

**RSPO PRINCIPLE AND CRITERIA –
2nd ANNUAL SURVEILLANCE ASSESSMENT (ASA2)
Public Summary Report**

TSH Resources Berhad
Client company Address: Head office: Jalan Apas & Bangunan TSH TB9, KM 7 91000 Tawau Sabah, Malaysia
Certification Unit: Lahad Datu Palm Oil Mill & supply base Location of Certification Unit: KM 48, Lahad Datu – Sandakan Highway 90200 Kinabatangan Sabah, Malaysia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0173-14-000-00	Membership Approval Date	17/11/2014
Parent Company Name	TSH Resources Berhad		
Address	Head office : Jalan Apas & Bangunan TSH, TB 9, KM 7 91000 Tawau, Sabah, Malaysia		
Subsidiary (Certification Unit Name)	TSH Plantations Sdn Bhd – Lahad Datu Palm Oil Mill		
Address	KM 48, Lahad Datu – Sandakan Highway 90200 Kinabatangan, Sabah, Malaysia		
Contact Name	Mr. Bruno Bungkong (Mill Manager)		
Website	http://www.tsh.com.my/	E-mail	ldmill@tsh.com.my ; bruno.bungkong@tsh.com.my
Telephone	+60 198331356	Facsimile	+6089 913000

2. Certification Information			
Certificate Number	RSPO 652155	Date of First Certification	23/03/2017
		Certificate Start Date	23/03/2017
		Certificate Expiry Date	22/03/2022
Scope of Certification	Palm Oil and Palm Kernel Production from Lahad Datu Palm Oil Mill and supply base (Ong Yah Ho & Gomantong Estate)		
Applicable Standards	RSPO P&C MYNI 2014; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module E)		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 682916	MS 2530-4 Malaysia Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn Bhd	22/08/2023
MSPO 698140	MS 2530-3 Malaysia Sustainable Palm Oil (MSPO) Part 3		22/08/2023

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4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
TSH Plantation Sdn Bhd (Lahad Datu Palm Oil Mill)	KM 48, Lahad Datu – Sandakan Highway 90200 Kinabatangan, Sabah, Malaysia	5° 19' 29.10" N	118° 02' 34.69" E
TSH Palm Products Sdn Bhd (Ong Yah Ho Estate)	KM 48, Lahad Datu – Sandakan Highway 90200 Kinabatangan, Sabah, Malaysia	5° 19' 26.1" N	118° 02' 43.4" E
TSH Resources Bhd (Gomantong Estate)	KM 48, Lahad Datu – Sandakan Highway 90200 Kinabatangan, Sabah, Malaysia	5° 34' 56" N	118° 04' 13" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Ong Yah Ho	1,905.00	19.00	76.00	2,000.00	95.25
Gomantong	947.00	-	60.00	1,007.00	94.04
Total	2,852.00	19.00	136.00	3,007.00	94.85

6. Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Ong Yah Ho	-	-	1,905.00	-	-	1,905.00	-
Gomantong	318.00	53.00	-	576.00	-	629.00	318.00
Total (ha)	318.00	-	1,905.00	576.00	-	2,534.00	318.00

7. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (Apr 18 – Mar 19)	Actual (Dec 17 – Nov 18)	Forecast (Apr 19 – Mar 20)
Ong Yah Ho	56,783.00	48,611.59	49,538.86
Gomantong	20,045.00	16,035.39	15,947.47
Total	76,828.00	64,646.98	65,486.33

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8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estate	Tonnage / year		
	Estimated (Apr 18 – Mar 19)	Actual (Dec 17 – Nov 18)	Forecast (Apr 19 – Mar 20)
	N/A	Nil	N/A
Total			

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (Apr 18 – Mar 19)	Actual (Dec 17 – Nov 18)	Forecast (Apr 19 – Mar 20)
Overall	84,838.47	81,235.56	84,838.47
Total	84,838.47	81,235.56	84,838.47

10. Certified Tonnage			
Mill Capacity: 60 MT/hr	Estimated (Apr 18 – Mar 19)	Actual (Dec 17 – Nov 18)	Forecast (Apr 19 – Mar 20)
	FFB	FFB	FFB
	76,828.00	64,646.98	65,486.33
SCC Model: MB	CPO (OER: 20.50%)	CPO (OER: 21.07%)	CPO (OER: 20.50%)
	15,749.74	13,349.62	13,424.70
	PK (KER: 5.40%)	PK (KER: 5.61%)	PK (KER: 5.50%)
	4,148.71	3,555.59	3,601.75

11. Actual Sold Volume (CPO)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	8,749.36	-	-	0.00	8,749.36

*Actual sold volume may be different due to monthly declaration in PalmTrace

12. Actual Sold Volume (PK)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	2,698.86	-	-	0.00	2,698.86

*Actual sold volume may be different due to monthly declaration in PalmTrace

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

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: ASI-ACC-067)
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
No. 8, Jalan Kerinchi
59200 Kuala Lumpur
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BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The on-site annual surveillance assessment was conducted from 4-7/12/2018. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

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

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between

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the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 4)	Year 5 (ASA 5)
Lahad Datu Palm Oil Mill	✓	✓	✓	✓	✓
Ong Yah Ho Estate	✓	✓	✓	✓	✓
Gomantong Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: December 16, 2019 – December 19, 2019

Total No. of Mandays: 10 mandays (including 1 manday SC audit for mill)

2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Hafriazhar Mohd Mokhtar	Team leader	Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO P&C and SCCS standards and recently completed his RSPO P&C Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea and Solomon Islands. During assessment, he covered the mill and estate best practices, legal issues, social issues, workers consultation, stakeholder consultation, environmental and occupational safety & health. He is fluent in Bahasa Malaysia and English languages.
Amir Bahari	Team member	He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996. He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 38 man-days in the auditing profession after ending career in the plantation industry. During the assessment he covered mills and estates best practices, workers consultation and occupational safety & health. He is fluent in both verbal/written in Bahasa Malaysia and English.
Mahzan Munap	Team member	He holds a MBA from Ohio University and B Sc. in Petroleum Engineering from University of Missouri, USA. Collected over 370 days of auditing experience in OHSAS 18001 and MS 1722 OHSMS (72 days for palm oil milling and 8 days for oil palm plantation). CIMAH competent person with Malaysia Department of Occupational Safety and Health (DOSH) since 1997. An Occupational Safety and Health Trainer at INSTEP PETRONAS. Successfully completed RSPO Lead Assessor Course in 2008 and IRCA accredited Lead Assessor training for ISO 9001 and RABQSA/IRCA EMS Lead Assessor Course for ISO 14001 in 2008. During this assessment, he covered Mill & Estate Best Practices, Legal, OSH, Workers Consultation & etc.

Accompanying Persons:

No.	Name	Role
Nil	n/a	n/a

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2.3 Assessment Plan

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

Date	Time	Subjects	HMM	AB	MM
Monday 3/12/2018	2000 – 2215	Audit Team travel to Kota Kinabalu via MH 2628 (KUL - BKI) & Overnight @ BKI	✓	-	-
Tuesday 4/12/2018	0610 – 0705	Audit Team travel to Lahad Datu via & MH 3010 (BKI – LDU)	✓	-	-
	0830 – 1630	Lahad Datu Palm Oil Mill: RSPO Supply Chain for CPO mill, weighbridge and storage area	✓	-	-
	2000 – 2215	Audit Team travel to Kota Kinabalu via MH 2628 (KUL - BKI) & Overnight @ BKI	-	✓	✓
Wednesday 5/12/2018	0610 – 0705	Audit Team travel to Lahad Datu via & MH 3010 (BKI – LDU)	-	✓	✓
	0830 – 0900	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader • Confirmation of assessment scope and finalize • Audit plan (including stakeholder’s consultation) • Verification on previous audit findings 	✓	✓	✓
	0900 – 1230	Lahad Datu Palm Oil Mill: Inspection of 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.	✓	✓	✓
	1230 – 1330	Lunch			
	1330 – 1630	Lahad Datu Palm Oil Mill: Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities.	✓	✓	✓
	1630 – 1700	Interim Closing Briefing	✓	✓	✓

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Date	Time	Subjects	HMM	AB	MM
Thursday 6/12/2018	0830 – 1230	Gomantong Estate: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant & etc.), agrochemical mixing area, schedule waste management, worker housing, clinic, landfill & etc.	✓	✓	✓
	1030 – 1230	Meeting with stakeholders (combined with MSPO)	✓	-	-
	1230 – 1330	Lunch			
	1330 – 1630	Gomantong Estate: Document review P1 – P8: General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	✓	✓	✓
	1630 – 1700	Interim Closing Briefing	✓	✓	✓
Friday 7/12/2018	0830 – 1100	Ong Yah Ho Estate: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant & etc.), agrochemical mixing area, schedule waste management, worker housing, clinic, landfill & etc. Ong Yah Ho Estate: Document review P1 – P8: General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	✓	✓	✓
	1100 – 1230	Closing Meeting <ul style="list-style-type: none"> • Presentation of report by BSI Lead Auditor – briefing & discussion of findings • Acceptance & acknowledgement by Lahad Datu Palm Oil Mill & Estates 	✓	✓	✓
	1230 – 1400	Lunch & Friday Prayer	✓	✓	✓

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Date	Time	Subjects	HMM	AB	MM
	1615	Audit Team travel back to KL via MH 3019 (LDU – BKI) & MH 2631 (BKI – KUL)	✓	✓	✓

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- TSH Resources Berhad Multiple Management Units / Time Bound Plan
- RSPO P&C 2013 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C GA-NIWG 2017
- RSPO P&C INA-NIWG 2016
- RSPO P&C MY-NIWG 2014
- RSPO P&C PNG-NIWG 2017

3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills?	The time bound plan includes all operating units in Malaysia and Indonesia. Since joining RSPO as processor and trader on 17/11/2014, TSH Resources Bhd. (hereinafter referred to as TSH) has developed its Sustainable Palm Policy as in the Roundtable of Sustainable Palm Oil (RSPO) Manual; Doc. no.: TSHR/RSPO; Rev. no.: 1; dated 12/6/2016. For Malaysia operations, the plan was to certify Lahad Datu operating unit which was in-line with certification audit conducted on November 2016. On 2017 onwards, the plan was to certify Sabahan complex and Kunak complex on annual basis. For Indonesia operations, one unit operation, PT Sarana Multi Niaga Palm Oil Mill, has been certified since May 2016. The plan was also to certify the rest of operating units complex in Indonesia on annual basis in 2017 onwards.	Complied
Have all the estates and mills certified within five years after obtaining RSPO membership?	Certifications of all estates and mills within TSH group were in progress since obtaining of membership in November 2014.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	No any new acquisitions since the last audit	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required.	No changes for the existing TBP as well as not applicable since no new acquisitions. This is consistent with the latest ACOP reporting i.e. RSPO Annual Communications of Progress 2017	Complied

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Is this consistent with the ACOP reporting?	report. 2018 report still on-going as of the date of audit.	
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No any isolated lapses in implementation of TBP so far.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No any fundamental failure to proceed with the implementation of TBP so far.	Complied
Have there been any stakeholder comments?	No any stakeholder comments received except for sighted in records at site.	Complied
Un-Certified Units or Holdings		
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	Internal TSH competent personnel conducted Biodiversity assessment & HCV identification within Lahad Datu POM and estates landholdings. Report was prepared by the sustainability team; in-line with the report of EIA i.e. Proposed Replanting of 3007 Hectares Oil Palm Plantation at Ong Yah Ho Estate and Gomantong Estate on Land Title Nos. CL095327218 and CL095310731, in the District of Kinabatangan, Sabah. The objective of this assessment is having additional ground check on the existing identified HCV area done on 2007 in order to be detailed and accurate in database and mapping. Based on the report and evidence from on-site visit as of the audit date, no replacement were done after dates defined in Nis Criterion 7.3.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No new plantings since 2005 except for replanting activity.	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6. The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker . The progress on the Liabilities shall be verified and reported.	As of the date of the report being produced, there is no any comment by stakeholder that could be taken action by TSH. Further details please refer to the RSPO Complaints Website: http://www.rspo.org/members/status-of-complaints?keywords=TSH TSH has been submitted a total of 11 LUCA for 11 management units with potential liability. 8 LUCA review ongoing, 1 requiring clarification, 1 passed and 9 requiring clarification note as per tracker https://www.rspo.org/certification/remediation-and-compensation/racp-tracker .	Complied

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Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	Since the closure of previous findings, no stakeholder comments or complaints received.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	None noted. No stakeholder comments or complaints received.	Complied
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Prior to the certification audit, Internal Audit for Lahad Datu POM and supply base was conducted by Sustainability department, the latest internal audit was conducted on 24-26/9/2018 by QA Team for mill and both estates to cover the entire criterion stated in the standard. Periodical assessment were also planned and conducted for all operating units in both Malaysia and Indonesia. A positive assurance statement has been produced through this periodical assessment and internal audit.	Complied

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

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

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 Certification Assessment there were two (2) Minor nonconformities raised. The Lahad Datu Palm Oil Mill Certification Unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment.

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1718280-201812-N1	Clause & Category (Major / Minor)	Indicator 5.3.3 Minor
Date Issued	4/12/2018	Due Date	Next annual surveillance assessment

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Closed (Yes / No)	No	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	The evidence of diesel, lubricant and scheduled waste spillage shows the environmental improvement plan was not effectively implemented.		
Requirement Reference:	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.		
Objective Evidence:	<p>During the both estates/mill site visits at the following venues /stations it was sighted that;</p> <p>a) Mill Diesel storage tank - Diesel and lubricant oil spillage underneath.</p> <p>b) Mill Scheduled Waste store - spillage of used lubricant oil SW 305 under the storage container.</p> <p>c) OYH Estate - spillage of used lubricant oil SW 305 under the storage container.</p> <p>In the Environmental Improvement Plan, in section Waste/M/002, the objective stated 'to improve collection, segregation, storage and disposal of all scheduled waste and domestic waste. The action program stated that 'all scheduled wastes to be collected, segregated, store and disposed through the DOE licensed company.</p>		
Corrections:	To designed and install secondary containment suitable for the SW store.		
Root Cause Analysis:	The understanding that the concrete flooring and oil sump-pit was already sufficient to control & collect any spillage of oil or SW.		
Corrective Actions:	To revised the TSHR/ENV/F03 to include the secondary requirements & conduct environmental improvement training on the SW305 5S collection & storage.		
Assessment Conclusion:	CAP accepted. Effectiveness of CAP evidence to be verify in the next assessment.		

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1718280-201812-N2	Clause & Category (Major / Minor)	Indicator 2.1.3 Minor
Date Issued	4/12/2018	Due Date	Next annual surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	The clauses of the below act was not adequately addressed		
Requirement Reference:	A mechanism for ensuring compliance shall be implemented.		
Objective Evidence:	<p>Gomantong Estate:</p> <p>Lapses of the following Regulations was sighted in the legal register of Occupational Safety and Health - Classification, Labelling and Safety Data Sheet of Hazardous Chemicals) Regulations 2013 - The Agrochemicals, Lubricant and Hydraulic oil Safety and Data Sheets found at the Agrochemicals store and Workshop did not have their valid (more than 5 years old) SDS displayed.</p>		
Corrections:	To submit the chemical master-list to Purchasing Group & Store PIC for their help to on getting the revised SDS for relevant chemical.		
Root Cause Analysis:	The updated of SDS are not received regularly from supplier unless requested. There is a lapse of request for updated SDS for 2018.		

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Corrective Actions:	To update and send the chemical register annually to Purchasing Group & Store PIC for annual SDS expiry status and to get the updated copy from either supplier or manufacturer. Revised the OSH WI - THSR/OSH/WI02. Conduct training for the PIC on Jan 2019.
Assessment Conclusion:	CAP accepted. Effectiveness of CAP evidence to be verify in the next assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	Indicator 6.5.3 Details: All operating units: Company need to demonstrate its stance related to any unauthorized permanent or temporary structure constructions and renovations or extension of existing company's houses whether allowed or not.

Positive Findings	
PF #	Description
PF 1	Nil

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-Conformity			
NCR Ref #	1567675-201711-M1	Clause & Category (Major / Minor)	Indicator 2.1.1 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	01/02/2018
Statement of Nonconformity:	Some of the conditions stipulated in DOE's Jadual Pematuhan (License # 003530, validity 1/7/2017 to 30/6/2018) were not adequately fulfilled, i.e.: Condition no. 3: Takat pelepasan dan kawasan pelupusan efluen ke pengairan tanah yang dibenarkan adalah sepertimana yang ditunjukkan dalam pelan No WM/TSH/LDPOM/DOE/02/06Rev. 5 bertajuk 'General Arrangement of Extended Aerobic Biological Effluent Treatment Plant'..... Condition no. 37: Stesen pengawasan kualiti air hendaklah diadakan di hulu dan di hilir Sungai Koyah. Percontohan air hendaklah diambil sekali dalam sebulan dan laporan analisis kimia hendaklah dikemukakan. Pelan lokasi yang menunjukkan kedudukan stesen pengawasan tersebut hendaklah mendapat persetujuan daripada Jabatan Alam Sekitar Negeri Sabah.		
Requirement Reference:	Evidence of compliance with relevant legal requirements shall be available.		
Objective Evidence:	Condition no. 3: Plan drawing of the land irrigation is not accurate when compared to actual on the ground (GPS satellite image aided) Condition no. 37: The location plan of sampling stations at Koyah River upstream and downstream has yet to be agreed by the Dept. of Environment (DOE) of Sabah.		

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Corrective Actions:	<p>Condition No. 3: 1. Appoint / award the competent surveyor to update the Land Irrigation Drawing. 2. Provide Gantt Chart on the completion from the surveyor award until the get the AS Built and change in the DOE's Jadwal Pematuhan.</p> <p>Condition No. 37: 1. Submit the Letter to the DOE attached with the Map of sampling point and get the evidence of agreement of the sampling point from the DOE.</p>
Assessment Conclusion:	<p>Verification during assessment:</p> <p>This has been verified. Map TOPOGRAPHICAL SURVEY FOR EFFLUENT DISCHARGE LAND IRRIGATION SYSTEM dated M09/18. Was prepared by SMART SURVEY CONSULTANT a licensed surveyor. The drawing was approved by a certified Professional Engineer registered no C13176. Ir Azmeer Shamsuddin. The agreement by the DOE is evidenced in the current <i>Jadual Pematuhan ref no JPKKS/12/003530</i> clause no 2 stating ' <i>Semua pelepasan efluen hendaklah dilepaskan ke pengairan tanah dari Sampling point (final discharge point) sepertimana yang yang ditunjukkan dalam pelan no. WM/TSH/LDPOM/DOE/02/06Rev.5. bertajuk "General Arrangement Of Extended Aerobic Biological Effluent Treatment Plant.</i></p> <p>Thus, the implementation of the corrective action found to be effective and nonconformity remained closed.</p>

Non-Conformity			
NCR Ref #	1567675-201711-M2	Clause & Category (Major / Minor)	Indicator 5.3.1 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	01/02/2018
Statement of Nonconformity:	Expired/discarded agrochemical was not identified and documented.		
Requirement Reference:	All waste products and sources of pollution shall be identified and documented.		
Objective Evidence:	<p>Ong Yah Ho Estate</p> <p>i) Found in the chemical store, class II chemical Chlorpyrifus (termite control), manufacturing date: 31/11/12.</p> <p>ii) Expired/discarded agrochemical has not included in the document; Waste Identification and Disposal Plan, TSHR/ENV/F03 dated 30/9/15.</p>		
Corrective Actions:	The Expired/Discarded agrochemical included in the TSHR/ENV/F03, Waste Identification & Disposal Plan.		
Assessment Conclusion:	<p>Verification during assessment:</p> <p>Procedure revision (waste identification and disposal plan) was made that any expired chemicals will be disposed as SW 429. However the chemical concerned Chlorpyrifus (termite control) has been issued out to a sister company for application. The chemical has yet to be classified as expired at time of application.</p> <p>Thus, the implementation of the corrective action found to be effective and nonconformity remained closed.</p>		

Non-Conformity			
NCR Ref #	1567675-201711-M3	Clause & Category (Major / Minor)	Indicator 6.5.1 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	01/02/2018
Statement of Nonconformity:	Documentations of pay and conditions are inconsistent against each other and not fully available.		
Requirement Reference:	Documentation of pay and conditions shall be available.		
Objective Evidence:	<p>Ong Yah Ho Estate:</p> <ul style="list-style-type: none"> i) 05-3665: Harvester; Agreement date: 4/6/2016; Period: 1 year; Daily rate: RM30.80/day; the sampled contract sighted showed that there's no extension of contract despite the worker (Employee ID: 09-3665) still work for Ong Yah Ho Estate as harvester. ii) Furthermore, the payslip for the month of August and September 2017 shown the worker received his earnings in Daily, Contract, Harvesting + L/F and Holiday. However no any conditions specifying the rate of those contracts and harvesting+l/f except for daily rate only. The contract that has been signed on 4/6/2016 which specified the daily rate that does not meet National Minimum Wages Order 2016 has been expired too. 		
Corrective Actions:	Communication on the preferred procedure which the contract agreement shall be renew on yearly base to the employees on the signing date.		
Assessment Conclusion:	<p>Verification during assessment:</p> <p>Evidence found during assessment confirmed the CAP took place was effective. Interview with affected stakeholder confirm no sign of recurrence of issues shown and found.</p> <p>Thus, the implementation of the corrective action found to be effective and nonconformity remained closed.</p>		

Non-Conformity			
NCR Ref #	1567675-201711-M4	Clause & Category (Major / Minor)	Indicator 6.5.2 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	01/02/2018
Statement of Nonconformity:	Documented agreement and payment evidence on the pay slips were not in line with legal regulations (JTK Permit)		
Requirement Reference:	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.		
Objective Evidence:	<p>Lahad Datu Palm Oil Mill:</p> <p>Based on the following permits:</p> <p>Permit Wanita Bekerja Malam Seksyen 75 Ordinan Buruh (Sabah Bab 67);</p> <p>Validity period: 11/1/2017 – 10/1/2018</p>		

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	<ul style="list-style-type: none"> - written agreement by workers - agreement shall kept at work place - free rest period from work for 11 consecutive hours before allowed to reenter shift - weekly rest day no lower than 30 consecutive hours - shall not employ for > 1 month except with agreement - to pay shift allowance at rate agreed in terms and conditions or as per collective agreement - to provide free transport <p>Sampled women employee:</p> <p>i) Women Employee; ID: 0468; Agreement date: 26/7/2017; Month of Nov 2017; Time and Attendance Report - night shift work: 1-12/11/2017; 20- 30/2017</p> <p>ii) Women Employee; ID: 0150; Agreement date: 28/9/2017; Month of Nov 2017; Time and Attendance Report - night shift work: 1-12/11/2017; 20- 25/11/2017; 27/11/2017</p>
Corrective Actions:	<ol style="list-style-type: none"> 1. Provide required allowances to all women employees that involve in working at night shift. 2. Provide the Agreement Letter on working and night and the required allowances.
Assessment Conclusion:	<p>Verification during assessment:</p> <p>Evidence found during assessment confirmed the CAP took place was effective. Interview with affected stakeholder confirm no sign of recurrence of issues shown and found.</p> <p>Thus, the implementation of the corrective action found to be effective and nonconformity remained closed.</p>

Non-Conformity			
NCR Ref #	1567675-201711-M5	Clause & Category (Major / Minor)	Indicator 6.12.1 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	01/02/2018
Statement of Nonconformity:	Based on the evidence and grievance, the additional form used for the workers to fill-in when applying for leave was reflective of forced labour form.		
Requirement Reference:	There shall be evidence that no forms of forced or trafficked labour are used.		
Objective Evidence:	<p>Gomantong Estate:</p> <p>Based on the Outstanding Summary Balance (Levy) for the Month Ending November 2017 for TSH Palm Products Sdn. Bhd., the employee ID: 2572 debt Opening Nov 2017: RM359.27; Debit: Nil; Credit: RM53; Closing Nov 2017: RM306.27. The detail of Borang Meminjam Paspot was recorded in the log book of Peminjaman Paspot which claimed to be the passport movement records. Sighted also for Employee ID: 05-3665 (Isyak Nin Luguh) a letter; Surat Perjanjian Potongan Bayaran Paspot dan Hutang Tertunggak; Ref. # P-F-AD02; dated 21/1/2012 with Penjamin (Guarantor) Asuan bin Arsad being both stamp their fingerprints for "agreement" to pay RM50 to get his own passport.</p>		
Corrective Actions:	<ol style="list-style-type: none"> 1. Issuance of memo from Management to all premises to restricted of the payment / deposit upon the employees take the pasport for their own use. 2. Use of the new format of form entitled with "Rekod Pengambilan Paspot". 		
Assessment Conclusion:	Verification during assessment:		

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	<p>Evidence found during assessment confirmed the CAP took place was effective. Interview with affected stakeholder confirm no sign of recurrence of issues shown and found.</p> <p>Thus, the implementation of the corrective action found to be effective and nonconformity remained closed.</p>
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Non-Conformity			
NCR Ref #	1567675-201711-N1	Clause & Category (Major / Minor)	Indicator 4.7.3 Minor
Closed (Yes / No)	Yes	Date of nonconformity Closure	07/12/2018
Statement of Nonconformity:	Adequate and appropriate protective equipment was not made available to all workers at the place of work to cover all potentially hazardous operations.		
Requirement Reference:	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.		
Objective Evidence:	Based on site visit, there was no available PPE for boiler man and fireman at boiler station for furnace raking activity. Minimum PPE was used, i.e leather hand glove, safety boots (low cut) and safety helmet. Further check in the PPE standard and recommendation under Occupational Safety and Health Handbook – POM, TSHR/OSH/SOP05, rev: 1, 4/7/16, no specific PPE recommended for the said activity.		
Corrective Actions:	To revise the HIRADC base on the process. Then, the list/table of PPE change from activity to process in the TSHR/OSH/SOP05.		
Assessment Conclusion:	<p>Site verification showed that the Boilerman and Fireman were provided with high cut safety shoes, fire retardant jacket, face shield, safety helmet, leather gloves, ear plug, NT95 mask and full body jump suit (for major clean-up and maintenance) as per revised Work Instruction TSHR/OSH/WI dated 1.3.2018.</p> <p>Thus, the implementation of the corrective action found to be effective and Minor NC was closed on 7/12/2018.</p>		

Non-Conformity			
NCR Ref #	1567675-201711-N2	Clause & Category (Major / Minor)	Indicator 5.2.4 Minor
Closed (Yes / No)	Yes	Date of nonconformity Closure	07/12/2018
Statement of Nonconformity:	The recommended action plan in the HCV assessment report with regards to conduct study on population of RTE species and updating its status (increase or decrease) was not adequately addressed.		
Requirement Reference:	<p>Where a management plan has been created there shall be ongoing monitoring:</p> <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. 		

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Objective Evidence:	The established action plan has yet to adequately address the recommendation. There is no study of population of the identified RTE species, hence information about decreasing or increasing status was not available.
Corrective Actions:	1. Create a form relevant to the HCV assessment to monitor 14 type of species as stated in the HCV assessment dated October 2015. 2. Request wildlife department sabah to conduct the wild life warden in house training to ensure the competency of TSH warden to monitor the species in January 2018.
Assessment Conclusion:	A format has been created. Records have been formatted dated 05-06/7/18 on the wildlife monitoring for both the Estates with details provided such as info/transect point/site./pictures/findings. The report is prepared by En Mohd Azman Mabaloh (Environmental Engineer) and verified by the Estates and Manager and Senior Manager. Training has been provided on 20-21/3/18 by Wildlife Warden (Warden Kehormat Hidupan Liar) attended by 16 Executives/staff from OYH Estate Similarly a session was conducted in Gomantong Estates respectively attended by 23 personnel of various categories of employees. The wildlife department was represented by 9 people headed by En Roland Nuim. Their presence was supported by evidence provided in the visitors book. Thus, the implementation of the corrective action found to be effective and Minor NC was closed on 7/12/2018.

Opportunity for Improvement	
OFI#	Description
OFI 1	Nil

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1396353M1	Major	4.7.1	03/11/2016	Closed on 28/11/2016
1396353N1	Minor	5.3.3	03/11/2016	Closed on 15/12/2017
1567675-201711-M1	Major	2.1.1	15/12/2017	Closed 01/02/2018
1567675-201711-M2	Major	5.3.1	15/12/2017	Closed 01/02/2018
1567675-201711-M3	Major	6.5.1	15/12/2017	Closed 01/02/2018
1567675-201711-M4	Major	6.5.2	15/12/2017	Closed 01/02/2018
1567675-201711-M5	Major	6.12.1	15/12/2017	Closed 01/02/2018
1567675-201711-N1	Minor	4.7.3	15/12/2017	Closed on 7/12/2018
1567675-201711-N2	Minor	5.2.4	15/12/2017	Closed on 7/12/2018
1718280-201812-N1	Minor	5.3.3	07/12/2018	"Open"
1718280-201812-N2	Minor	2.1.3	07/12/2018	"Open"

3.5. Stakeholders Consultation

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

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



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

List of Stakeholders Contacted	
Internal Stakeholders Mill & Estate managers & asst. managers Supervisors, Staff & Clerks Mill local & foreign workers (process, workshop, etc.) Estate local & foreign workers (harvesters, sprayers, etc.) Local workers representatives Foreign workers representatives Gender committee representative Crèche minder	Union/Contractors/Local Communities Nabila Trading (Grocery Shop/Canteen Operator) Tamaco Plantation Kemajuan Bintang Mas Estate (Neighbour Estate) Linddale Sdn. Bhd. (Neighbour Estate) Millivest Sdn. Bhd. (Vendor) JC Chang Melewar Estate 1 (Neighbour Estate)
Government Departments Energy Commision Sandakan (via phone)	NGO CLC Lahad Datu POM teacher

IS #	Description
1	Feedbacks: Follow-up from last audit: Energy Commission (EC), East Coast Area, Sabah State – mill need to update on submission of the electrical single line diagram to EC in case of any changes/upgrade within mill – submission received on June 2018 and under review.
	Management Responses: Communication with EC made through monthly power generation report. No any negative feedbacks received from EC so far.
	Audit Team Findings: No further issue.
2	Feedbacks: Nabila Trading (Grocery Shop/Canteen Operator): Some foreign worker who completed their contract did not pay grocery debt before repartriating. Already discuss with management and looking for resolution.

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	<p>Management Responses: Management not allowed to deduct salary for debt payment without any permit. To seek confirmation with JTK whether such permit is allowed. Plan to visit JTK Kinabatangan office early 2019 and can broght matter to discuss as well.</p> <p>Audit Team Findings: Result of consultation with JTK will be follow-up during next assessment. For the time being, management agreed to advise all workers to pay their debts especially to grocery shop since the shop provide convenience for workers to buy food.</p>
<p>3</p>	<p>Feedbacks: Neighbour Estates (Tamaco, JC Chang & Linddale): No any issue relevant to operation and/or boundaries. Have long stand relationship as oil palm growers within same area.</p> <p>Management Responses: Positive comments noted.</p> <p>Audit Team Findings: No further issue.</p>
<p>4</p>	<p>Feedbacks: Mill Vendor: No issue in products supply pricing and payment. Has long business relationship with company for more than 10 years.</p> <p>Management Responses: Positive comments noted.</p> <p>Audit Team Findings: No further issue.</p>
<p>5</p>	<p>Feedbacks: CLC teacher: Estate managements always visits and contributes to school programs and activities. 100% of children among estate workers are schooling at CLC including from neighbour estate. School facilities were well maintained by company.</p> <p>Management Responses: Positive comments noted.</p> <p>Audit Team Findings: 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 Lahad Datu 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 Lahad Datu Palm Oil Mill Certification Unit is continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Hafriazhar Mohd Mokhtar	Name: Bruno Bangkong
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: TSH Lahad Datu Palm Oil Mill
Title: Lead Auditor	Title: Mill Manager
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 25/2/2019	Date: 6/3/2019

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Commitment to Transparency			
Criterion 1.1: Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	Information were adequately provided through the implementation of following procedures: a) Information Request; TSHR/SUST/SOP01; Rev.: 2; Effective date: 1/11/2017 b) Employee grievance; TSHR/HR/SOP06; Rev.: 0; Effective date: 12/1/2016 Based on procedures, sighted records of Stakeholder Registration Form that was used for Information Request by external stakeholders. Therein the requester shall provide information i.e - Full name - Date of request - Address/contact no/email - Business, organization representing - Reason of request/intended use of information.	Complied

Criterion / Indicator		Assessment Findings	Compliance
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	<p>Records of requests for information and the CU's responses are filed and maintained at the respective estate/mill offices. Sighted during the following;</p> <p>Lahad Datu Palm Oil Mill.</p> <ul style="list-style-type: none"> a) 18/1/18 - Lahad Datu Edible Oils Sdn Bhd. on requesting information relating to HACCP questionnaires. b) 8/8/18 – DOE taking effluent sample from final discharge. c) 7/2/18 – DOSH – machinery inspection crane PMA 94849. d) 23/3/18 - TSH Palm Product Sdn Bhd requesting for a van for special purposes. e) 28/10/18 – Small holder Tn Hj Sakka requesting EFB for their field application. f) 29/3/17 – SOCSO Program Pencegahan Advokas HSP SOCSO Tawau 2017. g) 12/7/18 – Employee Shita Mide requesting a small bridge at the housing area for convenience. h) 2/8/18 – Employee Nurlina Amir highlighting for a replacement of a safety signboard at the line site. <p>Ong Yah Ho/Gomantong Estate</p> <ul style="list-style-type: none"> a) 3/10/18 – Lindale Sdn Bhd requesting information on HCV report for both estates. b) Monthly – VMO visit requesting medical records of employees during the month. c) 13/12/17 – <i>Pejabat Kesihatan</i> officers requesting data from both estates. 	Complied
<p>Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p>			

<p>1.2.1</p>	<p>Publicly available documents shall include, but are not necessary limited to:</p> <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). <p>- Major compliance –</p>	<p>General publicly available documents sighted available such as the Annual Report 2017 and accessible for downloading its softcopy version from company’s website: http://www.tsh.com.my/annual-report-2017/.</p> <p>a) Ong Yah Ho Estate: Land title sighted available: Title no. Country Lease 095327218; Register memo no.: 20243896; dated 25/8/1998.</p> <p>b) Gomantong Estate: Land title sighted available: Title no. Country Lease 095310731; Register memo no.: 20299391; dated 9/4/2009.</p> <p>Policy had been established with procedures and policy following:</p> <ul style="list-style-type: none"> a) Transparency Policy; Doc. no.: TSHR/POL/SOP01; Rev. 0 dated 16/10/2015 b) Safety & Health Policy; Doc. no.: TSHR/POL/SOP02; Rev. 1 dated 18/10/2016 c) Equal Opportunity & Discrimination Policy; Doc. no.: TSHR/POL/SOP03; Rev. 0 dated 16/10/2015 d) Freedom of Association Policy; Doc. no.: TSHR/POL/SOP04; Rev. 0 dated 16/10/2015 e) Sexual Harassment Policy; Doc. no.: TSHR/POL/SOP05; Rev. 0 dated 16/10/2015 f) Reproductive Rights Policy; Doc. no.: TSHR/POL/SOP06; Rev. 1 dated 21/3/2016 g) Child Labour Policy; Doc. no.: TSHR/POL/SOP07; Rev. 0 dated 16/10/2015 h) Environment Policy; Doc. no.: TSHR/POL/SOP08; Rev. 0 dated 16/10/2015 <p>Other publicly available documents were sighted and available with details as reported in the each indicator of related criterion.</p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.		
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. -Minor compliance</p> <p>TSH Management established policy on Communication & Consultation and the embedment of Code of Ethics within the Group Human Resource Manual and practice covers all operations in the plantation operation. Policies displayed on the notice board and communicated to employees. Elements of ethical conducts and integrity were imbedded in all policies reviewed at operations sites.</p> <ol style="list-style-type: none"> 1. Transparency Policy Statement 2. Safety & Health Policy Statement 3. Equal Opportunity & Discrimination Policy Statement 4. Freedom of Association Policy Statement 5. Sexual Harassment Policy Statement 6. Reproductive Rights Policy Statement 7. Child Labour Policy Statement 8. Environment Policy Statement 9. Human Rights Responsible Business Policy Statement <p>Interview with employees reveal that they are aware of the policies.</p> <p>Human Rights & Responsible Business Policy; Doc. no.: TSHR/POL/SOP09 Rev. 0 dated 16/10/2015 signed by MD. Communicated through internal stakeholder meeting and assembly.</p>	Complied
Principle 2: Compliance with applicable laws and regulations		
Criterion 2.1:		
There is compliance with all applicable local, national and ratified international laws and regulations.		

<p>2.1.1</p>	<p>Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p>	<p>Lahad Datu Palm Oil Mill certification unit has demonstrated evidence of compliance with relevant legal requirements. The list of legal requirement has been identified and registered in Legal Document Master List. The list was last reviewed by the Oil Mill on 4.12.2018 and by Gomantong Estate and Ong Yah Ho Estate on 15/01/2018. The mill and estates visited has kept the set of legal requirements as hard copy and soft copy.</p> <p>The legal requirements with respect to license, permit and competent person sampled and verified found compliance at the visited operating units are as follows:</p> <p><u>Lahad Datu POM:</u> <u>Licences</u></p> <ol style="list-style-type: none"> 1. MPOB License for processing 216,000mt/year FFB (Licence No.:58717404000 validity from 01/06/2018 – 31/05/2019). 2. Ministry of Domestic Trade Cooperatives & Consumerism - Diesel storage license for 18,200 liters (KPNDKK.LDT.900.3/1 (08/2005) SK, Supplier Anikaya Sdn Bhd validity from 19/10/2018 – 18/10/2019). 3. DOE License Prescribed Premises (003530 validity from 01/07/2018 – 30/06/2019) 4. Electricity Supply Act 1990 – Licence for Private Installation, (License No. 2018/00516 valid from 22/02/2018 – 21/02/2019) 5. Labour Department – Permit Women working at night (No. 600-1/2/15/87(05/TWU/2018-069), valid from 05/04/2018 – 04/04/2020 6. Weighbridge Weights and Measures Regulations 1981 – License No. WBA (60mt) – 006776 valid from 11/06/2018 – 10/06/2019 and WBB (60mt) – 006775 from 07/09/2018 – 06/09/2019 7. POME is being applied to land. DOE final effluent discharge allowable permit no. ASSH(B)31/152/000/121 BOD, 3 DAYS 	<p>Complied</p>
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		<p>@30° C limits 20mg/l, validity 1.7.2018 to 30.6.2019. Verification of the last 5 monthly analysis (July to November 2018) final discharge point after Final Discharge Pump at Water Treated Pond showed the 7 parameters as stated in the license were below allowable limits.</p> <p><u>Sample of Equipment Certificate of Fitness or Permit:</u></p> <table border="1"> <thead> <tr> <th>Equipment</th> <th>License No.</th> <th>Issue Date</th> <th>Expiry date</th> </tr> </thead> <tbody> <tr> <td>Horizontal Sterilizer</td> <td>PMT 143755</td> <td>14.11.2017</td> <td>02.02.2019</td> </tr> <tr> <td>Horizontal Sterilizer</td> <td>PMT 143753</td> <td>14.11.2017</td> <td>02.02.2019</td> </tr> <tr> <td>Air Receiver No. 1</td> <td>PMT 105781</td> <td>23.10.2017</td> <td>11.1.2019</td> </tr> <tr> <td>Air Receiver No. 2</td> <td>SB PMT 12151</td> <td>14.11.2017</td> <td>02.02.2019</td> </tr> <tr> <td>Air Compressor</td> <td>SB PMT 10634</td> <td>26.10.2017</td> <td>11.1.2019</td> </tr> <tr> <td>Back Pressure Receiver</td> <td>PMT 143752</td> <td>14.11.2017</td> <td>02.02.2019</td> </tr> <tr> <td>Vacuum Deaerator</td> <td>PMT 143746</td> <td colspan="2">CoF Exemption C1</td> </tr> <tr> <td>Sand Filter</td> <td>SB PMT 6720</td> <td colspan="2">CoF Exemption C3</td> </tr> <tr> <td>Softener Vessel</td> <td>SB PMT 9609</td> <td colspan="2">CoF Exemption C3</td> </tr> <tr> <td>Vertical Steam Separator</td> <td>SB PMT 9608</td> <td colspan="2">CoF Exemption C5</td> </tr> <tr> <td>Boiler 1 (890 m²)</td> <td>PMD 10522</td> <td>23.10.2017</td> <td>11.1.2019</td> </tr> <tr> <td>Boiler 2 (1130 m²)</td> <td>SB PMD 2600</td> <td>28.11.2017</td> <td>6.2.2019</td> </tr> </tbody> </table> <p><u>Sample of competent person:</u></p>	Equipment	License No.	Issue Date	Expiry date	Horizontal Sterilizer	PMT 143755	14.11.2017	02.02.2019	Horizontal Sterilizer	PMT 143753	14.11.2017	02.02.2019	Air Receiver No. 1	PMT 105781	23.10.2017	11.1.2019	Air Receiver No. 2	SB PMT 12151	14.11.2017	02.02.2019	Air Compressor	SB PMT 10634	26.10.2017	11.1.2019	Back Pressure Receiver	PMT 143752	14.11.2017	02.02.2019	Vacuum Deaerator	PMT 143746	CoF Exemption C1		Sand Filter	SB PMT 6720	CoF Exemption C3		Softener Vessel	SB PMT 9609	CoF Exemption C3		Vertical Steam Separator	SB PMT 9608	CoF Exemption C5		Boiler 1 (890 m ²)	PMD 10522	23.10.2017	11.1.2019	Boiler 2 (1130 m ²)	SB PMD 2600	28.11.2017	6.2.2019	
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Type of competency	Position	Validity / Effective period
Steam Engineer Grade 2	Mill Manager	12.9.2009
Internal Combustion Engine Engineer	Mill Manager	5.2.2012
Authorised Gas Tester and Entry Supervisor for Confined Space (AGTES)	Mill Manager	21.9.2018 – 20-9.2020
Certified Environmental Professional in the Treatment of Palm Oil Mill Effluent – Pond Process	Mill Manager	Effective from 20.2.2018
Certified Environmental Professional in Scheduled Waste Management	Sustainability HOD	15.11.2018 - 14.11..2019
Authorised Entrant and Standby Person	Asst. Mill Manager	29.6.2018 – 28.6.2020
Engine Driver Grade 2 – Boiler and Steam Engines	Boilerman – 2 Nos.	20.2.2012 - 23.10.1992
Engine Driver Grade 2 – Internal Combustion Engine	ICE Engine Driver	28.3.2018
FFB Grading	Grader	13.12.2016

Gomantong Estate, Licence and Permit

1. MPOB License for Sell and Move FFB (Licence No.:60055002000 valid from 01/08/2018 – 31/07/2019).

Criterion / Indicator	Assessment Findings	Compliance
	<p>2. Ministry Domestic Trade Cooperatives & Consumerism - Diesel storage license for 18,000 liters (KPNDKK.LDT.900.3/1 (09/2005) valid from 19.10.2018 – 18.10.2019</p> <p>3. Labour Department, Licence For Employment of Foreign Workers (Section 118, Labour Ordinance (Article 67 Sabah) – Lic. No. JTK.H.K.B.N 600-4/1/01261/0100 valid from 7.8.2018 to 6.8.2019</p> <p>4. Factories and Machinery (Notification, Certificate of Fitness and Inspection) Regulation 1970 for Air Receiver PMT SB PMT 14036 valid from 18.1.2018 – 31.7.2019</p> <p><u>Ong Yah Ho Estate, Licence and Permit</u></p> <p>1. MPOB License for Sell and Move FFB (Licence No.:503443702000 valid from 01/02/2018 – 31/01/2019).</p> <p>2. Ministry Domestic Trade Cooperatives & Consumerism –</p> <p style="padding-left: 20px;">(a) Diesel storage license for 18,200 liters (KPNDKK.LDT.900.3/1 (10/2005) valid from 19.10.2018 – 18.10.2019</p> <p style="padding-left: 20px;">(b) Petrol storage licence for 200 liters 3 times per week (KPNDKK.LDT.900.3/2 (07/2018) valid from 19.10.2018 – 18.10.2019</p> <p>3. Factories and Machinery (Notification, Certificate of Fitness and Inspection) Regulation 1970 for Air Receiver PMT SB PMT 13070 valid from 22.2.2018 – 29.4.2019</p> <p>4. Labour Department, Licence For Employment of Foreign Workers (Section 118, Labour Ordinance (Article 67 Sabah) – Licence No. JTK.H.K.B.N 600-4/1/01261/0101 valid from 15.9.2018 to 14.9.2019</p>	

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Criterion / Indicator		Assessment Findings	Compliance
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	Written information for Legal and other requirements, Document No TSHR/SUST/SOP04 Rev No 2. dated 01.11.2017 was available and maintained. It includes procedure for tracking changes, implementation of changes and evaluation of compliance. The tracking of the changes to legal requirements are conducted by the respective HOD (4 departments). The Legal Master List was last was evaluated from 22 nd – 24 th October 2018 for mill and estates assessed.	Complied
2.1.3	A mechanism for ensuring compliance shall be implemented. - Minor compliance -	<p>The mechanism used to ensure compliance include assigning responsibility to Group Executive Director, General Manager, Unit Manager/Assist Manager, Environmental Officer, Safety & Health Officer, HR Personnel, PIC/Coordinator and Admin Personnel.</p> <p>All Estates and Mill maintain documented system for identifying, evaluating, reviewing and updating applicable regulations and other requirements. The legal register at all sites were updated on yearly basis / as and when needed for new updates or renewal of licenses. Refer to Legal Document Master list (Rev. no. 2; dated 15/1/2018). Further details of implementation of regulations are recorded under evaluation of legal compliance audit, TSHR/SUST/F04 dated 22nd – 24th October 2018.</p> <p>Despite the mechanism to ensure compliance a lapse at Gomantong Estate to conform to Occupational Safety and Health – Classification, Labelling and Safety Data Sheet of Hazardous Chemicals) Regulations 2013 was sighted. Thus a minor noncompliance was raised.</p> <p>The Safety and Data Sheets for Agrochemicals, Lubricant and Hydraulic oil found at the Agrochemicals store and Workshop did not have their valid SDS displayed. It is more than 5 years old.</p>	Minor nonconformance

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Criterion / Indicator		Assessment Findings	Compliance
2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance -	Mechanism to track changes in law rest with of Top management, OHS Officer, Estate/Mill Manager and sustainable personnel responsibility. This includes tracking of changes and implementation by PIC through accessing websites of the respective government department. The changes to information are then made aware to employees either via memo, training, e-mail, announcement during morning muster / briefing / meeting or combination thereof.	Complied
Criterion 2.2: The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.			
2.2.1	Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -	Land title documents sighted available as following: Ong Yah Ho Estate: Title no. Country Lease 095327218; Register memo no.: 20243896; dated 25/8/1998. Legal use condition: Agriculture (Oil Palm) Gomantong Estate: Title no. Country Lease 095310731; Register memo no.: 20299391; dated 9/4/2009. Legal use condition: Agriculture (Oil Palm)	Complied
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	Legal perimeter boundaries were visibly maintained and clearly demarcated at both estates visited. The management demarcated the boundary using concrete cylinder pegs (painted alternate red and white band) and trenches. At Ong Yah Ho Estate, sighted during site visit at boundary with 'Hutan Pertanian'. The original boundary stone was visibly maintained. Additionally, the boundary was clearly demarcated with concrete cylinder pegs and trenches. Likewise, at Gomantong Estate sighted the red and white boundary peg with Linddale Estate.	Complied

Criterion / Indicator	Assessment Findings	Compliance
2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	Complied
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	Complied
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	Complied
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	Complied
Criterion 2.3: Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.		
2.3.1	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance -	Complied

Criterion / Indicator	Assessment Findings	Compliance
2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. - Minor compliance -	Complied
2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	Complied
2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	Complied
Principle 3: Commitment to long-term economic and financial viability		
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.		

Criterion / Indicator		Assessment Findings	Compliance																								
3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -	<p>Business management plan was sighted available for period January 2018 to December 2020 covering plan all operating units at LDPOM Certification Unit.</p> <ul style="list-style-type: none"> - Company TSH Resources Berhad (Gomantong Estate) - Operating unit: TSH Palm Product Sdn. Bhd. (Ong Yan Ho Estate) & TSH Plantation Sdn Bhd (LDPOM). - Title: Long Term Project Development & Maintenance Plan (3 years) Rev no. 0 <p>This 3-year projection were prepared as guidance for future planning.</p> <p>There was no smallholders supply base at LDPOM.</p>	Complied																								
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	<p>The replanting program for the two estates is compiled as follows. The program is reviewable on an annual basis which is subject for an amendment. All figures in Hectares. It was last reviewed in Oct 2017.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Year</th> <th>Ong Yah Ho</th> <th>Gomantong</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>0</td> <td>150</td> </tr> <tr> <td>2020</td> <td>0</td> <td>192</td> </tr> <tr> <td>2021</td> <td>0</td> <td>234</td> </tr> <tr> <td>2022</td> <td>300</td> <td>0</td> </tr> <tr> <td>2023</td> <td>300</td> <td>0</td> </tr> <tr> <td>2024</td> <td>350</td> <td>0</td> </tr> <tr> <td>2025</td> <td>350</td> <td>0</td> </tr> </tbody> </table>	Year	Ong Yah Ho	Gomantong	2019	0	150	2020	0	192	2021	0	234	2022	300	0	2023	300	0	2024	350	0	2025	350	0	Complied
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<p>Principle 4: Use of appropriate best practices by growers and millers</p> <p>Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.</p>																											

<p>4.1.1</p>	<p>Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -</p>	<p>The mill operations are guided by SOP maintained by the management. The latest review dated 05/10/17 revision no 9. Among others relating to;</p> <ul style="list-style-type: none"> a) Administration <ul style="list-style-type: none"> - Store /Accounts - PPE issuance/Workers records b) Laboratory <ul style="list-style-type: none"> - Analysis methods/Laboratory equipment - Sampling point/frequency - Daily oil /kernel losses summary report c) Maintenance <ul style="list-style-type: none"> - Daily maintenance report/Monthly shutdown plan - Vehicle inspection checklist/ - Monthly maintenance report d) Biogas <ul style="list-style-type: none"> - Biogas process/Daily monitoring log - Daily pipe daily monitoring checklist e) Mill production <ul style="list-style-type: none"> - All processes from Reception/Ramp to Despatches - Water Treatment Plant/Engine/ - Boiler station data/checklist - Daily supervisor report/Daily sterilising records <p>Similarly the estates operations are guided by SOP maintained by the management. Initial date of document dated 01/7/16 and review as per section/activities requirement. Among others relating to;</p> <ul style="list-style-type: none"> a) Land Clearing & Preparation <ul style="list-style-type: none"> - Procedure - HCV /Riparian Boundary marking b) Nursery <ul style="list-style-type: none"> - Ordering planting material/Soil & manuring c) Cover crops 	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - Standards/Supply and treatment of seeds/Pest d) Planting supplies <ul style="list-style-type: none"> - Supplies and replacement e) Weeding <ul style="list-style-type: none"> - Chemical recommendations/Manual weeding f) Pruning & sanitation <ul style="list-style-type: none"> - Frond stacking placement/Pruning selection method g) FFB harvesting & Collection <ul style="list-style-type: none"> - Harvesting system and buffalo system. h) Manuring i) Replanting <ul style="list-style-type: none"> - Program/Schedule of work. 	

<p>4.1.2</p>	<p>A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -</p>	<p>The mill adopted the following practices;</p> <ul style="list-style-type: none"> a) Daily production report therein containing <ul style="list-style-type: none"> - FFB processed/Ramp balance/ - Throughput/starting & stopping time - Boiler monitoring sheet - Daily notification report – machinery status b) Monthly shutdown c) Mill summary expenditure <ul style="list-style-type: none"> - Palm oil statistics - Administration and General Charges - CAPEX expenditure d) Audit Process 1x/month e) Assistant Gen Manager visits 1x/month f) Unscheduled visit by Group Executive Director g) Government Agencies i.e. DOSH, DOE, JTK, others. <p>The estates similarly practice the following to check the implementations of procedures.</p> <ul style="list-style-type: none"> a) Daily production/work records for the core activities at the estates b) field cost book, c) chemical consumption record d) mature/immature field work program <ul style="list-style-type: none"> - fertilizer application, - herbicide spraying, - rat baiting , - Harvesting and collection of FFB. e) Unscheduled visits by Senior Manager & Gen Manager. f) Annual Plantation Advisor visit. g) Annual Agronomist visit relating to field agronomy, soil, foliar sampling & fertiliser recommendations. h) Sustainability Unit audits / visits 	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> i) Finance Internal Audit yearly. h) Government Agencies i.e. DOSH, JTK, others. 	
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	The monitoring of the SOP implementation was closely made by all levels of the supervisory personnel with records maintained and checked. Among others the records are; <ul style="list-style-type: none"> a) Daily production/work records for the core activities at the estates b) field cost book, c) chemical consumption record d) mature/immature field work program - fertilizer application, - herbicide spraying, - rat baiting , - harvesting and collection of FFB. All the above records were kept for a minimum period of 12 months.	Complied
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	The mill has records of all third party sourced FFB on daily basis. The mill is currently receives FFB from independent outside supplier and traders. All suppliers signed Letter of Declaration on Compliance to Sustainable Sourcing of FFB and ensure legality of FFB.	Complied
Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			

Criterion / Indicator	Assessment Findings	Compliance
<p>4.2.1</p>	<p>There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -</p> <p>Both estates continued to manage and improve soil fertility to a level that ensures optimal and sustained yield by monitoring the fertilizer inputs through annual fertilizer applications. The sustaining of the soil fertility is guided by the organization SOP Manuring Doc Ref No. TSHP/OPE/SOP08 dated 01/7/16 rev 0. Therein containing information on the following</p> <ul style="list-style-type: none"> a) Manuring process flow b) Manuring for mature and immature palms c) Fertiliser type/timing of application/placement d) Supervision/Assessment <p>The process of the fertilizer application follows a flow chart Fertilizer application, commencing from an agronomist visit for a leaf sampling to determine the level of nutrient therein. Thereafter the calculation will be made for an input of fertilizer to maintain/improve the nutrient at the desired level. Estates will use this input for the entire requirement in the field identified. In addition, soil sampling was also made on a 5 years cycle. The latest in being on 02/08/18-8/10/18 for both estates.</p>	<p>Complied</p>

<p>4.2.2</p>	<p>Records of fertiliser inputs shall be maintained. - Minor compliance -</p>	<p>Fertiliser application program was monitored using records like program sheets, bin cards, field cost book, Fertiliser Application monitoring forms, etc. Records of programs and applications of fertilisers were reviewed by auditors. Review of the records revealed that the actual fertilisers applied in 2018 was in line with the program. The type of fertiliser applied in the Ong Yah Ho estate 2018 as shown below;</p> <table border="1" data-bbox="1032 619 1729 1037"> <thead> <tr> <th></th> <th>Field no</th> <th>Type</th> <th>Month of Application</th> <th>Total kg/palm</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>OP 1-A</td> <td>AS</td> <td>2/5/8/11</td> <td>6.00</td> </tr> <tr> <td></td> <td></td> <td>MOP</td> <td>2/5/8/11</td> <td>4.30</td> </tr> <tr> <td></td> <td></td> <td>R Phosphate</td> <td>2/5/8/11</td> <td>1.60</td> </tr> <tr> <td></td> <td></td> <td>GML</td> <td>Sept</td> <td>2.00</td> </tr> <tr> <td></td> <td></td> <td>Borate</td> <td>May/Nov</td> <td>0.20</td> </tr> <tr> <td>2</td> <td>OP 5</td> <td>AS</td> <td>2/5/8/11</td> <td>5.0</td> </tr> <tr> <td></td> <td></td> <td>MOP</td> <td>2/5/8/11</td> <td>3.80</td> </tr> <tr> <td></td> <td></td> <td>R Phosphate</td> <td>2/5/8/11</td> <td>3.80</td> </tr> <tr> <td>3</td> <td>OP13</td> <td>Borate</td> <td>May/Nov</td> <td>0.20</td> </tr> <tr> <td></td> <td></td> <td>GML</td> <td>Sept</td> <td>2.00</td> </tr> </tbody> </table> <p>Similarly Gomantong Estate had the following data.</p> <table border="1" data-bbox="1032 1069 1729 1377"> <thead> <tr> <th></th> <th>Field no</th> <th>Type</th> <th>Month of Application</th> <th>Total kg/palm</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>OP93E</td> <td>AS</td> <td>2/5/8/11</td> <td>5.00</td> </tr> <tr> <td></td> <td></td> <td>MOP</td> <td>2/5/8/11</td> <td>3.80</td> </tr> <tr> <td></td> <td></td> <td>R Phosphate</td> <td>2/5/8/11</td> <td>1.80</td> </tr> <tr> <td></td> <td></td> <td>GML</td> <td>Sept</td> <td>2.00</td> </tr> <tr> <td></td> <td></td> <td>Borate</td> <td>May/Nov</td> <td>0.15</td> </tr> <tr> <td>2</td> <td>OP94C</td> <td>AS</td> <td>2/5/8/11</td> <td>5.00</td> </tr> <tr> <td></td> <td></td> <td>MOP</td> <td>2/5/8/11</td> <td>3.80</td> </tr> </tbody> </table>		Field no	Type	Month of Application	Total kg/palm	1	OP 1-A	AS	2/5/8/11	6.00			MOP	2/5/8/11	4.30			R Phosphate	2/5/8/11	1.60			GML	Sept	2.00			Borate	May/Nov	0.20	2	OP 5	AS	2/5/8/11	5.0			MOP	2/5/8/11	3.80			R Phosphate	2/5/8/11	3.80	3	OP13	Borate	May/Nov	0.20			GML	Sept	2.00		Field no	Type	Month of Application	Total kg/palm	1	OP93E	AS	2/5/8/11	5.00			MOP	2/5/8/11	3.80			R Phosphate	2/5/8/11	1.80			GML	Sept	2.00			Borate	May/Nov	0.15	2	OP94C	AS	2/5/8/11	5.00			MOP	2/5/8/11	3.80	<p>Complied</p>
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		3	Borate	May/Nov	0.15																																																									
			GML	Sept	2.00																																																									
4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	<p>Periodic tissue and soil sampling were carried out in Estates to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the N, C, Ca, Mg, CEC, P. The cycle is every 5 years. Results as follows for analysis made on 27/9-8/10/18 in OYH estate as follows</p> <table border="1"> <thead> <tr> <th></th> <th>PH</th> <th>N</th> <th>C</th> <th>K</th> <th>Ca</th> <th>Mg</th> <th>CEC</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>4.5</td> <td>0.2</td> <td>1.35</td> <td>1.02</td> <td>6.60</td> <td>7.24</td> <td>28.59</td> </tr> <tr> <td>2</td> <td>4.5</td> <td>0.13</td> <td>1.33</td> <td>1.25</td> <td>5.43</td> <td>9.59</td> <td>23.79</td> </tr> <tr> <td>3</td> <td>4.9</td> <td>0.28</td> <td>2.23</td> <td>1.18</td> <td>9.22</td> <td>5.15</td> <td>18.20</td> </tr> </tbody> </table> <p>The similar analysis was made for Gomantong Estate with results as follows;</p> <table border="1"> <thead> <tr> <th></th> <th>PH</th> <th>N</th> <th>C</th> <th>K</th> <th>Ca</th> <th>Mg</th> <th>CEC</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>4.8</td> <td>0.13</td> <td>1.04</td> <td>0.86</td> <td>2.37</td> <td>7.73</td> <td>10.0</td> </tr> <tr> <td>2</td> <td>5.1</td> <td>0.14</td> <td>0.61</td> <td>0.61</td> <td>4.36</td> <td>8.55</td> <td>6.29</td> </tr> </tbody> </table>					PH	N	C	K	Ca	Mg	CEC	1	4.5	0.2	1.35	1.02	6.60	7.24	28.59	2	4.5	0.13	1.33	1.25	5.43	9.59	23.79	3	4.9	0.28	2.23	1.18	9.22	5.15	18.20		PH	N	C	K	Ca	Mg	CEC	1	4.8	0.13	1.04	0.86	2.37	7.73	10.0	2	5.1	0.14	0.61	0.61	4.36	8.55	6.29	Complied
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Criterion / Indicator		Assessment Findings	Compliance																								
4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -	<p>EFB is applied at rate of 40 mt/ha as per SOP in page 5 of 23 SOP 08. The EFB application is made only in Ong Yah Ho Estate with records shown below;</p> <table border="1"> <thead> <tr> <th></th> <th>Field no</th> <th>Nov todate /mt</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>OP31</td> <td>80.04</td> <td>Field application</td> </tr> <tr> <td>2</td> <td>OP33</td> <td>2005.85</td> <td>Field application</td> </tr> <tr> <td>3</td> <td>OP32</td> <td>2259.17</td> <td>Field application</td> </tr> <tr> <td>4</td> <td>OP34</td> <td>2448.73</td> <td>Field application</td> </tr> <tr> <td></td> <td>Total</td> <td>6793.79</td> <td></td> </tr> </tbody> </table> <p>Effluent were applied in Gomantong Estate in field no OP18 & OP19.</p>		Field no	Nov todate /mt	Remarks	1	OP31	80.04	Field application	2	OP33	2005.85	Field application	3	OP32	2259.17	Field application	4	OP34	2448.73	Field application		Total	6793.79		Complied
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Criterion 4.3: Practices minimise and control erosion and degradation of soils.																											
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	Soil maps were available at all the visited estates. Based on the maps, all the soil of the estates were of mineral types. The soil series were identified as Lungmanis/Mudstone & Alluvium, Rumidi/Mudstone, sandstone & miscellaneous rocks, Kretam / Mudstone, sandstone & miscellaneous rocks at Gomantong Estate and Kinabatangan/ Alluvium, Sapi / Alluvium & peat, Lungmanis / Mudstone & Alluvium, Rumidi Mudstone, sandstone & miscellaneous rocks, Kretam / Mudstone, sandstone & miscellaneous rocks and Bidu-Bidu / Ultrabasic igneous rock at Ong Yah Ho Estate.	Complied																								

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Criterion / Indicator		Assessment Findings	Compliance
4.3.2	A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	Based on the EIA report by a consultant, there was no slope identified as >25 deg. Nonetheless, the estates have constructed terraces and stop bunds at the hilly areas as well as planting of cover crop such as Mucuna bracteata where appropriate, to minimize soil erosion, as per Land clearing & preparation SOP Doc. No. TSH/OPE/SOP01 Rev. 0), dated 01/07/2016.	Complied
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	Road maintenance program for 2018 was sighted available. About 7.5 km full grading, compacting and resurfacing was done for the internal main road; 7.6 km. for field roads and spot holes patching at roads throughout the estates.	Complied
4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -	There was no peat soil in the estates visited.	Complied
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	Not applicable as there was no peat soil at all the visited estates.	Complied
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	There was no soil classified as fragile or problematic at all the visited estates.	Complied
Criterion 4.4: Practices maintain the quality and availability of surface and ground water.			

Criterion / Indicator		Assessment Findings	Compliance
4.4.1	An implemented water management plan shall be in place. - Minor compliance -	<p>TSH is committed to maintain the quality and availability of surface and ground water. Among the water management established and implemented by the estates were protecting water course by maintaining buffer zones and rain water harvesting.</p> <p>The quality and availability of natural water resources by practicing efficient water consumption through various methods such as;</p> <ul style="list-style-type: none"> a) implementation of rain water harvest, b) construction of water gate for effective management of collection/main drain, c) establishment of <i>Mucuna bracteata</i> to prevent erosion, d) side drain at field road to control water, frond stacking, e) enhancement of ground vegetation at bare ground area. <p>The CU has also identified actions to be taken in the event of water supply shortage, though both estates received supply of piped treated water from the local state authorities for the domestic consumption. Workers quarters were provided with separate tanks for rain water harvesting. This water was used for washing purpose.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.4.2	<p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated.</p> <p>- Major compliance -</p>	<p>The CU continued to maintain the buffer zone along Sg Koyah, protecting the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The width of the buffer allocated was 20 metre and this was found to be in accordance to the standard. The estates adopted the existing Policy to maintain the buffer by restricting agrochemicals application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones.</p> <p>Based on the site visit, there was no evidence that agrochemicals application has been carried out at the area. Workers during the interview session revealed that they understood on this requirement on the buffer zone protection.</p> <p>The signboards were displayed accordingly at the site where applicable.</p>	Complied

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4.4.3	<p>Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6).</p> <p>- Minor compliance -</p>	<p>The effluent analysis is made based on the effluent final discharge sampling organized once a month by an independent accredited laboratory (DSM accreditation no. SAMM NO 812). Results sampled as shown below.</p> <table border="1"> <thead> <tr> <th></th> <th>Parameter</th> <th>DOE std</th> <th>7/7/18</th> <th>3/8/18</th> <th>8/9/18</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PH</td> <td>5.0-9.0</td> <td>7.62</td> <td>8.2</td> <td>8.22</td> </tr> <tr> <td>2</td> <td>BOD</td> <td>20</td> <td>18</td> <td>11</td> <td>18</td> </tr> <tr> <td>3</td> <td>COD</td> <td>-</td> <td>85</td> <td>146</td> <td>223</td> </tr> <tr> <td>4</td> <td>T solids</td> <td>-</td> <td>592</td> <td>958</td> <td>1422</td> </tr> <tr> <td>5</td> <td>S Solids</td> <td>200</td> <td>86</td> <td>250</td> <td>62</td> </tr> <tr> <td>6</td> <td>O & G</td> <td>20</td> <td>8.4</td> <td>11</td> <td>7.2</td> </tr> <tr> <td>7</td> <td>A Nitrogen</td> <td>150</td> <td>0.2</td> <td>0.2</td> <td>0.2</td> </tr> <tr> <td>8</td> <td>Nitrogen</td> <td>200</td> <td>0.5</td> <td>0.5</td> <td>0.5</td> </tr> </tbody> </table>						Parameter	DOE std	7/7/18	3/8/18	8/9/18	1	PH	5.0-9.0	7.62	8.2	8.22	2	BOD	20	18	11	18	3	COD	-	85	146	223	4	T solids	-	592	958	1422	5	S Solids	200	86	250	62	6	O & G	20	8.4	11	7.2	7	A Nitrogen	150	0.2	0.2	0.2	8	Nitrogen	200	0.5	0.5	0.5	Complied
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4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	<p>The mill maintained records of water consumption for the mill processing and also for the domestic waste. The consumption is being calculated over the FFB processed.</p> <p>Data for 2018 (Nov to date) as shown below.</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Water m³</th> <th>FFB mt</th> <th>Water/FFB</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>16730</td><td>11300</td><td>1.5</td></tr> <tr><td>Feb</td><td>14300</td><td>10417</td><td>1.4</td></tr> <tr><td>Mac</td><td>14310</td><td>10450</td><td>1.4</td></tr> <tr><td>April</td><td>15910</td><td>11403</td><td>1.4</td></tr> <tr><td>May</td><td>14860</td><td>10496</td><td>1.4</td></tr> <tr><td>June</td><td>12840</td><td>8755</td><td>1.5</td></tr> <tr><td>July</td><td>13380</td><td>8981</td><td>1.5</td></tr> <tr><td>Aug</td><td>14470</td><td>8175</td><td>1.8</td></tr> <tr><td>Sept</td><td>14878</td><td>9573</td><td>1.6</td></tr> <tr><td>Oct</td><td>19710</td><td>13086</td><td>1.5</td></tr> <tr><td>Nov</td><td>16790</td><td>12047</td><td>1.4</td></tr> </tbody> </table> <p>The ratio was consistent at a range between 1.4 – 1.8.</p>	Month	Water m ³	FFB mt	Water/FFB	Jan	16730	11300	1.5	Feb	14300	10417	1.4	Mac	14310	10450	1.4	April	15910	11403	1.4	May	14860	10496	1.4	June	12840	8755	1.5	July	13380	8981	1.5	Aug	14470	8175	1.8	Sept	14878	9573	1.6	Oct	19710	13086	1.5	Nov	16790	12047	1.4	Complied
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<p>Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.</p>																																																			

Criterion / Indicator		Assessment Findings	Compliance
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	<p>All estates visited continued to have in place a documented integrated pest management (IPM) system. SOP for Pest and Disease, title Leaf Pests Doc. No. P&D- SOP03-03 Rev. 03, dated 1.2.2017 was available to manage pest and disease such as leaf eating pests, rats, rhinoceros beetles, etc.</p> <p>Among the IPM established were biological control, cultural practices and chemical control. During the estate visit, it was observed that beneficial plants such as <i>Cassia cobennensis</i>, <i>Tunera subulata</i> and <i>Antigonon leptopus</i> were planted at strategic places by the roadsides or unshaded field boundaries. Their recommended planting ratio is 60:20:20 at minimum intensity of 40m/ha as per the SOP.</p> <p>Rat bait usage data monitored had shown significant reduction as none was applied in 2018 (YTD November).</p>	Complied
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	Training of those involved in IPM implementation was adequately demonstrated through training plan. Training records sighted showed IPM training at both Gomantong and Ong Yah Ho estates was conducted on 13.11.2018. Thirteen (13) employees from each estate attended the training.	Complied
Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment			

Criterion / Indicator		Assessment Findings				Compliance																																																												
4.6.1	<p>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.</p> <p>- Major compliance -</p>	<p>Justification for all pesticides used was stated in the following SOP</p> <table border="1"> <thead> <tr> <th>No</th> <th>Document No.</th> <th>Effective Date</th> <th>Title</th> </tr> </thead> <tbody> <tr> <td>.</td> <td></td> <td></td> <td></td> </tr> <tr> <td>1</td> <td>RAM-SOP01-00</td> <td>Oct 2010</td> <td>Ramet Hardening</td> </tr> <tr> <td>2</td> <td>RAM-SOP02-00</td> <td>3.12.2013</td> <td>Ramet Nursery & Field Planting</td> </tr> <tr> <td>3</td> <td>P&D –SOP01-00</td> <td>Oct 2009</td> <td>Nursery Pests</td> </tr> <tr> <td>4</td> <td>P&D –SOP02-00</td> <td>Oct 2009</td> <td>Nursery Disease</td> </tr> <tr> <td>5</td> <td>P&D –SOP03-02</td> <td>7.1.2015</td> <td>Leaf Pests</td> </tr> <tr> <td>6</td> <td>P&D –SOP04-01</td> <td>7.1.2015</td> <td>Oryctes</td> </tr> <tr> <td>7</td> <td>P&D –SOP05-01</td> <td>7.1.205</td> <td>Termite</td> </tr> <tr> <td>8</td> <td>P&D –SOP06-00</td> <td>Oct 2009</td> <td>Occasional Insect Pest</td> </tr> <tr> <td>9</td> <td>P&D –SOP07-03</td> <td>1.2.2017</td> <td>Rat</td> </tr> <tr> <td>10</td> <td>P&D –SOP08-05</td> <td>8.2.2015</td> <td>Vertebrates Pests</td> </tr> <tr> <td>11</td> <td>P&D –SOP09-02</td> <td>7.1.2015</td> <td>Ganoderma</td> </tr> <tr> <td>12</td> <td>P&D –SOP012-00</td> <td>Oct 2009</td> <td>Leaf Spots</td> </tr> <tr> <td>13</td> <td>P&D –SOP014-01</td> <td>7.1.2015</td> <td>Tirathaba</td> </tr> </tbody> </table> <p>The use of pesticide was specific to the targeted pest, weed and disease. Justification takes consideration to minimize effect on non-target species.</p>				No	Document No.	Effective Date	Title	.				1	RAM-SOP01-00	Oct 2010	Ramet Hardening	2	RAM-SOP02-00	3.12.2013	Ramet Nursery & Field Planting	3	P&D –SOP01-00	Oct 2009	Nursery Pests	4	P&D –SOP02-00	Oct 2009	Nursery Disease	5	P&D –SOP03-02	7.1.2015	Leaf Pests	6	P&D –SOP04-01	7.1.2015	Oryctes	7	P&D –SOP05-01	7.1.205	Termite	8	P&D –SOP06-00	Oct 2009	Occasional Insect Pest	9	P&D –SOP07-03	1.2.2017	Rat	10	P&D –SOP08-05	8.2.2015	Vertebrates Pests	11	P&D –SOP09-02	7.1.2015	Ganoderma	12	P&D –SOP012-00	Oct 2009	Leaf Spots	13	P&D –SOP014-01	7.1.2015	Tirathaba	Complied
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4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -	<p>Records of pesticides used for 2017 and YTD November 2018 were maintained. Sample of agrochemicals records in liter/ha sighted were as follows:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>2017</th> <th>YTD November 2018</th> </tr> </thead> <tbody> <tr> <td>Gomantong</td> <td>5.787</td> <td>5.193</td> </tr> <tr> <td>Oh Yah Ho</td> <td>3.505</td> <td>3.02</td> </tr> </tbody> </table> <p>Based on the records, the major pesticides used was glyphosate.</p>	Estate	2017	YTD November 2018	Gomantong	5.787	5.193	Oh Yah Ho	3.505	3.02	Complied
Estate	2017	YTD November 2018										
Gomantong	5.787	5.193										
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4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -	<p>The IPM implementations described in Indicator 4.5.1 are meant to minimise the use of pesticides.</p> <p>The Documented IPM procedure include:</p> <ul style="list-style-type: none"> a. Identification of pest, b. Implementation monitoring c. Biology control d. Pesticides use e. Records keeping g. IPM Training <p>There has been no prophylactic use of pesticides at the visited estates.</p>	Complied									

Criterion / Indicator	Assessment Findings	Compliance
<p>4.6.4</p>	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances.</p> <p>- Minor compliance -</p>	<p>Sighting of the Pesticides Master List dated 5/11/2018 showed that only class II, III & IV chemicals were used at the estates visited.</p> <p>Paraquat was eliminated. In its place, alternatives such as Glyphosate was used instead.</p> <p>Complied</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). - Major compliance -</p>	<p>Pesticide operators had been given training on the safe handling/application of pesticides including demonstration on the correct PPE usage as listed in the table below. Chemical Safety Data Sheet were used and explained to the participants. All precautions attached to the products were again reminded during muster call. They understood the dangers of the chemicals and the reasoning why to don the required PPE was verified by the auditor in the field during the interviews with workers.</p> <p>The course modules are as below:</p> <table border="1" data-bbox="1028 715 1823 1015"> <thead> <tr> <th rowspan="2">Course title</th> <th colspan="2">Estates</th> <th rowspan="2">Training date</th> <th rowspan="2">Attendees</th> </tr> <tr> <th>Gomant ong</th> <th>Ong Yah Ho</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Chemical Handling</td> <td></td> <td>√</td> <td>12.10.2018</td> <td>Entire</td> </tr> <tr> <td>√</td> <td></td> <td>3.10.2018</td> <td>Entire</td> </tr> <tr> <td rowspan="2">Spraying/ Chemical handling</td> <td>√</td> <td></td> <td>8.11.2018</td> <td>7</td> </tr> <tr> <td></td> <td>√</td> <td>8.11.2018</td> <td>7</td> </tr> </tbody> </table> <p>Suitable personal protective equipment and application equipment were seen provided to the operators. Example of PPE provided for specific work units were:</p> <table border="1" data-bbox="1028 1174 1803 1393"> <thead> <tr> <th>Job description</th> <th>PPE provided / Equipment provided</th> </tr> </thead> <tbody> <tr> <td>Sprayer</td> <td>Nitrile Rubber Glove, Half face respirator organic vapour mask (3M 3311-K 55), Apron, Safety Goggles, Safety boot. CKS and all types</td> </tr> </tbody> </table>	Course title	Estates		Training date	Attendees	Gomant ong	Ong Yah Ho	Chemical Handling		√	12.10.2018	Entire	√		3.10.2018	Entire	Spraying/ Chemical handling	√		8.11.2018	7		√	8.11.2018	7	Job description	PPE provided / Equipment provided	Sprayer	Nitrile Rubber Glove, Half face respirator organic vapour mask (3M 3311-K 55), Apron, Safety Goggles, Safety boot. CKS and all types	<p>Complied</p>
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Criterion / Indicator		Assessment Findings		Compliance
		Manurer	Cotton glove, Nitrile Rubber Glove, Respirator mask (N95), Apron, Safety Goggles, Safety boot Wheel barrow	
		Pre-packing fertilizer operator	Cotton glove, Nitrile Rubber Glove, Respirator mask (N95), Apron, Safety Goggles, Safety boot, Weighing scale and plastic bag.	

Criterion / Indicator	Assessment Findings	Compliance
<p>4.6.6 Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -</p>	<p>All pesticides were found stored in the respective estate’s agrochemical and fertilizer store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations.</p> <p>The stores were at all times locked and at the time of visit the store clerk was seen to unlock the pad-lock to open entrance door for auditor to inspect the store. At the entrance door poster requiring donning of PPE were visibly posted. The facility ventilation fan was found working, up-to-date chemical register, chemical hazards signage, trade and generic names, and their Safety data Sheet were available.</p> <p>With the exception that some empty agrochemical containers were recycled for premixing pesticides for onward delivery to field, the rest of the empty chemical containers were triple rinsed, pierced and stored in dedicated store in accordance to procedure TSHR/ENV/W101 r1 dated 1.11.2017. Sighted records of Gomantong Estate and it was disposed in accordance to the legal requirements through licensed contractor, Lagenda Bumimas Sdn Bhd. Details were as follows:</p> <p>Dated 28/11/2018 for SW 409; C/N no: B 003061 – empty fertilizer bags, empty pesticides containers, used PPE, discarded spray equipment, expired pesticides.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	The quantity of agrochemicals required for various field conditions were documented and justified in the SOP. The field implementation was consistent with the SOP. Application of pesticides for Pest and Disease Management was per P&D SOP 01-00 to SOP14-01 and for spraying it was per Weeding SOP - Chemical recommendations/Manual weeding. For weeding activities, knapsack spray pump and low volume CDA spray were used for selective and circle spraying	Complied
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	There was no aerial spraying observed at Ong Yah Ho and Gomantong Estate	Complied
4.6.9	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	The Lahad Datu POM complex did not associate itself with smallholders. The Ong Yah Ho and Gomantong Store Clerk, Sprayers and Manurers demonstrated knowledge and skills on pesticide handling. They understood the danger of these chemicals and were seen following the proper handling procedure, observing safety pictorial poster and PPE requirements, both at the agrochemical store and as sighted during application in the field. The latest training was carried out on 8.11.2018 on the Safe Handling of Chemical and SDS Training for the pesticide handler. Safety Data Sheet for each chemical in both Bahasa Malaysia and English was seen available in docket in the agrochemical store.	Complied

Criterion / Indicator		Assessment Findings	Compliance																
4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -	<p>Disposal of waste material is made following the company procedure i.e. "Waste Management" procedure (TSHR/ENV/SOP03, rev. 2, 4/7/2016).</p> <ul style="list-style-type: none"> a) The procedures are understood by the employees through interview sessions during the field visits. b) They were aware of the zero burning policy and indiscriminate dumping of solid wastes. c) Management of waste material disposal such as empty chemical containers as in accordance with scheduled waste and domestic waste regulations and guidelines. Prior to disposal, chemical containers are triple rinsed in accordance to the established working instruction entitled "Triple Rinse" (TSHR/ENV/WI01, rev. 1, 1/11/2017). d) Collection of scheduled waste is made by M/s <i>Legenda Bumimas Sdn Bhd</i> in Telipuk <i>Sabah</i> a DOE licensed contractor. Details of collection as given below; <table border="1" data-bbox="1025 944 1823 1093"> <thead> <tr> <th></th> <th>Estate/Mill</th> <th>SW disposed</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>LDPOM</td> <td>SW 305/409/322/102</td> <td>28/11/18</td> </tr> <tr> <td>2</td> <td>Gomantong</td> <td>SW409/102/410/305</td> <td>28/11/18</td> </tr> <tr> <td>3</td> <td>Ong Yah Ho</td> <td>SW409/102/410/305</td> <td>28/11/18</td> </tr> </tbody> </table>		Estate/Mill	SW disposed	Date	1	LDPOM	SW 305/409/322/102	28/11/18	2	Gomantong	SW409/102/410/305	28/11/18	3	Ong Yah Ho	SW409/102/410/305	28/11/18	Complied
	Estate/Mill	SW disposed	Date																
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3	Ong Yah Ho	SW409/102/410/305	28/11/18																
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	<p>Specific annual medical surveillance record (8) sprayers, (17) manurers, store keeper at both Ong Yah Ho and Gomantong estates was conducted together on 17.8.2018 by OHD DOSH Reg. No. JKPP HQ/08/DOC/00/167 from DAB OH Sdn. Bhd.</p> <p>Results of the Medical Examinations showed all workers were normal without any health detrimental issues and were fit to work.</p>	Complied																

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Criterion / Indicator		Assessment Findings	Compliance
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	Besides the annual medical surveillance, additional Medical screening for woman workers involved in chemical handling and application was conducted on monthly basis. Latest medical screening was conducted on 4/9/2018, 23/10/2018 and 8/11/2018 and none was found pregnant.	Complied
Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:			

<p>4.7.1</p>	<p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. - Major compliance -</p>	<p>The established Occupational Safety & Health (OSH) Policy was sighted displayed at both Gomantong and Ong Yah Ho offices. The policy dated 6.10.2015, signed by Dato’ Tan Aik Sim, Managing Director of TSH was communicated to the employees via training and briefing. In line with the established policy, OSH plan was verified at the visited mill and estates.</p> <p>The health and safety plan documented, implemented and monitored, among others, include:</p> <ul style="list-style-type: none"> • establishing OSH Committee and the functioning of the Committee. See criterion 4.7.4; • establishing of OSH objectives and monitoring of Safety Performance; • HIRADC review, that is, all operations being risk assessed and control as per established SOP. See criterion 4.7.2; • Establishing and updating OSH Legal and Other Requirement Register and annual evaluation of its compliance. See criterion 2.1.1 and 2.1.3; • OSH training including ERP. See criterion 4.8.2; • Workplace accident notification and reporting. See 4.7.5; • Posting of Protective Personal Equipment (PPE) – see criterion 4.7.3; Electrical Danger Signages and simplified SOP at work stations. • Annual Audiometric test; • Medical Surveillance; • Chemical Health and Risk Assessment; <p>The plan effectiveness was monitored at various intervals, for example:</p> <ul style="list-style-type: none"> • daily for safety performance scoreboard and wearing of PPE, • monthly as in monitoring of OSH objectives, targets and programmes and female sprayers’ pregnancy test, 	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> • 3-monthly as in OSH Committee meeting and Workplace Inspection, • annually, in the instance of <ul style="list-style-type: none"> (a) <u>Audiometric Surveillance for mill personnel</u> Latest test was conducted at POM on 9/10/2018. From 27 workers tested, 3 were identified with hearing impairment and required retest that has been scheduled on January 2019. See Audiometric Report dated 15/10/2018. JKKP 7 form was submitted to DOSH on 16/10/2018. (b) <u>Medical Surveillance for mill personnel</u> Latest Medical Surveillance was conducted by DAB OH Sdn. Bhd., registered OSH doctor no. OHD/18/DOC/00/00201 on 9/10/2018. 6 workers were examined, 5 were declared fit to work while 1 was recommended to be given alternative work due to fatty liver disease. Refer report no. dated 19/10/2018. (c) <u>Medical Surveillance for Gomantong and Ong Yah Ho estate workers</u> Latest medical surveillance was conducted on 17/8/2018 by DAB OH Sdn. Bhd. 17 persons were examined and all were found fit to work as sprayers; and (d) evaluation of compliance to Legal and Other requirements; and • 5-yearly renewal assessment in the case of Chemical Health and Risk Assessment done on 8.11.2018. 	

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.2</p>	<p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. - Major compliance -</p> <p>All operations where health and safety is an issue has been risk assessed, and procedures and actions were documented and implemented to address the identified issues. Refer Hazard Identification, Risk and Determining Control (HIRADC) doc. no. TSHR/OSH/SOP01 dated 1/9/2015.</p> <p>The risk assessment uses HIRADC form, TSHR/OSH/F01. Example of HIRARC reviewed</p> <p>a. at the Lahad Datu POM:</p> <ul style="list-style-type: none"> i) Maintenance and servicing – pump, screw conveyor, ii) Welding and oxy- cutting job, iii) Sterilizer – operation, cages handling, iv) Boiler house – confine space entry and maintenance, clinker raking activities, v) Engine room operation and maintenance, vi) Working at height. <p>b. at the estates</p> <ul style="list-style-type: none"> i) Pesticides spraying, ii) Manuring, iii) Harvesting process, iv) FFB loading and collection at field, v) Rat baiting <p>Schedule review of HIRADC Register was at a minimum once every 2 years or after an occurrence of any accident whichever comes first. Latest review was conducted on 23/11/2018.</p>	<p>Complied</p>

<p>4.7.3</p>	<p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. - Minor compliance -</p>	<p>All workers involved at mill and estates had been adequately trained in safe working practices such as Awareness and topic specific task SOP. The objective was to ensure all workers involved have been adequately trained in identifying workplace hazards, understanding SDS, safe working practices and the correct use of PPE.</p> <p>PPE standard and recommendation was based on Occupational Safety and Health Handbook – POM, TSHR/OSH/SOP05, rev: 1, 4/7/16 and Occupational Safety and Health Handbook – Plantation, TSHR/OSH/SOP04, rev: 1, 4/7/16, and CHRA Report. The requirement for wearing PPE has also been discussed for chemical sprayers, manure and pre-packing fertilizer operator under criterion 4.6.5 above. List of PPE required based on other activities or hazard exposure are as shown below:</p> <table border="1" data-bbox="1028 847 1718 1398"> <thead> <tr> <th data-bbox="1028 847 1382 879">Hazard</th> <th data-bbox="1382 847 1718 879">PPE required</th> </tr> </thead> <tbody> <tr> <td data-bbox="1028 879 1382 1011">Flying dust and particulate from work activity such as grinding, blasting, drilling, raking</td> <td data-bbox="1382 879 1718 1011">Face shield, safety goggles, masks</td> </tr> <tr> <td data-bbox="1028 1011 1382 1241">Expose to chemicals from work activity at laboratory, spraying of pesticides, manuring</td> <td data-bbox="1382 1011 1718 1241">Nitrile rubber glove, respirators (N95/organic vapour cartridge, safety goggles), lab coat, long sleeve shirts and long pants, wellington boot</td> </tr> <tr> <td data-bbox="1028 1241 1382 1398">High noise from work activity such as drilling, cutting using grinder, steam engine or generator set operations.</td> <td data-bbox="1382 1241 1718 1398">Ear plug.</td> </tr> </tbody> </table>	Hazard	PPE required	Flying dust and particulate from work activity such as grinding, blasting, drilling, raking	Face shield, safety goggles, masks	Expose to chemicals from work activity at laboratory, spraying of pesticides, manuring	Nitrile rubber glove, respirators (N95/organic vapour cartridge, safety goggles), lab coat, long sleeve shirts and long pants, wellington boot	High noise from work activity such as drilling, cutting using grinder, steam engine or generator set operations.	Ear plug.	<p>Complied</p>
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		<table border="1" data-bbox="1032 363 1720 459"> <tr> <td>Hot surfaces from welding, oxy-cutting, raking of boiler ashes</td> <td>Leather glove, apron, goggles, welding face shield</td> </tr> </table> <p>The following trainings given to employees were recorded as follows. Subjects extracted were mainly related to ESH, SOPs, and pesticide handlings.</p> <p><u>Lahad Datu POM</u></p> <table border="1" data-bbox="1032 687 1700 1225"> <thead> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>1/11/18</td> <td>Safety at workplace</td> <td>entire</td> </tr> <tr> <td>2</td> <td>27/9/18</td> <td>HIRARC</td> <td>7</td> </tr> <tr> <td>3</td> <td>1/12/18</td> <td>Fire fighting – ERP</td> <td>Entire</td> </tr> <tr> <td>4</td> <td>17/11/18</td> <td>PPE Adherence</td> <td>10</td> </tr> <tr> <td>5</td> <td>2/11/18</td> <td>Safety aspects FFB grading</td> <td>8</td> </tr> <tr> <td>6</td> <td>2/8/18</td> <td>Boiler practices and operations</td> <td>8</td> </tr> <tr> <td>7</td> <td>2/8/18</td> <td>Workshop operations</td> <td>11</td> </tr> <tr> <td>8</td> <td>16&24/8/18</td> <td>Chemical handling</td> <td>8</td> </tr> <tr> <td>9</td> <td>1/3/18</td> <td>Safety work procedure</td> <td>Entire</td> </tr> <tr> <td>10</td> <td>2/6/18</td> <td>Hearing Conservation</td> <td>17</td> </tr> <tr> <td>11</td> <td>2/8/18</td> <td>Boiler practices and operations</td> <td>8</td> </tr> <tr> <td>12</td> <td>23/2/18</td> <td>Power plant operations</td> <td>7</td> </tr> </tbody> </table>	Hot surfaces from welding, oxy-cutting, raking of boiler ashes	Leather glove, apron, goggles, welding face shield		Date	Subject	Attendees	1	1/11/18	Safety at workplace	entire	2	27/9/18	HIRARC	7	3	1/12/18	Fire fighting – ERP	Entire	4	17/11/18	PPE Adherence	10	5	2/11/18	Safety aspects FFB grading	8	6	2/8/18	Boiler practices and operations	8	7	2/8/18	Workshop operations	11	8	16&24/8/18	Chemical handling	8	9	1/3/18	Safety work procedure	Entire	10	2/6/18	Hearing Conservation	17	11	2/8/18	Boiler practices and operations	8	12	23/2/18	Power plant operations	7	
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Gomantong Estate			
	Date	Subject	Attendees
1	9/12/17	Safety manuring & spraying	Entire
2	24/5/18	No open burning adherence	Entire
3	21/8/18	Safe tractor driving	Entire
4	22/9/18	Harvesting & collection	11
5	3/10/18	Chemical handlings	Entire
6	8/11/18	PPE adherence	Entire
7	19/11/18	Manuring and spraying	Entire
8	22/11/18	Harvesting SOP	Entire
9	28/11/18	Pre mixed procedure and guidelines.	Entire
10	3/12/18	Safety & Health briefing	Entire
11	26/10/18	Scheduled Waste Management	Entire
Ong Yah Ho Estate			
	Date	Subject	Attendees
1	27/7/18	No open burning adherence	Entire
2	22/8/18	Safe tractor driving	Entire
3	22/9/18	Harvesting & collection	11
4	12/10/18	Chemical handlings	Entire
5	22/10/18	Scheduled waste management	Entire
6	10/11/18	Manuring and spraying	Entire

Criterion / Indicator		Assessment Findings				Compliance
		7	11/11/18	PPE adherence	Entire	
		8	15/11/18	Harvesting SOP	Entire	
		9	2/12/18	Safety & Health briefing	Entire	
		10	9/12/17	Safety manuring & spraying	Entire	
		11	26/10/18	Triple rinsing	5	

<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. - Major compliance -</p>	<p>An OSH Committee is tasked with responsibilities on OSH issues at the operating unit. It is led by the most senior Manager at each operating unit assisted by the appointed Person In Charge or Coordinator. Their organization structure is as follows:</p> <p>Lahad Datu Palm Oil Mill SHC organization chart effective 17/10/2018 i) Chairman – Mill Manager ii) Secretary – Asst. Chief Clerk iii) Safety PIC – Asst. Mill Engineer iv) Eight representatives each from employer and from employee</p> <p>Ong Yah Ho and Gomantong Estate (Combined OSH Committee). Refer to OSH committee organization chart dated 12/11/18. i) Chairman: Senior Estate Manager, Ong Yah Ho: ii) Deputy Chairman: Estate Manager, Gomantong iii) SHC secretary: RSPO Coordinator iii) Safety Coordinator (Ong Yah Ho) : RSPO Coordinator iv) Safety Coordinator (Gomantong): RSPO Coordinator v) Seven representatives from employer and ten from employee</p> <p>The committee met quarterly as tabulated below. Viewing the minutes of meeting, issues discussed include employees’ safety, health and welfare, accident statistic, workplace inspection and action taken from previous workplace inspection report, legal compliance, safety and health training, etc.</p> <table border="1" data-bbox="1025 1267 1682 1396"> <thead> <tr> <th></th> <th colspan="4">Meeting dates</th> </tr> <tr> <th>Meeting No.</th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> </tr> </thead> <tbody> <tr> <td>LDPOM</td> <td>28/2/18</td> <td>31/5/18</td> <td>30/8/18</td> <td></td> </tr> </tbody> </table>		Meeting dates				Meeting No.	1	2	3	4	LDPOM	28/2/18	31/5/18	30/8/18		<p>Complied</p>
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Criterion / Indicator		Assessment Findings					Compliance
		Combined Ong Yah Ho and Gomantong	8/3/18	29/6/1 8	27/9/1 8		

<p>4.7.5</p>	<p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. - Minor compliance -</p>	<p>The certification unit continued to use the established Emergency Preparedness and Response Procedure, TSHR/OSH/SOP06 dated 4/7/2016. The procedure including accident reporting has been communicated to employees, contractors and visitors. Interviews with employees showed that they know who to contact during emergency. Emergency contact number were seen available at notice board of offices visited and also verified during interviews made known to employees at the POM and those working in the field.</p> <p>List of credible emergency scenarios foreseeable to occur at the mill and estates documented are as follows: i) Accident/Incident involving human ii) Fire/Explosion Action Plan iii) Hazardous Material Spillage (chemical/Scheduled Wastes) iv) Effluent Overflow/Major Spillage v) CPO Spillage</p> <table border="1" data-bbox="1028 943 1823 1209"> <thead> <tr> <th>Site</th> <th>Drill date</th> <th>Evacuation time, mins</th> <th>Type of drill</th> </tr> </thead> <tbody> <tr> <td>LDPOM</td> <td>1.8/2018</td> <td>5</td> <td>Building evacuation and Fire drill</td> </tr> <tr> <td>Gomantong Estate</td> <td>30.10.2018</td> <td>7</td> <td>Building evacuation and Fire drill</td> </tr> <tr> <td>Ong Yah Ho</td> <td>26.10.2018</td> <td>8</td> <td>Building evacuation and Fire drill</td> </tr> </tbody> </table> <p>First aid box was sighted present at various places in the mill and with each mandore in the field. Assigned operatives were trained in First Aid. The latest training was on 12/11/28, conducted by Cert Academy Sdn Bhd. The operatives comprised of clerks, supervisors, mandores and/or selected workers. 7, 16 and 16 personnel were</p>	Site	Drill date	Evacuation time, mins	Type of drill	LDPOM	1.8/2018	5	Building evacuation and Fire drill	Gomantong Estate	30.10.2018	7	Building evacuation and Fire drill	Ong Yah Ho	26.10.2018	8	Building evacuation and Fire drill	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<p>nominated trained as first aider respectively from LDPOM, Gomantong estate and Ong Yah Ho estate.</p> <p>Records of all accidents is kept and periodically reviewed. For annual accident statistic, JKPP 8 form for preceding year was submitted to DOSH on 31.1.2018</p>	
4.7.6	<p>All workers shall be provided with medical care, and covered by accident insurance.</p> <p>- Minor compliance -</p>	<p>All workers, local and foreign, were provided with medical care, and covered by SOCSO and accident insurance respectively. For local, Social Security contribution paid on month basis via form 8A, payment schedule. Verified payment schedule for November 2017 for 37 staff and workers.</p> <p>For foreign workers insurance they were covered under Allianz General Insurance, sampled policy # 17PTW5003289-01 for four workers - passport# B135172, B1351732, B1351742 and B443192 for period of coverage from 13.9.2018 to 12.9.2019; and policy# 17PTW5004239-01, for seven workers - passport # B7881783, B7881784, B7881786, B7967765, C0804426 and C0804406 for period of coverage from 13.12.2018 to 12.12.2019.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance								
4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	<p>All the injuries were recorded using the Total Accident/Incidents with and without lost days report. The statistics for 2018 year-to date is as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>LDPOM</th> <th>Gomantong</th> <th>Ong Yah Ho</th> </tr> </thead> <tbody> <tr> <td>2018 to date</td> <td>Zero Case (Zero LTI)</td> <td>5 Cases (6 LTI)</td> <td>8 Cases (25 LTI)</td> </tr> </tbody> </table> <p>*LTA/LTI is equivalent to lost mandays</p>		LDPOM	Gomantong	Ong Yah Ho	2018 to date	Zero Case (Zero LTI)	5 Cases (6 LTI)	8 Cases (25 LTI)	Complied
	LDPOM	Gomantong	Ong Yah Ho								
2018 to date	Zero Case (Zero LTI)	5 Cases (6 LTI)	8 Cases (25 LTI)								
<p>Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.</p>											

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<p>4.8.1</p>	<p>A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. - Major compliance -</p>	<p>The CU established a <i>Training Procedure: TSHR/TD/SOP3 Rev. 0, dated 1/1/2016</i>. The training program subjects comprises of the following sections of the mill operations</p> <table border="1" data-bbox="1025 483 1827 1385"> <thead> <tr> <th></th> <th>Training Program</th> <th>Target Group</th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td></td> <td>Environmental</td> <td></td> <td></td> </tr> <tr> <td>1</td> <td>Induction Program</td> <td>All</td> <td>Monthly</td> </tr> <tr> <td>2</td> <td>RSPO</td> <td>All</td> <td>Once</td> </tr> <tr> <td>3</td> <td>Environmental SOP</td> <td>All</td> <td>Once</td> </tr> <tr> <td>4</td> <td>EQA 1974 Compliance</td> <td>Exec/staff</td> <td>Once</td> </tr> <tr> <td>5</td> <td>HCV/EIA</td> <td>Mgr/Exec/staff</td> <td>Once</td> </tr> <tr> <td>6</td> <td>Scheduled Waste</td> <td>Mgr/Exec/staff</td> <td>Once</td> </tr> <tr> <td></td> <td>Human Resource</td> <td></td> <td></td> </tr> <tr> <td>7</td> <td>Domestic Inquiry</td> <td>All</td> <td>Once</td> </tr> <tr> <td>8</td> <td>Sabah Labour Ordinance</td> <td>Mgr/Clerk</td> <td>Once</td> </tr> <tr> <td>9</td> <td>Employees grievance</td> <td>Mgr</td> <td>Once</td> </tr> <tr> <td>10</td> <td>Quality</td> <td></td> <td></td> </tr> <tr> <td>11</td> <td>Internal Audit</td> <td>Mgr/Exec/Staff</td> <td>Once</td> </tr> <tr> <td>12</td> <td>RSPO SCC</td> <td>Exec</td> <td>Once</td> </tr> <tr> <td>13</td> <td>Quality Awareness</td> <td>all</td> <td>Once</td> </tr> <tr> <td></td> <td>Mill training</td> <td></td> <td></td> </tr> <tr> <td>14</td> <td>Policies briefing</td> <td>All</td> <td>Once</td> </tr> <tr> <td>15</td> <td>Process station</td> <td>All</td> <td>2x</td> </tr> <tr> <td>16</td> <td>Safe handling of chemical</td> <td>Exec/Workers</td> <td>Once</td> </tr> <tr> <td>17</td> <td>PPE adherence</td> <td>Exec/Workers</td> <td>Once</td> </tr> <tr> <td>18</td> <td>HIRADC</td> <td></td> <td>Once</td> </tr> <tr> <td>19</td> <td>First Aid & CPR skills</td> <td>All</td> <td>Once</td> </tr> <tr> <td>20</td> <td>Confined space</td> <td>Exec/Workers</td> <td>Once</td> </tr> </tbody> </table>		Training Program	Target Group	Frequency		Environmental			1	Induction Program	All	Monthly	2	RSPO	All	Once	3	Environmental SOP	All	Once	4	EQA 1974 Compliance	Exec/staff	Once	5	HCV/EIA	Mgr/Exec/staff	Once	6	Scheduled Waste	Mgr/Exec/staff	Once		Human Resource			7	Domestic Inquiry	All	Once	8	Sabah Labour Ordinance	Mgr/Clerk	Once	9	Employees grievance	Mgr	Once	10	Quality			11	Internal Audit	Mgr/Exec/Staff	Once	12	RSPO SCC	Exec	Once	13	Quality Awareness	all	Once		Mill training			14	Policies briefing	All	Once	15	Process station	All	2x	16	Safe handling of chemical	Exec/Workers	Once	17	PPE adherence	Exec/Workers	Once	18	HIRADC		Once	19	First Aid & CPR skills	All	Once	20	Confined space	Exec/Workers	Once	<p>Complied</p>
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			Estate Training		
		22	FFB checker	Exec/staff/Workers	Once
		23	Triple rinsing	Exec/staff/Workers	Once
		24	No open burning	Exec/staff/Workers	Once
		25	ERT Flood, fire,	Exec/staff/Workers	Once
		26	Plantation SOP	Exec/staff/Workers	Once
		27	Estate operations	All	2x
		28	Harvesting	Exec/staff/Workers	4x
		30	PPE	Exec/staff/Workers	Once
		31	Ergonomic & manual handling	All	Once
			Safety & Heath		
		32	Forklift & shovel safety	Staff/worker	Once
		33	Safety in FFB grading area	All	Once
		34	Preventive maintenance	Exec/Workshop	Once
		35	In house confined space	Exec/workshop	Once
		36	Fire drill system	All	Once
		37	Shovel crane skill & safety	Staff/workers	Once
		38	Process WI	All	2x
		39	FFB Quality for stakeholders.	Exec/stakeholders	once
Resource established since April 2015 covering all operations and level of employment within the group including RSPO requirements.					

Criterion / Indicator	Assessment Findings	Compliance
	Training attendance form used as record (TSHR/TD/F01 Training Scheduled (Objective and Target) was established. Awareness and training programs had been made. Details as provided in 4.8.2	

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<p>4.8.2</p>	<p>Records of training for each employee shall be maintained. - Minor compliance -</p>	<p>Records have been established. Details among others as listed below; a) Lahad Datu Palm Oil Mill</p> <table border="1" data-bbox="1025 491 1827 1356"> <thead> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>12/7/18</td> <td>Sexual harassment guidelines</td> <td>7</td> </tr> <tr> <td>2</td> <td>12/7/18</td> <td>Communication and consultations</td> <td>7</td> </tr> <tr> <td>3</td> <td>8/10/18</td> <td>Personnel file of workers - system</td> <td>3</td> </tr> <tr> <td>2</td> <td>1/11/18</td> <td>Safety at workplace</td> <td>entire</td> </tr> <tr> <td>3</td> <td>25/10/18</td> <td>RSPO & SC Refresher</td> <td>6</td> </tr> <tr> <td>4</td> <td>24/10/18</td> <td>OSH policy</td> <td>3</td> </tr> <tr> <td>5</td> <td>22/12/17</td> <td>Night shift briefing</td> <td>1</td> </tr> <tr> <td>6</td> <td>27/9/18</td> <td>Induction program FW</td> <td>1</td> </tr> <tr> <td>7</td> <td>12/12/17</td> <td>RSPO/MSP0 for contractors/vendors</td> <td>12</td> </tr> <tr> <td>8</td> <td>22/10/18</td> <td>Environmental Policy /SOP</td> <td>6</td> </tr> <tr> <td>9</td> <td>23/10/18</td> <td>EIA – Aspect & Impact</td> <td>5</td> </tr> <tr> <td>10</td> <td>12/11/18</td> <td>New DOE standard</td> <td>3</td> </tr> <tr> <td>11</td> <td>27/9/18</td> <td>GHG calculation</td> <td>1</td> </tr> <tr> <td>12</td> <td>20/3/18</td> <td>Wildlife Awareness /Requirement</td> <td>Entire</td> </tr> <tr> <td>13</td> <td>27/9/18</td> <td>HIRARC</td> <td>7</td> </tr> <tr> <td>14</td> <td>1/12/18</td> <td>Fire fighting – ERP</td> <td>Entire</td> </tr> <tr> <td>15</td> <td>17/11/18</td> <td>PPE Adherence</td> <td>10</td> </tr> <tr> <td>16</td> <td>2/11/18</td> <td>Process parameters</td> <td>3</td> </tr> <tr> <td>17</td> <td>2/11/18</td> <td>Safety aspects FFB grading</td> <td>8</td> </tr> <tr> <td>18</td> <td>2/11/18</td> <td>Mill shovel/engine driver</td> <td>3</td> </tr> </tbody> </table>		Date	Subject	Attendees	1	12/7/18	Sexual harassment guidelines	7	2	12/7/18	Communication and consultations	7	3	8/10/18	Personnel file of workers - system	3	2	1/11/18	Safety at workplace	entire	3	25/10/18	RSPO & SC Refresher	6	4	24/10/18	OSH policy	3	5	22/12/17	Night shift briefing	1	6	27/9/18	Induction program FW	1	7	12/12/17	RSPO/MSP0 for contractors/vendors	12	8	22/10/18	Environmental Policy /SOP	6	9	23/10/18	EIA – Aspect & Impact	5	10	12/11/18	New DOE standard	3	11	27/9/18	GHG calculation	1	12	20/3/18	Wildlife Awareness /Requirement	Entire	13	27/9/18	HIRARC	7	14	1/12/18	Fire fighting – ERP	Entire	15	17/11/18	PPE Adherence	10	16	2/11/18	Process parameters	3	17	2/11/18	Safety aspects FFB grading	8	18	2/11/18	Mill shovel/engine driver	3	<p>Complied</p>
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		19	2/8/18	Boiler practices and operations	8	
		20	2/8/18	Workshop operations	11	
		21	2/6/18	Hearing Conservation	17	
		22	1/6/18	First Aid	Entire	
		23	16&24/8/18	Chemical handling	8	
		24	1/3/18	Safety work procedure	Entire	
		25	21/11/17	Security on despatch	4	
		26	23/2/18	Power plant operations	7	
		27	15/11/18	RSPO/MSPO briefing - stakeholders	100	
		b) Gomantong Estate				
			Date	Subject	Attendees	
		1	3/12/18	Safety & Health briefing	Entire	
		2	30/11/18	MSPO/RSPO /Best practices	Entire	
		3	27/11/18	Sexual harassment guidelines	Entire	
		4	22/11/18	Harvesting SOP	Entire	
		5	19/11/18	Manuring and spraying	Entire	
		6	15/11/18	Workers grievance	Entire	
		7	12/11/18	Housing facilities & hygiene	Entire	
		8	8/11/18	PPE adherence	Entire	
		9	31/10/8	Sustainability understanding	Entire	
		10	30/10/18	Human Rights	Entire	
		11	27/10/18	Environmental Care and Procedures	Entire	
		12	25/10/18	Policies briefing	Entire	
		13	18/10/18	Scheduled waste management	Entire	

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		14	3/10/18	Chemical handlings	Entire
		15	21/8/18	Safe tractor driving	Entire
		16	24/5/18	No open burning adherence	Entire
		17	04/4/18	Recycling concept /procedures	Entire
		18	9/12/17	Safety manuring & spraying	Entire
		19	28/11/18	Pre mixed procedure and guidelines.	Entire
		20	8/11/18	Child labour /sexual harassment	Entire
		21	23/10/18	Domestic waste management	Entire
		22	23/10/18	SW briefing	Entire
		23	29/8/18	OSH committee guidelines	11
		24	13/11/18	IPM management	13
		25	14/9/18	Buffalo vaccine guidelines	9
		26	11/1/18	HCV briefing	12
		27	12/11/18	First Aid Training	16
		28	22/9/18	Harvesting & collection	11
		29	8/11/18	Spraying /chemical handlings	7
a) Ong Yah Ho Estate					
			Date	Subject	Attendees
		1	2/8/18	Safety & Health briefing	Entire
		2	28/6/18	MSPO/RSPO /Best practices	Entire
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		4	15/11/17	Harvesting SOP	Entire

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Criterion / Indicator		Assessment Findings				Compliance
		5	10/11/17	Manuring and spraying	Entire	
		6	15/9/18	Workers grievance	Entire	
		7	22/10/18	Housing facilities & hygiene	Entire	
		8	11/10/18	PPE adherence	Entire	
		9	30/10/18	Fire drill & evacuation	Entire	
		10	26/10/18	Fire drill & evacuation	Entire	
		11	28/2/18	Environmental Care and Procedures	Entire	
		12	28/6/18	Policies briefing	Entire	
		13	22/10/18	Scheduled waste management	Entire	
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		26	8/11/18	Spraying /chemical handlings	7	

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

Criterion / Indicator	Assessment Findings	Compliance
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.		

<p>5.1.1</p>	<p>An environmental impact assessment (EIA) shall be documented. - Major compliance -</p>	<p>The CU has established its environmental aspects / impacts register associated with their activities. Environmental aspect and impact (EAI) which covers from upstream activities such as FFB reception until downstream processes was sighted during assessment. Identification and evaluation of environmental impact was completed for all activities and processes related to the mill operation. Environmental Impact Assessment studies were conducted in October and November 2015. The report entitled "Proposed Replanting of 3007 Hectares Oil Palm Plantation at Ong Yah Ho Estate and Gomantong Estate", on Land Title Nos. CL095327218 and CL095310731, in the District of Kinabatangan, Sabah by TSH Resources Berhad. EIA studies were done and reported by Kiwiheng Environmental Consultants Sdn. Bhd. dated March 2016 has been properly maintained for reference.</p> <p>The Environment Aspect and Impact Assessment [TSHR/ENV/SOP04. rev. 0, 1/9/2015] is made through utilization of the following forms:</p> <ul style="list-style-type: none"> a) Environmental Aspect and Impact Assessment Sheet [TSHR/ENV/F01] c) List of Significant Aspect [TSHR/ENV/F02] d) Environment Improvement Plan [TSHR/ENV/F08] <p>The agreement between the EPD [<i>Surat Akujanji Selaras dengan Peruntukan Seksyen 12E(1), Enakmen Perlindungan Alam Sekitar 2002</i> between TSH Resources Berhad and Sabah Environmental Protection Department dated on 26/9/2016], was also available</p> <p>Activities among others as listed below:</p> <ul style="list-style-type: none"> a) boiler stack emission which associated with air emission, palm oil mill effluent (POME) discharge b) land contamination which related to managing the scheduled waste and general waste 	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> c) For the estate operation, all activities from harvesting, pest and disease, upkeep programme until delivery to mill has been identified. d) to evaluate and analyse impact on soil, water, and air associated with the organization activities. e) agrochemical applications, land and water contamination from hazardous material and farm vehicles, human settlement disturbance and abandonment areas. 	
5.1.2	<p>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.</p> <p>- Minor compliance -</p>	<p>Based on the assessment of environmental aspect and impact, the operating units came up with list of significant aspects and established the environmental improvement plan thereafter to mitigate the negative effects. Based on site visits, the implementation of the action plan was adequate.</p>	Complied
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>This was addressed in the Environmental Continual Improvement Plan (TSHR/ENV/F08; rev. 0, dated 1/9/2015), where environmental issues, improvement plan, location, PIC and time frame were included. The environmental improvement plan was implemented to ensure the effectiveness of the mitigation measures. The plan incorporated a monitoring protocol, which is adaptive to operational changes and will be review on annual basis to reflect the results of monitoring operational changes that may have positive and negative environmental impacts. Latest review was done on January 2018.</p>	Complied
<p>Criterion 5.2: The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and and operations managed to best ensure that they are maintained and/or enhanced.</p>			

Criterion / Indicator		Assessment Findings	Compliance
5.2.1	Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). - Major compliance -	An Internal TSH competent personnel conducted Biodiversity assessment & HCV identification within Lahad Datu POM and estates landholdings. The report was prepared by the Sustainability Unit; in-line with the report of EIA i.e. <i>Proposed Replanting of 3007 Hectares Oil Palm Plantation at Ong Yah Ho Estate and Gomantong Estate on Land Title Nos. CL095327218 and CL095310731, in the District of Kinabatangan, Sabah</i> . The objective of the assessment is to have additional ground check on the existing identified HCV area made in 2007 in order to obtain a detailed and accurate database and mapping. A total of 19 ha HCV set-aside area was identified within OYH.	Complied
5.2.2	Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan. - Major compliance -	Regular patrols within the operating unit estates were carried out and findings were recorded by the respective Estate Executives to monitor the conservation, buffer zone areas and HCV areas. There are no operations being carried out nor allowed at the designated areas. The mechanism for reporting the sightings of various types of wildlife, were found to be adequately maintained. Monitoring and control of any illegal hunting, fishing or collecting activities was also implemented. Signages that prohibit hunting, fishing and water polluting activities to create awareness among the communities were available and evenly maintained at the both visited estates audited.	Complied

Criterion / Indicator	Assessment Findings	Compliance																																																																				
<p>5.2.3</p> <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>The programs to regularly educate the workforce and community about the status of the RTE species have been established with on-going consultation with the relevant authorities. The annual program has also included this subject (HCV/EIA awareness) as part of the training session to be organized by the operating units. Training held for the current year 2018 has been made with records as follows;</p> <table border="1" data-bbox="1025 619 1823 858"> <thead> <tr> <th colspan="4">Gomantong Estate</th> </tr> <tr> <th></th> <th>Date</th> <th>Subjects</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>30/11/18</td> <td>MSPO/RSPO /Best practices</td> <td>Entire</td> </tr> <tr> <td>2</td> <td>31/10/8</td> <td>Sustainability understanding</td> <td>Entire</td> </tr> <tr> <td>3</td> <td>27/10/18</td> <td>Environmental Care & Procedures</td> <td>Entire</td> </tr> <tr> <td>4</td> <td>11/1/18</td> <td>HCV briefing</td> <td>12</td> </tr> </tbody> </table> <table border="1" data-bbox="1025 890 1823 1129"> <thead> <tr> <th colspan="4">Ong Yah Ho Estate</th> </tr> <tr> <th></th> <th>Date</th> <th>Subjects</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>28/6/18</td> <td>MSPO/RSPO /Best practices</td> <td>Entire</td> </tr> <tr> <td>2</td> <td>28/2/18</td> <td>Environmental Care and Procedures</td> <td>Entire</td> </tr> <tr> <td>3</td> <td>28/6/18</td> <td>Policies briefing</td> <td>Entire</td> </tr> <tr> <td>4</td> <td>11/1/18</td> <td>HCV briefing</td> <td>12</td> </tr> </tbody> </table> <table border="1" data-bbox="1025 1161 1823 1329"> <thead> <tr> <th colspan="4">Lahad Datu Palm Oil Mill</th> </tr> <tr> <th></th> <th>Date</th> <th>Subjects</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>12/12/17</td> <td>RSPO/MSPO awareness</td> <td>Entire</td> </tr> <tr> <td>2</td> <td>23/10/18</td> <td>HCV/ IA awareness</td> <td>Entire</td> </tr> <tr> <td>3</td> <td>20/3/18</td> <td>Wildlife guidelines</td> <td>Entire</td> </tr> </tbody> </table>	Gomantong Estate					Date	Subjects	Attendees	1	30/11/18	MSPO/RSPO /Best practices	Entire	2	31/10/8	Sustainability understanding	Entire	3	27/10/18	Environmental Care & Procedures	Entire	4	11/1/18	HCV briefing	12	Ong Yah Ho Estate					Date	Subjects	Attendees	1	28/6/18	MSPO/RSPO /Best practices	Entire	2	28/2/18	Environmental Care and Procedures	Entire	3	28/6/18	Policies briefing	Entire	4	11/1/18	HCV briefing	12	Lahad Datu Palm Oil Mill					Date	Subjects	Attendees	1	12/12/17	RSPO/MSPO awareness	Entire	2	23/10/18	HCV/ IA awareness	Entire	3	20/3/18	Wildlife guidelines	Entire	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
5.2.4 Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance -	Identification of high biodiversity value habitats was done through HCV Assessment for Ong Yah Ho & Gomantong Estates by a third party assessor (led by Anna Wong) on October 2015 to February 2016. Monitoring of conservation status was also recommended by the HCV assessor which is to yearly conduct a long term wildlife monitoring study which encompasses all the vertebrate classes, since contained one critically endangered species, two endangered species, four vulnerable species, five nearly threatened and several CITES Appendices I and II species. The study is to be carried out even after oil palm harvesting to update the wildlife data whether the populations trend is reducing or increasing. However, the established action plan has yet to adequately address the recommendation. The estates continued to monitor HCV using the monitoring form (rev no 01/1/18) having the following details. a) <i>Vertebrata</i> class b) Species name/common name c) Photos/Location d) Number sighted during working hours To date no RTE being sighted based on the information collated.	Complied
5.2.5 Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	This is not applicable as there was no HCV set-aside that needs any negotiation process with the local communities	Complied
Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.		

Criterion / Indicator		Assessment Findings	Compliance
5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	The CU has identified and documented all waste product and sources of pollution from its activities. The environmental management plans were established at each site to manage and mitigate the wastes and its impact. Among others the significant environmental receptors for the estates and mill operations are: <ul style="list-style-type: none"> a) Air emissions from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping) and GHG. b) Water discharges from cleaning water/run-off/process station waters (hydro cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blowdown. c) Land contamination – scheduled waste, domestic waste and industrial/process waste. d) Clinical waste – generated from Clinics. <p>Handling methods – kept in designated store, triple rinsed and pierced, etc. Disposal plan – e.g. sent to licensed recyclers, SW contractors, reused for landscape decoration, landfill at estate</p>	Complied
5.3.2	All chemicals and their containers shall be disposed of responsibly. - Major compliance -	Based on the visit of scheduled wastes store and records verification, the operating units disposed their used chemicals and containers in accordance to Scheduled Wastes Regulations. The disposals were done through DOE's authorized contractor e.g. <i>Legenda Bumimas Sdn Bhd</i> .	Complied
5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -	Recycling of wastes is encouraged by the operating units. Separate bins (paper, aluminum, glass and plastic) for recyclable wastes were provided and placed at various strategic area such as the mill, office, workshop & store and labour quarters.	Minor nonconformance
Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.			

Criterion / Indicator		Assessment Findings	Compliance
5.4.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -	TSH Lahad Datu POM has established and implemented the plan for improving efficiency of the use of fossil fuels mainly by conducting regular maintenance of diesel generator sets and farm tractors. TSH also optimised the renewable energy use with the operation of biogas plant with regular monitoring	Complied
Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.			
5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -	None observed. TSH Resources Bhd. has established Environmental Policy that covers prohibition of use of fire for clearing of land and open burnings (Zero Burning. Refer doc no. TSHR/POL/SPO08 rev no. 1 under clause 7B dated 1/11/2017.	Complied
5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -	Filed visit only showed Gomantong Estate has replanting underway. Sighted the replanting was conducted as per procedure. No trace of open burning was seen. Gomantong Estate has followed the TSH Resources Bhd established SOP doc no. TSHP/OPE/SOP10 dated 1/7/2016 for replanting. Felled trunks were shredded by using chipping bucket (modified sharp edge bucket) for across grain cutting of not more than 10 cm thickness at 45-60 degree angle to the trunk. Roots trunk (chips) were stacked underneath inside the trench, followed by shredded crown and the frond on top.	Complied
Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			

Criterion / Indicator	Assessment Findings	Compliance
<p>5.6.1</p>	<p>An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -</p> <p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records which covers estates and mill activities / operation. 'Pollution Identification Environmental Improvement Action Plan' – is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among the significant environmental receptors for the estates and mill operations were:</p> <ul style="list-style-type: none"> a) Air emissions –from boiler stack (smoke and particulate), vehicle and generator (smoke and gases), GHG emission from anaerobic processes (ETP, EFB dumping). b) Water discharges – Cleaning water / run-off / process station waters (hydrocyclone / sterilizer condensate/clarification waste) and boiler quenching water and blowdown. c) Land – Scheduled waste, domestic waste and industrial / process waste. d) Clinical wastes – generated from clinics. <p>The mill has conducted boiler stack sampling for each of the boiler stack. Results were within the acceptable limit. The mill was also equipped with a Continuous Emission Monitoring System (CEMS).</p> <ul style="list-style-type: none"> a) The audit team has verified the condition of the CEMS during the audit. b) The system was found to be in functional condition. c) Boiler smoke emission data are within the DOE limit. 	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	Significant pollutants identified based on TSHRSB List of Significant Aspect; Form. No.: TSHR/ENV/F02; effective date 1/9/2015 Rev. 0 including methane emission from POME treatment. The methane capture facility together with biogas engine has been installed as the plan to utilize renewable energy while reduce and minimize the GHG emission. a) The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adverse impact the environment. b) Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report Based on Palm GHG calculator, the emission of GHG in 2017 was 0.22 tCo2e/t product (CPO & PK). Details as shown in appendix K.	Complied
5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -	TSH has its monitoring system to report its significant pollutants and emissions from the operating units' activities for example monitoring stack emission from boiler operation by competent consultant. The mill has conducted its stack sampling at regulated frequency (twice a year) without fail. Based on the stack sampling reports, the emission from the chimney were reported to be in compliance with the regulated limit (0.4 g/Nm)	Complied
Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.			
Criterion 6.1: Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.			

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Criterion / Indicator		Assessment Findings	Compliance
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	Established in the Social Impact Assessment (SIA) for Proposed Replanting of 3007 Hectares Oil Palm Plantation at Ong Yah Ho Estate & Gomantong Estate on Land Title nos. CL09532718 & CL095310731, In the District of Kinabatangan, Sabah by TSH Resources Berhad; report prepared by Kiwiheng Environmental Consultants Sdn Bhd; Ref.: KWEC-(EV)/16/17; Dated June 2016. Latest stakeholder meeting was done as following: i) External Stakeholder Meeting; Dated 29/8/2018; Venue: Ong Yah Ho Estate. The meeting amongst all was attended by vendor/supplier/service provider as well as local communities among neighbouring estate representative, village head, school teacher and local authorities. ii) Internal Stakeholder Meeting; Dated 15/11/2018; Venue: Ong Yah Ho Community Hall. Other internal stakeholder meeting done including Gender meeting OYH & GMT conducted on 21/09/2018 and Welfare Committee (Workers Representative) meeting on 27/09/2018.	Complied
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	Assessment confirmed has been done with participation of affected parties as per evidence sighted including the following: - Minutes of Meeting; External Stakeholder Meeting; Date: 29/8/2018 - LD Region Internal Stakeholder Meeting Year 2018; Date: 15/11/2018	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -	Social management action plan established as Social Continual Improvement Plan; Rev. # 2; Date: 23/7/2018; Corporate Social Responsibility Gantt Chart; Rev. # 1; Effective date: 23/7/2018. Among programs established including the following: - Education: CLC Establishment - May 2017 - Health care: program hari kesehatan dan kempen derma darah; heath and papsmear talk - sep 2018 - Micro efforts: recycle bin to SK Paris 3; repair local community access road - continuous - Agricultural: collaborate with MPOB to train local villagers on GAP start: Jul 2017	Complied
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	The plan was being monitored periodically through stakeholder meeting and survey using the survey form (Soal Selidik Sosio-Ekonomi Penduduk) also known as Borang Banci. Sighted the latest survey was conducted on 15/11/2018.	Complied
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	No smallholder schemes included in TSH.	Not applicable
Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.			

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Criterion / Indicator		Assessment Findings	Compliance
6.2.1	Consultation and communication procedures shall be documented. - Major compliance -	Consultation and communication procedure is in place, TSHR/RSPO/SOP02, Rev1. Sighted process flow for communication & consultation.	Complied
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	There's a new Management official responsible i.e. Mohd. Fadilah Rusdy (QA Engineer) as per Letter of Appointment Social Person In-Charge; Date: 17/10/2018	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. - Minor compliance -	List of stakeholders maintained updated as per following: - Internal Stakeholder List; Rev1; Effective date: 01/11/18 - External Stakeholder List; Rev2; Effective date: 02/01/18 Records of communication maintained as per procedure for Information Request; Doc. # TSHR/SUST/SOP01; Rev. # 2; Date: 1/11/2017. Recorded in Employee Grievance Report; TSH/GHR/1016/ 068 (Ver. 2) as per sample grievance on stray dogs within housing area issue; dated 12/7/2018 and resolved on 17/7/2018.	Complied
Criterion 6.3:			
There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.			
6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance -	The system implemented based on following procedures: i) Information Request; TSHR/SUST/SOP01; Rev.: 2; Effective date: 1/11/2017 ii) Employee grievance; TSHR/HR/SOP06; Rev.: 0; Effective date: 12/1/2016	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance -	Based on procedures, sighted records of Stakeholder Registration Form that was used for Information Request by external stakeholders during external stakeholder meeting as per minutes of meeting. Sighted also records of Employee Grievance Report Form; TSH/GHR/1016/068 (Ver. 2) that was used for any complaints or grievance by mostly internal stakeholders sampled as following: - Employee Grievance Report; TSH/GHR/1016/ 068 (Ver. 2) as per sample grievance on stray dogs within housing area issue; dated 12/7/2018 and resolved on 17/7/2018.	Complied
Criterion 6.4: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	Procedure to identify legal and customary rights also people entitled to compensation has been established- titled Legal, Customary Rights & Compensation, TSHR/RSPO/SOP03; Rev. 1. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders sighted at time of audit.	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. - Minor compliance -	Procedure to identify legal and customary rights also people entitled to compensation has been established- titled Legal, Customary Rights & Compensation, TSHR/RSPO/SOP03; Rev. 1. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders sighted at time of audit.	Complied
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders sighted at time of audit.	Complied
Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.			

<p>6.5.1</p>	<p>Documentation of pay and conditions shall be available. - Major compliance -</p>	<p>Documentations available as per following: Mill sample sighted as following: - Employee # 05-0710; Work station: Watchman; Agreement date: 14/11/2017; Nationality: Malaysia - Employee # 05-0642; Work station: Effluent Operator; Agreement date: 3/10/2013; Nationality: Indonesia-Permit @ Kunak - Employee # 02-0622; Work station: Welder; Agreement date: 5/3/2013; Nationality: Indonesia - Employee # 06-0668; Work station: Biogas Operator; Agreement date: 7/10/2015; Nationality: Malaysia - Employee # 04-0508; Work station: Hard Bunch; Agreement date: 1/7/2010; Nationality: Indonesia - Employee # 01-0192; Work station: Lab; Agreement date: 1/2/2013; Nationality: Indonesia</p> <p>Gomantong Estate sample sighted as following: - Employee # 03-1581; Work station: Watchman; Agreement date: 2/1/2018; Nationality: Indonesia - Employee # 01-0983; Work station: Crèche Ayah; Agreement date: 2/1/2018; Nationality: Indonesia - Employee # 01-1069; Work station: General Worker; Agreement date: 2/1/2018; Nationality: Indonesia - Employee # 04-2418; Work station: Creche Ayah; Agreement date: 2/1/2018; Nationality: Indonesia - Employee # 06-0780; Work station: Harvester; Agreement date: 2/1/2010; Nationality: Indonesia</p> <p>Ong Yah Ho Estate sample sighted as following: - Employee # 04-4095; Work station: Harvester; Agreement date: 2/1/2018; Nationality: Indonesia</p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - Employee # 03-3132; Work station: Sprayer; Agreement date: 22/1/2018; Nationality: Indonesia - Employee # 03-2905; Work station: Mandores; Agreement date: 2/1/2018; Nationality: Indonesia - Employee # 04-1742; Work station: Mandores; Agreement date: 2/1/2018; Nationality: Indonesia - Employee # 07-4745; Work station: L/F Collector; Agreement date: 6/8/2018; Nationality: Indonesia 	
6.5.2	<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>Working hours is 8 hours. From Monday to Saturday. Total monthly working hours is 208 hours. The overtime maximum is 104 hours according to the Sabah Labour Ordinance 2005.</p> <p>As at current status, there was none has crossed 80 hours of overtime. Verified the payslips, the payment and calculation of over time well distributed.</p> <p>The overtime rate after 8 hours daily rated is: upkeeping</p> <ul style="list-style-type: none"> - Mon - Sat – daily rated / 8 hours x 1.5 - Sunday - daily rated / 8 hours x 2.0 - Public holiday – daily rated / 8 hours x 3.0 <p>The overtime rate after 8 hours piece rated is: harvesters</p> <ul style="list-style-type: none"> - Mon - Sat – flat rate - Sunday – flat rate x 2.0 <p>Public holiday – flat rate x 3.0</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. - Minor compliance –	The standard of housing provided for workers and their families meets the basic requirements of the government regulations, Act 446 Workers’ Minimum Standards Of Housing And Amenities Act 1990(as a guide). However, company need to demonstrate its stance related to any unauthorized permanent or temporary structure constructions and renovations or extension of existing company's houses whether allowed or not. An OFI has been raised on this matter. TSH Mill and estates has provided the minimum basic housing facilities. Electricity is subsidized and water is supplied at no charge. Water to housing was self-treated water where the treated water undergoes monitoring by the mill management.	OFI
6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers’ access to adequate, sufficient and affordable food. - Minor compliance –	Access to food for the workers are considered adequately and sufficiently provided through provision shops available in each estate and mill site. Sighted canteens/provision shops at estates and mill. Reviewed current prices monitored by the company on monthly basis and interview with local staff and foreign staff indicated that the services / food prices at the canteen and shops were convenient and affordable.	Complied
Criterion 6.6: The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	Policy on Freedom of Association is in place dated 16/10/2015. Policy reflected the Work Act 1955. Procedure Equal Opportunity & Discrimination, TSH/POL/SOP03, Rev0 in place.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	In absence of union representation, workers form a welfare committee and latest Welfare Meeting was conducted on 27/09/2018.	Complied
Criterion 6.7: Children are not employed or exploited.			
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	The minimum working age is 16 under the National Labour Law as well as Sabah Labour Ordinance. Company policy is to only hire persons over the age of 18. This is reflected in the Procedure Child Labour, TSHR/POL/SOP07; Rev. 0. Malaysian workers have to provide ID card - foreign workers provide passports. Inspection of employment records confirmed checks are made of staff and worker age before hiring. During field visit, children were not seen at any of the working place at both mill and estates. Interview with workers confirmed the understanding of company policy on children workers.	Complied
Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	A policy on equal opportunity available and displayed at the offices along with the other policies. Policy is known as the Equal Opportunity & Discrimination. Policies were in dual language (English & Malay).	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	<p>Foreign workers are with contracts on a 1 year review. Local workers are on a long term employment. There were no discrimination sighted at time of audit. Job opportunities and amenities such as free housing, water and electricity supplies, medical care are given to all employees without discrimination. All employees are aware of the grievance procedures / flow through the various Committees such as Gender Committee for women, foreign workers representation and worker’s leader (representative), Welfare Committee to highlight their concerns and grievances if any.</p> <p>No grievances were highlighted to the audit team by internal and external stakeholders. Issues raised were channelled through complaint forms submitted to the mill and estate management for further actions.</p>	Complied
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	<p>Recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. It was noted during the audit that there is no discrimination based on nationality, race, gender and age.</p> <p>Foreign workers were accepted upon completion of medical tests and positive results from FOMEMA.</p>	Complied
<p>Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.</p>			

Criterion / Indicator		Assessment Findings	Compliance
6.9.1	<p>Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce.</p> <p>- Major compliance -</p>	<p>Policy on protection against Sexual Harassment available and made aware to all the women representatives at the Gender Committee meetings.</p> <p>There is no any reported case of harassment in the operating units.</p> <p>A combined operating units Women Association Committee meeting was conducted on 21/09/2018 mainly as part of the implementation and communication medium on sexual harassment prevention among women employees. Awareness among the rest of employees also provided through Welfare Committee (Workers Representative) meeting on 27/09/2018.</p>	Complied
6.9.2	<p>A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce.</p> <p>- Major compliance -</p>	<p>Reproductive rights of the female workers are protected. Female employees are aware that they are entitled for two months paid maternity leave. Entitlement is same for both local and foreign workers.</p> <p>Revised policy on 21/3/2016 TSHR/POL/SOP06.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
6.9.3	<p>A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p> <p>TSH has developed a Procedure for Sexual Harassment, TSHR/HR/SOP05; Rev. 0 as guidance for gender committee. Method of complaint is in place and the Form- Sexual Harassment Action Form.</p> <p>Sites were headed by Gender Committee representatives and supported by the respective management at sites. Committees were known as Women Committee and were supported by the TSH management.</p> <p>No negative issues were highlighted during the meetings. Proposals for women improvements were discussed for benefits of families , children immunisation and housing environment.</p>	Complied
<p>Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.</p>		
6.10.1	<p>Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available.</p> <p>- Minor compliance -</p> <p>Purchase of oil palm fruit from external parties is arranged by the TSH Management As per notification memo by Marketing Department displayed on weighbridge:</p> <ul style="list-style-type: none"> - Memo date: 4/12/2018; November 2018 FFB trade price = RM 286/mt - Memo date: 1/11/2018; October 2018 FFB trade price = RM 342/mt 	Complied
6.10.2	<p>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).</p> <p>- Major compliance -</p> <p>TSH Mill has continued to purchase FFB from Independent Smallholders and has maintained a good relationship with them. Interview with most of the Smallholders confirmed they understood the requirements and stated they had been supplying FFB to TSH Mill continuously. The current pricing is written in the notice board near the weighbridge station at the mill and in front of the payment counter (price for Nov 2018). The latest price will be retrieved from the MPOB website and forwarded to the Group Executive Director at the HQ in Tawau for final approval before display.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>6.10.3</p>	<p>Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.</p> <p>- Minor compliance -</p> <p>Except for FFB supplier among smallholders, all parties having mutual agreements with operating units through purchase orders and had entered their deliveries with adequate understanding of the terms and conditions set between both parties.</p> <p>On site stakeholder interviews and consultation carried out with the various contractors further confirmed their understanding of the requirements.</p> <p>Since no actual contractual agreement except for monthly FFB Statement, FFB payment for smallholders were done based on following:</p> <ul style="list-style-type: none"> - Final FFB Statement for October 2018; Supplier: Chew Liok Bee; Date: 12/11/2018; Custom Report for Sales and Purchases Report: 1 – 31/10/2018 - Final FFB Statement for October 2018; Supplier: Lee Voon Yen & Sons Co.; Date: 12/11/2018; Custom Report for Sales and Purchases Report: 1 – 31/10/2018 - Final FFB Statement for October 2018; Supplier: Sumarni Binti Marsuki.; Date: 12/11/2018; Custom Report for Sales and Purchases Report: 1 – 31/10/2018 	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	<p>Review on payment records found all payment was made in timely manner. This was further verified during interviews with the respective stakeholders that were contractors, re-planters, transportations, spare-parts, hardware.</p> <p>Evidence obtained during the review shown all payments were timely disperse through cheque payments and internet banking (whichever preferred by the service providers/vendors) as per following sample FFB Final Payment:</p> <ul style="list-style-type: none"> - Supplier: Chew Liok Bee; Payment Voucher # A/V05459; Date: 23/10/2018 - Supplier: Lee Voon Yen & Sons Co.; Payment Advise Ref. # GLVB13564506; Date: 14/11/2018 - Supplier: Sumarni Binti Marsuki; Payment Advise Ref. # GLVB13564562; Date: 14/11/2018 	Complied
Criterion 6.11:			
Growers and millers contribute to local sustainable development where appropriate.			
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	Plans for continuous improvement including annual budgeting for CSR contributions sighted including Friendly Futsal Tournament (26/07/18), SMK Paris 3 Mill Visit 2018 (25/07/18), Workers Day Celebration for TSH LDPOM, OYH & GMTG 2018 (01/05/18), Maulidur Rasul Celebration (01/12/17) and Cleaning of Surau (10/11/17).	Complied
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	No scheme smallholders within TSH certification unit.	Not applicable

Criterion / Indicator		Assessment Findings	Compliance
Criterion 6.12: 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. - Major compliance -	There's no more practice of the use of <i>Surat Penjamin</i> since the last closure of Major NC raised during previous audit. The current practice for leave application has no longer reflective of forced labour.	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	No any contract substitution occurred among TSH workers.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	A Special Labour Policy; Doc. # TSHR/POL/SOP10; Rev. # 2; Date: 26/11/2018 was established and implemented mainly for any foreign workers working under TSH Group in Sabah.	Complied
Criterion 6.13: Growers and millers respect human rights.			
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	The Human Rights & Responsible Business Policy; Doc. no.: TSHR/POL/SOP09 Rev. 0 dated 16/10/2015 was signed by MD and communicated through internal stakeholder meeting, assembly and etc.	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.	TSH Management has set up the school facility (Community Learning Centre-CLC) within the estate's compound for foreign workers children. Contributions include tables/chairs, toilets, water supply, lights, fans and gated compound. An assistant teacher is allocated to the school to support the teacher from CLC.	Complied
Principle 7: Responsible development of new plantings			

Criterion / Indicator	Assessment Findings	Compliance
Sungai Tong Palm Oil Mill	Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this annual surveillance assessment. The immature areas are replanted area.	
Principle 8: Commitment to continual improvement in key areas of activity		
Criterion 8.1: Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.		

Criterion / Indicator	Assessment Findings	Compliance
<p>8.1.1</p> <p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); <ul style="list-style-type: none"> • Optimising the yield of the supply base. <p>- Major compliance -</p>	<p>TSH LDPOM CU is seen committed to reduce the use of pesticides by implementing IPM such as the increase in the planting of nectariferous beneficial plants such as <i>Cassia cobanensis</i>, <i>Turnera subulata</i>.</p> <p>All estates are not using paraquat and class 1a or 1b agrochemicals. These efforts are continue to reflect the commitment to reduce the use of hazardous agrochemicals. Systemic herbicides such as glyphosate are used with increased efforts in IPM. Barn owl is being introduced as well. These are the continuous efforts from operating units to reduce pesticide use. All operating units have carried out annual review of the environmental and social aspects of its operations to identify improvements.</p> <p>The Social Action Plan has continued to work towards improving stakeholder relationship through engagement and dialogue besides further improving the workers housing. Initiative on reduction of GHG emission at Palm Oil Mill showed commitment towards continual improvement where methane captured facility with gas engine has been installed.</p> <p>On social improvements efforts, it was prominently evidence that the provision of and maintenance of staff and workers housing demonstrated high commitment in social improvements for estate livelihood.</p>	<p>Complied</p>

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Appendix B: Approved Time Bound Plan

RSPO Certification of TSH Mills and Supply bases						
Companies	2016	2017	2018	2019	2020	2021
Malaysia						
TSH Plantation Management Sdn Bhd			Kunak POM & Maju Sawit Estate	Sabahan POM		
TSH Resources Berhas		Gomantong Estate ¹				
TSH Palm Products Sdn Bhd		OYH Estate ¹				
TSH Holding Sdn Bhd			Wakuba Estate ²			
LKSK Sdn Bhd			LKSK Estate ²			
Landquest Sdn Bhd			Landquest Estate ²			
TSH Plantations Sdn Bhd		Lahad Datu POM ¹		Sabahan Estate ³		
RT Plantations Sdn Bhd				RT Estate ²		
Indonesia						
PT Andalas Agro Industri		AAI POM ⁵				
PT Laras Internusa		LIN Estate ⁵				
PT Andalas Wahana Berjaya						
PT Sarana Prima Multi Niaga	SPMN POM ⁴ & SPMN Estate ⁴					
PT Mitra Jaya Cemerlang					MJC Estate ⁴	
PT Farinda Bersaudara			FDB POM ⁶ & FDB Estate ⁶			
PT Teguh Swakarsa Sejahtera			TSS Estate ⁶			
PT Munte Waniq Jaya Perkasa				MWJP Estate ⁶		
PT Perkebunan Sentawar Membangun						PSM Estate ⁶
PT Bulungan Citra Agro Persada						BCAP POM* & BCAP Estate
PT Andalas Wahana Sukses						AWS POM* & AWS Estate
<p>Note: Superscript 1 supplies to Lahad Datu POM. Superscript 2 supplies to Kunak POM. Superscript 3 supplies to Sabahan POM. Superscript 4 supplies to SPMN POM. Superscript 5 supplies to AAI POM. Superscript 6 supplies to FDB POM.</p> <p>Note: * (Asterisk) Indicates POM not yet built.</p> <p>Note: This schedule may be subject to change but we will endeavour to keep the final schedule as close as possible to what appears here.</p>						

Appendix C: GHG Reporting Executive Summary

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

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

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

Emission per product	tCO ₂ e/tProduct
CPO	0.22
PKO	0.22

Extraction	%
OER	25
KER	5.5

Production	t/yr
FFB Process	141115.89
CPO Produced	23,963.31
PKO Produced	5,855.2

Land Use	Ha
OP Planted Area	2852.0
OP Planted on peat	0
Conservation (forested)	19
Conservation (non-forested)	0
Total	2871

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	18814.98	0.29	0	0	0	0	18814.98	0.29
CO ₂ Emission from fertilizer	1660.09	0.03	0	0	0	0	1660.09	0.03
NO ₂ Emission	2979.46	0.05	0	0	0	0	2979.46	0.05
Fuel Consumption	535.53	0.01	0	0	0	0	535.53	0.01
Peat Oxidation	0	0	0	0	0	0	0	0
Crop Sequestration	-17834.1	-0.28	0	0	0	0	-17834.1	-0.28
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	6155.96	0.1	0	0	0	0	6155.96	0.1

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	3672.4	0.03
Fuel Consumption	1061	0.01
Grid Electricity Utilisation	0	0
Credit		
Export of Grid Electricity	-12.88	0
Sales of PKS	-1116.52	-0.01
Sales of EFB	-292.15	0
Total	3311.85	0.02

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	1707.24
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

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

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

5.1 Applicability of the general chain of custody requirements for the supply chain									
	Requirement	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)						
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.	Lahad Datu POM has the physically handle the RSPO Certified Sustainable oil palm products. All trading, contract and sales are managed by Sales department at HQ.	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.	Lahad Datu POM is not a trader or distributor.	Yes						
5.1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.	Company info available through RSPO IT Platform as following: <table border="1" data-bbox="1144 1034 1899 1177"> <tr> <td>Member Name</td> <td>TSH Plantation Sdn. Bhd. (Lahad Datu Palm Oil Mill)</td> </tr> <tr> <td>Member ID</td> <td>RSPO_PO1000005713</td> </tr> <tr> <td>RSPO Membership Number</td> <td>1-0173-14-000-00 (TSH Resources Berhad)</td> </tr> </table>	Member Name	TSH Plantation Sdn. Bhd. (Lahad Datu Palm Oil Mill)	Member ID	RSPO_PO1000005713	RSPO Membership Number	1-0173-14-000-00 (TSH Resources Berhad)	Yes
Member Name	TSH Plantation Sdn. Bhd. (Lahad Datu Palm Oil Mill)								
Member ID	RSPO_PO1000005713								
RSPO Membership Number	1-0173-14-000-00 (TSH Resources Berhad)								
5.1.4	Processing aids do not need to be included within an organization’s scope of certification.	No processing aids needed and included within Lahad Datu POM scope of certification.	Yes						
5.2 Supply chain model									

5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	The Palm Oil Mill receives and process both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified Products.	Yes
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Lahad Datu Palm Oil Mill is certified with Mass Balance Module.	Yes
5.3. Documented Procedures			
5.3.1	The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:	Written documented procedures was established; Supply Chain; Doc. # TSHR/SUST/SOP05; Rev. # 2; dated 1/11/2018 with Mass Balance (MB) model covering all the RSPO Supply Chain Certification Standard and Traceability for handling certified and noncertified FFB.	Yes
	<ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. 		
	<ul style="list-style-type: none"> • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 	Records of Todate FFB Received 2017/2018 for FFB received from both certified and non-certified source sighted available. Other than own supplying estates (Ong Yah Ho & Gomantong), external suppliers including the sample sighted as following: <ul style="list-style-type: none"> - Agriasia Plantation Sdn. Bhd. - Ansur Maju - Arpa Padupay - Asia Teguh 	Yes
	<ul style="list-style-type: none"> • Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization’s procedures for the implementation of this standard. 	The Chief Clerk has been appointed as the Supply Chain Person In-Charge as per letter dated 27/11/2017. The MB model is used because certified and noncertified (OCP crop) FFB is received and processed at Lahad Datu Palm Oil Mill.	Yes

5.3.2	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p>	<p>Records shown audit was conducted on 24-26/9/2018 as per sighted Internal Audit Checklist (Based on RSPO Supply Chain Certification Standard); Form # TSHR/SUST/F05; Rev. # 0; Effective date: 30/5/2018 Audit conducted based on procedures as following:</p> <ul style="list-style-type: none"> - Corrective & Preventive Action; Doc. # TSHR/QD/SOP05; Rev. # 1; Effective date: 30/11/2018 - Audit; Doc. # TSHR/QD/SOP03; Rev. # 2; Effective date: 31/05/2018 	Yes
	<p>ii) effectively implements and maintains the standard requirements within its organization</p>	<p>Total 6 Major NCs were raised by the internal auditors whom has verified and closed all findings on 24/11/2018 effectively according to the standard requirements.</p>	Yes
<p>5.4. Purchasing and goods in</p>			
5.4.1	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; 	<p>Implementation was based on FFB Purchase procedure; Doc. # TSHR/PR/SOP03; Rev. # 1; Effective Date: 19/2/2018. Sample external FFB purchase:</p> <ul style="list-style-type: none"> - Supplier: Cheah Kit Kong; W/bridge ticket # 16434; Date: 25/11/2018; GRN # 256884; Nett weight: 4820kg; Vehicle # SD6113C - Supplier: TSH Palm Product Sdn. Bhd. (Certified Crop); W/bridge ticket # 16780; Date: 30/11/2018; GRN # 257145; Nett weight: 6540kg; Vehicle # SD6510K 	Yes

	<ul style="list-style-type: none"> • A unique identification number 		
	<ul style="list-style-type: none"> • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). 	The 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.	Yes
	<ul style="list-style-type: none"> • The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance. 	Based on Procedure and transaction records available, the site receiving RSPO certified oil palm products were ensured the RSPO certification status are verified. All transactions were confirmed through PalmTrace website.	Yes
	<ul style="list-style-type: none"> • A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements. 	Based on Procedure and transaction records available, the site receiving RSPO certified oil palm products were ensured the RSPO certification status were verified. All transactions were confirmed through PalmTrace website.	Yes
	<ul style="list-style-type: none"> • The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements. 	Not applicable.	N/A
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	Mechanism in place for handling nonconforming oil palm products and/or documents was describe in the procedure available. No non-conforming products recorded since last audit.	Yes

5.5. Outsourcing activities			
5.5.1	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p>	<p>Outsource only involved transportation of products, i.e. CSPO and CSPK, subjected to the buyers' contractual requirements either ex-mill or delivered. Mostly delivered contracts involved CSPO and and ex-mill involved CSPK. Implementation for CSPO was based on the procedure Crude Palm Oil (CPO); Doc. # TSHPOM/LB/SOP01; Rev. # 3; Effective date: 7/12/2017; Section D: CPO Dispatch – D1 (Before CPO Filling Process) & D2 (After CPO Filling Process).</p>	Yes
5.5.2	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a. The site has legal ownership of all input material to be included in outsourced processes;</p>	<p>The mill trades CSPO and CSPK with its buyers among refineries and/or oleochemical plants. Based on agreements, transporter has no ownership of transported products.</p>	Yes
	<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>	<p>Sighted the recent contract for both CSPO and CSPK were delivered, hence requiring outsource process i.e. transportation. The recent outsourcing of CSPO and CSPK transport as per following:</p> <ul style="list-style-type: none"> - Transportation Agreement; Transporter: HMK Transport Sdn. Bhd.; Commodity: CPO; Contract Addendum; Ref. # SUST/12/2017/01; Date: 28/12/2017 - Transportation Agreement; Transporter: Pengangkutan Sri Silam; Commodity: PK; Contract Addendum; Ref. # SUST/12/2017/01; Date: 28/12/2017 	Yes

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	c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.	Written documented procedures was established; Supply Chain; Doc. # TSHR/SUST/SOP05; Rev. # 2; dated 1/11/2018 with Mass Balance (MB) model covering all the RSPO Supply Chain Certification Standard and Traceability for handling certified and noncertified FFB.	Yes
	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.	Both CSPO and CSPK transporters agreed, as per agreement, to provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.	Yes
5.5.3	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	Names and contact details of transporters used for the physical handling of RSPO certified oil palm products were recorded and registered in the mill supplier database system.	Yes
5.5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	Names and contact details of any new transporter used for the physical handling of RSPO certified oil palm products to be informed by mill supply chain PIC upon available.	Yes
5.6. Sales and goods out			
5.6.1	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> The name and address of the buyer; The name and address of the seller; The loading or shipment/ delivery date; The date on which the documents were issued; A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); The quantity of the products delivered; 	<p>Minimum information of RSPO certified products available in trading contract documents as per following sample contracts:</p> <ul style="list-style-type: none"> Buyer: Lahad Datu Edible Oils Sdn. Bhd.; Contract # 400002012; Sales order: 1000004699; Date: 29/3/2018; Commodity: TF00003 Palm Kernel (PK) / RSPO MB; Quantity: 350mt Buyer: Lahad Datu Edible Oils Sdn. Bhd.; Contract # 400002062; Sales order: 1000004836; Date: 28/6/2018; Commodity: TF00003 Palm Kernel (PK) / RSPO MB; Quantity: 350mt 	Yes

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	<ul style="list-style-type: none"> Any related transport documentation; Supply chain certificate number of the seller; A unique identification number 	<ul style="list-style-type: none"> Buyer: TSH-Wilmar Sdn. Bhd.; Contract # 400002056; Sales order: 1000004835; Date: 28/6/2018; Commodity: TF00002 Crude Palm Oil (CPO) / RSPO MB; Quantity: 1500mt Buyer: TSH-Wilmar Sdn. Bhd.; Contract # 400002011; Sales order: 1000004698; Date: 29/3/2018; Commodity: TF00002 Crude Palm Oil (CPO) / RSPO MB; Quantity: 1500mt 	
	<p>Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</p>	<p>A complete and detail informations were presented in the transaction documents as per following:</p> <p>Sample dispatch of CSPO:</p> <ul style="list-style-type: none"> Buyer: TSH Wilmar Sdn. Bhd.; W/bridge ticket # 17212; Date: 19/4/2018; DN # 15560; Nett weight: 35950kg; Vehicle # JQD8193 Buyer: TSH Wilmar Sdn. Bhd.; W/bridge ticket # 17209; Date: 18/4/2018; DN # 15557; Nett weight: 35930kg; Vehicle # JQD8193 Buyer: TSH Wilmar Sdn. Bhd.; W/bridge ticket # 17211; Date: 18/4/2018; DN # 15559; Nett weight: 33550kg; Vehicle # JQE9893 <p>Sample dispatch of CSPK:</p> <ul style="list-style-type: none"> Buyer: Lahad Datu Sdn. Bhd.; W/bridge ticket # 17605; Date: 27/7/2018; DN # 15953; Nett weight: 29270kg; Vehicle # SD25N Buyer: Lahad Datu Sdn. Bhd.; W/bridge ticket # 17602; Date: 26/7/2018; DN # 15950; Nett weight: 27840kg; Vehicle # ST6660R 	<p>Yes</p>

		- Buyer: Lahad Datu Sdn. Bhd.; W/bridge ticket # 17235; Date: 23/4/2018; DN # 15583; Nett weight: 28590kg; Vehicle # SAB6660V	
	<ul style="list-style-type: none"> For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance. 	Announcement registered in PalmTrace system by the HQ Sales Department personnel. Based on PalmTrace transaction report, there were multiple (as per appendix) shipping announcements of both CSPO and CSPK made since the last assessment.	Yes
5.7. Registration of transactions			
5.7.1	Supply chain actors who: <ul style="list-style-type: none"> are mills, traders, crushers and refineries and; take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. 	The registration of PalmTrace was carried out by the HQ Sales Department based in Tawau. All transactions were registered accordingly in the PalmTrace.	Yes
5.7.2	The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: <ul style="list-style-type: none"> Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. 	Based on the announcement summary, all the registrations were found to be in order.	Yes
	<ul style="list-style-type: none"> Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace 	Not applicable. Products are not sold beyond refinery.	Not applicable

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	document with a unique traceability number. Tracing can be done in a consolidated way at least annually.		
	<ul style="list-style-type: none"> Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. 	Based on the accounting (Mass Balance Allocation Sheet), the removal of volumes was done correctly when the products were sold as conventional.	Yes
	<ul style="list-style-type: none"> Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 	Based on the announcement summary, all the confirmations were found to be in order.	Yes
5.8. Training			
5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.	Training plan on RSPO Supply Chain Standards requirements was established Established as TSH Training Matrix_Mill & Estate; Ref. 4.1.	Yes
5.8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.	Records of Training Attendance Form; Form # TSHR/TD/F01; Effective date: 1/3/2016; Rev. # 1; Program Name: RSPO Supply Chain Certification Standard; Date: 25/10/2018; Venue: LDPOM	Yes
5.9. Record Keeping			
5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	Lahad Datu Palm Oil Mill has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.	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.	All relevant records related to supply chain available since at least past 2 years. Current records shown positive stock was reported as of the record dated 31/11/2018 for CPO = 1,718.69 mt.	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	Based on the Mass Balance Sheet, the volume of CPO and PK has been allocated to both certified and noncertified products.	Yes

	palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.		
5.10. Conversion factors			
5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivaties. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.	Conversion factor of CPO and PK production is depending on the actual OER and KER. Previous period under review's average were reported in earlier section of this report.	Yes
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 extraction rate and therefore updating of rates is not necessary.	Yes
5.11. Claims			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Yes
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No "off-product" claim made made by TSH LDPOM in the industry public domain.	Yes
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO	Not applicable.	N/A

	<p>d. State the member’s history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at www.rspo.org’ where the link must lead to the member’s profile page.</p>		
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not applicable.	N/A
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	Not applicable.	N/A
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	Not applicable.	N/A
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to Business communication were made through the CSPO and CSPK trading contractual and transactions documentations between the mill and buyers. No further communications made by TSH for its raw products beyond its refinery and oleochemical plants buyers.	Yes
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Not applicable.	N/A
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:	Not applicable.	N/A

	<p>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	Not applicable.	N/A
Business to consumer communication			
6.1	<p>Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as ‘product-specific’ claims. Product-specific claims are voluntary.</p>	Not applicable.	N/A
6.2	<p>Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.</p>	Not applicable.	N/A

6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	Not applicable.	N/A
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Not applicable.	N/A
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	Not applicable.	N/A
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	Not applicable.	N/A
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	Not applicable.	N/A
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org .	Not applicable.	N/A

MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES			
Auditor Hint:			
This specific rules shall be audited concurrently with the relevant Module A and Module B (including Module F & G) under the Supply Chain Modular Requirements			
Certified oil palm content (IP)			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	Not applicable.	N/A
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	Not applicable.	N/A
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	Not applicable.	N/A
Labelling and trademark (IP)			
	Members are allowed to use the RSPO label in one of the following ways: a. RSPO trademark which includes the tag 'CERTIFIED' or b. RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.	Not applicable.	N/A
Messaging (IP)			
	Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:	Not applicable.	N/A

	<ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 		
<p>MODULE B – MASS BALANCE SPECIFIC RULES</p>			
<p>Auditor Hint: This specific rules shall be audited concurrently with the relevant Module C (including Module F & G) under the Supply Chain Modular Requirements</p>			
<p>Minimum Mass Balance content (MB)</p>			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>TSH LDPOM only delivered 100% oil palm content of RSPO MB-certified products to its buyers.</p>	<p>Yes</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>Not applicable.</p>	<p>N/A</p>
<p>Labelling and trademark (MB)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p>	<p>Not applicable.</p>	<p>N/A</p>

	<ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. • In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed. 	Not applicable.	N/A

	<p>Messaging NOT ALLOWED in storytelling in product-related communications: Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</p>	<p>Not applicable.</p>	<p>N/A</p>
<p>MODULE C – PARTIAL PRODUCT CLAIMS</p>			
	<p>To increase awareness among consumers of the availability of sustainable oil palm products and to help accelerate the uptake, it is permissible to make a claim on product when the percentage of the oil palm content is less than 95% certified, but only when the following conditions have been met:</p> <ul style="list-style-type: none"> • The member making the claim is the end product manufacturer, is an RSPO member and is certified against the RSPO SCCS or is an RSPO retailer member authorized to use the trademark by the RSPO. • At least 50% of the oil palm content has been supplied through an RSPO certified supply chain as IP, SG or MB. • The remainder of the oil palm content that is not RSPO-certified is covered by the purchase of RSPO Credits to an equivalent volume. • The product-specific claim is limited to only the following phrase: 'This product contributes to the production of certified sustainable palm oil'. • The use of the RSPO label with this claim is mandatory and must include the tag '50% MIXED'. No other percentage is allowable within this claim. 	<p>Not applicable.</p>	<p>N/A</p>
<p>MODULE D – COMBINED SUPPLY CHAIN MODELS SPECIFIC RULES</p>			
	<p>Where a mixture of inputs supplied through different RSPO supply chain models are present in a product, the following applies:</p> <p>75% IP + 20% SG => 95% SG claim is made 65% SG + 30% MB => 95% MB claim is made 55% MB + 40% B&C => 95% partial product claim can be made 45% SG + 55% B&C < 50% B&C claim can be made</p>	<p>Not applicable.</p>	<p>N/A</p>

	Where one supply chain model accounts for 95% of the oil palm content, the claim for this specific model may be made: 95% IP + 5% MB => 95% IP IP claim can be made 95% SG + 5% MB => 95% SG SG claim can be made 95% MB + 5% C => 95% MB MB claim can be made	Not applicable.	N/A
5.12. Complaints			
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	The procedure for complaints (Complaints and grievances procedure, SMP-GPB-19, Rev: 02, dated 5/9/14) was established.	Yes
5.13. Management Review			
5.13.1	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.	Based on notice of management review meeting sent on 8/11/2018 by QESH Assistant Manager / Sustainability HOD, management review meeting was conducted on 26/11/2018.	Yes
5.13.2	The input to management review shall include information on: <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	Meeting was conducted as combined RSPO/MSPO supply chain review meeting. Input to management review adequately included with all information required to be reviewed.	Yes
5.13.3	The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. 	Output to management review has been included with all information required to be decided on action to be taken.	Yes

	• Resource needs.		
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Appendix E *(Please choose either IP / MB)*

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

D.1 Definition			
	Requirement	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)
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.	Not applicable.	N/A
D.2 Explanation			
D.2.1	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must 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 must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	Not applicable.	N/A

D.2.2	The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).	Not applicable.	N/A
D.3 Documented procedures			
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: a. Complete and up to date procedures covering the implementation of all the elements in these requirements;	Not applicable.	N/A
	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.	Not applicable.	N/A
D.3.2	The site shall have documented procedures for receiving and processing certified FFBs.	Not applicable.	N/A
D.4 Purchasing and goods in			
D.4.1	The site shall verify and document the tonnage and sources of certified FFBs received.	Not applicable.	N/A
D.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	Not applicable.	N/A
D.5 Record keeping			
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.	Not applicable.	N/A

	<i>IP Mill must report on real time basis.</i>		
D.6 Processing			
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.	Not applicable.	N/A

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

E.1 Definition					
	Requirement	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)		
E.1.1	Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	The Palm Oil Mill receives and process both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified Products.	Yes		
E.2 Explanation					
E.2.1	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.	Yes		
E.2.2	The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).	Company info available through RSPO IT Platform as following: <table border="1" data-bbox="1137 1321 1877 1362"> <tr> <td>Member Name</td> <td>TSH Plantation Sdn. Bhd. (Lahad Datu Palm Oil Mill)</td> </tr> </table>	Member Name	TSH Plantation Sdn. Bhd. (Lahad Datu Palm Oil Mill)	Yes
Member Name	TSH Plantation Sdn. Bhd. (Lahad Datu Palm Oil Mill)				

		Member ID	RSPO_PO1000005713	
		RSPO Membership Number	1-0173-14-000-00 (TSH Resources Berhad)	
E.3 Documented procedures				
E.3.1	<p>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 was established; Supply Chain; Doc. # TSHR/SUST/SOP05; Rev. # 2; dated 1/11/2018 with Mass Balance (MB) model covering all the RSPO Supply Chain Certification Standard and Traceability for handling certified and noncertified FFB.</p> <p>Records of Todate FFB Received 2017/2018 for FFB received from both certified and non-certified source sighted available. Other than own supplying estates (Ong Yah Ho & Gomantong), external suppliers including the sample sighted as following:</p> <ul style="list-style-type: none"> - Agriasia Plantation Sdn. Bhd. - Ansur Maju - Arpa Padupay - Asia Teguh 	Yes	
	<p>b. The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.</p>	<p>The Chief Clerk has been appointed as the Supply Chain Person In-Charge as per letter dated 27/11/2017. The MB model is used because certified and noncertified (OCP crop) FFB is received and processed at Lahad Datu Palm Oil Mill.</p>	Yes	
E.3.2	<p>The site shall have documented procedures for receiving and processing certifies an non-certified FFBs.</p>	<p>Implementation was based on FFB Purchase procedure; Doc. # TSHR/PR/SOP03; Rev. # 1; Effective Date: 19/2/2018. Sample external FFB purchase:</p>	Yes	

		<ul style="list-style-type: none"> - Supplier: Cheah Kit Kong; W/bridge ticket # 16434; Date: 25/11/2018; GRN # 256884; Nett weight: 4820kg; Vehicle # SD6113C - Supplier: TSH Palm Product Sdn. Bhd. (Certified Crop); W/bridge ticket # 16780; Date: 30/11/2018; GRN # 257145; Nett weight: 6540kg; Vehicle # SD6510K 	
E.4 Purchasing and goods in			
E.4.1	The site shall verify and document the volumes of certified and non-certified FFBS received.	Written documented procedures was established; Supply Chain; Doc. # TSHR/SUST/SOP05; Rev. # 2; dated 1/11/2018 with Mass Balance (MB) model covering all the RSPO Supply Chain Certification Standard and Traceability for handling certified and noncertified FFB.	Yes
E.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	The facilities aware of the procedure to inform CB immediately as written in the documented procedure of Supply Chain; Doc. # TSHR/SUST/SOP05; Rev. # 2; dated 1/11/2018.	Yes
E.5 Record keeping			
E.5.1	a. The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis by RSPO.	Records available but no balance of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a 3-monthly basis.	Yes
	b. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated	Shipping Announcement records available as per Supply Chain Declaration.	Yes
	c. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.) For further details refer to Module C.	Positive stock was reported as of the record dated 31/11/2018 for CPO = 1,718.69 mt.	Yes

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Supply Chain Declaration *(Applicable For Appendix E)*

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	Nov-17	6,402.02	6,870.15	13,171.65
2	Dec-17	5,633.80	6,669.11	12,403.43
3	Jan-18	5,630.78	7,880.74	12,400.41
4	Feb-18	4,501.21	5,658.52	11,270.84
5	Mar-18	4,774.11	7,891.96	11,543.74
6	Apr-18	6,359.93	5,647.30	13,129.56
7	May-18	6,769.13	7,769.62	13,538.76
8	Jun-18	6,310.35	5,769.64	13,079.98
9	Jul-18	5,896.79	7,658.51	12,666.42
10	Aug-18	4,314.19	5,880.75	11,083.82
11	Sep-18	3,653.02	7,547.40	10,422.65
12	Oct-18	4,401.65	5,991.86	11,171.28
Total		64,646.98	81,235.56	145,882.54

Note:
Notes for Auditor: The reporting shall be from the last assessment period until current period. The period of the volume reported can be more than 12 months or less than 12 months depending on the assessment period.
Example:
Certification date is 01/01/2017.
ASA 1 conducted on 01/10/2017 – the volume to be verified and reported is from 01/01/2017 – 30/09/2017 (9 months)
ASA 2 conducted on 14/12/2018 – the volume to be verified and reported is from 01/10/2017 – 30/11/2018 (13 months)

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Nov-17	1,322.02	352.11
2	Dec-17	1,163.38	309.86
3	Jan-18	1,162.76	309.69
4	Feb-18	929.50	247.57
5	Mar-18	985.85	262.58
6	Apr-18	1,313.33	349.80
7	May-18	1,397.83	372.30
8	Jun-18	1,303.09	347.07

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9	Jul-18	1,217.69	324.32
10	Aug-18	890.88	237.28
11	Sep-18	754.35	200.92
12	Oct-18	908.94	242.09
Total		13,349.62	3,555.59

Note:

Notes for Auditor: The reporting shall be from the last assessment period until current period. The period of the volume reported can be more than 12 months or less than 12 months depending on the assessment period.

Example:

Certification date is 01/01/2017.

ASA 1 conducted on 01/10/2017 – the volume to be verified and reported is from 01/01/2017 – 30/09/2017 (9 months)

ASA 2 conducted on 14/12/2018 – the volume to be verified and reported is from 01/10/2017 – 30/11/2018 (13 months)

C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any)

No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	LDO/36P1811/0069L,LDO/36P1812/0059L	TR-e2bc1a37-c49f	-	408.65
2	LDO/36P1810/0051L,LDO/36P1811/0069L	TR-fc1a5d30-73ef	-	294.66
3	4710007285, 7349,7414, 7350	TR-8f1d00a4-ffc5	1,618.60	-
4	LDO/36P1809/0069L,LDO/36P1810/0051L	TR-0baa22db-d855	-	625.58
5	47,100,072,854,710,000,000	TR-2a36b312-ce1b	1,468.28	-
6	LDO/36P1808/0079L,LDO/36P1809/0069L	TR-5d6d8ea8-74c5	-	272.4
7	4.710007199471E+29, 7237	TR-c235f03c-9b81	2,555.15	-
8	LDO/36P1807/0065L,LDO/36P1808/0079L	TR-6793bc1d-ace7	-	417.34
9	4.71001E+19	TR-e8806110-9777	2,052.84	-
10	LDO/36P1806/0059L,LDO/36P1807/0065L	TR-63278d65-339d	-	315.26
11	4.71001E+19	TR-e72f58ef-91eb	1,054.49	-
12	LDO/36P1806/0002L,LDO/36P1806/0059L	TR-095118e5-54d7	-	364.97
Total		-	8,749.36	2,698.86

Note:

Notes for Auditor: The reporting shall be from the last assessment period until current period. The period of the volume reported can be more than 12 months or less than 12 months depending on the assessment period.

Example:

Certification date is 01/01/2017.

ASA 1 conducted on 01/10/2017 – the volume to be verified and reported is from 01/01/2017 – 30/09/2017 (9 months)

ASA 2 conducted on 14/12/2018 – the volume to be verified and reported is from 01/10/2017 – 30/11/2018 (13 months)

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D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
Nil	n/a	n/a	n/a	n/a
-	-	-	-	-

Note:
Notes for Auditor: The reporting shall be from the last assessment period until current period. The period of the volume reported can be more than 12 months or less than 12 months depending on the assessment period.
Example:
Certification date is 01/01/2017.
ASA 1 conducted on 01/10/2017 – the volume to be verified and reported is from 01/01/2017 – 30/09/2017 (9 months)
ASA 2 conducted on 14/12/2018 – the volume to be verified and reported is from 01/10/2017 – 30/11/2018 (13 months)

E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
Nil	n/a	n/a	n/a
-	-	-	-

Note:
Notes for Auditor: The reporting shall be from the last assessment period until current period. The period of the volume reported can be more than 12 months or less than 12 months depending on the assessment period.
Example:
Certification date is 01/01/2017.
ASA 1 conducted on 01/10/2017 – the volume to be verified and reported is from 01/01/2017 – 30/09/2017 (9 months)
ASA 2 conducted on 14/12/2018 – the volume to be verified and reported is from 01/10/2017 – 30/11/2018 (13 months)

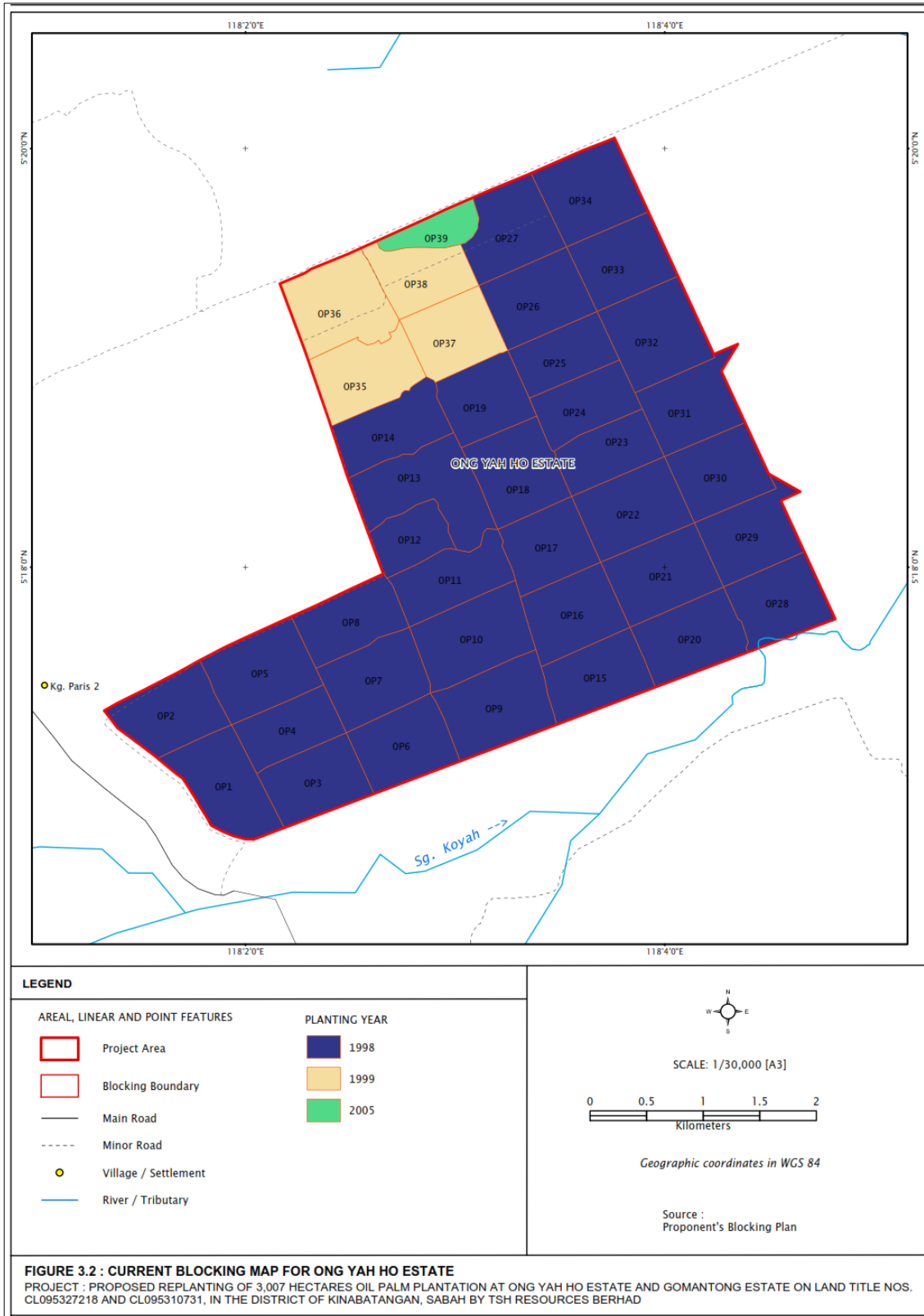
F. Records of Certified CPO Sold under RSP0 Credits to Buyers since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSP0 Credits of Certified CPO Sold (mt)
Nil	n/a	n/a	n/a
-	-	-	-

Note:
Notes for Auditor: The reporting shall be from the last assessment period until current period. The period of the volume reported can be more than 12 months or less than 12 months depending on the assessment period.
Example:
Certification date is 01/01/2017.
ASA 1 conducted on 01/10/2017 – the volume to be verified and reported is from 01/01/2017 – 30/09/2017 (9 months)
ASA 2 conducted on 14/12/2018 – the volume to be verified and reported is from 01/10/2017 – 30/11/2018 (13 months)

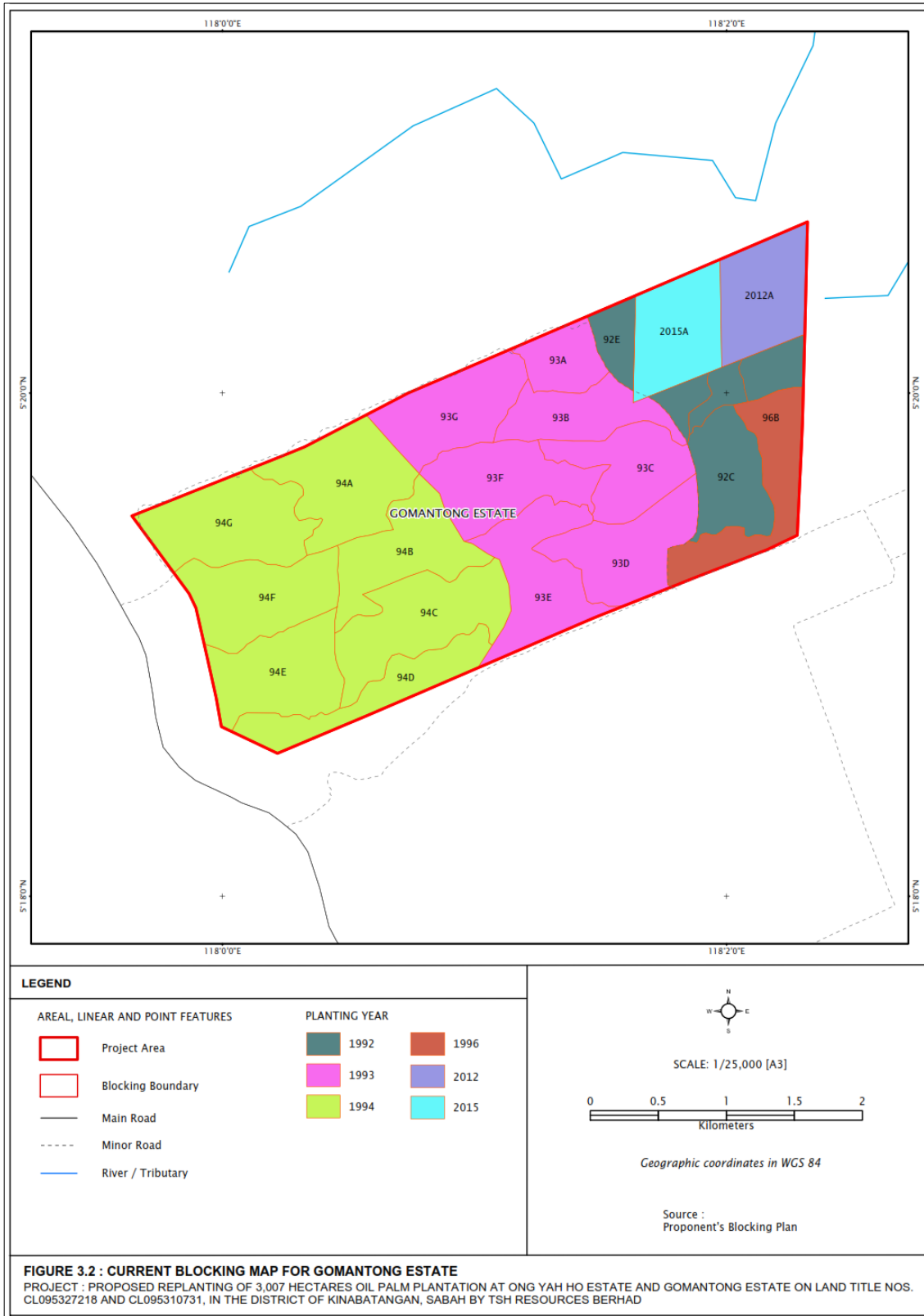
Appendix F: Location Map of Lahad Datu Palm Oil Mill Certification Unit and Supply bases



Appendix G: Ong Yah Ho Estate Field Map



Appendix H: Gomantong Estate Field Map



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

Not applicable

Appendix J: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure