

**RSPO PRINCIPLE AND CRITERIA –  
1<sup>st</sup> ANNUAL SURVEILLANCE ASSESSMENT (ASA2\_1)  
Public Summary Report**

<b>United Plantations Berhad</b>
Client company address: Jendarata Estate 36009 Teluk Intan Perak, Malaysia
Certification Unit: <b>Jendarata Palm Oil Mill and supply base</b>  Location of certification unit: Jendarata Business Unit 36009 Teluk Intan Perak, Malaysia

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## Section 1: Scope of the Certification Assessment

1. Company Details			
<b>RSP0 Membership Number</b>	1-0004-04-000-00	<b>Membership Approval Date</b>	19/07/2004
<b>Parent Company Name</b>	United Plantation Berhad		
<b>Address</b>	Jendarata Estate 36009 Teluk Intan, Perak, Malaysia		
<b>Subsidiary</b>	Jendrata Palm Oil Mill		
<b>Address</b>	Jendarata Business Unit 36009 Teluk Intan, Perak, Malaysia		
<b>Contact Name</b>	Mr. C Mathews		
<b>Website</b>	<a href="http://www.unitedplantations.com">www.unitedplantations.com</a>	<b>E-mail</b>	<a href="mailto:cmm@unitedplantaions.com">cmm@unitedplantaions.com</a>
<b>Telephone</b>	+605-6436271	<b>Facsimile</b>	+605-6417100

2. Certification Information			
<b>Certificate Number</b>	RSP0 693200	<b>Date of First Certification</b>	21/08/2008
		<b>Certificate Start Date</b>	29/09/2017
		<b>Certificate Expiry Date</b>	28/09/2022
<b>Scope of Certification</b>	Palm oil and Palm Kernel Production from Jendarata Palm Oil Mill and Supply Base (Jendarata Estate & Seri Pelangi Estate) with supply chain module D – Identity Preserved		
<b>Applicable Standards</b>	RSP0 P&C MYNI 2014 ; RSP0 Supply Chain Certification Standard 2017		

3. Other Certifications			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
RSP0 665456	RSP0 NEXT	BSI Services Malaysia Sdn Bhd	28/09/2022

4. Location(s) of Mill & Supply Bases			
<b>Name (Mill / Supply Base)</b>	<b>Location [Map Reference #]</b>	<b>GPS Coordinates</b>	
		<b>Latitude</b>	<b>Longitude</b>
Jendarata Palm Oil Mill	Jendarata Business Unit 36009 Teluk Intan, Perak	3° 51'11.36" N	100° 58'09.43" E
Jendarata Estate	Jendarata Business Unit 36009 Teluk Intan, Perak	3° 54'00.01" N	100° 58'40.44" E

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Seri Pelangi Estate	Seri Pelangi Estate, Batu 11 ¾ Jalan Bidor 36009 Teluk Intan, Perak	3° 59'37.35" N	101° 09'34.40" E
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### 5. Description of Supply Base

Estate	Total Planted (Mature + Immature) (ha)	HCV + Conservation (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Jendarata Estate	5,285.60	8.63	345.17	5,639.40	93.73
Seri Pelangi Estate	1,337.00	2.06	82.69	1,421.75	94.04
<b>Total (ha)</b>	<b>6,622.60</b>	<b>10.69</b>	<b>427.86</b>	<b>7,061.15</b>	<b>84.72</b>

Note: Further reduction in scope by 335.20ha for coconut planting.

### 6. Plantings & Cycle

Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Jendarata Estate	1,483.23	1,570.62	2,027.21	204.54	-	4,593.86	691.74
Seri Pelangi Estate	200.00	-	487.00	650.00	-	1,137.00	200.00
<b>Total (ha)</b>	<b>1,683.23</b>	<b>1,570.62</b>	<b>2,514.21</b>	<b>854.54</b>	<b>-</b>	<b>5,730.86</b>	<b>891.74</b>

### 7. Certified Tonnage of FFB (Own Certified Scope)

Estate	Tonnage / year		
	Estimated (Apr 17-May 18)	Actual (May 17 – May 18)	Forecast (Sept 18 – Sept 19)
Jendarata Estate	117,214.00	116,868.29	116,300.00
Seri Pelangi Estate	39,850.00	39,217.30	26,360.00
<b>Total</b>	<b>157,064.00</b>	<b>156,085.59</b>	<b>142,660.00</b>

### 8. Certified Tonnage of FFB (from other certified unit(s)) if applicable \*

Estate	Tonnage / year		
	Estimated (Apr 17-May 18)	Actual (May 17 – May 18)	Forecast (Sept 18 – Sept 19)
	N/A	Nil	N/A
<b>Total</b>			

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

<b>10. Certified Tonnage</b>			
Mill Capacity: 50 MT/hr  SCC Model: IP	Estimated (Apr 17 – May 18)	Actual (May 17 – May 18)	Forecast (Sept 18 – Sept 19)
	FFB	FFB	FFB
	157,064.00mt	156,085.59mt	142,660.00mt
	CPO (OER: 22.10%)	CPO (OER: 22.224%)	CPO (OER: 22.82%)
	34,711.14mt	34,689.90mt	32,550.01mt
	PK (KER: 5.20%)	PK (KER: 5.208%)	PK (KER: 5.23%)
	8,167.33mt	8,128.94mt	7,461.12mt

<b>11. Actual Sold Volume (CPO) - May 17 – May 18</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
<b>CPO (MT)</b>	27,433.36	-	-	3,603.46	31,036.82

<b>12. Actual Sold Volume (PK) - May 17 – May 18</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
<b>PK (MT)</b>	7,837.74	-	-	-	7,837.74

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

## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn Bhd,  
(ASI Accreditation Number: ASI-ACC-067)  
Unit 3, Level 10, Tower A  
The Vertical Business Suites, Bangsar South  
No. 8, Jalan Kerinchi  
59200 Kuala Lumpur  
Tel +603 2242 4211 Fax +603 2242 4218  
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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 100 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 Singapore, Jakarta, Bangkok and Australia which involve in RSPO Certification Program.

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site surveillance assessment was conducted from 25/06/2018 - 27/06/2018. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates (Jendarata Estate). A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The audit programmes are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criteria 2013 (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.

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

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

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

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

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

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

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Recertification)</b>	<b>Year 2 (ASA2-1)</b>	<b>Year 3 (ASA2-2)</b>	<b>Year 4 (ASA2-3)</b>	<b>Year 5 (ASA2-4)</b>
Jendarata Palm Oil Mill	√	√	√	√	√
Jendarata Estate	√	√	√	√	√
Seri Pelangi Estate		√	√	√	√

**Tentative Date of Next Visit:** June 24, 2019 – June 26, 2019

**Total No. of Mandays:** 10 mandays



**2.2 BSI Assessment Team:**

Team Member Name	Role	Qualification
Nicholas Cheong	Lead auditor	Holds a Master of Environmental Management from the University Putra Malaysia and Bachelor of Science (Food Science) from Charles Sturt University Australia. He has more than 5 years of working experience in sustainability auditing for palm oil industry and hydropower plant. He is also a expert in Greenhouse Gas emissions accounting. He has also 2 years of working experience in wastewater treatment and operations. He has completed the ISO9001, ISO14001, RSPO P&C Lead Auditor course, RSPO Supply Chain Lead Auditor Course, Labor & Ethic Lead Auditor Course and MSPO Awareness Training. In his previous certification body, he was a Lead Assessor for Clean Development Mechanism and ISCC. He had been involved in Sustainable Palm Oil auditing for more than 4 years. In this assessment, the focus element includes legal requirements, social and workers welfare, workers health and safety and supply chain. He is able to communicate in Bahasa Malaysia and English.
Valence Shem	Team member	Holds a Bachelor Degree in Industrial Technology from University of Science Malaysia in 1998. He has 9 years working experience in oil palm plantation industry. He started management system auditing line since 2009 for various standards such as ISO 14001, RSPO P&C, RSPO SCCS and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. In this assessment, the focus element includes legal requirements, environmental management, conservation & biodiversity, GHG emissions and agriculture best practices. He is able to communicate in Bahasa Malaysia and English.
Mohamed Hidhir Zainal Abidin	Team member	Holds a Bachelor Degree in Chemical Engineering from National University of Malaysia in 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling. He has completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He started auditing since 2013 covering standards including ISO 9001, ISO 14001, OHSAS 18001, MSPO and RSPO. He had been involved in RSPO auditing since May 2012. In this assessment, the focus element includes occupational safety and health, legal requirements and mill best practices. He is able to communicate in Bahasa Malaysia and English.
Elzy Ovktafia	Team member	Holds a Diploma of Agriculture from Universiti Putra Malaysia. She is holding the designatory of LISP from the Incorporated Society of Planters and currently in the midst of completing the AISP level (professional certificate and recognition from the Incorporated Society of Planters). She has 5 years as Agronomist in R&D Department in Oil Palm Plantation where her task involved in all Oil Palm Plantation Operations such as conducting experimental trials on Research & Development with technical paper publications, Crop Forecast, Leaf & Soil Sampling Collection, Fertilizer

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		<p>Recommendation, Pest and Diseases Training, Quality Control as well as special project namely Yield Intensification Project and Food for Palm Project for estates. She has more than 3 years of auditing and technical reviewing experiences mainly for Sustainability Programme includes RSPO, MSPO and 2nd Party Social Compliance Programme (URSA, ETI). She has completed the RSPO P&amp;C, RSPO SCC, ISO 9001:2015 Lead Auditor Course and Social Compliance Audit by Verite. In this assessment the focused element was supply chain. She is able to communicate in Bahasa Malaysia and English.</p>
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**Accompanying Persons:**

No.	Name	Role
1	Azrul Wan Azizan	BSI Observer
2	Shikin Rasikon	ASI Observer
3	Kishokumar	ASI Observer

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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	(NC)	(VS)	(MH)	(EO)
Sunday, 24/06/2018	PM	Audit Team arrive to Jendarata	√	√	√	√
Monday, 25/06/2018	08:30 – 09:00	Opening Meeting at Jendarata Palm Oil Mill <ul style="list-style-type: none"> <li>• Presentation by UP Team (if any)</li> <li>• Presentation by BSI Lead Auditor -introduction of team member and assessment agenda</li> <li>• Confirmation of assessment scope and finalized stakeholders list for interview</li> </ul>	√	√	√	√
	09:00 – 12:30	<b>Jendarata Palm Oil Mill</b> Mill Visit covering FFB receiving, milling process, warehouse, workshop, wastes management storage & Landfill, Effluent Ponds, OSH & ERP, SEIA requirement, POME application, water treatment, chemical storage, laboratory, housing and facility inspection, clinic, etc	√	√	√	
		<b>RSPO Supply Chain</b> for CPO mill, weighbridge and storage area.				√
	12:30 – 13:30	Lunch / Break	√	√	√	√
	13:30 – 17:00	<b>Jendarata Palm Oil Mill</b> <ul style="list-style-type: none"> <li>• Verification of effectiveness of findings closure</li> <li>• Document review P1 – P8: Transparency and commitments, Legal Requirement, Land use rights and compensation, Organization structure and responsibility, Long Term Economic and financial viability, Mill best practices, OHS, Workers training, Pay and contract, Social and Environment Assessment/Management Plan/ Monitoring, Workers' Grievances and complaints, Equality, human right and no harassment, Forced and trafficked labor , HCV Assessment/Management Plan/ Monitoring, Peat Conservations (if any), Community/stakeholder engagement, New Planting (if any), Continuous Improvement Plans, Supply Chain elements at POM.</li> </ul>	√	√	√	
		<b>RSPO Supply Chain</b> for CPO mill Verification of documentation				√
	17:00 – 17:30	Interim Meeting	√	√	√	√
Tuesday, 26/06/2018	08:30-12:30	<b>Jendarata Estate</b> Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, SEIA requirement workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area Schedule waste management, Landfill, etc.	√	√	√	
	11:30-12:30	<b>Interview with stakeholders:</b>	√			

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Date	Time	Subjects	(NC)	(VS)	(MH)	(EO)
		Workers, Union Leader, contractor, village rep Community/stakeholder/ affected parties				
	12:30 – 13:30	Lunch / Break	√	√	√	
	13:30 – 17:00	<b>Jendarata Estate</b> <ul style="list-style-type: none"> <li>• Verification of effectiveness of findings closure</li> <li>• Document review P1 – P8: Transparency and commitments, Legal Requirement, Land use rights and compensation, Organization structure and responsibility, Long Term Economic and financial viability, Estate best practices, OHS, Workers training, Pay and contract, Social and Environment Assessment/Management Plan/ Monitoring, Workers' Grievances and complaints, Equality, human right and no harassment, Forced and trafficked labor , HCV Assessment/Management Plan/ Monitoring, Peat Conservations (if any), Community/stakeholder engagement, New Planting (if any), Continuous Improvement Plans, Supply Chain elements at POM.</li> </ul>	√	√	√	
	17:00 – 17:30	Interim Meeting	√	√	√	
Wednesday, 27/06/2018	08:30- 10:30	<b>Seri Pelangi Estate</b> Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, SEIA requirement workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area Schedule waste management, Landfill, etc.	√	√	√	
	10:30 – 12:30	<b>Seri Pelangi Estate</b> <ul style="list-style-type: none"> <li>• Verification of effectiveness of findings closure</li> <li>• Document review P1 – P8: Transparency and commitments, Legal Requirement, Land use rights and compensation, Organization structure and responsibility, Long Term Economic and financial viability, Estate best practices, OHS, Workers training, Pay and contract, Social and Environment Assessment/Management Plan/ Monitoring, Workers' Grievances and complaints, Equality, human right and no harassment, Forced and trafficked labor , HCV Assessment/Management Plan/ Monitoring, Peat Conservations (if any), Community/stakeholder engagement, New Planting (if any), Continuous Improvement Plans, Supply Chain elements at POM.</li> </ul>	√	√	√	
	12:30 – 13:30	Lunch / Break	√	√	√	
	13:30 – 16:45	Continue records review	√	√	√	
	16:45 – 17:15	Prepare for closing meeting	√	√	√	

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Date	Time	Subjects	(NC)	(VS)	(MH)	(EO)
	17:15 – 18:00	Closing meeting	√	√	√	

### Section 3: Assessment Findings

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

- United Plantations Berhad Time Bound Plan
- RSPO Supply Chain Certification Checklist June 2017
- RSPO P&C MY-NIWG 2014 Checklist

#### 3.2 Progress against Time Bound Plan

Time Bound Plan		
Requirement	Remarks	Compliance
<b>Summary of the Time Bound Plan</b>		
Does the plan include all subsidiaries, estates and mills?	PT. Surya Sawit Sejati is a subsidiary company of United Plantations Berhad.  PT Surya Sawit Sejati have operate 1palm oil mill that supplied by 2 core estate (Lada estate and Runtu estate) and 1 scheme smallholders estate (Plasma Kumai and Arut).	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	The RSPO Initial Assessment has been carried out on 11-15 <sup>th</sup> December 2017 and awaiting issuance of certificate.  For more details, please refer to justification of time bound plan as Apendix B	Yes
Is the time bound plan challenging? <ul style="list-style-type: none"> <li>• Age of plantations.</li> <li>• Location.</li> <li>• POM development</li> <li>• Infrastructure.</li> <li>• Compliance with applicable law.</li> </ul>	<ul style="list-style-type: none"> <li>• The time bound plan is challenging as the issuance of HGU is beyond UP Plantation control.</li> <li>• PT Surya Sawit Sejati (PT SSS) is located in Pangkalan Bun, Kotawaringin Barat District, Central Kalimantan Province and was purchased by this company (United Plantations Berhad) early 2007.</li> <li>• 1 palm oil mill that supplied by 2 core estate (Lada estate and Runtu estate) and 1 scheme smallholders estate (Plasma Kumai and Arut).</li> <li>• Infrastructure such as staff and workers quarters, house of worship, sports, kindergarten, creche and medical facilities are provided in the estate.</li> <li>• Personnel in charge to manage the legal documentation system are Legal Department (Led by Ibu Dewi). A system used for tracking any changes in laws and regulations was set-up trough procedure No: SOP-HRD-017-R00.</li> </ul>	Yes
Have there been any changes since the last audit? Are they justified?	No changes since the last audit	Yes
If there have been changes, what circumstances have occurred?	No changes since the last audit	N/A

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Have there been any stakeholder comments?	There is no comments from stakeholders. The company has a complaint and grievance mechanism regulated in stakeholder communication and consultation (SOP-HRD-07-R00) and land conflict procedure (SOP : SSS-COMDEV(HMS)-024).	Yes
Have there been any newly acquired subsidiaries?	No new acquisition	Yes
If yes, have the newly acquisitions certified within a three-year timeframe?	No new acquisition	N/A
Have there been any isolated lapses in implementation of the plan?	No	Yes
<b>Un-Certified Units or Holdings</b>		
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	PT. Surya Sawit Sejati has conducted internal audit for legal compliance and explained the process for evaluate the compliance of regulation.	Yes
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.3.</li> </ul>	The company has identified HCV area for Lada Estate and Runtu Estate in 2008. However, the identification result is not considered sufficient by the company since there is no information on the hectare of HCV area and the location of the identified HCV. Therefore, the company re-identify the HCV area and delineate the HCV area based on HCV identification 2006. The delineation is conducted by Biodiversity Team of the company. Based on the delineation of HCV area there is HCV area that is opened by the company. The company has sent the disclosure of liability and currently has entered to the third stage of RACP process.  In 2014, the company has also conducted HCV identification for smallholder scheme area and Kumai Arut Conservation Area for the area of 1,121.2 ha. However, the area of 49.572 ha is highly potential be opened as housing area of Benaning Bawah Villagers. The information is based on community aspiration to exclude the area from HCV area of Kumai Arut Estate Scheme Smallholder. The company with assigned consultant has approached and counselled local community through FPIC method. The company has consulted to RSPO Jakarta Office on 9 May 2016 in accordance with this situation for RSPO to accommodate community aspiration without disobey RSPO requirement on new area development.  PT Surya Sawit Sejati is under the RaCP. Correspondent with RSPO on 07/05/2018 related to HCV compensation plan submission.	Yes
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings	The company has identified HCV area for Lada Estate and Runtu Estate in 2008. However, the identification result is not considered sufficient by the company since there is no	Yes

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Procedure.	information on the hectare of HCV area and the location of the identified HCV. Therefore, the company re-identify the HCV area and delineate the HCV area based on HCV identification 2006. The delineation is conducted by Biodiversity Team of the company. Based on the delineation of HCV area there is HCV area that is opened by the company. The company has sent the disclosure of liability and currently has entered to the third stage of RACP process.	
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 company has a complaint and grievance mechanism regulated in stakeholder communication and consultation (SOP-HRD-07-R00) and land conflict procedure (SOP : SSS-COMDEV(HMS)-024). The mechanism regulated the flow chart process. It is equipped with complaint form. PT Surya Sawit Sejati is under the RaCP. Correspondent with RSPO on 07/05/2018 related to HCV compensation plan submission.	Yes
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	Procedure for calculating and distributing fair compensation has been in place in the similar document of SOP land compensation No. HRD-015-R00 dated 1 January 2016. It explains that the company has a standard of compensation calculation but also giving the compensated person a bargaining/negotiation position. The record of compensation process and outcome of negotiated agreement is documented. The result of the compensation process is distributed to the compensated party and can be accessed by stakeholder through information request.	Yes
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Personnel in charge to manage the legal documentation system are Legal Department (Led by Ibu Dewi). A system used for tracking any changes in laws and regulations was set-up trough procedure No: SOP-HRD-017-R00.	Yes
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	PT. Surya Sawit Sejati has conducted internal audit for legal compliance and explained the process for evaluate the compliance of regulation.	Yes

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

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?	Not applicable for the certification unit. There is no smallholder scheme attached to the certification unit.	N/A



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**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 1<sup>st</sup> Annual Surveillance Assessment of 2<sup>nd</sup> Recertification cycle, there were eight (8) Major nonconformities and (1) one Minor nonconformity raised. The Jendarata Palm Oil Mill Certification Unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1650872-201804-M1	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 6.5.2 Major
<b>Date Issued</b>	27/06/2018	<b>Due Date</b>	25/09/2018
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	17/09/2018
<b>Statement of Nonconformity</b>	Workers contract is not available.		
<b>Requirement Reference</b>	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.		
<b>Objective Evidence</b>	1) Worker Hashwin A/L Sukumaran at mill was converted to permanent worker from temporary worker. Hashwin started work on 30/01/2017. However after his conversion, the employment contract is not available. 2) Worker Mariyaae at Jendarata Estate has been contracted using the previous Labor Register system which only reference to NUPM/MAPA agreement. However, the register does not explicitly state the recent conditions example, holiday entitlement, reasons for dismissal and period of notice		
<b>Corrections</b>	1) A comprehensive LRR will be developed which comprises of specific applicable laws with person in-charge to ensure the fine lines in each law are complied. In addition, confirmation letter has been issued to all local workers upon their confirmation. 2) In addition to labour register card, an employment contract which clearly states on the pay condition and benefits entitlement for local workers has been developed and issued to local workers with effective of 1 <sup>st</sup> March 2018. The contract is available in local language / language understood by the worker.		
<b>Root Cause Analysis</b>	1) The management did not diligently follow the Legal Requirements Register (LRR) on Employment Act. In the past, it is stated in the offer letter that the probationary period for local workers is minimum 3 months. This probationary period is subject to extend up to 12 months. Within this period, if the worker has been confirmed, there is no confirmation letter provided to the worker as it is understood he/she has been confirmed. However, if he/she is not confirmed, a termination letter will be issued to him/her. The evidence on the		

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	<p>continuity of an employee is the labor register card. This practice has been revised now and a confirmation letter is provided upon confirmation.</p> <p>2) In the past, the labor register card specified only on the compliance with MAPA/NUPW collective agreement. The management did not observe the inclusion of recent pay and benefits condition will leads to significant implication as the pay and benefit of all workers are equal and abide to MAPA/NUPW collective agreement.</p>
<p><b>Corrective Action</b></p>	<p>1) Internal memorandum attached with the confirmation letter and employment contracts have been issued to all estates and departments via email.</p> <p>2) The content of employment contracts has explained to workers and acknowledged by workers.</p> <p>3) Training on Human Rights Policy has conducted regularly which covers prohibition of child labor, trafficked labor, equal treatment, freedom of association and etc.</p> <p>4) Internal audit has conducted to ensure all workers have been issued with employment contracts besides labour register card and ensure above non-compliance shall not be repeated.</p>
<p><b>Assessment Conclusion</b></p>	<p>Corrective action addressed and closed on 17/09/2018.</p> <p>Email communicated by Group Manager HR Mr Mathews on 29/06/2018 to all business unit within UP Group to implement the confirmation letter and employment contract for all local worker was verified.</p> <p>In United Plantations, the company is implementing 12 months probationary for all staff (this includes executive staff).</p> <p>The internal audit criteria have been revised (dated 20/08/2018) to cover Employment contract for all employees including check-roll and contract under indicator 6.5.1. In the previous checklist, it was only focusing on pay-slips for all employees.</p> <p>UP Group had issued an Internal Memo that all business units within Malaysia operations are required to undergo internal audit 3 times per year. The memo was dated 29/08/2018.</p> <p>An on-site assessment has been conducted on 05/09/2018. Interview with managers and local workers confirmed that the employment contracts are explained to workers during employment. The Managers understood the contract agreement implementation. The corrective action deemed to be sufficiently close the finding. The continuous implementation shall be verified again in the next assessment.</p>

Nonconformity			
<b>NCR Ref #</b>	1650872-201804-M2	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 4.7.3 Major
<b>Date Issued</b>	27/06/2018	<b>Due Date</b>	25/09/2018
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	17/09/2018
<b>Statement of Nonconformity</b>	Worker are no provided with appropriate PPE.		
<b>Requirement Reference</b>	All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall		

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	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.
<b>Objective Evidence</b>	The Personal Health Declaration Daily Records shows that workers are being monitored that the appropriate and safe PPE are used. However, Yeasin worker at the Palm Oil Mill was wearing a substandard safety helmet.
<b>Corrections</b>	Approved helmet has been issued to the workers with documented evidence (PPE issuance records with acknowledgement of receipt from the worker). PPE issuance records for the workers has been reviewed. The safety helmet and subsequently safety shoe was issued on 26/07/2018
<b>Root Cause Analysis</b>	The supervisor only inspected on the availability of PPE but did not thoroughly inspect the specification of the safety helmet.
<b>Corrective Action</b>	Training conducted to all supervisors of each station to ensure the PPE inspection checklist are filled with inspection on appropriate PPE with standard specification. The OSH Audit Checklist has been implemented to cross-check to implementation of the PPE.
<b>Assessment Conclusion</b>	Corrective action addressed and closed on 17/09/2018. The training records for the mill supervisors were conducted on 03/09/2018. UP has implemented training evaluation to ensure effectiveness of the training. The records of the evaluation were available for the PPE checklist training. UP has implemented the Occupational Safety and Health Audit Checklist to audit the effectiveness of the PPE usage and meeting the standard specification. The audit is conducted on a monthly basis. The implementation at the mill date 28/08/2018 was verified. Interview during the Onsite closure with the supervisors on 05/09/2018 confirmed that the implementation on the corrective action was effectively implemented. The corrective action deemed to be sufficiently close the finding. The continuous implementation shall be verified again in the next assessment.

<b>Nonconformity</b>			
<b>NCR Ref #</b>	1650872-201804-M3	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 6.1.1 Major
<b>Date Issued</b>	27/06/2018	<b>Due Date</b>	25/09/2018
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	17/09/2018
<b>Statement of Nonconformity</b>	The SIA was not conducted entirely according to the RSPO P&C requirement		
<b>Requirement Reference</b>	A social impact assessment (SIA) including records of meetings shall be documented.		
<b>Objective Evidence</b>	According to the requirements, an SIA is required to be conducted to include factor such as access to rights, economic livelihoods, Subsistence activities, cultural & religious values, health and education facilities, other community values resulting from changes such as improved transport /communication or arrival of substantial migrant labour force.		

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	The Social Risk Assessment conducted in the both mill & estates only includes subsistence activities and employment conditions of the foreign workers.
<b>Corrections</b>	<p>The methodology to conduct SIA is based on the risk matrix (Severity, Quantity/Frequency, Probability). The assessment and management plan were developed with the participation of affected parties/stakeholders at estate/mill level and will be reviewed annually.</p> <p>Group review on SIA has been conducted among all managers and ensure the assessment and management plan fully cover all aspects as per RSPO P&amp;C guidance.</p>
<b>Root Cause Analysis</b>	The SIA was reviewed by respective estates/mills and lack of guidance to conduct comprehensive SIA.
<b>Corrective Action</b>	The adequacy of SIA was discussed during annual sustainability management review and all inputs/requests/grievance raised by stakeholders shall be incorporated in SIA.
<b>Assessment Conclusion</b>	<p>Corrective action addressed and closed on 17/09/2018.</p> <p>The methodology to conduct and review the SIA was provided by the Group Manager HR and ESH on 11/07/2018. The review of the SIA shall follow the index and the index is required to be review together with participation of stakeholders and the inputs from stakeholder to be recorded in the template of meeting minutes.</p> <p>The index of the SIA includes Access and use rights, Economics livelihoods and working conditions, Subsistence activities/amenities, Human Rights, Cultural and religious value, Medical &amp; health facilities, Education facilities and Operational activities. The evaluation criteria of the assessment have been established.</p> <p>The stakeholder meeting conducted at the mill and estates (mill - 02/07/2018; Seri Pelangi 31/07/2018; Jendarata 24/07/2018) and the meeting minutes was verified to confirms the inputs. The SIA has included the inputs from the stakeholders.</p> <p>In addressing the OFI for indicator 6.1.2 and 6.1.3, the SIA has indicated positive and negative impacts; method to mitigate the negative impacts and promotes the positive impacts; management plan developed with stakeholder inputs; responsible person on the management plan and the propose review date on the impacts. The corrective action deemed to be sufficiently close the finding. The continuous implementation shall be verified again in the next assessment.</p>

<b>Nonconformity</b>			
<b>NCR Ref #</b>	1650872-201804-M4	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 5.3.2 Major
<b>Date Issued</b>	27/06/2018	<b>Due Date</b>	25/09/2018
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	17/09/2018
<b>Statement of Nonconformity</b>	Containers are not disposed responsibly		
<b>Requirement Reference</b>	All chemicals and their containers shall be disposed of responsibly.		
<b>Objective Evidence</b>	At Jendarata Estate Division 2 Line site		

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	<p>1) At house B7, the was found that PETRONAS Lubricant Drum was recycled as water storage and lubricant container recycle for washing.</p> <p>2) At house B8, the was found that paint container was recycle.</p>
<b>Corrections</b>	<p>The lubricant and paint containers sighted in both house have been removed and keep in scheduled waste store as SW 409.</p> <p>A comprehensive weekly linesite inspection checklist which entirely cover the chemical/lubricant/paint containers, drain and hygiene of workers quarters, housing compound and composting pit. In addition, the checklist also covers the proper disposal of clinical waste in clinics/group hospitals.</p> <p>Internal memo was communicated by Group Manager HR and ESH on 27/07/2018 on the weekly inspection on disposal of chemical containers. The checklist includes location of linesite, shop houses, office, mill complex, composting pit, hospital, planting fields and other relevant area. The implementation of the checklist was verified at the mill. The implementation started in August 2018.</p>
<b>Root Cause Analysis</b>	<p>The Hospital Assistant (HA) in-charge for weekly linesite monitoring was not diligently inspect the workers quarters as well as housing compound and the inspection checklist was not comprehensive and did not cover the management on scheduled waste disposal.</p>
<b>Corrective Action</b>	<p>A comprehensive weekly linesite / plantations (field) inspection checklist which ensure all chemical/lubricant/paint containers are disposed responsibly (reuse of chemical containers are prohibited except for chemical premix), drain and hygiene of workers quarters, housing compound, composting pit and within the plantations area. In addition, the checklist also covers the proper disposal of clinical waste in clinics/group hospitals.</p> <p>Internal audits will be carried out vigorously by HRESH Team to ensure the findings on the ground including workers' quarters, housing compound, composting pit, clinic/group hospital and all areas within our concession.</p>
<b>Assessment Conclusion</b>	<p>Corrective action addressed and closed on 17/09/2018.</p> <p>The internal audit criteria have been revised (dated 20/08/2018) to cover weekly inspection of fields &amp; others areas within mill/estate concession &amp; weekly inspection of workers and staff quarters, shop houses and office/mill complex. In the previous checklist, there was no specific criteria provided.</p> <p>UP Group had issued an Internal Memo that all business units within Malaysia operations are required to undergo internal audit 3 times per year. The memo was dated 05/09/2018. The continuous implementation shall be verified again in the next assessment.</p>

<b>Nonconformity</b>			
<b>NCR Ref #</b>	1650872-201804-M5	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 4.7.4 Major
<b>Date Issued</b>	27/06/2018	<b>Due Date</b>	25/09/2018
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	17/09/2018
<b>Statement of Nonconformity</b>	Concerns of all parties about health, safety and welfare were not discussed at safety and health committee meeting, and any issues raised were not explicitly recorded.		

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<b>Requirement Reference</b>	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.
<b>Objective Evidence</b>	<p>Jenderata POM  Workplace inspection report did not incorporated in the safety health committee meeting minute dated 28/12/17 and 4/4/18 as no documented report of workplace inspection as to date.</p> <p>Some of the unsafe act/dangerous occurrence observed during site visit at POM was not captured in the latest meeting minute dated 4/4/18:</p> <ol style="list-style-type: none"> <li>1. No hot drain cover for turbine cooling water discharge near clarification station.</li> <li>2. LPG store – oxygen and acetylene cylinder was not securely chained.</li> <li>3. Shovel – safety device malfunction (revolving light, sensor and horn)</li> </ol>
<b>Corrections</b>	<p>The format of the workplace inspection checklist has been utilized by the management to identify all the unsafe act/condition and dangerous occurrence at workplace. OSHA meeting has been conducted and the documented outcomes of inspection is discussed.</p> <p>Drain cover has been constructed for hot water discharge from turbine cooling water.</p> <p>Oxygen and acetylene cylinder in LPG store has been chained at all times.</p> <p>The reverse light, sensor and horn have been repaired and ensure the functionality.</p> <p>The work place inspection was conducted on 28/06/2018 at sterilizer and marshalling yard for mill. The OSH meeting was conducted on 28/06/2018 to discuss the related safety concern raised.</p>
<b>Root Cause Analysis</b>	<p>Format of the workplace inspection checklist has been provided to all business units but Jendarata POM Management failed to follow the protocol and discuss the outcomes of inspection in OSHA meeting.</p> <p>Jendarata POM did not diligently identify the dangerous occurrence in the mill and did not maintain and record the inspection checklist genuinely.</p>
<b>Corrective Action</b>	<p>Training on workplace inspection and vehicle inspection checklist has conducted to ensure the Engineers, Supervisors for every station fully understand and genuinely fill-in the inspection checklist.</p> <p>OSHA internal audits has be carried out by Safety Officer to ensure all business units incorporate and discuss the outcomes of workplace inspection during quarterly OSHA meeting.</p>
<b>Assessment Conclusion</b>	<p>Corrective action addressed and closed on 17/09/2018.</p> <p>The training on work place inspection training was conducted by Mr Ramesh on 28/06/2018. Engineers and supervisors has been interviewed during the onsite closure assessment on 05/09/2018 to confirm</p> <p>The Occupational Safety and Health Audit Checklist has been implemented to audit the housekeeping, building structure, safety signage’s, and meeting the standard specification. The audit is conducted on a monthly basis. The implementation at the mill date 28/08/2018 was verified.</p>



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	<p>In Jendarata estate, the OSH meeting was conducted on 20/06/2018. The work place inspection was conducted 18/06/2018 to identify the risk.</p> <p>The internal audit criteria have been revised (dated 20/08/2018) to OSHA meeting minutes (including discussion on workplace inspection report and monthly OSH inspection checklist). In the previous checklist, there was no specific criteria provided. The continuous implementation shall be verified again in the next assessment.</p>
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Nonconformity			
<b>NCR Ref #</b>	1650872-201804-M6	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 4.7.2 Major
<b>Date Issued</b>	27/06/2018	<b>Due Date</b>	25/09/2018
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	17/09/2018
<b>Statement of Nonconformity</b>	Certain operations where health and safety was not comprehensively risk assessed.		
<b>Requirement Reference</b>	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.		
<b>Objective Evidence</b>	<ul style="list-style-type: none"> <li>i) Turbomiser Spray, last reviewed on 21 April 2017 (main hazard identified: physical injury and fatality. Chemical hazard and illness/occupational poisoning was not identified.</li> <li>ii) Circle spray, last reviewed on 3 April 2017 (main hazard identified: physical injury and chemical exposure)</li> <li>iii) Fertilizer application (mechanical) – last reviewed 3/4/17. (main hazard identified: physical body injury and fatality). Ergonomic hazard and dust/chemical exposure was not identified.</li> <li>iv) Harvesting – last reviewed 3/4/17 (main hazard identified: body injury, fracture). Ergonomic hazard was not identified. and existing control measure is not sufficient (PPE requirement was not included in the SOP, only working tool/sickle cover @ scabbard described as for minimum PPE guideline) - hard hat, covered shoe is not part of the PPE requirement Activity – walking from palm to palm, hazard (hazard – hit by falling dried frond) existing control (training and briefing) – the last hierarchy of control on PPE was not identified.</li> <li>v) Railtrack maintenance – last reviewed on 3/4/17. Main hazard identified – body injury, fatality etc. Hazard not identified – heat stress, working under hot sun/immature area.</li> <li>vi) At Seri Pelangi Estate P&amp;D foliar spray – last review 10/5/18. heat stress, working under hot sun/immature area has not been identified.</li> </ul>		
<b>Corrections</b>	Group review on HIRARC for respective operational activities has been conducted on 9 <sup>th</sup> July 2018 to identify the potential risk related to ergonomic, heat stress, dust and chemical.		

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	<p>HIRARC have been revised and relevant PPEs (Safety helmets for cutters and rubber shoes for cutters, loaders, stakers and loose fruits collectors) have been issued after due trainings. Management possess full commitment to minimize the impacts of head and foot injuries for harvesters.</p> <p>The records of the group review dated 09/07/2018 was verified. The responsible personnel for the respective business unit was present in the review.</p> <p>The revision on the HIRARC and workplace SOP for mill was conducted on 28/07/2018. The revision of the HIRARC included the ergonomic injuries.</p>
<b>Root Cause Analysis</b>	<p>Lack of guidance and knowledge to identify potential risks specifically involving health and ergonomic risks.</p> <p>The training on HIRARC guidelines was not identified in the annual training program.</p>
<b>Corrective Action</b>	<p>Internal audit will be conducted to ensure the training on the HIRARC guidelines has been incorporated in annual training program.</p> <p>Training on the HIRARC guidelines has been conducted by Safety Officer to all Managers and Heads of Department annually.</p>
<b>Assessment Conclusion</b>	<p>Corrective action addressed and closed on 17/09/2018.</p> <p>The HIRARC and SOP training for the mill was conducted on 30/08/2018. The annual training for HIRARC has been included in the annual training program. The training on the HIRARC includes the HIRARC Guidelines issued by the Department of Occupational Safety and Health Ministry of Human Resources 2008.</p> <p>The internal audit criteria have been revised (dated 20/08/2018) to include audit criteria on HIRARC &amp; SOP and training. In the previous checklist, there was no specific criteria provided. The continuous implementation shall be verified again in the next assessment</p>

Nonconformity			
<b>NCR Ref #</b>	1650872-201804-M7	<b>Clause &amp; Category (Major/Minor)</b>	RSPO    SCCS 5.8.2
<b>Date Issued</b>	27/06/2018	<b>Due Date</b>	25/09/2018
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	17/09/2018
<b>Statement of Nonconformity</b>	Training provided to the personnel is not effective.		
<b>Requirement Reference</b>	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.		
<b>Objective Evidence</b>	<p>Training for Supply Chain has been conducted by Mr Goh (Resident Engineer) attended by 14 attendants from various position such as clerk, weighbridge and laboratory assistant.</p> <p>However during the site visit, it was found that the laboratory conductor and weighbridge operator are not having the good understandings and awareness regarding RSPO SCC although has joined the latest SCC training as above.</p>		



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<b>Corrections</b>	Supply chain training has been re-conducted to improve the understanding of workers on supply chain model of Jendarata POM and training evaluation form is filled to ensure the contents of training are effectively delivered to workers. The training was conducted on 05/07/2018. The training slides was verified. The evaluation form shows that the workers involved in the supply chain had understood the requirements.
<b>Root Cause Analysis</b>	Supply chain training has been conducted for weighbridge clerks and lab attendants but the workers hardly remember the supply chain model of Jendarata POM.
<b>Corrective Action</b>	Training evaluation form has be filled after each supply chain training to ensure the workers are fully understand the supply chain procedures especially on supply chain model. The purpose of evaluation form is to examine the level of understanding for trainees (workers) after each training session and future training needs.
<b>Assessment Conclusion</b>	Corrective action addressed and closed on 17/09/2018. The evaluation form was implemented. The training effectiveness was carried by the ESH team on 22/07/2018. The evaluation forms are kept in the mill. During the onsite closure assessment, interview was conducted with weighbridge operator and lab conductor to confirmed the training was provided effectively.

Nonconformity			
<b>NCR Ref #</b>	1650872-201804-M8	<b>Clause &amp; Category (Major/Minor)</b>	RSPO Rules on Market Communications & Claims (version 2016) 4.1
<b>Date Issued</b>	27/06/2018	<b>Due Date</b>	25/09/2018
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	17/09/2018
<b>Statement of Nonconformity</b>	The RSPO Trademark logo was used not following to the Rules on Market Communication & Claims 2016		
<b>Requirement Reference</b>	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.		
<b>Objective Evidence</b>	During the site visit and documentation review, it was found that the 7 CPO storage tanks in Jenderata POM and file documents has the RSPO trademark without the trademark license display. However, based on the 'RSPO Trademark' definition in RSPO Rules on Market Communications & Claims (version 2016), "RSPO Trademark' is defined as: The RSPO registered mark consisting of a rounded palm top accompanied by the letters 'RSPO', the (™) mark and accompanied by a valid license number. Company also only having the Trademark license under Unitata Berhad, (number: RSPO 1106002 valid from 06.10.16-05.10.18), not United Plantation Berhad.		
<b>Corrections</b>	The application on RSPO Trademark License under United Plantations Berhad have been made to RSPO Trademark Department on 28 <sup>th</sup> June 2018. The agreement on RSPO Trademark License was issued with effective from 5 <sup>th</sup> July 2018.		

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	<p>The RSPO round palm logo displayed on the CPO storage tanks will be amended to include the RSPO trademark license number.</p> <p>The RSPO Trademark License was received from RSPO on 06/07/2018. Site verification shows that the logo on the CPO storage tanks has been changed to include the license number.</p>
<b>Root Cause Analysis</b>	<p>Management are not aware that RSPO round palm logo shall be displayed along with the license number as is for off-products labelling and not for on-products/promotional purposes.</p>
<b>Corrective Action</b>	<p>During the group review on SIA, EIA and HIRARC meeting, briefing on the use of RSPO round palm logo with license number was conducted for all Managers and Heads of Department.</p> <p>All requirements as stipulated in Rules on Market Communication &amp; Claims 2016 hasbe included as audit scope during supply chain internal audit to ensure the supply chain practices are comply to SCCS June 2017 and Rules on Market Communication &amp; Claims 2016.</p>
<b>Assessment Conclusion</b>	<p>Corrective action addressed and closed on 17/09/2018.</p> <p>The group review was conducted on 09/07/2018. Interview with the managers (Mr Goh) and assistance managers (Mr Mohd Faizul, Mr Mugilan) confirmed the understanding on the RSPO communication.</p> <p>The RSPO Supply Chain internal audit report summary template had included the requirement on the RSPO Rules on Market Communication and Claims.</p>

Nonconformity			
<b>NCR Ref #</b>	1650872-201804-N1	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 2.1.3 Minor
<b>Date Issued</b>	27/06/2018	<b>Due Date</b>	Next annual surveillance
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	17/09/2018
<b>Statement of Nonconformity</b>	Evidence of compliance for some of the conditions stipulated in Compliance Schedule (Jadual Pematuhan) [ref.: License No. 004239] was not adequately demonstrated.		
<b>Requirement Reference</b>	A mechanism for ensuring that compliance shall be implemented.		
<b>Objective Evidence</b>	<p>Legal compliance status were not adequately demonstrated:</p> <ul style="list-style-type: none"> <li>At JPOM, the visual records of the CCTV that pointing to chimney No. 7 (boiler 1) for the past 3 months was not able to be retrieved. The oldest record was on 20/5/2018 [ref.: item 30 of DOE's compliance schedule].</li> <li>It was found that the smoke density meter alarm was only triggered at 53% opacity and the smoke sensor was only able to give reading at maximum 23% opacity [ref.: item 26 of DOE's compliance schedule].</li> <li>At Seri Pelangi Estate, the application to renew the permit to store diesel and petrol was only done on 22/3/2018 i.e. after the permit had expired (2/3/2018). Based on requirement, the application of renewal must be made one month before expiry.</li> </ul>		

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<p><b>Corrections</b></p>	<p>An external storage device has been installed to the decoder specifically for chimney's CCTV to enable retrieval of visual records for at least 3 months.</p> <p>Jendarata POM management has engaged the equipment supplier to carry out the calibration procedures and to ensure the smoke density meter alarm will trigger at 40%.</p> <p>Jendarata POM management will conduct regular check on the visual records of CCTV facing chimney.</p> <p>Jendarata POM management will regularly engage with equipment supplier to carry out the calibration procedures.</p> <p>The new external storage device was installed in July 2018. The purchase order was raised on 30/06/2018.</p> <p>The regular check on the CCTV and the smoke density is recorded in the Boiler Operation Log</p> <p>Due to server down on KPDNKK website, application have been submitted successfully on 22<sup>nd</sup> March 2018. Payment on the renewal has been paid and Bomba has carried out the inspection.</p> <p>The permit A035787 validity from 23/07/2018 – 22/07/2019 was verified to confirm the obtaining of permit.</p> <p>A training session will be conducted with the respective person in-charge of the requirements stipulated in the DOE compliance schedule.</p> <p>Training records for the respective person-in-charge was conducted on 11/08/2018.</p>
<p><b>Root Cause Analysis</b></p>	<p>The existing external data storage device was shared among other equipment for visual records previously. Therefore, the new visual records for chimney was overwriting once achieve maximum storage.</p> <p>The smoke density meter alarm was triggered and adjusted by non-competent personnel during audit.</p> <p>The management did not diligently follow the fine lines in the permit (DOE compliance schedule).</p> <p>The permit renewal application for storage of diesel and petrol have been made via online but the application was failed due to upgrading of the KPDNKK website (server down).</p>
<p><b>Corrective Action</b></p>	<p>Improve the summary matrix of all permits by indicating renewal of permits 2 months prior to the expiry date and additional column indicating the date of renewed permits and person in-charge.</p> <p>Internal audits will be carried out to ensure all permits renewal are submitted to relevant authorities 2 months before the expiry date. Thus, the management expected to obtain the renewed permits before the permits expired even though due to some unforeseen circumstances eg. Online application system / server down.</p> <p>The group Legal Requirement Register will be reviewed.</p>
<p><b>Assessment Conclusion</b></p>	<p>Corrective action addressed and closed on 17/09/2018.</p> <p>The Summary of Permits &amp; License monitoring has been revised to "3 months prior to expiry date" to ensure that application is made at least 3 months in advance.</p> <p>The person in-charge for the respective licenses is included in the summary.</p>

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	<p>The internal audit criteria have been revised (dated 20/08/2018) to include audit criteria on Legal compliance and summary of permits &amp; licenses. In the previous checklist, there was no specific criteria provided.</p> <p>The Legal Requirement Register has been reviewed on 13/08/2018. The revise LRR had included column "Status of Compliance by Estate/Mill Management" for compliance check.</p>
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<b>Opportunity for Improvements</b>	
<b>OFI #</b>	<b>Description</b>
<b>OFI 1</b>	<p>1650872-201804-I1</p> <p>Indicator 6.1.2, 6.1.3 &amp; 6.1.4</p> <p>Details : Subsequent to the 6.1.1 related indicators, 6.1.2., 6.1.3 and 6.1.4 is yet to be assessed to be sufficient by the assessment team. Indicator 6.1.2-6.1.4 shall be assessed together while conducting the NC closing of 6.1.1.</p>
<b>OFI 2</b>	<p>1650872-201804-I2</p> <p>Indicator 5.2.1</p> <p>Details : The term "High Conservation Value (HCV)" has to be used accurately. The certification unit needs to relook its classification of conservation area.</p>

<b>Positive Findings</b>	
<b>PF #</b>	<b>Description</b>
<b>PF 1</b>	Top down commitment for RSPO implementation.

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

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	2017.01	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 1.1. Minor
<b>Date Issued</b>	07/04/2017	<b>Due Date</b>	27/06/2018
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	27/06/2018
<b>Statement of Nonconformity</b>	The company had not updating the stakeholder list accordingly		
<b>Requirement Reference</b>	There shall be evidence that growers and millers provide information upon request for information on (environment, social and/or legal) issues relavnt to RSPO Criteria to relavant stakeholders for effective participation in decision making		
<b>Objective Evidence</b>	Based document verification of land dispute complaint letter auditor team have found there is an oil palm company name have not sighted and updated in the Seri Pelangi Stakeholder list.		

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	Based on the verification on site audit, the personnel had shown a stakeholder list for 2017 however the list has not been updated.
<b>Corrections</b>	No provided by Mutu Agung (Previous CB)
<b>Root Cause Analysis</b>	No provided by Mutu Agung (Previous CB)
<b>Corrective Action</b>	No provided by Mutu Agung (Previous CB)
<b>Assessment Conclusion</b>	The stakeholder list has been updated. The internal audit records shows that the indicator has been included as audit requirements.

Nonconformity			
<b>NCR Ref #</b>	2017.02	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 2.2.2 Minor
<b>Date Issued</b>	07/04/2017	<b>Due Date</b>	27/06/2018
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	27/06/2018
<b>Statement of Nonconformity</b>	The certification unit has not consistently mentioned the boundary marker/stones in their operations area.		
<b>Requirement Reference</b>	There is evidence that physical markers are located and visibly maintained along the legal boundaries particularly adjacent to state land, NCR land and reserves.		
<b>Objective Evidence</b>	Auditor team field observation at Jenderata estate found all the boundary poles that have taken as a sample (6 poles) were visibly maintained along the legal boundaries However, during the field visit at Seri Pelangi estate there were 2 boundary poles not sighted and 1 pole was broken from 10 poles taken as sample. This also contradict with the information provided in the Boundary Store Maintenance Monthly Upkeep Checklist that stated all the 25 boundary poles available and maintained.  This findings is grade as minor nonconformity non-systematic failure due to it is an isolated case.		
<b>Corrections</b>	No provided by Mutu Agung (Previous CB)		
<b>Root Cause Analysis</b>	No provided by Mutu Agung (Previous CB)		
<b>Corrective Action</b>	No provided by Mutu Agung (Previous CB)		
<b>Assessment Conclusion</b>	Based on site visit, all the boundary poles were found to be well maintained. Among the information that can be seen printed on the pole was GPS coordinates and pole number. There was no recurrence of non-conformity and thus the corrective action implementation was effective.		

Nonconformity			
<b>NCR Ref #</b>	2017.03	<b>Clause &amp; Category (Major/Minor)</b>	Indicator 5.3.2 Major
<b>Date Issued</b>	07/04/2017	<b>Due Date</b>	Prior to Certificate issued
<b>Closed (Yes/No)</b>	Yes	<b>Date of nonconformity closure</b>	29/08/2017

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<b>Statement of Nonconformity</b>	No provided by Mutu Agung (Previous CB)
<b>Requirement Reference</b>	All chemicals and their containers shall be disposed of responsibly
<b>Objective Evidence</b>	<p>During the Recertification audit at Jendarata Estate, the personnel in charge had shown the consignment note of syringe and swabs had been disposed of to the registered collector (Sharp and Bins)</p> <p>Based on Malaysian Environmental Quality Act 1974, Scheduled waste Regulations 2005, Regulation 3(1) every waste generator shall, within 30 days from the date of generation of scheduled wastes, notify the Director General of the new categories and quantities of scheduled wastes which are generated.</p>
<b>Corrections</b>	<p>The clinical waste (SW 404) from Jendarata Group Hospital were disposed to Clinco Waste Management Sdn Bhd. Clinco Waste Management Sdn Bhd which appointed by Kualiti Alam Sdn Bhd with effective of 27<sup>th</sup> March 2015. Kualiti Alam Sdn Bhd possess valid DOE license to collect clinical waste from Jendarata Group Hospital on 8<sup>th</sup> June 2017. Furthermore, The inventory is updated through online system by end of each month. Quantity of clinical waste generated to date for month of July is 0.0020 metric tonnes.</p> <p>Furthermore, management had invited Department of Environment (DOE) to conduct training on Scheduled Waste Management in accordance to Environment Quality (Scheduled Waste) Regulation 2005 and electronic Scheduled Waste Information System (eSwiss)</p> <p>The training was conducted by Department of Environment (DOE) Teluk Intan, Perak on 17<sup>th</sup> August 2017. Total of 38 participants from all business units which companies of representatives from all estates, mills, refinery, Company Group Hospitals, Research Unit (UPRD) and Sustainability Team</p>
<b>Root Cause Analysis</b>	Lack of awareness on personnel who handling the scheduled waste (SW 404-Clinical Wastes) and understanding on electronic Scheduled Waste Information (eSWIS) need to be further improved.
<b>Corrective Action</b>	Internal audit will be conducted more rigorously by Sustainability team to ensure all business units maintain complete an up-to-date record keeping on scheduled waste inventory and disposal. This includes valid DOE license of waste manager, monthly updates of inventory and submission of consignment note once scheduled waste being disposed to waste manager.
<b>Assessment Conclusion</b>	During the ASA2_1 assessment, based on site visit at Jendarata's clinic, the clinical wastes were disposed through authorised vendor (see 5.3.3). The person in-charge was also found to be able to explain on what it takes to be an authorised collector and able to demonstrate how to fulfil the regulation requirements. There was no recurrence of non-conformity and thus the corrective action implementation was effective.

<b>Opportunity for Improvement</b>	
<b>OFI#</b>	<b>Description</b>
OFI 1	<p><b>Indicator 1.3</b>            Ensure the socialization of code of business conduct to being communicated to all levels of workforce including third party contractors</p> <p>ASA2_1 status:</p>

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	Based on interview, it was confirmed that the code of business conduct has been socialized through the Worker handbook and Stakeholder Handbook.
OFI 2	<p><b>Indicator 5.3.1</b>  The segregation of waste at composting area to be done regularly</p> <p>ASA2_1 status:  Based on the site visit at landfill area at both estates, the segregation of wastes like plastic and metal was done regularly.</p>
OFI 3	<p><b>Indicator 5.3.3</b>  Ensure the company monitoring and updating the notification of scheduled waste according to EQA 1974 regulation 2005</p> <p>ASA2_1 status:  Verification of DOE’s Second Schedule (Notification to DOE) and Fifth Schedule (Inventory of SW) showed that the operating units have been monitoring and updating their movement of SW very closely. The records data found to be consistent with the physical stocks.</p>

**3.4.2 Summary of the Nonconformities and Status**

CAR Ref.	CATEGORY (MAJOR/ MINOR)	ISSUED	STATUS & DATE (Closure)
2017.01	Minor – 1.1.1	25/05/2017	Closed out on 26/08/2018
2017.02	Minor – 2.2.2	27/05/2017	Closed out on 26/08/2018
2017.03	Major – 5.3.2	07/04/2017	Closed out on 29/08/2017
1650872-201804-M1	Major – 6.5.2	27/06/2018	Closed out on 17/09/2018
1650872-201804-M2	Major – 4.7.3	27/06/2018	Closed out on 17/09/2018
1650872-201804-M3	Major – 6.1.1	27/06/2018	Closed out on 17/09/2018
1650872-201804-M4	Major – 5.3.2	27/06/2018	Closed out on 17/09/2018
1650872-201804-M5	Major – 4.7.4	27/06/2018	Closed out on 17/09/2018
1650872-201804-M6	Major – 4.7.2	27/06/2018	Closed out on 17/09/2018
1650872-201804-M7	Major – SCCS 5.8.2	27/06/2018	Closed out on 17/09/2018
1650872-201804-M8	Major – RSPO Rules on Market Communication & Claims (version 2016) 4.1	27/06/2018	Closed out on 17/09/2018
1650872-201804-N1	Minor 2.13	27/06/2018	Closed out on 17/09/2018



**3.5. Stakeholders Consultation**

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

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

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

<b>List of Stakeholders Contacted</b>	
<p><b>Internal Stakeholders</b></p> <p>Workers Representative Guest workers representative Gender Committee Mill Operators Sprayer Harvester</p>	<p><b>Union/Contractors/Local Communities</b></p> <p>NUPW Contractor Local Farmer Gocery shop owner</p>
<p><b>Government Departments</b></p> <p>No government department was contacted this assessment</p>	<p><b>NGO</b></p> <p>Malaysia Natural Society (MNS) – by email communication</p>


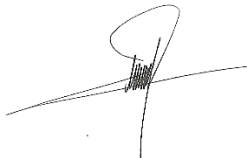


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IS #	Description
1	<p><b>Feedbacks: Guest workers' (foreign worker) representative (India, Bangladesh, Indonesia, Nepal)</b></p> <ol style="list-style-type: none"> <li>Jendarata Plantations has provided them sufficient place to stay.</li> <li>In case of any damage to the house, it is fixed at no cost.</li> <li>They are given sufficient work and no discrimination.</li> </ol> <p><b>Management Responses:</b></p> <p>The documented records for housing repairs are maintained and all repair costs are bear by the Company. All repairs will be done as soon as possible upon requests.</p> <p>The management adhere to the Company's Human Rights Policy where all employees are treated fairly and protected from any forms of discrimination.</p> <p><b>Audit Team Findings:</b></p> <p>No findings raised</p>
2	<p><b>Feedbacks: NUPW Jendarata Representative</b></p> <ol style="list-style-type: none"> <li>There is no restriction imposed by the company to workers to join the Union.</li> <li>Company has been supportive and allowing meeting between workers.</li> <li>Jendarata Plantations has given access to the local community to the religious temple located within the plantations.</li> </ol> <p><b>Management Responses:</b></p> <p>The Management adhere to the Company's Human Rights Policy where the management shall respect the rights of all personnel to form, join and participate in registered trade unions and to bargain collectively.</p> <p>The local communities besides our employees have free access to any temples within our concession.</p> <p><b>Audit Team Findings:</b></p> <p>No findings raised</p>
3	<p><b>Feedbacks: Shop owners</b></p> <ol style="list-style-type: none"> <li>Shop rental contract is available with the Jendarata</li> <li>Running business at risk due to some workers do not pay up after taking grocery at the shop</li> </ol> <p><b>Management Responses:</b></p> <p>The business risk lies beyond the control of estate management. The shop owner shall only offer the credit payment system to workers who maintain long-term relationship and regular on-time payment with shop keeper. The management monitors the prices of sundry goods from time to time.</p> <p><b>Audit Team Findings:</b></p> <p>No findings raised</p>
4	<p><b>Feedbacks: Contract workers Supplier</b></p> <ol style="list-style-type: none"> <li>Payment from Jendarata is prompt</li> <li>Have been always invited for stakeholder meetings to discuss issues</li> <li>In case of any issues, it is always able to discuss with the estate managers.</li> <li>Contractor Lim Pooi Lian does not understand what is stated in the external stakeholder handbook as it is in Malay. Preferable to have it in Mandarin or at least been explained by the company.</li> </ol> <p><b>Management Responses:</b></p>

	<p>All stakeholders including government agencies, NGOs, suppliers, contractors and neighbouring communities are invited for annual stakeholders meeting. They are always welcome to share or highlight their concern to the management. All requests or grievances will be resolved in an open, transparent and consultative manner.</p> <p>Currently the management have stakeholders booklet in English and Bahasa Malaysia and its content are explained to the stakeholders in vernacular languages.</p> <p>The management will improve the effectiveness of communication during stakeholders meeting by obtaining an assistance of a Chinese speaking participant to explain the content of stakeholders booklet accordingly.</p>
	<p><b>Audit Team Findings:</b>          No findings raised</p>
<b>5</b>	<p><b>Feedbacks: Farmers at Seri Pelangi Estate</b></p> <ol style="list-style-type: none"> <li>1. Jendarata Plantations has rented lands for their planting.</li> <li>2. There is not any land dispute.</li> </ol>
	<p><b>Management Responses:</b></p> <p>The farmers who operate under the rentice are part of stakeholders for Seri Pelangi Estate and management maintain effective communication with the farmers.</p>
	<p><b>Audit Team Findings:</b>          No findings raised</p>
<b>6</b>	<p><b>Feedbacks: Smallholders</b></p> <ol style="list-style-type: none"> <li>1. Roads and bridge has been provided to the smallholders within the Jendarata Plantations estates to help the smallholder for accessibility.</li> <li>2. There is not dispute with Jendarata Plantations</li> </ol>
	<p><b>Management Responses:</b></p> <p>Besides providing free road access to the adjoining smallholders, the management also carry out regular road maintenance and ensure the bridge is in good condition all the times.</p>
	<p><b>Audit Team Findings:</b>          No findings raised</p>
<b>7</b>	<p><b>Feedbacks: Local NGOs and NUPW</b></p> <ol style="list-style-type: none"> <li>1. Malaysia Natural Society would like to revisit the subject of determining the impacts of the estate and its environment on the safety of the ERT bird species and its global population and/or status subject. If such species are present and/or seen using for various reasons (roosting, nesting, breeding, etc.), a management prescription is required to ensure the safe habitat (for resident species) and passage (for migratory species) within are maintained and managed.</li> <li>2. NUPW would like to continue to be invited for the annual stakeholder’s meeting to provide their inputs.</li> </ol>
	<p><b>Management Responses:</b></p> <p>The estate management will re-invite Malaysia Natural Society to identify the impacts of estate and its environment on the status and safety of ERT bird species.</p> <p>The estate management will invite all stakeholders including the representative from NUPW Perak Branch for annual stakeholders meeting so as to discuss all concerns in transparent and consultative manner.</p>
	<p><b>Audit Team Findings:</b>          No findings raised</p>

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<b>Formal Signing-off of Assessment Conclusion and Recommendation</b>	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Jendarata Palm Oil Mill Certification Unit has complied with the RSPO P&amp;C MYNI 2014 &amp; 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 Jendarata Palm Oil Mill Certification Unit is continued.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name:</b> <b>Nicholas Cheong</b>	<b>Name:</b> <b>C. Mathews</b>
<b>Company Name:</b> <b>BSI Services Malaysia Sdn Bhd</b>	<b>Company Name:</b> <b>United Plantations Berhad</b>
<b>Title:</b> <b>Lead Auditor</b>	<b>Title:</b> <b>Group Manager                      Human Resources and Environment, Safety &amp; Health</b>
<b>Signature:</b> 	<b>Signature:</b> <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p> 
<b>Date: 29/10/2018</b>	<b>Date: 29/10/2018</b>

**Appendix A: Summary of Findings**

Criterion / Indicator		Assessment Findings	Compliance
<b>Principle 1: Commitment to Transparency</b>			
<b>Criterion 1.1:</b> Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	The stakeholder list sighted for this assessment are the Jendarata POM stakeholder list 2018 and Seri Pelangi Estate 2018 which includes Guest workers, NGOs, Government agencies, Schools and internal local community.  The Stakeholder Handbook and the employee handbook distributed contains the method and procedure for information request. Interview with the stakeholders confirmed that they received the handbook.	Complied
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	The person responsible for communication with the local external stakeholders is Mr P. Rajasegaran. For the national/international external stakeholder, the responsible person for communication is Company Secretary.  For 2017/2018, there was no request at the mill and Seri Pelangi Estate.	Complied
<b>Criterion 1.2:</b> Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			
1.2.1	Publicly available documents shall include, but are not necessary limited to: <ul style="list-style-type: none"> <li>• Land titles/user rights (Criterion 2.2);</li> <li>• Occupational health and safety plans (Criterion 4.7);</li> <li>• Plans and impact assessments relating to environmental and social impacts</li> </ul>	UP Bhd has communicated its Policy on Documents that can be Publically made available dated 11/01/2014 undersigned by Chief Executive Director through the United Plantations Berhad website <a href="http://unitedplantations.com/sustainability/pdf/Policy%20on%20Documents.pdf">http://unitedplantations.com/sustainability/pdf/Policy%20on%20Documents.pdf</a> and through the stakeholders handbook and workers handbook.  The Policy includes Land titles / user rights; Occupational health and safety plans; Plans and impacts assessment relating to encironmentand social	Complied

	<p>(Criteria 5.1, 6.1, 7.1 and 7.8);</p> <ul style="list-style-type: none"> <li>• HCV documentation (Criteria 5.2 and 7.3);</li> <li>• Pollution prevention and reduction plans (Criterion 5.6);</li> <li>• Details of complaints and grievances (Criterion 6.3);</li> <li>• Negotiation procedures (Criterion 6.4);</li> <li>• Continual improvement plans (Criterion 8.1);</li> <li>• Public summary of certification assessment report;</li> <li>• Human Rights Policy (Criterion 6.13).</li> </ul> <p>- Major compliance –</p>	<p>impacts; HCV documentations; details of complaints and grievances; negotiation procedures; continual improvement plans; public summary of SPO certification assessment report and human rights policy.</p> <p>Interview with both internal and external stakeholders confirmed that the Handbook has been disseminated.</p> <p>Until the assessment, there was no request for information.</p>	
<b>Criteria 1.3:</b> 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.</p> <p>-Minor compliance</p>	<p>The code of conduct and business ethics has been undersigned by CEO Dato Carl Bek-Nielsen on 08/12/2016. The code is translated to various languages (e.g. Hindi, Tamil and Indonesian).</p> <p>The code is being briefed to the workers including foreign workers at the point of employment. Example – for Bangladesh workers (G2G program), it is being briefed when they arrived to Malaysia; for Bangladesh workers (G2G Plus Program), it is being briefed during the interview process at Dhaka.</p> <p>The presentation materials has been sighted. The workers have been interviewed to confirmed that the code of conduct has been briefed to them at Dhaka (for G2G plus) while for G2G it has been briefed upon arrival.</p>	Complied
<b>Principle 2: Compliance with applicable laws and regulations</b>			
<b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p>Evidence of compliance with relevant legal requirements shall be available.</p> <p>- Major compliance -</p>	<p>Evidence of compliance with relevant legal requirements were demonstrated for Jenderata POM Management Unit. Sighted sample of permits and licenses. License and permit sampled:</p>	Complied

		<p>i) Akta Kemudahan and perkhidmatan Jagaan Kesihatan Swasta 1998, Group hospital license, no. license: 130807-00306-01/2018 serial number : 003993 valid until 23 February 2020</p> <p>ii) Machinery certificate of fitness (hoist, UPV and SB)          PK PMA 1641 valid until 28/8/18          PK PMA 279 valid until 28/8/18          PK PMD 240 valid until 15/4/19          PK PMD 80102 valid until 11/5/19          PMT 6860 valid until 28/8/18          PMT 72445 valid until 28/8/18          PK PMT 9591 valid until 28/8/18</p> <p>Last mill inspection was carried out on 16/1/18.</p> <p>iii) MPOB license, 508108704000 valid until 31/3/19.</p> <p>iv) Diesel and petrol permit, serial no. A021701, reference no. TI/SK/066(03) valid until 8/11/18</p> <p>v) Energy Commission (EC) license for generators, refer to permit reference, ST(PIP)P/S/PRK/01418 for 11kV genset (biomass boiler) valid until 12/6/18.</p> <p>Jendarata Certification Unit is committed to compliance with all applicable local, national and ratified international laws and regulations. Among the evidence sampled for legal compliance were:</p> <ul style="list-style-type: none"> <li>• DOE's Compliance Schedule (<i>Jadual Pematuhan</i>) [License No.: 004233, validity 1/7/2017 to 30/6/2018, 50 mt/hr, disposition method: water ways and land application]</li> <li>• Quarterly returns to DOE were sent without fail. Based on laboratory analysis reports, all BOD readings of final discharge were below 5,000 mg/l since the last assessment.</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Diesel permit #TI/SK/014(03), licensee: UPB, Seri Pelangi Estate, diesel=15,000lt, petrol=400 lt, validity 3/3/2017 to 2/3/2018. Sri Pelangi has applied for renewal on 22/3/2018 based on letter issued from Co.'s Secretary to KPDNKK. However, the reason for the delay of application was not known. NCR was raised under 2.1.3.</li> <li>• MPOB License #5022207202000, <i>menjual dan mengalih FFB</i>, validity 1/11/2017 to 31/10/2018, Licensee: United Plantations Bhd., Ladang Seri Pelangi, area: 1,337.40 Ha – next renewal of license expected to be 1,337 Ha</li> </ul>	
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	The CU continued to implement and maintain their established documented system for identifying, accessing, tracking updates and monitoring of compliance with the legal requirements that are applicable to the CU's operation. Each office of the operating unit (mill and estates) has its own legal register and were being evaluated individually from time to time for compliance mainly through internal audit. Among the applicable legal laws registered are EQA, OSHA, Factory & Machinery Act, Employment Act, Workers' Minimum Standard of Housing and Amenities Act, to name a few.	Complied
2.1.3	A mechanism for ensuring compliance shall be implemented. - Minor compliance -	The CU has various mechanisms to ensure the legal requirements are complied with. Among the mechanisms verified were: <ul style="list-style-type: none"> <li>- In LRR format there is a column to report the status of compliance which was utilised to report the compliance status of all the applicable legal requirements. Other information available in the format was document/action plan needed, PIC and frequency of monitoring</li> <li>- There was a list of licenses which have the information about type of license, expiry date and validity period</li> </ul> However, some of the legal compliance status were not adequately demonstrated, such as:	Minor Non-compliance

		<ul style="list-style-type: none"> <li>- At JPOM, the visual records of the CCTV that pointing to chimney No. 7 (boiler 2) for the past 3 months was not able to be retrieved. The oldest record was on 20/5/2018 [ref.: item 30 of DOE's compliance schedule].</li> <li>- It was found that the smoke density meter alarm was only triggered at 53% opacity and the smoke sensor was only able to give reading at maximum of 23% opacity [ref.: item 26 of DOE's compliance schedule].</li> <li>- At Seri Pelangi Estate, the application to renew the permit to store diesel and petrol was only done on 22/3/2018 i.e. after the permit had expired (2/3/2018). Based on requirement, the application of renewal must be made one month before expiry.</li> </ul> <p>Thus a minor non-conformity was assigned due to this lapse.</p>	
2.1.4	<p>A system for tracking any changes in the law shall be implemented.</p> <p>- Minor compliance -</p>	<p>The Company Secretary [Mr. Eng Ho (HQ)] is given the responsibility to track and update any changes in the law. Among the method or platforms used for tracking are:</p> <ul style="list-style-type: none"> <li>• Internet subscription such as Lawnet.com</li> <li>• News and announcement from statutory bodies and government departments such as SOCSO, EPF, etc.</li> <li>• Participation of associations and seminars such as Malayan Agricultural Producers Association (MAPA), Malaysian Palm Oil Association (MPOA)</li> </ul> <p>Ever since the last assessment, among the new updates registered were:</p> <ul style="list-style-type: none"> <li>- 0% GST</li> <li>- Employment Insurance System Bill 2017</li> </ul>	Complied
<p><b>Criterion 2.2:</b> 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.</p>			



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 -	Sri Pelangi Estate was able to demonstrate its right to use the land through possession of land titles. There were 5 land titles all together with a total area of 1,421.7526 Ha. The land titles verified were PN361064, PN361063, GM1201, GM1202 and PN361065.	Complied
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	Demarcation of boundaries at both visited estates was well maintain especially the boundaries with third parties. A few methods were applied such as concrete pegs white colour (printed info of GPS coordinates), trenches, roads and barb wire fencing.	Complied
2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	There was a dispute dated 07/04/2016 with Jasa Budiman Estate on Temporary Occupation License (TOL) land issue. The issue has not been resolved due to no response received from owner of Jasa Budiman. UP last communication with Jasa Budiman was on 14/06/2018. TOL land is land issued by government for temporary usage. UP had also submitted TOL Land application. TOL land does not belongs to any party and the license of renewal is subject to the State Government approval. For this claim, it is not related to land acquisition. Hence the FPIC is not associated to this dispute.	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	As stated in 2.2.3, there was land dispute on government TOL land. UP had tired is very best to engage with complainant. However there was no response.	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	As stated in 2.2.3, the land dispute was on government TOL land. The land dispute is not related to the UP taking up land belongs to community. TOL land belongs to state government and the government on a yearly basis will grant the land for temporary use.	Complied

2.2.6	<p>To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations.</p> <p>-Major compliance</p>	<p>UP has invited Jasa Budiman for resolution. However, the affected party had not responded to UP.</p>	Complied
<p><b>Criterion 2.3:</b> Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.</p>			
2.3.1	<p>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).</p> <p>- Major compliance -</p>	<p>No legal and customary land was identified for this certification. However, user rights was given by UP to the surrounding community to utilize the Indian Temple located within the UP vicinity. The stakeholders was interviewed to confirm use access was given and there were no customary land at the certification unit.</p>	Complied
2.3.2	<p>Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include:</p> <p>a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making;</p> <p>b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken;</p> <p>c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land.</p> <p>- Minor compliance -</p>	<p>There is no new planting for the certification unit. Hence no copies of agreement is available.</p>	Complied

2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	There is no new planting for the certification unit. Hence the relevant information is not available.	Complied																											
2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	There is no new planting for the certification unit. Hence the relevant information is not available.	Complied																											
<b>Principle 3: Commitment to long-term economic and financial viability</b>																														
<b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.																														
3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -	The visited estates were able to demonstrate their business or management plan through establishment of annual budget with projection of three years (2019 to 2021). The budgeted expenses includes harvesting, manuring, weeding, road maintenance, railway maintenance, drain maintenance and conservation to name a few. Estimated crop was also available. Verification of the budget showed that the average operational cost is RM550/mt CPO and RM3,000/Ha.	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 -	Both visited estates have established their replanting program with minimum of 5 years projection. Verification of the programme showed the following: <table border="1" data-bbox="1048 1129 1899 1313"> <thead> <tr> <th rowspan="2">Estates</th> <th colspan="6">Replanting area (Ha)</th> </tr> <tr> <th>2018</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> </tr> </thead> <tbody> <tr> <td>Jenderata</td> <td>364.80</td> <td>299.90</td> <td>282.20</td> <td>298.74</td> <td>248.16</td> <td>139.60</td> </tr> <tr> <td>Vs.</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Estates	Replanting area (Ha)						2018	2019	2020	2021	2022	2023	Jenderata	364.80	299.90	282.20	298.74	248.16	139.60	Vs.							Complied
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			172 completed (64 for coconut)						
		Seri Pelangi	321 Vs. 129 completed as at 16/6/18	212	320	0 (oldest palms planted in year 2000)	0	0	

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

**Criterion 4.1:** Operating procedures are appropriately documented, consistently implemented and monitored.

4.1.1	Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	<p>There is a standard SOP prepared for the whole UP Estates and Mills. SOP latest revised on December 2016. SOP covered all aspects of Mill Operation and 16 SOPs were listed with additional SOP developed specially for Biogas Plant. The SOP copy is available in the Mill office and observed implemented accordingly.</p> <p>Agriculture best practice for the certification unit was guided by Standard Operating Procedures (Manual) (supplements)[approved by Ho Dua Tiam, Sr. Executive Director, dated 10/12/2007] which contents the following operations:</p> <ul style="list-style-type: none"> <li>• Nursery</li> <li>• Replanting</li> <li>• Upkeep mature/immature oil palm</li> </ul>	Complied
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		<ul style="list-style-type: none"> <li>• Water management</li> <li>• Roads – Paths, Railway locomotive, Railway track</li> <li>• Boundaries</li> <li>• Oil palm pest management</li> <li>• Manuring immature &amp; mature oil palm</li> <li>• Harvesting collection</li> </ul>	
4.1.2	<p>A mechanism to check consistent implementation of procedures shall be in place.</p> <p>- Minor compliance -</p>	<p>Mechanism to check consistent implementation of procedures is through internal audit by HRESH team on 15/5/18. 6 non-compliances recorded with regards to P&amp;C indicators and ESH together with 6 OFI for improvements. Follow up audit was carried out 13/6/18 and all finding raised have been closed effectively.</p> <p>The mechanism of checking the consistent implementation was mainly carried out through field supervision by field staff, executive and managers.</p>	Complied
4.1.3	<p>Records of monitoring and any actions taken shall be maintained and available, as appropriate.</p> <p>- Minor compliance -</p>	<p>Records of monitoring with regards to EHS and RSPO implementation are maintained and available for verification. Sample of records checked:</p> <p>i. Inspection report by Competent Electrical Engineer, JK-T-5-B-0043-1996. Refer to report dated 26/4/18.</p> <p>ii. Internal audit report dated 15/5/18 by HRESH Department.</p> <p>Records of monitoring were properly maintained by the estates for example, at Jenderata Estate the harvesting quality inspected by the checkers through utilisation of form UPB No. 28 – sampled: UPB No 28 dated 4/6/2018, field 86, 87 by Ms Kanniga.</p>	Complied
4.1.4	<p>The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB).</p> <p>- Major compliance -</p>	No 3 <sup>rd</sup> party sourced FFB received at Jenderata POM	Complied
<p><b>Criterion 4.2:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			

4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -	The manuring operation is guided by a procedure, Field Management Manual (Supplements) (S1.2.2, December 2004). There were 2 method of application i.e. manual broadcast for palms <4 years old and using mechanised spreader for palms >4 years old.	Complied
4.2.2	Records of fertiliser inputs shall be maintained. - Minor compliance -	The application of fertilisers was done based on recommendation made by agronomist. Records of application were adequately maintained by the estates. Based on the recommendation by agronomist the average dosage was around 6 kg/palm/year with combination of straight and mixed fertilisers. Verification of the fertilisers input records such as progress report and store issuance, showed that as at May 2018 the estates have completed around 50% of the programme.	Complied
4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	There is evidence of periodic tissue and soil sampling. Leaf analysis was done on 27/2-29/4/2017 (ref.: lab test no.: A010/17) for 2018. Soil sampling was last done 9-14/3/2018 (ref.: lab test no.: E002/18) by UPID (UP Research Dept.).	Complied
4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -	Supply of EFB was quite limited due to mill usage for boiler fuel. Thus, the application of EFB in the estates was done in a small scale. Application of POME was carried out through land application. Based on the records, Jenderata Estae had applied 113,127 m <sup>3</sup> /71.6 Ha in 2017.	Complied
<b>Criterion 4.3: Practices minimise and control erosion and degradation of soils.</b>			
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	Soil maps were made available for the estates. Example, based on the soil map at Jenderata Estae, the soil type is Bayas Series (deep peat >9'), Bayas Series (deep peat >6'-9'), Nipis Series (moderately deep 3'-6'), Penor Series (shallow peat <3'), Sabrang Series, Sedu Series, Jawa Series, Selangor Series and Briah Series. Soil type at Sri Pelangi is all mineral.	Complied

4.3.2	A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	The management strategy for planting on slopes between 9 and 25 degrees is addressed in the land preparation procedure (planting and replanting). The major method to minimise soil erosion was construction of terrace. Avoidance of bare soil was done through establishment of cover crop.	Complied
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	Road maintenance programmes were available for the visited estates. Among the activities in the programme were resurfacing, patching, grading, compacting and bridge/culvert maintenance. Based on progress report and budget, Jenderata has completed around 38% of its programme for 2018.	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 -	Subsidence of peat was done using peat probe. Based on the records monitored since 2010, it showed that the subsidence was around 1-2cm/year.	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 -	Last drainability report for Jenderata was dated 27/10/2017 (ref.: 1.977/2359/2017). Finding: good drainability where the excess water in the field could be drained off by gravity even during the highest tide (Apical, 2015).	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 -	The management strategy for peat soil is addressed in a procedure. Water table is maintained between 60 to 90 cm through management of bunds and water gates.	Complied
<b>Criterion 4.4:</b> Practices maintain the quality and availability of surface and ground water.			
4.4.1	An implemented water management plan shall be in place. - Minor compliance -	Water management plan is documented under 5 year's continuous improvement plan for Jenderata Estate. Water management at Jenderata is guided by SOP (Manual), 4.0 Water Management, which covers the topic of drains, bunds and water/tide gate. The water management plan was available with objectives: to maintained	Complied

		<p>the water in the field at appropriate level therefore correct amount of water is supplied during dry or wet weather for oil palm survival.</p> <p>Water tables is maintained between 45-60 cm (acid sulphate areas), 60-90 cm (non-acid sulphate) and at a mean of 60 cm below ground surface. The water tables are controlled through water gates and weirs in the field irrigations. To-date there are 15 water gates (1:425 Ha) and 127 weirs (1:50) at Jenderata Estate.</p>	
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 estates have maintained its established riparian reserves mainly by avoidance of agrochemical usage at the designated zones. The water quality was also regularly monitored for e.g. at Jenderata Estate, there were 2 outlets to Sg Bernam i.e. at Field 64 &amp; 65. Among the parameters tested for water quality were pH, BOD, COD, TSS, O&amp;G, DO, AN and E. Coli. Last sampling was done on 10-11/11/2017 and analysis was done by BP Food Environmental Testing (SAMB No. 573).</p>	Complied
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>Jendarata POM is using the biological treatment to treat its effluent through series of ponds such as cooling, aerobic and anaerobic. A biogas plant is also in place as part of the treatment series. Under the DOE's Compliance Schedule (Jadual Pematuhan) [License No.: 004233], Jendarata POM is required to treat its effluent until the BOD level is below 5,000 mg/l before discharging it to land application through furrow system. Based on the latest four quarterly returns to the DOE, BOD readings of final discharge were all below 5,000 mg/l. The samples of final discharge were analysed by an accredited third party laboratory.</p>	Complied
4.4.4	<p>Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored.</p> <p>- Minor compliance -</p>	<p>Mill has maintained monitoring of water usage for processing FFB which recorded every month. Water for processing is abstracted from water catchment by using pump. An average of 1.594 m<sup>3</sup> (to date May 2018) water is used to process per mt of FFB compared to 1.9 m<sup>3</sup>/tonne FFB in 2017.</p>	Complied
<p><b>Criterion 4.5:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.</p>			



4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	Implementation of IPM is guided by Field Management Manual (supplements). The estates has established beneficial plant such as Tunera sp. Carambola, antigonon and Cassia cobanensis. Barn owls were also kept in field e.g. in Jenderata Estate, there were 186 boxes available with 85 boxes occupancy, based on the census records.	Complied
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	The IPM training at Jenderata was last conducted on 7/2/2018, attended by 5 workers. Among the topics covered were planting of beneficial plant, pheromone trap and barn owl maintenance.	Complied
<b>Criterion 4.6:</b> Pesticides are used in ways that do not endanger health or the environment			
4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance -	Justification of all pesticides used was defined in the Chemical Register. Among the information available is type of spraying operations and its type of chemical used e.g.: <ul style="list-style-type: none"> <li>• Circle spray (mature) – e.g. glyphosate + amine + methylsulfuron</li> <li>• Circle spray (immature) – e.g. Basta (a.i.: glufosinate isophrophylamine)</li> <li>• Bagworm &amp; rhino beetles treatment – e.g. cypemethrin (turbomiser)</li> <li>• Rat baiting – e.g. warfarin</li> <li>• Cover crop spray – e.g. fusillade</li> </ul>	Complied
4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -	The estates continued to maintained their records of pesticides consumption and updated on monthly basis. The information about LD50, and a.i. applied per ha was available for verification.	Complied
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 was no prophylactic use of pesticides. The application of pesticides were based on level of attack severity which was normally obtained through census. E.g. the use cypermethrine for bagworm control at field 44 and 75	Complied

	<p>There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines.</p> <p>- Major compliance -</p>	<p>was based on bagworm census. The census records were available for verification.</p> <p>Where estates have been identified to be prone to nettle caterpillar and bagworm outbreaks, the critical threshold level can be reduced to 5 live larvae per frond. In specific situations these action thresholds can be refined to suit particular situations in consultation with UPRD [ref.: Field Management Manual (FMM)].</p>	
4.6.4	<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>Based on chemical register dated 20/4/18, no WHO class IA and IB used. The used of Paraquat is banned since 2010. Only class II, III and IV chemical used in the estate.</p>	Complied
4.6.5	<p>Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7).</p> <p>- Major compliance -</p>	<p>Pesticides were handled, used or applied by trained workers applied in accordance with the product label. Latest training for pesticides handler was conducted on 18/1/18. Appropriate safety and application equipment were provided and used, i.e carbon filter respirator, 3M 3744K, anti-fog goggles, apron and wellington boots. All precautions attached to the products were properly observed, applied, and understood by workers based on the interview with staff and workers at visited estates</p>	Complied
4.6.6	<p>Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3).</p> <p>- Major compliance -</p>	<p>The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation. Separate vault will be used to store class IA and IB chemical.</p>	Complied

4.6.7	<p>Application of pesticides shall be by proven methods that minimise risk and impacts.</p> <p>- Minor compliance -</p>	<p>Method use for pesticides application is based on SOP no.44, Spraying Pest and Disease dated 3/4/17. There is bagworm infestation occurred in some of the immature area at Jenderata Estate. Mechanized spray method is used using Turbo miser with class III chemical, Cypermethrin replacing class I chemical, Monocrotophos.</p> <p>Complete PPE is worn by operator during site visit at field 118 (bagworm spray) and 91 (strip spray).</p> <p><u>Seri Pelangi Estate</u></p> <p>For tall palm, bagworm infestation treated using trunk injection method with organophosphate chemical (monocrotophos). SOP, no.15 dated 10/5/18 for Trunk Injection is referred to.</p> <p>Permit to buy Highly Toxic Pesticide Regulation 1996, no. PRK/2018/MONO/059(GL) for 220 litre for bagworm infestation area, field 19,20 and 21. Permit to buy is valid from 2/3/18-22/3/18.</p> <p>The latest trunk injection was done on 26/6/18 at field no.20. Total of 20 litre of monocrotophos was issued for the application. Form I (medical records), II ( exposure hours) and III (pesticides records) are used for the monitoring as per requirement under Highly Toxic Pesticide Regulation 1996.</p>	Complied
4.6.8	<p>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.</p> <p>- Major compliance -</p>	<p>Pesticide application by aerial spraying is not practiced by the company.</p>	Complied
4.6.9	<p>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).</p>	<p>Training to enhance knowledge and skills of employees are regularly given, e.g.:</p> <ul style="list-style-type: none"> <li>• Safe spraying techniques (conducted on 29/1, 23/3)</li> <li>• Field clinic (23/3)</li> </ul>	Complied

	- Minor compliance -	PPE and correct use (planned on June and Dec)																	
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 -	Empty chemical containers were triple rinsed and punctured before disposing through recycler companies. Interview with workers and person in-charge of the waste showed a good understanding about proper disposal of the wastes.	Complied																
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	<p><u>Jenderata Estate</u> Medical surveillance was last done on 16 October 2017 for workers from chemical mixer and sprayer. The last medical surveillance was carried out on 17/4/18 by OHD DOSH Reg. No. JKPP HQ/12/DOC/00/279 under "Klinik &amp; Surgery Lee". Result of the Medical Examinations found to be normal without any health detrimental issues. Cholinesterase level is within limit of 7000-19000 IU/L.</p> <p><u>Seri Pelangi Estate</u> The latest medical surveillance was carried out on 24/2/18 for a group of trunk injector, sprayer, manure and workshop operator. Based on the medical result (USECHH 3 and 4), no detrimental of health found. Refer to OHD report, HQ/12/DOC/00/279 under Klinik &amp; Surgery Lee.</p> <p>Medical result for trunk injection workers;</p> <table border="1"> <thead> <tr> <th>Worker's ID/passport</th> <th>Date of surveillance</th> <th>Chlorinaseterase (7000-19000)</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>AE5889358</td> <td>12/4/18</td> <td>13977</td> <td>Fit</td> </tr> <tr> <td>AE9703188</td> <td>12/4/18</td> <td>13734</td> <td>Fit</td> </tr> <tr> <td>BK0523422</td> <td>12/4/18</td> <td>10775</td> <td>Fit</td> </tr> </tbody> </table>	Worker's ID/passport	Date of surveillance	Chlorinaseterase (7000-19000)	Status	AE5889358	12/4/18	13977	Fit	AE9703188	12/4/18	13734	Fit	BK0523422	12/4/18	10775	Fit	Complied
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4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	No women sprayer at Jenderata and Seri Pelangi Estate.	Complied																

<b>Criterion 4.7:</b> An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:		
4.7.1	<p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.</p> <p>- Major compliance -</p>	<p>Occupational Safety and Health Policy was observed available. Relevant safety operating procedures covering overall Mill operation signed by Chief Executive Director. The policy was written in English, Malay, Tamil, Hindi, Nepali and Bangaladeshi language. The policy cover effort in accident prevention by conducting HIRARC, training and supervision.</p> <p>The OSH plan has developed and in-lined with company's policy and incorporated with the training plan and OSH compliance monitoring programme. Among OSH plan implemented for 2017-2018:</p> <p>i) LEV testing and monitoring</p> <p>Annual LEV monitoring was carried out on 28/12/17 by registered industrial hygiene technician 2, HQ/11/JHII/00/17. The system installed at laboratory was in compliance with ACGIH and USECHH Regulation 2000 requirements on ducting velocity. Refer to report, JPOM/GPC-KR-DOSH-L0118/065/AA</p> <p>ii) Audiometric Testing</p> <p>The latest audiometric testing was carried out on 13/3/18 for total of 104 workers for Jenderata POM. Report, dated 24/5/18 was verified. Total of 10 workers reported with hearing impairment.</p> <p>Further check with ENT doctor was done on 22/6/18. Standard threshold shift reported and advise to notify DOSH using JKPP 7 form. Sighted 2 cases reported on 20/6/18. As to date, no feedback received from DOSH.</p> <p>iii) Personal Chemical Exposure Monitoring</p> <p>The latest test was last carried out on 20/12/17 for n-Hexane and chormium exposure. Based on the results, Permissible Exposure Limit (PEL) for the above chemical is below the limit as stipulated under USECHH Regulation 2000. HQ/15/JHI/00/197 dated 20/12/17</p>
		Complied

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		<p>N-hexane( 30.7 mg/m<sup>3</sup> vs 176 PEL), Chromium (0.15 vs 0.5 PEL). Report, JPOM/GPC-KR-DOSH-L0118/066/AA</p> <p>v) Medical Surveillance Medical surveillance was last done for workers from laboratory. The last medical surveillance was carried out on 17/5/18 by OHD; HQ/12/DOC/00/279 under "Klinik and Surgery Lee". Result of the Medical Examinations found to be normal without any health detrimental issues.</p> <p>vi) Additional noise monitoring 30/12/17 – new boiler and turbine installation (location of monitoring – biomass reciprocating grate no.2 JKKP HIE 127/5/3-1 Noise zoning – new boiler 95 dBA, new turbine 100 dBA.</p>	
<p>4.7.2</p>	<p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.</p> <p>- Major compliance -</p>	<p>Risk of all operation documented under HIRARC register. Risk identified according to each station/activities at POM such as sterilizer bay, press station (screw press operation, digester and etc), oil clarification, workshop, laboratory and etc. Other auxiliary operation like biogas plant has been identified as well. Latest review of HIRARC was done 13/7/17 for the latest accident involved at loco/ramp area. In addition to specific training courses, safety briefings are given during muster to reinforce awareness such as correct wearing of PPE.</p> <p>On top of the HIRARC, CHRA was last revisited on 28th November 2013 by registered DOSH assessor, JKKP HIE 127/171-2(250). 5 work units were assessed; lab quality control, store, production and factory.</p> <p>Recommendation by assessor:</p> <ul style="list-style-type: none"> <li>i) LEV inspection and monitoring of fume hood</li> <li>ii) Chemical Exposure monitoring for N-hexane and chromium.</li> <li>iii) Health surveillance for N-hexane</li> </ul> <p><u>Jenderata Estate</u></p>	<p>Major Non-Compliance</p>

		<p>Chemical Health Risk Assessment (CHRA) was last revisited on 29/1/15 by registered assessor, JKPP IH 127/171-2(1) under RHM Consultant. 9 work units were assessed; chemical mixer, P&amp;D, fertilizer application, Cover Crop Purification, Circle Spray, CDA spray, Selective Spray, Water Treatment and Tractor Pool.</p> <p>Recommendation by assessor:</p> <ul style="list-style-type: none"> <li>i) Chemical register, CSDS, labelling of container</li> <li>ii) Chemical safe handling training</li> </ul> <p>HIRARC for field activities were sampled as per the following:</p> <ul style="list-style-type: none"> <li>i) Turbomiser Spray, last reviewed on 21 April 2017 (main hazard identified: physical injury and fatality. Chemical hazard and illness/occupational poisoning was not identified.</li> <li>ii) Circle spray, last reviewed on 3 April 2017 (main hazard identified: physical injury and chemical exposure)</li> <li>iii) Fertilizer application (mechanical) – last reviewed 3/4/17. (main hazard identified: physical body injury and fatality). Ergonomic hazard and dust/chemical exposure was not identified.</li> <li>iv) Harvesting – last reviewed 3/4/17 (main hazard identified: body injury, fracture). Ergonomic hazard was not identified. and existing control measure is not sufficient (PPE requirement was not included in the SOP, only working tool/sickle cover @ scabbard described as for minimum PPE guideline) - hard hat, covered shoe is not part of the PPE requirement</li> </ul> <p>Activity – walking from palm to palm, hazard (hazard – hit by falling dried frond) existing control (training and briefing) – the last hierarchy of control on PPE was not identified.</p>	
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		<p>iv) Railtrack maintenance – last reviewed on 3/4/17. Main hazard identified – body injury, fatality etc. Hazard not identified – heat stress, working under hot sun/immature area.</p> <p>Seri Pelangi Estate HIRARC sampled:</p> <p>i) Trunk injection – last review 10/5/18. Main hazard identified: physical hazard, body injury, chemical poisoning/toxicity.</p> <p>ii) P&amp;D foliar spray – last review 10/5/18. Heat stress has not been identified.</p> <p>Thus, a major NC was issued.</p> <p>Chemical Health Risk Assessment (CHRA) was last revisited on 19/7/17 by registered assessor, JKPP IH 127/171-2(1) under RHM Consultant. 4 work units were assessed; weeds, pest and disease, fertilizer, fuel station and general workers.</p> <p>Recommendation by assessor:</p> <p>i) Chemical register, CSDS, labelling of container</p> <p>ii) Chemical safe handling</p> <p>iii) Medical surveillance for trunk injection operator</p> <p>Revised HIRARC under section loading ramp. Date of accident: 10/7/17, revised date: 13/7/17</p> <p>Type of control is more toward administrative control on re-training of SOP and revised HIRARC for loading ramp/loco operator dated 15/7/17.</p>	
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<p>4.7.3</p>	<p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.</p> <p>- Major compliance -</p>	<p>Training Programme for the year 2017 and 2018 was established. Awareness and training programme had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE. Sample of training carried out in 2017 and 2018:</p> <table border="1" data-bbox="1048 612 1921 1094"> <thead> <tr> <th>Training</th> <th>Date of Training</th> <th>Trainer</th> </tr> </thead> <tbody> <tr> <td>LOTO training</td> <td>17/1/18</td> <td>Engineering Department</td> </tr> <tr> <td>MSDS Training</td> <td>27/2/18</td> <td>Engineering Department</td> </tr> <tr> <td>PPE Usage Training</td> <td>28/5/18</td> <td>Engineering Department</td> </tr> <tr> <td>SOP Biogas</td> <td>15/3/18</td> <td>Engineering Department</td> </tr> <tr> <td>HIRARC Training</td> <td>23/6/18</td> <td>Engineering Department</td> </tr> <tr> <td>Fire Drill Training</td> <td>9/6/18</td> <td>Engineering Department</td> </tr> <tr> <td>Boiler Operation Training</td> <td>5/11/17</td> <td>Engineering Department</td> </tr> <tr> <td>Ramp operation: SOP and HIRARC</td> <td>20/9/17</td> <td>Engineering Department</td> </tr> </tbody> </table> <p>Records were available of PPE issued to individual workers and contractors, including signatures to confirm receipt. PPE standard is based on CHRA assessor's recommendation as per the following:</p> <table border="1" data-bbox="1048 1248 1921 1294"> <thead> <tr> <th>Activity/work unit</th> <th>PPE recommendation</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Training	Date of Training	Trainer	LOTO training	17/1/18	Engineering Department	MSDS Training	27/2/18	Engineering Department	PPE Usage Training	28/5/18	Engineering Department	SOP Biogas	15/3/18	Engineering Department	HIRARC Training	23/6/18	Engineering Department	Fire Drill Training	9/6/18	Engineering Department	Boiler Operation Training	5/11/17	Engineering Department	Ramp operation: SOP and HIRARC	20/9/17	Engineering Department	Activity/work unit	PPE recommendation			<p>Major Non-Compliance</p>
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		<p>Spraying</p>	<p>Half face respirator (3M 3311K-55) 3M 6003/3M 6200 (chemical mixer) Rubber nitrile gloves Chemical goggles Body apron</p>		
		<p>Manuring/fertilizer</p>	<p>Dust mask 3M 9010 N95 Rubber/cotton gloves</p>		
		<p>Workshop</p>	<p>Ventilation fan/ Natural ventilation Dust mask 3M 9010 N95 Safety boots Welding gloves</p>		
		<p>Laboratory</p>	<p>Double cartridge organic vapor respirator 3M 6003/3M 6200 Rubber glove Apron Goggle</p>		
		<p>It was found that workers in mill are not wearing appropriate PPE. There is procedures that on daily basis, the workers are checked on their PPE prior start work. The assist engineer will fill up the Personal Health Declaration Daily Records to show that workers are being monitored that the appropriate and safe PPE are used. However, it was found that Yeasin a worker at the Palm Oil Mill was wearing a substandard safety helmet.</p>			
<p>4.7.4</p>	<p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible</p>	<p>At POM, there is a designated OSH Coordinator who is responsible for organising safety training, meetings and investigation and reporting of</p>			<p>Major Non-compliance</p>

	<p>person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.</p> <p>- Major compliance -</p>	<p>accidents and Incidents. The latest OSH meeting was carried out on 4/4/18.</p> <p>Workplace inspection report did not incorporated in the meeting minute. SHC committee 28/12/17 SHC committee 4/4/18 No report s of WI as to date.</p> <p>Based on the latest meeting minute dated 4/4/18, some of the unsafe act/dangerous occurrence observed during site visit at POM was not captured in the minute pertaining to;</p> <ul style="list-style-type: none"> <li>i) No hot drain cover for turbine cooling water discharge near clarification station.</li> <li>ii) LPG store – oxygen and acetylene cylinder was not securely chained.</li> <li>iii) Shovel – safety device malfunction (revolving light, sensor and horn)</li> </ul> <p><u>Jenderata Estate</u> Chairman – Group manager Secretary – EHA 21/3/ 18 – 1st meeting in 2018 Workplace inspection record (div 2 Master ground)</p> <p>20/6/18 – 2nd meeting for 2018 Workplace inspection records – field 60 Issues raised by committee/HA - Hit from falling object (fronds and FFB )</p> <p><u>Seri Pelangi Estate</u></p>	
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		<p>SHC meeting, 29/3/18, workplace inspection was done at field 23/3/18.</p> <p><u>Jenderata POM</u></p> <p>Workplace inspection report did not incorporated in the safety health committee meeting minute dated 28/12/17 and 4/4/18. No reports of workplace inspection as to date.</p> <p>Thus, a major NC was raised.</p> <p>Workplace inspection and line site inspection will be carried out prior to SHC meeting. PPE compliance monitoring was monitored on daily basis as well as to check health status of workers. Refer to report dated 25/6/18. Records were available confirming that quarterly OSH meetings had been held at the estate. Accident reported to DOSH using JKKP 6 from. Refer to report dated 16/5/17. Date of report 20/5/17 - chain handler caught in between (14 days MC).</p>	
4.7.5	<p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Accident and emergency procedures had been written and briefed to staff, workers, contractors and visitors. Emergency Response Team incorporated under OSH organization chart for 2018. ERT Training schedule 2018 sighted.</p> <p>Workers trained in firefighting, rescue method and prepared for the any unforeseen circumstances. Latest fire drill was carried out on 9/6/18 at Jenderata POM.</p>	Complied

<p>4.7.6</p>	<p>All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -</p>	<p>All workers are provided with medical care, and covered by accident insurance. At Jenderata POM, Insurance policy, MW234393 under RHB Insurance Berhad, valid until 8/5/19 verified for foreign workers. A for the local workers, all are covered under SOCSO, refer to "<i>Jadual caruman 8A, for 70 workers</i>" for May 2018.</p> <p>Jenderata Estate</p> <table border="1" data-bbox="1048 628 1919 1211"> <thead> <tr> <th>Workers ID</th> <th>Policy Number</th> <th>Validity period</th> </tr> </thead> <tbody> <tr> <td>BL0118376</td> <td>MW182075, under RHB Insurance Berhad</td> <td>11/9/17-10/9/18</td> </tr> <tr> <td>BN0892737</td> <td>MW203603 under RHB Insurance Berhad</td> <td>26/1/18-25/1/19</td> </tr> <tr> <td>M0576123</td> <td>MW174839 under RHB Insurance Berhad</td> <td>14/7/17-13/7/18</td> </tr> <tr> <td>BL0331267</td> <td>FW214072 under RHB Insurance Berhad</td> <td>15/12/17-14/12/18</td> </tr> <tr> <td>N9867323</td> <td>FW213666 under RHB Insurance Berhad</td> <td>24/11/17-23/11/18</td> </tr> <tr> <td>N9333177</td> <td>MW243763 under RHB Insurance Berhad</td> <td>29/6/18-28/6/19</td> </tr> </tbody> </table> <p>Seri Pelangi Estate</p> <table border="1" data-bbox="1048 1302 1919 1343"> <thead> <tr> <th>Workers ID</th> <th>Policy Number</th> <th>Validity period</th> </tr> </thead> <tbody> </tbody> </table>	Workers ID	Policy Number	Validity period	BL0118376	MW182075, under RHB Insurance Berhad	11/9/17-10/9/18	BN0892737	MW203603 under RHB Insurance Berhad	26/1/18-25/1/19	M0576123	MW174839 under RHB Insurance Berhad	14/7/17-13/7/18	BL0331267	FW214072 under RHB Insurance Berhad	15/12/17-14/12/18	N9867323	FW213666 under RHB Insurance Berhad	24/11/17-23/11/18	N9333177	MW243763 under RHB Insurance Berhad	29/6/18-28/6/19	Workers ID	Policy Number	Validity period	<p>Complied</p>
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4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	Occupational injuries recorded using Lost Time Accident (LTA) metrics. For Jenderata POM and Estate, in 2017: 7 cases (98 days) recorded while in 2018: 3 cases with 69 days reported. The figure is extracted from monthly safety performance report for Jenderata Business Unit.  <u>Seri Pelangi Estate</u> 2017 : 1 case ( 95 days) and zero case recorded in 2018.	Complied						
<b>Criterion 4.8:</b> All staff, workers, smallholders and contract workers are appropriately trained.									
4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. - Major compliance -	Training Programme for the year 2017 and 2018 was established. Awareness and training programme had been carried out. All workers involved had been adequately trained in safe working practices. Samples of training: 1. The IPM training at Jenderata was last conducted on 7/2/2018, attended by 5 workers. Among the topics covered were planting of beneficial plant, pheromone trap and barn owl maintenance. 2. Pesticides handler was conducted on 18/1/18 3. Training to enhance knowledge and skills of employees are regularly given, e.g.: Safe spraying techniques (conducted on 29/1, 23/3);	Complied						

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4.8.2	Records of training for each employee shall be maintained. - Minor compliance -	<p>Records of training for 2017 and 2018 as summarized below:</p> <table border="1" data-bbox="1048 491 1921 1155"> <thead> <tr> <th>Training</th> <th>Date of Training</th> <th>Trainer</th> </tr> </thead> <tbody> <tr> <td>LOTO training</td> <td>17/1/18</td> <td>Engineering Department</td> </tr> <tr> <td>MSDS Training</td> <td>27/2/18</td> <td>Engineering Department</td> </tr> <tr> <td>PPE Usage Training</td> <td>28/5/18</td> <td>Engineering Department</td> </tr> <tr> <td>SOP Biogas</td> <td>15/3/18</td> <td>Engineering Department</td> </tr> <tr> <td>HIRARC Training</td> <td>23/6/18</td> <td>Engineering Department</td> </tr> <tr> <td>Fire Drill Training</td> <td>9/6/18</td> <td>Engineering Department</td> </tr> <tr> <td>Boiler Operation Training</td> <td>5/11/17</td> <td>Engineering Department</td> </tr> <tr> <td>Ramp operation: SOP and HIRARC</td> <td>20/9/17</td> <td>Engineering Department</td> </tr> <tr> <td>Spraying Training</td> <td>18/1/18</td> <td>Estate Assistant</td> </tr> <tr> <td>Harvesting Training</td> <td>7/4/18</td> <td>Estate Assistant</td> </tr> <tr> <td>Safe Tractor Driver Training</td> <td>30/1/18</td> <td>Estate Assistant</td> </tr> </tbody> </table> <ul style="list-style-type: none"> <li>SW competent person-Mr. Goh Kheng Wee-CePSWaM/16804-validity 15/11/2016-15/11/2017-Field Training Report (FTR) submitted to 7/11/2017 and pending for result 9ref.: e-mail Noor Huda Mohd Yusof (<a href="mailto:huda@doe.gov.my">huda@doe.gov.my</a>) dated 14/11/2017</li> </ul>	Training	Date of Training	Trainer	LOTO training	17/1/18	Engineering Department	MSDS Training	27/2/18	Engineering Department	PPE Usage Training	28/5/18	Engineering Department	SOP Biogas	15/3/18	Engineering Department	HIRARC Training	23/6/18	Engineering Department	Fire Drill Training	9/6/18	Engineering Department	Boiler Operation Training	5/11/17	Engineering Department	Ramp operation: SOP and HIRARC	20/9/17	Engineering Department	Spraying Training	18/1/18	Estate Assistant	Harvesting Training	7/4/18	Estate Assistant	Safe Tractor Driver Training	30/1/18	Estate Assistant	Complied
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<b>Principle 5: Environmental responsibility and conservation of natural resources and biodiversity</b>			
<b>Criterion 5.1:</b> Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.			
5.1.1	<p>An environmental impact assessment (EIA) shall be documented.</p> <p>- Major compliance -</p>	<p>Environmental Risk Assessment (ERA) was last reviewed on 7/5/2018 for both estate and mill. There were 3 main criteria considered in the assessment i.e. severity, quantity/load, probability. From the assessment, the information about the level of environmental risks were then obtained and it was important to determine the Environmental Action Plan (EAP) later. Verification of the assessment report showed that all activities in the mill and estate that could interact with the environment were assessed.</p>	Complied
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>The mitigations measures were derived from ERA evaluation. Among the sampled activities to verify the methods of mitigation were:</p> <p><u>Weeding:</u></p> <p>Method to reduce the level of impact:</p> <ul style="list-style-type: none"> <li>Reduce usage of chemicals by using mechanical mowers</li> <li>Judicious spraying program to avoid over-spray</li> <li>Used chemical containers are triple rinsed and punctured</li> <li>LCC establishment</li> <li>Avoid spraying along the edges of water course</li> <li>Use of chemicals with low residual volume</li> <li>Spent lubricants, oil filters and batteries are sent to waste managers</li> <li>Final discharge from chemical mixing store to go through filter i.e. charcoal/EFB</li> </ul>	Complied



		<p><u>Biogas plant:</u></p> <ul style="list-style-type: none"> <li>• Regular checking on critical parts such as pipe joint and pumps</li> <li>• Prompt action on leaking parts</li> <li>• Contained the effluent within plant area</li> </ul> <p><u>ETP:</u></p> <ul style="list-style-type: none"> <li>• Regular desludging of effluent ponds and disposal to land application furrows</li> <li>• Operation of Biogas plant</li> </ul> <p><u>Replanting</u></p> <p>Environmental Impacts:</p> <ul style="list-style-type: none"> <li>• Compliance to EQA</li> <li>• Soil erosion and siltation of waterways</li> <li>• Shift in biodiversity &amp; lack of adequate buffers/DID regulation compliances</li> <li>• Reduction in CO2 sequestration</li> <li>• Uncollected polybags</li> <li>• Excavator used lubricants, oil filters and batteries</li> </ul> <p>Method to reduce the level of impact</p> <ul style="list-style-type: none"> <li>• Strict adherence to zero burn policy</li> <li>• Quick establishment of LCC</li> <li>• Control adjoining waterways along the replant</li> <li>• Re-establish buffer zone as per DID Reg. Two years before replanting, only do circle weeding and let woodies growth. At the time of replant, no felling of old palms in the buffer zone</li> <li>• Collect all polybags, used lubricants, oil filters, batteries and send to wastes managers</li> </ul>	
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5.1.3	<p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p> <p>- Minor compliance -</p>	<p>Updating of the progress of plan was carried out by the person in-charge and the results of the monitoring effectiveness were reviewed by the management.</p>	Complied
<p><b>Criterion 5.2:</b> The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.</p>			
5.2.1	<p>Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).</p> <p>- Major compliance -</p>	<p>The HCV assessment for the complex was conducted by Wild Asia. Report dated January 2008 was available for verification. The structure of the report generally has the description about methodology used, coverage and the findings on presence of HCV and RTE species.</p>	Complied
5.2.2	<p>Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan.</p> <p>- Major compliance -</p>	<p>Based on the report, there was no HCV or RTE presence in the plantation. Nonetheless, Jenderata has its own self-declared high conservation area i.e. the cemetery area. Based on the evaluation of the self-declared HCV, the assessment team was of the view that Jenderata may need to relook into the classification of HCV.</p>	Complied
5.2.3	<p>There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species.</p> <p>- Minor compliance -</p>	<p>Jenderata has conducted its education program on HCV through:</p> <ul style="list-style-type: none"> <li>• Ongoing briefing in the muster ground for workers with objective to create awareness on sustainability policies such as OSHA Policy, Environment &amp; Biodiversity policy, CSR Policy and Human rights policy</li> <li>• Putting up signage of restriction of hunting, collecting and fishing at strategic places in the estates</li> </ul>	Complied

5.2.4	<p>Where a management plan has been created there shall be ongoing monitoring:</p> <ul style="list-style-type: none"> <li>• The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported;</li> <li>• Outcomes of monitoring shall be fed back into the management plan.</li> </ul> <p>- Minor compliance -</p>	<p>Although there was no RTE species or HCV reported to be present in the complex, the management still made efforts to monitor the conservation areas on sighting of animals presence and trace of human intrusion. The monitoring report was well maintained.</p>	Complied
5.2.5	<p>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.</p> <p>- Minor compliance -</p>	<p>No HCV with existing rights of local communities was identified that needs to be set aside.</p>	Complied
<b>Criterion 5.3:</b> Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.			
5.3.1	<p>All waste products and sources of pollution shall be identified and documented.</p> <p>- Major compliance -</p>	<p>The wastes products were documented in "Types of Waste Products and Method of Disposal". The document has the information about type of waste, source of waste, quantity generated/month and method of disposal. Among the wastes sampled for verification:</p> <ul style="list-style-type: none"> <li>• POM Effluent from milling process, disposal method – land application</li> <li>• EFB from milling process, disposal method – shredded and use for bio-fuel for boiler</li> <li>• Boiler ash from milling process, disposal method – for road patching, replacement for MOP</li> <li>• Scheduled wastes (used oil, spent batteries, contaminated filters, clinical wastes, etc.) from maintenance/clinic, disposal method – sent to licensed collector</li> <li>• Domestic wastes from household, disposal method – landfill</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>Empty chemical containers from field upkeep, disposal method – sold to certified wastes buyer/recycler</li> </ul> <p>Scrap metal from operations, disposal method – sent to recyclers</p>	
5.3.2	<p>All chemicals and their containers shall be disposed of responsibly.</p> <p>- Major compliance -</p>	<p>The management of the empty chemical containers is guided by a procedure entitled "Standard Operating Procedure (C) Triple Rinsing Empty Pesticide Containers", dated 26/5/2016. Based on the procedure, the empty containers must be triple rinsed, punctured and sold to recycler. E.g. on 13/6/18-DO#1497-560 kg of ECC to Pragash Rao Enterprise</p> <p>At the mill, empty chemical containers (mainly used for boiler's water treatment) were return to supplier i.e. Enviro Green and AC&amp;T. Delivery Notes verified to AC&amp;T - Jendarata Engineering Dept.'s DN#120359-12/2/2018 and DN#120376-13/3/2018.</p> <p>During is field assessment at Jendarata Estate Division 2 Line site 1) At house B7, the was found that PETRONAS Lubricant Drum was recycled as water storage and lubricant container recycle for washing; 2) At house B8, the was found that paint container was recycle.</p>	Major Non-Compliance
5.3.3	<p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.</p> <p>- Minor compliance -</p>	<p>On-site verification showed that all the disposal of wastes was well managed. Among the records/practice (DOE's 6<sup>th</sup> Schedule) verified:</p> <p><u>Jendarata POM:</u></p> <ul style="list-style-type: none"> <li>SW109 (wastes of broken fluorescent tube &amp; bulbs)-12/1/2018-0.0464 mt to Kenep Waste Management Sdn Bhd</li> <li>SW410 (rags)-12/1/2018-0.1900 mt to Kenep Waste Management Sdn Bhd</li> <li>SW417 (waste of paint)-28/3/2018-0.4400 mt to Riyaland Sdn Bhd</li> <li>SW305-27/1/2018 to Pentas Flora Sdn Bhd</li> <li>SW410 (rags &amp; filter)-6/6/2018, 0.2mt to Edsha Solutions Sdn Bhd</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>SW305-6/6/2018-1.00 mt to Primochem Sdn Bhd</li> </ul> <p><u>Jenderata Estate:</u> SW 404 – last disposed to Kualiti Alam Sdn Bhd through Clinco Sdn (transporter)[ref.: appointment letter from KA to Clinco to be their transporter under KA license, dated 27/3/2015 [ref.: KASB/CEO/CLINCO/PK/let-244/0315] was on 6/6/2018 – BLM2883, driver Faizal</p> <p><u>Seri Pelangi Estate</u></p> <ul style="list-style-type: none"> <li>SW410-6/6/2018-0.0390 mt to Edsha Solution Sdn Bhd</li> <li>SW305-6/6/2018-0.5 mt to Promichem Sdn Bhd</li> <li>SW404-31/5/2018-0.0011 mt to Kualiti Alam Sdn Bhd</li> </ul>	
<b>Criterion 5.4:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised.			
5.4.1	<p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored.</p> <p>- Minor compliance -</p>	<p>The CU continued to monitor its diesel consumption and records were documented. The biogas plant which generates electricity to supply to the national grid has helped the CU to improve the efficiency of fossil fuel consumption. Apart from that, regular maintenance of machinery and continuous education to machines operators have also contributed the efficient consumption of fossil fuel.</p>	Complied
<b>Criterion 5.5:</b> 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	<p>There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.</p> <p>- Major compliance -</p>	<p>No fire was used for preparation of land. Verification on the latest replanting fields confirmed that no trace of open burning observed.</p>	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 -	Not applicable as no fire was used for land preparation.	Not applicable
<b>Criterion 5.6:</b> Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			
5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -	Assessment of all polluting activities was conducted under Environmental Risk Assessment for identifying activities that contributes significant impact to environment including gaseous emission. As prescribed under DOE's Compliance Schedule, the mill is obliged to conduct stack sampling twice a year. Below are the verified reports: Stack sampling conducted by Envosha Sdn Bhd: <ul style="list-style-type: none"> <li>• 23/3/2018 – chimney 5=0.2641 g/Nm<sup>3</sup>, (report no.: RT033/2018/031)</li> <li>• 25/8/2017 – chimney 5=0.2691 g/Nm<sup>3</sup>, (report no.: RT001/2017/209)</li> </ul> In the same sampling, gas such as NOx (using gas analyser) and dark smoke (using BS 2742C) were also tested. Chimney 7 is expected to be conducted in couple of weeks since its still in fine tuning.	Complied
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	The emissions of GHG had been identified through the ERA. Among the identified sources of emission were mill effluent, fossil fuel consumption, peat oxidation and fertilisers consumption to name a few. Various initiatives were implemented to minimise the emission such as bio-gas plant (commissioned since 2006), improvement in fossil fuel consumption and maintaining the water table at peat areas. Apart from that, a Life Cycle Assessment (LCA) of Palm Oil at UP Bhd had also been conducted in 2018. It was carried out by Jannick Schmidt (LCA consultant, Denmark). Objectives of LCA:	Complied

		<ul style="list-style-type: none"> <li>- To document and assess the environmental impacts from the production of palm oil at UPB</li> <li>- To follow overtime the GHG emissions from the production of palm oil at UPB</li> <li>- To compare UP's production of palm oil with average Malaysian/Indonesian palm oil and other major vegetable oils</li> <li>- To analyse options for UP's production of palm oil</li> </ul>	
5.6.3	<p>A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools.</p> <p>- Minor compliance -</p>	<p>Monitoring of GHG emissions was done through RSPO GHG calculator. The last calculation was submitted to RSPO on 14/6/2018. Verification on the raw data records confirmed that the information reported in the RSPO GHG calculator was authentic.</p>	Complied
<p><b>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.</b></p>			
<p><b>Criterion 6.1:</b> Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p>			
6.1.1	<p>A social impact assessment (SIA) including records of meetings shall be documented.</p> <p>- Major compliance -</p>	<p>The Social Risk Assessment is updated on the yearly basis. The Social Risk Assessment SRA is conducted on business unit level whereby the identification on the impacts are input by local stakeholders. The last meeting conducted at the mill was on 16/03/2018 to received input from the local stakeholders.</p> <p>According to the requirements, an SIA is required to be conducted to include factor such as access to rights, economic livelihoods, Subsistence activities, cultural &amp; religious values, health and education facilities, other community values resulting from changes such as improved transport /communication or arrival of substantial migrant labour force. The Social Risk Assessment conducted in the both mill &amp; estates only includes subsistence activities and employment conditions of the foreign workers. Hence Major Non-compliance was raised</p>	Major Non-Compliance

6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	The annual stakeholder meeting has been conducted to updates the SRA. The last stakeholder meeting sample sighted for Seri Pelangi estate is 21/04/2018. However due to finding raised under 6.1.1, OFI on this indicator has been raised to prevent raising multiple finding.	OFI
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 -	The actions plans for year 2018 had included the mitigation of negative impacts but excluded the promotions on positive impacts. However due to finding raised under 6.1.1, OFI on this indicator has been raised to prevent raising multiple finding.	OFI
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 -	Social Action Plan for respective mill and estates are established based on the SRA. The plan are reviewed on annually basis. Sample sighted at the mill and Seri Pelangi Estate for year 2018 has been completed. However due to finding raised under 6.1.1, OFI on this indicator has been raised to prevent raising multiple finding.	OFI
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	There is no smallholders included in this certification.	Not applicable
<b>Criterion 6.2:</b> There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.			
6.2.1	Consultation and communication procedures shall be documented. - Major compliance -	The Grievance Redressal Procedure is established to address any form of communication and consultation for both the external and internal stakeholders.	Complied



6.2.2	<p>A management official responsible for these issues shall be nominated.</p> <p>- Minor compliance -</p>	<p>SOP for responding constructively to stakeholder requests for information, including a specific timeframe to respond to enquiries has established and documented.</p> <p>Stakeholder booklet has defined the process of handling request / response / complaints / grievance. Specific timeframe to respond is within 7 days.</p> <p>The personnel appointed to be responsible for manage stakeholder communication – Ir R Rajasegaran for Jendarata POM and Mr Mohan Das for Jenderata Estate.</p> <p>Records of communication with stakeholders mainly are related to request for support. The records are kept at respective business units.</p>	Complied
6.2.3	<p>A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained.</p> <p>- Minor compliance -</p>	<p>The stakeholder list sighted for this assessment are the Jendarata POM stakeholder list 2018 and Seri Pelangi Estate 2018 which includes Guest workers, NGOs, Government agencies, Schools and internal local community.</p> <p>The Stakeholder Handbook and the employee handbook distributed contains the method and procedure for information request. Interview with the stakeholders confirmed that they received the handbook.</p>	Complied
<p><b>Criterion 6.3:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.</p>			
6.3.1	<p>The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested.</p> <p>- Major compliance -</p>	<p>Jendarata Business Unit have maintained "Grievance Redressal Procedure for External Stakeholder" and "Grievance Redressal Procedure Internal Stakeholder" to address any grievances or communication with the affected stakeholders.</p> <p>UP has also established the Whistleblower Policy dated 02/05/2017 undersigned by Chief Executive Director.</p> <p>The procedure and policy has been printed in Stakeholder Hanbook and Worker Handbook. The handbooks are distributed to all the stakeholders.</p>	Complied

		<p>The procedure and policy is also available in the UP webpage  <a href="http://unitedplantations.com/sustainability/pdf/Whistleblower%20Policy.pdf">http://unitedplantations.com/sustainability/pdf/Whistleblower%20Policy.pdf</a>  <a href="http://unitedplantations.com/sustainability/community_grievance_redressal.asp">http://unitedplantations.com/sustainability/community_grievance_redressal.asp</a></p> <p>Interviewed with the relevant stakeholders confirmed that the booklet was distributed to them. The stakeholders were able to inform the auditor regarding the content of the booklet.</p>	
6.3.2	<p>Documentation of both the process by which a dispute was resolved and the outcome shall be available.            - Major compliance –</p>	<p>The grievances raised are mainly for housing repairs. Any grievances raised internally are recorded in log books. The resolution of the housing repairs had met the required 23 days timeline.</p>	Complied
<p><b>Criterion 6.4:</b> Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
6.4.1	<p>A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place.            - Major compliance -</p>	<p>There is no customary land for the certification unit. Lands for this certification are with proper land titles and the legal ownership belongs to United Plantations Berhad. All the land titles are with term of Commercial crops or with no specific terms. The quite rent has been verified to confirmed UP has the user rights to the lands.</p> <p>There was no land dispute case been reported in Jendarata Estate since the last assessment. All the lands were legally own by United Plantations Berhad. Interviewed conducted with the stakeholders confirmed that no encroachment of land by United Plantations Berhad. The management has maintained trenches to demarcate the ownership of the lands as well as legal boundary stones were maintained.</p> <p>UP has also continued to allowed local communities to access to religious facilities within the plantations</p> <p>However, United Plantations Berhad has established SOP for Land Dispute Settlement as per Free Prior &amp; Informed Consent (FPIC). The procedure</p>	Complied

		was distributed into 3 stages where phase 1 is the process of verification and completing documents of community, phase 2 is the verification process of land legality and last phase is the negotiation process with land owner.	
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 -	There is compensation required for this certification due to no lost of land or user rights.	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 -	There is compensation required for this certification due to no lost of land or user rights.	Complied
<b>Criterion 6.5:</b> Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.			
6.5.1	Documentation of pay and conditions shall be available. - Major compliance -	The samples workers had able to achieve the minimum salary. The minimum salary was achieved base on the normal work hours. During the interview with workers, it was made know to the assessment team that the target set by the company are realistic and able to be completed. For harvester (one type of the piece rated work), as per the MAPA/NUPW agreement, piece rate workers are not subjected to minimum wage. Samples of workers:	Complied

		<ol style="list-style-type: none"> <li>1. Aripin – Jendarata Estate worker</li> <li>2. Sree Akhil Chandra – Jendarata Estate worker</li> <li>3. Uttam – Seri Pelangi Estate worker</li> <li>4. Abdul Kulam – Seri Pelangi Estate worker</li> <li>5. Krishna Bahadur Khatri – Jendarata mill worker</li> <li>6. Mohibur Rahman – Jendarata mill worker</li> </ol>	
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>During the review of the local workers’ contract agreement, it was noted that the contract agreement is a agreement form method. The following was found during this assessment:</p> <ol style="list-style-type: none"> <li>1) Worker Hashwin A/L Sukumaran at mill was converted to permanent worker from temporary worker. Hashwin started work on 30/01/2017. However after his conversion, the employment contract is not available.</li> <li>2) Worker Mariyae at Jendarata Estate has been contracted using the previous Labor Register system which only reference to NUPM/MAPA agreement. However, the register does not explicitly state the recent conditions example, holiday entitlement, reasons for dismissal and period of notice</li> </ol> <p>Hence a Major non-compliance was raised.</p>	Major non-compliance
6.5.3	<p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.</p> <p>- Minor compliance –</p>	<p>Both foreign workers and local workers are provided with housing facilities. Water are provided for no cost to the workers. Workers are also able to access to free medication. Other public facilities including community hall, religious place are provided by UP.</p>	Complied
6.5.4	<p>Growers and millers shall make demonstrable efforts to monitor and improve workers’ access to adequate, sufficient and affordable food.</p> <p>- Minor compliance –</p>	<p>Jendarata is located near to Hutan Melintang town. Workers can access easily to the town. Additionally there are shops available within the Jenderata Estate to enable workers to buy grocery. During the assessment, the team had verified that the price of the good are appropriate. The</p>	Complied

		contract agreement between UP and the grocery shop owner includes that the pricing shall be fair.	
<p><b>Criterion 6.6:</b> The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.6.1	<p>A published statement in local languages recognising freedom of association shall be available.</p> <p>- Major compliance -</p>	<p>The commitment of UP Bhd toward freedom of association is stated in the Human Rights Policy undersigned by UP Bhd Chief Executive Director on 18/08/2017.</p> <p>Interview conducted with workers that joined the Union confirmed they understood the term of the collective agreement. A copy of the agreement is available at the mill and estate for the reference of the workers.</p> <p>The Human Rights policy has been disseminated to the workers through the workers' handbook while to the external parties through Stakeholder Handbook and published at the UP webpage <a href="http://unitedplantations.com/sustainability/pdf/Human%20Rights%20Policy.pdf">http://unitedplantations.com/sustainability/pdf/Human%20Rights%20Policy.pdf</a></p> <p>The list of workers that joined the Union is available in both Jendarata Mill and Jendarata Estate.</p> <p>In the POM, there is a total of 74 workers joining Union including of 13 foreign workers. Appropriate deduction was made correctly.</p> <p>Interviewed with the workers found no evidence that UP is restriction their workers to join/form any union.</p>	Complied
6.6.2	<p>Minutes of meetings with main trade unions or workers representatives shall be documented.</p> <p>- Minor compliance -</p>	<p>Once every 2 months, meeting with the workers representative will be conducted. The last meeting conducted at the mill was on 21/05/2018. The concerns raised by the workers are mainly on housing maintenance.</p>	Complied

<b>Criterion 6.7:</b> Children are not employed or exploited.			
6.7.1	<p>There shall be documentary evidence that minimum age requirements are met.</p> <p>- Major compliance -</p>	<p>The commitment of UP Bhd toward no children labour is stated in the Human Rights Policy undersigned by UP Bhd Chief Executive Director on 18/08/2017.</p> <p>The Human Rights policy has been disseminated to the workers through the workers' handbook while to the external parties through Stakeholder Handbook and published at the UP webpage <a href="http://unitedplantations.com/sustainability/pdf/Human%20Rights%20Policy.pdf">http://unitedplantations.com/sustainability/pdf/Human%20Rights%20Policy.pdf</a></p> <p>The Master worker list of Contractor's workers and UP checkroll workers confirmed all employees are above 18 years old. Interviewed with the workers on field confirmed that no workers below 18 years old were observed working in United Plantations Berhad</p>	Complied
<b>Criterion 6.8:</b> 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	<p>A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented.</p> <p>- Major compliance -</p>	<p>The commitment of UP Bhd toward equal opportunity is stated in the Human Rights Policy undersigned by UP Bhd Chief Executive Director on 18/08/2017.</p> <p>The Human Rights policy has been disseminated to the workers through the workers' handbook while to the external parties through Stakeholder Handbook and published at the UP webpage <a href="http://unitedplantations.com/sustainability/pdf/Human%20Rights%20Policy.pdf">http://unitedplantations.com/sustainability/pdf/Human%20Rights%20Policy.pdf</a></p>	Complied
6.8.2	<p>Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against.</p> <p>- Major compliance -</p>	<p>Interview with local workers and migrant workers shows no discrimination. Interview feedback from workers shows they are happy with the management. There is no complaint that the company is discriminating any worker.</p>	Complied

		Salary payment reviewed did not show any discrimination between female and male workers. Migrant workers had received the same treatment and benefits as per the local workers. Housing facilities provided to the migrant workers are equivalent to the local workers.	
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 -	For local workers, evidence on job vacancies detailing the academic requirements and work experiences. For migrant workers, the selection of workers for hirings was base on interviews at their local country. Due to the country requirement, any migrant workers coming to Malaysia is required to go through FOMENA testing. As this is the requirement set by the government, it is not any form of discrimination for not taking migrant workers due to unfir conditions.	Complied
<b>Criterion 6.9:</b> There is no harassment or abuse in the work place, and reproductive rights are protected.			
6.9.1	Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	The commitment of UP Bhd toward preventing sexual harassment is stated in the Gender Policy undersigned by UP Bhd Chief Executive Director on 24/04/2015. The Gender Policy has been disseminated to the workers through the workers' handbook while to the external parties through Stakeholder Handbook and published at the UP webpage <a href="http://unitedplantations.com/sustainability/pdf/Gender%20Policy.pdf">http://unitedplantations.com/sustainability/pdf/Gender%20Policy.pdf</a> During interview with workers especially female workers, there is not any report on sexual and any other forms of harassment.	Complied
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	The commitment of UP Bhd toward protecting the reproductive rights is stated in the Gender Policy undersigned by UP Bhd Chief Executive Director on 24/04/2015. The Gender Policy has been disseminated to the workers through the workers' handbook while to the external parties through Stakeholder Handbook and published at the UP webpage <a href="http://unitedplantations.com/sustainability/pdf/Gender%20Policy.pdf">http://unitedplantations.com/sustainability/pdf/Gender%20Policy.pdf</a>	Complied

		There is not records of the company is preventing reproductive.	
6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance -	<p>The company has developed Grievance and Redressal Procedure for Sexual Harassment in the Workplace. Workers who have grievance, sexual or violent nature should reported to the committee and recorded in the Misconduct Report Form. It is then submitted to respective Head of Department and copied to the Gender Committee. If the issue was not resolved in 2 weeks from the date of complaint, the issue will be further brought up to Group Manager Human Resources and Environment, Safety &amp; Health. The Group Manager will resolved the issue in consultation with the Company's Executive Committee.</p> <p>There was no any sexual harassment or violence case reported for 2017.</p> <p>Gender committee has been established at United Plantation Berhad and on Business Unit level.</p> <p>The group gender committee chairperson is Shierley Selvasingam</p> <p>For Jendarata POM gender chairperson is V.Suguna while for Jendarata Estate the chairperson is Arpura Mary.</p> <p>The last Group Gender Committee meeting was conducted on 14/06/2018 while the Jendarata POM and Jendarata Estate gender meeting was conducted on 17/01/2018 and 18/04/2018</p>	Complied
<b>Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.</b>			
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	This certification unit does not purchase any FFBs from outgrowers or independent smallholders.	Complied
6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation).	This certification unit does not purchase any FFBs from outgrowers or independent smallholders.	Complied



	- Major compliance -		
6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -	This certification unit does not purchase any FFBs from outgrowers or independent smallholders.	Complied
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	This certification unit does not purchase any FFBs from outgrowers or independent smallholders.	Complied
<b>Criterion 6.11:</b> 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 –	The company is contributing to local development based on official request. Example of request includes – contribution	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 –	Not applicable as there was no scheme smallholders involved in the certification unit.	Not applicable
<b>Criterion 6.12:</b> 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 -	The commitment of UP Bhd toward no forced or trafficked labour is stated in the Human Rights Policy undersigned by UP Bhd Chief Executive Director on 18/08/2017.  The Human Rights policy has been disseminated to the workers through the workers’ handbook while to the external parties through Stakeholder Handbook and published at the UP webpage <a href="http://unitedplantations.com/sustainability/pdf/Human%20Rights%20Policy.pdf">http://unitedplantations.com/sustainability/pdf/Human%20Rights%20Policy.pdf</a>  Workers are free to move around especially for the foreign workers. Although the workers has voluntary surrendered the their passport for save	Complied

		<p>keeping, the workers are able to access to their passport at anytime required. UP had build special lockers which keys are kept by the workers. Interview with workers confirmed that there is no restriction of moment and no restriction to obtain their passport.</p>	
6.12.2	<p>Where applicable, it shall be demonstrated that no contract substitution has occurred.</p> <p>- Minor compliance –</p>	<p>UP conducts its migrant workers hiring by itself. When there is needs to hire, UP will go the country of origin to inform and select the potential workers. Interview with workers confirmed that they knew that when they arrive to Malaysia, they will be working in the palm oil company.</p> <p>In the labor supplier contract, UP had imposed to their contractors that any workers they send to work in UP, it shall be have all the necessary legal document. In the agreement between UP and the contractor, the contractor agrees that they will respects Human Rights and the Guest Workers Policies (Contract between UP and Chin Siong Wai dated 15/03/2018).</p> <p>The contract agreement provided by UP to the labour agent was reviewed and confirmed that the agreement that was provided to the migrant workers are stating that they will be working in the plantations. Interview with te foreign workers confirmed that they knew they will be working in plantations upon arriving in Malaysia.</p>	Complied
6.12.3	<p>Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented.</p> <p>- Major compliance -</p>	<p>The Guest Workers Policy has been established on 07/08/2014 undersinged by the Chief Executive Director.</p> <p>The Guest Workers Policy has been disseminated to the workers through the workers’ handbook while to the external parties through Stakeholder Handbook and published at the UP webpage <a href="http://unitedplantations.com/sustainability/pdf/Human%20Rights%20Policy.pdf">http://unitedplantations.com/sustainability/pdf/Human%20Rights%20Policy.pdf</a></p>	Complied
<p><b>Criterion 6.13:</b> Growers and millers respect human rights.</p>			

6.13.1	<p>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).</p> <p>- Major compliance -</p>	<p>The commitment of UP Bhd toward Human Rights is stated in the Human Rights Policy undersigned by UP Bhd Chief Executive Director on 18/08/2017.</p> <p>Interview conducted with workers that joined the Union confirmed they understood the term of the collective agreement. A copy of the agreement is available at the mill and estate for the reference of the workers.</p> <p>The Human Rights policy has been disseminated to the workers through the workers' handbook while to the external parties through Stakeholder Handbook and published at the UP webpage <a href="http://unitedplantations.com/sustainability/pdf/Human%20Rights%20Policy.pdf">http://unitedplantations.com/sustainability/pdf/Human%20Rights%20Policy.pdf</a></p>	Complied
6.13.2	<p>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.</p>	<p>Not applicable in Peninsular Malaysia.</p>	Not applicable

**Principle 7: Responsible development of new plantings**

**Jendarata Palm Oil Mill** Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this annual surveillance assessment. The immature areas are replanted area.

**Principle 8: Commitment to continual improvement in key areas of activity**

**Criterion 8.1:**

Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.

<p>8.1.1</p>	<p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>• Reduction in use of pesticides(Criterion 4.6);</li> <li>• Environmental impacts (Criteria 4.3, 5.1 and 5.2);</li> <li>• Waste reduction (Criterion 5.3);</li> <li>• Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);</li> <li>• Social impacts (Criterion 6.1);</li> <li>• Optimising the yield of the supply base.</li> </ul> <p>- Major compliance -</p>	<p>The improvement plans are incorporated into the respective criterion. Please refer to the respecte criteria of assessment outcome.</p>	<p>Complied</p>
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**Appendix B: Approved Time Bound Plan**

Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status	
Mill	Time Bound Plan					
<b>Indonesia</b>						
Lada POM PT Surya Sawit Sejati	2018	Lada Estate	3248.63 ha	2018*	Kotawaringin Barat District, Central Kalimantan	RSPO Initial Assessment has been conducted on 11-14 <sup>th</sup> December 2017 for HGU clean & clear areas.
			2509.21 ha	2020**		
		Runtu Estate	2755.77 ha	2018*		
			6144.23 ha	2020**		
		Plasma Lada, Runtu, Arut, Kumai	1813.09 ha	2020***		
<p>*HGU officially obtained on 12th March 2018.  **Pelepasan HPK subject to the issuance of the HGU by Government of Indonesia.  ***Subject to issuance of land title for the members and SK Bupati.</p>						
<b>Malaysia</b>						
Jendarata POM	2008	Jendarata Estate, Seri Pelangi Estate	2008	36009 Teluk Intan, Perak Darul Ridzuan, Malaysia	ASA 2 2019	
Ulu Basir POM	2008	Ulu Basir Estate, Changkat Mentri Estate, Lima Blas Estate	2008	36500 Ulu Bernam, Perak Darul Ridzuan, Malaysia	ASA 2 2019	
Ulu Bernam POM	2008	Ulu Bernam Estate, Sungai Erong Estate, Sungai Chawang Estate	2008	36500 Ulu Bernam, Perak Darul Ridzuan, Malaysia	ASA 2 2019	
UIE POM	2008	UIE Estate	2008	34900 Pantai Remis, Perak Darul Ridzuan, Malaysia	ASA 2 2019	
*RSPO Recertification Assessment have been completed in 2017 and undergo RSPO ASA 1 in 2018.						

**Appendix C: GHG Reporting Executive Summary**

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

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	1.54
PK	1.54

Extraction	%
OER	20.84
KER	4.22

Production	t/yr
FFB Process	202,238
CPO Produced	42,140
PKO Produced	0

Land Use	Ha
OP Planted Area	44,238
OP Planted on peat	4,108.14
Conservation (forested)	7,687.5
Conservation (non-forested)	0
<b>Total</b>	<b>56,033.64</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	89,161.72	0.39	0	0	0	0	89,161.72	0.39
CO <sub>2</sub> Emission from fertilizer	7,606.16	0.08	0	0	0	0	7,606.16	0.08
NO <sub>2</sub> Emmision	12,905.92	0.08	0	0	0	0	12,905.92	0.08
Fuel Consumption	3,319.37	0.01	0	0	0	0	3,319.37	0.01
Peat Oxidation	45,257.94	0.23	0	0	0	0	45,257.94	0.23
<b>Sink</b>								
Crop Sequestration	-86,221.56	-0.43	0	0	0	0	-86,221.56	-0.43
Conservation Sequestration	-834.47	-0.07	0	0	0	0	-834.47	-0.07
<b>Total</b>	<b>71,195.08</b>	<b>0.29</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>76,214.50</b>	<b>0.29</b>

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	2,759.48	0.01
Fuel Consumption	228.31	0
Grid Electricity Utilisation	0	0
<b>Credit</b>		
Export of Grid Electricity	-1,426.74	-0.01
Sales of PKS	0	0
Sales of EFB	0	0
<b>Total</b>	<b>1,561.05</b>	<b>0.01</b>

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

Emissions	tCO <sub>2</sub> e
PK from own mill	13,089.23
PK from other source	0
Fuel Consumptions	0
<b>Total Crusher emissions</b>	<b>13,089.23</b>

\*This mill has no kernel crusher operation.

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

<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	0
Divert to methane captured (flaring) (%)	2
Divert to methane captured (energy generation) (%)	98

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

<b>5.1 Applicability of the general chain of custody requirements for the supply chain</b>			
	<b>Requirement</b>	<b>Evidence</b>	<b>Compliance</b>
5.1.1	The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.	Jenderata POM takes the legal ownership and physically handles RSPO certified FFB from the estates and produce CPO and PK. The SOP (Module D-CPO Mills: IP) has been revised with the new standard June 2017.	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.	Jenderata POM is not receiving the FFB from traders or distributor and itself not at trader or distributor, therefore no license required.	N/A
5.1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.	The Palmtrace ID for Jenderata POM: RSPO_PO1000000238.	Yes
5.1.4	Processing aids do not need to be included within an organization's scope of certification.	This is not refinery, therefore no processing aids is included.	Yes
<b>5.2 Supply chain model</b>			
5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	UP Jenderata POM is using the IP supply chain model since it receive the FFB from own estates. The downgrading procedure from IP to SG is available as per The SOP (Module D-CPO Mills: IP).  For buyer who doesn't require RSPO certified CPO or PK, downgrading can be done from certified material to non-certified material.	Yes
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	UP Jenderata POM is using IP supply chain model since it receive the FFB from own estates.	Yes
<b>5.3. Documented Procedures</b>			



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5.3.1	<p>The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> </ul>	<p>The SOP (Module D-CPO Mills: IP) has been revised with the new standard June 2017 covering all the supply chain elements.</p>	Yes
	<ul style="list-style-type: none"> <li>• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> </ul>	<p>The SCC training has been conducted on 17.03.2018 on the SOP Oil Mill SCC Module D, attended by 14 attendants from various position such as clerk, weighbridge, laboratory assistant, etc. Further records verified as per 5.4.1 and 5.6.1.</p>	Yes
	<ul style="list-style-type: none"> <li>• Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization’s procedures for the implementation of this standard.</li> </ul>	<p>The person having overall responsibility for and authority over the implementation is Head of Oil Mill as per letter of appointment on 29.03.2018 to Mr P. Rajasegaran (Group Engineer, Downriver Jenderata Engineering Department) and also stated in the internal audit minutes of meeting, part B: Compliance with supply chain certification standards (SCCS) 2017-POM.</p>	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>The SOP (Module D-CPO Mills:IP) no 10: has the Internal Audit Procedures as well as SOP for Internal Audit where the SCCS audit shall be conducted in key stations involved in supply chain from purchasing of FFB. Processing, sales, storage, delivery and shipping of RSPO certified oil palm products.</p> <p>The SOP (Module D-CPO Mills:IP) has the internal audit procedure which conforms to the requirement in RSPO Supply Chain Certification Standard and RSPO Market Communication and Claims Documents. Randomly sampled the company letterhead for appointment letter for SCC PIC as well as business card for Group Manager, HRESH.</p>	Yes
	<p>ii) effectively implements and maintains the standard requirements within its organization</p>	<p>Internal audit minutes of meeting, part B: Compliance with supply chain certification standards (SCCS) 2017-POM conducted by Mr. P.Rajasegaran on 15.05.2018.</p>	Yes

**5.4. Purchasing and goods in**

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<p>5.4.1</p>	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply Chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>The records are checked as below:</p> <ol style="list-style-type: none"> <li>1. Delivery note: No: 6254 Document date: 13.2.2018 Delivery date: 14.2.2018 Name &amp; address of buyer: Jenderata POM, Teluk Intan Name &amp; address of seller: Jenderata Estate, Teluk Intan Products: Certified Sustainable FFB Quantity: 35 cages for Division 1 &amp; 2 Transport: Locomotive Supply Chain Cert. No: MUTU-RSPO/068 Unique id: Receipt no: 6254.</li> <li>2. Weighbridge ticket: Document date: 15.2.2018 Delivery date: 15.2.2018 Name &amp; address of buyer: Jenderata POM, Teluk Intan Name &amp; address of seller: Jenderata Estate, Teluk Intan Products: Certified Sustainable FFB Quantity: 25 cages for Division 1 Transport: Locomotive Supply Chain Cert. No: MUTU-RSPO/068 Unique id: Receipt no: 6254.</li> </ol>	<p>Yes</p>
	<ul style="list-style-type: none"> <li>• Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</li> </ul>	<p>Information gathered through multiple records as per 5.4.1 above.</p>	<p>Yes</p>
	<ul style="list-style-type: none"> <li>• The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform</li> </ul>	<p>UP Jenderata POM only receive the FFB from own estates and the mechanism to check the validity of supply chain certification and no. of suppliers as per the appendix A, amended 27.02.18. The flowchart explain for each estate, with certified FFB and certificate number.</p>	<p>Yes</p>

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	per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance.	This is also refer to the SOP on Traceability dated 17.04.2018. Sampled the shipping announcements: Site has the shipping announcement made on 10.07.17 for the above transaction as per 5.6.1. Transaction ID: TR-00b9c441-50df, quantity 650.77 MT product: CSPK IP	
	<ul style="list-style-type: none"> <li>A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (<a href="http://www.rspo.org">www.rspo.org</a>) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements.</li> </ul>	UP Jenderata POM only receive the FFB from own estates and the mechanism to check the validity of supply chain certification and no. of suppliers as per the appendix A, amended 27.02.18. The flowchart explain for each estate, with certified FFB and certificate number. This is also refer to the SOP on Traceability dated 17.04.2018.	Yes
	<ul style="list-style-type: none"> <li>The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements.</li> </ul>	No traders or distributors used in UP Jenderata POM.	N/A
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	The company is only processing certified fruits from its own estate. At the moment all the estates (Jendarata and Seri Pelangi) are certified.	Yes
<b>5.5. Outsourcing activities</b>			
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 independement 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>	There is no outsourcing activity in Jenderata POM.	Yes

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5.5.2	Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: a. The site has legal ownership of all input material to be included in outsourced processes;	There is no outsourcing activity in Jenderata POM.	N/A
	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.	There is no outsourcing activity in Jenderata POM.	N/A
	c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.	There is no outsourcing activity in Jenderata POM.	N/A
	d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.	There is no outsourcing activity in Jenderata POM.	N/A
5.5.3	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	There is no outsourcing activity in Jenderata POM.	N/A
5.5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	There is no outsourcing activity in Jenderata POM.	N/A
<b>5.6. Sales and goods out</b>			
5.6.1	The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form. <ul style="list-style-type: none"> <li>The name and address of the buyer;</li> <li>The name and address of the seller;</li> <li>The loading or shipment/ delivery date;</li> </ul>	Sales goods out document sighted: From June 2017-May 2018, the data of outgoing CPO and PK to Unitata is presented in Sales Contract, Shipping Announcement and Tax Invoices. From June 2017 to Sept 2017, the shipping announcement made not per contract basis, but per actual volume sold.	Yes

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<ul style="list-style-type: none"> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>Sighted the sales contract:</p> <ul style="list-style-type: none"> <li>• Sales Confirmation, contract no: UPKP 201700013 (Unitata) &amp; PK (S/SG)7/17 (Jenderata POM).</li> <li>• Date: 24.01.2017</li> <li>• Product: PK in Bulk (Sustainable PK/SG)</li> <li>• Quantity: 1740 MT</li> <li>• Certificate no:</li> </ul> <p>Tax invoice:</p> <ul style="list-style-type: none"> <li>• Invoice No: 03170839</li> <li>• Date: 15/6/17</li> <li>• Product: PK (S/SG) 7/17 UPKP 201700013</li> <li>• Quantity 500 MT</li> <li>• Certificate No: MUTU-RSPO/068</li> <li>• Transporter: Lorry/Wagon Nos (as per multiple Weighbridge ticket)</li> </ul> <p>Weighbridge Ticket:</p> <ul style="list-style-type: none"> <li>• WB ticket: 37242</li> <li>• Date: 01.06.17</li> <li>• Product: PK</li> <li>• Quantity: 27870 kg</li> <li>• Certificate No: MUTU-RSPO/068</li> <li>• Transporter: Navindran (vehicle no: AAL886)</li> </ul> <p>Sighted the sales contract:</p> <ul style="list-style-type: none"> <li>• Sales Confirmation, contract no: UPKP 201700097 (Unitata) &amp; PK (S/SG)41/17 (Jenderata POM).</li> <li>• Date: 09.11.2017</li> <li>• Product: PK in Bulk (Sustainable PK/SG)</li> <li>• Quantity: 1087 MT</li> </ul> <p>Tax invoice:</p> <ul style="list-style-type: none"> <li>• Invoice No: 03180339</li> <li>• Date: 31/3/17</li> <li>• Product: PK (S/SG) 7/17 UPKP 201700097</li> <li>• Quantity 140.700 MT</li> <li>• Certificate No: MUTU-RSPO/068</li> <li>• Transporter: Lorry/Wagon Nos (as per multiple Weighbridge ticket)</li> </ul> <p>Weighbridge Ticket:</p> <ul style="list-style-type: none"> <li>• WB ticket: 43648</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Date: 29.03.17</li> <li>• Product: PK</li> <li>• Quantity: 23810 kg</li> <li>• Certificate No: MUTU-RSPO/068</li> <li>• Transporter: Abdul Rahman (vehicle no: WT 5136)</li> </ul> <p>For CPO: Sighted the sales contract:</p> <ul style="list-style-type: none"> <li>• Sales Confirmation, contract no: UCPOP 201700085 (Unitata) &amp; CPO (S/IP) 87/17(Jenderata POM).</li> <li>• Date: 16.02.2017</li> <li>• Product: CSPO/IP in Bulk</li> <li>• Quantity: 1250 MT</li> </ul> <p>Tax invoice:</p> <ul style="list-style-type: none"> <li>• Invoice No: 03180615</li> <li>• Date: 08/5/18</li> <li>• Product: CPO (S/IP) 87/17 UCOP 17/85 DELD TO UNITATA)</li> <li>• Quantity 124.890 MT</li> <li>• Certificate No: MUTU-RSPO/068</li> </ul> <p>Transporter: Through pipeline from mill to Unitata (No 1042).</p>	
	<ul style="list-style-type: none"> <li>• Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</li> </ul>	Information gathered through multiple records as per 5.6.1 above.	Yes
	<ul style="list-style-type: none"> <li>• For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance.</li> </ul>	<p>Site has the shipping announcement made on 10.07.17 for the above transaction as per 5.6.1.</p> <p>Transaction ID: TR-00b9c441-50df, quantity 650.77 MT product: CSPK IP</p>	Yes
<b>5.7. Registration of transactions</b>			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> <li>• are mills, traders, crushers and refineries and;</li> <li>• take legal ownership and/or physically handle RSPO Certified Sustainable oil</li> </ul>	UP Jenderata POM is a mill and takes legal ownership and/or physically handle RSPO CSPO.	Yes

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	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.	UP Jenderata POM has the Palmtrace id: RSPO_PO1000000238.	
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> <li>Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.</li> </ul>	<p>The shipping announcement sampled as below:</p> <p>Site has the shipping announcement made on 10.07.17 for the above transaction as per 5.6.1.</p> <p>Transaction ID: TR-00b9c441-50df, quantity 650.77 MT product: CSPK IP</p>	Yes
	<ul style="list-style-type: none"> <li>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</li> </ul>	The volume for RSPO certified is monitored through the continuous account system and palmtrace transaction id.	Yes
	<ul style="list-style-type: none"> <li>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</li> </ul>	No other scheme use for UP Jenderata POM.	Yes
	<ul style="list-style-type: none"> <li>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</li> </ul>	UP Jenderata POM has kept all the RSPO certified volume through shipping announcement in Palmtrace. Seen the records for 1 year from May 2017 to May 2018.	Yes
<b>5.8. Training</b>			
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.	The SCC training has been conducted on 17.03.2018 on the SOP Oil Mill SCC Module D, attended by 14 attendants from various position such as clerk, weighbridge, laboratory assistant, etc.	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	Training been conducted by Mr Goh (Resident Engineer) attended by 14 attendants from various position such as	No



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	requirements. Training shall be specific and relevant to the task(s) performed.	clerk, weighbridge, laboratory assistant, etc. However during the site visit, found that the laboratory conductor and weighbridge operator are not having the good understandings and awareness regarding RSPO SCC although has joined the latest SCC training as above.	
<b>5.9. Record Keeping</b>			
5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	UP Jenderata POM has keep the records such as SOP, training, Palmtrace transactions, sales contracts, internal audit and management review as per RSPO SCC Standard 2017 requirement. Sampled seen as per 5.4.1, 5.6.1.	Yes
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	The records are kept for minimum 2 years as per SOP (Module D-CPO Mills: IP). All records kept in the weighbridge office. Sampled the last 2 years dated 30.06.16, Daily Statement of Jenderata Palm Oil Despatches, signed by group engineer on 29.6.16.	Yes
5.9.3	The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	UP Jenderata POM has using the continuous accounting system where monthly balance monitored in RSPO Certified & Conventional Volume Sold for CPO and PK. Sighted the data for 1 year cycle from May 17 to May 18.	N/A
<b>5.10. Conversion factors</b>			
5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website ( <a href="http://www.rspo.org">www.rspo.org</a> ); RSPO Rules for Physical Transition of Oleochemicals and its Derivaties. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.	This is Palm Oil Mill, so no conversion rate is used. The CPO and PK was extracted based on past actual rate as stated in table 10 above.	Yes
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual	This is Palm Oil Mill, so no conversion rate is used. The CPO and PK was extracted	Yes



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	performance or industry average if appropriate.	based on past actual rate as stated in table 10 above.	
<b>5.11. Claims</b>			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	Site only use the RSPO-General corporate communications since the trademark used is on the file and storage tanks (off-product' claim).	Yes
<b>5.12. Complaints</b>			
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	The complaint are regarding quality of FFB sent to mills received so far, no other issue captured. The records are available since 2016.	Yes
<b>5.13. Management Review</b>			
5.13.1	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.	As per SOP, Jenderata Mill is carry out the management review annually at planned intervals.	Yes
5.13.2	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> <li>• Results of internal audits covering RSPO Supply Chain Certification Standard.</li> <li>• Customer feedback.</li> <li>• Status of preventive and corrective actions.</li> <li>• Follow-up actions from management reviews.</li> <li>• Changes that could affect the management system.</li> <li>• Recommendations for improvement.</li> </ul>	<p>Seen the latest Management Review dated 14.05.18 and cover input:</p> <ol style="list-style-type: none"> <li>1. Internal &amp; External Result for RSPO P&amp;C &amp; MSPO and SCC. There was no NCR raised by external auditors during RSPO Main Assessment in 07.08.17 POM and supply bases. There are no key observation raised by external auditors during RSPO main assessment.</li> <li>2. Customer feedback: Feedback from supply estates, FFB grading's are done on daily and witness by Estate Assistance with laboratory personnel. The common issues are high FFA in CPO and high dirt in PK.</li> <li>3. Status of preventive and corrective actions: No CAPs as no NC raised. Preventive action: Management monitor the performance or quality of every CPO sample before dispatch.</li> <li>4. Changes that could affect the management system: No changes</li> </ol> <p>Recommendations for improvement: Close monitoring and avoid receiving off-spec crop quality and ensure minimal oil losses during processing.</p>	Yes

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5.13.3	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> <li>• Improvement of the effectiveness of the management system and its processes.</li> <li>• Resource needs.</li> </ul>	<p>Seen the latest Management Review dated 14.05.18 and cover output: This is the 1<sup>st</sup> management review conducted for RSPO SCC. Improvement and resource needed will be discussed (if any) but since no changes required, so no resource needed. Improvement for customer feedback: Any feedback will be made through Unitata Marketing Department.</p>	Yes
<b>General corporate communications</b>			
4.1	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>	<p>During the site visit and documentation review, it was found that the 7 CPO storage tanks in Jenderata POM and file documents has the RSPO trademark without the trademark license display.</p> <p>However, based on the 'RSPO Trademark' definition in RSPO Rules on Market Communications &amp; Claims (version 2016), "RSPO Trademark" is defined as: The RSPO registered mark consisting of a rounded palm top accompanied by the letters 'RSPO', the (™) mark and accompanied by a valid license number. Company also only having the Trademark license under Unitata Berhad, (number: RSPO 1106002 valid from 06.10.16-05.10.18), not United Plantation Berhad.</p>	No
4.2	<p>In corporate communications a member is allowed to:</p> <ol style="list-style-type: none"> <li>display its RSPO membership status</li> <li>display the RSPO web address (<a href="http://www.rspo.org">www.rspo.org</a>)</li> <li>state that the member supports the work of the RSPO</li> <li>state the member's history with regard to the RSPO.</li> <li>Use the RSPO trademark to promote its membership of the RSPO.</li> </ol> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at <a href="http://www.rspo.org">www.rspo.org</a>' where the link must lead to the member's profile page.</p>	<p>Jenderata POM has used the RSPO trademark at 7 CPO storage tanks and sustainability files and the objective is to promote its membership.</p>	Yes
4.3	<p>In corporate communications RSPO members must not make any statement that</p>	<p>No statement been made for the trademark used.</p>	Yes

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	may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.		
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.	The products, CPO and PK are not using the RSPO trademark. The trademark used is on the file and storage tank.	Yes
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.	No RSPO corporate logo used as evidence during the document audit and site visit.	Yes
<b>Business to business communications</b>			
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.	Jenderata POM did not use business to business communications since the CPO and PK to own refinery, Unitata Berhad therefore, this requirement is not applicable.	N/A
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Jenderata POM did not use business to business communications since the CPO and PK to own refinery, Unitata Berhad therefore, this requirement is not applicable.	N/A
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: A. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.  B. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	Jenderata POM did not use business to business communications since the CPO and PK to own refinery, Unitata Berhad therefore, this requirement is not applicable.	N/A

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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>	<p>Jenderata POM did not use business to business communications since the CPO and PK to own refinery, Unitata Berhad therefore, this requirement is not applicable.</p>	N/A
<b>Business to consumer communication</b>			
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>	<p>Jenderata POM did not use business to consumer communication since the CPO and PK to own refinery, Unitata Berhad therefore, this requirement is not applicable.</p>	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>	<p>Jenderata POM did not use business to consumer communication since the CPO and PK to own refinery, Unitata Berhad therefore, this requirement is not applicable.</p>	N/A
6.3	<p>When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.</p>	<p>Jenderata POM did not use business to consumer communication since the CPO and PK to own refinery, Unitata Berhad therefore, this requirement is not applicable.</p>	N/A
6.4	<p>Business to consumer communication shall not include information about the claimant's RSPO membership status.</p>	<p>Jenderata POM did not use business to consumer communication since the CPO and PK to own refinery, Unitata Berhad therefore, this requirement is not applicable.</p>	N/A
6.5	<p>Members shall not communicate to consumers information about their suppliers' RSPO membership status.</p>	<p>Jenderata POM did not use business to consumer communication since the CPO and PK to own refinery, Unitata Berhad therefore, this requirement is not applicable.</p>	N/A
6.6	<p>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.</p>	<p>Jenderata POM did not use business to consumer communication since the CPO and PK to own refinery, Unitata Berhad therefore, this requirement is not applicable.</p>	N/A

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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.	Jenderata POM did not use business to consumer communication since the CPO and PK to own refinery, Unitata Berhad therefore, this requirement is not applicable.	N/A
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified 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 <a href="http://www.rspo.org">www.rspo.org</a> .	Jenderata POM did not use business to consumer communication since the CPO and PK to own refinery, Unitata Berhad therefore, this requirement is not applicable.	N/A

**MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES**

**Certified oil palm content (IP)**

	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.	There is no non-certified FFB bought. The FFB coming from own estate and use the IP model. If there is any demand for conventional CPO & PK, Jenderata POM will downgrade the certified CSPO/CSPK directly to conventional products. This is confirmed during site visit and documentation verified.	Yes
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**Labelling and trademark (IP)**

	Members are allowed to use the RSPO label in one of the following ways: <ul style="list-style-type: none"> <li>• RSPO trademark which includes the tag 'CERTIFIED' or</li> </ul>	This labelling for IP is not been used by Jenderata POM in both CPO and CPKO.	N/A
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	RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.		
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> <li>• The oil palm products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.</li> </ul>	This messaging in labels or trademark is not been used by Jenderata POM in both CPO and CPKO.	N/A
<b>5.12. Complaints</b>			
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	The complaint are regarding quality of FFB sent to mills received so far, no other issue captured. The records are available since 2016.	Yes
<b>5.13. Management Review</b>			
5.13.1	The organization is required to hold management reviews annually at planned intervals appropriate to the scale and nature of the activities undertaken	As per SOP, Jenderata Mill is carry out the management review annually at planned intervals.	Yes

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<p>5.13.2</p>	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> <li>• Results of internal audits covering RSPO Supply Chain Certification Standard.</li> <li>• Customer feedback</li> <li>• Status of preventive and corrective actions</li> <li>• Follow-up actions from management reviews.</li> <li>• Changes that could affect the management system.</li> <li>• Recommendations for improvement.</li> </ul>	<p>Seen the latest Management Review dated 14.05.18 and cover input:</p> <ol style="list-style-type: none"> <li>1. Internal &amp; External Result for RSPO P&amp;C &amp; MSPO and SCC. There was no NCR raised by external auditors during RSPO Main Assessment in 07.08.17 POM and supply bases. There are no key observation raised by external auditors during RSPO main assessment.</li> <li>2. Customer feedback: Feedback from supply estates, FFB grading's are done on daily and witness by Estate Assistance with laboratory personnel. The common issues are high FFA in CPO and high dirt in PK.</li> <li>3. Status of preventive and corrective actions: No CAPs as no NC raised. Preventive action: Management monitor the performance or quality of every CPO sample before dispatch.</li> <li>4. Changes that could affect the management system: No changes</li> <li>5. Recommendations for improvement: Close monitoring and avoid receiving off-spec crop quality and ensure minimal oil losses during processing.</li> </ol>	<p>Yes</p>
<p>5.13.3</p>	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> <li>• Improvement of the effectiveness of the management system and its processes</li> <li>• Resource needs.</li> </ul>	<p>Seen the latest Management Review dated 14.05.18 and cover output:</p> <p>This is the 1<sup>st</sup> management review conducted for RSPO SCC. Improvement and resource needed will be discussed (if any) but since no changes required, so no resource needed. Improvement for customer feedback: Any feedback will be made through Unitata Marketing Department.</p>	<p>Yes</p>



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

<b>Supply Chain Modular Requirements (Identity Preserved/Segregation/Mass Balance)</b>			
<b>Module D – CPO Mills: Identity Preserved</b>			
<b>D.1 Definition</b>			
D.1.1	A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.	Jenderata POM has the complete procedure and method to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls, and volume sales of RSPO certified products. No uncertified FFB received in Jenderata POM.	Yes
<b>D.2 Explanation</b>			
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.	The projection for certified FFB and production of certified CPO and PK in UP POM has been recorded in BSI’s public summary report and registered in RSPO IT Platform.	Yes
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).	IT Platform (PalmTrace) with ID RSPO_PO1000000238.	Yes
<b>D.3 Documented procedures</b>			
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;	Jenderata POM have the documented procedures from receiving of certified FFBs to processing and finally dispatches of RSPO certified CPO and RSPO certified PK as per SOP (Module D-CPO Mills; Identity Preserved), date issued 27.02.2018, Revision no 4.	Yes



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	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.	The person having overall responsibility for and authority over the implementation is Head of Oil Mill as per letter of appointment on 29.03.2018 to Mr P. Rajasegaran (Group Engineer, Downriver Jenderata Engineering Department) and also stated in the internal audit minutes of meeting, part B: Compliance with supply chain certification standards (SCCS) 2017-POM.	
D.3.2	The site shall have documented procedures for receiving and processing certified FFBS.	Jenderata POM have the documented procedures from receiving of certified FFBS to processing and finally dispatches of RSPO certified CPO and RSPO certified PK as per SOP (Module D-CPO Mills; Identity Preserved), date issued 27.02.2018, Revision no 4.	Yes
<b>D.4 Purchasing and goods in</b>			
D.4.1	The site shall verify and document the tonnage and sources of certified FFBS received.	Jenderata POM has the real time basis report through the monthly record in 'RSPO Certified and Conventional Volume Sold'. Sighted from May 2017-May 2018, a total of 34,689.90 MT for CSPO and 8,128.94 MT for CSPK was produced. While the FFB certified tonnage is 156,085.59 MT.  The total sold volumes 'RSPO Certified and Conventional Volume Sold' was 31,036.82mt of CPO and 7,837.74mt of PK.	Yes
D.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	As per SOP Module D-CPO Mills: IP, the oil mills shall inform CB immediately if there is a projected overproduction of certified tonnage.	Yes
<b>D.5 Record keeping</b>			
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.  <i>IP Mill must report on real time basis.</i>	Jenderata POM has the real time basis report through the monthly record in 'RSPO Certified and Conventional Volume Sold'. Sighted from May 2017-May 2018, a total of 34,689.90 MT for CSPO and 8,128.94 MT for CSPK was produced while for FFB certified tonnage is 156,085.59 MT of FFB/month (MT).	Yes
<b>D.6 Processing</b>			
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.	All FFB received and processed are from certified sources, which are from own estates. If the demand is for conventional CPO and PK, the 1:1 downgrade is used.	Yes



**Supply Chain Declaration**

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit (June 17 – May 18)</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply bases (MT)</b>	<b>Volume of FFB from uncertified supply bases (MT)</b>	<b>Total FFB/Month (mt)</b>
1	May 2017	12,614.29	-	12,614.29
2	June 2017	12,306.15	-	12,306.15
3	July 2017	13,631.22	-	13,631.22
4	August 2017	13,973.79	-	13,973.79
5	September 2017	13,196.07	-	13,196.07
6	October 2017	12,132.47	-	12,132.47
7	November 2017	13,560.85	-	13,560.85
8	December 2017	11,177.86	-	11,177.86
9	January 2018	11,177.91	-	11,177.91
10	February 2018	7,942.09	-	7,942.09
11	March 2018	10,763.99	-	10,763.99
12	April 2018	11,361.80	-	11,361.80
13	May 2018	12,247.10	-	12,247.10
	<b>TOTAL</b>	<b>156,085.59</b>	<b>-</b>	<b>156,085.59</b>

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<b>B. Monthly Records of Certified CPO &amp; PK since the last audit (May 17 – May 18)</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (MT)</b>	<b>Certified PK (MT)</b>
1	May 2017	2864.90	656.95
2	June 2017	2801.39	640.90
3	July 2017	3131.13	709.91
4	August 2017	3090.07	727.75
5	September 2017	2912.84	687.25
6	October 2017	2,742.94	631.86
7	November 2017	2,950.25	706.25
8	December 2017	2,432.18	582.14
9	January 2018	2,369.66	582.15
10	February 2018	1,768.42	413.62
11	March 2018	2,328.46	560.59
12	April 2018	2,583.27	591.72
13	May 2018	2,714.39	637.83
	<b>TOTAL</b>	<b>34,689.90</b>	<b>8,128.94</b>

<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace to Buyers since the last audit (if any) records base on transaction May 2017-May 2018</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>Palmtrace Trading No</b>	<b>Certified CPO Sold (MT)</b>	<b>Certified PK Sold (MT)</b>
1	Unitata Berhad	As per pre audit information	27,433.36	
2	Unitata Berhad	As per pre audit information		7,837.74
	<b>TOTAL</b>		<b>27,433.36</b>	<b>7,837.74</b>

<b>D. Records of CPO &amp; PK Sold under other schemes to Buyers since the last audit (if any)</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>Scheme Name</b>	<b>CPO Sold (MT)</b>	<b>PK Sold (MT)</b>
-Nil-				

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<b>E. Records of CPO &amp; PK Sold as conventional to Buyers since the last audit (May 2017 – May 2018)</b>			
<b>No.</b>	<b>Buyers Name</b>	<b>CPO Sold (MT)</b>	<b>PK Sold (MT)</b>
1	As confidential	3,603.46	-
<b>TOTAL</b>		<b>3,603.46</b>	-

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

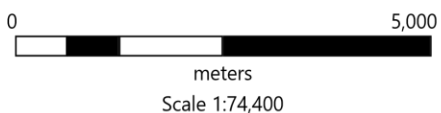
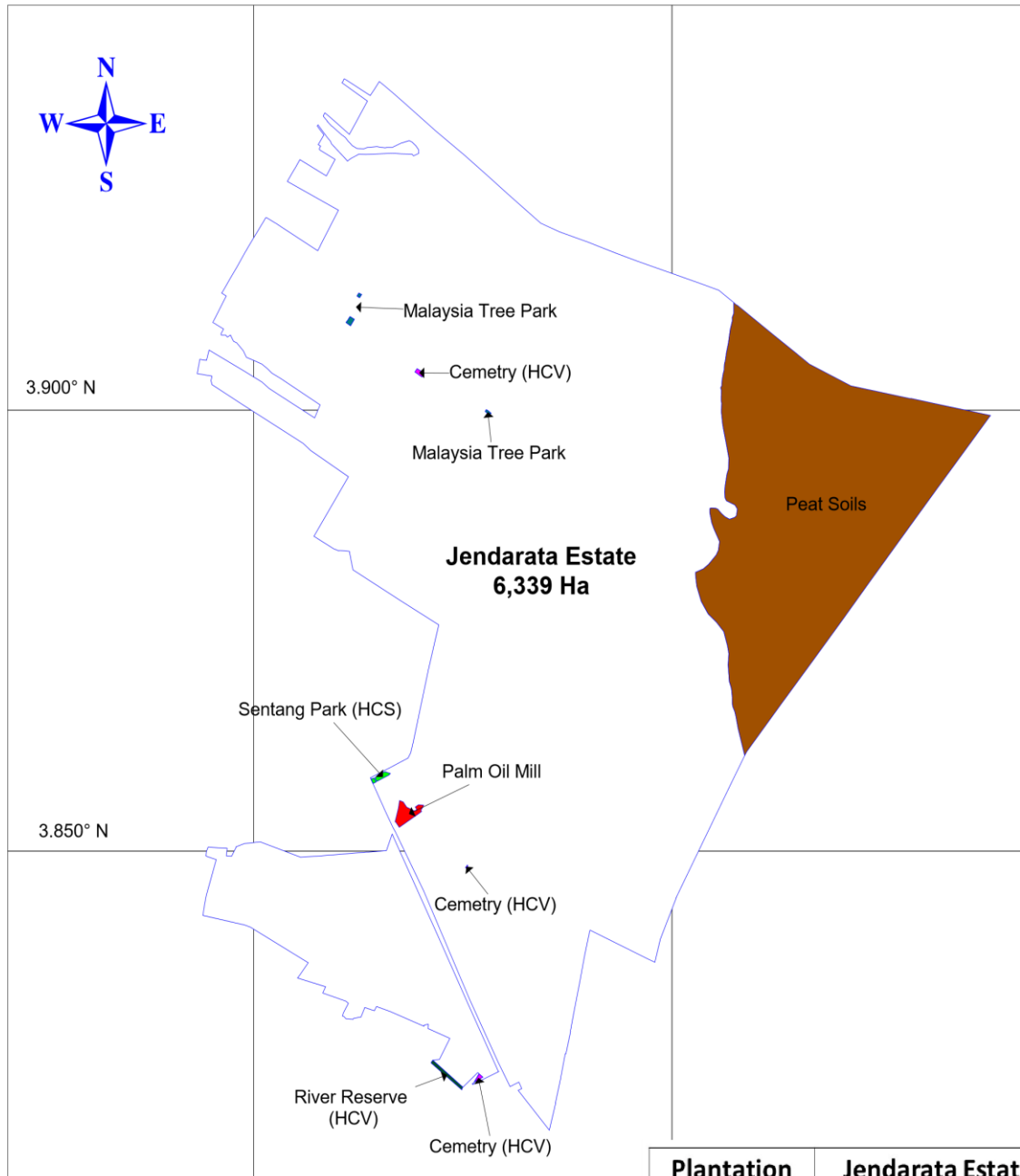
**Appendix F: Location Map of Jendarata Palm Oil Mill and Supply bases**



**Appendix G: Jendarata Estate Field Map**

100.950° E

101.000° E

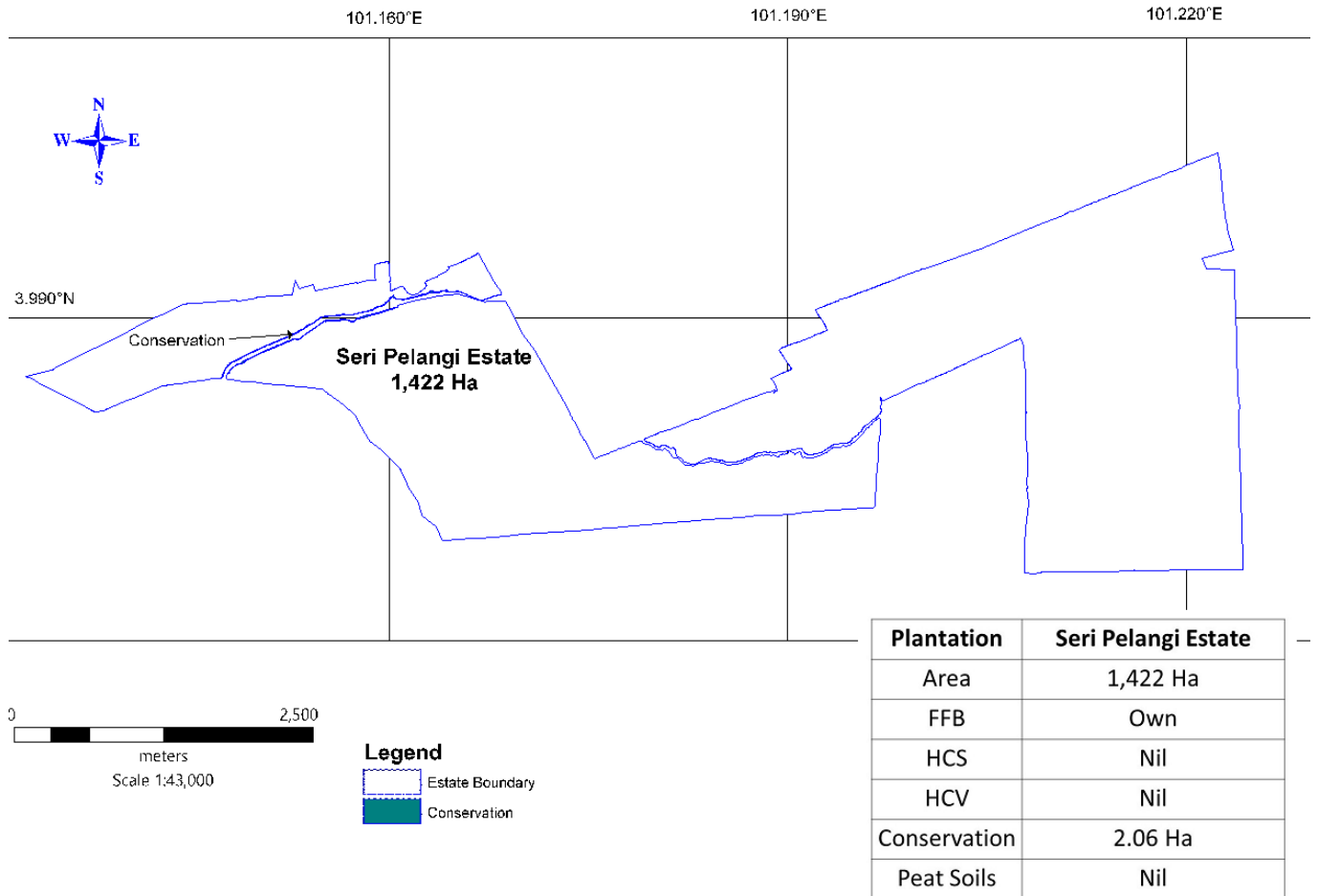


**Legend**

- Estate Boundary
- Palm Oil Mill
- HCV
- HCS
- Cemetery (HCV6)
- Conservation
- Peat Soils

Plantation	Jendarata Estate
Area	6,339 Ha
FFB	Own
HCS	1.39 Ha
HCV	3.15 Ha
Conservation	1.09 Ha
Peat Soils	623 Ha

**Appendix H: Seri Pelangi Estate Field Map**





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

Not applicable

## Appendix J: List of Abbreviations

BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
CU	Certification Unit
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
MRM	Management Review Meeting
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