                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | III                  | 4/12/14           |                |          |                   |                                      |     |        |               |                                            |     |         |                    |                          |    |         |       |            |     |         |            |                    |    |         |                 |
| Ally 20 DF                                                                                                                                                                                                                                                                                                                                                                                                                     | Metsulfuron Methyl                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | IV                   | 19/6/14           |                |          |                   |                                      |     |        |               |                                            |     |         |                    |                          |    |         |       |            |     |         |            |                    |    |         |                 |
| <p>4.6.6</p> <p>Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3).</p> <p>- Major compliance -</p>                                                                                                                                                                                         | <p>The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation. Based on CHRA assessor’s store assessment recommendation, the below action was taken for improvement as such;</p> <ul style="list-style-type: none"> <li>i) Ventilation system for adequate air flow</li> <li>ii) Warning sign (dark red letter against white background)</li> <li>iii) Safety Data Sheet (SDS) availability</li> <li>iv) Label of chemicals</li> <li>v) Spill control</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>Complied</p>      |                   |                |          |                   |                                      |     |        |               |                                            |     |         |                    |                          |    |         |       |            |     |         |            |                    |    |         |                 |

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| Criterion / Indicator                                                                                                                                                                                                                                                   | Assessment Findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Compliance           |                |        |          |                                      |                      |          |                                        |  |          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|----------------|--------|----------|--------------------------------------|----------------------|----------|----------------------------------------|--|----------|
| 4.6.7<br>Application of pesticides shall be by proven methods that minimise risk and impacts.<br>- Minor compliance -                                                                                                                                                   | The quantity of agrochemicals required for various field conditions are documented and justified in the SOP for Justifications for Pesticide Usage under IPM (Insecticide, Fungicide & Rodenticide) (B/008-14/2016). The implementation in the field is consistent with the SOP. As to date, there was no outbreak of pest and disease.                                                                                                                                                                                                                                                                                                      | Complied             |                |        |          |                                      |                      |          |                                        |  |          |
| 4.6.8<br>Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application.<br>- Major compliance - | No aerial spray at Carotino Production Unit                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Complied             |                |        |          |                                      |                      |          |                                        |  |          |
| 4.6.9<br>Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8).<br>- Minor compliance -                                     | There is no associated smallholder at Carotino Production Unit. Training records for staff and workers on chemical application and IPM implementation were available and verified during on-site assessment. Sample of training checked:<br><br><table border="1"> <thead> <tr> <th>Date</th> <th>Training Topic</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>27/11/17</td> <td>Chemical usage and spraying training</td> <td>Asia Oil Palm Estate</td> </tr> <tr> <td>18/10/17</td> <td>IPM training (bagworm and rat baiting)</td> <td></td> </tr> </tbody> </table>                                                               | Date                 | Training Topic | Estate | 27/11/17 | Chemical usage and spraying training | Asia Oil Palm Estate | 18/10/17 | IPM training (bagworm and rat baiting) |  | Complied |
| Date                                                                                                                                                                                                                                                                    | Training Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Estate               |                |        |          |                                      |                      |          |                                        |  |          |
| 27/11/17                                                                                                                                                                                                                                                                | Chemical usage and spraying training                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Asia Oil Palm Estate |                |        |          |                                      |                      |          |                                        |  |          |
| 18/10/17                                                                                                                                                                                                                                                                | IPM training (bagworm and rat baiting)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                      |                |        |          |                                      |                      |          |                                        |  |          |
| 4.6.10<br>Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3).<br>- Minor compliance -                                                                               | The management dispose the empty containers per schedule waste regulation.<br>Proper disposal of waste material in accordance to company procedures and understood by workers and managers. Interview with management team and employees reveal that proper disposal of waste material is understood. There is no any issue of burning of waste materials observed at visited line sites (Asia Oil Palm Estate and Pahang Oil Palm Estate). Waste recycling programme (3R) and recyclable and domestic waste promoted by the management.                                                                                                     | Complied             |                |        |          |                                      |                      |          |                                        |  |          |
| 4.6.11<br>Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated.<br>- Major compliance -                                                                                        | <u>Asia Palm Oil Estate</u><br>Annual medical surveillance for sprayers and pesticide operators were conducted by registered OHD, HQ/08/DOC/00/614(0) under Occumed Consultancy & Services Sdn Bhd on 26/10/17. Based on USECHH 3 and USECHH 4, all workers were found fit to work with no detrimental of health.<br><br><u>Pahang Oil Palm Estate</u><br>Annual medical surveillance for sprayers and pesticide operators were conducted by registered OHD, HQ/08/DOC/00/614(0) under Occumed Consultancy & Services Sdn Bhd on 26/10/17. Based on USECHH 3 and USECHH 4, all workers were found fit to work with no detrimental of health. | Complied             |                |        |          |                                      |                      |          |                                        |  |          |



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| Criterion / Indicator                                                                                                                                                                                 | Assessment Findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Compliance                |                         |                  |        |          |     |              |                      |                |     |              |  |                |     |              |                         |          |
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| 4.6.12<br>No work with pesticides shall be undertaken by pregnant or breast-feeding women.<br>- Major compliance -                                                                                    | <p>There are women works with pesticides at all visited estates. For those who were still within reproductive age, urine pregnancy test (UPT) was conducted by EHA to confirm and check the pregnancy status for those who exposed to chemical i.e store keeper, chemical mixer and sprayer. Refer to summary of medical check-up as at January 2018 as per the following:</p> <table border="1" data-bbox="660 607 1289 965"> <thead> <tr> <th>Employee /passport number</th> <th>Health Status</th> <th>Pregnancy Status</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>AR732683</td> <td>Fit</td> <td>UPT-negative</td> <td>Asia Oil Palm Estate</td> </tr> <tr> <td>**08*5-06-**26</td> <td>Fit</td> <td>UPT-negative</td> <td></td> </tr> <tr> <td>**022*-03-5**6</td> <td>Fit</td> <td>UPT-negative</td> <td>Pahang Oil Palm Estate1</td> </tr> </tbody> </table>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Employee /passport number | Health Status           | Pregnancy Status | Estate | AR732683 | Fit | UPT-negative | Asia Oil Palm Estate | **08*5-06-**26 | Fit | UPT-negative |  | **022*-03-5**6 | Fit | UPT-negative | Pahang Oil Palm Estate1 | Complied |
| Employee /passport number                                                                                                                                                                             | Health Status                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Pregnancy Status          | Estate                  |                  |        |          |     |              |                      |                |     |              |  |                |     |              |                         |          |
| AR732683                                                                                                                                                                                              | Fit                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | UPT-negative              | Asia Oil Palm Estate    |                  |        |          |     |              |                      |                |     |              |  |                |     |              |                         |          |
| **08*5-06-**26                                                                                                                                                                                        | Fit                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | UPT-negative              |                         |                  |        |          |     |              |                      |                |     |              |  |                |     |              |                         |          |
| **022*-03-5**6                                                                                                                                                                                        | Fit                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | UPT-negative              | Pahang Oil Palm Estate1 |                  |        |          |     |              |                      |                |     |              |  |                |     |              |                         |          |
| <b>Criterion 4.7:</b><br>An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                           |                         |                  |        |          |     |              |                      |                |     |              |  |                |     |              |                         |          |
| 4.7.1<br>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.<br>- Major compliance - | <p>Company has established safety and health policy signed by Mr. Tay Chwee Leong, Mill Director dated 1<sup>st</sup> July 2016. Safety Policy has been made publicly available for all workers and related stakeholders through notice board at the Mill and Estate’s office compounds. The policy was communicated to all workers and staffs accordingly through Safety &amp; Health Policy Briefing. Latest session was conducted in 4/11/17. Safety and Health (OSH) Plan for Mill and Estates was established, dated 1/7/2017 which was include the safety policy, safety legislation, safety committee, safe operating procedure, training, workplace inspection, safety signage, ERP, fire plan and OSH compliance monitoring.</p> <p><b>i) Chemical Health Risk Assessment (CHRA)</b><br/>           The CHRA was conducted on 14/1/2013 (Mill Operation) and 9/3/2016 (Biogass Plant) by Procoma Environmental (M) Sdn Bhd (JKKP HIE 127/171-2(129). The OSH action plan was established to capture all the recommendation from the assessor. New re-visited CHRA was carried out on 24/1/18 by Procoma Environmental (M) Sdn Bhd. The report is still in progress and will be further verified in the next audit</p> <p><b>ii) Medical Surveillance</b><br/>           3 operators were sent for medical surveillance on 3/3/2017 for those who are involved with chemical (for employee that exposed to Schedule II chemical (N-Hexane) under USECHH Regulation 2000.), refer to medical surveillance report by registered OHD, HQ/08/DOC/00/601 under Ar Razi OHS Clinic. Based on USECHH 3 and 4, all the lab operators were found fit with no detrimental of health.</p> <p><b>iii) Noise Exposure Monitoring (Area and Personnel Monitoring)</b></p> | Complied                  |                         |                  |        |          |     |              |                      |                |     |              |  |                |     |              |                         |          |

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| Criterion / Indicator | Assessment Findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Compliance |                |                   |                                                                                    |                              |
|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|-------------------|------------------------------------------------------------------------------------|------------------------------|
|                       | <p>Additional noise exposure monitoring was conducted on 17/8/17 by Procoma Environmental (M) Sdn Bhd. The monitoring was carried for the new 35 mt/hr boiler that was commissioned in July 2017. The annual and baseline audiometric testing was conducted on 10/8/2017 by Procoma Environmental (M) Sdn Bhd (HQ/08/DOC/00/695). Total of 29 workers sent for testing. 1 worker reported to have Standard Threshold Shift (STS) and 2 workers having severe hearing impairment.</p> <p><b>iv) Local Exhaust Ventilation (LEV) Testing &amp; Inspection</b><br/>The latest LEV inspection was conducted on 12/4/17 by Procoma Environmental (M) Sdn Bhd, JKPP HIE 127/171-3/2(23). Based on the examination and testing results, it shows that the face velocity measured for the fume cupboard complied with ACGIH specification.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |            |                |                   |                                                                                    |                              |
| <p>4.7.2</p>          | <p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.<br/>- Major compliance -</p> <p>The management adapt and documented the guidelines from DOSH as their procedure namely "Garis Panduan bagi Pengenalpastian Hazard, Penaksiran Risiko dan Kawalan Risiko (HIRARC)" and made available all visited management units.</p> <p>The HIRARC was established and all the activities were registered and reviewed in the HIRARC on 1/9/2016 (Carotino POM), Asia Oil Palm Estate (21/6/17) and Pahang Oil Palm Estate 1 (18/7/17)</p> <p>Eg: Weighbridge, Ramp, Threshing Station, Pressing Station, Clarification, Nut Cracking Station, Kernel Plant, Kernel Storage, CPO Storage, Boiler Station, Engine room, workshop, General-cleaning and others, Store, EFB Press, Laboratory, WTP, WWTP, Sterilizer, EFB Shredder, Rotating equipment (airlocks, nut cracker), Welding activity, Lab (oil extraction), biogas plant, solvent plant, spraying, chemical mixing, triple rinse , Drainage and irrigation, Harvesting, loose fruit picking Pruning and raking, nursery, roads and terrace construction, drain construction, culvert &amp; bridge construction, selective weeding, manuring, scout harvesting, FFB internal transport and external transport and workshop.</p> <p>Additional HIRARC identified for mechanized operation (power spray and spreader) dated 18/7/17.</p> <p><b>Chemical Health Risk Assessment (CHRA)</b><br/>Re-assessment of CHRA for Asia Oil Palm Estate was conducted on 13/1/2017 by competent DOSH assessor, JKPP IH 127/171-2(08) for 9 specific work units. Report dated 28/1/17 was made available during assessment. Specific recommendation given by the assessor;</p> <table border="1" data-bbox="659 1883 1294 2024"> <thead> <tr> <th data-bbox="659 1883 911 1912">Work Unit</th> <th data-bbox="911 1883 1294 1912">Recommendation</th> </tr> </thead> <tbody> <tr> <td data-bbox="659 1912 911 2024">Pesticide handler</td> <td data-bbox="911 1912 1294 2024">i) PPE requirement:<br/>3M 3200 half face respirator with 3311K-55<br/>Nitrile glove</td> </tr> </tbody> </table> | Work Unit  | Recommendation | Pesticide handler | i) PPE requirement:<br>3M 3200 half face respirator with 3311K-55<br>Nitrile glove | <p>Major non-conformance</p> |
| Work Unit             | Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |            |                |                   |                                                                                    |                              |
| Pesticide handler     | i) PPE requirement:<br>3M 3200 half face respirator with 3311K-55<br>Nitrile glove                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |            |                |                   |                                                                                    |                              |

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| Criterion / Indicator |                                                                                                                                             | Assessment Findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                          | Compliance |                |                   |                                                                                                                                             |                       |                                                                                      |             |                                                                                                                              |  |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|------------|----------------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|--------------------------------------------------------------------------------------|-------------|------------------------------------------------------------------------------------------------------------------------------|--|
|                       |                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Body apron<br>Safety glass<br>ii) Health surveillance                                    |            |                |                   |                                                                                                                                             |                       |                                                                                      |             |                                                                                                                              |  |
|                       |                                                                                                                                             | Fertilizer applicator                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | i) PPE requirement:<br>3M 3477K N95 or 3M 9210 N95 respirator<br>Cotton/rubber glove     |            |                |                   |                                                                                                                                             |                       |                                                                                      |             |                                                                                                                              |  |
|                       |                                                                                                                                             | Water treatment operator (WTP) and Genset Operator                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | i) PPE requirement:<br>N95 respirator<br>Nitrile rubber<br>Body apron<br>Chemical goggle |            |                |                   |                                                                                                                                             |                       |                                                                                      |             |                                                                                                                              |  |
|                       |                                                                                                                                             | Re-assessment of CHRA for Pahang Oil Palm Estate 1 was conducted on 17/1/2017 by competent DOSH assessor, JKPP IH 127/171-2(08) for 6 specific work units. Report dated 10/2/17 was made available during assessment. Specific recommendation given by the assessor;                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                          |            |                |                   |                                                                                                                                             |                       |                                                                                      |             |                                                                                                                              |  |
|                       |                                                                                                                                             | <table border="1"> <thead> <tr> <th>Work Unit</th> <th>Recommendation</th> </tr> </thead> <tbody> <tr> <td>Pesticide handler</td> <td>               i) PPE requirement:<br/>               3M 3200 half face respirator with 3311K-55<br/>               Nitrile glove<br/>               Body apron<br/>               Safety glass<br/>               ii) Health surveillance             </td> </tr> <tr> <td>Fertilizer applicator</td> <td>               i) PPE requirement:<br/>               3M 3477K N95 or 3M 9210 N95 respirator<br/>               Cotton/rubber glove             </td> </tr> <tr> <td>Storekeeper</td> <td>               i) PPE requirement:<br/>               3M 3200 half face respirator with 3744K N95 filter<br/>               Nitrile rubber<br/>               Body apron<br/>               Chemical goggle             </td> </tr> </tbody> </table>           |                                                                                          | Work Unit  | Recommendation | Pesticide handler | i) PPE requirement:<br>3M 3200 half face respirator with 3311K-55<br>Nitrile glove<br>Body apron<br>Safety glass<br>ii) Health surveillance | Fertilizer applicator | i) PPE requirement:<br>3M 3477K N95 or 3M 9210 N95 respirator<br>Cotton/rubber glove | Storekeeper | i) PPE requirement:<br>3M 3200 half face respirator with 3744K N95 filter<br>Nitrile rubber<br>Body apron<br>Chemical goggle |  |
| Work Unit             | Recommendation                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                          |            |                |                   |                                                                                                                                             |                       |                                                                                      |             |                                                                                                                              |  |
| Pesticide handler     | i) PPE requirement:<br>3M 3200 half face respirator with 3311K-55<br>Nitrile glove<br>Body apron<br>Safety glass<br>ii) Health surveillance |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                          |            |                |                   |                                                                                                                                             |                       |                                                                                      |             |                                                                                                                              |  |
| Fertilizer applicator | i) PPE requirement:<br>3M 3477K N95 or 3M 9210 N95 respirator<br>Cotton/rubber glove                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                          |            |                |                   |                                                                                                                                             |                       |                                                                                      |             |                                                                                                                              |  |
| Storekeeper           | i) PPE requirement:<br>3M 3200 half face respirator with 3744K N95 filter<br>Nitrile rubber<br>Body apron<br>Chemical goggle                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                          |            |                |                   |                                                                                                                                             |                       |                                                                                      |             |                                                                                                                              |  |
|                       |                                                                                                                                             | <table border="1"> <tr> <td></td> <td></td> </tr> </table>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                          |            |                |                   |                                                                                                                                             |                       |                                                                                      |             |                                                                                                                              |  |
|                       |                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                          |            |                |                   |                                                                                                                                             |                       |                                                                                      |             |                                                                                                                              |  |
|                       |                                                                                                                                             | Procedures and actions was not effectively documented and implemented to address the identified ill health and occupational disease issues related to:<br>i) Group health and safety manual, edition 1 dated 13/2/07 only explained on the process flow for incident reporting. Process of medical removal protection was not detailed out in the procedure and only explained on reporting of occupational poisoning and disease<br>ii) HIRARC register for boiler operation did not mentioned specific control measures and PPE requirement for the operators working at high noise area. i.e Boiler area - hazard of high noise exposure, risk: hearing loss [noise monitoring – control measures, PPE: ear plug]<br>iii) Based on the latest audiometric report dated 10/8/17, there were 1 case of STS and 2 cases of hearing impairment recorded. No retest carried out within 3 month form the date |                                                                                          |            |                |                   |                                                                                                                                             |                       |                                                                                      |             |                                                                                                                              |  |

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| Criterion / Indicator | Assessment Findings                                                                                                                                                                                                                                                                                                                                                                                                      | Compliance                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|                       | <p>of testing and no further check carried out for the hearing impaired workers.</p> <p>Thus, a major NC was raised.</p>                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 4.7.3                 | <p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.</p> <p>- Minor compliance -</p> | <p>All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE. Suitable PPE has been provided to the workers based on the information in the MSDS/CSDS and CHRA assessor's recommendation.</p> <p>List of Personal Protective Equipment (PPE) Provided – identifies the type of PPE for the respective activities.</p> <ul style="list-style-type: none"> <li>i) Sterilizer and boiler/power operator – Safety Helmet, Leather Hand Glove, Cotton Gloves, Safety Shoes, Safety Vest and Ear Muff</li> <li>ii) Lab operator – Respirator (double cartridge) Nitrile Glove (chemical resistant), safety boots, Ear plug (NRR = 24 dB)</li> <li>iii) Field workers (sprayer, manurer &amp; harvester) – 3M 3200 half face respirator with 3311K-55, anti-mist goggles, wellington boots, apron and sickle cover.</li> </ul> |

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| Criterion / Indicator                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Assessment Findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Compliance      |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| <p>4.7.4</p> <p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.<br/>- Major compliance -</p>                                                                                                                                      | <p>OSH Committees meeting conducted quarterly and meeting minutes includes issues raised and action taken form workplace inspection report. The discussion on the accident review, workplace inspection, issues from workers, training has been discussed and action to be taken. There was no major issue. Minutes of meetings; #4:28/12/17, #3: 14/9/17 and #2: 14/6/17 available for review.</p> <p><u>Carotino Palm Oil Mill</u><br/>SHC organization chart for 2017/2018<br/>i) Chairman – Mill Manager<br/>ii) Secretary – Admin Officer</p> <p><u>Asia Oil Palm Estate</u><br/>SHC organization chart for 2017/2018, new committee member appointed.<br/>i) Chairman – Estate Manager, date of appointment, 29/12/17<br/>ii) Secretary – Estate Assistant, date of appointment, 3/1/18<br/>(#4:15/12/17, #3: 31/10/17, #2: 21/6/17, #1: 15/3/17)</p> <p><u>Pahang Oil Palm Estate 1</u><br/>SHC organization chart for 2017/2018<br/>i) Chairman – Estate Manager<br/>ii) Secretary – Estate Assistant<br/>(#4:19/12/17, #3: 10/10/17, #2: 18/7/17, #1:11/1/17)</p> <p>Workplace inspection was carried out prior to safety committee meeting. Verified monthly workplace inspection schedule and checklist used for the inspection. Result of inspection will be used as the inputs for the quarterly safety committee meeting.</p> | <p>Complied</p> |
| <p>4.7.5</p> <p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.<br/>- Minor compliance -</p> | <p>Accident and emergency procedures have been communicated to employees, contractors and visitors. Fire evacuation drill internal training was last conducted on 2/07/2017 (Caratino POM). Assigned operatives trained in first aid were present at visited work sites (engine room, workshop, production and biogas engine) and harvesting/spraying/manuring block. The sampled first aid equipment has been replenished and checked on monthly basis. All items were as per 4<sup>th</sup> schedule of Factory Machinery Act, Safety Health and Welfare Regulations 1970. No expired item found in the first aid box.</p> <p>Records on all accidents kept and summary sent to Head Office. Quarterly review on accident cases carried out during OSH quarterly meeting. All operating units keeping all the JKPP 6 &amp; 8 forms and available for viewing.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <p>Complied</p> |

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| Criterion / Indicator                                                                                                                                                                                                                   | Assessment Findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Compliance               |                          |                      |                          |                            |                        |                                              |                                    |                    |               |                      |                                                 |                |                    |               |                          |                                              |                 |          |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|----------------------|--------------------------|----------------------------|------------------------|----------------------------------------------|------------------------------------|--------------------|---------------|----------------------|-------------------------------------------------|----------------|--------------------|---------------|--------------------------|----------------------------------------------|-----------------|----------|
| 4.7.6<br>All workers shall be provided with medical care, and covered by accident insurance.<br>- Minor compliance -                                                                                                                    | Medical care and accident insurance is provided to all the employees. Local workers are covered under SOCSO scheme while foreign workers are covered under foreign workers compensation scheme. <table border="1" data-bbox="660 506 1289 1111"> <thead> <tr> <th>Insurance</th> <th>Period</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>SOCSO (47 workers)</td> <td>December 2017</td> <td rowspan="2">Carotino POM</td> </tr> <tr> <td>LONPAC Insurance Bhd (J/18/WF00/044992 /JHR)</td> <td>1/3/18-28/2/19</td> </tr> <tr> <td>SOCSO (17 workers)</td> <td>December 2017</td> <td rowspan="2">Asia Oil Palm Estate</td> </tr> <tr> <td>LONPAC Insurance Bhd (J/17/WF01/002976 /JHR-37)</td> <td>1/4/17-31/3/18</td> </tr> <tr> <td>SOCSO (34 workers)</td> <td>December 2017</td> <td rowspan="2">Pahang Oil Palm Estate 1</td> </tr> <tr> <td>LONPAC Insurance Bhd (J/17/BX22/029791/ JHR)</td> <td>20/7/17-19/1/19</td> </tr> </tbody> </table> | Insurance                | Period                   | Remark               | SOCSO (47 workers)       | December 2017              | Carotino POM           | LONPAC Insurance Bhd (J/18/WF00/044992 /JHR) | 1/3/18-28/2/19                     | SOCSO (17 workers) | December 2017 | Asia Oil Palm Estate | LONPAC Insurance Bhd (J/17/WF01/002976 /JHR-37) | 1/4/17-31/3/18 | SOCSO (34 workers) | December 2017 | Pahang Oil Palm Estate 1 | LONPAC Insurance Bhd (J/17/BX22/029791/ JHR) | 20/7/17-19/1/19 | Complied |
| Insurance                                                                                                                                                                                                                               | Period                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Remark                   |                          |                      |                          |                            |                        |                                              |                                    |                    |               |                      |                                                 |                |                    |               |                          |                                              |                 |          |
| SOCSO (47 workers)                                                                                                                                                                                                                      | December 2017                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Carotino POM             |                          |                      |                          |                            |                        |                                              |                                    |                    |               |                      |                                                 |                |                    |               |                          |                                              |                 |          |
| LONPAC Insurance Bhd (J/18/WF00/044992 /JHR)                                                                                                                                                                                            | 1/3/18-28/2/19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                          |                          |                      |                          |                            |                        |                                              |                                    |                    |               |                      |                                                 |                |                    |               |                          |                                              |                 |          |
| SOCSO (17 workers)                                                                                                                                                                                                                      | December 2017                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Asia Oil Palm Estate     |                          |                      |                          |                            |                        |                                              |                                    |                    |               |                      |                                                 |                |                    |               |                          |                                              |                 |          |
| LONPAC Insurance Bhd (J/17/WF01/002976 /JHR-37)                                                                                                                                                                                         | 1/4/17-31/3/18                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                          |                          |                      |                          |                            |                        |                                              |                                    |                    |               |                      |                                                 |                |                    |               |                          |                                              |                 |          |
| SOCSO (34 workers)                                                                                                                                                                                                                      | December 2017                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Pahang Oil Palm Estate 1 |                          |                      |                          |                            |                        |                                              |                                    |                    |               |                      |                                                 |                |                    |               |                          |                                              |                 |          |
| LONPAC Insurance Bhd (J/17/BX22/029791/ JHR)                                                                                                                                                                                            | 20/7/17-19/1/19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                          |                          |                      |                          |                            |                        |                                              |                                    |                    |               |                      |                                                 |                |                    |               |                          |                                              |                 |          |
| 4.7.7<br>Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics<br>- Minor compliance -                                                                                                                         | Records on Lost Time Accident (LTA) metrics was maintained and based on JKPP 6, 7 & 8. Sample of accident statistic as shown below : <table border="1" data-bbox="660 1232 1300 1384"> <thead> <tr> <th>Year</th> <th>Carotino POM</th> <th>Asia Oil Palm Estate</th> <th>Pahang Oil Palm Estate 1</th> </tr> </thead> <tbody> <tr> <td>2017</td> <td>0 case</td> <td>30 cases (0 LTI)</td> <td>28 cases (0 LTI)</td> </tr> <tr> <td>2018</td> <td>0 case</td> <td>0 case</td> <td>0 case</td> </tr> </tbody> </table> *LTA is equivalent to lost man days                                                                                                                                                                                                                                                                                                                                                                                                   | Year                     | Carotino POM             | Asia Oil Palm Estate | Pahang Oil Palm Estate 1 | 2017                       | 0 case                 | 30 cases (0 LTI)                             | 28 cases (0 LTI)                   | 2018               | 0 case        | 0 case               | 0 case                                          | Complied       |                    |               |                          |                                              |                 |          |
| Year                                                                                                                                                                                                                                    | Carotino POM                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Asia Oil Palm Estate     | Pahang Oil Palm Estate 1 |                      |                          |                            |                        |                                              |                                    |                    |               |                      |                                                 |                |                    |               |                          |                                              |                 |          |
| 2017                                                                                                                                                                                                                                    | 0 case                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 30 cases (0 LTI)         | 28 cases (0 LTI)         |                      |                          |                            |                        |                                              |                                    |                    |               |                      |                                                 |                |                    |               |                          |                                              |                 |          |
| 2018                                                                                                                                                                                                                                    | 0 case                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 0 case                   | 0 case                   |                      |                          |                            |                        |                                              |                                    |                    |               |                      |                                                 |                |                    |               |                          |                                              |                 |          |
| <b>Criterion 4.8:</b><br>All staff, workers, smallholders and contract workers are appropriately trained.                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                          |                          |                      |                          |                            |                        |                                              |                                    |                    |               |                      |                                                 |                |                    |               |                          |                                              |                 |          |
| 4.8.1<br>A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme.<br>- Major compliance - | Training Schedule/Programme for 2017/2018 has been established. This programme covers all aspects of the RSPO Principles and Criteria based on the assessment of training need via performance appraisal, new technologies or if there is any change of company policies and procedures.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Complied                 |                          |                      |                          |                            |                        |                                              |                                    |                    |               |                      |                                                 |                |                    |               |                          |                                              |                 |          |
| 4.8.2<br>Records of training for each employee shall be maintained.<br>- Minor compliance -                                                                                                                                             | Records of training for each employee was maintained at all visited operating units. Sample of training carried out in 2017 and 2018 were: <table border="1" data-bbox="660 1798 1289 1993"> <thead> <tr> <th>Date</th> <th>Training</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>21/8/18</td> <td>SOP Training – Weighbridge</td> <td rowspan="2">Carotino Palm Oil Mill</td> </tr> <tr> <td>27/12/17</td> <td>SOP Training – Vertical Fertilizer</td> </tr> </tbody> </table>                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Date                     | Training                 | Remarks              | 21/8/18                  | SOP Training – Weighbridge | Carotino Palm Oil Mill | 27/12/17                                     | SOP Training – Vertical Fertilizer | Complied           |               |                      |                                                 |                |                    |               |                          |                                              |                 |          |
| Date                                                                                                                                                                                                                                    | Training                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Remarks                  |                          |                      |                          |                            |                        |                                              |                                    |                    |               |                      |                                                 |                |                    |               |                          |                                              |                 |          |
| 21/8/18                                                                                                                                                                                                                                 | SOP Training – Weighbridge                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Carotino Palm Oil Mill   |                          |                      |                          |                            |                        |                                              |                                    |                    |               |                      |                                                 |                |                    |               |                          |                                              |                 |          |
| 27/12/17                                                                                                                                                                                                                                | SOP Training – Vertical Fertilizer                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                          |                          |                      |                          |                            |                        |                                              |                                    |                    |               |                      |                                                 |                |                    |               |                          |                                              |                 |          |

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| Criterion / Indicator |  | Assessment Findings |                                                                                             |                          | Compliance |
|-----------------------|--|---------------------|---------------------------------------------------------------------------------------------|--------------------------|------------|
|                       |  | 21/12/17            | SOP Training – Extraction/clarification , Kernel Plant/Nut Plant, Unstripped Bunch training |                          |            |
|                       |  | 18/1/18             | Confined space training                                                                     |                          |            |
|                       |  | 5/2/17              | First Aid Training                                                                          |                          |            |
|                       |  | 30/1/17             | Safe Tractor Driver Training                                                                | Pahang Oil Palm Estate 1 |            |
|                       |  | 28/1/18             | Fire Drill Training                                                                         |                          |            |
|                       |  | 18/7/17             | Fogging Training                                                                            |                          |            |
|                       |  | 7/8/17              | Harvesting Safety Training                                                                  | Asia Oil Palm Estate     |            |
|                       |  | 18/10/17            | Integrated Pest Management (IPM) Training                                                   |                          |            |
|                       |  | 25/10/17            | Chemical Mixing/Triple Rinse Training                                                       |                          |            |
|                       |  | 19/12/17            | Manuring Training                                                                           |                          |            |
|                       |  | 7/12/17             | High Conservation Value Training                                                            |                          |            |
|                       |  | 6/12/17             | Scheduled Waste Training                                                                    |                          |            |

**Principle 5: Environmental responsibility and conservation of natural resources and biodiversity**

**Criterion 5.1:**

Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.

|       |                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                 |          |
|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|
| 5.1.1 | An environmental impact assessment (EIA) shall be documented.<br>- Major compliance -                                                                                                                                                                                                                          | 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.                                                                         | Complied |
| 5.1.2 | Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons.<br>- Minor compliance - | The continuous implementation of the improvements activities were checked during the field and document audit. The environmental management plan has been established to monitor the identified significant activities that give impacts on environment. A specific staff and executive have been appointed to do the monitoring to ensure the plan is effectively implemented. | Complied |

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|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5.1.3                                                                                                                                                                                                                                                                                                                                  | <p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p> <p>- Minor compliance -</p> | <p>An environmental improvement plan was implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring protocol, which is adaptive to operational changes and is reviewed every year to reflect the results of monitoring operational changes that may have positive and negative environmental impacts. Continuous awareness training programme has been carried out by the company to its workers and other stakeholders.</p> <p>Complied</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <p><b>Criterion 5.2:</b><br/>The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.</p> |                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 5.2.1                                                                                                                                                                                                                                                                                                                                  | <p>Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).</p> <p>- Major compliance -</p>                                                                                                                                                                  | <p>A final 'A conservation assessment of Carotino's Peninsular Malaysian Estates – Conservation values and recommendations' dated 22 January 2008 by WildAsia is made available. The report identifies habitat areas of significance within the estates and makes recommendations for their conservation. This includes a timetable for implementation of riverine buffers and suggests support for the conservation of lowland forest and karsts areas surrounding the estates. The report also includes estate level map identifying conservation area within each estate is available. HCV identification and management plan, doc ref# C/015-06/2016 revised date 5/9/16 has been established and reviewed on yearly basis to manage and enhance the conservation areas within the estates (e.g. physical boundary for estate is proper marked and identified). Any activities that involved loss of ecological and biodiversity landscape need to be communicated with the relevant @ peripheral stakeholders (forest department, logging concessionaires, mining operators and smallholders).</p> <p>Complied</p> |
| 5.2.2                                                                                                                                                                                                                                                                                                                                  | <p>Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan.</p> <p>- Major compliance -</p>                                                                                                                       | <p>Regular patrols within the estates were carried out and findings recorded by the field supervisors in order to monitor the conservation/buffer zone areas. Mechanism for reporting the sightings of various types of wildlife, were found to have been in place. Monitoring and control of any illegal hunting, fishing or collecting activities was also implemented.</p> <p>Complied</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 5.2.3                                                                                                                                                                                                                                                                                                                                  | <p>There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species.</p> <p>- Minor compliance -</p>                                                    | <p>Evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities were maintained and implemented. Signage was utilised as part of creating awareness among employees on the restriction of capturing/harming/collecting/killing the RTE species.</p> <p>Complied</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |



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| Criterion / Indicator                                                                                                                                                                                                                                                                                            | Assessment Findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Compliance |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| 5.2.4<br>Where a management plan has been created there shall be ongoing monitoring:<br>• The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported;<br>• Outcomes of monitoring shall be fed back into the management plan.<br>- Minor compliance - | The HCV management plan which was documented as HCV improvement plan has been reviewed on yearly basis where the plan includes monitoring of buffer zone area and conservation area in the estate and surrounding area. Regular patrolling by estate security personnel (to check for encroachment, animal sightings).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Complied   |
| 5.2.5<br>Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights.<br>- Minor compliance -                                                                                | No HCV set asides with existing rights of local communities have been identified.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Complied   |
| <b>Criterion 5.3:</b><br>Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |            |
| 5.3.1<br>All waste products and sources of pollution shall be identified and documented.<br>- Major compliance -                                                                                                                                                                                                 | Visits made to Mill together with estates showed that all waste products and sources of pollution were identified and documented as per the Waste and Waste Products Identification and Disposal Plan, F/007-06/2016 The documentation and identification of all the waste products such as scheduled waste, domestic waste and recyclable waste such as metal, plastic, mill waste and polluting materials e.g. used lubricants, boiler ash and empty fruit bunches were maintained and monitored at the Mill. Scheduled Waste identified included spent hydraulic oil (SW 305), used filters SW 410 and empty container (SW409). Refer to 2 <sup>nd</sup> schedule, notification no. 20170207112RQAOU. No new notification to DOE for new waste. Records on the usage and disposal were well recorded and documented. | Complied   |
| 5.3.2<br>All chemicals and their containers shall be disposed of responsibly.<br>- Major compliance -                                                                                                                                                                                                            | Used containers meant for reuse were separately stored and monitored by the respective Office Store personnel. All excess used chemical containers were punctured as per DOE guidelines and disposed of by appointed Estate contractors such as G-Planters Sdn. Bhd and Indah Agri Bio.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Complied   |
| 5.3.3<br>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.<br>- Minor compliance -                                                                                                                                                                          | <u>Mill &amp; Estates</u><br>There is a waste management plan in place as per the Waste and Waste Products Identification and Disposal Plan for Estates and Mills, Doc. Ref. No. F/007-04/2015. Operational waste separated from schedule waste and recyclable waste (EFB, Shell, Fiber).<br><br><u>Carotino POM</u><br>Inventory of Scheduled Wastes for SW 305, SW 409 and SW410 under 5 <sup>th</sup> schedule, ref# 0604C118225122018 dated 5/2/18.<br><br>For SW 305, SW410 and SW 409 the last disposal was made on 4/2/18. CN# 20180205517LD925U (SW410), CN# 2018020517B4PQV8 (SW305), CN# 2018020516ZLCNWK (SW409)                                                                                                                                                                                             | Complied   |

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|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|---------|------------|------|---------------|---------------|------|---------------|---------------|----------|
|                                                                                                                                                                                        | Appropriate secondary containment for the diesel skid tanks, chemical and scheduled waste storage areas was verified to be maintained. No bund breaks or leaks which can leads to pollution. Checked at monsoon discharge point oil trap, no evidence of oil overflowing to the nearby waterways. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |          |         |            |      |               |               |      |               |               |          |
| <b>Criterion 5.4:</b><br>Efficiency of fossil fuel use and the use of renewable energy is optimised.                                                                                   |                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |          |         |            |      |               |               |      |               |               |          |
| 5.4.1                                                                                                                                                                                  | A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored.<br>- Minor compliance -                                                                                                                                              | Renewable energy plan has been reviewed annually. Last review was done on 2/1/17. The plan incorporated the reduction of diesel usage, usage of fibre and shell, utilization of RE (turbine and gas engine). Summary of electricity generation as per below table: <table border="1" data-bbox="662 797 1299 891"> <thead> <tr> <th>Year</th> <th>Turbine</th> <th>Gas Engine</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>2,281,362 kWh</td> <td>1,220,242 kWh</td> </tr> <tr> <td>2016</td> <td>1,894,356 kWh</td> <td>2,169,157 kWh</td> </tr> </tbody> </table> Summary of diesel consumption for 2 consecutive years as follows:<br>FY 15/16 : 1.98 liter per CPO<br>FY 16/17 to-date : 2.33 litre per CPO | Year     | Turbine | Gas Engine | 2015 | 2,281,362 kWh | 1,220,242 kWh | 2016 | 1,894,356 kWh | 2,169,157 kWh | Complied |
| Year                                                                                                                                                                                   | Turbine                                                                                                                                                                                                                                                                                           | Gas Engine                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |          |         |            |      |               |               |      |               |               |          |
| 2015                                                                                                                                                                                   | 2,281,362 kWh                                                                                                                                                                                                                                                                                     | 1,220,242 kWh                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |          |         |            |      |               |               |      |               |               |          |
| 2016                                                                                                                                                                                   | 1,894,356 kWh                                                                                                                                                                                                                                                                                     | 2,169,157 kWh                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |          |         |            |      |               |               |      |               |               |          |
| <b>Criterion 5.5:</b><br>Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice. |                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |          |         |            |      |               |               |      |               |               |          |
| 5.5.1                                                                                                                                                                                  | There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.<br>- Major compliance -                                            | Under the Group Policy, using fire for land preparation is not allowed. Based on site visit, no trace of open burning was observed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Complied |         |            |      |               |               |      |               |               |          |
| 5.5.2                                                                                                                                                                                  | Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.<br>- Minor compliance -  | Fire was not used for preparing land for replanting at the estate.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Complied |         |            |      |               |               |      |               |               |          |
| <b>Criterion 5.6:</b><br>Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.                                                |                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |          |         |            |      |               |               |      |               |               |          |
| 5.6.1                                                                                                                                                                                  | An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4).<br>- Major compliance -                                                                                                                   | The Mill and estates had reviewed the environmental impact assessment on potential pollution to water, gaseous emissions to air and contamination on land. Monitoring of mill gas emissions is being done online using the Continuous Emissions Monitoring System (CEMS) and supported by the Ringelman Smoke Chart. POME treatment, monitoring and land application is monitored, maintained and adhered to DOE regulations.<br><br>Result of stack sampling for boiler no.2 as per below:<br>1 <sup>st</sup> half : 29/5/17 – 0.353 g/Nm <sup>3</sup> at 12% CO <sub>2</sub>                                                                                                                                        | Complied |         |            |      |               |               |      |               |               |          |

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| Criterion / Indicator                                                                                                                                                                                                                                                                                                 | Assessment Findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Compliance            |        |       |                   |                        |                       |     |                        |                       |     |                       |                       |  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|--------|-------|-------------------|------------------------|-----------------------|-----|------------------------|-----------------------|-----|-----------------------|-----------------------|--|
|                                                                                                                                                                                                                                                                                                                       | <p>2<sup>nd</sup> half : 11/12/17 – 0.340 g/Nm<sup>3</sup> at 12% CO<sub>2</sub></p> <p>Boiler no.3<br/>1<sup>st</sup> half : 17/7/17 by Env Consultancy and Monitoring Services, report# ISCV/CFES/CAROTINO/STACK</p> <table border="1" data-bbox="659 562 1235 714"> <thead> <tr> <th>Parameter</th> <th>Result</th> <th>Limit</th> </tr> </thead> <tbody> <tr> <td>Particulate count</td> <td>35.2 mg/m<sup>3</sup></td> <td>150 mg/m<sup>3</sup></td> </tr> <tr> <td>NOx</td> <td>71.6 mg/m<sup>3</sup></td> <td>400 mg/m<sup>3</sup></td> </tr> <tr> <td>SOx</td> <td>7.9 mg/m<sup>3</sup></td> <td>400 mg/m<sup>3</sup></td> </tr> </tbody> </table> | Parameter             | Result | Limit | Particulate count | 35.2 mg/m <sup>3</sup> | 150 mg/m <sup>3</sup> | NOx | 71.6 mg/m <sup>3</sup> | 400 mg/m <sup>3</sup> | SOx | 7.9 mg/m <sup>3</sup> | 400 mg/m <sup>3</sup> |  |
| Parameter                                                                                                                                                                                                                                                                                                             | Result                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Limit                 |        |       |                   |                        |                       |     |                        |                       |     |                       |                       |  |
| Particulate count                                                                                                                                                                                                                                                                                                     | 35.2 mg/m <sup>3</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 150 mg/m <sup>3</sup> |        |       |                   |                        |                       |     |                        |                       |     |                       |                       |  |
| NOx                                                                                                                                                                                                                                                                                                                   | 71.6 mg/m <sup>3</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 400 mg/m <sup>3</sup> |        |       |                   |                        |                       |     |                        |                       |     |                       |                       |  |
| SOx                                                                                                                                                                                                                                                                                                                   | 7.9 mg/m <sup>3</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 400 mg/m <sup>3</sup> |        |       |                   |                        |                       |     |                        |                       |     |                       |                       |  |
| 5.6.2                                                                                                                                                                                                                                                                                                                 | <p>Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented.<br/>- Major compliance</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Complied              |        |       |                   |                        |                       |     |                        |                       |     |                       |                       |  |
| 5.6.3                                                                                                                                                                                                                                                                                                                 | <p>A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools.<br/>- Minor compliance -</p>                                                                                                                                                                                                                                                                                                                                                                                                                                         | Complied              |        |       |                   |                        |                       |     |                        |                       |     |                       |                       |  |
| <p><b>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.</b></p>                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                       |        |       |                   |                        |                       |     |                        |                       |     |                       |                       |  |
| <p><b>Criterion 6.1:</b><br/>Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                       |        |       |                   |                        |                       |     |                        |                       |     |                       |                       |  |
| 6.1.1                                                                                                                                                                                                                                                                                                                 | <p>A social impact assessment (SIA) including records of meetings shall be documented.<br/>- Major compliance -</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Complied              |        |       |                   |                        |                       |     |                        |                       |     |                       |                       |  |
| 6.1.2                                                                                                                                                                                                                                                                                                                 | <p>There shall be evidence that the assessment has been done with the participation of affected parties.<br/>- Major compliance -</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Complied              |        |       |                   |                        |                       |     |                        |                       |     |                       |                       |  |

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| 6.1.3                                                                                                                                                                                          | Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.<br>- Major compliance -         | Annually, each of the estate and mill will review the Environmental and Social Improvement Plan following the meeting/ discussion/ visit with internal and external stakeholder i.e. meeting minutes, visit record and workers survey. It was noted that the Environmental and Social Improvement Plan has been updated on 12/9/2017 for the visiting site of CPOM, 15/9/2017 for Asia Estate and Pahang Estate. The new action plan were having the section for Environmental and Social Plan.                                                              | Complied       |
| 6.1.4                                                                                                                                                                                          | The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties.<br>- Minor compliance - | Starting 2017, the action plan for SEIA will be reviewed for every 2 years and each of the estate and mill will review the Environmental and Social Improvement Plan following the meeting/ discussion/visit with internal and external stakeholder i.e. meeting minutes, visit record and workers survey. It was noted that the Environmental and Social Improvement Plan has been updated on the month of September for the visiting site of CPOM, Asia and Pahang Estate.                                                                                 | Complied       |
| 6.1.5                                                                                                                                                                                          | Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme).<br>- Minor compliance -                                                                                                                                                         | Not applicable.<br><br>No smallholder schemes in the certification unit.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Not applicable |
| <b>Criterion 6.2:</b><br>There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties. |                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                |
| 6.2.1                                                                                                                                                                                          | Consultation and communication procedures shall be documented.<br>- Major compliance -                                                                                                                                                                                                                  | JC Chang Group has established SOP on Mechanism for Communication and Consultation with Doc. Ref. No. E/004/07-2015 dated 8/9/2015. There are three methods of communication such as below: <ul style="list-style-type: none"> <li>• Consultative with employees and others stakeholders</li> <li>• Gender group (female) consultation</li> <li>• Free prior informed consent</li> </ul> Mechanisms of the communication such as Joint Consultative Committee (JCC), Complaints and Grievance Procedure and suggestion box are available outside the office. | Complied       |
| 6.2.2                                                                                                                                                                                          | A management official responsible for these issues shall be nominated.<br>- Minor compliance -                                                                                                                                                                                                          | Admin officer- Ms Norzilawati in Carotino POM, Senior Assistant Manager- Mr Ramasamy S/O Palaniyandy in Asia Estate and Ms G. Saravanan (Assistant Manager) have been nominated as the person responsible for issues such as stakeholder request, complaints & grievances.<br>The notice of appointed persons was displayed at the notice board outside the mill office.                                                                                                                                                                                     | Complied       |
| 6.2.3                                                                                                                                                                                          | A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained.                                                | Carotino POM has developed a stakeholder list which last reviewed on 01/02/2017 and Asia & Pahang Estate is having the stakeholder updated list as at January 2018. The list included FFB suppliers, sister estates, suppliers, NGOs, contractors, government authorities and local communities. There is stakeholder meeting conducted on 13.04.17 and 18.05.17 attended by internal, external stakeholders with the participation of estates and regional controller. Actions                                                                              | Complied       |

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|                                                                                                                                                                                                                                                                                                          | - Minor compliance -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | have been taken to resolve the issues raised during the meeting especially when there is issue arise.                                                                                                                                                                                                                                                                                                                                                                                                        |            |
| <b>Criterion 6.3:</b><br>There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |            |
| 6.3.1                                                                                                                                                                                                                                                                                                    | The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested.<br>- Major compliance -                                                                                                                                                                                                                                                                                                                            | JC Chang Group has developed a SOP on Mechanism for Complaints and Grievances with Doc. Ref. No. E/001-06/2017 dated 06/1/2017. The procedure has documented what type of matters that could and could not be consider as grievances, general requirements, and procedures of complaint lodged by the affected person with timeframe to handle the issues which divided into four levels, records of grievance and corrective actions. Total number of working days for a grievance to be processed 27 days. | Complied   |
| 6.3.2                                                                                                                                                                                                                                                                                                    | Documentation of both the process by which a dispute was resolved and the outcome shall be available.<br>- Major compliance -                                                                                                                                                                                                                                                                                                                                                                                                               | Most of the complaints were related to house repair work such as broken fan or door in Carotino POM. In Asia Estate and Pahang Estate, there were complaints regarding broken lights, poor road condition, leaked tanks and broken wires. The complaints sighted for The management has taken action to rectify the problems. The complainants have acknowledged after the problems been rectified.                                                                                                          | Complied   |
| <b>Criterion 6.4:</b><br>Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |            |
| 6.4.1                                                                                                                                                                                                                                                                                                    | A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place.<br>- Major compliance -                                                                                                                                                                                                                                                                                                                                                                    | JC Chang Group has developed a SOP for Identifying Legal and Customary Rights and Identifying People Entitled to Compensation with Doc. Ref. No. E/002-04/2017 dated 28/12/2017. The procedure has detailing the procedure on how to identify the legal and customary rights, procedure on calculating and distributing fair compensation as well as documentation of the outcome of compensation.                                                                                                           | Complied   |
| 6.4.2                                                                                                                                                                                                                                                                                                    | A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land.<br>- Minor compliance - | SOP as per criterion 6.4.1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Complied   |

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| 6.4.3                                                                                                                                                                                          | The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available.<br>- Major compliance - | No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Complied |
| <b>Criterion 6.5:</b><br>Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages. |                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |          |
| 6.5.1                                                                                                                                                                                          | Documentation of pay and conditions shall be available.<br>- Major compliance -                                                                                                                                | Mill and estates have employed local and foreign workers. All the workers are under direct employment. Sampled payslip for Jun'17, Nov'17 and Jan'18 as below:<br><br>Carotino POM: <ul style="list-style-type: none"> <li>a. Employee ID: G0289 (CPOM)</li> <li>b. Employee ID: G0290 (CPOM)</li> <li>c. Employee ID: G0304 (CPOM)</li> <li>d. Employee ID: G0139 (CPOM)</li> <li>e. Employee ID: G0131 (CPOM)</li> <li>f. Employee ID: G0003 (CPOM)</li> <li>g. Employee ID: AOP1233 (AOP)</li> <li>h. Employee ID: AOP1263 (AOP)</li> <li>i. Employee ID: AOP 1374 (AOP)</li> <li>j. Employee ID: AOP1053 (AOP)</li> <li>k. Employee ID: POP1981 (POP)</li> <li>l. Employee ID: POP7004 (POP)</li> <li>m. Employee ID: POP2296 (POP)</li> <li>n. Employee ID: PE100035 (POP)</li> <li>o. Employee ID: PE100101 (POP)</li> </ul> All the sampled workers were achieved the minimum wage accordance to Minimum Wage Order 2016 which achieved RM 1000/ month or RM 38.50/ day. | Complied |

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| <p>6.5.2</p> <p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p>- Major compliance -</p> | <p>Employment contract are available in language that understood by workers. The contract has detailing the payments and employment conditions such as period of working, working hour, medical assistance, housing, holiday and annual leave and period of notice. The contract was signed by the workers and sampled contracts as below:</p> <p>Carotino POM:</p> <ul style="list-style-type: none"> <li>a. Employee ID: G0289 (CPOM)</li> <li>b. Employee ID: G0290 (CPOM)</li> <li>c. Employee ID: G0304 (CPOM)</li> <li>d. Employee ID: G0139 (CPOM)</li> <li>e. Employee ID: G0131 (CPOM)</li> <li>f. Employee ID: G0003 (CPOM)</li> <li>g. Employee ID: AOP1233 (AOP)</li> <li>h. Employee ID: AOP1263 (AOP)</li> <li>i. Employee ID: AOP 1374 (AOP)</li> <li>j. Employee ID: AOP1053 (AOP)</li> <li>k. Employee ID: POP1981 (POP)</li> <li>l. Employee ID: POP7004 (POP)</li> <li>m. Employee ID: POP2296 (POP)</li> <li>n. Employee ID: PE100035 (POP)</li> <li>o. Employee ID: PE100101 (POP)</li> </ul> <p>Extension contract for the workers were sampled and the contracts were valid as below:</p> <ul style="list-style-type: none"> <li>p. Employee ID: G0131, contract extended from 09.07.2014 until the service terminated.</li> <li>q. Employee ID: G0139, contract extended from 18.10.2014 until the service terminated.</li> <li>r. Employee ID: AOP1233 contract extended from 01.01.2013 until the service terminated.</li> <li>s. Employee ID: AOP1263 contract extended from 29.09.2012 until the service terminated.</li> <li>t. Employee ID: AOP1053 contract extended from 01.01.2013 until the service terminated.</li> <li>u. Employee ID: POP2296 contract extended from 10.04.2013 until the service terminated.</li> <li>v. Employee ID: PE100035 contract extended from 28.07.2014 until the service terminated.</li> </ul> <p>All the workers who joined before the enforcement of new Minimum Wage Order 2016 had signed on detail of changes on terms and conditions of employment. The appendix has detailing the new daily and monthly rate.</p> | <p>Complied</p> |

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|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
|                                                                                                                                                                                                                                                                                                                                                                                | <p>The workers were provided with housing, free water and electricity supply, medical and education assistance such as school bus in Carotino POM, Asia Estate and Pahang Estate. This is evident as per employment contract and line site visit.</p> <p>In Carotino POM and estates' line-site has been inspected on weekly basis by EHA and the Line Site Report Book by EHA was sighted.</p> <p>Other than that, the electricity is provide through gen-set and the water treated. Seen the water treatment analysis result-drinking water analysis which was conducted annually. The Laboratory is Dre Ameroid (M) Sdn Bhd on 18.12.17, E-Coli is absent and total Coliform is 6 (max: &lt;10) for CPOM and Pahang Estate (linesite is adjacent to each other and the water supplier is same which is from the CPOM) and Permulab Sdn Bhd for Asia Estate, as at 23.11.2017, there were absent of total coliform and e-coli.</p> |            |
| 6.5.3                                                                                                                                                                                                                                                                                                                                                                          | <p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.<br/>- Minor compliance –</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Complied   |
| 6.5.4                                                                                                                                                                                                                                                                                                                                                                          | <p>Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food.<br/>- Minor compliance –</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Complied   |
| <p><b>Criterion 6.6:</b><br/>The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |            |
| 6.6.1                                                                                                                                                                                                                                                                                                                                                                          | <p>A published statement in local languages recognising freedom of association shall be available.<br/>- Major compliance -</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Complied   |
| 6.6.2                                                                                                                                                                                                                                                                                                                                                                          | <p>Minutes of meetings with main trade unions or workers representatives shall be documented.<br/>- Minor compliance -</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Complied   |



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|                                                                                                                                                                                                              | Pahang Estate. Meeting minutes is sighted and actions have been taken to resolve the issues raised by the workers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |            |
| <b>Criterion 6.7:</b><br>Children are not employed or exploited.                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |            |
| 6.7.1                                                                                                                                                                                                        | There shall be documentary evidence that minimum age requirements are met.<br>- Major compliance -<br><br>J.C. Chang Group has established Social and Human Rights Policy dated 1/9/2016 signed by the Mill Director. The policy has a statement where the management will not employ minor who is under 18 years old. The policy was displayed at the notice board outside the office. The policy has been briefed to the employees on 20-21/01/17 for Carotino POM, 31/01/2018 for Asia Estate and in Pahang Estate was on 29/01/2018. Attendant list was sighted. Document reviewed of the workers' list in mill and estate found that the management did not employ workers less than 18 years old.                                                                                              | Complied   |
| <b>Criterion 6.8:</b><br>Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |            |
| 6.8.1                                                                                                                                                                                                        | A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented.<br>- Major compliance -<br><br>JC Chang Group has established Equal Opportunities Policy dated 1/7/2012 signed by the Mill Director. All the employees with calibre will be given equal opportunities to participate in relevant development programmes. The policy was displayed at the notice board outside the office.<br><br>In Carotino POM the policy has been briefed to the employees on 04/11/2017 to 9 attendees, in Asia Estate the training was conducted on 12/09/2017 (3 attendees) and 04/11/2017 (1 attendee) and in Pahang Estate on 01/03/2017, 15/06/2017, 01/07/2017 and 08/09/2017. Attendant list with photos were sighted. | Complied   |
| 6.8.2                                                                                                                                                                                                        | Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against.<br>- Major compliance -<br><br>The management is committed to ensure that the workplace is free from discrimination or any forms of discriminatory harassment. They treated all the employees equally irrespective of sex, marital status, age, race, national origin, religion and political beliefs. The management has recruited female and male workers.<br><br>It was also confirmed through interview the workers from mill and estates.                                                                                                                                                                                                     | Complied   |
| 6.8.3                                                                                                                                                                                                        | It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available.<br>- Minor compliance -<br><br>The management recruited the employees based on skills, experiences and attitude of the employees is appropriate to the positions offered. The management will provide development programme to those who are competent and capable without any discrimination or prejudice.<br><br>It was also confirmed through interview the workers from mill and estates and verified their individual workers files (contract, increments and training records).                                                                                                                                  | Complied   |
| <b>Criterion 6.9:</b><br>There is no harassment or abuse in the work place, and reproductive rights are protected.                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |            |

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| 6.9.1<br>Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce.<br>- Major compliance -                                                                       | <p>JC Chang Group has established Sexual Harassment Policy dated 1/7/2012 signed by the Mill Director. The policy is to promote a workplace that is free of sexual harassment. The policy was displayed at the notice board outside the office. The policy has been briefed to the employees on 15/12/2017 in Asia Estate and in Pahang Estate on 01/03/2017, 15/06/2017, 01/07/2017 and 08/09/2017. Attendant list was sighted (17 attendees).</p> <p>Six monthly of the gender committee meeting will emphasize on the policy and process for lodging complaint for sexual harassment.</p>                                                                                                                                                                                                                                                                       | Complied       |
| 6.9.2<br>A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce.<br>- Major compliance -                                                                      | <p>JC Chang Group has established Policy of Reproductive Rights with Doc. Ref. No. E/015-01/2015 dated 8/9/2015.</p> <p>The management respects the rights of reproductive as part of human rights. The policy was displayed at the notice board outside the office. The policy has been briefed to the employees on 22/12/2016 through Gender Committee meeting (Carotino POM), 12/09/2017 &amp; 04/11/2017 (Asia Estate), and in Pahang Estate on 01/03/2017, 15/06/2017, 01/07/2017 and 08/09/2017. Attendant list with photos were sighted.</p>                                                                                                                                                                                                                                                                                                                | Complied       |
| 6.9.3<br>A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce.<br>- Minor compliance -                               | <p>The managements have established a Gender Committee which consists of employer's representatives, employee's representatives and dependent's representatives. Meeting was conducted on 20/12/2017 and 06/06/2017 for Carotino POM, 15/02/2017 and 10/08/2017 for Asia Estate and 13/02/2017 and 19/07/2017 for Pahang Estate.</p> <p>The meeting was conducted at least twice per year.</p> <p>Meeting minutes and attendant lists were sighted. Issues raised during the meeting were resolved and no pending issues. There is no any sexual harassment case reported through interview and document review.</p> <p>SOP on mechanism for the prevention and eradication of sexual harassment and violence in the workplace (E/003-01/2008) dated 1 Oct 2008 was established as the mechanisms to prevent and eradicate sexual harassment in the workplace.</p> | Complied       |
| <p><b>Criterion 6.10:</b><br/> <b>Growers and mills deal fairly and transparently with smallholders and other local businesses.</b></p>                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                |
| 6.10.1<br>Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available.<br>- Minor compliance -                                                                                                                            | <p>Not applicable as the management unit did not has any business dealing with smallholder.</p> <p>However, the mill has displayed the FFB pricing of daily at the weighbridge area. The pricing was displayed in front of the weighbridge counter.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Complied       |
| 6.10.2<br>Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation).<br>- Major compliance - | Not applicable.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Not applicable |

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| Criterion / Indicator                                                                                        | Assessment Findings                                                                                                                                                             | Compliance                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                |
|--------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| 6.10.3                                                                                                       | Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.<br>- Minor compliance - | Sampled one of the Transportation Agreement between Carotino Sdn Bhd (Carotino Palm Oil Mill) and Hup Shing Berjaya Enterprise (Contract No: CSB/S4(POM)/36/NKW) dated 03/12/2015 valid until 30/11/2018. The contract agreement has stated the revised CPO transport rate with the Transportation Agreement.<br>Through interviewed with the FFB transporter confirmed that no any late payment or grievance related to payment reported.                                                                                                                                         | Complied       |
| 6.10.4                                                                                                       | Agreed payments shall be made in a timely manner.<br>- Minor compliance -                                                                                                       | Sampled on the following invoice no: HS00044 dated 31 Jan 2018.<br><br>Through interviewed with the FFB transporter confirmed that no any late payment or grievance related to payment reported.                                                                                                                                                                                                                                                                                                                                                                                   | Complied       |
| <b>Criterion 6.11:</b><br>Growers and millers contribute to local sustainable development where appropriate. |                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                |
| 6.11.1                                                                                                       | Contributions to local development that are based on the results of consultation with local communities shall be demonstrated.<br>- Minor compliance –                          | Contributions are regularly made to school activities and community activities. Donation has been contributed to local community such as:<br>Carotino POM:<br>a. Contribution of school transportation for Nov'16, Jan'17, Feb'17, Mar'17, Apr'17, May'17-Oct'17-Morning & Afternoon Session<br>b. Sumbangan Program CSR Ramadhan 2017 on 07.06.17<br><br>Asia Estate:<br>a. Annual Kenduri on 31.05.2017.<br>b. Education Aid-Shinega A/P Vejaya on 15.02.2017<br>Pahang Estate:<br>a. Education Aid on 06.01.2017<br>b. Worker Welfare-Donations to Labour Welfare on 01.07.2017 | Complied       |
| 6.11.2                                                                                                       | Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity.<br>- Minor compliance –     | Not applicable. No scheme smallholders within the production unit.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Not applicable |
| <b>Criterion 6.12:</b><br>No forms of forced or trafficked labour are used.                                  |                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                |
| 6.12.1                                                                                                       | There shall be evidence that no forms of forced or trafficked labour are used.<br>- Major compliance -                                                                          | JC Chang Group has established Social and Human Rights Policy dated 1/9/2016 signed by the Mill Director. The policy has a statement where the management will not practice forced or trafficked labour. The policy was displayed at the notice board outside the office. The policy has been briefed to the employees on 20-21/01/17 for Carotino POM, 31/01/18 for Asia Estate and in Pahang Estate was on 29/01/2018.<br><br>Attendant list was sighted. The workers have signed on a consent letter to tender the passport voluntarily to the management for safety issue.     | Complied       |
| 6.12.2                                                                                                       | Where applicable, it shall be demonstrated that no contract substitution has occurred.<br>- Minor compliance –                                                                  | No contract of substitution is sighted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Not applicable |

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| Criterion / Indicator                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Assessment Findings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Compliance     |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| 6.12.3                                                                                                                                                                                                                                         | Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented.<br>- Major compliance -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Social and Human Rights Policy is implemented. All the workers were treated equally and no discrimination occurred. Carotino and supply bases unit did not employed temporary workers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Complied       |
| <b>Criterion 6.13:</b><br>Growers and millers respect human rights.                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                |
| 6.13.1                                                                                                                                                                                                                                         | A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1).<br>- Major compliance -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | J.C. Chang Group has established Social and Human Rights Policy dated 1/9/2016 signed by the Mill Director. The policy has a statement where the management is respect the right of employees to join any association freely which is one of the human rights definition. In Carotino POM, the policy has been briefed to the employees on 20-21/01/2017, 31/01/18 for Asia Estate and in Pahang Estate was on 29/01/2018. Attendant list was sighted. The policy was displayed at the notice board outside the office.                                                                                                                                                                                                                                                             | Complied       |
| 6.13.2                                                                                                                                                                                                                                         | As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Not applicable as estates were located in Peninsular.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Not applicable |
| <b>Principle 7: Responsible development of new plantings</b>                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                |
| Carotino Palm Oil Mill Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this annual surveillance assessment. The immature areas are replanted area. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                |
| <b>Principle 8: Commitment to continual improvement in key areas of activity</b>                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                |
| <b>Criterion 8.1:</b><br>Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                |
| 8.1.1                                                                                                                                                                                                                                          | The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.<br><br>As a minimum, these shall include, but are not necessarily be limited to:<br>• Reduction in use of pesticides(Criterion 4.6);<br>• Environmental impacts (Criteria 4.3, 5.1 and 5.2);<br>• Waste reduction (Criterion 5.3);<br>• Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);<br>• Social impacts (Criterion 6.1);<br>• Optimising the yield of the supply base.<br>- Major compliance - | Sustainability improvement plan for 2017/2018 available with allocated OPEX.<br>Minimise the use of certain pesticides:<br>- Mature & immature palm (P&D control : spraying with biological control chemical planting & weeding predator host plant, rat control and RB)<br>- IPM implementation (BOB, beneficial maintenance)<br>- Rotor slashing field inter-row<br>- Cover crop upkeep and maintenance<br><br>Environmental impacts & pollution and GHG emission<br>- Conservation of riparian buffer zone<br>- Maintenance of field drain<br>- Road maintenance programme<br>- River water monitoring<br>- Waste collection, segregation and recycling<br>- Zero burning practice for land preparation<br><br>Social impacts<br>- CSR project<br>- House repair and maintenance | Complied       |

**Appendix B: Approved Time Bound Plan**

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

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

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

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

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

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

**Appendix C: GHG Reporting Executive Summary**

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

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

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

| Emission per product | tCO <sub>2</sub> e/tProduct |
|----------------------|-----------------------------|
| CPO                  | 1.2                         |
| PK                   | 1.2                         |

| Extraction | %     |
|------------|-------|
| OER        | 19.54 |
| KER        | 4.95  |

| Production   | t/yr       |
|--------------|------------|
| FFB Process  | 127,576.07 |
| CPO Produced | 24,928.36  |
| PKO Produced | 6,315.02   |

| Land Use                    | Ha              |
|-----------------------------|-----------------|
| OP Planted Area             | 9,009.88        |
| OP Planted on peat          | 0               |
| Conservation (forested)     | 0               |
| Conservation (non-forested) | 0               |
| <b>Total</b>                | <b>9,009.88</b> |

**Summary of Field Emission and Sink**

|                                          | Own Crop*          |                          | Group              |                          | 3 <sup>rd</sup> Party |                          | Total              |                          |
|------------------------------------------|--------------------|--------------------------|--------------------|--------------------------|-----------------------|--------------------------|--------------------|--------------------------|
|                                          | tCO <sub>2</sub> e | tCO <sub>2</sub> e / FFB | tCO <sub>2</sub> e | tCO <sub>2</sub> e / FFB | tCO <sub>2</sub> e    | tCO <sub>2</sub> e / FFB | tCO <sub>2</sub> e | tCO <sub>2</sub> e / FFB |
| <b>Emission</b>                          |                    |                          |                    |                          |                       |                          |                    |                          |
| Land Conversion                          | 77,821.4           | 0.61                     | 0                  | 0                        | 0                     | 0                        | 77,821.4           | 0.61                     |
| CO <sub>2</sub> Emission from fertilizer | 11,739.19          | 0.09                     | 0                  | 0                        | 0                     | 0                        | 11,739.19          | 0.09                     |
| NO <sub>2</sub> Emission                 | 5,234.43           | 0.04                     | 0                  | 0                        | 0                     | 0                        | 5,234.43           | 0.04                     |
| Fuel Consumption                         | 3,093.31           | 0.02                     | 0                  | 0                        | 0                     | 0                        | 3,093.31           | 0.02                     |
| Peat Oxidation                           | 0                  | 0                        | 0                  | 0                        | 0                     | 0                        | 0                  | 0                        |
| <b>Sink</b>                              |                    |                          |                    |                          |                       |                          |                    |                          |
| Crop Sequestration                       | -74,715.42         | -0.59                    | 0                  | 0                        | 0                     | 0                        | -74,715.42         | -0.59                    |
| Conservation Sequestration               | 0                  | 0                        | 0                  | 0                        | 0                     | 0                        | 0                  | 0                        |
| <b>Total</b>                             | <b>23,172.91</b>   | <b>0.18</b>              | <b>0</b>           | <b>0</b>                 | <b>0</b>              | <b>0</b>                 | <b>23,172.91</b>   | <b>0.18</b>              |



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*\*Note: Includes both estates and smallholders*

**Summary of Mill Emission and Credit**

|                              | tCO <sub>2</sub> e | tCO <sub>2</sub> e/tFFB |
|------------------------------|--------------------|-------------------------|
| <b>Emission</b>              |                    |                         |
| POME                         | 16,163.13          | 0.13                    |
| Fuel Consumption             | 517.32             | 0                       |
| Grid Electricity Utilization | 195.99             | 0                       |
| <b>Credits</b>               |                    |                         |
| Export of Grid Electricity   | -22.18             | 0                       |
| Sales of PKS                 | -3,612.33          | -0.03                   |
| Sales of EFB                 | 0                  | 0                       |
| <b>Total</b>                 | <b>13,241.92</b>   | <b>0.1</b>              |

**Summary of Kernel Crusher Emission and Credit (if applicable)**

| Emissions               | tCO <sub>2</sub> e |
|-------------------------|--------------------|
| PK from own mill        | 7,562.28           |
| PK from other source    | 0                  |
| Fuel Consumptions       | 0                  |
| Total Crusher emissions | 0                  |

\*This mill has no kernel crusher operation.

| <b>Palm Oil Mill Effluent (POME) Treatment:</b> |     |
|-------------------------------------------------|-----|
| Divert to Compost (%)                           | 0   |
| Divert to anaerobic diversion (%)               | 100 |

| <b>POME Diverted to Anaerobic Digestion:</b>       |     |
|----------------------------------------------------|-----|
| Divert to anaerobic pond (%)                       | 100 |
| Divert to methane captured (flaring) (%)           | 25  |
| Divert to methane captured (energy generation) (%) | 75  |

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

| <b>5.1 Applicability of the general chain of custody requirements for the supply chain</b> |                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                    |                                                                                    |
|--------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|
|                                                                                            | <b>Requirement</b>                                                                                                                                                                                                                                                                                                                                                                                                  | <b>Evidence</b>                                                                                                                                                                    | <b>Compliance (Yes / No or N/A) For any N/A raised, justification is required.</b> |
| 5.1.1                                                                                      | The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification. | Carotino Palm Oil Mill takes legal ownership and physically handles its RSPO certified oil palm products i.e. CPO and PK.                                                          | Yes                                                                                |
| 5.1.2                                                                                      | Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.                                                                          | Carotino POM is not a trading company. Therefore, this requirement is not applicable.                                                                                              | N/A                                                                                |
| 5.1.3                                                                                      | Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.                                                                                                                                                                                                                                                             | The parent company (JC Chang Group) is the member of RSPO. Membership No.: 2-0029-06-000-00 since 5/3/2010.<br>Palmtrace member ID: RSPO_PO1000000128 (Carotino Sdn Bhd).          | Yes                                                                                |
| 5.1.4                                                                                      | Processing aids do not need to be included within an organization's scope of certification.                                                                                                                                                                                                                                                                                                                         | Processing aids are not used in the milling process.                                                                                                                               | N/A                                                                                |
| <b>5.2 Supply chain model</b>                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                    |                                                                                    |
| 5.2.1                                                                                      | The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.                                                                                                                                                                                            | The FFB suppliers are of RSPO certified estates which consists of Carotino certification unit only. Declassification of the CPO or PK was done in accordance to the correct order. | Yes                                                                                |
| 5.2.2                                                                                      | The site can use one (1) or a combination of supply chain models as audited and certified by the CB.                                                                                                                                                                                                                                                                                                                | Carotino POM is IP certified and sales of the products were of IP or conventional only.                                                                                            | Yes                                                                                |
| <b>5.3. Documented Procedures</b>                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                    |                                                                                    |
| 5.3.1                                                                                      | The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of                                                                                                                                                                                                                                                                                       | There were 13 SOPs for critical points established in order to implement RSPO SC:                                                                                                  | Yes                                                                                |

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|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|
|              | <p>the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> </ul>                                                                                          | <ol style="list-style-type: none"> <li>1) SOP reception station (23/12/2013)</li> <li>2) Grading station (1/10/2016)</li> <li>3) Pressing station (12/12/11)</li> <li>4) Clarification station (12/12/11)</li> <li>5) Nut plant (12/12/11)</li> <li>6) Kernel Plant (12/12/11)</li> <li>7) Bio-gas plant (15/1/14)</li> <li>8) Storage (16/12/16)</li> <li>9) Dispatch (20/10/17)</li> <li>10) ETP (12/12/11)</li> <li>11) Standard Mass Balance Calculation (18/12/14)</li> <li>12) Mechanism for handling non-conforming FFB (14/12/14)</li> <li>13) Records and documentation (19/12/14)</li> </ol> |                              |
|              | <ul style="list-style-type: none"> <li>• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> </ul>                                                                                                                                                                       | <p>Among the records included in the procedures are:</p> <ul style="list-style-type: none"> <li>• FFB receiving</li> <li>• Weighbridge tickets</li> <li>• Dispatch of CPO/PK – weighbridge ticket, delivery order, shipping document</li> <li>• Summary Mass Balance</li> <li>• Daily production report</li> <li>• Internal audit report</li> </ul>                                                                                                                                                                                                                                                    | <p>Yes</p>                   |
|              | <ul style="list-style-type: none"> <li>• Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization’s procedures for the implementation of this standard.</li> </ul> | <p>Overall responsibility is assigned to the Mill Manager (Mr. Kenny Alvin Ligungjang). Ref.: Appointment letter from Mill Director dated 7/7/2014.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                | <p>Yes</p>                   |
| <p>5.3.2</p> | <p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p>                                                                                                   | <p>Ref.: Guideline for Internal Auditing of the Sustainability System, T/001-01/2014, dated 4/7/2014. The procedure consists of the following elements:</p> <ul style="list-style-type: none"> <li>• Procedure details – responsibility of internal lead auditor, frequency, sampling, reporting, handling of non-conformities (issuing and closing), records keeping</li> <li>• Frequency of IA to be conducted is twice a year. Based on the “Internal Control Assessment &amp; External Audit Schedule 2018”, the IA is planned to be conducted in June and December.</li> </ul>                    | <p>Major non-conformance</p> |

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|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
|                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | However, the internal audit report unable to provide evidence of conformance to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. Therefore, a non-conformity report was assigned due to this lapse.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |     |
|                                     | ii) effectively implements and maintains the standard requirements within its organization                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Last internal audit was conducted on 12-14/12/2017 by Ms. Stearonthia Riting @ Sirin. Based on the internal audit report, there was no non-conformity found.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Yes |
| <b>5.4. Purchasing and goods in</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |     |
| 5.4.1                               | <p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply Chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul> | <p>When FFB delivered to the mill from the estates, the transporters presented Delivery Order (DO) and in some cases, estate’s weighbridge tickets to the mill weighbridge clerk in order the FFB to be received by the mill.</p> <p>E.g. of information available in the dispatch tickets is as follows:</p> <ul style="list-style-type: none"> <li>• FFB Dispatch Chit No. – 124888</li> <li>• Estate’s names – Asia Palm Oil Mill, Hwa Li Oil Palm.</li> <li>• Date &amp; time of delivery</li> <li>• Field No. – 00A1</li> <li>• No. of bunches</li> <li>• Vehicle no.</li> </ul> <p>E.g. of information available in the estate’s weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> <li>• Name of estates – Hwa Li Oil Palm.</li> <li>• Field No. – 99B04, 98A04.</li> <li>• Name of transporter company</li> <li>• Name of driver</li> <li>• Vehicle no.</li> <li>• Weighbridge ticket no. – FFB18000992W</li> <li>• Date &amp; time of delivery</li> <li>• Total bunches</li> <li>• Seal no.</li> <li>• Net weight</li> </ul> | Yes |
|                                     | <ul style="list-style-type: none"> <li>• Information shall be complete and can be presented either on a single document or across a range of documents issued for</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | The information was available in various documents such as delivery order and weighbridge tickets.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Yes |

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|                                    | RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                  |     |
|                                    | <ul style="list-style-type: none"> <li>The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance.</li> </ul> | The mill does not accept any crop other than Carotino/JC Chang Group.                                                                                                                                                                                                                                            | Yes |
|                                    | <ul style="list-style-type: none"> <li>A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (<a href="http://www.rspo.org">www.rspo.org</a>) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements.</li> </ul>                                                  | The mill does not accept any crop other than Carotino/JC Chang Group.                                                                                                                                                                                                                                            | N/A |
|                                    | <ul style="list-style-type: none"> <li>The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements.</li> </ul>                                                                                                                                                                                                         | The mill does not accept any crop other than Carotino/JC Chang Group.                                                                                                                                                                                                                                            | N/A |
| 5.4.2                              | The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.                                                                                                                                                                                                                                                                                                                                                               | <p>Ref.: Mechanism For Handling Non-Conforming FFB, MEC-02/2014-CPOM dated 14/12/14.</p> <p>Based on the procedure, if certificate of the FFB supplier found to be invalid, the FFB shall be downgraded to non-certified and the CPO and PK produced from the material shall also be downgraded accordingly.</p> | Yes |
| <b>5.5. Outsourcing activities</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                  |     |
| 5.5.1                              | In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and                                                                               | NA – no outsource activity                                                                                                                                                                                                                                                                                       | N/A |

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|       | <p>independment mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p> |                            |     |
| 5.5.2 | <p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a. The site has legal ownership of all input material to be included in outsourced processes;</p>                                                                                                    | NA – no outsource activity | N/A |
|       | <p>b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p>     | NA – no outsource activity | N/A |
|       | <p>c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p>                                                                                                                                                                           | NA – no outsource activity | N/A |
|       | <p>d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.</p>               | NA – no outsource activity | N/A |
| 5.5.3 | <p>The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.</p>                                                                                                                                                                    | NA – no outsource activity | N/A |
| 5.5.4 | <p>The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.</p>                                                                                                                                     | NA – no outsource activity | N/A |

**5.6. Sales and goods out**

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|-------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| <p>5.6.1</p>                                    | <p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/ delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul> | <p>Carotino POM ensured the required information is available in document form.<br/> <u>CPO</u><br/>           Delivery of CPO is only to Carotino Sdn Bhd – no official contract involved</p> <p>Transport documents: Dispatch slip, Palm Oil Delivery Order, MPOB form</p> <p><u>PK</u><br/>           Buyer: Non-disclosure</p> <p>Seller: Carotino Sdn Bhd, Pasir Gudang, Johor</p> <p>Delivery/collection month: Aug 2017</p> <p>Date of contract: 7/6/2017</p> <p>Commodity: RSPO (SG) Palm Kernel</p> <p>Quantity: 250 mt</p> <p>Transport documents: Dispatch slip, Palm Kernel Delivery Order</p> <p>Supply chain certificate no.: RSPO 649410</p> <p>Unique #: Contract no.</p> | <p>Yes</p> |
|                                                 | <ul style="list-style-type: none"> <li>• Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p>Information is complete and available in various documents such as sales contract, mill weighbridge ticket and delivery note.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>Yes</p> |
|                                                 | <ul style="list-style-type: none"> <li>• For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                       | <p>Verification of transaction summary extracted from PalmTrace confirmed that all announcements for CSPO and CSPK were in order.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>Yes</p> |
| <p><b>5.7. Registration of transactions</b></p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |            |

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|----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|
| 5.7.1                | <p>Supply chain actors who:</p> <ul style="list-style-type: none"> <li>are mills, traders, crushers and refineries and;</li> <li>take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <p>The registration of PalmTrace is carried out by Carotino Sdn Bhd, Pasir Gudang, Johor. All transaction will be registered in the PalmTrace.</p>                                                                                                                                                                                                                                                        | Yes                                         |
| 5.7.2                | <p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> <li>Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.</li> <li>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</li> <li>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</li> <li>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</li> </ul> | <p>Based on the announcement summary, all the registrations were found to be in order.</p> <p>Not applicable. Products are not sold beyond refinery.</p> <p>Based on the MB accounting, the removal of volumes was done correctly when the products were sold as conventional or other scheme (e.g. ISCC).</p> <p>Based on the announcement summary, all the confirmations were found to be in order.</p> | <p>Yes</p> <p>N/A</p> <p>Yes</p> <p>Yes</p> |
| <b>5.8. Training</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                           |                                             |
| 5.8.1                | <p>The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <p>Training plan for 2017/2018-by Stations were available – incorporation with other training plans. The dates varies depending on the departments.</p>                                                                                                                                                                                                                                                   | Yes                                         |
| 5.8.2                | <p>Appropriate training shall be provided by the organization for personnel carrying out the</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>Relevant personnel to supply chain implementation as defined by the CU</p>                                                                                                                                                                                                                                                                                                                             | Yes                                         |



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|                                 | tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.                                                                                                                                                                                                                                                                                                                                                                                                                                                        | are the personnel that involve in supply chain implementation – weighbridge clerk, lab personnel, supervisors, grader, admin officer and technical assistant. In Carotino case, 7 personnel were identified.<br><br>Based on training records, last trainings were:<br><br><ul style="list-style-type: none"> <li>• Weighbridge – 21/8/2017</li> <li>• Lab – 22/6/2017</li> <li>• Grading – 17/1/2017</li> <li>• Supervisor – 6/12/2016</li> <li>• Admin officer – 14/7/2016</li> <li>• Technical assistant – 14/7/2016</li> </ul> |     |
| <b>5.9. Record Keeping</b>      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |     |
| 5.9.1                           | The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.                                                                                                                                                                                                                                                                                                                                                                                                                                           | All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date and accessible.                                                                                                                                                                                                                                                                                                                                                                          | Yes |
| 5.9.2                           | Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.                                                                                                                                                                                                                                                                                                                                                                                                  | The mill maintained its records related to supply chain for minimum of two years. Sampled: CPO and PK weighbridge tickets and DO for February 2016 – all records/documents were still in place.                                                                                                                                                                                                                                                                                                                                    | Yes |
| 5.9.3                           | The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.                                                                                                                                                                                                                                                                                                                                           | NA – product of the CPO mill is containing 100% palm oil.                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | N/A |
| <b>5.10. Conversion factors</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |     |
| 5.10.1                          | Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website ( <a href="http://www.rspo.org">www.rspo.org</a> ); RSPO Rules for Physical Transition of Oleochemicals and its Derivaties. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries. | Conversion factor of CPO and PK production is depending on the actual OER and KER. The average for the last period under review was 19.42% (OER) & 4.94% (KER).                                                                                                                                                                                                                                                                                                                                                                    | Yes |

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| 5.10.2                         | Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.                                                                                                    | The facility is using the actual yield (OER and KER) performance.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | NA                    |
| <b>5.11. Claims</b>            |                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                       |
| 5.11.1                         | The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.                                                 | No claims or usage of trade logo. Nonetheless, the organisation is aware of the rules.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | N/A                   |
| <b>5.12. Complaints</b>        |                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                       |
| 5.12.1                         | The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.                                                                                                        | <p>Addressed in the E/001-06/2017, dated 6/1/2017, – internal/external complaint shall be handled through SOP on Mechanism for Complaint and Grievances. Means of lodging complaints - unlimited verbally/writing. Recording of verbal complaint is through utilization of “Format of Grievance and Complaints Register” [ref.: Clause 13 of the procedure] – in the format has the information about:</p> <ul style="list-style-type: none"> <li>• Nature of complaint</li> <li>• Details of complainants – name, date and contact info</li> <li>• Details of Recipient of complainant – Name, date, designation</li> <li>• Action taken to settle the grievance by (Level...)</li> <li>• Ref/Date Informed the Complainant</li> <li>• Remarks (if any)</li> </ul> <p>There has been no complaint with regards to RSPO SCC since the last audit.</p> | Yes                   |
| <b>5.13. Management Review</b> |                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                       |
| 5.13.1                         | The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.                                                                            | Management review on RSPO supply chain implementation has yet to be conducted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Major non-conformance |
| 5.13.2                         | <p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> <li>• Results of internal audits covering RSPO Supply Chain Certification Standard.</li> <li>• Customer feedback.</li> </ul> | Management review on RSPO supply chain implementation has yet to be conducted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Refer 5.13.1          |

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|        | <ul style="list-style-type: none"> <li>• Status of preventive and corrective actions.</li> <li>• Follow-up actions from management reviews.</li> <li>• Changes that could affect the management system.</li> <li>• Recommendations for improvement.</li> </ul> |                                                                                |              |
| 5.13.3 | <p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> <li>• Improvement of the effectiveness of the management system and its processes.</li> <li>• Resource needs.</li> </ul>   | Management review on RSPO supply chain implementation has yet to be conducted. | Refer 5.13.1 |

**Appendix E: CPO Mill Supply Chain Assessment Report (Module D - CPO Mills: *Identity Preserved*)**

| Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Compliance                                                                                                                                                                                                                                                                                                                               |
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| <b>D.1 Definition</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                          |
| D.1.1 A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. 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 Module E is applicable.                      | 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. |
| <b>D.2 Explanation</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                          |
| E.2.1 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. For an independent mill, the estimated tonnage of CPO and PK products shall be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report. | The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.                                                                                                                                                                                         |

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|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>D.2.2 The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).</p>                                                                                                                                      | <p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <p><b>D.3 Documented procedures</b></p>                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <p>D.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</p> | <p>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 because only certified FFB from own supply base is received and processed at Carotino Palm Oil Mill.</p> <p>Among the established SOP are:</p> <ul style="list-style-type: none"> <li>i) CCP/01-03/2013 (SOP at Reception Station)</li> <li>ii) CCP/08-04/2014 (SOP to dispatch CP and PK), dated 20/12/14</li> <li>iii) MBC-02/2014-CPOM (SOP for RSPO SCC Standard Products Calculation, dated 18/12/14)</li> <li>iv) Mechanism For Handling Non-Conforming FFB, MEC-02/2014-CPOM dated 14/12/14</li> <li>v) SOP for reporting and documentation, CP/12-03/2014. Dated 19/12/14</li> </ul> |
| <p>b) The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site’s procedures for the implementation of this standard.</p>                            | <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.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <p>D.3.2 The site shall have documented procedures for receiving and processing certified FFBs.</p>                                                                                                                                                                                                                             | <p>Carotino Palm Oil mill has documented procedures (as mentioned above in D 3.1) for the incoming FFB, processing and outgoing palm products (CPO and PK). The procedure covers receiving and processing certified and non-certified FFBs.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <p><b>D.4 Purchasing and goods in</b></p>                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <p>D.4.1 The site shall verify and document the tonnage and sources of certified FFBs received.</p>                                                                                                                                                                                                                             | <p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit. Carotino mill have system to verify at the weighbridge.</p> <p>When FFB delivered to the mill from the estates, the transporters presented Delivery Order (DO) and in some cases, estate’s weighbridge tickets to the mill weighbridge clerk in order the FFB to be received by the mill.</p>                                                                                                                                                                                                                                                                                                                                                                      |

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|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                     | <p>E.g. of information available in the dispatch tickets is as follows:</p> <ul style="list-style-type: none"> <li>• FFB Dispatch Chit No. – 124888</li> <li>• Estate’s names – Asia Palm Oil Mill, Hwa Li Oil Palm.</li> <li>• Date &amp; time of delivery</li> <li>• Field No. – 00A1</li> <li>• No. of bunches</li> <li>• Vehicle no.</li> </ul> <p>E.g. of information available in the estate’s weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> <li>• Name of estates – Hwa Li Oil Palm.</li> <li>• Field No. – 99B04, 98A04.</li> <li>• Name of transporter company</li> <li>• Name of driver</li> <li>• Vehicle no.</li> <li>• Weighbridge ticket no. – FFB18000992W</li> <li>• Date &amp; time of delivery</li> <li>• Total bunches</li> <li>• Seal no.</li> <li>• Net weight</li> </ul> |
| <p>D.4.2 The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p>                                                                                                                                                  | <p>There was no overproduction projected. Nonetheless, the facility is aware to this requirement.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <p><b>D.5 Record keeping</b></p>                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <p>D.5.1 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.</p>                                                                                                                 | <p>The record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK was recorded in “Real-time Basis CPO (or PK) Transfer Monitoring”. Information available in the format is date, FFB processed, OER, CPO amount [opening, produced and closing] and transferred CPO [mill weight, refinery weight]. However, it was found that the calculations were still on were still in three-monthly basis instead of real-time. Therefore, a non-conformity was assigned due to this lapse.</p>                                                                                                                                                                                                                                                                                              |
| <p><b>D.6 Processing</b></p>                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <p>D.6.1 The site 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 product 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, no mixing with non-certified FFB in processing.</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. This ensures that 100% segregated materials are reached.</p>                                                                                                                                                                                                                                                                                                                                                                        |

**Supply Chain Declaration** *(Applicable For Appendix D)*

| <b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b> |                     |                                                       |                                                         |                             |
|------------------------------------------------------------------------------------------|---------------------|-------------------------------------------------------|---------------------------------------------------------|-----------------------------|
| <b>No.</b>                                                                               | <b>Month - Year</b> | <b>Volume of FFB from certified supply bases (MT)</b> | <b>Volume of FFB from uncertified supply bases (MT)</b> | <b>Total FFB/Month (mt)</b> |
| 1                                                                                        | Feb 2017            | 7,385.35                                              | -                                                       | 7,385.35                    |
| 2                                                                                        | Mar 2017            | 10,093.12                                             | -                                                       | 10,093.12                   |
| 3                                                                                        | Apr 2017            | 10,150.28                                             | -                                                       | 10,150.28                   |
| 4                                                                                        | May 2017            | 10,671.09                                             | -                                                       | 10,671.09                   |
| 5                                                                                        | Jun 2017            | 8,779.39                                              | -                                                       | 8,779.39                    |
| 6                                                                                        | Jul 2017            | 12,772.87                                             | -                                                       | 12,772.87                   |
| 7                                                                                        | Aug 2017            | 12,771.37                                             | -                                                       | 12,771.37                   |
| 8                                                                                        | Sep 2017            | 12,175.72                                             | -                                                       | 12,175.72                   |
| 9                                                                                        | Oct 2017            | 14,317.21                                             | -                                                       | 14,317.21                   |
| 10                                                                                       | Nov 2017            | 13,540.56                                             | -                                                       | 13,540.56                   |
| 11                                                                                       | Dec 2017            | 14,178.42                                             | -                                                       | 14,178.42                   |
| 12                                                                                       | Jan 2018            | 12,858.95                                             | -                                                       | 12,858.95                   |
|                                                                                          | <b>Total</b>        | <b>139,694.33</b>                                     | <b>-</b>                                                | <b>139,694.33</b>           |

| <b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b> |                     |                           |                          |
|--------------------------------------------------------------------------|---------------------|---------------------------|--------------------------|
| <b>No.</b>                                                               | <b>Month - Year</b> | <b>Certified CPO (MT)</b> | <b>Certified PK (MT)</b> |
| 1                                                                        | Feb 2017            | 1,448.07                  | 409.87                   |
| 2                                                                        | Mar 2017            | 1,930.99                  | 535.04                   |
| 3                                                                        | Apr 2017            | 2,006.69                  | 499.97                   |
| 4                                                                        | May 2017            | 2,080.62                  | 511.86                   |
| 5                                                                        | Jun 2017            | 1,770.18                  | 406.34                   |
| 6                                                                        | Jul 2017            | 2,531.70                  | 596.04                   |
| 7                                                                        | Aug 2017            | 2,499.84                  | 641.90                   |
| 8                                                                        | Sep 2017            | 2,428.46                  | 595.62                   |
| 9                                                                        | Oct 2017            | 2,799.65                  | 692.90                   |
| 10                                                                       | Nov 2017            | 2,525.97                  | 672.64                   |
| 11                                                                       | Dec 2017            | 2,759.08                  | 718.39                   |
| 12                                                                       | Jan 2018            | 2,350.90                  | 620.08                   |
|                                                                          | <b>Total</b>        | <b>27,132.15</b>          | <b>6,900.65</b>          |

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| <b>C. Records of Certified CPO &amp; PK Sold under PalmTrace to Buyers since the last audit (if any)</b> |                |                                                                       |                         |                        |
|----------------------------------------------------------------------------------------------------------|----------------|-----------------------------------------------------------------------|-------------------------|------------------------|
| No.                                                                                                      | Buyers Name    | Palmtrace Trading No                                                  | Certified CPO Sold (MT) | Certified PK Sold (MT) |
| *1                                                                                                       | Non-disclosure | TR-95b06558-6fb2 (11/2/2017)<br>until<br>TR-459f0715-801c (18/1/2018) | 14,833.62               |                        |
| *2                                                                                                       | Non-disclosure | TR-27646269-7ea2 (11/2/2017)<br>until<br>TR-30105af8-914c (9/1/2018)  |                         | 6,049.37               |
| <b>Total</b>                                                                                             |                |                                                                       | <b>14,833.62</b>        | <b>6,049.37</b>        |

*\*Too many transactions to be listed down in the table – a total of more than 500 transactions.*

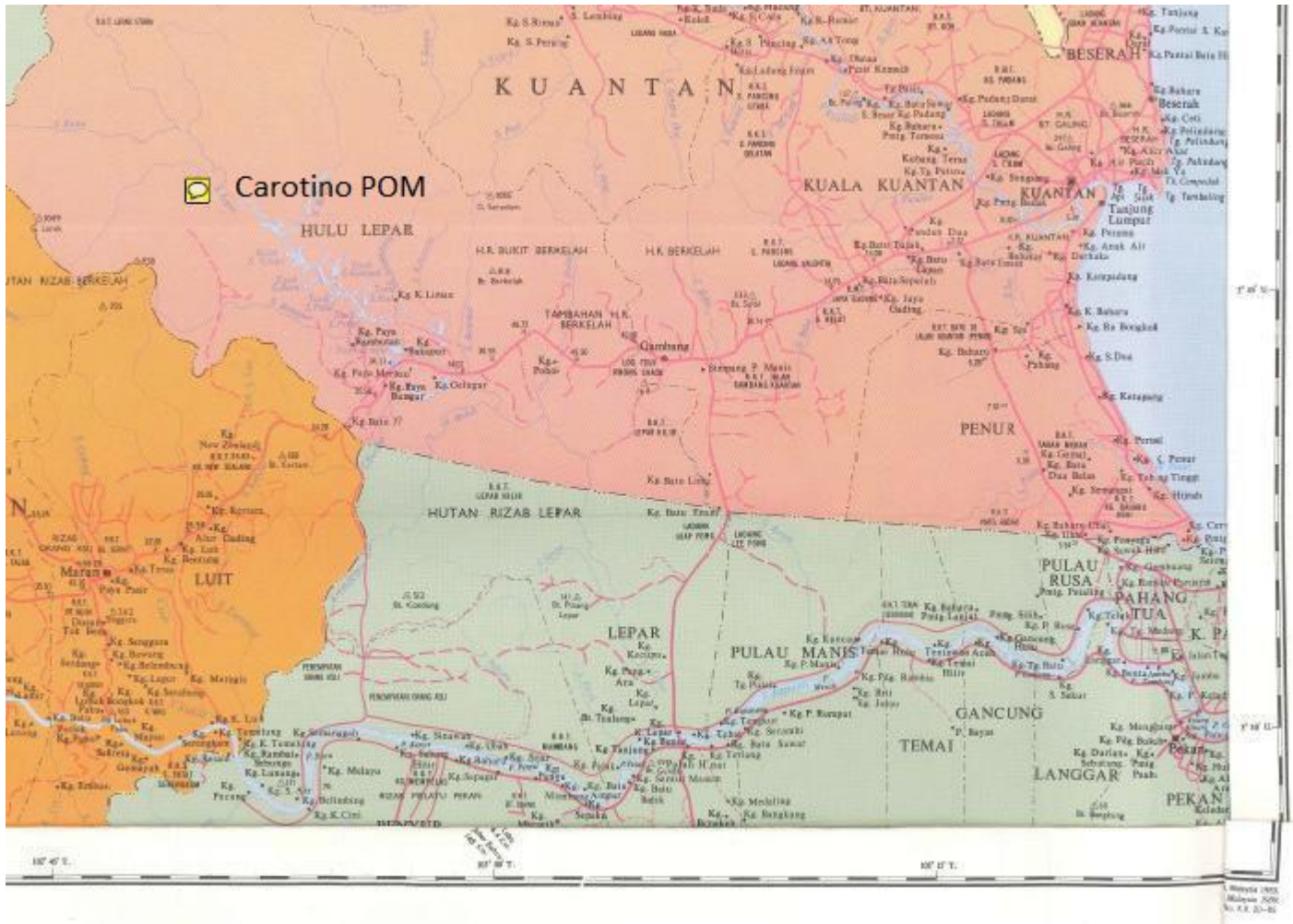
| <b>D. Records of CPO &amp; PK Sold under other schemes (ISCC credits) to Buyers since the last audit (if any)</b> |                |             |                  |              |
|-------------------------------------------------------------------------------------------------------------------|----------------|-------------|------------------|--------------|
| No.                                                                                                               | Buyers Name    | Scheme Name | CPO Sold (MT)    | PK Sold (MT) |
| 1                                                                                                                 | Non-disclosure | ISCC        | 12,111.19        | 0            |
| <b>Total</b>                                                                                                      |                |             | <b>12,111.19</b> | <b>0</b>     |

| <b>E. Records of CPO &amp; PK Sold as conventional to Buyers since the last audit (if any)</b> |                |               |               |  |
|------------------------------------------------------------------------------------------------|----------------|---------------|---------------|--|
| No.                                                                                            | Buyers Name    | CPO Sold (MT) | PK Sold (MT)  |  |
| 1                                                                                              | Non-disclosure | 0             | 836.45        |  |
| <b>Total</b>                                                                                   |                | <b>0</b>      | <b>836.45</b> |  |

| <b>F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)</b> |             |                      |                                         |
|----------------------------------------------------------------------------------------------------|-------------|----------------------|-----------------------------------------|
| No.                                                                                                | Buyers Name | PalmTrace Trading No | RSPO Credits of Certified CPO Sold (MT) |
| N/A                                                                                                | N/A         | N/A                  | N/A                                     |
|                                                                                                    |             |                      |                                         |

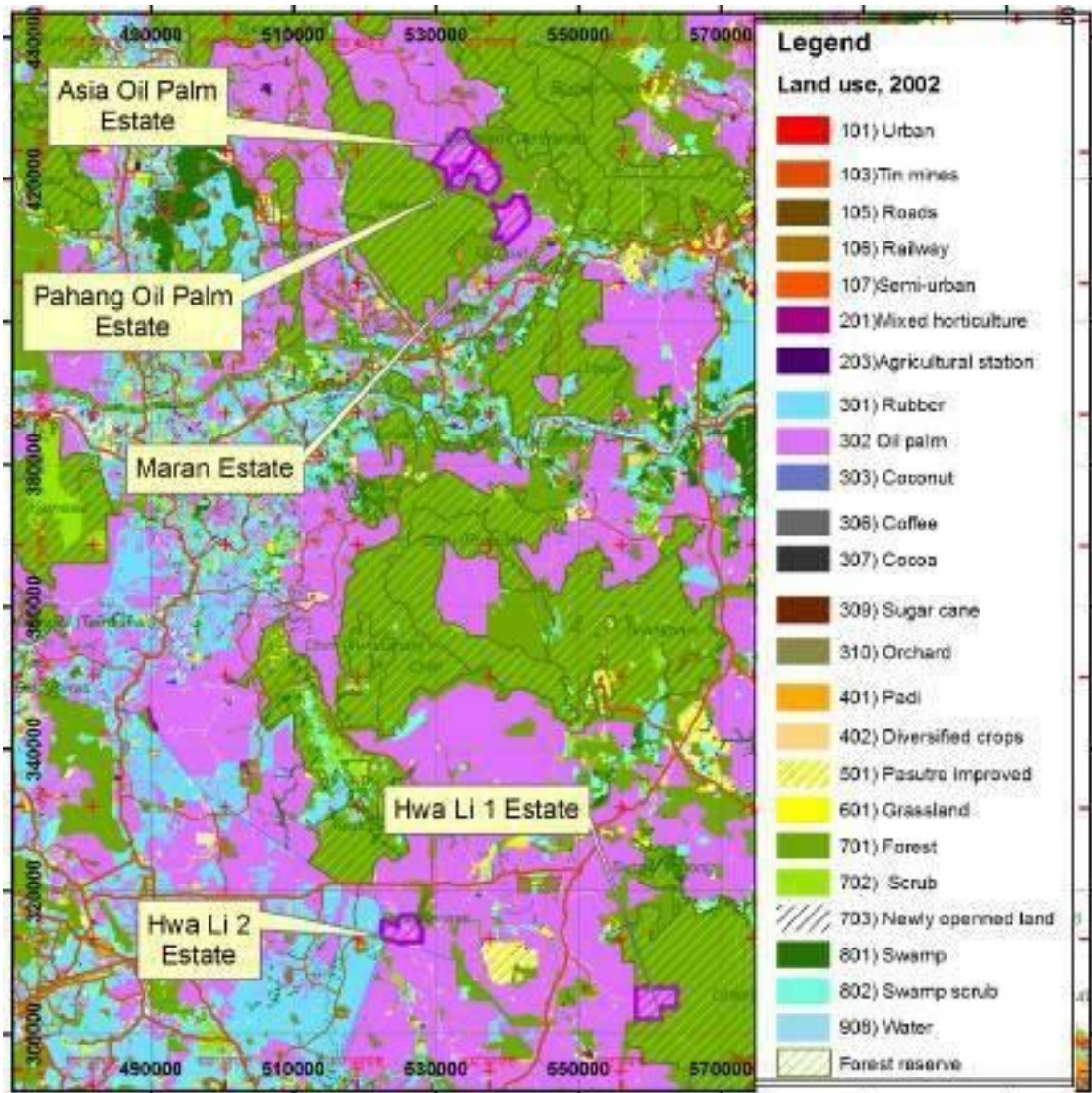
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**Appendix G: Location Map of Carotino Palm Oil Mill Certification Unit and Supply bases**





**Appendix H: Location Map of Asia Oil Palm Estate and Pahang Oil Palm Estate**



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

Not applicable

## Appendix K: List of Abbreviations

|            |                                                                    |
|------------|--------------------------------------------------------------------|
| 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                                       |