

**RSPO PRINCIPLE AND CRITERIA –
1st ANNUAL SURVEILLANCE ASSESSMENT (ASA2_1)
Public Summary Report**

Johor Corporation
Client company Address: Kulim (Malaysia) Berhad K.B. 705 80990 Johor Bahru Johor, Malaysia
Certification Unit: Sedenak Palm Oil Mill and supply base Location of Certification Unit: KB 721 80990 Kulai, Johor Malaysia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0080-09-000-00	Membership Approval Date	15/06/2009
Parent Company Name	Johor Corporation		
Address	KB 705 80990 Johor Bahru, Johor, Malaysia		
Subsidiary (Certification Unit Name)	Kulim (M) Berhad - Sedenak Palm Oil Mill		
Address	KB 721 80990 Kulai, Johor, Malaysia		
Contact Name	Mrs Salasah Elias		
Website	www.kulim.com.my	E-mail	salasah@kulim.com.my
Telephone	07 8611611	Facsimile	07 8631084

2. Certification Information			
Certificate Number	RSPO 537873	Date of First Certification	23/01/2009
		Certificate Start Date	23/01/2019
		Certificate Expiry Date	22/01/2024
Scope of Certification	Palm oil and Palm Kernel Production		
Applicable Standards	RSPO P&C MY-NI 2014; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module E – Mass Balance)		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-DE119-60192022	ISCC EU	ASG CERT	12/03/2020
QMS 00705	ISO 9001:2008	SIRIM QAS International Sdn Bhd	14/10/2020
MSPO 697951	MSPO 2530-4:2013	BSI Services Malaysia Sdn Bhd	09/03/2020
MSPO 697952	MSPO 2530-3:2013	BSI Services Malaysia Sdn Bhd	09/03/2020

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Sedenak Palm Oil Mill	Kulai, Johor, Malaysia	1° 43' 47.41" N	103° 32' 21.97" E
Sedenak Estate	Kulai, Johor, Malaysia	1° 42' 48.79" N	103° 31' 36.24" E

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Ulu Tiram Estate	Ulu Tiram, Johor, Malaysia	1° 37' 28.02" N	103° 47' 26.40" E
Kuala Kabong Estate	Kulai, Johor, Malaysia	1° 41' 20.10" N	103° 26' 0.87" E
Basir Ismail Estate	Kota Tinggi, Johor, Malaysia	1° 37' 47.84" N	103° 54' 52.07" E

5. Description of Supply Base

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Sedenak Estate	2619.69	26.39	161.92	2808.00	93.29
Ulu Tiram Estate	478.08	23.11	196.86	698.05	68.488
Kuala Kabong Estate	1622.70	12.01	83.61	1718.32	94.44
Basir Ismail Estate	2906.77	50.69	239.17	3196.63	90.932
Total	7627.24	112.2	681.56	8421.00	347.15

6. Plantings & Cycle

Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Sedenak Estate	302.25	309.81	1602.73	404.90	0	2317.44	302.25
Ulu Tiram Estate	3.30	211.91	0	24.15	238.72	474.78	3.30
Kuala Kabong Estate	0	0	1298.54	324.16	0	1622.70	0
Basir Ismail Estate	208.05	1422.42	782.71	493.59	0	2698.72	208.05
Total (ha)	513.69	1944.14	3683.98	1246.8	238.72	7113.64	513.60

7. Certified Tonnage of FFB (Own Certified Scope)

Estate	Tonnage / year		
	Estimated (Jan 19-Dec 19)	Actual (Oct 18-Aug 19)	Forecast (Jan 20-Dec 20)
Sedenak Estate	70,492.50	39,011.02	52,808.00
Ulu Tiram Estate	13,516.10	9,454.56	10,886.00
Kuala Kabong Estate	45,104.80	27,201.46	34,674.00
Basir Ismail Estate	84,181.50	52,264.57	67,933.00
Total	213,294.90	127,931.60	166,301.00

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8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estate	Tonnage / year		
	Estimated (Jan 19-Dec 19)	Actual (Oct 18-Aug 19)	Forecast (Jan 20-Dec 20)
Rengam	N/A	702.09	N/A
Siang		6478.45	
Sungai Papan		639.95	
Ladang Sindora		286.34	
Total		8106.83	

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (Jan 19-Dec 19)	Actual (Oct 18-Aug 19)	Forecast (Jan 20-Dec 20)
Asam Bubok	5,766.00	4368.62	7,076
Kebun Sedenak	3,582.00	3255.98	3,582
Ree Fong	9,283.00	6103.50	8,827
Koperasi Pesara	-	646	-
Peladang Jb	2,351.00	5631.96	-
Bukit Siput	20,131.00	12538.75	19,134
Sedenak Bahru	2,278.00	3334.55	2,280
Che Yu Trading	15,557.00	12677.53	13,813
Per. Sri Mahtai	10,274.00	2602.69	10,254
Hong Hui	46,319.00	50565.83	43,920
Choon Guan	32,288.00	16769.77	29,789
Per. Sri Misan	15,559.00	15913.92	14,057
Fong Tak	12,371.00	6151.34	11,989
Keng Ann	12,885.00	13104.13	12,884
Guan Leng	71,841.00	59695.19	68,278
Sindora Timber	-	-	-
Peladang Kulai	3,020.00	1610.36	3,020
Per. Md Sangidi	17,456.00	13317.41	19,193
Az Iman	4,851.00	8232.73	4,854
Hwa Lee	-	6741.02	7,200

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Koperasi Mampan	-	-	1,200
PPNJ	-	-	2,349
Genting		292.90	
Bousted Chamek		184.54	
Bousted Kulai Yong		267.83	
Total	285,812.00	244,006.55	283,699.00

10. Certified Tonnage			
Mill Capacity: 90 MT/hr	Estimated (Jan 19-Dec 19)	Actual (Oct 18-Aug 19)	Forecast (Jan 20-Dec 20)
	FFB	FFB	FFB
SCC Model: MB	213,294.90	136,038.44	166,301.00
	CPO (OER: 21.88%)	CPO (OER: 20.87%)	CPO (OER: 22.48%)
	46,679.00	28,385.61	37,384.46
	PK (KER: 5.65%)	PK (KER: 5.49%)	PK (KER: 5.85%)
	12,048.00	7,477.84	9,728.61

11. Actual Sold Volume (CPO) (Oct 18-Aug 19)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	3,639.22	13,213.39	-	8,673.20	25,525.81

Conventional product = product that is produced using certified FFB but sold without RSPO claim.

12. Actual Sold Volume (PK) (Oct 18-Aug 19)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	813.60	-	-	5,997.50	6,811.10

Conventional product = product that is produced using certified FFB but sold without RSPO claim.

13. Actual Group certification Claims (Oct 18-Aug 19)		
	Credit	Physical Volume (MT)
IS-CSPO	-	-
IS-CSPKO	-	-
IS-CSPKE	-	-

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: ASI-ACC-067)
BSI Services Malaysia, Suite 29.01
Level 29 The Gardens North Tower,
Mid Valley City Lingkaran Syed Putra ,
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BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted from 29/09 – 3/10/2019. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

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

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

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

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

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

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification 2)	Year 2 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)
Sedenak Palm Oil Mill	✓	✓	✓	✓	✓
Sedenak Estate	✓	✓	✓	✓	✓
Ulu Tiram Estate	✓	✓	✓	✓	✓
Kuala Kabong Estate	✓	✓	✓	✓	✓
Basir Ismail Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: October 12, 2020 – October 15, 2020

Total No. of Mandays: 13.0 mandays including one day SC audit for mill

2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Elzy Ovktafia Chairul	Team Leader	She graduated from Universiti Putra Malaysia in Diploma of Agriculture while Licentiate Diploma and Advanced Diploma from the Incorporated Society of Planters. She involve in audits and technical reviews works mainly for Sustainability Programme includes RSPO and MSPO for more than 3 years in more than 11 countries. She is a qualified Lead Auditor/Auditor for MSPO, RSPO P&C, RSPO NEXT, RSPO SCC, ISO 9001:2015, ISO 14001:2015 and Social Compliance Audit by Verite. Prior to this, she was the Agronomist in R&D Department for 5 years in Oil Palm Plantation where her task involved in all Oil Palm Plantation Operations such as conducting experimental trials on Research & Development with technical paper publications, Crop Forecast, Leaf & Soil Sampling Collection, Fertilizer Recommendation, Pest and Diseases Training, Quality Control as well as special project namely Yield Intensification Project and Food for Palm Project for estates. During assessment, she covers the legal issues, land use rights, stakeholder consultation, worker’s welfare and social issues.
Muhamad Naqiuddin Mazeli	Team Member	He hold Bachelor of Science Horticulture at University Putra Malaysia. He has 11 years working experience in oil palm plantation industry as sustainability team. Joining the sustainability team, he managed, implement and monitors the RSPO, ISCC, MSPO and ISO 9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training related to RSPO, MSPO and other certifications where applicable to the operations during previous company. He is a trained as Safety and Health Officer, Food Safety System (FSSC and ISO 22000) for Mill and refineries, ISO 9001, ISO 45001 and already attend HCV training with Proforest. During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, safety and health, environmental and workers and stakeholders consultation. He is fluent in Bahasa Malaysia and English languages.
Amir Bin Bahari	Team Member	He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996. He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 38 man-days in the auditing profession after ending career in the plantation industry. During the assessment he covered mills and estates best practices, workers consultation and occupational safety & health. He is fluent in both verbal/written in Bahasa Malaysia and English.
Hafriazhar Mokhtar	Team Member	Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and

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		Thailand. He has been trained in the RSPO P&C and SCCS standards and recently completed his RSPO P&C Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea and Solomon Islands. During assessment, he covered the supply chain elements in the mill. He is fluent in Bahasa Malaysia and English languages.
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Accompanying Persons:

No.	Name	Role
	Nil	

2.3 Assessment Plan

Date	Time	Subjects	EO	MN	AB	HM
Saturday 28/09/2019	PM	Audit Team travelling to Johor Bahru (Mutiara Hotel)	√	√	√	√
Sunday 29/09/2019	0830-0900	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader • Confirmation of assessment scope and finalize • Audit plan (including stakeholder’s consultation) • Verification on previous audit findings 	√	√	√	√
	0900-1230	Sedenak Palm Oil Mill: Inspection of FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.	√	√	√	-
	0900-1700	Sedenak Palm Oil Mill: RSPO Supply Chain for CPO mill, weighbridge and storage area	-	-	-	√
	1230-1330	Lunch Break				
	1330-1700	Sedenak Palm Oil Mill: Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc.	√	√	√	√
	1700-1730	Interim Closing Briefing	√	√	√	√

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Date	Time	Subjects	EO	MN	AB	HM
Monday 30/09/2019	0900–1230	Sedenak Estate: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant & etc.), agrochemical mixing area, schedule waste management, worker housing, clinic, landfill & etc.	√	√	√	-
	1230–1330	Lunch Break	√	√	√	-
	1430-1600	Meeting with stakeholders (local community rep. neighbors, smallholders, workers/Union rep, vendor etc.)	√	-	-	-
	1330–1700	Sedenak Estate: Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√	-
	1700–1730	Interim Closing Briefing	√	√	√	-
Tuesday 01/10/2019	0900–1230	Ulu Tiram Estate: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant & etc.), agrochemical mixing area, schedule waste management, worker housing, clinic, landfill & etc.	√	√	√	-
	1230–1330	Lunch Break	√	√	√	-
	1330–1700	Ulu Tiram Estate: Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√	-
	1700–1730	Interim Closing Briefing	√	√	√	-
Wednesday 02/10/2019	0900–1230	Basir Ismail Estate: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant & etc.), agrochemical mixing area, schedule waste management, worker housing, clinic, landfill & etc.	√	√	√	-

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Date	Time	Subjects	EO	MN	AB	HM
	1230–1330	Lunch Break	√	√	√	-
	1330–1700	Basir Ismail Estate: Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√	-
	1700–1730	Interim Closing Briefing	√	√	√	-
Thursday 03/10/2019	0900–1230	Kuala Kabong Estate: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant & etc.), agrochemical mixing area, schedule waste management, worker housing, clinic, landfill & etc.	√	√	√	-
	1230–1330	Lunch Break	√	√	√	-
	1330–1600	Kuala Kabong Estate: Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√	-
	1600-1700	Audit team discussion & findings preparations	√	√	√	-
	1700–1730	Closing Meeting 1. Presentation of report by BSI Lead Auditor – briefing & discussion of findings. 2. Acceptance & acknowledgement by Sedenak Palm Oil Mill & Estates.	√	√	√	-
Friday 03/10/2019	AM	Audit Team travel back to KL.	√	√	√	-

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- Johor Corporation/Kulim (Malaysia) Berhad’s Multiple Management Units / Time Bound Plan
- RSPO P&C 2013 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C GA-NIWG 2017
- RSPO P&C INA-NIWG 2016
- RSPO P&C MY-NIWG 2014
- RSPO P&C PNG-NIWG 2017

3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills?	Yes. For Malaysia the group estate have been completed certified. For Indonesia, PT Win (PT SSR, PT HBS, and PT WSK) was completed disposal on December 2017. Currently Kulim acquire PT TPR and PT Raj was now under rehabilitation process.	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	Yes, Kulim group certified within 5 years.	Yes
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	Yes, Kulim have a new acquire PT TPR and PT RAJ in September 2016. Currently not certified and was under rehabilitation for 5 years.	Yes
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	No changes.	Yes
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	There is no isolated lapse in Time Bound Plan except for smallholder proposed certification program that halted due to unstable supply to the mil.l	Yes
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No. Failure to certify all smallholder as per time bond plan due to justified problem i.e. insufficient budget by smallholder and etc.	Yes
Have there been any stakeholder comments?	So far, there is no comment received.	Yes

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Un-Certified Units or Holdings		
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	So far, no new planting that replaced primary forest	Yes
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No new planting activities within all uncertified unit.	Yes
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6. The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker . The progress on the Liabilities shall be verified and reported.	No land conflict within all uncertified units.	Yes
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No labour dispute within all uncertified units.	Yes
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance within all uncertified units.	Yes
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	RSPO internal audit assessment for all uncertified units has been conducted and the report had been submitted to all unit for improvement plan. The report indicated no systematic failures to proceed with implementation that should be raised as major non-conformities.	Yes

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

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

3.4 Details of findings

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

During the 1st annual surveillance assessment there was one (1) Major nonconformity raised. The Sedenak 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 it effectiveness and closed accordingly.

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1830966-201906-M1	Clause & Category (Major / Minor)	Indicator 2.1.1 Major
Date Issued	03/10/2019	Due Date	02/01/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	24/12/2019
Statement of Nonconformity:	1. Labour law permit for salary deduction (Surau) is not available in Sedenak POM. 2. Employment Act 1955: The salary deduction made was not correct in Ulu Tiram Estate & Kuala Kabong Estate.		
Requirement Reference:	Evidence of compliance with relevant legal requirements shall be available.		
Objective Evidence:	1. In Sedenak POM: Sighted pay slips sampled shown deduction categorized as Advance amounting for Rodi Hartono (RM202 –Aug; RM202 – Jun 19; RM202 – Apr 19), Muhammad Shafik bin Salman (RM302 – Aug 19; RM202 – Jun 19; RM252 – Apr 19) and Edi Jaya Saputra (RM202 –Aug; RM202 – Jun 19; RM202 – Apr 19). Records of Workers Monthly Surau Contribution and interview with workers and payroll staff confirmed that the actual advance paid was only RM200 whilst RM2 was for Surau contribution where the JTK permit for Surau was not obtained. 2. In Kuala Kabong Estate, it was found that, a worker, Sri Utami was deducted RM2 for Sukan contrary to the agreement between Estate and Sri Utami sighted for only RM1 in June 2019 pay slip. In Ulu Tiram Estate, the payment for Public Holiday pay on August 2019 for Sudar & Sumarno were short of RM1.62 for both workers (pekerja Perusahaan Mewah Hijau).		
Corrections:	1. The mill management is arranging for JTK permit application, meantime memo being issued to inform all workers that Mill Management will stop to carry out salary deduction for surau with effect from October 2019 onward until proper approval obtained from JTK. 2. The Management of Ladang Kuala Kabong has repaid/refunded the RM1.00 to Sri Utami on 03/10/2019. Estate have paid the underpaid amount to the respective workers on 3.10.2019. The contractor also had been reminded on this issue. 3. Estate have paid the underpaid amount to the respective workers on 2.10.2019. The contractor also had been reminded on this issue.		
Root Cause Analysis:	1. The Surau deduction was carried out voluntarily with consent from the workers and only involved those who agreed – not all workers being deducted for the issue. 2. Deduction for sport contrary to the agreement between Estate and Sri Utami, where a RM2.00 was wrongly deducted from her instead of RM1.00 as per the permit authorized or approved by the Labour Office.		

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	<p>3. Public holidays were underpaid by RM0.83/day for 2 workers of Perusahaan Mewah Hijau. The paid holiday was RM 41.50 instead of RM 42.31 for minimum rate of wages. The contractor had made mistake on the minimum daily rated calculation for public holiday pay for these two workers.</p>
Corrective Actions:	<p>1. HCMD to survey all deduction permit required by all OUs for possible applying Blanket approval for the Company.</p> <p>2. Monitoring will always be done in compliance with the 1955 Act, which is in accordance with the deduction and amount which authorized by the Labour Office. The estate will also enforce checklist issue by CFD Closing deadline of account and checkroll as a tools for preventive measures to avoid recurrences issue and avoid incorrect payment in checkroll in future.</p> <p>3. Estate is to provide the calculation guide for the Contractor with regards to checkroll calculation as matter of guide to prevent further mistakes by contractors. A briefing is to be conducted by estates to their contractors with understanding on the minimum wages for their employees' as per minimum wages order 2018 – scheduled to be conducted during the 2nd week of November 2019.</p>
Assessment Conclusion:	<p>Audit team have reviewed the evidence submitted on 24/12/2019 and the major NC is satisfactorily closed on 24/12/2019. Continuous implementation of corrective action taken will be further verified in the next assessment visit.</p> <p>Evidence reviewed:</p> <ol style="list-style-type: none"> 1. Email from Wan Adlin (Head of Engineering Department) dated 03/10/2019 to all mill manager and all mill assistants to stop deduction that not authorized by JTK even though the employees have given written consent with immediate effect. At the moment, company is yet to decide on the need of Surau deduction therefore no application been made. 2. Only 3/32 have requested for blanked approval for salary deduction to Human Capital Management Department. Seen the survey list and application form. 3. Petty cash voucher, payment no: 190000131 dated 03/10/2019 to Sri Utami for Pulangan Duit Sukan (RM 1.00) and interviewed Sri Utami on the acknowledge receipt. 4. The establishment of operating units monthly checklist which covered closing checkroll in every 1st day of the month to check on the checkroll payment involved chief clerk and assistant manager. 5. Refunded the amount of RM 0.81 X 2 = RM 1.62 for both Sudar and Sumarno dated 01/10/2019 in the petty cash book. This is also has been verified through interview. 6. Briefing on minimum wages and its calculation to contractor on 03.11.2019 been conducted to contractors (TBK Plantation & Perusahaan Mewah Hijau)

Opportunity for Improvements	
OFI #	Description
-	-

Positive Findings	
PF #	Description
PF 1	Good cooperation among the team during the audit.

3.4.1 Status of Nonconformities Previously Identified and Observations

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1692792-201809-M1	Clause & Category (Major / Minor)	RSPO SCCS E4.2 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	10/01/2019
Statement of Nonconformity:	CB has not been informed on the projected overproduction of certified tonnage incurred.		
Requirement Reference:	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.		
Objective Evidence:	Sedenak Palm Oil Mill: Overproduction of certified tonnage recorded with the surplus of 53,672.98 mt compared with certificate volume of 153,544 mt from October 2017 to September 2018.		
Corrective Actions:	Establish computerized Data Dashboard System for compilation of Production/processing tonnage data to be updated online on monthly basis and to be shared with all relevant parties through Google Drive for online viewing, analysis and reconciliation		
Assessment Conclusion:	<p>ASA2_1 verification:</p> <p>No overproduction issue. Based on the records of Todate FFB Received dated 28/9/2019 for FFB received from own certified, group certified and non-certified source sighted available. Other than own supplying estates (Sedenak, Ulu Tiram, Basir Ismail & Kuala Kabong), external suppliers including the sample sighted as following:</p> <ul style="list-style-type: none"> - Kebun Sedenak - Peladang Kulai - Guan Leng - Ree Fong <p>October 2018 – August 2019: Total FFB received: 379,767.51 mt Certified FFB: 135,992.80 mt Uncertified FFB: 243,774.71 mt Total FFB processed: 379,767.51 mt Total CPO produced: 79,355.83 mt Total PK produced: 20,867.96 mt Total CPO despatched: 59,870.98 mt Total PK despatched: 1,055.72 mt</p>		

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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1692792-201809-M2	Clause & Category (Major / Minor)	Indicator 4.6.6 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	10/01/2019
Statement of Nonconformity:	Storage of pesticides not according to recognised best practices		
Requirement Reference:	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). Best practices requirements references: i) Environmental Quality (Scheduled Waste) Reg 2005 (Regulation 9 - Storage of Scheduled Waste) ii) FAO (Food and Agriculture Organization) Manual (Pesticide Storage and Stock Control Manual) iii) Guidelines on storage of Hazardous Chemicals 2006 by DOSH Malaysia iv) Own Kulim (M) Berhad SOP 2nd Issue Dec 2016 Work Instruction for Chemical Store		
Objective Evidence:	<p>Ulu Tiram Estate: New unused Lubricants and Scheduled wastes were stored in same store location without proper separation as per best practices</p> <p>Kuala Kabong Estate: Scheduled waste (SW 409) were stored together with agro-chemical such as Storm, Glyphosate and Ally without SDS, designated containment or container and signage in General Store and Tools Store. Sprayers changing room was used as Tools Store.</p>		
Corrections:	1) Ulu Tiram Estate - Lubricant and schedule waste store was separated. 2) Kuala Kabong Estate - Immediate action has been taken. All chemicals, scheduled wastes and tools have been isolated and placed to the right store. All tools are kept in tools store. Sprayers changing room only kept for sprayer clothes.		
Assessment Conclusion:	ASA2_1 verification: From the implementation in Ulu tiram estate, the inspection was done by weekly as per evidence latest date 21/9/2019 and previously was on 16/9/2019. Inspection was done by mandore verified during interview. The training also been done properly dated 23 Sept 2019 attended by Store keeper.		

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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1692792-201809-N1	Clause & Category (Major / Minor)	Indicator 2.1.3 Minor
Closed (Yes / No)	Yes	Date of nonconformity Closure	03/10/2019
Statement of Nonconformity:	Lapses of implementation of the following Acts / Regulations was sighted at the Biogas Plant Laboratory.		
Requirement Reference:	A mechanism for ensuring compliance shall be implemented. Requirements: Occupational Safety and Health (Use and Standards of Exposure of Chemicals Hazardous to Health) Regulations 2000: - Section 9 (1) An employer shall not carry out any work which may expose or is likely to expose any employee to any chemical hazardous to health unless he has made a written assessment of the risks created by the chemical to the health of the employee.		
Objective Evidence:	Sedenak Palm Oil Mill: CHRA report conducted for Sedenak Mill on 11/3/2015 shown only the following chemicals being assessed: - Mobil Pegasus 710 - Coolant The Chemical Register dated 8/1/2015 shown 17 chemicals were in used such as COD Test Reagent, pH 4.01 Buffer Colour Solution, Visocolour Eco Alkalinity TA and etc. not being assessed.		
Corrective Actions:	Mill to seek consultation from KSTS for any new installations / new stations, in terms of regulations/ requirements and/or required actions to be done to comply with legal requirements and regulations.		
Assessment Conclusion:	ASA2_1 verification: The chemical that been used under Biogas available under new amendment CHRA (JKKP HQ/03/ASS/00/154-2018/064) dated 10-13 December 2018 prepared by HJH Noormahani Harun from QMSPRO Sdn Bhd. All chemical already been include under new CHRA, from progress report September 2018 dated 8 October 2018, the Biogas already been close due to leakage at Anaerobic Digester Tank (ADT No. 2) dated 13 Sept 2018. The Biogas was close until todote.		

Opportunity for Improvements	
OFI #	Description
OFI 1	-

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1692792-201809-M1	Major	SCCS E4.2	11/10/2018	Closed out on 10/01/2019
1692792-201809-M2	Major	4.6.6	11/10/2018	Closed out on 10/01/2019
1692792-201809-N1	Minor	2.1.3	11/10/2018	Closed out on 03/10/2019
1830966-201906-M1	Major	2.1.1	03/10/2019	Closed out on 24/12/2019

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



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

List of Stakeholders Contacted	
Internal Stakeholders Field workers Mill workers NUPW representative Gender committee General workers Contractor’s workers	Union/Contractors/Local Communities Local village (MPKK Kampung Melayu Sedenak) Neighbour estate (Kebun Sedenak Sdn Bhd) Contractor (Punitha Enterprise)
Government Departments School (SK Nam Heng, SJK(T) Ladang Sedenak)	NGO So far no complaint/comment from NGO, therefore no NGO contacted.

IS #	Description
1	<p>Feedbacks: <u>Schools</u> Schools has received full support from the management through the contribution. However, there are some request such as:</p> <ol style="list-style-type: none"> 1. SK Nam Heng: Road widening in front of school and hump. 2. SJK(T) Ladang Sedenak: Request to catch snake in store room, small plot for student’s agriculture activity and humps in school compound. <p>Management Responses: Management noted on the request and will have action plan to implement it.</p> <p>Audit Team Findings: No other issue.</p>
2	<p>Feedbacks: <u>MPKK Kampung Melayu Sedenak</u></p> <ol style="list-style-type: none"> 1. The exit road from mill to outside is oily. 2. There was an incident of broken bund in Sedenak POM which affecting the water source to the villagers. 3. Other than that, the relationship between villagers and management is good. Management has provides the paint and clean the mosque in Kampung Melayu Sedenak. <p><u>FELDA Ulu Tebrau</u></p>

	<p>1. Management has maintained a good relationship with Felda villagers, for example is Kembara Mahkota Johor 2019.</p> <p><u>FELDA Bukit Batu</u> Kuala Kabong Estate has given good support to the community by collaborating event such as Maulidur Rasul and Sukan Rakyat. Only one request been made which is to arrange the lorry avoiding peak hour (school times out) from using the main road for school children safety since an accident occurred last year.</p> <p>Management Responses: Management noted on the request and will have action plan to implement it.</p> <p>Audit Team Findings: Will be verified in the next surveillance assessment.</p>
<p>3</p>	<p>Feedbacks: <u>FFB supplier (Kebun Sedenak Sdn Bhd)</u></p> <p>1. Since there was an incident of broken bund in Sedenak POM occurred in the past 2 months, they have to send their FFB to other Kulim mill which was Sindora POM. However, the FFB price paid in Sindora is not as per agreement in Sedenak POM which is lower. Email on the price enquiry has been sent by Kebun Sedenak Sdn Bhd to Sedenak POM 2 months ago and by hand this week but yet to receive any respond.</p> <p><u>Electrical supplier (Maju Estate Supply Trading)</u> Timing of work is in weekday for Johor state (Sunday) but weekend for most of the shops make it difficult to find spare parts.</p> <p>Management Responses: 1. Mill management has escalated the issue to the Marketing Department and already responded to the e-mail explaining why there are differences in the FFB prices which are transportation charge and FFB quality. Noted on the request and will arrange the best time to implement the works.</p> <p>Audit Team Findings: Verified the correspondences between Kebun Sedenak Sdn Bhd and Kulim Marketing Department. Will be verified in the next surveillance assessment.</p>
<p>4</p>	<p>Feedbacks: <u>Contractor (Punitha Enterprise)</u></p> <p>1. Rubbish collection has been made 3-4 days in a week and will be sent from linesite to landfill.</p> <p><u>Contractor (Soko SK Enterprise)</u> There were 8 contract workers in Basir Ismail Estate and stayed in the estate housing. So far, no complaint with regards of workers, payment, agreement, etc. Everything went well and estate has maintained a good relationship with the contractor.</p> <p>Management Responses: Management noted on the information and will continue the good practices.</p> <p>Audit Team Findings: No other issue.</p>
<p>5</p>	<p>Feedbacks: <u>Contractor Worker in Ladang Ulu Tiram (Jono)</u> The salary payment from his boss (the contractor) is late which is sometimes at 15th.</p> <p>Management Responses: Management will have a meeting and inform contractor immediately.</p> <p>Audit Team Findings: Will be verified in the next surveillance assessment.</p>

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Formal Signing-off of Assessment Conclusion and Recommendation	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Sedenak Palm Oil Mill has yes with the RSPO P&C MY-NI 2014 & RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Sedenak Palm Oil Mill is approved and continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
<p>Name: Elzy Ovktafia Chairul</p>	<p>Name: Salasah Elias</p>
<p>Company Name: BSI Services Malaysia Sdn Bhd</p>	<p>Company Name: Kulim Malaysia Berhad</p>
<p>Title: Client Manager</p>	<p>Title: Deputy General Manager</p>
<p>Signature:</p> 	<p>Signature:</p> <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p> 
<p>Date: 05/01/2020</p>	<p>Date: 14/01/2020</p>

Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Commitment to Transparency			
Criterion 1.1: Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	Adequate information covering environmental, social and legal issues which are relevant to RSPO Criteria and stakeholders is shared for effective participation and decision making. In company website (http://www.kulim.com.my/) publicly available documents are published such as OSH plan, HCV documents, negotiation procedure, complaint records, sustainability handbook and report, EIA, Management Plans & Continuous Improvement Plans. Other sensitive information such as land title and etc. will be provided upon request.	Yes

Criterion / Indicator		Assessment Findings	Compliance
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	<p>All operating units maintain records of information request and response. Request for information are attended promptly and confirmed by stakeholders interviewed. In both the mill and estates, there is an enquiry register record. Few records of requests being the recent transactions sighted available in all operating units such as Enquiry Register Record; for Sedenak Palm Oil Mill and supply bases.</p> <p>Sighted below sampled:</p> <ol style="list-style-type: none"> 1. Inspection of Department of Environment to Sedenak POM on 17/09/2019. 2. JKPP Audit/Visit/Inspection Book (JH/04/04/610) at Sedenak Estate. 3. JKPP Audit/Visit/Inspection Book JH/06/04/2211 at Ulu Tiram Estate. 4. Laporan Lawatan Pegawai JKPP Ladang Basir Ismail at Basir Ismail Estate. 5. OSHA Book at Kuala Kabong Estate. 	Yes
<p>Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p>			

<p>1.2.1</p>	<p>Publicly available documents shall include, but are not necessary limited to:</p> <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). <p>- Major compliance –</p>	<p>There is a SPO (Sustainability Palm Oil) Transparency Program dated 04.09.2017 under Kulim Malaysia Berhad. The procedure is to meet the requirements of this criterion and when requested are readily available. The Corporate Department will ensure that the following documents do not impinge on confidentiality and will not cause detrimental sustainability or social outcomes. Among the documents made available for viewing are:</p> <ul style="list-style-type: none"> a) Land title (held as hard copy by the property department) b) Health and safety plan c) Plans and impact assessment- environmental & social d) Pollution prevention plans e) Details of complaints and grievances f) Negotiation procedures g) Continuous improvement plan h) Biodiversity plans i) Policy documents (sustainability handbook) <p>In addition to the website, company policies were also displayed at various locations of the operating units, for example, at mill offices, estates main notice boards and muster ground notice boards for employees and visitors to view.</p> <p>Records such as enquiry register, and record of government visits documented the visit or request from the stakeholders.</p> <ul style="list-style-type: none"> - Polisi Insan; Signed by Executive Director; Date: 1/5/2018 - Polisi Pengurusan Pengetahuan; Signed by Executive Director; Date: 1/5/2018 - Polisi Konflik Kepentingan; Signed by Executive Director; Date: 1/5/2018 - Polisi Kemampanan; Signed by Executive Director; Date: 1/5/2018 - Polisi Etika; Signed by Executive Director; Date: 1/5/2018 - Polisi Bisnes; Signed by Executive Director; Date: 1/5/2018 - Polisi Alam Sekitar; Signed by Executive Director; Date: 1/5/2018 	<p>Yes</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Polisi Tiada Hadiah dan Keraian; Signed by Executive Director; Date: 1/5/2018 - Polisi Pencegahan dan Pembasmian Gangguan Seksual di Tempat Kerja; Signed by Executive Director; Date: 1/5/2018 - Polisi Berkaitan Keselamatan dan Kesihatan Pekerjaan; Signed by Executive Director; Date: 1/5/2018 - Polisi Kilanan; Signed by Executive Director; Date: 1/5/2018 - Right of Employees; Signed by Executive Director; Date: 8/1/2017 	
Criteria 1.3:			
Growers and millers commit to ethical conduct in all business operations and transactions.			
1.3.1	<p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.</p> <p>-Minor compliance</p>	<p>Established as Polisi Etika (Ethical Policy) and Polisi Konflik Kepentingan (Conflict of Interest Policy); both Signed by company's Executive Director; Dated: 1/5/2018. Policy has been communicated to all workers by the management at each operating units within Sedenak complex. Sighted latest was done on 01/08/2019 attended by 94 people in Sedenak POM, 11/06/2019 attended by 228 people in Sedenak Estate, 25/09/2019 attended by 129 people in Ulu Tiram Estate, 12/09/2019 attended by 282 people in Basir Ismail Estate and 28/01/2019 attended by 128 people in Kuala Kabong Estate.</p>	Yes
Principle 2: Compliance with applicable laws and regulations			
Criterion 2.1:			
There is compliance with all applicable local, national and ratified international laws and regulations.			

<p>2.1.1</p>	<p>Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p>	<p>Legal register covering the applicable local and international laws and regulations are available. Compliance to each applicable law and regulation is monitored by the operating units and head office sustainability team.</p> <p>Sample of licenses and permits checked at visited operating units:</p> <ol style="list-style-type: none"> 1. Sedenak POM: JTK permit for electricity deduction permit refer permit (9)d/m.PTKJB/10101/29571(PMT) dated 16 March 2012. 2. Sedenak POM: JTK for salary deduction under Section 24, Employment Act 1955 (Reference number: TK (NJ) U-21 dated 31/03/2019 for Kelab Sukan dan Rekreasi not more than RM 10.00/month for each worker that has applied. 3. Sedenak POM: JTK permit for salary deduction under Section 24, Employment Act 1955 (Reference number: TK (NJ) U-21 dated 31/03/2019 for Skim Khairat Keluarga Perbadanan Johor RM 5.00/month and premium package not more than RM 37.50/month for each worker that has applied. 4. Sedenak POM: JTK permit for salary deduction under Section 24, Employment Act 1955 (Reference number: TK (NJ) U-21 dated 31/05/2019 for medical cost that exceeded the limit than the company limit. 5. Sedenak POM: JTK permit for overtime limit (160 hours) (Reference No: PP5/29/003/20111) expired on 28.02.2013 and continue with JTK permit (Reference No: (11) d/m. PTKJB/10101/29571 (PMT) dated 26/02/2013. 6. Sedenak Estate: JTK permit for salary deduction for MAA insurance, khairat keluarga and Tambang Bas Sekolah (Reference no: PP3/29/0201) dated 01.04.1999. 7. Sedenak Estate: JTK permit for salary deduction for electricity bill with subsidize rate of RM 12/month (Reference no: (11) d/m.BMB.7/2/35/9 (2) dated 29/09/1984. New application for JTK approval was made on 12/04/2017, 15/04/2018 and 24/01/2019 but so far the status is in progress. Further verification made with 	<p>Major nonconformance</p>
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		<p>the Johor Bharu JTK officer (Puan Norazean) on the phone, previous PIC (Puan Nor Cahaya) is no more available, therefore the estate is advised to resubmit again the application to her.</p> <ol style="list-style-type: none"> 8. Ulu Tiram Estate: JTK permit for salary deduction for Great Eastern Life (RM10/month) for 12 months (reference no: TK (NJ) U – 21 dated 09/08/2018). 9. Ulu Tiram Estate: JTK permit for salary deduction for Skim Khairat Keluarga Perbadanan Johor not more than RM 43/month (reference no: TK (NJ) U – 21 dated 09/08/2018). 10. Ulu Tiram Estate: JTK permit for salary deduction for Skim Khairat Keluarga Perbadanan Johor RM 5/month and premium pay not more than RM 37.50/month. (reference no: TK (NJ) U – 21 dated 31/03/2019). 11. Ulu Tiram Estate: JTK permit for salary deduction for water bill after subsidy rate of RM10/pax for single and RM50/pax for family resident (reference no: TK (NJ) U – 21 dated 09/08/2018). 12. Ulu Tiram Estate: JTK permit for salary deduction for electricity bill after subsidy rate of RM20/pax for single and RM60/pax for family resident (reference no: TK (NJ) U – 21 dated 09/08/2018). 13. Ulu Tiram Estate: JTK permit for salary deduction for Tabung Haji saving not more than RM160/month (reference no: TK (NJ) U – 21 dated 09/08/2018). 14. Ulu Tiram Estate: JTK permit for salary deduction for Temple fund not more than RM4/month (reference no: TK (NJ) U – 21 dated 09/08/2018). 15. Ulu Tiram Estate: JTK permit for salary deduction for Kelab Sukan dan Rekreasi not more than RM 10/month (reference no: TK (NJ) U – 21 dated 31/03/2019). 16. JTK Permit: Surat Akuan Penerimaan Peralatan Permainan Dan Pembelajaran Untuk Pusat Asuhan Kanak-Kanak di Ladang. 17. EHA Certificate: Lembaga Pendaftaran Pembantu-Pembantu Rumah Sakit Ladang (certificate no: Q1545) on 06/03/1987. 	
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		<ol style="list-style-type: none"> 18. Basir Ismail Estate: JTK permit for salary deduction for Skim Khairat Keluarga Perbadanan Johor RM 5/month and premium pay not more than RM 37.50/month. (reference no: TK (NJ) U – 21 dated 31/03/2019. 19. Basir Ismail Estate: JTK permit for salary deduction for Kelab Sukan dan Rekreasi not more than RM 10/month (reference no: TK (NJ) U – 21 dated 31/03/2019. 20. Basir Ismail Estate: JTK permit for salary deduction under Section 24, Employment Act 1955 (Reference number: TK (NJ) U-21 dated 02/05/2019 for medical cost that exceeded the limit than the company limit. 21. Basir Ismail Estate: JTK permit for salary deduction under Section 24, Employment Act 1955 (Reference number: (4) dlm. PTKJB/10101/34989 (PMT)) dated 27/08/2012 for Surau, Khairat Bulanan, Khairat Insuran Skim, AMESU dan Tabung Haji. 22. Basir Ismail Estate: JTK permit for salary deduction under Section 24, Employment Act 1955 (Reference number: (2) dlm. PTKJB/10101/34989 (PMT)) dated 18/01/2012 for Kelab Sukan, Khairat, Surau & Bil Elektrik. 23. Kuala Kabong Estate: JTK permit for salary deduction under Section 24, Employment Act 1955 (Reference number: PP3/29/001/2008) dated 14/02/2008 for water and electricity not more than RM50/month. 24. Kuala Kabong Estate: JTK permit for salary deduction under Section 24, Employment Act 1955 (Reference number: PP3/29/002/2008) dated 14/02/2008 for Surau not more than RM1.00. 25. Kuala Kabong Estate: JTK permit for salary deduction under Section 24, Employment Act 1955 (Reference number: TK (NJ) U – 21 dated 31/03/2019 for Skim Khairat Keluarga Perbadanan Johor RM5/month and premium package not more than RM37.50/month). 	
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		<ul style="list-style-type: none"> 26. Kuala Kabong Estate: Lembaga Pendaftaran Pembantu-Pembantu Hospital Estate (Registration no: Q1966 dated 27/08/2008 for Yahaya bin Saari). 27. Kuala Kabong Estate: JTK permit for salary deduction under Section 24, Employment Act 1955 (Reference number: TK (NJ) U – 21 dated 31/03/2019 for Kelab Sukan dan Rekreasi not more than RM10/month. 28. Sedenak Mill: License CePPOME- CePPOME/00139 29. Sedenak Mill: License for AESP – NW-SRO-AE-R-1192-R valid till 20 August 2021 & NW-HQ-AE-2433-M valid till 22 Oct 2019. 30. Sedenak Mill: License for Engine Driver gred 1 31. Sedenak Mill: MPOB license – 500058304000 valid till 31/12/2019 32. Sedenak Mill: Diesel License – KPDNHEP.J-JB/26/05A/11/1057(P/D) (P12) valid until 15 Jan 2020. 33. Sedenak Mill: (MSA Altair 5X) Gas Tester last calibrate on 10 May 2019 34. Sedenak estate: MPOB license 501224 -702000 valid until 31/3/2020 35. Sedenak estate: License for abstraction river water valid until 31 December 2019. 36. Sedenak estate: JH PMT 22735 valid until 22 Sept 2020 37. Sedenak estate: License for Toll referred 00947 valid 31 December 2019 38. Sedenak estate: Diesel/Petrol License (KPDNKK.J-JB/26/5A/11/248(P/D)(P12)) valid until 30 Mac 2020. 39. Sedenak estate: License for AGT –NW-NJHR-AGT-R-0565-Q valid until 14/11/2020 40. Ulu Tiram Estate: MPOB license 501257302000 valid until 31 March 2020 41. Ulu Tiram Estate: KPDNKK license PDNHEP.J-JB/26/05A/11 for diesel and Fertiliser was available valid until 9 Oct 2019 	
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		<p>42. Ulu Tiram Estate: Weighbridge license B1241292 valid until 14 August 2019</p> <p>43. Ulu Tiram Estate: Air compressor JH PMT 22863 valid until 22 July 2019</p> <p>44. Basir Ismail Estate: KPDNKK.JKTG/Permit 0153 (PD) for Diesel valid until 10 March 2020</p> <p>45. MPOB license 501258102000 valid until 31 March 2020</p> <p>46. License for Air compressor JH PMT 24676 valid until 16/9/2020</p> <p>47. Kuala Kabong Estate: MPOB License 503896302000 valid until 31 March 2020</p> <p>48. Kuala Kabong Estate: Diesel and Petrol license referred to 851(P/D) valid until 9 May 2020.</p> <p>49. Kuala Kabong Estate: PMT license for PMT-JH/19 80376 valid until 11 Sept 2020.</p> <p>50. Kuala Kabong Estate:</p> <p>51. Weighbridge calibration from Metrology Corporation Malaysia Sdn Bhd. Valid until 8 Oct 2020.</p> <p>However, some of the legal requirements were found not yes as below:</p> <p>1. In Sedenak POM: Sighted pay slips sampled shown deduction categorized as Advance amounting for Rodi Hartono (RM202 –Aug; RM202 – Jun 19; RM202 – Apr 19), Muhammad Shafik bin Salman (RM302 – Aug 19; RM202 – Jun 19; RM252 – Apr 19) and Edi Jaya Saputra (RM202 – Aug; RM202 – Jun 19; RM202 – Apr 19). Records of Workers Monthly Surau Contribution and interview with workers and payroll staff confirmed that the actual advance paid was only RM200 whilst RM2 was for Surau contribution where the JTK permit for Surau was not obtained.</p>	
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Criterion / Indicator		Assessment Findings	Compliance
		<p>2. In Kuala Kabong Estate, it was found that, a worker, Sri Utami was deducted RM2 for Sukan contrary to the agreement between Estate and Sri Utami sighted for only RM1 in June 2019 pay slip. In Ulu Tiram Estate, the payment for Public Holiday pay on August 2019 for Sudar & Sumarno were short of RM1.62 for both workers (pekerja Perusahaan Mewah Hijau).</p>	
2.1.2	<p>A documented system, which includes written information on legal requirements, shall be maintained.</p> <p>- Minor compliance -</p>	<p>All operating units maintain documented system for identifying, evaluating, reviewing and updating applicable regulations and other requirements. Legal and Other Requirement Register dated 31 August 2019 was sighted at the visited operating units. As to date there was no changes of legal incorporated in the register.</p>	Yes

Criterion / Indicator	Assessment Findings	Compliance										
<p>2.1.3 A mechanism for ensuring compliance shall be implemented. - Minor compliance -</p>	<p>Assessment at the Sedenak Biogas Plant Laboratory found that the Occupational Safety and Health (Use and Standards of Exposure of Chemicals Hazardous to Health) Regulations 2000 has not been yes with, in particular:</p> <p>Section 5 (1) An employer shall identify and record in a register all chemicals hazardous to health used in the place of work; and</p> <p>Section 9 (1) An employer shall not carry out any work which may expose or is likely to expose any employee to any chemical hazardous to health unless he has made a written assessment of the risks created by the chemical to the health of the employee.</p> <p>Evaluation of legal requirements and compliance status with legal requirement is monitored by operating units, Sustainability Team, OHS Department and head office audit Department. Evaluation of compliance is part of the audit checklist as the sustainability team was assigned to cover RSPO P&C requirements. The latest internal audit was conducted for each estate and the report is available for review. Internal audit is available as per below detail:-</p> <table border="1" data-bbox="994 1010 1845 1251"> <thead> <tr> <th>Estate/Mill</th> <th>Date internal audit</th> </tr> </thead> <tbody> <tr> <td>Sedenak Mill</td> <td>26/8/2019</td> </tr> <tr> <td>Sedenak estate</td> <td>26/8/2019</td> </tr> <tr> <td>Kuala kabong, Basir ismail</td> <td>27/8/2019</td> </tr> <tr> <td>Ulu tiram estate</td> <td>22/8/2019</td> </tr> </tbody> </table>	Estate/Mill	Date internal audit	Sedenak Mill	26/8/2019	Sedenak estate	26/8/2019	Kuala kabong, Basir ismail	27/8/2019	Ulu tiram estate	22/8/2019	<p>Yes</p>
Estate/Mill	Date internal audit											
Sedenak Mill	26/8/2019											
Sedenak estate	26/8/2019											
Kuala kabong, Basir ismail	27/8/2019											
Ulu tiram estate	22/8/2019											

Criterion / Indicator	Assessment Findings	Compliance	
2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance -	Tracking system available to identify changes in the relevant regulations through head office, sustainability team, website information and the information are communicated from the Head Office. Kulim (Malaysia) Berhad have centralised system for tracking any changes in the law. The tracking law person incharge is Miss Handayani Bagong (RMC/COM/GM/18/10) dated 27/6/2018 who will maintain the changes in laws and updated the Legal and other requirement. For Basir Ismail Estate, the tracking law person incharge is Miss Nurfazliwati Suzana Zainal(RMC/COM/GM/18/09) dated 27/6/2018. No changes from previous surveillance.	Yes
Criterion 2.2: The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.			

<p>2.2.1</p>	<p>Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -</p>	<p>Sedenak Mill 13.07 Ha including, water pond, Pome, Mill and Bioplant. <u>In Sedenak Estate</u> Documents showing legal ownership total 10 titles. Quit rent for 2018 has been paid by HQ as per Debut Note Ref. # R003; Dated 20/3/2018. Sighted samples: - Title # 354796; Mukim: Sedenak; Lot # 817; Area: 1,225.3881ha; Date registered: 24/7/2009 - Title # 237392; Mukim: Sedenak; Lot # 964; Area: 21.4357ha; Date registered: 27/12/2007 - Title # 237337; Mukim: Sedenak; Lot # 969; Area: 1.6617ha; Date registered: 27/12/2007 <u>Ulu Tiram Estate</u> Area statement 26/4/2017: Planted: 501.66ha; Area statement 2/7/2018: Planted: 478.08ha. Documents showing legal ownership total 29 titles. Quit rent for 2018 has been paid by HQ as per Debit Note Ref. # S61571; Dated 20/3/2018. Sighted samples: - Title # GN 96631: Lot # PTD 16; Area: 20.69 ha; Date registered: 15/10/1996 - Title # CT560: Lot # PTD 17; Area: 8.21 ha; Date registered: 27 Oct 2005 - Title # CT564: Lot # PTD 1175; Area: 8.23; Date registered: 20 Sept 2005 - Title # H.S(D) 358854: Lot # PTD 105798; Area: 144.52; Date registered: 7 August 2003 <u>Basir Ismail Estate:</u> Area statement 15/1/2019: Planted: 2,906.77ha; Documents showing legal ownership total 29 titles. Sighted samples: - Title # 105258; Mukim: Sungai Tiram; Lot # 806; Area: 217.8217ha; Date registered: 15/6/2004 - Title # 22664; Mukim: Sungai Tiram; Lot # 1419; Area: 1061.4888ha; Date registered: 13 March 1968 - Title # 29320; Mukim: Sungai Tiram; Lot # 1519; Area: 1607.3691ha; Date registered: 10 Jan 1989</p>	<p>Yes</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p><u>Kuala Kabong estate</u> Area statement Jan 2019: Planted 1622.70 ha : Document showing legal ownership total 1 title. Sighted samples: -Title # 41938; Mukim Bukit Batu; Lot # 10294; Area: 1718.32ha date registered 27 December 2007.</p>	

Criterion / Indicator		Assessment Findings	Compliance																																								
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	<p>All the Estates possessed maps showing the locations of boundary stones/pegs that have been physically located and marked. Inspection of boundary stones/markers during the field visits confirmed that they were clearly marked and maintained.</p> <table border="1"> <thead> <tr> <th>No</th> <th>Estate</th> <th>Boundary site</th> <th>Neighboring properties</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Sedenak</td> <td>P01/Block 6</td> <td>Smallholder</td> </tr> <tr> <td></td> <td></td> <td>P01/Block 5</td> <td>Kg Melayu Sedenak</td> </tr> <tr> <td>2</td> <td>K Kabong</td> <td>Pineapple farm</td> <td>P01/Block 4</td> </tr> <tr> <td></td> <td></td> <td>Smallholder</td> <td>P02/Block 2</td> </tr> <tr> <td></td> <td></td> <td>Smallholder</td> <td>P01/Block 1</td> </tr> <tr> <td>3</td> <td>Basir Ismail</td> <td>P98B/Block 1</td> <td>Pulada Camp</td> </tr> <tr> <td></td> <td></td> <td>P13/Block 1</td> <td>Kg Air Putih</td> </tr> <tr> <td>4</td> <td>Ulu Tiram</td> <td>P89/Block 1</td> <td>FELDA Ulu Tebrau</td> </tr> <tr> <td></td> <td></td> <td>P12/Block 1</td> <td>Pelangi Indah Development</td> </tr> </tbody> </table> <p>Guidelines on the placement of boundary markers are provided by the KMB Group Estates Dept via letter dated 12/11/07</p>	No	Estate	Boundary site	Neighboring properties	1	Sedenak	P01/Block 6	Smallholder			P01/Block 5	Kg Melayu Sedenak	2	K Kabong	Pineapple farm	P01/Block 4			Smallholder	P02/Block 2			Smallholder	P01/Block 1	3	Basir Ismail	P98B/Block 1	Pulada Camp			P13/Block 1	Kg Air Putih	4	Ulu Tiram	P89/Block 1	FELDA Ulu Tebrau			P12/Block 1	Pelangi Indah Development	Yes
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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 is no dispute recorded and observed. Interview conducted with surrounding stakeholders confirmed that there is no land dispute had occurred.	Yes																																								
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	There is no dispute recorded and observed. Interview conducted with surrounding stakeholders confirmed that there is no land dispute had occurred.	Yes																																								

Criterion / Indicator		Assessment Findings	Compliance
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	There is no dispute recorded and observed. Interview conducted with surrounding stakeholders confirmed that there is no land dispute had occurred.	Yes
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	There is no dispute recorded and observed. Interview conducted with surrounding stakeholders confirmed that there is no land dispute had occurred.	Yes
Criterion 2.3:			
Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.			
2.3.1	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance -	Maps of appropriate scale showing extent of recognized legal rights was established within Sedenak complex.	Yes

Criterion / Indicator	Assessment Findings	Compliance
<p>2.3.2 Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include:</p> <ul style="list-style-type: none"> a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. <p>- Minor compliance -</p>	<p>Kulim has developed the procedure i.e. SOP on Negotiations Concerning Compensation Program dated 04/09/2007. There is no land dispute issue occurred since the last audit.</p>	<p>Yes</p>
<p>2.3.3 All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>-Minor compliance</p>	<p>There is no land disputed recorded and it has been confirmed during stakeholder interview.</p>	<p>Yes</p>
<p>2.3.4 Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel.</p> <p>-Major compliance</p>	<p>There is no land disputed recorded and it has been confirmed during stakeholder interview.</p>	<p>Yes</p>

Criterion / Indicator	Assessment Findings	Compliance	
Principle 3: Commitment to long-term economic and financial viability			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			
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 -	Annual business plan in the form of annual budget and the projection for 5 years (2020 – 2024) were prepared as guidance for future planning. In estate the business plan was include harvesting, vehicles, operation including medical expenses, upkeep and cultivation. Verified that the business plan contains FFB throughput, mill utilization rate, CPO, OER and KER, costs of production, and CAPEX.	Yes
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 -	In Sedenak estate, no replanting until 2022, the replanting will be started on 2023 with total hectarage 404.9 ha. For Ulu tiram estate, there are no replanting within this 5 years (2019 – 2024). The replanting will be started on 2036 at field P11 (29.98ha). Replanting programme was available for Basir Ismail, replanting programme 5 years from 2019 until 2024. Basir ismail will have replanting on 2021 with hectarage 322.31 ha. Replanting programme was available for Kuala Kabong, replanting programme 5 years from 2025 until 2030. Kuala Kabong will have replanting on 2026 with hectarage 218.54 ha at Field P99.	Yes
Principle 4: Use of appropriate best practices by growers and millers			
Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.			

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Criterion / Indicator		Assessment Findings	Compliance
4.1.1	Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	Sedenak Palm Mill uses its Mill Operation Manual that includes SOP, Work Instruction (19) and Sustainable Palm Oil Guidelines (13) as a guidance document to operate the mill. Estates use Kulim (M) Berhad Agricultural manual updated 1st July 2013 that covers land preparation, planting material, upkeep, harvesting and transport, etc. It also has implemented 28 OSH Safe Operating Procedures for Workshop, Stores (Chemical, General Waste, Schedule Waste, Fertiliser), Landfill site, Water Pump House, Cleaning Water Tank, Use of Fertiliser that contains Rock Phosphate and Crystalline Silica, Use of Grass Cutting/Trimming Hedges/Fogging Machine and other light machines, etc. The procedure was same asper previous years, no changes.	Yes
4.1.2	A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	Inspection at the field and mill confirm that the SOPs, Work Instructions and Guidelines are being implemented. Assistant Managers, Supervisors and Mandores at both mill and estates level carry out daily supervision monitoring the implementation as part of their duty and the following reports sighted are evidence of recording required. a) Daily / monthly production & financial report at both mill and estates. b) Daily and monthly lab analysis report at mill. Agronomist report 1/19 by Muhammad Shukri Rahman dated 11 March 2019. This report cover Pre nursery, Main Nursery, Culling and others activities. Other assessment to ensure consistent implementation of procedures was PI Visit (report ref: SS/LSDK/1/2019) dated 21 April 2019, from the report comment regarding to Ganoderma infection average infection was 4.74% however in field P01,P04A and P05 was high in infection need to conduct deboling to confine the infection. Same also in Basir Ismail, PI report (SS/LBI/3/2019) dated 23 Sept 2019.	Yes
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	All visited estates and the mill maintained all the above records including the administrative documents in either soft or hard copies in the office. They are maintained for a minimum of 10 years.	Yes

Criterion / Indicator		Assessment Findings	Compliance
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	Sedenak POM continued to maintain record of origins of all third party sourced Fresh Fruit Bunches (FFB). There are total 14 Traders and 8 Smallholders.	Yes
Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -	Good agriculture practices which follows the Kulim (M) Berhad Agriculture Manual dated July 2013 contains Standard Operating Procedures to ensure soil fertility is managed to a level that ensure optimal and sustained yield. The implementation of SOPs is checked during daily inspection by staff as well as by internal audits. The practices include among others the following; a) Soil survey and map including topography details b) Leaf sampling and nutrient analysis c) Fertilizer recommendation by the Agronomist d) Fertilizer application program/implementation e) Monthly/annual yield statistics analysis f) Roads, Drains, Bridges, Culvert and Fences g) Soil Conservation The recommendations for improvements are given through the Plantation Inspectorate and Agronomist reports. Records were sighted and verified. No changes during verification.	Yes

Criterion / Indicator		Assessment Findings	Compliance																																																		
4.2.2	Records of fertiliser inputs shall be maintained. - Minor compliance -	<p>Fertilizer recommendation is by Agronomist and records of application is captured via costing book and store issuance. Record details also show application date, field number, dosage applied per palm, type of fertilizer and number of applicators. All assessed estates maintained their fertiliser program and application records. Details of sampled field are as shown below; figures in kg otherwise stated and represent dosage /palm. Fertiliser input was available as per below:-</p> <table border="1"> <thead> <tr> <th rowspan="2">Field</th> <th colspan="4">Fertiliser type</th> <th rowspan="2">Date of Implementation</th> </tr> <tr> <th>AS</th> <th>MOP</th> <th>Mix 2+B</th> <th>GML</th> </tr> </thead> <tbody> <tr> <td>P00</td> <td>2.25</td> <td>1.75</td> <td>0</td> <td>0</td> <td>Jan 2019</td> </tr> <tr> <td>P05</td> <td>2.5</td> <td>1.25</td> <td>2.25</td> <td>2.00</td> <td>Feb 2019</td> </tr> <tr> <td>P06</td> <td>2.5</td> <td>1.25</td> <td>2.25</td> <td>0</td> <td>Feb 2019</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th rowspan="2">Field</th> <th colspan="4">Fertiliser type</th> <th rowspan="2">Date of Implementation</th> </tr> <tr> <th>AS</th> <th>MOP</th> <th>KIE</th> <th>HGFB</th> </tr> </thead> <tbody> <tr> <td>P09</td> <td>2.00</td> <td>1.5</td> <td>1.00</td> <td>0.10</td> <td>July</td> </tr> <tr> <td>P10</td> <td>2.10</td> <td>1.5</td> <td>1.00</td> <td>0.10</td> <td>Aug</td> </tr> </tbody> </table>	Field	Fertiliser type				Date of Implementation	AS	MOP	Mix 2+B	GML	P00	2.25	1.75	0	0	Jan 2019	P05	2.5	1.25	2.25	2.00	Feb 2019	P06	2.5	1.25	2.25	0	Feb 2019	Field	Fertiliser type				Date of Implementation	AS	MOP	KIE	HGFB	P09	2.00	1.5	1.00	0.10	July	P10	2.10	1.5	1.00	0.10	Aug	Yes
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Criterion / Indicator		Assessment Findings	Compliance																					
4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	<p>The internal Agronomist from Agronomy Advisory and Services Department visited estates to perform foliar and soil sampling as shown below. This is done to monitor changes in nutrient status prior to the fertilizer recommendation for the forthcoming year as below:</p> <p>Soil Sampling</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Report No</th> <th>Report Date</th> </tr> </thead> <tbody> <tr> <td>Sedenak estate</td> <td>SI/1908/0193-0196</td> <td>9/8/2019</td> </tr> <tr> <td>Ulu Tiram estate</td> <td>SI/1701/0001-0004</td> <td>23/1/2017</td> </tr> <tr> <td>Basir Ismail Estate</td> <td>SI/1904/0106-0109</td> <td>25/4/2019</td> </tr> </tbody> </table> <p>Foliar Sampling</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Report No</th> <th>Report date</th> </tr> </thead> <tbody> <tr> <td>Sedenak estate</td> <td>LI/1808/SDK/0975-0984</td> <td>29/8/2018</td> </tr> <tr> <td>Basir Ismail Estate</td> <td>LI/1904/BI/0490-0499</td> <td>24/4/2019</td> </tr> </tbody> </table>	Estate	Report No	Report Date	Sedenak estate	SI/1908/0193-0196	9/8/2019	Ulu Tiram estate	SI/1701/0001-0004	23/1/2017	Basir Ismail Estate	SI/1904/0106-0109	25/4/2019	Estate	Report No	Report date	Sedenak estate	LI/1808/SDK/0975-0984	29/8/2018	Basir Ismail Estate	LI/1904/BI/0490-0499	24/4/2019	Yes
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Sedenak estate	LI/1808/SDK/0975-0984	29/8/2018																						
Basir Ismail Estate	LI/1904/BI/0490-0499	24/4/2019																						
4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -	<p>The following practices are applied in the estates in relation to the nutrient recycling strategy;</p> <p>a) EFB application in designated fields at dosage of 30-50 mt/ha applied in inter rows subject to Agronomist recommendations</p> <p>b) Cut frond are stacked in between the palms rows left to decompose.</p> <p>c) Bio compost application in selected fields at rate of 7mt/ha</p> <p>d) POME Utilization using tractor tanker and furrow system at 17mt/ha or 125kg/palm at Sedenak Estate only, the host estate of Sedenak Mill. Todate August 2019 application POME was 80151 MT</p>	Yes																					
<p>Criterion 4.3: Practices minimise and control erosion and degradation of soils.</p>																								

Criterion / Indicator		Assessment Findings	Compliance
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	Within the Sedenak Certification Unit, fragile soils are only present at Kuala Kabong Estate. In terms of area, no peat soil in Sedenak estate, in sedenak estate there are 14 type soil and major type soil was Siri Bungor (10.24%), Siri Rengam(21.82%) and Siri Tai Tak (27.27%). Soil map was establish on 23 June 2019 by Semi Detailed Soil Map (DOA), 2012.	Yes
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 -	Management strategy for planting on slopes are referred to in Kulim (M) Berhad Agriculture Manual, Procedure A-07 Terrace and Platform Construction. Slope areas are constructed with terrace and stop bund. Planting terraces had been constructed where slope >7°. Fields are established with cover crops such as mucunna and planting of soft grasses in interlines to prevent soil erosion. In Sedenak estate, the slopes in estate flat area 9.55%, undulating (2-6 degree) 42.68% and undulating (6-12 degree) 47.31% and Hilly area was 0.46% as per Map dated 5 Aug 2018.	Yes
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	Road Maintenance programme was available in estate to ensure road in good condition, in Labis Bahru last road maintain done on Sept 2019 in field P01 (250.00 Ha), P04 (21.00 Ha) and P04A (155.00 Ha).	Yes

Criterion / Indicator	Assessment Findings	Compliance
<p>4.3.4</p> <p>Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place.</p> <p>- Minor compliance -</p>	<p>Kulim Plantations has established in its Agricultural Manual, Procedure A19 – Monitoring Subsidence of Peat Soils and this procedure had been implemented. There are 6 Subsidence Pole Points installed throughout the peat area. Readings are taken at 6monthly interval. Likewise, Procedure A18 – Water Management Plan in Peat Areas is used to provide extensive and effective drainage system in peat soil in order to maintain the water levels during dry period and to drain out the excess water during wet period.</p> <p>To conserve moisture, a series of weirs are constructed across the collection drains to hold back water and raise the water-table to within 50-75 cm from the surface. Water level monitoring pole is erected in the middle of the weir. Daily water level at each weir is recorded.</p> <p>The weirs sighted in the field are made of sandbags. To regulate the height of the water table, wooden planks/sandbags, acting as sluice gates, are slotted into the desired level. Except for periodic flushing of acidic water during the rainy seasons, the blocks are maintained at the predetermined level at all times.</p> <p>Assisted by the water gates (5 nos.) at the discharge ends of the main drains, the weirs are very effective in minimizing the adverse effects of the moisture stress.</p> <p>During verification sampling, Subsidence of peat soil monitoring at SPD 2 P02/03 been monitored by 4 month once, last monitoring record was on 25/9/2019. Water table been monitored at road no 3 at Field P00/04 dated 2 Oct 2019 and 4 Sept 2019.</p>	<p>Yes</p>
<p>4.3.5</p> <p>Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing.</p> <p>- Minor compliance -</p>	<p>See criterion 3.1.2 above. No replanting is envisaged in the next 5 years. Replanting will be start on 2026.</p>	<p>Yes</p>

Criterion / Indicator	Assessment Findings	Compliance
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 -	Kulim already establish manual for peat management as per Kulim Agriculture Manual Section A18 dated 1 July 2013. At Kuala Kabong Estate the Gajah Mati soil series in at undulating areas. The Management strategies adopted are Maximizing palm biomass retention/ recycling such as apply biocompost at 7MT/Ha and apply EFB at 30MT/Ha. Maintaining good non-competitive ground cover. Proper frond heap stacking such as contour/L-shaped stacking for straight line planting and also regular road maintenance.	Yes
Criterion 4.4: Practices maintain the quality and availability of surface and ground water.		

4.4.1	<p>An implemented water management plan shall be in place. - Minor compliance -</p>	<p>The mill water management plan has been established with the recent review made on 01/8/2019. Among others the plan therein has emphasized;</p> <ul style="list-style-type: none"> a) Rain water harvesting for cleaning purposes, b) Water from the reservoir for the mill operations c) Water from pond and treated for human consumption d) Continual training for workers on water efficiency consumption, e) Desilting of water reservoir to retain the reservoir optimal capacity. f) The action plan in event of draught/water pollution and <p>The estates similarly possessed the following water management plan. Among others containing the following initiatives.</p> <table border="1" data-bbox="981 783 1854 1337"> <thead> <tr> <th></th> <th>Source</th> <th>Activity</th> <th>Threat</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td><u>1</u></td> <td>Reservoir /pond/ SAJ/Rain</td> <td>Chemical mixing</td> <td>Pollution Draught Wastage</td> <td>Enforcement of buffer zone as non-spraying activities.</td> </tr> <tr> <td></td> <td></td> <td>Boiler - production of steam</td> <td>Water pollution</td> <td>Effluent analysis as required by DOE.</td> </tr> <tr> <td></td> <td></td> <td>General Upkeep</td> <td>Pollution Draught Wastage</td> <td>Follow WI & SOP to avoid water pollution. Follow SW SOP to avoid pollution caused from SW.</td> </tr> <tr> <td></td> <td></td> <td>Line site</td> <td>Pollution Draught Wastage</td> <td>Every house is supplied with containers. To schedule water supply to avoid wastage. Awareness on water usage efficiency.</td> </tr> </tbody> </table>		Source	Activity	Threat	Action Plan	<u>1</u>	Reservoir /pond/ SAJ/Rain	Chemical mixing	Pollution Draught Wastage	Enforcement of buffer zone as non-spraying activities.			Boiler - production of steam	Water pollution	Effluent analysis as required by DOE.			General Upkeep	Pollution Draught Wastage	Follow WI & SOP to avoid water pollution. Follow SW SOP to avoid pollution caused from SW.			Line site	Pollution Draught Wastage	Every house is supplied with containers. To schedule water supply to avoid wastage. Awareness on water usage efficiency.	Yes
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Criterion / Indicator		Assessment Findings				Compliance
					Outsource from neighboring estates.	
			Drain upkeep	Interrupti on water flow at drainage system.	Periodic desilting Building of sand bags at specific points to contain water (weirs)	
				Water pollution	Prohibit workers from activities at water source Drinking water analysis. Monitor condition of septic tank Adhere SW management procedure to avoid pollution caused by SW.	

<p>4.4.2</p>	<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. - Major compliance -</p>	<p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones has been verified at CU estates. Riparian buffer zones have been identified and demarcated. No chemicals and fertilizer application observed been used in their maintenance. In some areas Guatemala/vertivar grasses were grownd along the river banks. Guidelines of the width of the rivers and natural courses to be protected have been illustrated in the SOP revised dated 01/11/2018. The buffer zones established are as following:</p> <table border="1" data-bbox="1137 651 1700 887"> <thead> <tr> <th>No</th> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>>40 meters</td> <td>50 meters</td> </tr> <tr> <td>2</td> <td>20 - 40 meters</td> <td>40 meters</td> </tr> <tr> <td>3</td> <td>10 - 20 meters</td> <td>20 meters</td> </tr> <tr> <td>4</td> <td>5 - 10 meters</td> <td>10 meters</td> </tr> <tr> <td>5</td> <td>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>Buffer zones were protected. Areas visited for both the estates as tabled below;</p> <table border="1" data-bbox="1093 983 1749 1321"> <thead> <tr> <th>No</th> <th>Estates</th> <th>Location</th> <th>Field no</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Ulu Tiram</td> <td>Sg Tiram</td> <td>P86 Block 1</td> </tr> <tr> <td></td> <td></td> <td>Sg Tiram</td> <td>P12 Block 2</td> </tr> <tr> <td>2</td> <td>Sedenak</td> <td>Sg Skudai</td> <td>P01/Block 6</td> </tr> <tr> <td></td> <td></td> <td></td> <td>P06/Block 2</td> </tr> <tr> <td></td> <td></td> <td></td> <td>P01/Block 3</td> </tr> <tr> <td>3</td> <td>Basir Ismail</td> <td>Sg Redan</td> <td>P98B</td> </tr> <tr> <td></td> <td></td> <td></td> <td>P97/Block 3</td> </tr> <tr> <td>4</td> <td>K Kabong</td> <td>Natural stream</td> <td>P02/Block 4</td> </tr> <tr> <td></td> <td></td> <td>Natural stream</td> <td>P00/Block 2</td> </tr> </tbody> </table>	No	River width	Buffer zone	1	>40 meters	50 meters	2	20 - 40 meters	40 meters	3	10 - 20 meters	20 meters	4	5 - 10 meters	10 meters	5	< 5 meters	5 meters	No	Estates	Location	Field no	1	Ulu Tiram	Sg Tiram	P86 Block 1			Sg Tiram	P12 Block 2	2	Sedenak	Sg Skudai	P01/Block 6				P06/Block 2				P01/Block 3	3	Basir Ismail	Sg Redan	P98B				P97/Block 3	4	K Kabong	Natural stream	P02/Block 4			Natural stream	P00/Block 2	<p>Yes</p>
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Water samples from the intake point are taken for phosphate and nitrate analysis for detection of fertilizer application effect to the water courses. Extracted record of both the estates with details below;

No	<i>Ulu Tiram Estate 26/9/2019</i>		Points			
	Parameter	unit	Pt A	Pt B	Pt C	Pt D
1	Phosphate	mg PO4/L	0.32	0.48	0.47	-
2	Nitrate nitrogen	mg NO3N/L	0.36	0.63	0.46	-

No	<i>K Kabong Estate 20/9/19</i>		Points			
	Parameter	unit	Pt A	Pt B	Pt A	Pt B
1	Phosphate	mg PO4/L	3.61	2.18	1.68	0.88
2	Nitrate nitrogen	mg NO3N/L	0.04	0.04	0.04	2.90

No	<i>Basir Ismail Estate 19/9/19</i>		Points			
	Parameter	Unit	Sg Redan		Sg Serai	
			Pt A	Pt B	Pt A	Pt B
1	Phosphate	mg PO4/L	1.05	1.14	1.11	1.35
2	Nitrate nitrogen	mg NO3N/L	0.50	1.60	0.12	0.37

The limit for phosphate and nitrate is 0.2 ppm and 7 ppm respectively. *Basir Ismail and K Kabong Estates* recorded marginally higher phosphate level.

The management of BSE and KKE discussed the issue in the environmental meeting dated 21/8/19 and 03/9/19 respectively. Action taken on regular in the weekly monitoring of the HCV buffer zones areas. Records made in "Supervision On HCV /Buffer Zones." Records of both sighted Aug/Sept 2019. Among others management plan taken;

- a) Regular inspection at buffer/HCV areas
- b) Monitor water from surrounding areas
- c) Track, measure and report all activities around river
- d) Train and educate workers.

Similarly the mill takes samples from 2 points of Upstream and Downstream (*Sedenak Estate P04/Block 6 on a monthly basis. Results performance is shared with Sedenak Estate monitoring*). Results taken as shown below;

<i>Sedenak Mill 2019 upstream</i>						
Month		Parameters				
		BOD	COD	PH	SS	TS
1	Jan	21	30	6.4	44	160
2	Feb	17	47	7.5	40	156
3	Mac	7	8	7.7	92	104
4	April	19	56	7.6	8	32
5	May	<6	12	6.7	NA	344
6	June	<6	6	6.8	NA	136

<i>Sedenak Mill 2019 downstream</i>						
Month		Parameters				
		BOD	COD	PH	SS	TS
1	Jan	12	28	5.2	72	172
2	Feb	15	63	7.0	40	116
3	Mac	10	25	7.6	48	56
4	April	22	60	7.5	36	204

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Criterion / Indicator		Assessment Findings						Compliance																																																								
		5	May	<6	10	6.9	NA	300																																																								
		6	June	<6	<3	6.6	NA	176																																																								
		<p>Water for human consumption samples are taken six monthly recent being on 10/6/2019. Analysis includes the above for the upstream/downstream in addition the presence of metal content. All results conform to the specification.</p>																																																														
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Criterion / Indicator	Assessment Findings	Compliance																																				
4.4.3 Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -	<p>The effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No over flow was observed, and flow meter reading was recorded daily. The mill monitoring the effluent and submits to DOE through '<i>Borang Penyata Suku Tahunan</i>'. Sedenak Palm Mill DOE license 004532 was for land application and the requirement is for the BOD to be less than 100 mg/l. The results from final discharge were compliance within parameter limit. The Mill had made correspondence dated 29/8/19 with the DOE on the BOD level of 100 mg/l compliance. The mill expected to comply by 31/3/20. Record was sighted and verified.</p> <table border="1" data-bbox="1070 783 1767 1086"> <thead> <tr> <th>Sample date</th> <th>07/4/19</th> <th>05/5/19</th> <th>11/6/19</th> </tr> </thead> <tbody> <tr> <td>PH</td> <td>8.50</td> <td>8.40</td> <td>8.30</td> </tr> <tr> <td>BOD</td> <td>325</td> <td>196</td> <td>255</td> </tr> <tr> <td>COD</td> <td>3380</td> <td>1866</td> <td>3153</td> </tr> <tr> <td>Total solids</td> <td>10888</td> <td>9464</td> <td>1100</td> </tr> <tr> <td>Suspended solids</td> <td>1704</td> <td>1124</td> <td>1100</td> </tr> <tr> <td>Oil & grease</td> <td>11.00</td> <td>9.00</td> <td>9.00</td> </tr> <tr> <td>A Nitrogen</td> <td>-</td> <td>182</td> <td>196</td> </tr> <tr> <td>Total N</td> <td>-</td> <td>261</td> <td>291</td> </tr> </tbody> </table>	Sample date	07/4/19	05/5/19	11/6/19	PH	8.50	8.40	8.30	BOD	325	196	255	COD	3380	1866	3153	Total solids	10888	9464	1100	Suspended solids	1704	1124	1100	Oil & grease	11.00	9.00	9.00	A Nitrogen	-	182	196	Total N	-	261	291	<p>Yes</p>
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4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	<p>The mill processing water are obtained from the water catchment adjacent to the mill complex. The water usage monitoring is made monthly with the latest recording for to date 2019 is detailed below; target is ratio of 1.10.</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Water M3 Process & Domestic</th> <th>FFB processed/mt</th> <th>Water/FFB</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>64770</td> <td>38901</td> <td>1.66</td> </tr> <tr> <td>Feb</td> <td>53192</td> <td>30812</td> <td>1.73</td> </tr> <tr> <td>Mac</td> <td>60355</td> <td>35101</td> <td>1.72</td> </tr> <tr> <td>Apr</td> <td>38365</td> <td>14123</td> <td>2.72</td> </tr> <tr> <td>May</td> <td>49319</td> <td>21723</td> <td>2.27</td> </tr> <tr> <td>Jun</td> <td>44941</td> <td>27999</td> <td>1.61</td> </tr> <tr> <td>Jul</td> <td>60440</td> <td>38909</td> <td>1.55</td> </tr> <tr> <td>Aug</td> <td>71477</td> <td>37579</td> <td>1.90</td> </tr> <tr> <td>TOTAL</td> <td>442859</td> <td>245149</td> <td>1.81</td> </tr> </tbody> </table> <p>Variation is due to the following factors;</p> <ul style="list-style-type: none"> a) Production volume variance. b) Changes in the mill cleaning schedule. c) Mill machinery breakdown/pipe leakage. d) Weather condition i.e. rain fall 	Month	Water M3 Process & Domestic	FFB processed/mt	Water/FFB	Jan	64770	38901	1.66	Feb	53192	30812	1.73	Mac	60355	35101	1.72	Apr	38365	14123	2.72	May	49319	21723	2.27	Jun	44941	27999	1.61	Jul	60440	38909	1.55	Aug	71477	37579	1.90	TOTAL	442859	245149	1.81	Yes
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<p>Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.</p>																																											

Criterion / Indicator		Assessment Findings	Compliance
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	<p>All estates visited continued to have in place a documented integrated pest management (IPM) system. The IPM program among others included pest management of rats by rearing barn owls, bagworms by planting beneficial plants such as Cassia cobanensis, Antigonon leptopus and Turnera sublata as per Kulim (M) Berhad – ARM section J – IPM. The implementation was monitored for rat damage, bag worm attack, barn owl population census and records on planting beneficial plants.</p> <p>Latest implementation of IPM for Barn Owl Box census for occupancy dated 18 August 2019, in Ulu Tiram estate have 22 BOB with occupancy 54.5% cover 698.05 Ha. In Basir Ismail, have 42 BOB and 48% occupancy cover 1847.72 Ha.</p> <p>At Sedenak Estate, Antigonon, Tunera and Cassia were seen planted at Field P17 & P18. Tunera was also seen at P07/01/ P01/03 and P06/01. At Kuala Kabong Estate the following beneficial plants were sighted: Office areas Turnera Subulata, Allamanda and cathartica; Field P02/1 Turnera Subulata and Antigonon,; and Field P99/1,P99/2 & P99/3 Cassia cobanensis and Antigonon. At Ulu Tiram Estate Tunera was planted at field P12/01 along the main road.</p>	Yes
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	<p>Training for IPM was available in training need and plan for year 2019. The latest training was done on 25 April training on effective bagworm control by Plantation Advisory and Services Division. In Basir Ismail – 25 April 2019 by Agroomist Advisory And Services Department</p>	Yes
<p>Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment</p>			

Criterion / Indicator		Assessment Findings	Compliance															
4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance -	Justification of pesticides applied is available in the agriculture manual. Refer to agriculture manual 21/10/2015, H01: Justification of Chemical Use. The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimize effect on non-target spec.	Yes															
4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -	Records of pesticides and their active ingredients used, LD50, area treated, amount of a.i. applied per ha, and number of applications was maintained. Sample of Ai/Ha summary:- <table border="1" data-bbox="981 699 1868 954"> <thead> <tr> <th>Estate</th> <th>Hectarage</th> <th>AI/Ha</th> </tr> </thead> <tbody> <tr> <td>Sedenak estate</td> <td>2619.69</td> <td>0.107</td> </tr> <tr> <td>Ulu Tiram estate</td> <td>698.05</td> <td>0.13</td> </tr> <tr> <td>Basir Ismail estate</td> <td>2906.77</td> <td>0.14</td> </tr> <tr> <td>Kuala Kabong estate</td> <td>1622.70</td> <td>0.095</td> </tr> </tbody> </table>	Estate	Hectarage	AI/Ha	Sedenak estate	2619.69	0.107	Ulu Tiram estate	698.05	0.13	Basir Ismail estate	2906.77	0.14	Kuala Kabong estate	1622.70	0.095	Yes
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Sedenak estate	2619.69	0.107																
Ulu Tiram estate	698.05	0.13																
Basir Ismail estate	2906.77	0.14																
Kuala Kabong estate	1622.70	0.095																
4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Kulim's Agriculture Manual. The implementation in the field is consistent with the manual. There is no prophylactic use of pesticides.	Yes															

Criterion / Indicator	Assessment Findings	Compliance
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>Kulim (M) Bhd has stopped paraquat usage since February 2015. Alternatives such as Glyphosate were used. The implementation in the field is consistent with the SOP. No Changes from the previous audit. No record Pesticide class I in Ulu Tiram estate, Sedenak estate.</p> <p>Yes</p>

Criterion / Indicator		Assessment Findings	Compliance																			
4.6.5	<p>Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7).</p> <p>- Major compliance -</p>	<p>The suitable personal protective equipment's and application equipment provided to the operators. Pesticide operators given training on the safe handling and application of the pesticides. All precautions attached to the products explained using SDS to operators and understood by them. This was noted during the interview with workers. From the interview as per below verification training that been attended:-</p> <table border="1"> <thead> <tr> <th>Id Workers</th> <th>Training attended</th> <th>Date</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>601502</td> <td rowspan="4">Training on PPE,Chemical handling & Calibration done by En Haji Yaacob from G-Planter Sdn Bhd.</td> <td rowspan="4">14 April 2019 (Sprayer)</td> <td rowspan="4">Ulu Tiram</td> </tr> <tr> <td>601537</td> </tr> <tr> <td>601558</td> </tr> <tr> <td>601576</td> </tr> <tr> <td>603145</td> <td rowspan="5">Training in pesticide application by Jama' Sulaiman</td> <td rowspan="5">25 Sept 2019</td> <td rowspan="5">Basir Ismail</td> </tr> <tr> <td>603209</td> </tr> <tr> <td>603274</td> </tr> <tr> <td>603129</td> </tr> <tr> <td>603130</td> </tr> </tbody> </table>	Id Workers	Training attended	Date	Estate	601502	Training on PPE,Chemical handling & Calibration done by En Haji Yaacob from G-Planter Sdn Bhd.	14 April 2019 (Sprayer)	Ulu Tiram	601537	601558	601576	603145	Training in pesticide application by Jama' Sulaiman	25 Sept 2019	Basir Ismail	603209	603274	603129	603130	Yes
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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. SOP triple rinsing is available dated 18 May 2018 under Title Panduan Kerja Selamat Dibawah Akta Keselamatan Dan Kesihatan Pekerjaan 1994. Pesticide SOP 2nd Issue – Dec 2016 from SPO team ref no: SSD/ADMIN/002/17 under practice section stated All pesticide are to be kept in pesticide store.</p>	Yes																			

Criterion / Indicator	Assessment Findings	Compliance
4.6.7 Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Agriculture Manual, Section I: Weeds Management. The implementation in the field is consistent with the Agriculture Manual. The hazard already been assess in HIRARC and action plan was available. During interview in P13/01 with Spraying team, all PPE been used such as Apron, 3M respirator, Safety Shoes and Safety goggles, verified with PPE issuance dated 25 March 2019 (Id workers: 601594,601579 & 601591.)	Yes
4.6.8 Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	No aerial spraying at all estates.	Yes
4.6.9 Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	There is no associated smallholder at Sedenak Certification Unit. Employees handling pesticide given knowledge and skill required to cover safe handling practices and standard operating procedures.	Yes

Criterion / Indicator		Assessment Findings	Compliance																																		
4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -	<p>All empty chemical containers in both estates and mill were triple rinsed, and disposed through approved licensed contractor G-Planter Sdn Bhd. Kulim (Malaysia) Berhad adopted the guidelines provided by the Agriculture Department on the empty chemicals containers management. They record the quantity in store and disposal properly.</p> <p>The estate record as per below:-</p> <table border="1"> <thead> <tr> <th rowspan="2">Item</th> <th colspan="4">Quantity/pcs</th> </tr> <tr> <th>LSD</th> <th>LKK</th> <th>LBI</th> <th>LUT</th> </tr> </thead> <tbody> <tr> <td>Date</td> <td>19/9/19</td> <td>1/10/19</td> <td>28/6/19</td> <td>-</td> </tr> <tr> <td>1 20 L plastic pesticides containers</td> <td>173</td> <td>19</td> <td>190</td> <td>-</td> </tr> <tr> <td>2 4 L plastic pesticides containers</td> <td>118</td> <td>63</td> <td>181</td> <td>-</td> </tr> <tr> <td>3 Storm – Rat Bait Boxes</td> <td>-</td> <td>-</td> <td>278</td> <td>-</td> </tr> <tr> <td>4 Ally bottles</td> <td>81</td> <td>26</td> <td>53</td> <td>-</td> </tr> </tbody> </table>	Item	Quantity/pcs				LSD	LKK	LBI	LUT	Date	19/9/19	1/10/19	28/6/19	-	1 20 L plastic pesticides containers	173	19	190	-	2 4 L plastic pesticides containers	118	63	181	-	3 Storm – Rat Bait Boxes	-	-	278	-	4 Ally bottles	81	26	53	-	Yes
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Criterion / Indicator	Assessment Findings	Compliance
<p>4.6.11 Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -</p>	<p>The Specific annual medical surveillance for pesticide operators was documented and demonstrated. Sampling as per below detail:-</p> <p><u>Sedenak estate</u> The total of sprayer workers in Sedenak estate was 14 person. Medical surveillance been done on 11 July 2018 at Falck Bestari Clinic by Dr Saifurahman bin Abd Rahim(HQ/15/DOC/00/00412) with total 35 person, all fit to work with chemical. For this year, medical surveillance already been send dated 3 Julai 2019, Falck Bestari Clinic by Dr Saifurahman bin Abd Rahim(HQ/15/DOC/00/00412).</p> <p><u>Basir Ismail estate</u> Last Medical surveillance was send on 29 July 2018 at Klinik Falck Bestari report no. HQ/17/DOC/00/00053, attended by 60 people and all was fit to work with chemical. For year 2019 the management already sent workers for medical surveillance (65 person) on 14 July 2019 and report still pending at OHD Doctor.</p> <p><u>Kuala Kabong estate</u> Medical surveillance total attendance by 23 person was available for Kuala Kabong estate dated 4 July 2019 at Klinik Falck Bestari and the result still pending. Last year referred report HA/17/DOC/00/00053 by Kulim safety Training and Services Sdn Bhd. Attended by 12 person including sprayer, storekeeper and workshop.</p>	<p>Yes</p>

Criterion / Indicator		Assessment Findings	Compliance
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	No women worked as chemical handler in Sedenak Estate,Ulu Tiram Estate and Kuala Kabong Estate. Basir Ismail estate have no woman worker with pesticide however, from interview with them, they are aware on "No work with pesticides shall be undertaken by pregnant or breast-feeding women policy".	Yes
Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:			
4.7.1	A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. - Major compliance -	The established Occupational Safety & Health (OSH) Policy was sighted displayed at all Operating Unit offices visited. The policy was signed by the Executive Director of Kulim (Malaysia) Berhad on 1 May 2018. It is available in Bahasa Malaysia and English language. The health and safety plan documented and implemented, among others, include establishing OSH Committee and the functioning of the Committee; establishing of OSH objectives and monitoring of Safety Performance Scoreboard; all operations being risk assessed and control as per established SOP; establishing OSH Legal and Other Requirement Register and evaluation of its compliance; Chemical Health and Risk Assessment; Annual Audiometric test; Workplace accident notification, investigation and reporting; Posting of Protective Personal Equipment (PPE), Electrical Danger Signages and simplified SOP at work stations.	Yes

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Criterion / Indicator	Assessment Findings	Compliance
4.7.2	<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>Hazard Identification, Risk Assessment and Risk Control (HIRARC) procedure was followed as per Guidelines of HIRARC (JKKP DP 127/789/4.47) from DOSH dated 2008. At each Operating Unit visited, a HIRARC Register had been established. They were sighted kept up-to-date, reviewed annually by site team led by Assistant Manager and approved by the respective Operating Unit Manager.</p> <p>The operation have been assessed all risk in each activities under CHRA report, dated 17 April 2018 by Hjh Noormahani Harun refer report JKPP HQ/03/ASS/00/154 from QMSPRO Sdn Bhd. For HIRARC latest reviewed was on 14 August 2019.</p> <p>Audiometric test have been done on 19 May 2019 at Kulim Safety Training and Services Sdn Bhd attended by 33 person and found 7 hearing impairment and JKPP 7 send on 26 August 2019.</p>	Yes
4.7.3	<p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.</p> <p>- Minor compliance -</p> <p>Trainings were provided during musters and also in session held in the estate community hall/mill compound. The following trainings made for the employees were recorded as follows referred sampling in indicator 4.8.2. Subjects extracted were mainly related to ESH, SOPs, and pesticide handlings. No changes from the previous surveillance.</p>	Yes

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.4</p> <p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.</p> <p>- Major compliance -</p>	<p>Both the Estates / Mill Managers were appointed as the Chairman of the ESH committee. The letter of appointment for the Managers is signed by the Chairman ESH based at Head Office. The Manager subsequently assigned duties of ESH coordinator to the Assistants for the down line implementation of ESH practices in the estates. Similar appointment was made for all the estates and the mill. All identified Executives were officially given a letter for such an appointment. Both estates and the mill management conduct regular two-way communication with their employees through the quarterly ESH meeting. As per date 29/3/2019, 27/6/2019, 18/9/2019 OSH meeting been recorded in Sedenak POM.</p> <p>For Sedenak estate, 24 Sept 2019,25 June 2019, 25 March 2019 OSH Meeting. OSH appointment letter for manager can refer letter dated 4 September 2016. Latest appointment letter dated 4 Jan 2019</p> <p>In Ulu Tiram estate already done OSH meeting done periodically, latest was done on 19 September 2019 and previously was on 17 May 2019. Workplace inspection done before the OSH meeting. Appointment letter – 8 March 2017. For new assistant En Mohd Syawal appointment letter dated 9 Sept 2019.</p>	<p>Yes</p>

Criterion / Indicator	Assessment Findings	Compliance	
<p>4.7.5</p>	<p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Accident and emergency procedures have been established and communicated to employees, contractors and visitors. Interviews with employees showed that they know who to contact during emergency. Emergency contact number were seen available at notice board of offices visited and also made known to employees at the POM and those working in the field. Records of First Aid training was sighted. Trained First Aiders at mill were Electrical Chargeman, Supervisors and workstation Leads and at the estates were Mandores.</p> <p>Records of all accidents were kept and discussed during the 3monthlly Safety & Health Committee meeting. All accidents are reported to DOSH as per NADOPOD Regulation 2004. Sampling as per below:-</p> <p><u>Sedenak Mill</u> JKPP 8/25641/2018 – 3 accident happen last year. (29/1/2018,3/6/218 dan 15/8/2018) no JKPP 6 on 2018 and 2019.</p> <p><u>Ulu tiram estate</u> JKPP 8/26006/2018 – 1 Accident happen, accident during going home from work. Dated send to DOSH on 15 Jan 2019. No accident happen in estate for this year.</p> <p><u>Basir Ismail</u> JKPP 8/35044/2019 – 10 accident happen last year - 3 record(JKPP 8) dated 11/11/2018 (2 cases) and 25/12/2018.</p>	<p>Yes</p>

Criterion / Indicator		Assessment Findings						Compliance																								
4.7.6	All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -	<p>All workers provided with medical care, and covered by accident insurance.</p> <p>Sample insurance policies checked:</p> <table border="1"> <thead> <tr> <th>Insurance</th> <th>Period</th> <th>Mill/estate</th> <th colspan="3">Remarks</th> </tr> </thead> <tbody> <tr> <td>SOCISO</td> <td>August 2019</td> <td>Sedenak POM</td> <td colspan="3">ID No: Malaysian: 615234,615201,6 15055 & 951660 Foreigner: 615611, 615612,615545 & 615543</td> </tr> <tr> <td>FWCS (Berjaya SOMPO Insurance Berhad)</td> <td>1/11/2018 – 30/4/2020</td> <td>Sedenak estate</td> <td colspan="3">ID No: 615382,615156, 615352,615282, 615177</td> </tr> <tr> <td>SOCISO</td> <td>August 2019</td> <td>Basir Ismail Estate</td> <td colspan="3">ID No: 603294, 602031, 602049, 602925, 602648, 603214</td> </tr> </tbody> </table>						Insurance	Period	Mill/estate	Remarks			SOCISO	August 2019	Sedenak POM	ID No: Malaysian: 615234,615201,6 15055 & 951660 Foreigner: 615611, 615612,615545 & 615543			FWCS (Berjaya SOMPO Insurance Berhad)	1/11/2018 – 30/4/2020	Sedenak estate	ID No: 615382,615156, 615352,615282, 615177			SOCISO	August 2019	Basir Ismail Estate	ID No: 603294, 602031, 602049, 602925, 602648, 603214			Yes
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4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	<p>Records of incident and accident are available, using internal reporting. All records on Lost Time Accident (LTA) metrics are updated and maintained accordingly as per below:-</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Sedenak Mill</th> <th>Sedenak estate</th> <th>Ulu Tiram estate</th> <th>Basir Ismail estate</th> <th>Kuala Kabong estate.</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>22.99</td> <td>10.39</td> <td>6.76</td> <td>30.30</td> <td>82.76</td> </tr> </tbody> </table>						Year	Sedenak Mill	Sedenak estate	Ulu Tiram estate	Basir Ismail estate	Kuala Kabong estate.	2018	22.99	10.39	6.76	30.30	82.76	Yes												
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<p>Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.</p>																																

Criterion / Indicator	Assessment Findings	Compliance
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 -	Sighted an approved Training Scheduled for 2019 was established. Awareness and training programme had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding SDS, all SOPs', safe working practices, the correct use of PPE, all aspects of the RSPO and etc.
		Yes

Criterion / Indicator		Assessment Findings	Compliance																																								
4.8.2	Records of training for each employee shall be maintained. - Minor compliance -	<p>Training records for employees available and maintained at the office. Records are verified on a sampling basis which covers all aspect of training and RSPO P&C requirement. Samples of training record for 2019 as follows:</p> <table border="1"> <thead> <tr> <th>Training Type</th> <th>Date of Training</th> <th>Venue</th> </tr> </thead> <tbody> <tr> <td>Manuring training</td> <td>9/7/2019</td> <td rowspan="6">Sedenak estate</td> </tr> <tr> <td>Harvesting training</td> <td>7/3/2019</td> </tr> <tr> <td>Waste Cleaning and landfill</td> <td>12/2/2019</td> </tr> <tr> <td>Spraying training</td> <td>29/5/2019</td> </tr> <tr> <td>Triple rinsing training</td> <td>18/3/2019</td> </tr> <tr> <td>Rat Baiting training</td> <td>7/1/2019</td> </tr> <tr> <td>RSPO training</td> <td>27/7/2019 & 29/9/2019</td> <td rowspan="5">Ulu Tiram estate</td> </tr> <tr> <td>Zero burning training</td> <td>20/9/2019</td> </tr> <tr> <td>ERP training</td> <td>14-16/7/2019</td> </tr> <tr> <td>RSPO training for Contractor</td> <td>29/9/2019</td> </tr> <tr> <td>Triple rinsing training</td> <td>15/9/2019</td> </tr> <tr> <td>Scheduled waste training</td> <td>9/5/2019</td> <td rowspan="6">Basir Ismail</td> </tr> <tr> <td>Water sampling training</td> <td>15/8/2019</td> </tr> <tr> <td>Fertilizer Handling</td> <td>22/7/2019</td> </tr> <tr> <td>Fogging Training</td> <td>12/8/2019</td> </tr> <tr> <td>Fire Drill and Fire Fighting</td> <td>4/10/2019</td> </tr> <tr> <td>First Aid</td> <td>7/9/2019</td> </tr> </tbody> </table>	Training Type	Date of Training	Venue	Manuring training	9/7/2019	Sedenak estate	Harvesting training	7/3/2019	Waste Cleaning and landfill	12/2/2019	Spraying training	29/5/2019	Triple rinsing training	18/3/2019	Rat Baiting training	7/1/2019	RSPO training	27/7/2019 & 29/9/2019	Ulu Tiram estate	Zero burning training	20/9/2019	ERP training	14-16/7/2019	RSPO training for Contractor	29/9/2019	Triple rinsing training	15/9/2019	Scheduled waste training	9/5/2019	Basir Ismail	Water sampling training	15/8/2019	Fertilizer Handling	22/7/2019	Fogging Training	12/8/2019	Fire Drill and Fire Fighting	4/10/2019	First Aid	7/9/2019	Yes
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Principle 5: Environmental responsibility and conservation of natural resources and biodiversity

Criterion 5.1:

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

<p>5.1.1</p>	<p>An environmental impact assessment (EIA) shall be documented. - Major compliance -</p>	<p>Kulim (Malaysia) Berhad have conducted the annual Environmental Risk Assessment.</p> <ul style="list-style-type: none"> a) The last review was dated July 2019. The Environmental Risk Assessment was conducted by Kulim SPO team and operating units (e.g. mill & estate). b) The Environmental Risk Assessment is annually reviewed and accepted to conclude that proper environmental management has been considered prior any activities. c) As per the EQA 1974, there is no EIA required as there is no expansion of mill activities or expansion of new land planting. <p>The EAI as detailed in the estates register covers all estates activities/operations. Among others the significant environmental aspects related to the estates operation including the activities from;</p> <table border="1" data-bbox="1048 847 1794 1150"> <thead> <tr> <th>No</th> <th>Activities</th> <th>No</th> <th>Activities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Community</td> <td>8</td> <td>Road maintenance</td> </tr> <tr> <td>2</td> <td>Harvesting & collection</td> <td>9</td> <td>Use of chemicals</td> </tr> <tr> <td>3</td> <td>Fertilizer application</td> <td>10</td> <td>Use of hydrocarbons</td> </tr> <tr> <td>4</td> <td>Machine operations</td> <td>11</td> <td>Dispensary</td> </tr> <tr> <td>5</td> <td>Pest and Disease</td> <td>12</td> <td>Scheduled waste</td> </tr> <tr> <td>6</td> <td>Replanting</td> <td>13</td> <td>Storage / office</td> </tr> <tr> <td>7</td> <td>Vehicle maintenance</td> <td>14</td> <td>Water treatment plant</td> </tr> </tbody> </table> <p>Similarly, the environmental aspects for the mill are tabulated in the EAI master list Risk Assessment (RA) Register updated on July 2019. Among others the EAI's are divided into the all stations in the mill processing as listed below. The newest added activities being the MDS and ETP (additional dust cyclone being installed). Documents are maintained, sighted and verified as below:</p>	No	Activities	No	Activities	1	Community	8	Road maintenance	2	Harvesting & collection	9	Use of chemicals	3	Fertilizer application	10	Use of hydrocarbons	4	Machine operations	11	Dispensary	5	Pest and Disease	12	Scheduled waste	6	Replanting	13	Storage / office	7	Vehicle maintenance	14	Water treatment plant	<p>Yes</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> a) The boiler stack emission, black smoke b) Palm oil mill effluent (POME) discharge and water contamination, c) Activities related to managing of scheduled wastes and general waste. d) Activities of all operations beginning from the mill entrance ending to the effluent, EFB operations. e) Activities relating to construction i.e. building repair and new construction 	
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>All the estates and the mill maintained its documented environmental impact assessment.</p> <ul style="list-style-type: none"> a) The information of environmental impact assessment contained in the Environmental Aspect Identification (EAI) and Environmental Impact Evaluation Risk Assessment Register (RA) register. b) The documents included the identification and evaluation of environmental aspects covering mill and plantation operation, including replanting. No replanting was observed c) Relevant environmental aspects and impacts (particularly potential soil erosion from land clearing) were identified and mitigated (planting LCC to prevent erosion). d) Sedenak Palm Oil Mill developed documents relating to <ul style="list-style-type: none"> - Pollution & Emission Management Plan dated 01/4/2019. This was sighted i.e. permissible black smoke emission and to ensure final effluent discharge within the stipulated limit has been developed. <p>All the Estates/Mill Executives has been assigned to ensure the action plan are effectively implemented within the stipulate time frame. They were assisted by the respective supervisors/staff.</p>

<p>5.1.3</p>	<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. - Minor compliance -</p>	<p>The mitigation measures to manage the significant environmental impact were defined in the following documents a) Mill – Pollution & Emission Plan dated 01/4/19 b) Estate – Pollution & Emission Plan endorsed on 01/8/19</p> <p>Details as provided therein among others as given below;</p> <table border="1" data-bbox="1070 587 1771 1157"> <thead> <tr> <th colspan="4">Sedenak Palm Oil Mill</th> </tr> <tr> <th>No</th> <th>Emission</th> <th>Source</th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td rowspan="2">1</td> <td rowspan="2">Dark smoke</td> <td>Mill stack – boiler</td> <td>As required</td> </tr> <tr> <td>Running vehicles</td> <td>Daily</td> </tr> <tr> <td>2</td> <td>Noise</td> <td>Diesel engines</td> <td>Operational hours</td> </tr> <tr> <td rowspan="2">3</td> <td rowspan="2">Dust particles</td> <td>Shredded EFB</td> <td>Operational hours</td> </tr> <tr> <td>Boiler ashes</td> <td>Operational hours</td> </tr> <tr> <td rowspan="3">4</td> <td rowspan="3">Air pollutant</td> <td>Boiler combustion</td> <td>As required</td> </tr> <tr> <td>Diesel engine</td> <td>As required</td> </tr> <tr> <td>Running vehicles</td> <td>Daily</td> </tr> <tr> <td>5</td> <td>POME</td> <td>Mill process</td> <td>Daily</td> </tr> <tr> <td rowspan="2">6</td> <td rowspan="2">Waste Water</td> <td>PCD</td> <td>As required</td> </tr> <tr> <td>Septic tank spillage</td> <td>Weekly inspection</td> </tr> </tbody> </table> <table border="1" data-bbox="1070 1189 1771 1348"> <thead> <tr> <th>No</th> <th>Emission</th> <th>Action Plan</th> <th>PIC</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Dark smoke</td> <td>Follow manual procedure to ensure compliance meets permissible limits</td> <td>Execs/Boiler man</td> </tr> </tbody> </table>	Sedenak Palm Oil Mill				No	Emission	Source	Frequency	1	Dark smoke	Mill stack – boiler	As required	Running vehicles	Daily	2	Noise	Diesel engines	Operational hours	3	Dust particles	Shredded EFB	Operational hours	Boiler ashes	Operational hours	4	Air pollutant	Boiler combustion	As required	Diesel engine	As required	Running vehicles	Daily	5	POME	Mill process	Daily	6	Waste Water	PCD	As required	Septic tank spillage	Weekly inspection	No	Emission	Action Plan	PIC	1	Dark smoke	Follow manual procedure to ensure compliance meets permissible limits	Execs/Boiler man	<p>Yes</p>
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				Vehicle inspection	Exec/supervisors																
		2	Noise	Noise mapping data	Exec/supervisors																
		3	Dust particles	Routine maintenance	Exec/supervisors																
				Storage far from water source	Exec/supervisors																
		4	Air pollutant	Conduct stack monitoring	Exec/supervisors																
				Routine maintenance	Exec/supervisors																
				Inspection & maintenance of vehicle.	Exec/supervisors																
		5	POME	Supervise management of effluent application.	Exec/supervisors																
		6	Waste Water	Regular PCD inspection. Follow SW guidelines.	Execs/Staff/foreman																
				Conduct weekly line site inspection. Appropriate action in event of spillages.	Execs/Staff/EHA																
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			Septic tank spillage		Weekly inspection
No	Emission	Action Plan		PIC	
1	Dark smoke	Inspection of vehicle condition		Exec/staff	
2	Noise	Scheduled maintenance		Exec/staff	
		Inspection of vehicle inspection		Exec/staff	
3	Air pollution	Routine maintenance as schedule		Exec/staff	
		Inspection of vehicle condition		Exec/staff	
4	Waste water	Inspection of PCD for functional		Exec/staff/foreman	
		Adherence to SW guidelines			
		Weekly line site inspection			
		Appropriate action on spillage			

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Criterion / Indicator	Assessment Findings	Compliance
	Records of periodical reporting of each of the above items were evident to support that the plans have been monitored. The plans were reviewed annually.	
<p>Criterion 5.2: The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and and operations managed to best ensure that they are maintained and/or enhanced.</p>		

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). - Major compliance -</p>	<p>The latest assessment conducted was in January 2008 for Sedenak Complex Supply Base Estates respectively. The assessment was conducted by <i>A.J.F.M Dekker</i>. Exception for Ulu Tiram Estate for which the assessment was reviewed in August 2016 by <i>M/s Malaysian Environmental Consultant Sdn Bhd</i>. Both the assessments were made in relation to the Rapid Biodiversity Assessment. Both the reports have identified the list of natural habitats that is possible present in the operating units. The reports detail the findings of a rapid appraisal of the biodiversity in the estates and address the RSPO P&C relevant to biodiversity conservation and HCV.</p> <p>Therein being provided details relating to the following;</p> <ul style="list-style-type: none"> a) General biodiversity issues b) Watercourses and drainage c) Habitats natural and man-made d) Wildlife e) Ponds and reservoirs f) Wetlands /watercourses g) Legal aspects h) Immediate and long term effect. <p>In all the estates within the <i>Sedenak Complex Supply Base</i> there is no HCV habitat within and outside the estates with the exception of mangroves areas in <i>Basir Ismail</i>. There was no primary forest habitats present at any of the estates. There is also no wildlife neither reported nor observed by the employees. The estates within contains pockets of semi-natural vegetation. Other observation as recorded below;</p> <table border="1" data-bbox="981 1235 1836 1366"> <thead> <tr> <th rowspan="2">No</th> <th rowspan="2">Estate</th> <th colspan="2">Natural habitat</th> <th rowspan="2">Water bodies</th> </tr> <tr> <th>Within</th> <th>At boundary</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Sedenak</td> <td>-</td> <td>Degraded secondary forest</td> <td>1 wetland 2 ponds</td> </tr> </tbody> </table>	No	Estate	Natural habitat		Water bodies	Within	At boundary	1	Sedenak	-	Degraded secondary forest	1 wetland 2 ponds	Yes
No	Estate	Natural habitat			Water bodies										
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		2	Basir Ismail	Tidal mangrove forest on Pulau Tanjung Lena	Tidal mangrove, 2ndary level halfway to becoming dry forest	4 ponds	
		3	Kuala Kabong	-	Degraded swamp forest, wetland fringe along main drain	1 wetland 2 ponds	
		4	Ulu Tiram	Ex- coffee plantation area growth with plant species.	All boundaries are located with area earmarked or in progress of development	1 river 1 lake	
		No	Estate	Wildlife species			
				Within	At boundary		
		1	Sedenak	Black shouldered kite, crested serpent eagle, purple heron, kingfishers, red wattled lapwing	Storks, long tailed macaque		
		2	Basir Ismail	Purple heron, crested serpent eagle, kingfishers	Grey headed fish eagle, white bellied sea eagle, long tailed macaque, silvered leaf monkey		
		3	Kuala Kabong	Purple heron, kingfishers, common kingfisher, red wattled lapwing, dollar bird.	Weaver nests, long tailed macaque		

Criterion / Indicator		Assessment Findings			Compliance	
		4	Ulu Tiram	Yellow vented bulbul, purple heron & oriental magpie robin.	Carnivorous reptiles at borders of coffee area.	
5.2.2	Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan. - Major compliance -	There is no RTE found the entire Sedenak CU Complex as recorded. The management however maintained the following practices;				Yes
				a) Records of sighting if any are recorded and forwarded to the management SQD e.g. wild boars, monkeys and squirrels among others.		
				b) The management conducted a regular patrol of HCV areas, access and boundary of estates. Signage, such as "No Hunting", "No Fishing", "Buffer Zone" was available.		
				c) No use of chemicals observed been applied in the buffer zone as prohibited.		

<p>5.2.3</p>	<p>There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. - Minor compliance -</p>	<p>The Biodiversity Improvement Plan dated 01/08/2019 had identified the plan. Among others consists of the following;</p> <ul style="list-style-type: none"> a) To continue educating the workers regarding RTE. Workers interviewed confirmed that they are aware of no hunting is permitted in and within the estate. b) Regular educating the employees via morning muster briefing about the need to protect the RTE species. c) Appropriate disciplinary measures will be taken if found violated. d) Information pertaining RTE and relevant CU policies were displayed at the display boards. e) Buffer zone establishment to map areas and install buffer zone pegs. f) Encroachment control in HCV area and monitoring g) Stabilize the slope at the pump house near the river. <p>Training in relation to the RTE/HCV management for the estates as shown below;</p> <table border="1" data-bbox="981 943 1796 1114"> <thead> <tr> <th colspan="4"><i>Ulu Tiram Estate</i></th> </tr> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>17/5/19</td> <td>Biodiversity & IPM management</td> <td>Entire</td> </tr> <tr> <td>2</td> <td>24/7/19</td> <td>Aspect /Impact – EIA management plan</td> <td>Entire</td> </tr> <tr> <td>3</td> <td>29/9/19</td> <td>Environmental Policy & Guidelines</td> <td>Entire</td> </tr> </tbody> </table> <table border="1" data-bbox="981 1145 1796 1378"> <thead> <tr> <th colspan="4"><i>Basir Ismail Estate</i></th> </tr> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>29/4/19</td> <td>Biodiversity & IPM management</td> <td>Entire</td> </tr> <tr> <td>2</td> <td>28/7/19</td> <td>Fertilizer application and at buffer zone area</td> <td>Entire</td> </tr> <tr> <td>3</td> <td>15/8/19</td> <td>Water sampling</td> <td>2</td> </tr> <tr> <td>4</td> <td>7/3/19</td> <td>Environmental Policy & Guidelines SW</td> <td>Entire</td> </tr> </tbody> </table>	<i>Ulu Tiram Estate</i>					Date	Subject	Attendees	1	17/5/19	Biodiversity & IPM management	Entire	2	24/7/19	Aspect /Impact – EIA management plan	Entire	3	29/9/19	Environmental Policy & Guidelines	Entire	<i>Basir Ismail Estate</i>					Date	Subject	Attendees	1	29/4/19	Biodiversity & IPM management	Entire	2	28/7/19	Fertilizer application and at buffer zone area	Entire	3	15/8/19	Water sampling	2	4	7/3/19	Environmental Policy & Guidelines SW	Entire	<p>Yes</p>
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Criterion / Indicator		Assessment Findings				Compliance	
		5	8/7/19	Zero burning Guidelines	Entire		
		6	10/2/19	HCV/Biodiversity – weeding	Entire		
		7	28/7/19	RTE protection /penalty	Entire		
.							
<i>Kuala Kabong Estate</i>							
			Date	Subject	Attendees		
		1	1/10/19	Biodiversity & IPM management	11		
		2	28/1/19	Fertilizer application and at buffer zone area	10		
		3	5/8/19	Water sampling /management	3		
		4	20/9/19	Environmental Policy & Guidelines SW	Entire		
		5	01/2/19	Zero burning Guidelines	Entire		
		6	4/4/19	HCV/Biodiversity – weeding	Entire		
		7	3/3/19	RTE protection /penalty	Entire		
		8	22/8/19	Domestic waste /Landfill management	Entire		
.							
<i>Sedenak Estate</i>							
			Date	Subject	Attendees		
		1	12/6/19	Biodiversity & IPM management	Entire		
		2	12/2/19	Aspect /Impact – EIA management plan	9		
		3	5/3/19	Environmental Policy & Guidelines SW	6		
		4	12/4/19	Zero burning Guidelines	Entire		
		5	12/3/19	HCV/Biodiversity – weeding	14		
		6	17/6/19	RTE protection /penalty	Entire		
.							

Criterion / Indicator	Assessment Findings	Compliance
5.2.4 Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance -	The plan is described and incorporated in the Biodiversity Improvement Plan dated 01/8/2019. <ul style="list-style-type: none"> a) Animal sighting records. Records being updated monthly in a form 'Record Of Animal Sightings' with also a copy submitted to SQD. b) There are no RTE identified in the sighting records. c) Buffer zone signage acts as continuous awareness to workers. d) Training being provided to employees. reference 4.7.3 There is annual meeting held at HQ annually by the HCV management committee. Among others discussion covers the following agenda; <ul style="list-style-type: none"> a) Introduction b) Objectives and function c) HCV / Human elephant conflict – HEC d) New planting procedure (currently there is no new planting or near future) 	Yes
5.2.5 Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	There are no HCV set-asides for local communities identified in all the estates.	Yes
Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.		

<p>5.3.1</p>	<p>All waste products and sources of pollution shall be identified and documented. - Major compliance -</p>	<p>The waste and pollution are identified and documented in the Waste & Pollution Management Plan 2019 made on the Regional level. The management plan was last reviewed on 01/8/19. Details of waste generated from the estates/mill activities among others as shown below;</p> <table border="1" data-bbox="981 491 1836 1058"> <thead> <tr> <th>No</th> <th colspan="2">Mill/Estates</th> </tr> <tr> <th></th> <th>Type of waste</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Domestic waste rubbish</td> <td>Line sites, office complex</td> </tr> <tr> <td>2</td> <td>Industrial waste-fertilizer bags</td> <td>Empty bags store</td> </tr> <tr> <td>3</td> <td>Scrap metal</td> <td>workshop</td> </tr> <tr> <td>4</td> <td>SW 404 Clinical waste</td> <td>clinic</td> </tr> <tr> <td>5</td> <td>SW rags, plastics, filters</td> <td>workshop</td> </tr> <tr> <td>6</td> <td>Spent lubricant & hydraulic oil</td> <td>workshop</td> </tr> <tr> <td>7</td> <td>Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW,</td> <td>Scheduled waste store</td> </tr> <tr> <td>8</td> <td>Sewage waste</td> <td>Workers /staff toilets & office</td> </tr> <tr> <td></td> <td>EFB/Fibre/shell/boiler ash</td> <td>EFB applied in field, fibre in bio-compost production. Shell being sold externally Ash stored far from water course.</td> </tr> </tbody> </table> <p>The pollution identified from <i>Sedenak Mill</i> activities as follows;</p> <table border="1" data-bbox="981 1121 1836 1390"> <thead> <tr> <th>No</th> <th>Emission</th> <th>Source</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Dark smoke</td> <td>Mill stack – boiler /running engines</td> </tr> <tr> <td>2</td> <td>Noise</td> <td>Diesel engines</td> </tr> <tr> <td>3</td> <td>Dust particles</td> <td>Shredded EFB Boiler ashes</td> </tr> <tr> <td>4</td> <td>Air pollutant</td> <td>Boiler combustion Diesel engine / running vehicles</td> </tr> <tr> <td>5</td> <td>POME</td> <td>Mill process / ETP</td> </tr> </tbody> </table>	No	Mill/Estates			Type of waste	Location	1	Domestic waste rubbish	Line sites, office complex	2	Industrial waste-fertilizer bags	Empty bags store	3	Scrap metal	workshop	4	SW 404 Clinical waste	clinic	5	SW rags, plastics, filters	workshop	6	Spent lubricant & hydraulic oil	workshop	7	Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW,	Scheduled waste store	8	Sewage waste	Workers /staff toilets & office		EFB/Fibre/shell/boiler ash	EFB applied in field, fibre in bio-compost production. Shell being sold externally Ash stored far from water course.	No	Emission	Source	1	Dark smoke	Mill stack – boiler /running engines	2	Noise	Diesel engines	3	Dust particles	Shredded EFB Boiler ashes	4	Air pollutant	Boiler combustion Diesel engine / running vehicles	5	POME	Mill process / ETP	<p>Yes</p>
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Criterion / Indicator		Assessment Findings		Compliance	
		6	Waste Water	PCD7	
				Septic tank spillage	
		The pollution from the estates activities as illustrated below;			
		1	Dark smoke	Running vehicles	
		2	Noise	Diesel engine	
				Running vehicles	
		3	Air pollution	Diesel engine	
				Running vehicles	
		4	Waste water	PCD	
				Septic tank spillage	
		5	Leakage of pesticides	Activities during chemical mixing and transportation	
		6	Lubricant spillage	Maintenance work at the workshop for estates vehicles	
		7	POME	Spillages during application / pipe leakages	

<p>5.3.2</p>	<p>All chemicals and their containers shall be disposed of responsibly. - Major compliance -</p>	<p>Kulim (Malaysia) Berhad adopted the guidelines provided by the Agriculture Department on the empty chemicals containers management. All empty chemical containers in both estates and mill were triple rinsed, and disposed through approved licensed contractor <i>G-Planter Sdn Bhd</i>. The DOE licensed contractor <i>Kualiti Alam Sdn Bhd</i> caters the collection of scheduled wastes for both mill and estates within Sedenak and Supply Base Complex. Sighted record of disposal made as follows by the estates/mill;</p> <table border="1" data-bbox="1016 619 1823 960"> <thead> <tr> <th colspan="2">Item</th> <th colspan="4">Quantity/pcs</th> </tr> <tr> <th colspan="2"></th> <th>LSD</th> <th>LKK</th> <th>LBI</th> <th>LUT</th> </tr> </thead> <tbody> <tr> <td></td> <td>Date</td> <td>19/9/19</td> <td>1/10/19</td> <td>28/6/19</td> <td>-</td> </tr> <tr> <td>1</td> <td>20 L plastic pesticides containers</td> <td>173</td> <td>19</td> <td>190</td> <td>-</td> </tr> <tr> <td>2</td> <td>4 L plastic pesticides containers</td> <td>118</td> <td>63</td> <td>181</td> <td>-</td> </tr> <tr> <td>3</td> <td>Storm – Rat Bait Boxes</td> <td>-</td> <td>-</td> <td>278</td> <td>-</td> </tr> <tr> <td>4</td> <td>Ally bottles</td> <td>81</td> <td>26</td> <td>53</td> <td>-</td> </tr> </tbody> </table> <table border="1" data-bbox="1016 992 1823 1375"> <thead> <tr> <th colspan="2">Item</th> <th colspan="5">Quantity/mt</th> </tr> <tr> <th colspan="2"></th> <th>LSD</th> <th>LUT</th> <th>LKK</th> <th>LBI</th> <th>SPOM</th> </tr> </thead> <tbody> <tr> <td></td> <td>Date</td> <td>19/9/19</td> <td>30/9/19</td> <td>21/9/19</td> <td>29/9/19</td> <td>19/9/2019</td> </tr> <tr> <td>1</td> <td>SW109</td> <td>-</td> <td>0.012</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>2</td> <td>SW110</td> <td>-</td> <td>0.440</td> <td>-</td> <td>-</td> <td>0.150</td> </tr> <tr> <td>3</td> <td>SW305</td> <td>0.522</td> <td>0.200</td> <td>0.250</td> <td>0.0280</td> <td>4.200</td> </tr> <tr> <td>4</td> <td>SW307</td> <td>0.209</td> <td></td> <td>0.450</td> <td>0.009</td> <td>-</td> </tr> <tr> <td>5</td> <td>SW408</td> <td>0.015</td> <td></td> <td>-</td> <td>0.011</td> <td>-</td> </tr> <tr> <td>6</td> <td>SW409</td> <td>-</td> <td>0.022</td> <td>-</td> <td>-</td> <td>0.120</td> </tr> <tr> <td>7</td> <td>SW410</td> <td>0.035</td> <td>0.250</td> <td>0.005</td> <td>0.009</td> <td>0.100</td> </tr> </tbody> </table>	Item		Quantity/pcs						LSD	LKK	LBI	LUT		Date	19/9/19	1/10/19	28/6/19	-	1	20 L plastic pesticides containers	173	19	190	-	2	4 L plastic pesticides containers	118	63	181	-	3	Storm – Rat Bait Boxes	-	-	278	-	4	Ally bottles	81	26	53	-	Item		Quantity/mt							LSD	LUT	LKK	LBI	SPOM		Date	19/9/19	30/9/19	21/9/19	29/9/19	19/9/2019	1	SW109	-	0.012	-	-	-	2	SW110	-	0.440	-	-	0.150	3	SW305	0.522	0.200	0.250	0.0280	4.200	4	SW307	0.209		0.450	0.009	-	5	SW408	0.015		-	0.011	-	6	SW409	-	0.022	-	-	0.120	7	SW410	0.035	0.250	0.005	0.009	0.100	<p>Yes</p>
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Criterion / Indicator		Assessment Findings							Compliance
		8	SW404	-	-	0.450 (27/9/19)	0.0009	-	
		LUT storage at 1 year due to the low quantity and approval being sought from DOE via letter dated 21/6/19.							

<p>5.3.3</p>	<p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -</p>	<p>There are procedures and guidelines in the disposal of wastes and pollutants guided by SQD Head Office level to minimise pollution on the routine operation.</p> <table border="1" data-bbox="978 475 1778 1142"> <thead> <tr> <th colspan="4"><i>Estates/Mill</i></th> </tr> <tr> <th></th> <th>Type of waste</th> <th>Description</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Domestic waste</td> <td>Rubbish</td> <td>Line sites, office, workshop, store,</td> </tr> <tr> <td rowspan="3">2</td> <td rowspan="3">Industrial waste</td> <td>Fertilizer bags</td> <td>Empty bags store</td> </tr> <tr> <td>Scrap metal</td> <td>workshop</td> </tr> <tr> <td>POME</td> <td>ETP</td> </tr> <tr> <td>3</td> <td>Sewage waste</td> <td>sewage</td> <td>Workers &housing toilets & office</td> </tr> <tr> <td rowspan="4">4</td> <td rowspan="4">Scheduled Waste</td> <td>SW 404 Clinical waste</td> <td>clinic</td> </tr> <tr> <td>SW rags, plastics, filters</td> <td>workshop</td> </tr> <tr> <td>Spent lubricant & hydraulic oil</td> <td>workshop</td> </tr> <tr> <td>Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW,</td> <td>Scheduled waste store</td> </tr> </tbody> </table> <table border="1" data-bbox="978 1174 1778 1367"> <thead> <tr> <th colspan="4"><i>Estates/Mill</i></th> </tr> <tr> <th></th> <th>Type</th> <th>Description</th> <th>Action</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Domestic waste</td> <td>Rubbish</td> <td>Collection/disposal min 2x-3x /week internally. Establish landfill/collection SOP</td> </tr> </tbody> </table>	<i>Estates/Mill</i>					Type of waste	Description	Location	1	Domestic waste	Rubbish	Line sites, office, workshop, store,	2	Industrial waste	Fertilizer bags	Empty bags store	Scrap metal	workshop	POME	ETP	3	Sewage waste	sewage	Workers &housing toilets & office	4	Scheduled Waste	SW 404 Clinical waste	clinic	SW rags, plastics, filters	workshop	Spent lubricant & hydraulic oil	workshop	Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW,	Scheduled waste store	<i>Estates/Mill</i>					Type	Description	Action	1	Domestic waste	Rubbish	Collection/disposal min 2x-3x /week internally. Establish landfill/collection SOP	<p>Yes</p>
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				<p><i>Landfill site LSD98/B2</i> <i>Landfill site LUT P86</i> <i>Landfill site LKK P99/Block 1</i> <i>Landfill site LBI P97 Block 3</i> Establish collection schedule & PIC Create awareness on hygiene Monitoring of line site</p>		
		2	Industrial waste	<p>Fertilizer bags Inventory of bags, reuse for LF collection, sell to appointed contractor</p> <p>Scrap metal Inventory maintained, tender at zone level for sale to licensed contractor.</p> <p>POME Daily monitoring of application at designated field P04 Sedenak Estate.</p>		
		3	Sewage waste	<p>sewage To monitor during housing inspection and residents' complaints. Engagement with licensed contractor for sewage management.</p>		
		4	Scheduled Waste	<p>SW 404 Clinical waste Inventory maintained. Storage in sharp bin in clinic. Disposal to <i>Kualiti Alam Sdn Bhd.</i></p> <p>SW rags, plastics, filters Inventory maintained. Storage in scheduled waste store. Disposal to licensed contractor.</p>		

Criterion / Indicator		Assessment Findings		Compliance
			<p>Spent lubricant & hydraulic oil</p> <p>Collection by licensed vendor. Inventory maintained.</p> <p>Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW,</p> <p>Inventory maintained. Storage in SW store. All containers are labeled. Empty containers collected by authorized vendor.</p>	
<i>Sedenak Mill (type of waste peculiar to the mill processing)</i>				
		Type of waste	Action	
		1 POME	Application at designated field specified by Agronomist.	
		2 EFB	Application at designated field specified by Agronomist.	
		3 Fibre/shell	Utilization as fuel in the boiler. Surplus fibre used in compost production & shell sold externally	
		4 Boiler Ash	Placed in area far from water source to prevent water pollution.	
<p>Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>				

<p>5.4.1</p>	<p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -</p>	<p>The utilisation of fossil fuel in 2019 is being monitored with records shown below</p> <table border="1" data-bbox="978 443 1839 879"> <thead> <tr> <th></th> <th colspan="3"><i>Ladang Sedenak</i></th> <th colspan="3"><i>Ladang K Kabong</i></th> </tr> <tr> <th></th> <th>FFB mt</th> <th>Diesel L</th> <th>Diesel/F FB</th> <th>FFB mt</th> <th>Diesel L</th> <th>Diesel/F FB</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>5540</td><td>4167</td><td>1.33</td><td>2844</td><td>1607</td><td>0.57</td></tr> <tr><td>Feb</td><td>4926</td><td>3522</td><td>1.40</td><td>2534</td><td>1452</td><td>0.57</td></tr> <tr><td>Mac</td><td>5456</td><td>2998</td><td>1.82</td><td>2368</td><td>1656</td><td>0.70</td></tr> <tr><td>Apr</td><td>5181</td><td>2766</td><td>1.87</td><td>1393</td><td>1766</td><td>1.27</td></tr> <tr><td>May</td><td>4435</td><td>2977</td><td>1.49</td><td>2147</td><td>2205</td><td>1.03</td></tr> <tr><td>June</td><td>4801</td><td>3019</td><td>1.59</td><td>1759</td><td>1586</td><td>0.90</td></tr> <tr><td>July</td><td>5228</td><td>3456</td><td>1.51</td><td>2199</td><td>1898</td><td>0.86</td></tr> <tr><td>Aug</td><td>4973</td><td>3979</td><td>1.25</td><td>2231</td><td>2505</td><td>1.12</td></tr> <tr><td>total</td><td>40540</td><td>26884</td><td>1.51</td><td>17477</td><td>15475</td><td>0.89</td></tr> </tbody> </table> <table border="1" data-bbox="978 911 1839 1347"> <thead> <tr> <th></th> <th colspan="3"><i>Ladang Ulu Tiram</i></th> <th colspan="3"><i>Ladang Basir Ismail</i></th> </tr> <tr> <th></th> <th>FFB mt</th> <th>Diesel L</th> <th>Diesel/F FB</th> <th>FFB mt</th> <th>Diesel L</th> <th>Diesel/F FB</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>944</td><td>711</td><td>0.75</td><td>5891</td><td>6842</td><td>1.16</td></tr> <tr><td>Feb</td><td>825</td><td>651</td><td>0.79</td><td>4292</td><td>6385</td><td>1.49</td></tr> <tr><td>Mac</td><td>811</td><td>842</td><td>1.04</td><td>4099</td><td>6967</td><td>1.70</td></tr> <tr><td>Apr</td><td>721</td><td>728</td><td>1.01</td><td>3450</td><td>6390</td><td>1.85</td></tr> <tr><td>May</td><td>792</td><td>472</td><td>0.60</td><td>3933</td><td>6875</td><td>1.75</td></tr> <tr><td>June</td><td>871</td><td>933</td><td>1.07</td><td>4673</td><td>7135</td><td>1.53</td></tr> <tr><td>July</td><td>882</td><td>1096</td><td>1.24</td><td>5467</td><td>6172</td><td>1.13</td></tr> <tr><td>Aug</td><td>962</td><td>738</td><td>0.77</td><td>5461</td><td>7098</td><td>1.30</td></tr> <tr><td>total</td><td>6807</td><td>6171</td><td>0.91</td><td>37266</td><td>53864</td><td>1.45</td></tr> </tbody> </table>		<i>Ladang Sedenak</i>			<i>Ladang K Kabong</i>				FFB mt	Diesel L	Diesel/F FB	FFB mt	Diesel L	Diesel/F FB	Jan	5540	4167	1.33	2844	1607	0.57	Feb	4926	3522	1.40	2534	1452	0.57	Mac	5456	2998	1.82	2368	1656	0.70	Apr	5181	2766	1.87	1393	1766	1.27	May	4435	2977	1.49	2147	2205	1.03	June	4801	3019	1.59	1759	1586	0.90	July	5228	3456	1.51	2199	1898	0.86	Aug	4973	3979	1.25	2231	2505	1.12	total	40540	26884	1.51	17477	15475	0.89		<i>Ladang Ulu Tiram</i>			<i>Ladang Basir Ismail</i>				FFB mt	Diesel L	Diesel/F FB	FFB mt	Diesel L	Diesel/F FB	Jan	944	711	0.75	5891	6842	1.16	Feb	825	651	0.79	4292	6385	1.49	Mac	811	842	1.04	4099	6967	1.70	Apr	721	728	1.01	3450	6390	1.85	May	792	472	0.60	3933	6875	1.75	June	871	933	1.07	4673	7135	1.53	July	882	1096	1.24	5467	6172	1.13	Aug	962	738	0.77	5461	7098	1.30	total	6807	6171	0.91	37266	53864	1.45	<p>Yes</p>
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RSPO Public Summary Report
Revision 8 (Mar /2019)

<i>Sedenak Mill</i>				<i>Sedenak Mill</i>			
	Diesel L	FFB/m t	Diesel/F FB		Diesel L	FFB/m t	Diesel/F FB
Jan	27409	38901	0.70	June	45978	27999	1.64
Feb	54370	30812	1.76	July	46328	38909	1.19
Mac	50617	35101	1.44	Aug	51334	37579	1.37
Apr	51512	14123	3.65	-	-	-	-
May	42332	21723	1.95	total	369875	245149	1.51

Performance variation in view of several factors i.e.

- infrastructure of estates,
- community size / no of gen-sets,
- no of vehicles / age of machine.
- Weather interference / crop production volume

In addition, the mill also performed the monitoring of renewable energy usage in its operations. The data compiled as shown below.

Month	FFB production	Fibre/mt	Shell/mt	EFB mt
Jan	38901	5878	2456	7939
Feb	30812	4836	1943	6073
Mac	35101	5696	1877	6879
Apr	14123	2041	883	2909
May	21723	3074	1371	3584
June	27999	3792	1768	5826
July	38909	5220	2287	8167
Aug	37579	-	-	7491
Total	245149	30537	12586	48871

Criterion / Indicator		Assessment Findings	Compliance
		When the renewable energy consumption is maximised the utilisation of non-renewable is reduced.	
Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.			
5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -	There is no land preparation by burning at the estates audited. Sustainability handbook has described therein on Environmental Policy (signed by the Executive Director) to include the adoption of Zero Open Burning Policy dated January 2008. The management endorsed commitment to fully comply with the Malaysian environmental law – EQA and Regulations 1974.	Yes
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 -	There is no land preparation by means of burning at both the estates. This is confirmed through observation during the field visits and interview with the workers.	Yes
Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			

<p>5.6.1</p>	<p>An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -</p>	<p>Pollution & Emission management plan for mill (01/10/2019) has been established to identify the polluting activities arising from the operations. The particulate and soot emission is being monitored. The quality monitoring report submitted to DOE has been reviewed and it is conform to the legislative requirement of within the limit of 260ppm. Results as follows;</p> <table border="1" data-bbox="1070 587 1765 954"> <thead> <tr> <th rowspan="2">No</th> <th rowspan="2">Date</th> <th colspan="2">Stack sampling (Standard 150 mg/Nm3)</th> <th colspan="2">Ambient Air (suspended particulate) standard 260 ug/m3)</th> </tr> <tr> <th>Boiler 3</th> <th>Boiler 4</th> <th>Pt A</th> <th>Pt B</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>30/1/18</td> <td>-</td> <td>240</td> <td>27</td> <td>23</td> </tr> <tr> <td>2</td> <td>12/7/18</td> <td>150</td> <td>-</td> <td>24</td> <td>43</td> </tr> <tr> <td>3</td> <td>17/1/19</td> <td>215</td> <td>-</td> <td>22</td> <td>28</td> </tr> <tr> <td>4</td> <td>15/7/19</td> <td>410</td> <td>-</td> <td>11</td> <td>17</td> </tr> </tbody> </table> <p>Stack sampling on exceeding the limits is being improved through initiative which is either in plan or progressing;</p> <table border="1" data-bbox="1003 1082 1836 1348"> <thead> <tr> <th></th> <th>Projects</th> <th>Status</th> <th>Objectives</th> <th>Timeline</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Boiler no 3 water tube</td> <td>Initial stage of installation</td> <td>Improved steam efficiency and dust particulate</td> <td>May 2020</td> </tr> <tr> <td>2</td> <td>Electrostatic precipitator</td> <td>Work progressing</td> <td>Reduce particulate through electrostatic trapping</td> <td>Dec 2020</td> </tr> </tbody> </table>	No	Date	Stack sampling (Standard 150 mg/Nm3)		Ambient Air (suspended particulate) standard 260 ug/m3)		Boiler 3	Boiler 4	Pt A	Pt B	1	30/1/18	-	240	27	23	2	12/7/18	150	-	24	43	3	17/1/19	215	-	22	28	4	15/7/19	410	-	11	17		Projects	Status	Objectives	Timeline	1	Boiler no 3 water tube	Initial stage of installation	Improved steam efficiency and dust particulate	May 2020	2	Electrostatic precipitator	Work progressing	Reduce particulate through electrostatic trapping	Dec 2020	<p>Yes</p>
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Criterion / Indicator		Assessment Findings	Compliance
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	The GHG emissions due to the operations is identified and recorded in the palm GHG version 3.01. The emission reduction plan for mill and estates for all complexes is published in the Carbon Footprint report. The plan includes reduction of fertilizer usage by embarking organic fertilizer and installation of biogas plan.	Yes
5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -	The summary of the Net GHG emitted for <i>Sedenak Palm Oil Mill</i> and supply base are as per appendix C below.	Yes
Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.			
Criterion 6.1: Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.			
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	Social Impact Register for KMB and JCorp; SR001-SR075. For Sedenak complex, sighted the Daftar Impak Sosioal Kulim (Malaysia) Berhad 2019 dated 15/08/19. For each respective estates and mill, there is Cadangan Penambahbaikan Sosial 2019. Communications, copied form complaints/grievances form were recorded in Enquiry Register Book.	Yes
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	Sedenak Mill, Sedenak Estate & Kuala Kabong Estate: Mesyuarat dan Sesi Taklimat Bersama Stakeholder, Kontraktor, Pembekal (FFB & Hardware) 2019 di Legend Golf Resort, Sedenak; Date: 3/9/2019. Basir Ismail Estate Mesyuarat Pengurusan Ladang Basir Ismail Bersama Pihak Berkepentingan; Date: 10/09/2019.	Yes

Criterion / Indicator		Assessment Findings	Compliance
6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -	Plans included in Kulim Social Improvement Program; SPO Team; Ver. 1.0; Date: 02/2018; Consists of Community, Electric Supply, Crèche Operation, Estate Operation, Effluent Discharge, Transporting, Health and Sanitation, Harvesting, Manuring (Manual), Water Supply, Housing and Amenities, Handling and Use of Pesticide, Operation Hour-Mill, Replanting, Mill Operation-Mill.	Yes
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	The plan was reviewed on yearly basis and the last reviewed was conducted on Cadangan Penambahbaikan Sosial bagi Sedenak POM, Sedenak Estate, Ulu Tiram Estate, Basir Ismail Estate and Kuala Kabong Estate dated 15/09/19. It includes all the related issues for both internal and external stakeholder's issues.	Yes
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	No scheme smallholder involved in the Sedenak POM certification unit.	Not applicable
Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.			

Criterion / Indicator		Assessment Findings	Compliance
6.2.1	<p>Consultation and communication procedures shall be documented.</p> <p>- Major compliance -</p>	<p>Kulim (M) Berhad has implemented the SPO Consultation and Transparency Plans dated 4/9/2007 and a Communication and Consultation Management Guidelines (Communication Procedure V3.0) generated by SPO team on Jan 19. The aim of this plan is to ensure an open and transparent communication methods with local communities and other stakeholders. The guideline is specific to communicate and consult with respect to social and environment aspects and impacts, performance and OSH issues. Any request for information on social, OHS and environmental policies and performance shall be recorded in the Enquiry Register and acted upon within 7 working days. Any grievance (social, OHS and environmental issues) shall also be recorded in the Enquiry Register and responded by following the KULIM's Grievance Procedure. Findings shall be communicated to the party concerned and records are kept.</p>	Yes
6.2.2	<p>A management official responsible for these issues shall be nominated.</p> <p>- Minor compliance -</p>	<p>In Sedenak Mill, sighted letter dated 01.01.2019, Appointment as Social Person In-Charge to Assistant Mill Engineer (Mohd Hafiz Bin Saron). In Sedenak Estate; Chief Clerk (Rosiah Ahmad); Letter dated: 1/1/2017; in Ulu Tiram Estate; Chief Clerk (Zuraidah Yusof); Letter dated: 1/1/2017; in Basir Ismail Estate, Assistant Manager (Mohd Raziz bin Rahmat); Letter dated 01/03/2019; in Kuala Kabong Estate; Chief Clerk (Siti Ani Binti Haji Ehsani); Letter dated: 01/01/2018.</p>	Yes

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Criterion / Indicator		Assessment Findings	Compliance
6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -	Mill: Established as the list for Internal & External Stakeholder; May 2019 consist of executive & staff, customer and others including authorities, vendors and local communities. No complaints/grievances recorded. Stakeholders List (Updated for Sedenak Mill on May 2019, Sedenak Estate on July 2019, Ulu Tiram Estate on July 2019, Basir Ismail Estate on August 2019 and Kuala Kabong Estate on August 2019) of Government & Non-Government Agencies; Shopkeepers; Contractors; Suppliers; Estate Boundaries (Neighbors); Estate/Mill/Entrepreneurs. Communications, copied form complaints/grievances form were recorded in Enquiry Register book with latest enquiry registered: Inspection of Department of Environment to Sedenak POM on 17/09/2019, inspection of SAJ Ranhill ground physical survey on 26/08/2019.	Yes
Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.			
6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance -	System established based on documented SPO Grievance Procedure Program; Dated: 4/9/2018 as Kulim Grievance Procedure Plans and Grievance Policy (Polisi Kilanan dated 1/5/2018).	Yes
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –	The Enquiry Register and Housing Complaint Logbook were being used to record any request, complaints and grievances from the stakeholders. There was no any complaints recorded since last audit except for housing damages which were resolved within timeframe.	Yes
Criterion 6.4: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			

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Criterion / Indicator		Assessment Findings	Compliance
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	Procedure in place was SPO Negotiations Concerning Compensation Program; Dated: 4/9/2007. The procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly also referring to Workmen’s Compensation Act 1952.	Yes
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 -	Kulim (M) Berhad has established SOP to identify legal and customary rights as well as people entitled to compensation as per procedure in place i.e. SPO Negotiations Concerning Compensation Program; Dated: 4/9/2007. The procedure is to ensure any negotiation with regards to compensation for loss of local rights are dealt with fairly.	Yes
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	No any dispute issues that required any compensation occurred since the last audit.	Yes
Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.			

Criterion / Indicator	Assessment Findings	Compliance
6.5.1 Documentation of pay and conditions shall be available. - Major compliance -	Documentations of pay and conditions made available at all sampled operating units based on SPO Pay and Conditions Program; Kulim Pay and Conditions Plan; Dated: 4/9/2007. Pay slips sampled for August, June and April 2019 as per following workers: Sedenak Mill: 1. Mohd Suhaimi bin Yahaya (Sedenak Mill). 2. Roni Hartono (Sedenak Mill). 3. Muhamad Shafik Salman (Sedenak Mill). 4. Edi Jaya Saputra (Sedenak Mill). 5. Hatmawati (Sedenak Estate). 6. Ranu Kanti Dash (Sedenak Estate). 7. Mohammad Moazzem Hossen (Sedenak Estate). 8. Surono (Contract Workers Sedenak Estate). 9. Suyikno (Contract Workers Sedenak Estate). 10. Maimah Binti Bakri (Ulu Tiram Estate). 11. Alam Miah (Ulu Tiram Estate). 12. Husniati (Ulu Tiram Estate). 13. Sumarno (Contract Worker of Ulu Tiram Estate). 14. Jono (Contract Worker of Ulu Tiram Estate). 15. Adi Saputra (Basir Ismail Estate). 16. Supiah Binti Ismail (Basir Ismail Estate). 17. Robi Sugara (Basir Ismail Estate). 18. Suparman (Contract Worker of Basir Ismail Estate). 19. Zohri (Contract Worker of Basir Ismail Estate). 20. Sri Utami (Kuala Kabong Estate). 21. Govi Nalosa Putra (Kuala Kabong Estate). 22. Supardi (Kuala Kabong Estate). 23. Pambudi Suwanto (Contract Worker of Kuala Kabong Estate).	Yes

Criterion / Indicator	Assessment Findings	Compliance
<p>6.5.2</p> <p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p>- Major compliance -</p>	<p>Based on SPO Pay and Conditions Program; Kulim Pay and Conditions Plan; Dated: 4/9/2007, the basic salary was based on current MAPA/NUPW agreement; Operator allowance (if eligible): RM 1.70/day; Shift allowance (if eligible): RM 3.00/day. Conditions were all met accordingly.</p> <p>Sedenak Mill:</p> <ol style="list-style-type: none"> 1. Mohd Suhaimi bin Yahaya (Sedenak Mill). 2. Roni Hartono (Sedenak Mill). 3. Muhamad Shafik Salman (Sedenak Mill). 4. Edi Jaya Saputra (Sedenak Mill). 5. Hatmawati (Sedenak Estate). 6. Ranu Kanti Dash (Sedenak Estate). 7. Mohammad Moazzem Hossen (Sedenak Estate). 8. Surono (Contract Workers Sedenak Estate). 9. Suyikno (Contract Workers Sedenak Estate). 10. Maimah Binti Bakri (Ulu Tiram Estate). 11. Alam Miah (Ulu Tiram Estate). 12. Husniati (Ulu Tiram Estate). 13. Sumarno (Contract Workers Ulu Tiram Estate). 14. Jono (Contract Workers Ulu Tiram Estate). 15. Adi Saputra (Basir Ismail Estate). 16. Supiah Binti Ismail (Basir Ismail Estate). 17. Robi Sugara (Basir Ismail Estate). 18. Suparman (Contract Worker of Basir Ismail Estate). 19. Zohri (Contract Worker of Basir Ismail Estate). 20. Sri Utami (Kuala Kabong Estate). 21. Govi Nalosa Putra (Kuala Kabong Estate). 22. Supardi (Kuala Kabong Estate). 23. Pambudi Suwanto (Contract Worker of Kuala Kabong Estate). 	<p>Yes</p>

Criterion / Indicator		Assessment Findings	Compliance
6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. - Minor compliance –	Kulim (M) Berhad has provided free housing and medical assistance to all the workers. Water and electricity was provided with subsidize rate as mentioned in the employment contract and JTK permit of salary deduction as per requirement 2.1.1. Government school was found in the compound of Sedenak complex. Linesite inspection was conducted on weekly basis by Hospital Assistant and twice a month together with VMO. Domestic water supplies were either from the government or own treatment with samples taken and sent for analysis to ensure compliance with drinking water standard for own treated water.	Yes
6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers’ access to adequate, sufficient and affordable food. - Minor compliance –	Site visit to the coffee shop & grocery operates in the estate who is selling cooked foods, processed snacks and beverages at canteen and sundries shop. All the foods and drinks sold are displayed with price.	Yes
Criterion 6.6: The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	Kulim (M) Berhad has implemented Guidelines for General Workers where they respect the rights of the workers to join any association that recognized by the company. The guideline has distributed to each of the workers. Besides, the company has established Kulim Sustainability Handbook where under Core Labour Standards, the workers has been given rights to join or form trade union and to bargain collectively. SPO core labour values – Kulim Core Labour Value Plans.	Yes

Criterion / Indicator	Assessment Findings	Compliance
6.6.2 Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	Meeting with Union representatives was conducted on periodical basis at all operating units. In general, the meetings outcome highlighted the action plan to monitor the issues raised during the meeting was developed. The action plan was updated accordingly if any issue has been resolved. Sampled minutes of meetings sighted as following: Mill: Mesyuarat Bersama Wakil NUPW/AMESU 01/2019; Date: 02/05/2019 SDE: Mesyuarat bersama pegawai NUPW; 5/9/2018. UTE: Mesyuarat Bersama Dengan Majikan Date: 24/07/2019. BSE: Mesyuarat Antara Majikan, Wakil Pekerja dan Wakil Union 01/2019 Date: 14/02/2019. KKE: Mesyuarat Bersama Wakil NUPW 1/2019 on 25/09/2019.	Yes
Criterion 6.7: Children are not employed or exploited.		
6.7.1 There shall be documentary evidence that minimum age requirements are met. - Major compliance -	Kulim (M) Berhad has implemented Guidelines for General Workers and Kulim Sustainability Handbook where they will not employ Child Labour according to Children and Young Persons (Employment) Act 1966. Records of employee particulars sighted at all operating units as per following sample: Mill: No, based on the list of workers for Sedenak Mill 2018. There were trainings entitled 'No Child Labour Policy' conducted. Sighted latest was done on 01/08/2019 attended by 94 people in Sedenak POM, 11/06/2019 attended by 228 people in Sedenak Estate, 25/09/2019 attended by 129 people in Ulu Tiram Estate, 12/09/2019 attended by 282 people in Basir Ismail Estate and 28/01/2019 attended by 128 people in Kuala Kabong Estate. Estate: No, based on the list of workers (Local & Foreign) as of 2019. Through document reviewed found that all the workers were above 18 years old.	Yes

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	Kulim (M) Berhad has implemented Kulim Sustainability Handbook dated 1 September 2018 and Guidelines for General Workers. People Policy dated 1/1/2008 has been developed and the management is committed to support non-discrimination in any form. Sighted latest was done on 01/08/2019 attended by 94 people in Sedenak POM, 11/06/2019 attended by 228 people in Sedenak Estate, 25/09/2019 attended by 129 people in Ulu Tiram Estate, 12/09/2019 attended by 282 people in Basir Ismail Estate and 28/01/2019 attended by 128 people in Kuala Kabong Estate. Policy also available publicly and displayed within office area of all operating units.	Yes
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	Migrant workers are recruited with 2 years contract for Indonesian and 3 years contract for Bangladeshi. Local workers are on a long term employment. No any kind of discrimination was noted. Job opportunities and amenities such as free housing, water and electricity supplies, medical care are given to all employees without discrimination. All employees are aware of the grievance procedures through the various Committees such as Gender Committee for women, foreign worker’s representation and union committee to highlight their concerns and grievances if any.	Yes
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 -	Recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. It was noted during the audit that there is no discrimination based on nationality, race, gender and age.	Yes
Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.			

Criterion / Indicator		Assessment Findings	Compliance
6.9.1	<p>Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce.</p> <p>- Major compliance -</p>	<p>Policy to prevent sexual and all other forms of harassment and violence has been updated as Kulim (Malaysia) Berhad Sexual Harassment Policy; Signed by Executive Director; Dated: 1/5/2018. Policy has been communicated in latest meetings as per records of followings:</p> <p>Sedenak: Minit Mesyuarat Ahli Jawatankuasa Persatuan WOW Sedenak 01/2019 dated 19.04.2019 & 15.02.2019; Yasin dan Bicara Petang; 08/08/2019.</p> <p>Sedenak Mill: Carta Organisasi WOW 2010-Minit Mesyuarat WOW 03/2019; Date: 09/08/2019, 02/019 meeting on 07/05/2019, 01/19 meeting on 11/09/2019; Minit Mesyuarat WOW No. 2/2019.</p> <p>Ulu Tiram Estate: Mesyuarat Ahlijawatankuasa 2/19 on 14/06/2019 & 25/01/2019; sambutan hari raya UTE (03/07/2019), sambutan hari raya WOW kompleks Sedenak (28/06/2019).</p> <p>Basir Ismail Estate: Minit Mesyuarat WOW Dated: 11/09/2019 and 10/02/2019.</p> <p>Kuala Kabong Estate: Minit Mesyuarat WOW 6/2019 Kulim (Malaysia) Berhad Ladang Kuala Kabong Dated: 22/08/2019, 21/06/2019, 08/04/2019.</p>	Yes
6.9.2	<p>A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce.</p> <p>- Major compliance -</p>	<p>A policy to protect the reproductive rights of all, especially of women established as Rights of Employees; Signed by Executive Director; Dated: 8/1/2017. Policy has been communicated to all workers by the management at each operating units within Sedenak complex. Sighted latest was done on 01/08/2019 attended by 94 people in Sedenak POM, 11/06/2019 attended by 228 people in Sedenak Estate, 25/09/2019 attended by 129 people in Ulu Tiram Estate, 12/09/2019 attended by 282 people in Basir Ismail Estate and 28/01/2019 attended by 128 people in Kuala Kabong Estate.</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
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 -	Specific grievance mechanism which respects anonymity and protects complainants as requested established with appointed Panel Aduan Wanita; 07/11/2016 among woman employees to receive the grievance if any for Sedenak complex.	Yes
Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.			
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	Current and past FFB prices available in the mill as per MPOB guideline. The mill has displayed the FFB pricing from January to August 2019 at the weighbridge area. The pricing was according to MPOB set price. Grading guideline according to MPOB was publicly displayed at the weighbridge area. External uncertified purchased were based on Kulim's SPO fair and transparent Dealings Program; dated 04/09/2007.	Yes
6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). - Major compliance -	FFB price calculation was documented in the contract agreement signed by the FFB suppliers. The calculation is based on the monthly spot month average prices of CPO and Palm Kernel for Peninsular Malaysia declared by MPOB. The monthly payments were made in three instalments. First instalment was made on or before 15th of the month for FFB delivered in first 10 days. Second instalment was made on or before 25th of the month for the next 10 days crop received and the last payment was made on or before 7th day of the following month.	Yes
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 -	All parties understand the contractual agreements they enter into as per evidence of fair, legal and transparent contracts made available as following sample contract agreements: 1. Perniagaan Md Sangidi (Registration no: JM 0356901-V). 2. Az Iman Resources Sdn Bhd (Registration no: 1178485H).	Yes

Criterion / Indicator		Assessment Findings	Compliance
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	All payments were paid by head office upon received of invoices from the contractors. The payment was made within 30 days from the date of certification of submitted invoices. Interview with the contractors and suppliers confirmed that the payments were made promptly according to the contract agreement as per sample payments: <ol style="list-style-type: none"> 1. Payment Voucher no: PV1900796 dated 05/06/2019 (AZ Iman Resources Sdn Bhd). 2. Payment Voucher no: PV1900796 dated 05/09/2019 (Perniagaan Md Sangidi). 	Yes
Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.			
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	Contributions made based on consultation as per SPO Corporate Social responsibility programs – Kulim Corporate Social Responsibility. It was sighted in Integrated Annual Report 2018 “Strengthening Core Competences”, among the program is as below: <ol style="list-style-type: none"> 1. Persatuan Bola Sepak Negeri Johor 2. Raja Zarith Sofiah Wildlife Defenders Challenge 2018. 3. PINTAR foundation. 4. Yayasan Johor Corporation <p>Apart from that, the contribution for community also been implemented within each unit. Sighted sampled as below: Sedenak Estate: Transportation for Annual School Event 2019 on 04.05.2019. Ulu Tiram Estate: Hari Keusahawanan Sekolah 2019 at SJK(T) Ladang Ulu Tiram on 22.09.2019 (RM100) – Payment number 19000050. Basir Ismail Estate: Sumbangan Merentas Desa SJK(T) Ladang Nam Heng on 13/09/2019 (RM100) – Payment number 19000190. Kuala Kabong Estate: Donation for Maulider Rasul SKLKTP Bukit Batu (RM 100) on 28/02/2019.</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	No scheme smallholder involved in the Sedenak POM certification units.	Not applicable
Criterion 6.12: No forms of forced or trafficked labour are used.			
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	Kulim (M) Berhad has implemented Kulim Sustainability Handbook dated June 2007. People Policy has been developed and the management is prohibited to engage or support the use of forced labour in all of their operations and administrations. All the local and foreign workers were hold a valid identification card and passports prior to work. Passport of the foreign workers were kept by the management where it stated in the employment contract Section 9 for safety purpose. The workers had acknowledged and agreed on the safe keeping of passport.	Yes
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	Sedenak Mill Complex has the Polisi Insan which mentioning the non-discriminatory practices and decent living condition. The policy of 'No Contract Substitution' was established with the agreed timeline for corrective action plan for Employees approved by the Deputy General Manager.	Yes
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	Established as Kulim (Malaysia) Berhad Core Labour Standard; Signed by Executive Director; Dated: 1/5/2018. Sampled Contractor worker's agreement as in indicator 6.5.2 above.	Yes
Criterion 6.13: Growers and millers respect human rights.			

Criterion / Indicator		Assessment Findings	Compliance
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	Sedenak Mill Complex has the Polisi Insan which mentioning the non-discriminatory practices and decent living condition. The policy of 'No Contract Substitution' was established with the agreed timeline for corrective action plan for Employees approved by the Deputy General Manager. Policy has been communicated to all workers by the management at each operating units within Sedenak complex. Sighted latest was done on 01/08/2019 attended by 94 people in Sedenak POM, 11/06/2019 attended by 228 people in Sedenak Estate, 25/09/2019 attended by 129 people in Ulu Tiram Estate, 12/09/2019 attended by 282 people in Basir Ismail Estate and 28/01/2019 attended by 128 people in Kuala Kabong Estate.	Yes
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	This estate is located at Peninsular therefore, the requirement is not applicable.	Not applicable
Principle 7: Responsible development of new plantings			
Sedenak 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 surveillance assessment. The immature areas are replanted area.			
Principle 8: Commitment to continual improvement in key areas of activity			
Criterion 8.1: Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.			

<p>8.1.1</p>	<p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); <ul style="list-style-type: none"> • Optimising the yield of the supply base. <p>- Major compliance -</p>	<p>The CU adopted several continuous improvements in reducing of pesticides i.e. increasing planting of beneficial plants mainly <i>Tunera subulata</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> and continue to monitor pest through Early Warning System.</p> <ol style="list-style-type: none"> a) The CU also adopted planting of <i>Leguminious</i> Cover Crop mainly <i>Pueraria Javanica</i>, <i>euphobia</i> and <i>Calopogonium Mucunoides</i> at replanting area to minimize circle and selective weeding. b) <i>Neproliphis biserata</i> was maintained and encouraged to be planted in the estates. This can be seen in their continuous improvement plan. This was to suppress growth of noxious weeds and thus reduce the use of pesticides for selective weeding. c) Woody sprayings were carried out whenever necessary and only twice a year. Blanket spraying was not practiced encouraging soft grasses in inter row and frond stacking area <p>Sedenak Palm Oil Mill had the following projects in plan and with few also in progress for the improvement of the boiler particulate efficiency and effluent BOD reduction. Details as listed below;</p> <table border="1" data-bbox="1003 975 1839 1331"> <thead> <tr> <th></th> <th>Projects</th> <th>Status</th> <th>Objectives</th> <th>Timeline</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Boiler no 3 water tube</td> <td>Initial stage of installation</td> <td>Improved steam efficiency and dust particulate</td> <td>May 2020</td> </tr> <tr> <td>2</td> <td>Electrostatic precipitator</td> <td>Work progressing</td> <td>Reduce particulate through electrostatic trapping</td> <td>Dec 2020</td> </tr> <tr> <td>3</td> <td>Effluent pond</td> <td>New installation commissioning</td> <td>Further treatment of effluent to achieve level of 100 and below</td> <td>June 2020</td> </tr> </tbody> </table>		Projects	Status	Objectives	Timeline	1	Boiler no 3 water tube	Initial stage of installation	Improved steam efficiency and dust particulate	May 2020	2	Electrostatic precipitator	Work progressing	Reduce particulate through electrostatic trapping	Dec 2020	3	Effluent pond	New installation commissioning	Further treatment of effluent to achieve level of 100 and below	June 2020	<p>Yes</p>
	Projects	Status	Objectives	Timeline																			
1	Boiler no 3 water tube	Initial stage of installation	Improved steam efficiency and dust particulate	May 2020																			
2	Electrostatic precipitator	Work progressing	Reduce particulate through electrostatic trapping	Dec 2020																			
3	Effluent pond	New installation commissioning	Further treatment of effluent to achieve level of 100 and below	June 2020																			

		4 th quarter 2019		
4	Bio-polishing plant	Next year project	To reduce solids in effluent and to achieve BOD of 100	2020
<p>Environmental impact assessment, management action plans and continuous improvement plan for all the estates audited have been updated and monitored by management. The improvement actions among others:</p> <ul style="list-style-type: none"> a) Construction of sump at chemical and workshop to prevent ground or water contamination. b) Collect back chemicals bags and allocate store for control of misused. c) use of tray for tractor parking and workshop stations to prevent ground contamination <p>The management of Mill/Estates had plan to reduce emission by daily inspection and monitoring for their farm tractor/lorry and gen set/water treatment plant to prevent any leakage and problem which can impact on smoke emission.</p> <p>The management of both estates and mill had plan to reduce emission by daily inspection and monitoring for their farm tractor / lorry and gen set / water treatment plant to prevent any leakage and problem which can impact on smoke emission.</p> <p>The CU continued to improve the social impacts with activities like:</p> <ul style="list-style-type: none"> a) Repainting of workers houses a total of 20 units in yearly in phases. b) Organising of sports activities include indoor game. c) Replacement of furniture for staff quarters d) organized social events for worker and communities, such Workers' Day celebration together with the best & beautiful house 				

Criterion / Indicator	Assessment Findings	Compliance
	<p>competition Kulim Malaysia Bhd being a well-established organisation, had emphasised on the yield performance has always been the top priority in ensuring long-term economic and financial viability. In general, various efforts had been done to optimise the yield of the plantation such as;</p> <ul style="list-style-type: none"> a) maximizing crop recovery, optimum ripeness b) standard harvest ripe bunches only (10 MRS) and 100% loose fruit collection), c) the soil fertility was maintained and planting only high yielding planting material. d) Placement compost in the palm row for improved fertility. e) Mill wastes such as EFB were used as fertilizer in the fields f) Introduction of smart cut in 2020 in Basir Ismail Estate for advancement in harvesting productivity. g) Expansion in MB collection area 200 ha/yearly along with the palm maturity. 	

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Appendix B: Approved Time Bound Plan

Project	Estate	Plan
Indonesia: SUMASEL	PT Tempirai Palm Resources (PT TPR)	To be included in TBP upon completion of acquisition (expected completion in 2025)
	PT Rambang Agro Jaya (PT RAJ)	
Malaysia Trader	Bukit Layang Estate	2019
Malaysia Trader	Eng Lee Heng	2019

List of Estate Manage by Kulim (Malaysia) Berhad			
Mill Base	Kulim / Jcorp Estate	Estate	Status
Tereh Mill	Kulim Estate	Tereh Utara	Certified RSPO
		Tereh Selatan	
		Selai	
		Enggang	
		Mutiara	
		Sg Sembrong	
		Sg Tawing	
		Rengam	
Sedenak Mill	Kulim Estate	Sedenak	
		Basir Ismail	
		Ulu Tiram	
Sindora Mill	Kulim Estate	Kuala Kabong	
		REM/Pasak	
		Sindora	
Palong Mill	Kulim Estate	Sungai Papan	
		Sepang Loi	
		UMAC	
		Labis Bahru	
		Mungka	
		Kemedak	
Pasir Panjang Mill	Kulim Estate	Pasir Panjang	Certified RSPO
	Kulim Estate	Siang	
	Jcorp Estate	Bukit Kelompok	

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		Tunjuk Laut	
		Pasir Logok	
		Bukit Payung	

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in **2018** for **Sedenak POM** 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 **2018** for **Sedenak Palm Oil Mill** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.27
PKO	-

Extraction	%
OER	20.42
KER	5.52

Production	t/yr
FFB Process	469716.64
CPO Produced	95903.00
PKO Produced	-

Land Use	Ha
OP Planted Area	42209.74
OP Planted on peat	1362.29
Conservation (forested)	0.00
Conservation (non-forested)	310.24
Total	43882.27

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	72823.56	0.45	14997.49	0.47	149915.46	0.52	237736.51	0.50
CO ₂ Emission from fertilizer	6004.55	0.04	1635.86	0.05	2510.06	0.01	10150.47	0.02
NO ₂ Emmision	16938.27	0.1	1232.16	0.04	2011.11	0.01	20181.54	0.04
Fuel Consumption	912.33	0.01	494.5	0.01	4524.97	0.02	5931.80	0.01
Peat Oxidation	74292.04	0.46	0	0	0	0	74292.04	0.15
Sink								
Crop Sequestration	-69053.83	-0.42	-14693.11	-0.45	-132772.58	-0.45	-216519.52	-0.46
Conservation Sequestration	0	0	-36.57	0	0	0	-36.57	-0

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Total	101916.92	0.62	3630.33	0.12	26189.02	0.1	154713.34	0.33
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**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	33881.82	0.07
Fuel Consumption	1241.25	0
Grid Electricity Utilisation	0	0
Credit		
Export of Grid Electricity	-47.57	0
Sales of PKS	-12098.44	-0.03
Sales of EFB	0	0
Total	22977.07	0.05

Summary of Kernel Crusher Emission and Credit (if applicable)

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

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	48
Divert to anaerobic diversion (%)	52

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	61.00
Divert to methane captured (flaring) (%)	37.00
Divert to methane captured (energy generation) (%)	2.00

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

5.1 Applicability of the general chain of custody requirements for the supply chain									
	Requirement	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)						
5.1.1	The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.	Sedenak Palm Oil Mill takes legal ownership and physically handles its RSPO certified oil palm products i.e. CPO and PK.	Yes						
5.1.2	Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.	Sedenak POM is not a trading company. Therefore, this requirement is not applicable.	Not applicable						
5.1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.	Company info available through RSPO IT Platform as following: <table border="1" data-bbox="1153 1045 1892 1189"> <tr> <td>Member Name</td> <td>Kulim (Malaysia) Berhad – Sedenak Palm Oil Mill</td> </tr> <tr> <td>Member ID</td> <td>RSPO_PO1000000019</td> </tr> <tr> <td>RSPO Membership Number</td> <td>1-0080-09-000-00</td> </tr> </table>	Member Name	Kulim (Malaysia) Berhad – Sedenak Palm Oil Mill	Member ID	RSPO_PO1000000019	RSPO Membership Number	1-0080-09-000-00	Yes
Member Name	Kulim (Malaysia) Berhad – Sedenak Palm Oil Mill								
Member ID	RSPO_PO1000000019								
RSPO Membership Number	1-0080-09-000-00								
5.1.4	Processing aids do not need to be included within an organization’s scope of certification.	Processing aids are not used in the milling process.	Not applicable						
5.2 Supply chain model									

5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	Sedenak POM is using the MB supply chain model since it receive the FFB from own supply bases and outside FFB suppliers. 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.	Sedenak POM is using the MB supply chain model since it receive the FFB from own supply bases and outside FFB suppliers.	Yes
5.3. Documented Procedures			
5.3.1	The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. 	The written procedure available is Sustainable Management System; Traceability; Doc. # SQD/SMS/1.2; Issue # 1; Date: 28/2/2019. On the marketing side, Procedure title: RSPO Supply Chain; Procedure # MKD/001; Date: 9/10/2018 is referred to.	Yes
	<ul style="list-style-type: none"> • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 	Records of Todate FFB Received dated 28/9/2019 for FFB received from own certified, group certified and non-certified source sighted available. Other than own supplying estates (Sedenak, Ulu Tiram, Basir Ismail & Kuala Kabong), external suppliers including the sample sighted as following: <ul style="list-style-type: none"> - Kebun Sedenak - Peladang Kulai - Guan Leng - Ree Fong October 2018 – August 2019: Total FFB received: 379,767.51 mt Certified FFB: 135,992.80 mt Uncertified FFB: 243,774.71 mt Total FFB processed: 379,767.51 mt	Yes

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		Total CPO produced: 79,355.83 mt Total PK produced: 20,867.96 mt Total CPO despatched: 59,870.98 mt Total PK despatched: 1,055.72 mt	
	<ul style="list-style-type: none"> • Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization’s procedures for the implementation of this standard. 	The person having overall responsibility for and authority over the implementation is Head of each operating unit for RSPO, MSPO and ISCC Certification Program, as per appointment letter SQD/ADMIN/017/19; Dated 22/9/2019. For Sedenak Mill, the Senior Mill Manager is Haji Kamaroulzaman Thith.	Yes
5.3.2	The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.	Written procedures established as Sustainable Management System, Internal Audit Doc. # SQD/SMS/5.0; Issue # 1; Date: 1/7/2018 as the Internal Audit Procedure where the SCC audit shall be conducted as per Internal Audit Process which covers internal audit schedule (plan), audit report, non-conformance report, correction and corrective action, review and closing the NCR.	Yes
	ii) effectively implements and maintains the standard requirements within its organization	As per SOP, the management has conducted the Internal Audit at least once within 12 months (before the expiry of the certificate). Internal audit Non-conformance Report and Internal Audit checklist dated 26/8/2019 sighted for Sedenak POM and available during the audit.	Yes
5.4. Purchasing and goods in			
5.4.1	The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form: <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; 	Implementation was based on System; Traceability; Doc. # SQD/SMS/1.2; Issue # 1; Date: 28/2/2019 Sample internal certified FFB received: - Supplier: Basir Ismail Estate; W/bridge ticket # 382250; Date: 27/9/2019; DO # 087794; Nett weight: 41,920kg; Vehicle # JMU 8236	Yes

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	<ul style="list-style-type: none"> • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number 	<ul style="list-style-type: none"> - Supplier: Kuala Kabong Estate; W/bridge ticket # 382273; Date: 27/9/2019; DO # 029102; Nett weight: 36,650kg; Vehicle # WFP 4832 <p>Sample group certified FFB received:</p> <ul style="list-style-type: none"> - Supplier: Sungai Papan Estate; W/bridge ticket # R372293; Date: 7/3/2019; DO # 237959; Nett weight: 37,390kg; Vehicle # WFW 4693 - Supplier: Sindora Estate; W/bridge ticket # R372243; Date: 7/3/2019; DO # 237492; Nett weight: 37,550kg; Vehicle # JQC 7101 <p>Sample external uncertified FFB received:</p> <ul style="list-style-type: none"> - Supplier: Ree Fong Agriculture Sdn. Bhd.; W/bridge ticket # 382260; Date: 27/9/2019; DO # 217919; Nett weight: 6,860kg; Vehicle # JBS 2657 <p>Supplier: Guan Leng Trading Sdn. Bhd.; W/bridge ticket # 382252; Date: 27/9/2019; DO # 145389; Nett weight: 44,490kg; Vehicle # JTP 4311</p>	
	<ul style="list-style-type: none"> • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). 	<p>Complete information available in various documents consist of delivery orders and weighbridge tickets.</p>	<p>Yes</p>
	<ul style="list-style-type: none"> • The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance. 	<p>The mill has a list of certified FFB suppliers which has the information about certificate number and validity period. This is applied to both second and third party FFB suppliers.</p>	<p>Yes</p>

	<ul style="list-style-type: none"> A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements. 	<p>A check of the validity of supply chain certification of supplier is done via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org). Physical RSPO certificate for all diverted crops sent to Sedenak Mill, e.g. from Tereh, Pasir Panjang and Sindora were verified. Validity check was done prior to each FFB delivery. Certificate information verified; RSPO 613086 valid until 22/1/2020 (Tereh POM), RSPO 612392 valid until 22/1/2020 (Sindora POM) and RSPO 657192 valid until 8/3/2022 (Pasir Panjang POM)</p>	Yes
	<ul style="list-style-type: none"> The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements. 	<p>No traders and distributors for certified FFB purchased from own supply base and group estates. External suppliers FFB purchased were not certified.</p>	Yes
5.4.2	<p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	<p>Mechanism in place for handling nonconforming oil palm products and/or documents was describe in the procedure available. No non-conforming products recorded since last audit.</p>	Yes
5.5. Outsourcing activities			
5.5.1	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p>	<p>Outsource only involved transportation of CSPO only based on buyers' contractual requirements (delivered). CSPK sales contracts involved ex-mill.</p> <p>Sample transporter agreement sighted is Contract # MPSB/CPO 1/2016 (OLIMPIK); Variation Order: 01/2018 (Extension of contract period); Contractor: Pengangkutan Olimpik Sdn. Bhd.; Date: 25/2/2018; Scope: Transport of CPO from Mahamurni Plantations Sdn. Bhd. Group Mills to various refineries; Validity: 28/2/2018 – 29/2/2020.</p> <p>However, this outsourced activities is not applicable in the RSPO supply chain certificate scope.</p>	N/A

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;	Not applicable. No outsourcing activity.	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.	Not applicable. No outsourcing activity.	N/A
	c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.	Not applicable. No outsourcing activity.	N/A
	d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.	Not applicable. No outsourcing activity.	N/A
5.5.3	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	Not applicable. No outsourcing activity.	N/A
5.5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	Not applicable. No outsourcing activity.	N/A
5.6. Sales and goods out			

<p>5.6.1</p>	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number 	<p>Minimum information was ensured based on the following products sample agreements:</p> <p><u>Certified CPO</u></p> <p>Domestic Sale/Purchase Contract for Malaysian Crude Unbleached Palm Oil; Seller: Mahamurni Plantations Sdn. Bhd.; Buyer: Vance Bioenergy Sdn. Bhd.; Contract # CPOMB-M1901; Date: 11/2/2019; Commodity: CPO/RSPO MB; Quantity: 1,000.00 mt</p> <p>Sample dispatch:</p> <ul style="list-style-type: none"> - Dispatch (Weighbridge ticket) # C27590; Contract # CPO MB M 1905; DO # 1313; Net weight: 42.64 mt; Transport: NDB 247; Date: 7/8/2019 - Dispatch (Weighbridge ticket) # C27589; Contract # CPO MB M 1905; DO # 1312; Net weight: 40.60 mt; Transport: JNG 8698; Date: 7/8/2019 <p><u>Conventional CPO</u></p> <p>Domestic Sale/Purchase Contract for Malaysian Crude Unbleached Palm Oil; Seller: Mahamurni Plantations Sdn. Bhd.; Buyer: Mewaholeo Industries Sdn. Bhd.; Contract # MPO 19089; Date: 8/5/2019; Commodity: CPO In Bulk; Quantity: 1,000.00 mt</p> <p>Sample dispatch:</p> <ul style="list-style-type: none"> - Dispatch (Weighbridge ticket) # C27583; Contract # MPO 19051; DO # 1306; Net weight: 41.94 mt; Transport: JKF 6937; Date: 6/8/2019 	<p>Yes</p>
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		<ul style="list-style-type: none"> - Dispatch (Weighbridge ticket) # C27572; Contract # MPO 19034; DO # 1294; Net weight: 43.62 mt; Transport: MBS 8698; Date: 5/8/2019 <p><u>Certified PK</u></p> <p>Domestic Sale/Purchase Contract for Malaysian Palm Kernels; Seller: Mahamurni Plantations Sdn. Bhd.; Buyer: PGEO Oil Mill Sdn. Bhd.; Contract # MPOK 1902MB; Date: 2/4/2019; Commodity: PK In Bulk/RSPO MB; Quantity: 500.00 mt</p> <p>Sample dispatch:</p> <ul style="list-style-type: none"> - Dispatch (Weighbridge ticket) # K07740; Contract # MPOK 1902 MB; CO # 42293; Net weight: 39.43 mt; Transport: JME 3222; Date: 29/4/2019 - Dispatch (Weighbridge ticket) # K07738; Contract # MPOK 1902 MB; CO # 42284; Net weight: 39.34 mt; Transport: JHH 2621; Date: 26/4/2019 <p><u>Conventional PK</u></p> <p>Domestic Sale/Purchase Contract for Malaysian Palm Kernels; Seller: Mahamurni Plantations Sdn. Bhd.; Buyer: Premium Vegetable Oils Sdn. Bhd.; Contract # MPK 19059; Date: 8/8/2019; Commodity: PK In Bulk; Quantity: 300.00 mt</p> <p>Sample dispatch:</p> <ul style="list-style-type: none"> - Dispatch (Weighbridge ticket) # K07743; Contract # MPK 19002; CO # 037821; Net weight: 39.33 mt; Transport: JQQ 9636; Date: 30/4/2019 <p>Dispatch (Weighbridge ticket) # K07742; Contract # MPK 19010; CO # 42323; Net weight: 38.81 mt; Transport: JME 3222; Date: 30/4/2019</p>	
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	<ul style="list-style-type: none"> Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). 	Information is complete and available in various documents such as sales contract, mill weighbridge ticket, delivery note, transporter collection order.	Yes
	<ul style="list-style-type: none"> For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance. 	Detail of transaction can be found in table attached in the report.	Yes
5.7. Registration of transactions			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> are mills, traders, crushers and refineries and; take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. 	<p>MKD shall make announcement via PalmTrace immediate after CSPO delivery and invoices have been issued. However, the announcement will also subject to requirement by the buyer.</p> <p>Sighted the announcement in PalmTrace was made at least once a month for both CSPO and CSPK.</p>	Yes
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> 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. 	<p>Based on the announcement summary, all the registrations were found to be in order. Total registered transaction (extracted from Palm Trace) summarized as per below: CPO: 3,639.22 mt PK: 813.60 mt</p> <p>Detailed transaction can be found in table attached in the report.</p>	Yes
	<ul style="list-style-type: none"> Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace 	Not applicable. Products are not sold beyond refinery.	N/A

	document with a unique traceability number. Tracing can be done in a consolidated way at least annually.		
	<ul style="list-style-type: none"> Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. 	Based on the quarterly mass balance accounting sheet, the removal of volumes was done correctly when the products were sold as conventional.	Yes
	<ul style="list-style-type: none"> Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 	Based on the announcement summary, all the confirmations were found to be in order.	Yes
5.8. Training			
5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.	The mill established Annual Training Program 2019; Doc. # SDPOM/SOP/7.8-F6; Issue # 3; Rev. 0; Date: 1/2/2018 which include RSPO Supply Chain training.	Yes
5.8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.	<p>Relevant personnel to supply chain implementation as defined by the CU are the personnel that involve in supply chain implementation such as Assistant Managers, QA, clerk, lab supervisor & assistant, weighbridge operators.</p> <p>Latest training was conducted on 18/9/2019 at Kulim HQ in Ulu Tiram Estate. Training attended by personnel from Sustainability & Quality Department, all complexes RC Execs, all complexes mill staff involved in SCCS, engineering department and marketing department. Training was delivered by OSH-ISIS.</p>	Yes
5.9. Record Keeping			
5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date and accessible.	Yes

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5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	As spelt out in the procedure, Control of Quality Records, SDPOM/SOP/7.6 issue: 3 dated 1/2/18 records are to be maintained minimum of three years.	Yes
5.9.3	The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	Not applicable. The product of the facility is containing 100% palm oil. Forecast volume as specified in table attached in the report.	N/A
5.10. Conversion factors			
5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivaties. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.	Conversion factor of CPO and PK production is depending on the actual OER and KER.	Yes
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Yes
5.11. Claims			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims. Refer to RSPO trademark and license registered under Kulim (M) Berhad (parent company: Johor Corporation) 1-0080-09-100-00 for supply chain model (IP and MB) valid until 22/1/2020.	Yes
General corporate communications			

4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No off-product claim made by Sedenak POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc).	Yes
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.	Not applicable as no off-product claim made by Sedenak POM as to date.	Yes
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not applicable as no off-product claim made by Sedenak POM as to date.	Yes
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Not applicable as no off-product claim made by Sedenak POM as to date.	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 evidence of RSPO corporate logo used by Sedenak POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc).	Yes
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Yes

5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that i.e product/commodity with SCC model (CSPK MASS BALANCE) and RSPO certificate number; RSPO 537873 as per despatch samples above. This also applies to CPO.	Yes
5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <ul style="list-style-type: none"> a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2. 	Sedenak POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not applicable
5.4	A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification. 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.	Sedenak POM is producing crude palm product and does not involved in any labelling of end product and the presence of certified palm oil contained within a product. This requirement is for the next supply chain actor and not applicable for POM.	Not applicable
Business to consumer communication			

6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	No business to consumer communication on product specific claim made by Sedenak POM and only producing crude and unfinished product. This is not applicable for POM.	Not applicable
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	No business to consumer communication on product specific claim made by Sedenak POM and only producing crude and unfinished product. This is not applicable for POM.	Not applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	No business to consumer communication on product specific claim made by Sedenak POM and only producing crude and unfinished product. This is not applicable for POM.	Not applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	No business to consumer communication on product specific claim made by Sedenak POM and only producing crude and unfinished product. This is not applicable for POM.	Not applicable
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	No business to consumer communication on product specific claim made by Sedenak POM and only producing crude and unfinished product. This is not applicable for POM.	Not applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	No business to consumer communication on product specific claim made by Sedenak POM and only producing crude and unfinished product. This is not applicable for POM.	Not applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	No business to consumer communication on product specific claim made by Sedenak POM and only producing crude and unfinished product. This is not applicable for POM.	Not applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be 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	No business to consumer communication on product specific claim made by Sedenak POM and only producing crude and unfinished product. This is not applicable for POM.	Not applicable

	<p>of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p>		
<p>MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES</p>			
<p>Auditor Hint: This specific rules shall be audited concurrently with the relevant Module A and Module B (including Module F & G) under the Supply Chain Modular Requirements</p>			
<p>Certified oil palm content (IP)</p>			
	<p>For IP, 95% or above of the oil palm content must be RSPO IP-certified.</p>	<p>Sedenak POM is using MB SC Model.</p>	<p>Not applicable</p>
	<p>For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.</p>	<p>Sedenak POM is using MB SC Model.</p>	<p>Not applicable</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p>	<p>Sedenak POM is using MB SC Model.</p>	<p>Not applicable</p>
<p>Labelling and trademark (IP)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways: a. RSPO trademark which includes the tag 'CERTIFIED' or</p>	<p>Sedenak POM is using MB SC Model.</p>	<p>Yes</p>

	<p>b. RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</p>		
Messaging (IP)			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	<p>Sedenak POM is using MB SC Model.</p>	<p>Not applicable</p>
MODULE B – MASS BALANCE SPECIFIC RULES			
Auditor Hint:			
<p>This specific rules shall be audited concurrently with the relevant Module C (including Module F & G) under the Supply Chain Modular Requirements</p>			
Minimum Mass Balance content (MB)			

	95% or above of the oil palm content must be RSPO MB-certified.	Sedenak POM is producing crude palm products i.e. CPO and PK which were 100% RSPO MB-certified. No consumer produced by the mill.	Not applicable
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	Sedenak POM is producing crude palm products i.e. CPO and PK which were 100% RSPO MB-certified. No consumer produced by the mill.	Not applicable
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 	Sedenak POM is producing crude palm products i.e. CPO and PK which were 100% RSPO MB-certified. No consumer produced by the mill. Hence, product labelling and trademark are not applicable.	Not applicable
Messaging (MB)			

	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. • In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed. 	<p>Sedenak POM is producing crude palm products i.e. CPO and PK which were 100% RSPO MB-certified. No consumer produced by the mill. Hence, product labelling and trademark are not applicable.</p>	<p>Not applicable</p>
	<p>Messaging NOT ALLOWED in storytelling in product-related communications: Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</p>	<p>Sedenak POM is producing crude palm products i.e. CPO and PK which were 100% RSPO MB-certified. No consumer produced by the mill. Hence, product labelling and trademark are not applicable.</p>	<p>Not applicable</p>
MODULE C – PARTIAL PRODUCT CLAIMS			
	<p>To increase awareness among consumers of the availability of sustainable oil palm products and to help accelerate the uptake, it is permissible to make a claim on product when the percentage of the oil palm content is less than 95% certified, but only when the following conditions have been met:</p> <ul style="list-style-type: none"> • The member making the claim is the end product manufacturer, is an RSPO member and is certified against the RSPO SCCS or is an RSPO retailer member authorized to use the trademark by the RSPO. • At least 50% of the oil palm content has been supplied through an RSPO certified supply chain as IP, SG or MB. • The remainder of the oil palm content that is not RSPO-certified is covered by the purchase of RSPO Credits to an equivalent volume. 	<p>Sedenak POM is producing crude palm products i.e. CPO and PK which were 100% RSPO MB-certified. No consumer produced by the mill. Hence, product labelling and trademark are not applicable.</p>	<p>Not applicable</p>

	<ul style="list-style-type: none"> The product-specific claim is limited to only the following phrase: 'This product contributes to the production of certified sustainable palm oil'. The use of the RSPO label with this claim is mandatory and must include the tag '50% MIXED'. No other percentage is allowable within this claim. 		
MODULE D – COMBINED SUPPLY CHAIN MODELS SPECIFIC RULES			
	<p>Where a mixture of inputs supplied through different RSPO supply chain models are present in a product, the following applies:</p> <p>75% IP + 20% SG => 95% SG claim is made 65% SG + 30% MB => 95% MB claim is made 55% MB + 40% B&C => 95% partial product claim can be made 45% SG + 55% B&C < 50% B&C claim can be made</p>	Sedenak POM is producing crude palm products i.e. CPO and PK which were 100% RSPO MB-certified. No consumer produced by the mill. Hence, product labelling and trademark are not applicable.	Not applicable
	<p>Where one supply chain model accounts for 95% of the oil palm content, the claim for this specific model may be made:</p> <p>95% IP + 5% MB => 95% IP IP claim can be made 95% SG + 5% MB => 95% SG SG claim can be made 95% MB + 5% C => 95% MB MB claim can be made</p>	Sedenak POM is producing crude palm products i.e. CPO and PK which were 100% RSPO MB-certified. No consumer produced by the mill. Hence, product labelling and trademark are not applicable.	Not applicable
5.12. Complaints			
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	Complaint is handled based on Management Process Procedure, Managing Customer Feedback, SDPOM/SOP/9.4, issue # 3 dated 1/2/2018.	Yes
5.13. Management Review			
5.13.1	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.	Management review was last conducted on 26/9/2019. The meeting was chaired by Senor Mill Manager and attended by mill management team. Frequency of meeting is on annual basis where previous meeting was conducted on 28/9/2018.	Yes

5.13.2	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	<p>Based on the minutes of meeting (Meeting 01/2019), the following agendas were adequately recorded:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Analysis of data, FFB Quality, Production Performance, External provider’s performance, product conformity • Changes that could affect the management system. • Recommendations for improvement (human resource, equipment and workplace planning) 	Yes
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"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	<p>Discussion about the improvement of the effectiveness of the management system and its processes, and any resource needs were found to be included in the meeting minute.</p>	Yes

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

E.1 Definition									
	Requirement	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)						
E.1.1	Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	Sedenak Palm Oil Mill receives and process certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During this recertification assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and sales volume of RSPO certified palm products through RSPO IT System.	Yes						
E.2 Explanation									
E.2.1	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill was recorded in this public summary report together with actual production volume.	Yes						
E.2.2	The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).	<p>The mill met all registration and reporting requirements in RSPO IT Platform as following:</p> <table border="1"> <tr> <td>Member Name</td> <td>Kulim (Malaysia) Berhad – Sedenak Palm Oil Mill</td> </tr> <tr> <td>Member ID</td> <td>RSPO_PO1000000019</td> </tr> <tr> <td>RSPO Membership Number</td> <td>1-0080-09-000-00</td> </tr> </table>	Member Name	Kulim (Malaysia) Berhad – Sedenak Palm Oil Mill	Member ID	RSPO_PO1000000019	RSPO Membership Number	1-0080-09-000-00	Yes
Member Name	Kulim (Malaysia) Berhad – Sedenak Palm Oil Mill								
Member ID	RSPO_PO1000000019								
RSPO Membership Number	1-0080-09-000-00								

E.3 Documented procedures			
E.3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following: a. Complete and up to date procedures covering the implementation of all the elements in these requirements;	The written procedure available is Sustainable Management System; Traceability; Doc. # SQD/SMS/1.2; Issue # 1; Date: 28/2/2019. On the marketing side, Procedure title: RSPO Supply Chain; Procedure # MKD/001; Date: 9/10/2018 is referred to.	Yes
	b. The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.	The person having overall responsibility for and authority over the implementation is Head of each operating unit for RSPO, MSPO and ISCC Certification Program, as per appointment letter SQD/ADMIN/017/19; Dated 22/9/2019. For Sedenak Mill, the Senior Mill Manager is Haji Kamaroulzaman Thith.	Yes
E.3.2	The site shall have documented procedures for receiving and processing certifies an non-certified FFBs.	Sedenak Palm Oil Mill has documented procedures for the incoming FFB, processing and outgoing palm products (CPO and PK). System available to make marking/ID on the receiving documents to differentiate the certified and non-certified FFB received	Yes
E.4 Purchasing and goods in			
E.4.1	The site shall verify and document the volumes of certified and non-certified FFBs received.	Implementation was based on System; Traceability; Doc. # SQD/SMS/1.2; Issue # 1; Date: 28/2/2019.	Yes
E.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	No overproduction issue. Based on the records of Todate FFB Received dated 28/9/2019 for FFB received from own certified, group certified and non-certified source sighted available. Other than own supplying estates (Sedenak, Ulu Tiram, Basir Ismail & Kuala Kabong), external suppliers including the sample sighted as following: - Kebun Sedenak	Yes

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		<ul style="list-style-type: none"> - Peladang Kulai - Guan Leng - Ree Fong <p>October 2018 – August 2019: Total FFB received: 379,767.51 mt Certified FFB: 135,992.80 mt Uncertified FFB: 243,774.71 mt Total FFB processed: 379,767.51 mt Total CPO produced: 79,355.83 mt Total PK produced: 20,867.96 mt Total CPO despatched: 59,870.98 mt Total PK despatched: 1,055.72 mt</p>	
E.5 Record keeping			
E.5.1	a. The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis by RSPO.	<p>Records of FFB receipts available for both certified and non-certified source as per following:</p> <p>Sample internal certified FFB received:</p> <ul style="list-style-type: none"> - Supplier: Basir Ismail Estate; W/bridge ticket # 382250; Date: 27/9/2019; DO # 087794; Nett weight: 41,920kg; Vehicle # JMU 8236 - Supplier: Kuala Kabong Estate; W/bridge ticket # 382273; Date: 27/9/2019; DO # 029102; Nett weight: 36,650kg; Vehicle # WFP 4832 <p>Sample group certified FFB received:</p> <ul style="list-style-type: none"> - Supplier: Sungai Papan Estate; W/bridge ticket # R372293; Date: 7/3/2019; DO # 237959; Nett weight: 37,390kg; Vehicle # WFW 4693 	Yes

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		<ul style="list-style-type: none"> - Supplier: Sindora Estate; W/bridge ticket # R372243; Date: 7/3/2019; DO # 237492; Nett weight: 37,550kg; Vehicle # JQC 7101 <p>Sample external uncertified FFB received:</p> <ul style="list-style-type: none"> - Supplier: Ree Fong Agriculture Sdn. Bhd.; W/bridge ticket # 382260; Date: 27/9/2019; DO # 217919; Nett weight: 6,860kg; Vehicle # JBS 2657 - Supplier: Guan Leng Trading Sdn. Bhd.; W/bridge ticket # 382252; Date: 27/9/2019; DO # 145389; Nett weight: 44,490kg; Vehicle # JTP 4311 <p>For products deliveries, following were sampled:</p> <p>Certified CPO Sample dispatch:</p> <ul style="list-style-type: none"> - Dispatch (Weighbridge ticket) # C27590; Contract # CPO MB M 1905; DO # 1313; Net weight: 42.64 mt; Transport: NDB 247; Date: 7/8/2019 - Dispatch (Weighbridge ticket) # C27589; Contract # CPO MB M 1905; DO # 1312; Net weight: 40.60 mt; Transport: JNG 8698; Date: 7/8/2019 <p>Certified PK Sample dispatch:</p> <ul style="list-style-type: none"> - Dispatch (Weighbridge ticket) # K07740; Contract # MPOK 1902 MB; CO # 42293; Net weight: 39.43 mt; Transport: JME 3222; Date: 29/4/2019 - Dispatch (Weighbridge ticket) # K07738; Contract # MPOK 1902 MB; CO # 42284; Net weight: 39.34 mt; Transport: JHH 2621; Date: 26/4/2019 	
	<p>b. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated</p>	<p>Computerized system in place with the delivery deducted accordingly.</p>	<p>Yes</p>

	<p>c. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.) For further details refer to Module C.</p>	<p>Site only delivers mass balance sales from positive stock. No short sell recorded as to date based on mass balance sheet.</p>	<p>Yes</p>
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Supply Chain Declaration *(Applicable For Appendix E)*

A. Monthly Records of Certified and Uncertified FFB Received since the last audit (Oct 2018-Aug 2019)				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	October 2018	19,651.60	27,458.54	47,110.14
2	November 2018	19,021.24	26,564.89	45,586.13
3	December 2018	16,410.77	25,789.01	42,199.78
4	January 2019	13,845.97	25,055.10	38,901.07
5	February 2019	11,250.98	19,560.81	30,811.79
6	March 2019	11,203.80	23,897.26	35,101.06
7	April 2019	4,237.48	9,885.74	14,123.22
8	May 2019	7,636.89	14,086.50	21,723.39
9	June 2019	8,142.79	19,857.01	27,999.80
10	July 2019	12,004.22	26,905.41	38,909.63
11	August 2019	12,632.70	24,946.28	37,578.98
Total		136,038.44	244,006.55	380,044.99

B. Monthly Records of Certified CPO & PK since the last audit (Oct 2018-Aug 2019)			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	October 2018	4,038.32	1,099.86
2	November 2018	3,936.93	1,047.33
3	December 2018	3,377.14	892.00
4	January 2019	2,909.36	740.72
5	February 2019	2,409.57	630.32
6	March 2019	2,422.43	630.81
7	April 2019	894.86	238.69
8	May 2019	1,584.89	412.55
9	June 2019	1,686.15	401.53
10	July 2019	2,461.12	664.16
11	August 2019	2,664.84	719.87
Total		28,385.61	7,477.84

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B. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any)						
No.	Month- Year (Oct 18-Aug 19)	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Palmtrace Trading License Number	Certified PK Sold (mt)
1	October 2018	xx	-	-	TR-2d43d2e6-d6fb TR-a8997087-ec28	246.47
2	November 2018	xx	-	-	TR-63f0c54f-0d3c	222.28
3	December 2018	xx	TR-d1ce902c-bd30 TR-af4d3473-ee84	1,151.25	TR-09c9cd53-675b	104.28
4	January 2019	xx	TR-117b55f4-0990	42.11	-	-
5	February 2019	xx	TR-b3099b07-9f17	864.94	-	-
6	March 2019	xx	TR-cdc94aaf-0935	451.54	-	-
7	April 2019	xx	TR-3db01a75-4c36	387.64	TR-8270edb7-b0e2	240.57
8	May 2019	xx	-	-	-	-
9	June 2019	xx	TR-244f61f2-fb3d	448.91	-	-
10	July 2019	xx	-	-	-	-
11	August 2019	xx	TR-6ca68c03-ece1	292.83	-	-
Total		xx		3639.22		813.6

Note:

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

Example:

Certification date is 01/01/2017.

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

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

Please add rows if necessary

C. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any)					
No.	Month- Year (Oct 18-Aug 19)	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	October 2018	xx	ISCC	886.64	-
2	November 2018	xx		1,092.19	-
3	December 2018	xx		757.47	-
4	January 2019	xx		2,564.82	-
5	February 2019	xx		1,757.19	-
6	March 2019	xx		1,013.34	-
7	April 2019	xx		1,103.77	-

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8	May 2019	xx		1,486.94	-
9	June 2019	xx		458.61	-
10	July 2019	xx		930.15	-
11	August 2019	xx		1,162.27	-
	Total	-		13,213.39	-

Note:

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

Example:

Certification date is 01/01/2017.

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

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

Please add rows if necessary

E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any)

No.	Month- Year (Oct 18-Aug 19)	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	October 2018	xx	813.48	492.34
2	November 2018	xx	558.84	601.80
3	December 2018	xx	817.91	633.34
4	January 2019	xx	1,920	718.50
5	February 2019	xx	784.31	644.75
6	March 2019	xx	1,019.3	465.62
7	April 2019	xx	233.93	588.15
8	May 2019	xx	833.34	557.66
9	June 2019	xx	801.69	441.02
10	July 2019	xx	722.15	381.11
11	August 2019	xx	168.25	473.21
	Total	-	8,673.20	5997.50

Note:

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

Example:

Certification date is 01/01/2017.

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

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

Please add rows if necessary.

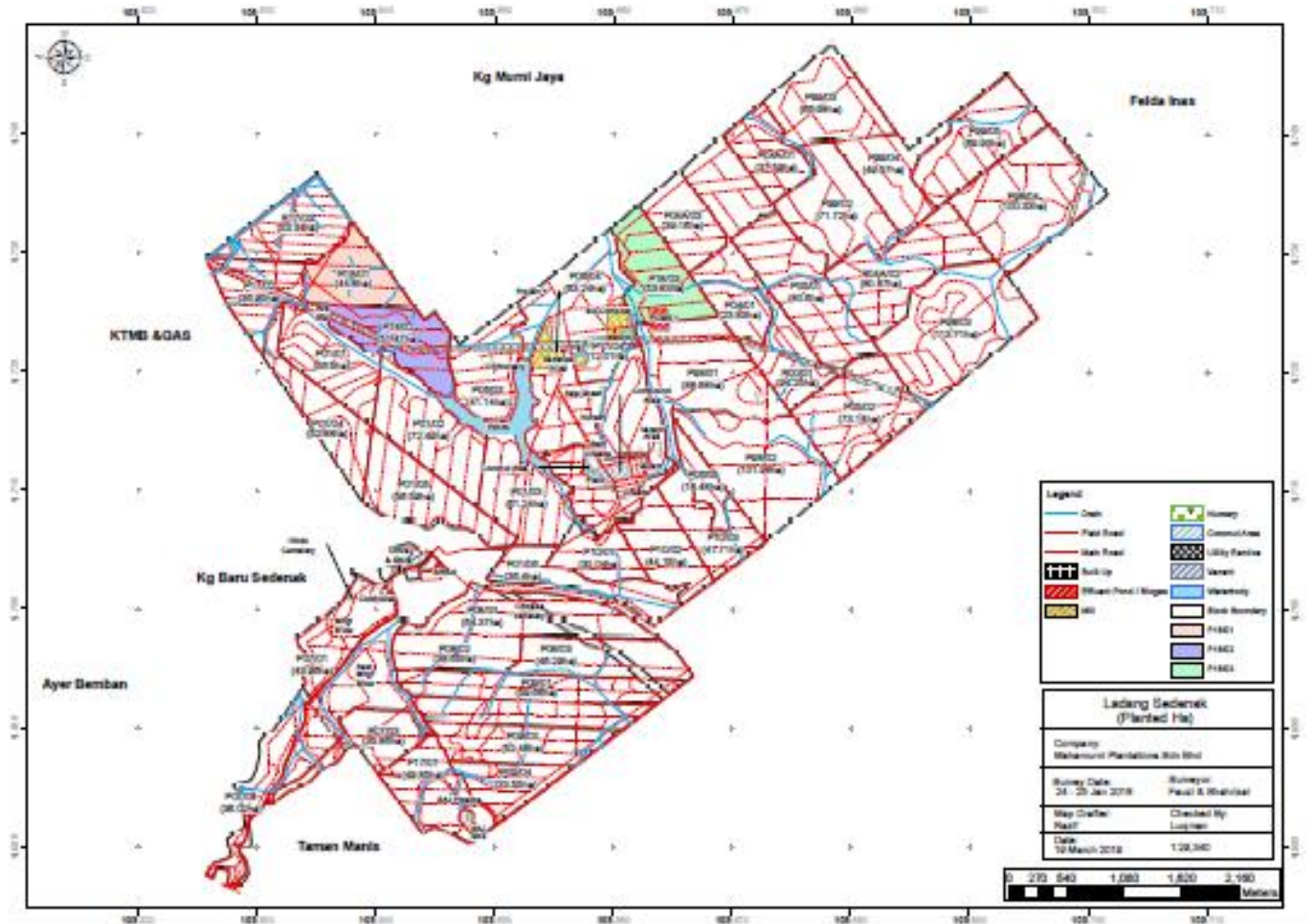
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D. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any) (Oct 2018-Sept 2019)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
-	-	-	-

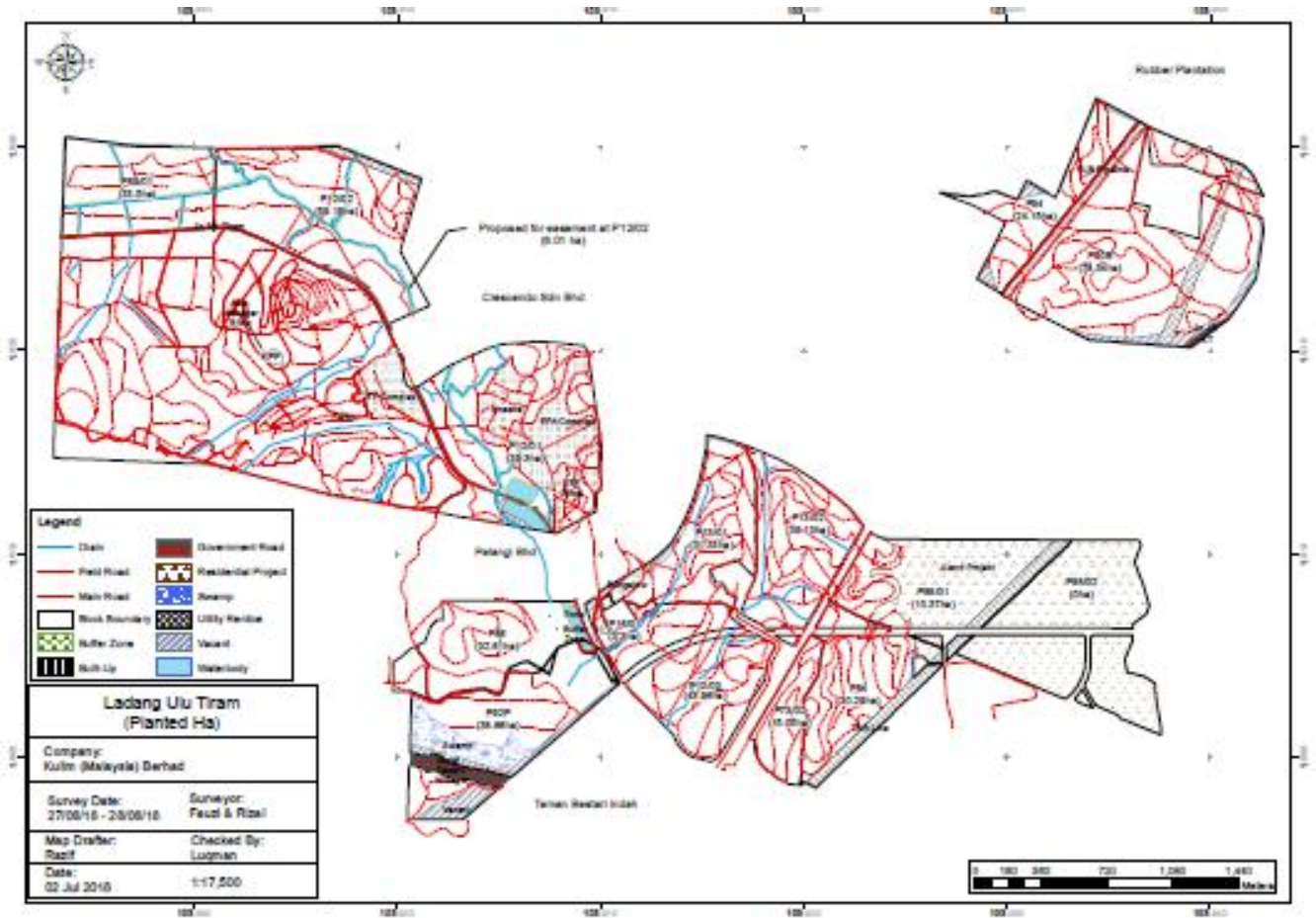
Appendix F: Location Map of Sedenak Palm Oil Mill and Supply bases



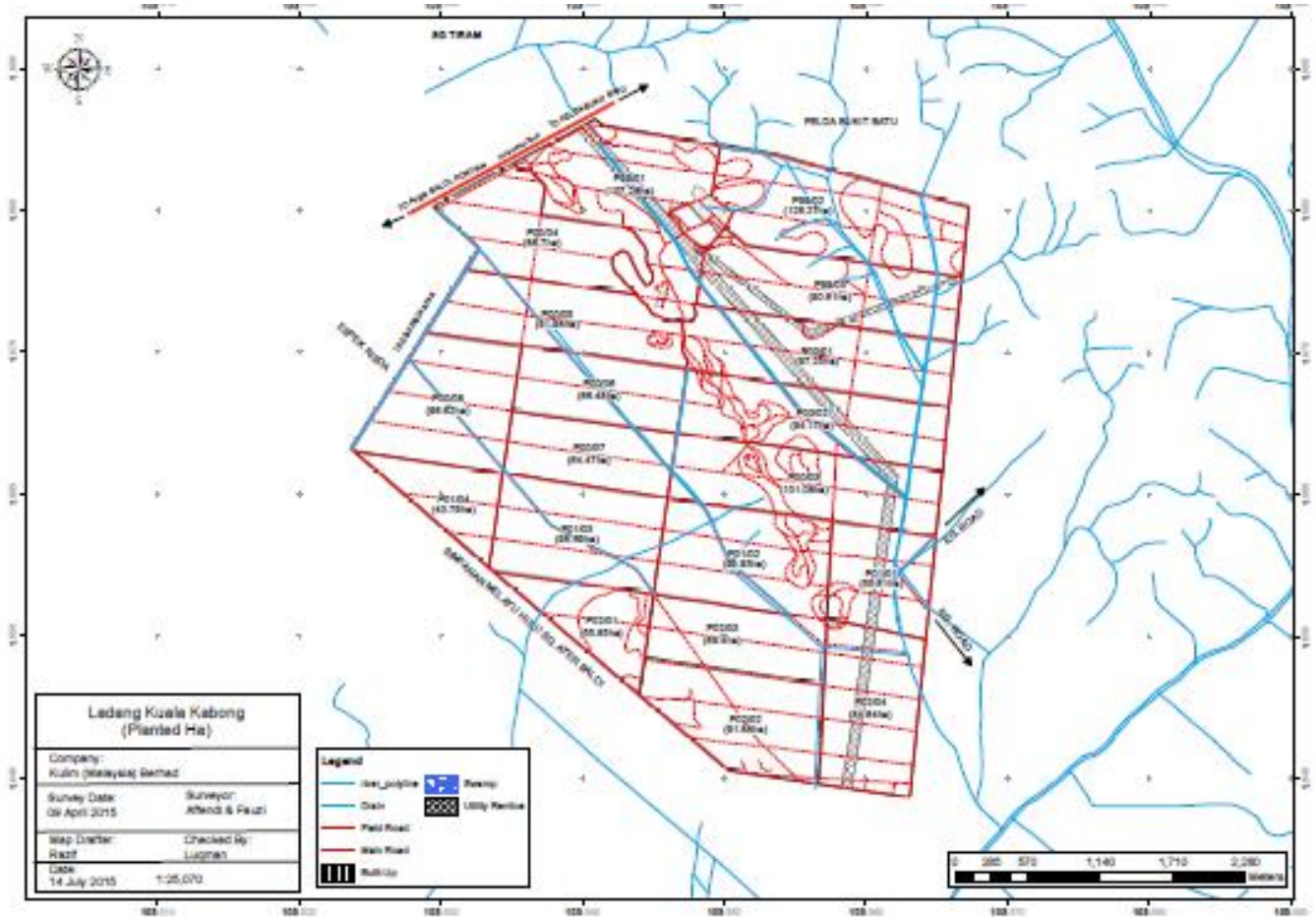
Appendix G: Sedenak Estate Field Map



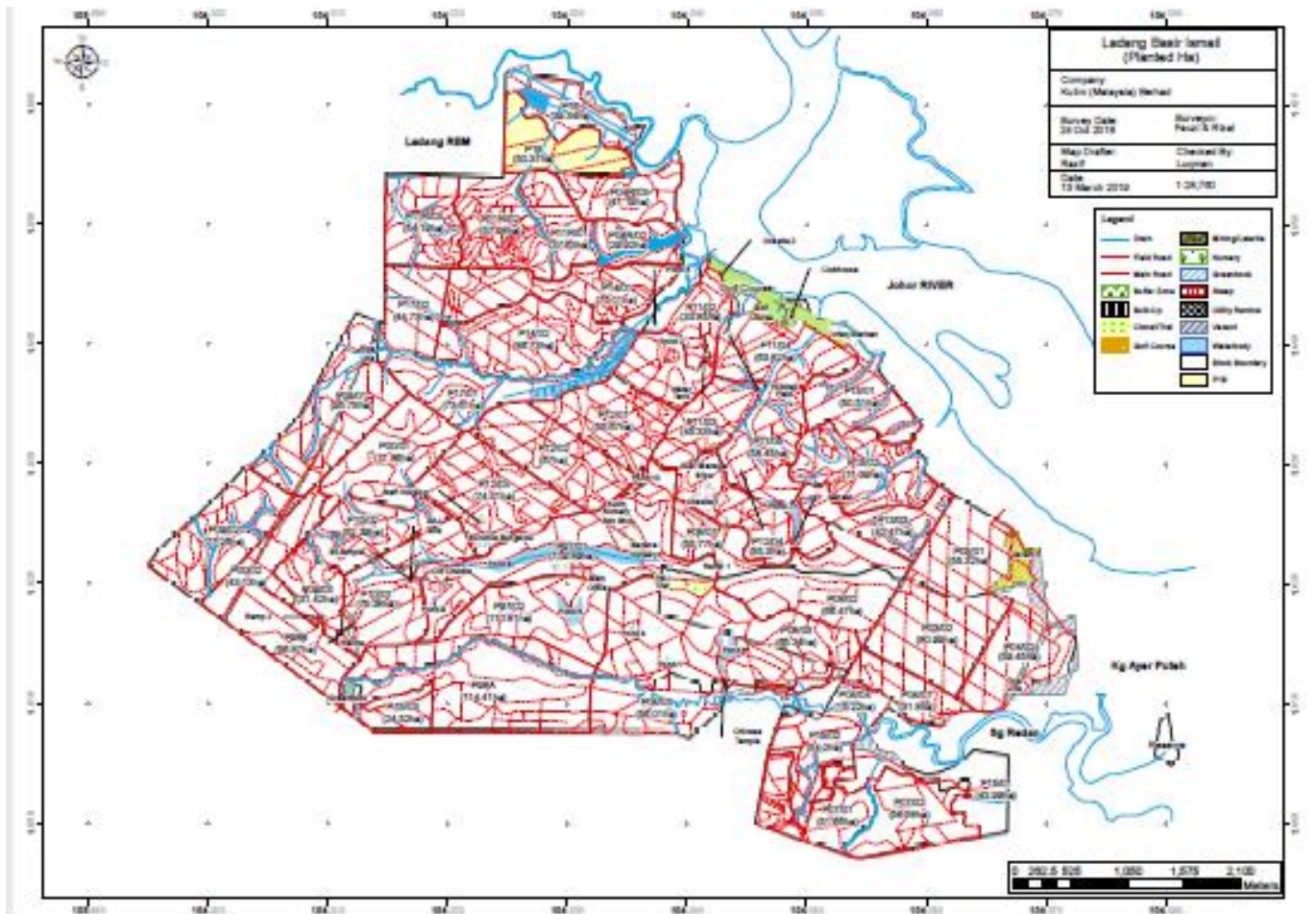
Appendix H: Ulu Tiram Estate Field Map



Appendix I: Kuala Kabong Estate Field Map



Appendix J: Basir Ismail Estate Field Map



Appendix K: List of Smallholder Sampled

–Not applicable

Appendix L: List of Abbreviations

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